

# **The Fire Officers' Association**

## **Comment on Guidance Notes on Fire Authority Risk Management Planning May 2003**

### **Introduction**

The Fire Officers' Association firmly supports the principle that the existing standards of fire cover are outdated. We also support the concept that evidence-based risk assessment is necessary to allow the service to demonstrate that resources are allocated according to need and to introduce a more effective means by which to act on the principle that 'prevention is better than cure'.

The introduction of IRMP through natural evolution of the service would have been preferable to its advent as a by-product of a long-running and bitter dispute. Whilst we believe that there is a need for IRMP and that it has to be implemented, there are many who do not. Developing IRMP in an atmosphere of distrust and suspicion will be very difficult task for all concerned.

Whilst we fully support the need for change, we have some reservations about the manner in which it will be achieved. Change has to be managed and the first step to successful implementation should be engaging support from those who will be most affected. This depends on effective 'marketing' of the benefits that will be delivered. In these terms, IRMP starts out with a huge handicap. Overcoming this will require very careful management and great endeavour to ensure its credibility at every step. Even then, it will take time to build trust between the workforce and management and the process would be greatly assisted by openly demonstrating that the legitimate concerns of stakeholders have been taken account of.

This Association finds it necessary to express a degree of scepticism over the linkage of pay to modernisation of the fire service. Specifying that Integrated Risk Management, primarily, should deliver some 5% savings on the pay bill in 12 months is certainly not the best way to engender ownership of the principle that risk assessment should dictate how services are provided. Indeed the pay offer fails to recognise that meeting targets for change will be dependent upon the ability and willingness of service managers to deliver against a likely background of non-co-operation.

Commencing IRMP work with a savings target will dictate the extent of innovation and change within brigades. We fear it will encourage the adoption of a 'tick in the box' mentality where the rigour of challenge to existing service delivery reduces significantly once the number of 'ticks' are sufficient to meet the target. The pre-determination of outcomes will not promote a 'continuous improvement' culture in which all avenues for improvement are considered. This, we feel, is illustrated by brigades' failure to undertake the fundamental Best Value Service Review of operational fire cover which might have been a high priority because of its potential to realise cost and / or efficiency savings for re-direction into other areas. Instead, in many cases Best Value has been limited to doing only what is necessary to satisfy auditors.

If approached as set out in the guidance, IRMP will be an objective assessment of risk to communities and will dictate the required balance between reactive and preventative measures. A purely objective assessment might, therefore, determine that additional resources are necessary to control identified risks. Whilst we consider this event unlikely, the assumption that savings will be made rules out any possibility of increased provision and this is not likely to inspire the confidence of the workforce or communities, especially when there are elements actively expressing the view that modernisation will cost lives and jobs.

## **Timescale**

We have serious doubts over achievability of the timescale outlined in the guidance.

The resource implications of IRMP will interfere with existing plans and priorities since IRMP requirements override fire authorities' current development plans. Stress levels amongst senior managers are already increasing and fire authorities (and their Brigades) should be pressed to re-prioritise activities to allow the workloads to be prioritised and matched to available resources rather than just add the additional work of IRMP.

We have concerns over the funding allocation system which could penalise authorities that are able to realise savings. A fair method is needed to ensure that allocated funds take account of potential for savings since some areas might have limited scope to save and will perhaps require relatively high funding levels to maintain the current service levels.

IRMP, if informed by objective risk assessment, should dictate the level of service and the resource requirements. It should, therefore, be impossible to predict savings potential. Although there is an expectation that savings will be realised, this cannot be guaranteed and caution is urged during the initial planning stage to avoid over ambitious and unachievable targets.

For a project intended to ensure the safety of the nation, the time frame seems to be driven more by spreadsheet economics than allowing sufficient time for thorough objective appraisal of service delivery options.

## **Local versus National Risk**

Whilst a key element of IRM should be the identification and control of local risks, sight should not be lost of the wider associated Chemical, Biological, Radiological and Nuclear (CBRN) risks. There is a need to ensure that adequate provision is made on a local, regional and national basis and consultation with regional and national stakeholders must form part of the IRM process.

Guidance should clearly indicate that the value for money aspect should not override the need to provide a service able to cater for unforeseen major events rather than simply setting the value for money parameters around day-to-day occurrences.

If one were to undertake global horizon scanning, a focus on local IRMPs might give rise to some concern. Cognisance needs to be taken of large-scale risks with potential to extend beyond a single fire authority area. A national IRM Plan would inspire greater confidence with the nation's population as well as present opportunities to centrally support and develop common elements of IRMP.

Moving towards the replacement of national fire-cover standards with local ones over the short timescale allowed for the preparation and implementation of IRMPs could be inherently flawed for the following reasons:

- Local fire related expertise in formulating risk management plans is untested and there is little time available to train staff.
- Financial and political factors could have a major influence on the type and style of response levels and resources available to cope with incidents
- Incidents requiring a regional or national response might not be adequately catered for by local risk management plans.
- There is a risk that the national interest would be compromised by the emphasis on inward looking risk management planning.

