The Fire Brigades Union

Integrated Risk Management Planning

The Framework Document: How to construct an IRMP/RRP

A Message from Matt Wrack General Secretary

"The FBU supports the principle of IRMP"

"So far, integrated Risk Management Plans (IRMP) have, in practice, not delivered measurable improvements in service delivery. Not ones you can prove, not ones you can point to.

They are not integrated. Most are more budget-management than risk management. With some you would be hard-pressed to see the plan. Instead, with some exceptions, IRMP means CUTS.

Many IRMPs just contain vague promises of service improvement that are not quantified and often not delivered. Where there are improvements in service delivery these are often credited to the IRMP process whether it has played a role or not.

Despite this, the FBU supports the principle of IRMP.

The English and Scottish Governments and the Welsh Assembly have all written short guidance documents describing the IRMP process (Risk Reduction Plans – RRP in Wales – the Welsh Assembly made clear they wanted to reduce risk, not just manage it).

All these documents say that IRMPs/RRPs should be tools that balance the wishes and the needs of a wide range of stakeholders to deliver transparent management of a public service. True IRMP is therefore a process that, if done properly, leads to risk assessed, performance driven, cost effective improvement in fire and rescue service provision delivered by a safe, motivated workforce.

It is this principle that the FBU supports and wants to encourage.

Sadly, other than the brief notes provided by governments, there has been a lamentable lack of guidance on what integrated risk management planning is, and how it should be carried out. The FBU feels strongly that this is damaging the UK fire and rescue service.

Since no other stakeholder has been willing to step forward to fill this knowledge gap, as *the UK's leading organisation for fire and rescue practitioners*, the FBU felt obliged to step forward. The FBU has dedicated a considerable amount of resource into researching all aspects of IRMP that has culminated in the publication of this IRMP *Framework Document*.

This document is aimed primarily at FRS managers who are responsible for writing IRMPs/RRPs. It should also be read by members of fire authorities and fire boards who are responsible for the content of IRMPs/RRPs and thereby the performance of their fire and rescue services.

The FBU looks forward to a genuine dialogue within the service around this Document and around the development of IRMP and a Fire and rescue service for the future."

Matt Wrack
General Secretary
Fire Brigades Union

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Foreword

This document is divided into 3 parts.

Part 1: The first part is a summary of the whole document. It covers the main aspects of Part 2 of this document in just 12 pages.

It is intended that this summary should provide a brief overview of the role of this document and the IRMP process. This brief overview is intended for those who want a basic understanding of the IRMP framework without exploring the detailed issues associated with it.

Part 2: The second part of this document goes into detail. It is intended for those who need an in-depth understanding of the subject.

In particular, it is aimed at:

- Members of Fire & Rescue Authorities who are responsible for oversight of fire & rescue services.
- Senior managers in fire & rescue services
- Middle managers with responsibility for working on IRMP production.
- Fire Brigades Union officials with direct responsibility for IRMP co-ordination at brigade and regional level.

Part 3: The whole of this document is based on government guidance on the production of IRMPs (RRPs in Wales). The third part of this document therefore reproduces the relevant English, Scottish and Welsh guidance on the subject.

It is useful not only to read the guidance relevant to your own part of the UK, but to read the others as well. Looking at the similarities and differences is interesting, and there is no reason why ideas from one piece of national guidance shouldn't be used outside that nation if they are of value.

"By using this framework nationally, the ability to manage an FRS based on local need would not be restricted. The ability of FRSs to join together to face cross border challenges would be enhanced. What is more, while it is inevitable that industrial relations will always experience highs and lows, the transparency of the management process provided by this framework should mean that disputes over integrated risk management planning should be few in number and easy to resolve".

Terminology

In the UK, governmental responsibility for the fire and rescue service lies with a department of the main UK government in England. In Northern Ireland and Wales, responsibility lies with departments of the Northern Ireland and the Welsh Assemblies respectively. In Scotland, responsibility lies with a department of the Scottish Government.

This document is relevant to the whole of the UK, but when discussing the bodies with governmental control of fire and rescue services, the complexity of the situation means that there is no appropriate simple term that can be used to adequately describe all of them. "Devolved administrations" does not address the situation in England, "Regional Government" has a specific meaning in England. Strictly speaking, the term "government" is not appropriate for Wales or Northern Ireland but to prevent the text of this document becoming cumbersome, it is used throughout to refer to the appropriate department, government, assembly or administration.

In Wales, the process known as Integrated Risk Management Planning (IRMP) in England is known as Risk Reduction Planning (RRP). In Scotland the process is called Integrated Risk Management (IRM), the word "plan" or "planning" tends to follow the acronym IRM.

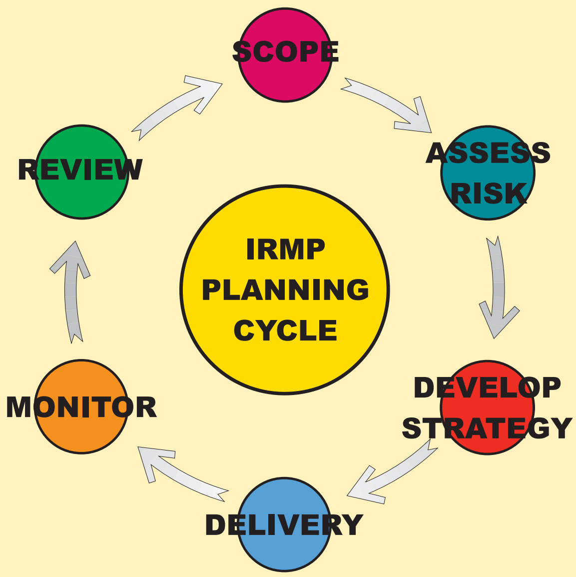
To prevent the text of this document becoming cumbersome, the English terminology is used primarily throughout this document except where it does not make sense to do so.

Finally, direct responsibility for fire and rescue services rests at local government level with a committee of elected councillors. In Scotland and Northern Ireland, these committees are known as Fire and Rescue Service Boards, Fire Boards, or Joint Fire Boards. In England and Wales they are known as Fire and Rescue Authorities or Combined Fire and Rescue Authorities except in London where they are known as the London Fire and Emergency Planning Authority (there are probably many other names besides).

Once again, the English terminology is used primarily throughout this document.

The author apologises for any offence that this might cause, but it is simply a matter of simplification to make the document easier to read.

Summary



Introduction

What is Integrated Risk Management Planning?

Business plans	Vision plans	Fire safety enforcement	Best value plans
Performance management plans	Financial plans	Action plans	
Risk registers	Regional management plans	Local area plans	
Community Plans (Scotland)	Strategic plans	Inter agency plans	
Attendance standards	Service plans	Improvement plans	FRS legislation
Preparedness for national resilience	National frameworks	Recruitment targets	
Firefighting	Community fire safety	Flooding	

Above are a few of the issues that make up the business of a fire and rescue service (FRS) and its objectives. From "business as usual" firefighting to preparing for national emergencies. From setting internal performance standards to external audit.

The questions are, which of the issues takes priority? Which are addressed first? Given the limited resources of the organisation, how much resource is allocated to each issue? With such a wide range of objectives, what direction should an FRS travel in?

The key to the answers is in the fact that in essence, all of the above are about **risk management**. The business and the objectives of an FRS are to manage risk within the community (individually, locally and nationally).

Once it is recognised that the problem facing FRSs is a plethora of risk management issues, it seems clear that the solution is to take them one by one, and to **plan** to address each one of them separately.

However, if each risk management problem is planned for separately, it is very likely that the same resources will be allocated to dealing with two or more issues – one of them will then not get addressed. In addition, it could be the case that some low risk issues are dealt with before the high risk ones.

The answer to all of this is to write down every risk management issue that is in the scope of the business of the

FRS, to risk assess each aspect, and to allocate resources in proportion to the risk. That is, to **integrate** all of the risk management plans.

At its simplest level, integrated risk management planning is just taking a planned approach to delivering the business activities of a fire and rescue service.

In this document, the process of integrated risk management planning is broken down into six steps. This approach is taken from the work of a group set up by the English government's IRMP Steering Group that reported in 2005. A very similar eight stage process was developed by the Welsh government.

Step 1: **Scope.** Identify all of the issues that are the business of the FRS. Identify all of the internal and external controlling factors that impact upon the FRS.

Step 2: **Risk assess** each of the issues that are in scope. How likely are they to materialise? how harmful are they? Prioritise them according to overall risk and determine a *performance outcome target* (the degree to which you would like the risk to be reduced).

Step 3: **Develop strategies** to reduce the risks. Identify the resources needed to deliver each strategy. Allocate resources according to the degree of risk. Identify the inputs and outputs of delivery strategies – if short term inputs and outputs are achieved, long term outcomes should be satisfactory.

Step 4: **Delivery.** Remember that people are the most important part of any delivery strategy, so to make sure that the strategies work, consult staff about the practicalities of delivery mechanisms.

Step 5: **Monitor** the whole process from step 1 to step 4. Constantly look for new risks and changes to existing risks. Monitor performance against inputs, outputs and outcomes.

Step 6: **Review** the process in the light of performance. Did the strategies deliver the performance outcomes? If so, continue with them, if not, develop new strategies for the next planning cycle.

Health and safety confusion

The *planned approach* to the delivery of FRS business involves <u>assessing the risks</u> posed to the community by the range of issues that are in scope. Confusion can arise because the issues that are in scope are all <u>risks</u>, and dealing with them is often a dangerous job that must itself be <u>risk assessed</u>.

To avoid confusion, it is important to distinguish between the business activities of an FRS (assessing and managing risks to the community) and the way an FRS has to carry out those activities (through safe systems of work that have been risk assessed).

The integrated risk management plan is an <u>outward</u> looking document that describes the community risks that are in its scope, explains the risks they pose, how they will be managed, and how successful performance will be assessed.

When deciding how strategies will be delivered, the FRS <u>must</u> produce an inward looking health and safety management policy that addresses the health and safety of employees. Thus, health and safety will be fully integrated into the IRMP even though they are two quite distinct processes.

- The health and safety policy should be based around the Health and Safety Executive's guide HSG65.
- The IRMP should be based around the principles of business planning and performance management.

Business Planning and Performance Management

If an IRMP is about planning the delivery of the business of an FRS, where does that leave *business plans*? The answer is that IRMPs *are* business plans.

In the Introduction of this document, this is backed up by definitions of business planning and performance management.

> An IRMP is a business plan for a fire and rescue service that is based on the principles of performance management.

NOTE: Guidance from the Scottish government actually states that integrated risk management planning requires performance management.

This document uses the term 'business planning' and talks about the 'business of an FRS'. However, it must be emphasised that an FRS is not a commercial enterprise, and should not be run along exactly the same lines. Like a commercial enterprise an FRS must be efficient and effective and must make best use of its resources, but unlike a commercial enterprise an FRS is a public service that must be available equitably ("fairly", which is not necessarily the same as "equally") to all and is free at the point of delivery.

In a commercial profit making enterprise such as a retail chain store, it would not make business sense to locate a shop in a remote hamlet with a small population. However in order to provide an equitable service to all, an FRS might have to provide a fire station. The meanings of some 'business' processes and terms such as "value for money" therefore need to be closely examined before they are applied to FRS management.

In this document:

- The term 'business planning' is used because it describes a well understood and well documented process of good management. It does not imply that an FRS is a commercial enterprise with the objective of financial gain.
- The term 'business of an FRS' refers to the "rightful concern or responsibility" of an FRS. It does not refer to any financial objectives.

Purpose of this document

It is not the purpose of this document to contain all of the information necessary to prepare an IRMP. It has just been established that an IRMP is in fact a business plan for an FRS incorporating the principles of performance management.

> This document uses key aspects of IRMP to describe a performance management business planning framework on which individual FRSs can build their own integrated risk management plans.

This document is intended for use primarily by FRS managers who are tasked with developing all or part of an IRMP, and by FBU officials who will be engaged in consultation throughout the process. It is also intended for elected members of fire and rescue authorities.

