



Chairman of the Hampshire Fire and Rescue
Authority

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12 March 2012

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Dear

**Hampshire Fire and Rescue Authority's Response to the Fire and Rescue Service
National Framework for England Consultation – December 2011**

Can I open by thanking you for the opportunity to respond to the draft National Framework document. Hampshire, as an ambitious and forward thinking Fire and Rescue Authority, is keen to work with Government to develop a set of clear expectations for the fire and rescue service which provide clarity, direction and also innovation and inspiration. The commitment to a Service, shaped locally, that both meets and reflects the needs of its community, is something which we wholeheartedly support.

Whilst acknowledging your set of questions, we prefer to respond by setting out a number of general observations and then cover detailed points in each chapter.

We welcome that this document is half the size of the previous one, and thus indicates a greater sense of professional self reliance and management is bestowed upon FRS's. The document is more detailed and directive in the area of national resilience than the last but less prescriptive in its policy direction. This latter point is understood to mark the change in relationship between the Government, Fire and Rescue Authorities and the communities they serve.

Chapter 1 – Safer Communities

- 1.3 The framework document widens the responsibility of the IRMP. It requires FRA's to identify and assess all fire and rescue related risks both within and across service borders, furthermore it should help to identify multi-authority and national risk. This new identification of national risks in the local IRMP is intended to highlight any gaps in service and contribute to the national risk assessment. This issue of addressing risk at both a local and national level appears to provide tension within the document. Whilst the document is promoting flexibility and local governance it is, at the same time, prescribing quite detailed obligations on FRAs and FRSs.

This new requirement of FRAs to not only identify and address local risk in their IRMP (by the use of prevention, protection and response activities), but also national ones, we consider, is not well articulated. The document discusses the identification of gaps in service, but singular FRS do not have sufficient oversight to provide that at a national level. Noticeably the proposed structural arrangements to coordinate the building of a national risk assessment and the associated mitigation, namely the: *Strategic Governance Arrangements for Fire and Rescue National Resilience*, does not appear in the document, but is subject to separate consultation (15/12/2011). The Authority's view is, that given the importance of these arrangements it should form part of the framework document.

The issues we raise surrounding sufficient oversight, gaps in service and structural arrangement, gives the impression of a rather disjointed approach. There is also no clarity as to how these gaps will be filled, or indeed how they will be funded.

- 1.6 The Authority fully supports the integration of prevention and protection activities within the IRMP to mitigate risk in communities. We see these areas of service as fundamentally important, not only in reducing community risk, but also in supporting economic prosperity and community growth. Furthermore we agree of the need to set out a management strategy based on risk for enforcing provisions of the Regulatory Reform (Fire Safety) Order 2005. Perhaps we might echo here that there's relatively little mention in comparison to resilience and response activities.
- 1.13 The section on response discusses interoperability between fire and rescue services supported by common communication systems, command and control, operational procedures and effective intelligence and data sharing. While we agree with the importance of this, we would contend government has a clear role in this and that DCLG, as the responsible government department, has a key part in working with Fire and Rescue Authorities to support this interoperability.
- 1.14 On a similar theme, Authorities are being requested to collaborate with other Category 1 and 2 responders. We feel it is unnecessary to state this as the requirements are already contained in other legislation.

- 1.19 The section regarding resilience is poorly explained, it covers existing requirements and is vague on new areas of policy. It calls for collective planning with other FRS to be included in the IRMP and collective arrangements with other FRS to manage risk. FRS are directed to work in partnership with the community both locally and nationally and also to have close collaboration with Category 1 and 2 responders. There are no specifics as to the limitations that will need to be set, the additional information required to allow this to happen or indeed the extent of this risks FRS's would be expected to address.

There is further repetition of the requirements imposed by other legislation contained within the document, particularly around effective response. For instance, it states that FRA must make provision to respond in their areas and other areas (mutual aid). These are already contained in the Fire and Rescue Services Act 2004 and the Civil Contingencies Act.

- 1.21 This section articulates that FRA's and Government need to work in partnership to meet potential gaps in capability. Again, whilst we are supportive in principle it is not clear how the proposed framework would operate and what limitations would apply.

We welcome the commitment to improved and continued resilience within the document and note the Government's recognition of the role it undertakes in national resilience. However, our overarching view is that the coordination between the Government and FRA is not thought through sufficiently to be articulated. We would welcome greater transparency as to FRA obligations.

Chapter 2 – Accountable to communities

- 2.1 The Authority applauds the strong and enduring theme in the document regarding accountability, scrutiny and assurance. Specifically, the intention to establish a transparent process which allows FRAs to be more self directing, locally engaged and consultative, particularly in relation to the development of its IRMP.
- 2.3 We are very supportive of communities being involved in the planning of their local fire and rescue service and evaluating the outcomes of its activities. We agree with the methodology that subsequent evaluation will form an important part of IRMP development. For this process to be supported FRSs will need to supply current, meaningful and accessible data on risk, together with evaluation protocols and methodology to the public. This, we agree, will expose the evidence base for decisions and reflect the priorities and expectation of local communities in the continual development of the IRMP. However, for this to be truly effective, standardised data sets, presented in a consistent way, will be necessary. How this coordination will be achieved is not articulated.
- 2.4 We consider it unnecessary to repeat that a FRA must hold their Chief Fire Officer/ Executive to account Fire and Rescue Authorities already take this role very seriously.

- 2.6 To support this new level of accountability, scrutiny and assurance changes to current FRA Member representation and oversight are suggested. However, there is little explanation as to the scope or extent of this new approach. This could create a considerable divergence between authorities in how this is achieved. For these reasons a more clearer explanation would be welcome to support this process.

Chapter 3 – Assurance

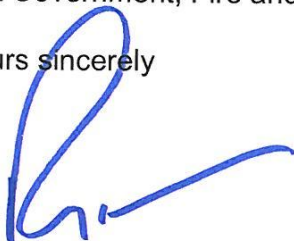
- 3.2 The section on assurance instructs FRS to publish annually on financial, governance and operational matters as set out in their IRMP. Moreover, assurance will be required from FRS working collectively to inform Government that risks are assessed, plans are in place and capability gaps have been identified. Again, little explanation is provided as to how this will be coordinated to ensure consistency of reporting.

Chapter 4 – Legislative context, timescale, scope

- 4.1 There are a number of expectations articulated in this chapter which are already prescribed in statute and therefore need little reiteration. This is particularly the case in relation to the Fire and Rescue Services Act, the role of the Local Resilience Forum under the Civil Contingencies Act and the Protocol on Engagement and Intervention in Poorly Performing Local Authorities. Indeed, the whole of chapter four seems to be largely a description of the statutory framework FRAs and their services work within. It would seem more appropriate to place this in an appendix.
- 4.9 The Authority notes that the national framework now has an open ended time scale, with the document stating it will apply for at least 3 years. It would support planning and efficiencies in FRS if Government could identify and communicate a likely duration or an intended review period.
- 4.10 In the section on scope, it identifies that the document only covers England. However, section 1.16 makes reference to FRS being directed to participate in cross border working with the Devolved Administrations. We wholeheartedly agree with the principle to support operational effectiveness and resilience but identify the Government will need to participate in dialogue to support this as, currently, authority does not exist elsewhere to compel this .

We hope that our contribution will be useful to Government in the formation of the new document, and look forward to a national framework that can provide the clarity and direction that Government, Fire and Rescue Authorities and their communities desire.

Yours sincerely



Royston Smith
Chairman