To overcome these hurdles minimum response levels should be prescribed which are local risk and national risk related, based on a national generic standard.

It is debatable whether each authority should have its own aims and objectives with regard to community safety and fire response. Since the core objectives of each brigade are likely to be similar, if not identical, we feel it might be more appropriate to set aims and objectives nationally.

### **Governance and accountability**

Central government needs to do more to educate local elected members in their responsibilities to communities and the principles of accountability. There is little evidence that previous decisions of fire authorities are transparent and based on the assessment of evidenced business cases.

Reliance upon fire authorities for the delivery of IRMP may carry some risk of failing to produce timely and fit for purpose fire response IRMPs. Some fire authorities have involved politically subscribed trade unions at their very heart, thereby allowing some management research and initiatives to be overturned without open debate. Continuation of this practice might stall, and possibly stop, the introduction of comprehensive and concise IRMPs through internal political argument.

This Association agrees that non-prescription is desirable since we have for some time been highlighting the conflict between addressing local needs and meeting centrally imposed targets. However, some authorities might have difficulty applying a non-prescriptive approach, as they will be open to political intervention at group level by trade union activists who may be opposed to the development of integrated risk management planning. Situations such as this might be avoided by external scrutiny of IRMPs and process auditing.

Rigorous scrutiny arrangements will be required to ensure that IRMPs are reviewed and revised on a regular basis and that such review is carried out correctly and professionally. Scrutiny of decisions made as a result of IRMP will be a specialised area and a high level of expertise in assessing supporting evidence to confirm that reasonable decisions are made will be required. This element of external audit might ordinarily fall to the Fire Service Inspectorate. However, the Inspectorate seems likely to have a pivotal role in guiding fire authorities on the conduct of Integrated Risk Management Planning and to retain audit responsibility would cause a conflict of interest. We, therefore, recommend that the Audit and Accounts Commissions be empowered to audit the management and IRMP processes employed within fire authorities.

Additional resources and possibly a complete restructure of the Fire Service Inspectorate may be required if it is to effectively disseminate and deliver information to fire authorities.

Resources will also need to be identified in order to establish the internal monitoring and review arrangements referred to in the guidance. Presumably, such arrangements will be over and above any external audit and review. Whilst scrutiny of the IRMP is essential, there is a risk that the cost of providing two levels of oversight will erode any savings made in service areas. Care must be taken to ensure that the costs of scrutiny do not outweigh the benefits.

## **Evidence**

Much of the service's 'Pathfinder' work now seems to be somewhat discredited largely because it:

- failed to take account of all factors affecting operational response
- set 'tolerable risk' at a relatively high level, and
- determined that very little change could occur until risk reduction had been sustained for a considerable period of time.

However, many of the 'Pathfinder' tools and processes remain valid and their methodology can and should be applied to IRMP for the provision of supporting evidence. We believe that a toolkit is being developed from the 'Pathfinder' project and recommend that it become embedded in the IRMP process.

It is becoming apparent that some Chief Officers have already made the decision that city and town centre fire cover can be reduced at night once the population has migrated to suburbs at the end of the working day. However, many city/town centres become entertainment centres, and it should be borne in mind that even though calculations based on empirical evidence would not prescribe that the day and night appliance deployment should be the same, the potential for a single event mass loss of life might be greatly increased during the evening and early part of the night. It is our recommendation that the above factor be incorporated in to any calculation of inner city resource requirements.

## **Integration with local authorities**

We believe that the fire service should extend its role in the community to reduce risks in areas other than fire. However, local authorities need to be aware that the service should be more involved in the community planning process to identify opportunities for fire service resources to be used in other areas of benefit and where local authority services can assist the service promote its objectives, and vice-versa. Similar considerations apply in relation to other public service and organisations having an interest in the community planning process. This is key to successful public sector partnerships and the delivery of joined-up services.

IRM should not, and cannot be an overnight change. We believe that changes should not be based on subjective opinion but on firm evidence. Using performance information to determine service planning still requires a change in fire service culture. Informed planning and option appraisal based on properly constructed business cases is an area that still needs to be developed. Fire Authorities should expect Brigades to make proposals on this basis, to scrutinise service plans and to shoulder the burden of accountability.

## **Assessment of current and past performance**

It will be difficult, if not impossible, to measure cost effectiveness, as the service has no means of comparing fire loss prevented against cost of service provision. How should effectiveness be measured and against what should it be compared? We consider this to be an area that will need central guidance supported by meaningful outcome-based performance indicators.

Similarly, there will be great difficulty assessing the effectiveness of Community Fire Safety (CFS) since measurement of benefit and effectiveness is poorly developed at best. Targeted measurement of specific initiatives and activities will be required to provide the evidence needed to support IRMPs .