> For the IRMP process to work, it is essential that members of the fire and rescue authority imagine themselves to be non executive directors of a private company.
>
> Non-executive directors are the custodians of the governance process. They are not involved in the day-to-day running of business but monitor the executive activity and contribute to the development of strategy.

IRMPs (performance managed business plans) are an essential part of FRSs today because so much central control and direction has been removed. Up until the end of the last Century, the role of the FRS was largely set by legislation, conditions of service were inflexible and the detailed performance of the FRS was assessed externally. As a result, it was acceptable to manage FRSs 'behind closed doors'. It didn't matter what the public knew or didn't know about their local FRS, because all of its core activity was centrally controlled.

Today, there are no national minimum standards of fire cover; FRSs are free to pursue any activity they see fit that supports a broad national framework or local objectives; they set their own performance standards; such guidance as is issued from the centre is explicitly not mandatory; audit of overall performance is carried out externally, but audit of frontline practice is largely carried out by self assessment and peer review. Today, FRSs can no longer be managed 'behind closed doors'. Today FRSs are much more answerable to local government and the population they serve. The whole process of running an FRS must be open, transparent and founded on informed public consultation.

> IRMP is the vehicle by which open and transparent management should be delivered. The purpose of this document is to describe the IRMP process, or framework. Once the framework has been constructed, the detail of what goes onto it is entirely down to the discretion of local management, local need, negotiation and consultation.

Vision statements – v – focused risk reduction plan

In early IRMPs it isn't hard to find "key objectives" along the lines of:

> "*We will continue to improve our intervention services to further reduce the impact of fire on the community*"

Few people would argue that this is not a good idea, but it is a vision, it isn't a performance managed outcome of a risk assessed plan.

If the IRMP is a high level corporate vision instead of a practical, performance based business plan, the delivery of the fundamental core business of the FRS will be entirely in the hands of individual employees, rather than being the subject of corporate control. At best, if corporate control is operated (but outside of the IRMP process), the delivery of the fundamental core business of the FRS will be a private matter between FRS managers and FRA Members – which is an equally unacceptable situation.

Chapter 1 – Scope

Identifying the scope of an IRMP means identifying the factors that have a bearing upon the business of an FRS locally, regionally and nationally. To use the terminology of business management planning, it is a process of defining the business and its objectives. These might include:

- Fire and rescue services to the local community
- Services across geographical boundaries
- Fire & Rescue Service legislation and National Frameworks
- Civil Contingencies Act 2004.
- Local government legislation, partnership working
- Best value and financial controls.
- Local policies
- Regional policies
- National policies
- International interfaces (such as cross border working between England and Scotland and possibly involvement in EU or wider disaster relief efforts)
- Legislative enforcement
- Compliance with legislative obligations
- Corporate responsibilities
- Social responsibilities
- Response commitments (The types of emergency incident that will be responded to)
- Stakeholder's expectations

These business processes need to be further refined into specific activities so that performance standards can be determined, and so that delivery strategies can be agreed and resourced.

Response commitments might be refined into:

- Dwelling fires
- Industrial fires
- Historic buildings
- Education establishments
- Community buildings
- Environmental/pollution risks
- Wildfire incidents
- Hazardous material incidents
- Rescue from height
- Animal rescue
- Lift rescue
- Water rescue
- Wide-scale wind damage
- Extrication from machinery
- Road traffic collisions
- Rail incidents
- Shipping incidents
- Aircraft incidents
- Terrorist incidents
- Building collapse
- Arson as a special case

Dwelling fires might be further refined into:

- Multi-occupied
- Low rise
- Medium rise
- High rise
- Underground

Scoping the IRMP is only the first stage of the process. At this stage, the FRS is not committing itself to any particular activity. The IRMP process is an iterative one whereby a facet of community risk may be considered to be in scope, but may be later disregarded when the level of risk is assessed at stage 2 (risk assessment), or may be re-evaluated at stage 3 (strategy development) if an appropriate strategy cannot be identified.

Chapter 2 – Assess Risk

In order to efficiently and effectively deliver risk management services to a community, an FRS must first assess the level of risk presented by each of the issues that are 'in scope'.

Likelihood of occurrence

Step 1: Collect data to show the number of times the event has occurred in the past.

Step 2: Use mathematical techniques and subjective judgement to predict future occurrences.

Document such as the English CLG publication *Fire and Rescue Service partnership working toolkit for Local Area Agreements* gives some useful basic guidance on techniques that may be used. However the analysis of statistical data for the preparation of a business plan for a multi-million pound organisation like an FRS should not be carried out by anyone who needs basic guidance from government publications. If the FRS does not employ someone who is competent, the work should be contracted out to a specialist.

Impact of the event

Only life loss, injury and property damage are taken into account by fire and rescue computer risk models. When assessing the impact of an emergency event, all of the following factors should be considered:

- Life loss
- Injury
- Property damage
- Building fabric
- Building contents
- Heritage loss (both built and natural)
- Business interruption
- Direct impact on premise
- Indirect impact (e.g. effect of fire on nearby transport infrastructure)
- Environmental damage
- Social impact
- Economic impact
- Effect on community cohesion and sustainability

Combining likelihood and impact – prioritisation

> The FRS should accept that the "fear of fire" is as real as fire itself, and that recognising this fact helps identify priorities that are not revealed by incident data.
>
> 'Value for money' should only be used as a tool to select the most cost-effective way of reducing individual risk.

The function of the IRMP process is simply to be honest and transparent about the service proposed. The consultation stage of the IRMP process has to highlight the difference between;

(a) true efficiency savings, and

(b) cuts in services that are forced on the FRS as a result of budgetary constraints.

If providing value for money means providing a lower level of service because less money is available, IRMP consultation has to say so. It is the only way that the public can be sufficiently informed to make choices about the services they receive and what they are prepared to pay for them.

Performance measurement

At the risk assessment stage, not only must the actual overall risk be identified, but also performance targets must be set for the *degree of risk reduction*.

The *degree of risk reduction* is the out<u>come</u> of a delivery strategy, but <u>in</u>puts and <u>outputs</u> as well as out<u>comes</u> all have to be measured in order to monitor the performance of an FRS.

It would appear that performance measurement should be described under the heading *monitor* rather than *risk assessment*, however in order to monitor a process, it is necessary to have a predetermined performance standard against which to compare delivery.

Also, in order to develop a *delivery strategy*, it is necessary to have a performance standard to aspire to in order to set the level of delivery. Unlike simple health and safety risk assessments, the out<u>come</u> of an FRS delivery strategy is unlikely to be the complete elimination of risk or the immediate reduction of risk to an 'acceptable level'.

Hence, performance standards in terms of outcomes must be set at the risk assessment stage.

Performance standards in terms of outputs and inputs must also be set before monitoring can take place, but these can only be set once a strategy has been developed.

Chapter 3 – Develop Strategy

When selecting a strategy to address a risk for the first time, the FRS effectively has a free hand to do whatever they think will be most effective and will encompass all of the controlling/limiting legislation.

When selecting a strategy for an existing risk that has already gone through one IRMP cycle, the FRS must take account of the actual measured effectiveness of past strategies. Strategies that have been tried in the past, but have failed to deliver the desired performance measures cannot be continued. Either:

(a) The existing strategy must be amended and improved.

(b) A new strategy must be developed that is more likely to succeed.

(c) Less challenging targets should be set for the next IRMP cycle.

Option (c) is effectively an admission that either poor judgement was applied in selecting the initial targets or that the FRS is 'giving up' on proactively attempting to improve its service delivery. Selecting this third option is therefore not a decision that can be made by managers in an FRS. It should only ever happen after informed debate between senior FRS managers, key stakeholders and elected members at Fire and Rescue Authority level.

Selecting strategies

Typically, strategies for dealing with response commitments can broadly be divided into three areas:

- Prevention
- Protection
- Intervention

Other potential strategies are:

- Do nothing
- Limited intervention
- Sharing the management of risk

Health and safety

Delivery strategies cannot be developed in a 'bubble' that excludes health and safety. Health and safety must be woven into every activity of an FRS. Every delivery strategy must have its health and safety implications taken into account when it is considered, and health and safety must be an integral part of every delivery strategy that is adopted.

Through the FBU, the FRS has the opportunity to draw on the combined experiences of the majority of its workforce when considering the health and safety implications of potential systems of service delivery work.

Selecting delivery strategies

Fire prevention and protection

Prevention and protection strategies can be split between domestic/residential fire and commercial/industrial fire. The delivery of commercial/industrial fire safety is mainly through the provision of advice and the enforcement of 'new fire safety legislation'.

New fire safety legislation makes a 'responsible person' responsible in law for compliance, but the FRS still has responsibility to deliver fire safety to people, property and the environment by actively and effectively overseeing compliance.

Arson reduction is normally treated as a 'special case' through specific 'arson reduction strategies'.

Strategies at a national level such as involvement in BSI committees and the drafting of regulations can have a significant effect on local risk.

Intervention

Intervention strategies must include the role played by call receiving and handling as well as speed and weight of attack. The attendance standards that will form part of the intervention strategy must be drawn up in co-operation with neighbouring FRSs and FRSs in the same family group. This is because while IRMP is about addressing local needs, the FRS nationally would be harmed by accusations of being a 'post code lottery'.

Any proposed intervention strategy must take account of the need for appropriate operational guidance, workforce skills and resources before it is adopted.

Responding to an incident that was not considered when developing the scope of the IRMP is understandable as long as training, equipment, procedures and high quality supervision ensure that the risk is dynamically assessed, and the principles of the 'safe person' are adopted. This does not mean that reasonably foreseeable incidents can be ignored when considering the scope of the IRMP in order to 'get around' the need for developing a strategy.

Setting performance standards

Broad outcome performance standards are set during the risk assessment stage of the IRMP cycle. Once a strategy has been selected for dealing with a response commitment, it is necessary to set input and output performance measures that will ensure that the desired outcomes will be achieved.

Presentation

It is not uncommon for IRMP documents to attempt to fulfil a public information function, but in the attempt to be a 'glossy brochure', they then fall short of being a 'business plan'. The aim should be one job, one document.

Two categories of document are required by the end of this stage of the IRMP process:

- Consultation documents about scope and risk philosophy
- draft plans.

Following the consultation stage on the draft plan, a further two documents should be produced:

- IRMPs and Annual Plans (publicly available but for internal use).
- 'Glossy brochures' presenting the actual service provided.

Chapter 4 – Delivery

Consider human factors

It is often the case that the reason for incorrect implementation of strategies is that systems, rules, procedures or instructions are not complied with. There are many reasons why this might occur, but the underlying causes often lie in systems that are designed without taking proper account of human factors.

By far the most effective way of ensuring that delivery mechanisms take proper account of human factors is to involve employees in the process of developing those mechanisms.

The next step

The FRS is a labour intensive industry where every service delivered involves direct contact between employees and the public. As a result, while an adequate service will be delivered if employees' experiences have been incorporated into delivery mechanisms, the best services will be delivered by employees who are motivated, enthusiastic and who feel valued by their employer.

This means that even staffing policies must be assessed under the umbrella of IRMP in terms of their impact on motivation and morale. Policies that have an adverse effect on motivation and morale are likely to have an adverse effect on service delivery and consequently on the outcomes of the IRMP. The adoption of policies that value and respect staff, such as genuine family friendly policies, will have positive effects that will filter through to better service delivery.

Chapter 5 – Monitor

Outcome performance measures are set at the risk assessment stage of the IRMP cycle.

Output and input performance measures are set at the strategy development stage.

The FRS should be continuously monitoring its environment in order to make sure that the scope of its IRMP is still reflective of the environment in which it operates.

Inputs and outputs of the delivery mechanism must be monitored to ensure that the strategy is likely to deliver the outcomes.

- It may be that a different strategy needs to be considered.
- The delivery mechanism may not be functioning as intended.

Monitoring is a continuous process that operates at every level from the broad scope of the IRMP right down to the detail of delivery mechanisms.

Incident investigation

In the medium and long term, monitoring performance by comparing numerical indicators against pre-set standards is essential. In the short term, it should be recognised that emergency incidents also represent an opportunity to monitor the effectiveness of a wide range of strategies.

Fire investigations examine the cause and effect of fires. *Incident* investigation can be used as an opportunity to monitor anything from intervention strategies to prevention strategies, the sufficiency of the enforcement of new fire safety legislation, the breadth of the scope of the IRMP, the effect of human factors on delivery mechanisms and many more besides.

Incident investigation must examine such things as:

- The immediate cause of the incident
- The underlying cause of the incident

- The reason/s for escalation of the incident
- The harm caused by the incident (was it in line with the IRMP assessment of risk?)
- The suitability of the control strategy
- The adequacy of systems for gathering tactical information
- The effectiveness of the legislative enforcement strategy
- The implementation of the control strategy
- The effectiveness of the intervention delivery mechanism
- Compliance with controls such as health and safety and environmental pollution

Chapter 6 – Review

It seems that it should not be worth saying that *the purpose of applying performance management to a business plan is to gather information to be fed back into a review of the business plan so that each successive plan is better than the last*. However, Chapter 6 of this document describes some of the many examples in which second and subsequent IRMPs have not been developments of past plans.

Performance targets must be described in each IRMP. In the subsequent plans, the performance of the FRS must be measured against those targets. To do otherwise is to mislead the public.

If performance targets are not achieved, new delivery strategies must be developed for the new IRMP cycle. To set lower targets and then continue with the same delivery strategy is an admission of defeat. The IRMP belongs to the Fire & Rescue Authority, and their informed approval is essential before targets can be lowered for this reason.

A cycle, not a repeated linear process

There are many examples in early IRMPs where past performance targets are not mentioned in later plans, and where missing a performance target has simply resulted in a lower target being set for the future.

In these cases, IRMP is being treated as a linear process with *monitoring* at the end, but with no attempt to feed the results of that monitoring into the next IRMP. The next IRMP is written from scratch, with little more than a passing mention of what was promised by the previous plan, let alone how well it was delivered.

However, IRMP planning is a cycle. The findings from the **monitoring** of performance must be fed into a **review** of the existing plan so that the next plan is an improvement on its predecessor.

Chapter 7 – Conclusion

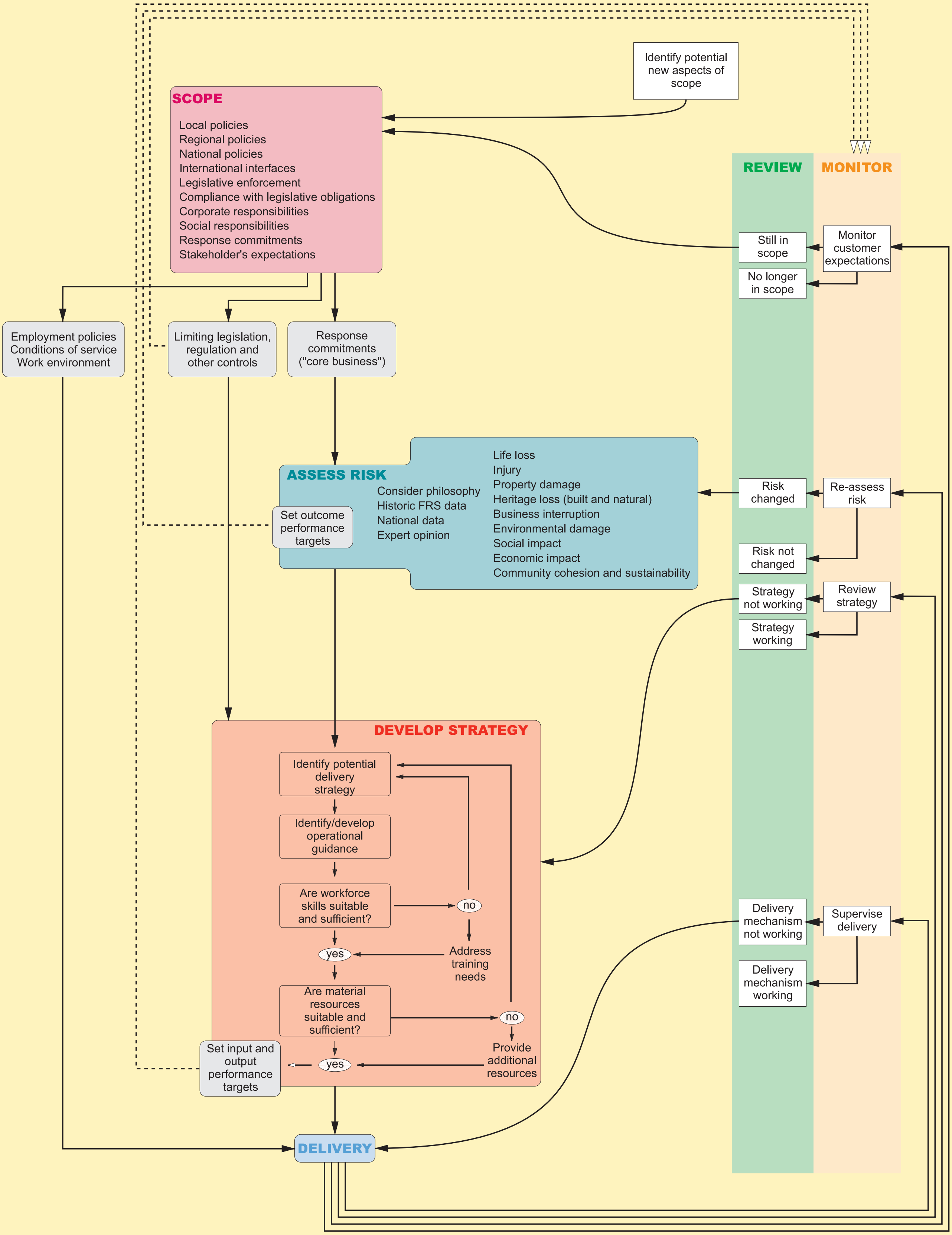


Figure i: The IRMP framework with key points included

The process

The FBU firmly believes in and supports the process of IRMP as described in all of the current national guidance documents. The FBU wants to work with fire and rescue authorities, FRSs and governments to implement and to further develop the IRMP process.

Where the FBU has in the past come into conflict with others over the content of IRMPs, it has almost always been the case that if national guidance documents had been followed in full, either the contentious content of the IRMP would never have been included, or the conflict could have been resolved more quickly.

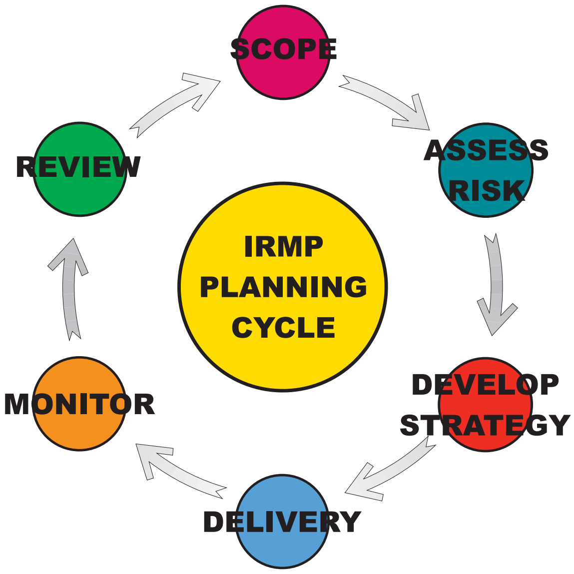
This document as part of the process

To produce a universally applicable document that presents a full detailed explanation of the IRMP process would neither be desirable nor possible. Such a document would have to describe business planning and performance management processes that could be applied to every UK FRS.

Instead of producing such a comprehensive document, the FBU has therefore produced this document, illustrated by examples, summarised in Figure i, to show how locally identified business planning and performance management agendas can be attached onto a common framework.

By using this framework nationally, the ability to manage an FRS based on local need would not be restricted. The ability of FRSs to join together to face cross border challenges would be enhanced. What is more, while it is inevitable that industrial relations will always experience highs and lows, the transparency of the management process provided by this framework should mean that disputes over integrated risk management planning should be few in number and easy to resolve.

Introduction



1 What is Integrated Risk Management Planning?

1.1 Business Planning

It seems obvious to say so, but it is worth emphasising that the 'business' of a fire and rescue service is to provide fire and rescue services to a community. The implication of this is that 'business planning' in a fire and rescue service means planning for the provision of fire and rescue services to a community.

According to Business Link, a government-funded service designed to promote enterprise:

> "A *business plan is a written document that describes a business, its objectives, its strategies, the market it is in and its financial forecasts. It has many functions, from securing external funding to measuring success within your business*".
>
> "*Once you've drawn up your new business plan and put it into practice, it needs to be continually monitored to make sure the objectives are being achieved. This review process should follow an assessment of your progress to date and an analysis of the most promising ways to develop your business*".

1.2 Performance Management

According to the Office of Government Commerce, an independent office of HM Treasury, established to help Government deliver best value from its spending:

> "*Performance management is the activity of tracking performance against targets and identifying opportunities for improvement – but not just looking back at past performance. The focus of performance management is the future – what do you need to be able to do and how can you do things better? Managing performance is about managing for results. Performance-based management at any level in the organisation should demonstrate that:*
>
> - *you know what you are aiming for*
> - *you know what you have to do to meet your objectives*
> - *you know how to measure progress towards your objectives*
> - *you can detect performance problems and remedy them*".

1.3 Integrated Risk Management Planning

Compare these descriptions of business planning and performance management with the process of Integrated Risk Management Planning (IRMP) as described by governments:

According to Fire and Resilience Guidance Note 1 published by English government and the guidance produced by the Scottish government:

The government thinks effective IRMPs will do the following fundamental things:

- identify existing and potential risks to the community within the authority area
- evaluate the effectiveness of current preventative and response arrangements
- identify opportunities for improvement and determine policies and standards for prevention and intervention
- determine resource requirements to meet these policies and standards

In 2005, the English government set up an IRMP Steering Group that mapped out a 6 stage Integrated Risk Management Planning Cycle (Figure 1):

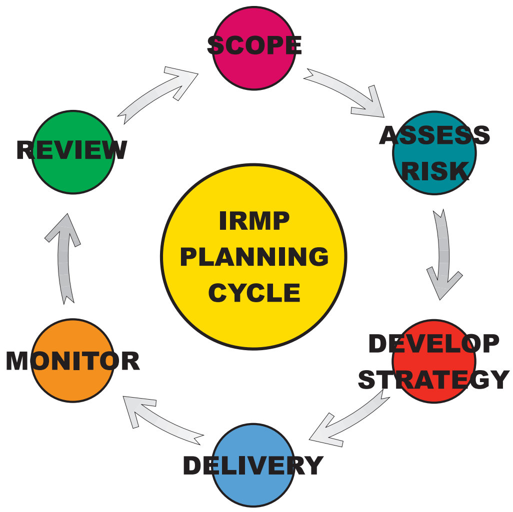


Figure 1. IRMP Planning Cycle

In Wales, a similar 8 stage process is described in the guidance (Figure 2):

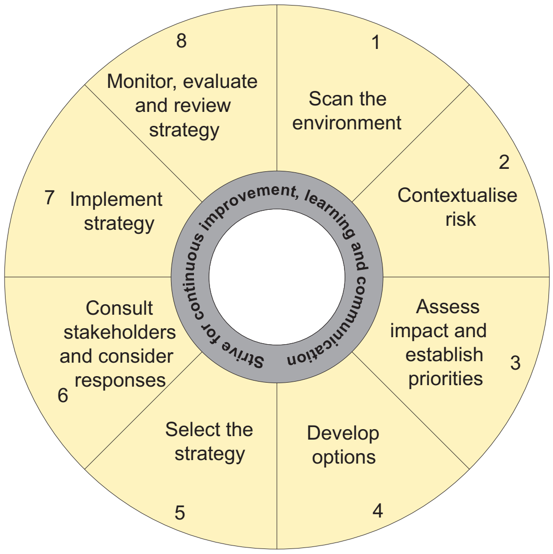


Figure 2. RRP Planning Cycle

Clearly, the differences between business planning/performance management and integrated risk management planning are so small as to make them indistinguishable. **An IRMP is a business plan for a fire and rescue service that is based on the principles of performance management.**

NOTE: Guidance from the Scottish government actually states that integrated risk management planning requires performance management.