The National Community Fire Safety Centre, in discussion with Fire Investigation Research and Evaluation Services (FIRES) steering group, acknowledges that its research is undertaken purely on a national basis and that it concentrates on national campaigns. The results of such central work cannot reliably be extrapolated to local level and are unlikely to be dependable as the basis of IRMP assessments. There is, therefore, a need to develop local systems for the measurement of community fire safety effectiveness. FIRES is currently collaborating with the CFS Centre on the introduction of local surveys to assess and measure local CFS activity.

Local measurement of CFS effectiveness is limited and it is currently difficult, if not impossible, to show that a specific campaign or initiative has produced a measured benefit in terms of risk reduction or improved community awareness. Much of the results available can only be considered indicative and we are concerned that too much emphasis might be placed on potentially unreliable information.

## **Consultation**

With regard to Section 19(4) of the Fire Services Act, we agree that it is currently prohibitive but feel that there should remain some duty upon fire authorities to consult on alterations to the level of operational services. We believe it would have been preferable to have revised this section rather than repealed it.

The proposed approach appears to ignore the principle that organisational planning should be 'customer' focused, taking account of stakeholder opinion when developing plans. The suggestion that draft IRMPs need to be prepared prior to consultation is not compatible with that being expounded as the way forward for modernised public services.

We believe that some, albeit limited, consultation should be carried out during the preparation of draft IRMPs. This could reduce the risk of proposals being identified as totally unacceptable during a full consultation exercise whilst also avoiding wasted time and effort.

A large part of the consultation process will involve informing communities of the background to fire service response standards and the benefit of changing to a risk based approach. As it stands, each Brigade will need to develop an approach to educating stakeholders before seeking informed opinion. This Association believes that the most efficient way of preparing for consultation would be the adoption of a centralised advertising/education approach making use of national media to promote the IRM. The avoidance of duplicated effort and economies of scale must, we feel, represent a cost-effective solution which has the additional benefit of ensuring that a consistent message is delivered. It is considered necessary to guard against the influence of hidden agenda in the provision of information to stakeholders; any misinformation could skew perceptions thus becoming a destructive force against the IRMP process.

One to one consultation with members of the workforce would produce a much more favourable result in terms of change acceptance than would (in Brigades which do not recognise other trade unions for collective bargaining purposes) dependency on dialogue with the Fire Brigades Union. This has been shown in various employee surveys. Bypassing unions may cause some 'political' difficulties as it could be seen as bypassing the collective bargaining procedure. However, developing proposals through direct consultation with the workforce need not preclude consultation with unions prior to implementation. It should be noted that consultation on this basis should not mean extending a power of veto but views received must be included in the evidence accompanying any business case developed. There are many examples where firefighters' views are not necessarily the same as those reported by their representative body.

We are convinced that individual members of the service are much more receptive to change than is apparent. They also have many good ideas which could positively contribute to service development – these should not be ignored. Of course, there will be occasions when staff refuse to co-operate but these should not be used as an excuse to deny involvement opportunities.

An essential element in terms of consultation on IRMPs seems to have been omitted from the recommendations on who should be consulted. We feel that staff and their representative organisations must have some input into the process. As discussed above, consultation need not mean negotiation, but the staff who are to deliver any revised services must be afforded an opportunity to express their views, otherwise there will be no hope of restoring trust and creating a sense of partnership with management.

All trade unions whose members are liable to be affected should be included in a fire authority's list of consultees.

The guidance takes no cognisance of the information that is being gathered through the collaboration of the 49 brigades who use FIRES for their consultation work. We understand that Government cannot commend the services of a specific commercial provider, but we would recommend some acknowledgement that many brigades are collecting information and stakeholder opinions, through surveys covering areas such as Quality of Service and the opinions of employees, elected members and the public.

History shows that there is disparity between fire authorities in interpretation of current standards with regard to the number of fire stations and types of appliance. Removal of such standards could further increase the disparity. This gap is wholly dependent on the ability of each authority to withstand local opposition and the pressures created by publicity campaigns.

To assist each authority in overcoming such pressures the consent/consultation process should be maintained between local and national government.

## **Conclusion**

The Fire Officers' Association is committed to supporting the introduction and development of IRMP as we believe that the future of the fire service is dependent upon the cultural change that it represents.

We also believe that success will hinge upon the engagement of fire service staff at all levels. Showing that they can make a valuable contribution to improving public safety is likely to be a key factor and that a "what matters is what works" approach is being adopted by service leaders will go a long way to assisting delivery.

Another critical factor for success will be the ability to justify any changes to stakeholders, as support may not be forthcoming where assessment and decision-making processes are not transparent or supporting evidence not sufficiently robust.

It is our belief that unless there is a generic national standard to guide local authorities, a policy that allows each authority to set its own standard for intervention and prevention could take public protection back to a point just prior to World War II. In due course, the result of this could be the re-imposition of national standards.