2 UK dimension of this document

Governmental responsibility for fire and rescue services has been devolved to the Assemblies in Northern Ireland and Wales to the Scottish Government. In England, Communities and Local Government (CLG) is now responsible for fire and rescue services however at the time IRMP was introduced, it was the Office of the Deputy Prime Minister (ODPM). Each government produced its own guidance on IRMP.

NOTE: In Wales, the IRMP process is renamed as *Risk Reduction Planning* (RRP).

This document is intended to be applicable to all parts of the UK, so where appropriate it draws on all sources of guidance.

(a) It is important that stakeholders know the specific guidance provided by their own government.

(b) While the detail may be different in different pieces of guidance, the underlying process is the same.

(c) Each part of the UK can learn from the differences in emphasis which other administrations place on different parts of the process

The full text of the English, Scottish and Welsh guidance is reproduced as Appendices to this document.

3 Definition of IRMP

According to English Fire Service Circular 25/2007:

The IRMP definition endorsed by the IRMP Steering Group is:

> "Integrated Risk Management Planning (IRMP) is an holistic, modern and flexible process, supported by legislation and guidance, to identify, measure and mitigate the social and economic impact that fire and other emergencies can be expected to have on individuals, communities, commerce, industry, the environment and heritage. FRA's when establishing local options for risk reduction and management within annual Action Plans, must take account of the duties and responsibilities outlined in the National Framework, the section 9 Emergency Services Order, the Civil Contingencies Act, and the Regulatory Reform (Fire Safety) Order.
>
> This places emphasis on flexibility and partnership, working on local, cross border and regional planning for prevention and intervention activities to save and protect life and to reduce the economic and environmental impact of fire to the community. Through this partnership approach IRMP should deliver a proportionate response, that is evidenced based, which will ensure efficiency".

In general, other government publications describe *what an* IRMP/RRP *should do*, but they do not attempt to offer a succinct definition of *what an* IRMP/RRP *is*.

4 Fitting IRMP into other corporate documents

4.1 Plan to succeed

Current business practice encourages a plethora of corporate documents:

- Business plans;

- Vision plans;
- Best value plans;
- Performance management plans;
- Financial plans;
- Action plans;
- Risk registers;
- Regional management plans;
- Local area plans;
- Community Plans (Scotland);
- Strategic plans;
- Inter agency plans;
- Service plans;
- Improvement plans;

to name but a few.

The question is, is an integrated risk management plan just another that sits alongside these other plans, is it subordinate to one or more of these other plans, or is it an overarching plan that encompasses everything else?

To answer this question, it is necessary to consider the purpose of IRMP.

4.2 Purpose of IRMP

Up until the end of the last Century, FRSs were obliged to have systems for receiving emergency calls, to attend fires, and to give fire safety advice. National minimum standards of fire cover and other performance indicators were set centrally; operational 'guidance' and 'advice' was regularly issued from the centre; conditions of service were national and inflexible; Her Majesty's Inspectorate of Fire Services made sure that service delivery standards and corporate business standards were met.

In truth, there was more to FRSs than this simple thumbnail picture presents, and there was a large amount of flexibility in how FRSs operated, but at its core, the role of the FRS was set externally, and the performance of the FRS was assessed externally.

Today, there are no national minimum standards of fire cover; FRSs are free to pursue any activity they see fit that supports a broad National Framework; they set their own performance standards; such guidance as is issued from the centre is explicitly not mandatory; audit of overall performance is carried out externally, but audit of frontline practice is largely carried out by self assessment and peer review.

Again, this is a simplified view for brevity, but the truth remains that the narrow path that FRSs were forced to follow from one year to the next has been replaced by an open expanse of land with many objectives on the horizon, and few signposts. Today, FRSs have to show a "direction of travel", but in reality, they must move in the direction of FRS legislation, preparedness for national resilience, national framework requirements, recruitment targets and many more besides. With limited resources, it is not always possible to move in so many directions at the same time. So how does today's FRS know that it is travelling in the best direction to achieve all of its objectives? The answer is IRMP.

To revisit advice already quoted, the purpose of IRMP is "*to identify, measure and mitigate the social and economic impact that fire and other emergencies can be expected to have on individuals, communities, commerce, industry, the environment and heritage*".

This is achieved by producing plans that:

- *identify existing and potential risks to the community within the authority area*
- *evaluate the effectiveness of current preventative and response arrangements*

- *identify opportunities for improvement and determine policies and standards for prevention and intervention*
- *determine resource requirements to meet these policies and standards*

An IRMP is therefore a practical document that describes the "core business" that an FRS intends to provide to its "customers". It describes the resources it will dedicate to the provision of those services as well as the standards that those services will aim to achieve. An IRMP replaces all of the checks and balances that controlled the FRS in the past.

Finally, it is important to remember that the historical central control of the FRS has not been handed over to FRS managers. It has been handed over to FRA members and other stakeholders in the FRS. As such, the preparation of an IRMP must take account of informed stakeholder views, and the presentation of an IRMP must be transparent to all.

4.3 Interaction with other plans

Understanding that an IRMP is a practical document about the delivery of core business clarifies how it should fit in with other corporate documents such as those listed in 4.1 above.

To deal with "visions" first. Core business should be directed to delivering vision, so vision statements should precede IRMP. But any vision must be bounded by whatever is in the scope of core business, so IRMP should precede vision statements. This is a paradox. Practically speaking though, visions (and missions) are valuable guides for business, but they are typically so loosely worded that this chicken and egg situation is not a real problem. Competent and experienced FRS managers should be able to develop realistic vision statements at any time in the business cycle.

What is important to recognise is that "visions" have no place in IRMPs. Government guidance is that an IRMP should "*identify opportunities for improvement and determine policies and standards for prevention and intervention*". But this function is not delivered by putting "key objectives" into IRMPs such as:

> "*To develop partnerships through a* Community Safety Strategy *that will deliver sustainable living*".

Such an objective is far too vague and "visionary" to have a place in a practical document about the delivery of core business. Key objectives in IRMPs must be practical, deliverable, clearly resourced and have a stated benefit to the community, they must address an assessed risk and must have quantified performance outcomes.

Financial plans: It is impossible to plan the finances of an FRS unless the core business activities are known, but it is impossible to plan the extent of core business unless financial limitations are known. However unlike vision statements, financial plans are not vague and loosely worded, so this chicken and egg situation is a problem. Financial plans must work in tandem with IRMPs.

Regional plans, plans for working with strategic partners, improvement plans, and similar are all plans that are targeted at reducing the risk to the community, and delivering opportunities for improvements in the way that risk reduction is delivered. If several such documents are prepared as 'stand alone documents', their objectives can conflict, and their demand on resources will almost certainly conflict. It is therefore necessary to integrate all such risk management plans.

> **It is self evident that the best way to integrate a series of risk management plans is to incorporate them all into a single *Integrated Risk Management Plan*.**

Indeed, the Welsh guidance on Risk Reduction Planning recognises this issue when it says:

> "*Adopting this* [RRP *guidance*] *framework allows the* FRA *to allocate resources against known or foreseen risk, whilst considering other competing demands*".

In some of the organisations operating this good practice this interaction has been recognised and they combine business plans with the IRMP into a community safety plan that incorporates changes to structure.

5 Purpose of this document

In 2004, the FBU published *Integrated Risk Management Planning The National Document*. This present document does not replace or supersede that 2004 publication.

The 2004 publication was produced in the early days of IRMP. It described in detail the history that led up to IRMP and the background to the process of IRMP. It also described many of the issues that need to be taken into account to get the process right. Finally, it described the cost of getting the process wrong, and presented some solutions for the delivery of intervention services.

While some of the references in that publication are now out of date (for example the Fire Precautions Act and the Workplace Regulations have now been replaced by new fire safety legislation[1]), its broad message remains intact.

The intended purpose of this present document is quite different from that of the 2004 publication. All FRSs have produced several iterations of IRMP since 2004 and much has been learned about the process by FRSs, governments, and the FBU. In addition, the environment in which FRSs operate has changed particularly in terms of IRMP guidance from governments and the mechanisms of external audit of performance.

It is not the purpose of this document to contain all of the information necessary to prepare an IRMP. It has just been established that an IRMP is in fact a business plan for an FRS incorporating the principles of performance management. Business planning is a vast subject that cannot be described adequately in one brief document, and even though their core functions are the same, every FRS in the UK is different and it is certainly not realistic to present all of the information that every UK FRS requires in order to produce its own individual IRMP. Equally, there are many different performance management models available. It is impossible to describe them all, and to select one particular model for inclusion in a document such as this would be inappropriate.

> This document uses key aspects of IRMP to describe a performance management business planning framework on which individual FRSs can build their own integrated risk management plans.

5.1 Background reading

There are many other documents and publications that are essential reading for anyone who is actively involved in the production of an IRMP, however key publications that must be read in order to understand the IRMP planning framework described here are the various government's guidance documents that are reproduced at the back of this document as appendices 1 to 4.

6 Audience

This document is intended for use primarily by FRS managers who are tasked with developing all or part of an IRMP, and by FBU officials who will be engaged in consultation throughout the process. It is also intended for elected members of fire and rescue authorities.

> Elected members of fire and rescue authorities should turn towards the back of this document and read Section 7.2 before going any further.

7 The cost of getting it wrong

This section is not concerned with getting the detailed IRMP process wrong. If the remainder of this document is followed, that will not happen. Instead, it is concerned with the more fundamental issue of getting the whole

[1] The Regulatory Reform (Fire Safety) Order 2005, The Fire Safety (Scotland) Regulations 2006 and the Fire and Rescue Services (Northern Ireland) Order 2006.

concept of IRMP wrong, failing to recognise what an IRMP is and failing to integrate risk management planning properly with business planning and other corporate documents.

As stated above, since its introduction, much has been learned about the IRMP process by FRSs, governments, and the FBU. Two common themes that are noticeable in early IRMPs is that they are written as "just another corporate plan", and that their objectives tend towards loosely worded vision statements, rather than focused risk reduction plans.

7.1 Just another corporate plan

FRSs must prepare for the high level risks identified in Community Risk Registers. In Scotland, FRSs must deliver Scotland's 15 N*ational Outcomes*. In Wales, Risk Reduction Plans must integrate with the wider public service agendas for Wales. In England FRSs must enter into Local Strategic Partnerships and thereby deliver the goals of Local Area Agreements. FRSs must consider the demands of regional and national resilience planning. All the while, they must deliver 'bread and butter' risk management services to their local communities.

It is impossible for a single organisation to plan properly to address all of these demands by preparing separate documents. At the very least, attempting to do so inevitably leads to clashes in demands for resources. This means that some projects do not get delivered. What is more, because the various plans are not connected and their objectives have not been compared and prioritised, it can be the case that it is the more critical objectives that do not get delivered.

High level inter agency plans and plans for regional issues are under frequent scrutiny from peer organisations. 'Bread and butter' risk management services to the local community are not. It is therefore inevitable that the temptation will exist to (for example) commit scarce resources to *aligning the organisation with the County Council's Customer Care Policy*, and thereby postponing the project to set *an attendance time standard for special service incidents that will reduce their impact on the community*.

As well as integrating wider issues into the organization, the IRMP should be the document that provides a focus for the delivery of the fundamental core business of the FRS.

7.2 Vision statements – v – focused risk reduction plan

In early IRMPs it isn't hard to find "key objectives" along the lines of:

> *"We will continue to improve our intervention services to further reduce the impact of fire on the community"*.

Few people would argue that this is not a good idea, but it isn't a plan.

- How good are intervention services currently?
- What is the current impact of fire on the community?
- By how much will the impact of fire be reduced?
- How long will it take to achieve the reduction?
- What are the resource implications?
- What are the training implications for staff?
- How much will it cost?
- Is there an equality and diversity impact?
- What is the health and safety impact?
- How will the reduction in impact be measured?

By mistaking visions for plans, IRMPs fail to be an adequate replacement for the missing checks and balances described in 4.2 above.

- With no tangible targets, at the end of the IRMP cycle the FRS is free to describe almost anything as being evidence of successfully achieving the objective.

- Without any assessment of the resource implications, it is quite possible that the objective may have to be shelved anyway.
- Worse than shelving the proposal, pushing forward with such a broad proposal could be dangerous if it is under resourced, staff don't receive sufficient training, and health and safety implications are not embedded.

If the IRMP is a high level corporate vision instead of a practical, performance based business plan, the delivery of the fundamental core business of the FRS will be entirely in the hands of individual employees, rather than being the subject of corporate control. At best, if corporate control is operated (but outside of the IRMP process), the delivery of the fundamental core business of the FRS will be a private matter between FRS managers and FRA Members – which is an equally unacceptable situation.

As long as men and women put on fire kit and go to emergencies, or are given public buildings and workplaces to inspect, their ingenuity and commitment will cause them to 'get the job done'. But the dedication of employees can only go so far in compensating for a lack of corporate control. It is an old adage that *failing to plan is planning to fail*. Failing to plan the core business of an FRS means planning to fail to reduce risk to the community and planning to fail to ensure safe systems of work for employees.

A report by WS Atkins for the HSE looked at the various techniques available for establishing the underlying or root causes of an incident. The report warned that:

> "*It is only by adopting investigation techniques which explicitly identify root causes, i.e. the reasons <u>why</u> an incident occurred, that organisations may learn from past failures and avoid similar incidents in the future*".

The definition of a root cause is:

> "*the most basic cause that can be reasonably identified and that management has control to fix*". *Basic cause refers to the* "*specific reasons as to why an incident occurred that enable recommendations to be made which will prevent recurrence of the events leading up to the incident*".

The report argued that the root causes of an incident are to be found at the highest level of management, including policy, organisation, planning and implementation, measurement of performance and review of performance. In other words, Integrated Risk Management Planning.

7.3 Must

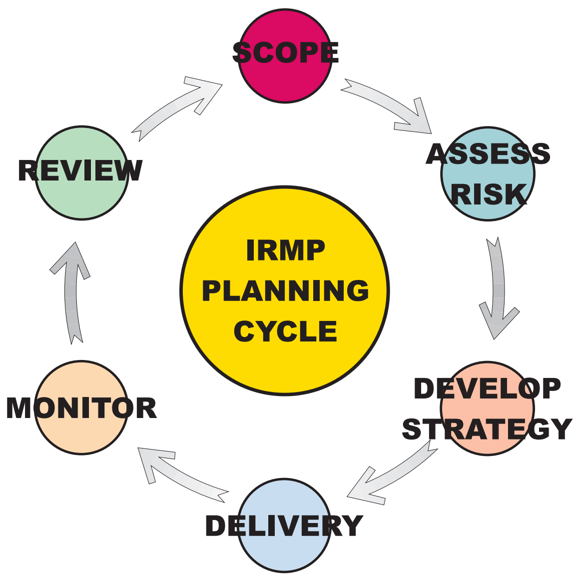
The word "must" appears several times in this document. In the present climate in which the delivery of local services is left to local government with minimal intervention from government (especially in England), the word "must", coming from an external source, is an anathema to some FRS managers and FRA members. Its use therefore has to be explained at an early stage.

In this document, "must" simply precedes actions that need to be taken in order to construct the IRMP framework that is being described. Once the framework has been properly constructed (by taking all the steps that *must* be taken), there is still complete freedom to select the detail of what is attached to it. What is attached to the framework is entirely down to the discretion of local management, local need, negotiation and consultation.

By way of an analogy: *When designing a central heating system for a house, you* ***must*** *include a device for heating water*. The choice of device is up to you. You could design a 'traditional' central heating system by using a gas boiler, or you could design a 'modern and innovative' central heating system by using a geothermal heat pump. But if you ignore this "must" and leave out any device for heating water, you are not designing a 'modern and innovative' central heating system, you are designing a cold water circulation system!

Equally, you are free to ignore what this document says "must" be included in an IRMP framework. If you do, you will produce something, but it won't be a transparent plan that integrates risk management with business planning for an FRS/FRA that is answerable to its community. That is, it won't be an IRMP.

Chapter 1 – Scope



1.1 Background

Identifying the scope of an IRMP means identifying the factors that have a bearing upon the business of a fire and rescue service (FRS) locally, regionally and nationally. In terms of business management planning, it is a process of defining the business and its objectives.

It would be easy to say that the business of an FRS is the protection of life, property, community and the environment from fire and other risks. However, while undoubtedly true, this is too simplistic a description to be of value in the complex society of today.

- An FRS must deliver fire and rescue services to its local community, but it is also morally and legally obliged to deliver services across its geographical boundaries in the event of regional and national emergencies.
- Fire & Rescue Service legislation and National Frameworks place obligations on FRSs to undertake certain activities, and to undertake them in particular ways.
- FRSs have a role to play under the Civil Contingencies Act 2004 (CCA).
- They also fall under local government legislation that requires them to work in concert with other public sector bodies (as well as the voluntary sector and private industry) to deliver on a Sustainable Community Strategy for example.
- The business of an FRS is required to comply with best value policies and financial controls.
- FRSs fall under their own governments, and are therefore obliged to deliver on the wider social strategies of those governments.

Having said that, the delivery of emergency intervention warrants particular attention. Even though it is only one of many legal obligations that an FRS must fulfil, it must be described as "core business". For example, an FRS may be failing in its legal duty if it does not comply with the European Working Time Directive, but an FRS would be completely valueless if it failed to respond to reports of fire, road traffic collisions and other emergencies.

> The range of issues that have a direct or indirect impact on the integrated risk management planning process is so wide that it is unreasonable to expect one person, or even a small team, to identify all of them. They span operational issues, legal obligations, financial rules, health and safety imperatives, human resources; the list is almost endless. Scoping an IRMP would therefore best be delivered by 'brainstorming' key personnel, employee representatives and external stakeholders.

1.2 Aspects of the scope

The scope of the IRMP is assessed by taking the business objectives of the FRS and identifying the business processes that deliver those objectives. The following list shows some of the processes that might be identified:

- Local policies
- Regional policies
- National policies
- International interfaces (such as cross border working between England and Scotland and possibly involvement in EU or wider disaster relief efforts)
- Legislative enforcement
- Compliance with legislative obligations
  - Obligations to deliver certain services (e.g. CCA)
  - Corporate obligations to operate in a certain way (e.g. to consult)
  - Obligations towards employees (e.g. compliance with health and safety regulations)
- Corporate responsibilities
- Social responsibilities
- Response commitments[2]
- Stakeholder's expectations

While this may seem like a lot of work, it is important that all of these internal and external influences are considered at this early stage. Even if the impacts of some aspects are not immediately obvious, they should be noted as existing. Many of them will affect others further into the IRMP process and some of the apparently obscure influences will turn out to be significant.

1.3 Response commitments

When considering many of the aspects of scope, the FRS has little choice but to include them and follow them right through the IRMP process. This is not necessarily the case with response commitments. Certainly the level of response to many risks is not controlled by mandate.

Under Fire & Rescue Service legislation, FRSs have a legal responsibility to respond to fires and road traffic accidents. FRSs also have a responsibility to act in connection with an 'emergency' under the Civil Contingencies Act 2004. But in addition, FRSs have the option of taking action in response to other eventualities such as flooding[3], lift rescue, river rescue, offshore firefighting, animal rescue and, if the truth be told, almost any other humanitarian emergency that no one else is able to resolve. The fire and rescue service often describes itself as the "can do service".

However, simply responding to any humanitarian emergency without adequate forethought can put at risk the health and safety of personnel and the public, as well as the reputation of the service. It is therefore necessary to consider which of the facets of community risk the FRS will respond to.

Note that as a response commitment, "fire", for example, is much too general in its extent to be used as a single item that is in the scope of an IRMP. Fire comes in all shapes and sizes and in considering the scope of response to fire, the IRMP process should break it down into finer categories, or in some cases, specific risks (such as

[2]In this context, "response" does not necessarily mean "emergency response with fire appliances". Here, a "response commitment" is a risk that the FRS may commit itself to responding to in some way. This response may be through intervention with fire appliances, but it may also be through prevention activity or through some other avenue such as risk management via partnership working.

[3]At the time of writing, both the FBU and CFOA are petitioning government for the response to flooding to be made mandatory.

airports, oil terminals and community buildings). Some response commitments that may be considered include:

- Dwelling fires
    - Multi-occupied
    - Low rise
    - Medium rise
    - High rise
    - Underground
- Industrial fires
    - Manufacturing
    - Large retail premises
    - High rise office accommodation
    - Power generation
    - Chemical manufacture/distribution
    - Oil and fuel handling/storage
    - Communication hubs
- Historic buildings
- Education establishments
- Community buildings
- Environmental/pollution risks
- Wildfire incidents
- Hazardous material incidents
- Rescue from height
- Animal rescue
- Lifts
    - Rescue
    - Release
- Water
    - River rescue
    - Flood rescue/relief
- Wide-scale wind damage
- Extrication from machinery
- Road traffic collisions
    - Motorway
    - Non-motorway
- Rail incidents
- Shipping incidents
    - In harbour
    - At sea
    - River incidents
    - Ships under construction/dismantling
    - Naval vessels

- Aircraft incidents
  - At airport
  - Crash in populated area
  - Crash at remote site
  - Military aircraft
- Terrorist incidents
  - Conventional
  - Chemical
  - Biological
  - Nuclear/radiological
- Building collapse
- Arson as a special case (*See Chapter* 3)

Remember that scoping the IRMP is only the first stage of the process. At this stage, the FRS is not committing itself to any particular activity. The IRMP process is an iterative one whereby a facet of community risk may be considered to be in scope, but may be later disregarded when the level of risk is assessed at stage 2, or may be re-evaluated at stage 3 if an appropriate strategy cannot be identified.

What is important is that potential operational response commitments are actively recorded as being within the scope of the FRS. This means that later in the IRMP process, the risk posed to the community by the particular event will be assessed. Later still in the process, a strategy will be developed to deal with the risk, and appropriate resources will be allocated to that strategy.

Judgement is required at this stage to decide upon the level of detail entered into when considering specific response commitments. Note that in the list above, 'water' has been divided into *river rescue* and *flood rescue/relief*. It may be considered more appropriate to consider water-related commitments in terms of *still water, flowing water* and *tidal water*. Similarly, it may be appropriate to divide 'building collapse' into sub categories according to building type and/or the reason for the collapse.

The classification of response commitments should be decided at a local level in response to local circumstances in consultation with local FBU officials. In making this decision, it is advisable to consider the implications in terms of the rest of the IRMP cycle.

Each response commitment must be assessed in terms of the risk it presents to the public and a strategy must be described for dealing with it. Therefore, a highly detailed classification system that divides road traffic collisions into sub categories according to the make of car for example will generate an enormous workload. On the other hand, the FRS has a responsibility to have in place a strategy for dealing with every reasonably foreseeable incident. Therefore, a very coarse classification system that lumps together *river rescue*, *flood relief*, and *coastal incidents* as 'water rescue', will not allow the risks of these very different incidents to be assessed, and will hinder the development of specific delivery strategies that are safe to operate and appropriate to the circumstances.

1.4 Stakeholder's expectations and consultation

There are many stakeholders in an FRS. Each with different demands and expectations, and each with a different level of understanding of the workings and limitations of the organisation. When working on the scope of the IRMP, the FRS must seek the views of its stakeholders through consultation and must make every effort to incorporate those views into the process. The post IRMP FRS delivers services that are needed and wanted by the local community. To know what the local community needs and wants, the FRS must talk to them. Some of these stakeholders are considered below.

1.4.1 Public

It is worth considering for a moment, the role of the fire authority as public representatives. The fire authority is comprised of elected representatives of the public served by the FRS. If the FRA is made up of 'members of the public', the need for 'public' consultation in the IRMP process is not (other than that it is a legal requirement) immediately obvious. However using terms associated with a private sector business; as well as representing the customers of the FRS, members of the fire authority are *non executive directors* of the FRS. Given this potentially conflicting role, it is understandable that the public should be directly asked about their expectations, even though they elected the fire authority to represent them.

According to Fire and Resilience Guidance Note 2 published by the English government to give guidance on the consultation aspects of IRMP preparation (See Appendix 2):

> "*The Secretary of State considers, therefore, that fire authorities should consult widely as part of the process of preparing their* IRMPs *because this will help to ensure that* Plans *draw on the widest possible range of data and views and represent the best possible response to local needs and wishes. Effective consultation can act as a catalyst for greater community participation. If members of the public think they are being listened to they are more likely to make suggestions for improving services or ask for information. Where authorities maintain an ongoing dialogue with communities, local opinion about options for change can be canvassed at an early stage. Consultees presented with a fait accompli are more likely to react negatively to proposals for change*".

On the same subject, Scottish guidance (See Appendix 3) says:

> "*Effective consultation can act as a catalyst for greater community participation. If members of the public think they are being listened to they are more likely to make suggestions for improving services or ask for information. Where authorities maintain an ongoing dialogue with communities, local opinion about options for change can be canvassed at an early stage*".

> In relation to the scope of an IRMP, two phrases are key. "Local needs and wishes", and "maintain an ongoing dialogue with communities".

As stated above, the IRMP process is iterative. The public may state their wishes with respect to a particular risk at this preliminary stage, but the actual risk may be found to be low, or the time trouble and effort (including cost) needed to address that risk may be assessed as disproportionate. Any such findings will need to be taken back to the public, as part of an ongoing dialogue, to explain the reason why their wishes are not to be addressed. All national guidance documents make it clear that it is not enough to collect the results of a randomly distributed questionnaire, and then only to take note of responses that fit in with a pre-prepared plan.

1.4.2 Representative bodies

Consultation with employees falls broadly into two categories:

(1) Statutory consultation on employment and health and safety matters.

(2) Consultation on general work process and practices.

There is clearly some cross-over where health and safety impinges on work practices, but in general the former is controlled by legislation and regulation, while the latter is simply good practice for any organisation that wishes to motivate its workforce and improve its systems by listening to those who deliver them on a day-to-day basis.

The following paragraphs refer to consultation on work process and practices. Consultation on health and safety issues is touched on in Sections 3.3 and 4.1. A detailed discussion of statutory consultation on employment matters is outside the scope of this document.

All guidance says that FRSs are expected to have consulted employees (uniformed and non-uniformed) and their representatives.

Fire and rescue is a labour intensive, customer focused business. Operational firefighters on fire stations, fire control, and support staff are therefore the most valuable asset of an FRS as they are the interface between the

FRS, its customers and its partners in the delivery of services. When identifying service delivery matters that should fall within the scope of the IRMP, statistical examination of past performance can inform the process to a certain extent, but the experience of employees can fill in much vital detail.

By consulting uniformed employees through the Fire Brigade's Union, the FRS has access not only to the experience of its own 'front line employees', but through regional and national links, it has access to the combined experience of over 85% of uniformed members of UK fire and rescue services.

Direct communication with employees (rather than through their representative body) has a place. It can be quicker and easier for management to reach its staff, and it does give more members of staff the opportunity to question management about proposals if they wish to. However communication should not be confused with consultation.

Managers are selected and appointed because they are intelligent, articulate, and knowledgeable. Some frontline staff may not possess these qualities and attributes and therefore may not have the appropriate skills to express themselves effectively, and may not be aware of information available to support their views. Some members of staff may even feel intimidated by direct communication with management.

It is for these reasons that what managers hear during direct communication with staff is not necessarily what staff truly think or feel. And it is for this reason that staff elect people from within their own ranks who they feel are best suited to represent them in consultation with management.

1.4.3 Local strategic partners

In England it is a requirement that FRSs must enter local area agreements, and work with strategic partners to deliver a sustainable community strategy. Local strategic partners must therefore be included in the process of developing the scope of the IRMP. An equivalent process exists in other parts of the UK.

In the CLG publication *Fire and Rescue Service partnership working toolkit for Local Area Agreements*, emphasis is placed on the role of the FRS as one of contributing to sustainable community strategies through prevention activity (primarily the prevention of arson). Examples cited are:

- Prevention of arson (abandoned cars, rubbish fires, outdoor fires, fires in buildings) so as to improve local community environment
- Use of volunteers to conduct community fire safety work
- Prevention of 'anti-social' fire crimes, such as arson of abandoned cars
- FRA youth work with offenders
- Prevention of 'anti-social' fire crimes, such as arson of abandoned cars and FRA youth work
- FRA youth work with offenders or arsonist counselling
- FRA capability to respond to violent incidents, for example urban search and rescue capacity
- FRA consultation with community regarding FRS civil protection arrangements
- FRA youth work with offenders
- FRA Road Traffic Collision (RTC) prevention and response activities
- FRA RTC prevention and response activities
- FRA fire and RTC prevention and response activities
- FRA conduct of home fire safety checks and prevention of 'anti-social' fire crimes, such as arson of abandoned cars and FRS youth work
- FRA conduct of home fire safety checks targeted at people over 65.
- FRA conduct of home fire safety checks that cater for special needs, for example alarms for deaf persons, domestic sprinklers for bed-ridden persons, etc.
- Prevention of arson (abandoned cars, rubbish fires, outdoor fires, fires in buildings) to improve local community environment including car clearances

While the above comes from an English publication, the principles are valid anywhere in the UK. Any of the activities may be identified by strategic partners as being within the scope of the IRMP.

However, building a cohesive community involves more than just prevention activity. Preventing arson attacks on unoccupied buildings can contribute to preventing the downward spiral of a community, but if arsonists do attack despite prevention efforts, adequate intervention services will result in less damage. Minor fire damage is less destructive to a community than complete burnt out buildings.

An FRS may treat the response to fire at a community centre as being no different from any other property fire when in fact; the loss of a community centre could be a devastating blow to the regeneration of a local area. If strategic partners warn that this could be the case, the FRS could contribute by preparing an operational plan for this key community building, just as they would for a high-risk site such as a chemical processing facility.

1.4.4 Heritage and environmental risks

The English Fire and Resilience Guidance Note 1 says that a modern FRS should achieve its objectives through a;

> "*risk-based approach that can deliver improvements in community safety based on locally identified needs*".

This is a reasonable approach, except that an FRS is sometimes obliged to take a wider view than its own local community and their immediate needs. Two good examples of this are the management of fire risk in our heritage, and in the approach to environmental pollution risks.

Historic buildings, artefacts in museums, sites of special scientific interest and the like are not the property of the FRS, the fire authority, or even the community who happen to live adjacent to them for the time being.

Those of us who are alive today are simply custodians of history, with a responsibility to hand it on to future generations. As such, the measures to be taken for the prevention of fire and intervention in case of fire, are not wholly at the discretion of the local FRS and the authors of its IRMP.

In considering how the protection of art, history and the natural environment should fit within the scope of an IRMP, it is incumbent upon the FRS to consult with bodies such as English Heritage, Historic Scotland, and the National Trust.

Because of the emphasis on local needs, and the 'hands off' approach of government towards the running of FRSs, it is not mandatory to follow national guidance on the incorporation of heritage risk into an IRMP. However, since historic buildings belong to the Nation, not the local community, it is only right that a national approach should be followed in its entirety.

In the case of environmental pollution risks, it is entirely possible that larger incidents could have effects well beyond the boundaries of the FRS and the community it serves. Locally, an environmental incident could have effects that last long after the current members of the fire authority have left office.

Therefore, as with the management of heritage risk, the measures to be taken for the prevention of environmental pollution and intervention in case of environmental pollution, are not wholly at the discretion of the local FRS and the authors of its IRMP.

In this case, the scope of the IRMP should be discussed with bodies such as the National Rivers Authority and the Environment Agency.

1.4.5 Cross border, regional and national demands

Much emphasis has been placed on the idea that IRMPs are intended to address local issues. However FRSs do not exist in a vacuum. For example, just because an international airport lies within the boundaries of one FRS, it would be unreasonable to expect the local FRS to provide all of the resources needed to deal with a major aircraft incident. Therefore, in preparing their IRMPs, neighbouring FRSs must put the international airport within scope and all must work together to develop a co-ordinated response.

The same is true of flooding, fires at oil and chemical sites, terrorist incidents and so on.

At a smaller scale, commonplace cross border working must be included within scope so that a uniform co-ordinated response is delivered.

1.5 Legislation

When considering the production of an IRMP, the extent to which legislation applies to an FRS must be taken into account. Legislation can be divided into three broad categories:

1. Legislation that is enforced by the FRS (or by others in association with the FRS).
2. Legislation that imposes duties upon the FRS to deliver a service.
3. Legislation that imposes controls upon the way in which the FRS acts.

It should be noted that there are no distinct boundaries between the three categories described above. However, it is of value to think of legislation in this way so that it can be integrated into the IRMP planning cycle. For example, legislation that imposes both duties and controls may need to be integrated in a complex way, but none-the-less, if that legislation is separated into its constituent parts (duties and controls), then a complex integration can actually be achieved in a series of simple steps.

Some examples are described below.

1.5.1 Legislative enforcement

Examples of this type of legislation include new fire safety legislation[4]. This is enforced directly by the FRS. The FRS is also involved in the enforcement of the Building Regulations in association with building control authorities and approved inspectors.

All such legislation should be identified during the scoping stage of the IRMP process so that strategies can be developed for delivery.

1.5.2 Legislative duties

In England and Wales, The Crime and Disorder Act 1998 places a duty on the fire and rescue authority and other partners to co-operate in the development and implementation of strategies for tackling crime and disorder in their area.

The duties of an FRS under the Civil Contingencies Act 2004 (CCA) include response in the event of terrorism and other threats to human health or welfare and to assist in the protection of the environment of the United Kingdom, including in times of coastal and maritime emergencies.

1.5.3 Controlling legislation

The type of legislative control considered here includes the Health and Safety at Work Act 1974 that requires FRSs to provide safe systems of work. Equality and diversity legislation requires FRSs to treat people in certain ways.

It is true that the Health and Safety at Work Act and equality and fairness legislation place duties on FRSs, but in the context of IRMP, they are 'internal' duties. They are not duties to deliver a service in the same way as new fire safety legislation or the CCA. Instead they are duties to behave in a defined way when services are being delivered.

[4]The Regulatory Reform (Fire Safety) Order 2005, The Fire Safety (Scotland) Regulations 2006 and the Fire and Rescue Services (Northern Ireland) Order 2006.

1.5.4 Integration into the rest of the IRMP cycle

Figure 3 is intended to show that all legislation that relates to an FRS must be considered when drawing up the scope of an IRMP. However enforced legislation and legislation that imposes duties must be treated the same as any core business stream – like any response commitment or stakeholder expectation. Whereas legislation that imposes controls on the FRS must be *applied* to the core business.

As stated above, there are no distinct boundaries in the function of legislation, but broadly speaking it can be said that an FRS does not need to risk assess, deliver and monitor controlling legislation. Rather, it must develop strategies and delivery mechanisms for core business streams *that take controlling legislation fully into account*. When monitoring the effectiveness of delivery, the FRS must *compare its performance against the requirements of the controlling legislation* as well as against the performance standards for that core business stream.

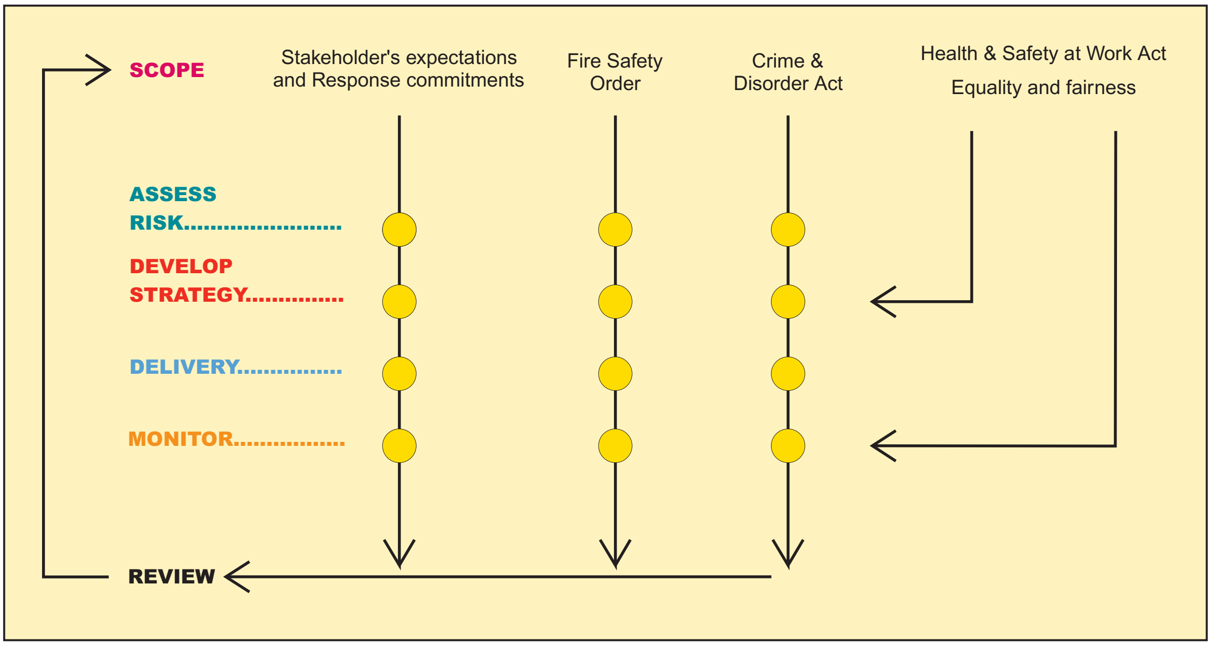
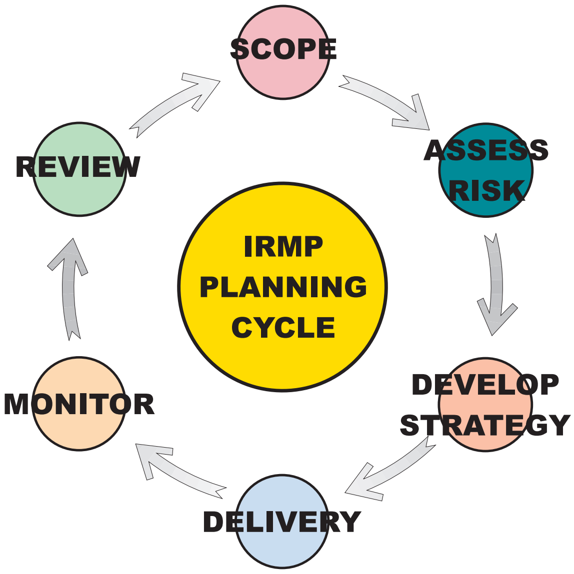


Figure 3. Integration of legislation into IRMP planning cycle

Chapter 2 – Assess Risk



2.1 Background

2.1.1 Risk assessment as a business process

The purpose of any risk assessment is to consider the likelihood and the impact of an unwanted event. The object being to enable proportionate measures to be taken to eliminate/reduce the likelihood of occurrence or reduce/manage the impact of the event.

The fact that 'risk assessment' is a stage in the IRMP planning cycle can lead to confusion. Risk assessment is a term normally encountered in the management of health and safety or fire safety. It is therefore not uncommon for people to think that the IRMP planning cycle is akin to the safety management process described in the HSE's document HSG65 Successful Health and Safety Management. However IRMP is not an HSG65 management process. As stated in the Introduction to this document, IRMP is a whole business planning process.

The reason that risk assessment is a stage in the IRMP process is that the business that an FRS must plan to deliver is the business of safety management for a community. In order to plan for the delivery of that business, the FRS must assess the level of risk.

HSG65 falls under the heading of controlling legislation that the FRS must integrate into its own internal process to ensure safe systems of work. HSG65 is inward looking, IRMP is outward looking.

2.1.2 Consultation

In section 1.4, it was highlighted that stakeholder's expectations needed to be taken into account when considering the range of risks that needed to be put into the scope of the IRMP. This process is one of broad consultation.

In this chapter, issues of risk assessment are considered. This involves first understanding the fundamental concepts (and conflicts) of wide scale community risk management. Followed by a process of considering the risks that have been identified as being in scope, assessing their magnitude, and developing challenging but realistically achievable targets for risk reduction that reflect the philosophy of community risk and stakeholder expectations as identified through consultation.

2.2 Response commitments

2.2.1 Likelihood of occurrence

Working out the likelihood of a particular fire or event occurring can be divided into two steps. The first step is collecting data to show the number of times the event has occurred in the past. The second step is to use mathematical techniques and subjective judgement to predict future occurrences.

Using mathematical techniques to predict future occurrences relies on statistically significant quantities of historic data. The number of RTCs in an area may be quite large, but it would not be adequate to base predictions on, say, two years data. Scottish IRMP guidance (amongst other publications) recommends that any statement about "trends" should be based on at least five years data (See Figure 4). In the same way, the number of fire deaths in a year is often in the low single figures in many FRSs. This means that even if five years of historic data is used, one single event can create what appears to be a trend (See Figure 5).

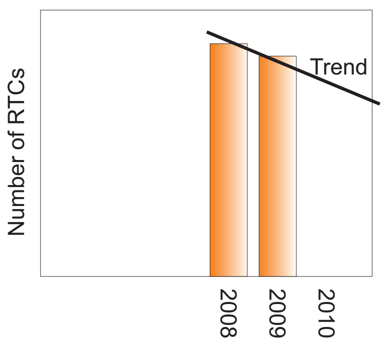


Figure 4a

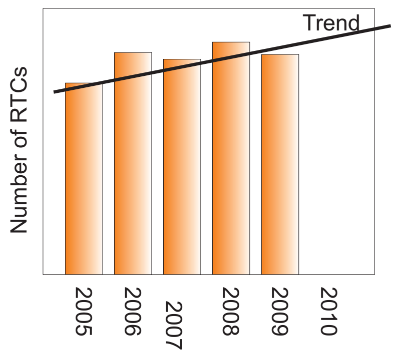


Figure 4b

In Figure 4a, it looks as if the number of RTCs will fall in 2010. But this is only based on two previous year's data. In Figure 4b, three more previous year's data are added and it can be seen that 2009 was actually just a relatively good year within an increasing trend.

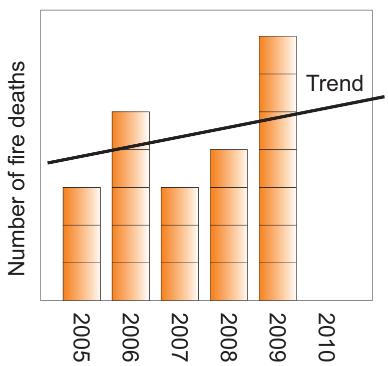


Figure 5a

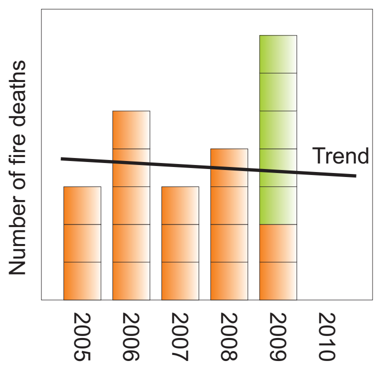


Figure 5b

The fire death data shown in Figure 5a make it appear as though there is an upward trend. However only small numbers are being used and in fact, five of the deaths during 2009 occurred in a single (unusual) fire event. This is shown in Figure 5b where a more realistic trend can be seen as downwards.

When considering statistical data, the English government publication *Fire and Rescue Service partnership working toolkit for Local Area Agreements* gives some useful basic guidance on techniques that may be used. However, it is important to point out that even the smallest FRS is a multi-million pound organisation using public money to deliver prevention, protection and rescue services to an entire community at great risk to its employees. The analysis of statistical data for the preparation of a business plan for such an organisation should not be carried out by anyone who needs basic guidance from government publications to understand mathematical techniques. If the

FRS does not employ someone 'in-house' who is competent to analyse statistical data, the work should be contracted out to a specialist.

For anyone with sufficient mathematical skills, assessing the risks associated with the response commitments identified in the scope is a relatively simple process, although collating the detail required to undertake the process might be challenging.

Assessing the likelihood of occurrence of a particular infrequent event, such as a fire in a heritage building or a flood, can be undertaken by examining long term historic data, by examining national data, and by consulting experts in the field.

See Section A.1.1 of Appendix 1 of this document.

An example of the value of consultation with others is in the assessment of community related risk factors such as age range, ethnic origins and socio-economic ratings. These factors are not set in stone, and there may be long term trends of change, or short term plans to manufacture change. To ensure that the IRMP is not out of date shortly after it is prepared, the FRS should established lines of communication with local authority partners (for example planning departments, housing departments and social service departments) to ensure that any likely or proposed change in demographic risk is taken into account.

One note to consider in relation to the use of socio-economic data in IRMPs is that it is only of any value if it is subsequently used to describe costed strategies for reducing risk. A common theme in many IRMPs has been that socio-economic data is presented in colourful maps, but then not used in any constructive way. An IRMP is a risk management planning document, not a reference text for students of human geography. Socio-economic data must be analyzed, risks quantified, risk reduction targets must be set, and delivery strategies must be developed and consulted upon.

2.2.2 Impact of the event

In 1997 the document *Safe as Houses The Report of the Community Fire Safety Task Force* was published. This marked the beginning of an emphasis for all UK FRSs on domestic fire safety and the reduction of fire death and injury.

That report set the FRS four targets to be achieved over the following five years. All of the targets were focussed on domestic fires.

This emphasis was reinforced by Bain who said in his report *The Future of the Fire Service: reducing risk, saving lives The Independent Review of the Fire Service December* 2002:

> *"A new approach is required to plan the use of Fire Service resources to reduce loss of life in fires and accidents, and provide better value for money. The way to achieve this is by focusing Fire Service planning and activities more on saving lives, rather than on providing specified types of cover for particular types of incident".*

Paragraph 3.3.1 of the English Fire and Resilience Guidance Note 1 says:

> *"While risk to property, the environment and heritage will continue to be of importance, risk to life will in future be given the highest priority".*

Integrated Risk Management, Fire Authority Development Framework for Emergency Response and Community Safety in Scotland says:

> *"An IRM plan will be the blueprint by means of which fire authorities will make the transition from a property protection fire cover model to a fully integrated model based on life safety".*

Fire and Rescue Authority Risk Reduction Plan, Wales a Safer Country says:

> *"Initial Service Standards focus on life risk and will be developed to ensure citizens, communities and businesses understand them. The thrust of RRP in Wales is for FRAs to allocate resources appropriately to risk".*

For England, the Fire and Rescue Service National Framework 2008–11 says:

> *"The primary focus of Government policy on prevention measures remains life safety".*

For these reasons and many more, when assessing the impact of events, there is a tendency for FRSs to concentrate on death and injury.

It is quite right that IRMPs should be based on the impact of events in terms of death and injury, but it must not be the only impact that is taken into account.

Even Bain said:

> *The objectives of a modern Fire Service can be summarised as:*
>
> - *to reduce loss of life, loss and injury and property damage from fires and other emergencies;*
> - *to reduce the number of fires breaking out;*
> - *to minimise the impact on the environment of fires and other emergencies, and the techniques used to fight them;*
> - *to secure safe systems of work at all times;*
> - *to improve community safety by providing assistance at non-fire emergencies;*

The English Fire and Resilience Guidance Note 1 also says:

> *The Government thinks that a modern and effective fire and rescue service should serve all sections of our society fairly and equitably by:*
>
> (a) *reducing the number of fires and other emergency incidents occurring;*
>
> (b) *reducing loss of life in fires and accidents;*
>
> (c) *reducing the number and severity of injuries in fires and other emergency incidents;*
>
> (d) *reducing the commercial, economic and social impact of fires and other emergency incidents;*
>
> (e) *safeguarding the environment and heritage (both built and natural), and*
>
> (f) *providing value for money.*

Therefore, when assessing the impact of an emergency event, the following factors should all be considered:

- Life loss
- Injury
- Property damage
  - Building fabric
  - Building contents
- Heritage loss (both built and natural)
- Business interruption
  - Direct impact on premise
  - Indirect impact (e.g. effect of fire on nearby transport infrastructure)
- Environmental damage
- Social impact
- Economic impact
- Effect on community cohesion and sustainability

It should be taken into account that of all the factors listed above, only life loss; injury and property damage are taken into account by fire and rescue computer risk models. Using these numerical models to assess the impact of fire might predict that the loss of a community centre on a poor quality housing estate is insignificant. However an intelligent assessment of the wider social impact on community cohesion and sustainability might show a fire in a community centre to have such an impact that specific mechanisms are required to prevent fire and to respond to fire if it does occur.

- The effect of fire is not restricted to injury and death.
- The cost of fire cannot be fully converted into pounds and pence.
- All aspects of the impact of fire must be fed into the IRMP risk assessment.

2.2.3 Combining likelihood and impact

A simplistic view of the risk assessment process would now lead to the combination of the likelihood and the impact of events. This would allow all events to be ranked in order of severity and would ensure that only actions that are proportionate to the event would be implemented.

However, when dealing with risk on the scale at which an FRS works, this type of pseudo-numerical approach is not valid. An FRS is providing a service to a community, and the quality of service that the community wants is not necessarily based on a computer generated numerical calculation of risk.

The English Fire and Resilience Guidance Note 2 says:

> *"Some people might be prepared to accept a substantive case for reducing fire cover locally in order that resources might be re-deployed elsewhere. Others may regard any reduction in cover, even if the current use of the resource is limited, as a challenge to local safety that must be resisted as a matter of principle."*

Scottish guidance says:

> *"Fire authorities should consult widely as part of the process of preparing their* IRM *plan because this will help to ensure the plan draws on the widest possible range of data and views and represent the best possible response to local needs and wishes"*.

The question is, how should an FRS incorporate "matters of principle" into their IRMPs? What happens when the public's "wishes" differ from their "needs"?

In paragraph 1.5 of English Fire and Resilience Guidance Note 1, it says:

> *"In order to provide a fair and equitable service it will be necessary for fire and rescue authorities to take into account in their* IRMPs *the diverse needs of the population they serve and to assess how best to meet these needs, particularly in relation to community safety provisions"*.

This is the process that a car manufacturer might call 'market research'. Finding out the type and quality of cars that the public wants them to make.

Unfortunately, while market research may be difficult for car manufacturers, it is doubly so for the fire and rescue service. The difficulty arises from several sources:

1. The concept of a service being delivered through a balance of prevention, protection and intervention is a difficult one for people outside the fire and rescue industry to comprehend. This means that unless a significant amount of education precedes the market research, then its results are not likely to be founded on robust risk management principles.

2. A subset of 1 above, is the question of perceived risk versus actual risk. Particularly when considering the behaviour of large populations, it is common for people to be more fearful of certain dangers than others, even though the risk of occurrence of the more feared danger may be much lower than the less feared danger. An example of this is that many people will happily drive to an airport (even though 3,000 people are killed on UK roads every year), but they have a fear of flying (even though annually, only 900 to 1,000 people are killed *world wide* in air accidents).

   The question is, should the magnitude of the impact of an event be measured as the size of the "real dangers" that can be numerically demonstrated to exist? Or should it be based on the "irrational fears" of the public at large?

Both approaches can easily be argued with equal weight. But it is worthy of note that in the past, Governments have not always gone for the statistically justified solution when faced with similar dilemmas. Following the Paddington rail crash in October 1999 where 31 people were killed and the Hatfield rail crash in October 2000 where 4 people were killed, The government pledged £60bn investment over the next 10 years and Railtrack was eventually taken back into public ownership. Between October 1999 and October 2000, 3,000 people were killed on UK roads. No proportionate investment in road safety was ever made.

3. Another consequence of 1 above, is that in developing a service delivery standard, the writer of an IRMP may well use professional risk management tools. Using these tools, 'overall risk' is measured as a function of the likelihood of an event and the impact of an event.

Risk x Harm = Overall Risk

As such (using arbitrary numbers) it may be proposed that:

- If the level of fire prevention delivery by the FRS means that the risk of fire is 0.1, while the level of intervention delivery means that the potential for harm if a fire does break out is 0.2, then the overall risk is 0.02.

  0.1 x 0.2 = 0.02

- However, If the level of *fire prevention delivery is improved* so that the risk of fire is reduced to 0.05, but the level of *intervention delivery* is reduced so that the potential for harm by fire is increased to 0.3, then the overall risk is 0.015.

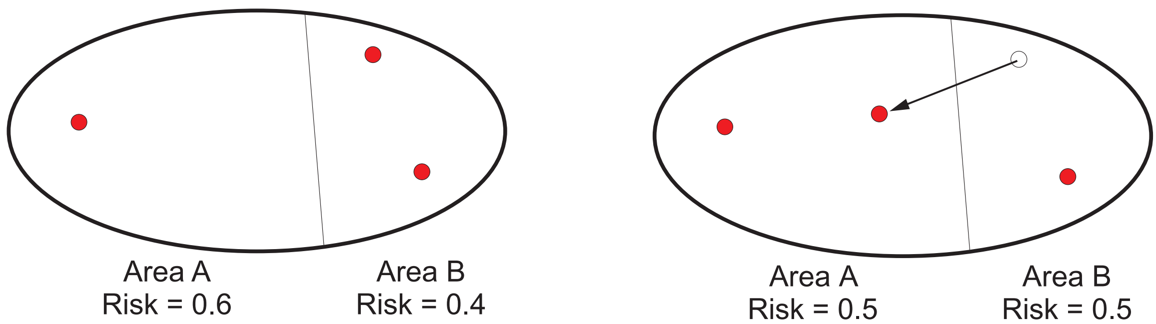
  0.05 x 0.3 = 0.015

In this example, the overall risk has been reduced by 25%. While this may be a good result from the perspective of the professional risk management tools, it is likely that members of the public outside the fire and rescue industry will not understand the intricacies of the argument. All they will understand is that the proposed change in service delivery will increased their potential for harm by fire (by 50% from 0.2 to 0.3).

Here the question is, should the fire and rescue service go ahead with the change because multiplying risk by harm statistically justifies it? Or should it not go ahead with a change because it makes the public feel less safe?

4. 3 above touches on the dilemma of 'average risk' versus 'individual risk'. Fire Authorities provide services over large geographical areas. Again using arbitrary numbers to illustrate the point:

- If half the geographical area (area A) is exposed to a risk level of 0.6, while the other half (area B) is exposed to a risk level of 0.4, then the average risk to the whole community is 0.5.
- The average risk to the whole community could be maintained at 0.5 by moving a fire station and reducing the risk in area A by 0.1, but increasing the risk in area B by 0.1. (Such a decision might be desirable to achieve a reduction in expenditure)



Is this approach acceptable? The terminology used in most government guidance makes frequent reference to "community" (the population of area A plus the population of area B?). This seems to be taken to imply that this approach of averaging out risk across a whole community is acceptable. The "community" as a whole is not affected by the proposal. However, this would clearly be of little comfort to the population of area B.

It is also significant that the lower risk in Area B is probably a historic consequence of national standards of fire cover. Therefore, the population of Area B is probably much higher than the population of Area A. This "averaging out" of risk therefore actually only reduces risk for a small number of people, but increases risk for a much larger number.

This challenge is clearly recognised by the Welsh guidance to RRPs which states:

> *"When presenting the evidence in the* RRP, *Authorities must ensure they explain the benefits and assess the implications upon individuals and communities".*

5. Paying for the fire and rescue service is also a key factor. Returning to the example of market research carried out by motor manufacturers, key players in that research would clearly be those who are potential purchasers of new cars. It is simple to ask the question, "if the proposed car had a sunroof as standard, it would cost an extra £500, would you be prepared to pay that?".

   However, in the case of a fire and rescue service, everyone pays whether they use the service or not. In fact, in gross terms, it is clear that those who use the fire and rescue service most, actually contribute least towards it.

   Therefore, when talking about the level of service to be provided and relating this to additional cost, or cost savings, should the fire authority give greater weight to the views of the 'at risk groups' of society who need the service more but who pay little for it? Or should it give greater weight to the views of the 'middle class majority' who need the service less but who pay most?

6. Then there is the question of life risk versus other risks. Paragraph 3.3.1 of English Guidance Note 1 says that:

   > *"While risk to property, the environment and heritage will continue to be of importance, risk to life will in future be given the highest priority".*

   Exactly where does that leave risk to property, the environment and heritage?

   Can it be ignored completely? Is it acceptable to provide resources to address the "risk to life", and just to allow those resources to be used for "risk to property, the environment and heritage" if and when necessary and to hope that they are adequate? Should additional resources be directed specifically at the "risk to property, the environment and heritage"? If so, how much? Under the heading of consultation, whose opinion should be taken into account?

7. The final source of confusion covered here about the application of 'market research', is also to do with weighting. 6 above, considered the weighting given to different aspects of societal risk, but consideration must also be given to the weighting of "value for money".

   All government guidance states that value for money is a function of a fire authority, but how far can that concept be pushed? Take the example of the proposal described in 4 above. The average risk to the whole community is maintained constant by reducing the risk to some, while increasing the risk to others. Regardless of the question of whether or not it is acceptable to increase the risk to part of the community, is this proposal acceptable if it means reducing the overall cost of the service?

   To go one step further, would it be acceptable to increase the risk to a whole community if it meant one additional fire death per year, but a saving of £2M per year? Given that the value of preventing a statistical fatality (VPF) is about £1.2M, such an increase in risk does represent "value for money".

In fact, the VPF of £1.2M is based on a value of a life-year (VOLY) of £30,000 per year multiplied by an average remaining life expectancy of 40 years (people live for 80 years so the 'average' person has 40 years left). A true statistician could therefore argue that if the increase in risk to a whole community meant one additional fire death per 10 years of a person aged over 60, value for money would be achieved with a saving of only £60k per year.

Quite clearly, the true meaning of value for money needs to be understood. There is a direct conflict between the statistical meaning of value for money (which justifies an increase in risk) and the objective of reducing risk to all.

Some describe 'efficiency' as being "getting more for less". However 'efficiency' actually has a strict physical meaning that is equally relevant to its financial meaning. Efficiency is the ratio of output to input:

$$\text{efficiency} = \frac{\text{output}}{\text{input}}$$

So it is true that getting more for less (increasing output and reducing input) represents an improvement in efficiency:

$$\text{efficiency} = \frac{6}{12} = 50\% \quad => \quad \text{efficiency} = \frac{8}{10} = 80\%$$

But efficiency can also be improved by increasing input if the output increases by a greater proportion:

$$\text{efficiency} = \frac{6}{12} = 50\% \quad => \quad \text{efficiency} = \frac{10}{15} = 66\%$$

And efficiency can even be improved by reducing output if the input reduces by a greater proportion:

$$\text{efficiency} = \frac{6}{12} = 50\% \quad => \quad \text{efficiency} = \frac{4}{6} = 66\%$$

When "efficiency savings" are being proposed for inclusion in IRMPs, it is important to consider which of the scenarios above are delivering those savings. Delivering less for considerably less may be an "efficiency saving" in the strictest definition of the term, but it is contrary to all guidance on the function of an IRMP.

The challenge faced by stakeholders in the fire and rescue industry is that conflict and confusion is inevitable as long as there is no clear guidance on the basic principles of how an IRMP is supposed to set standards of service. One person is free to interpret the objectives of IRMP as being to provide value for money even if this means reducing the risk to some while increasing the risk to others, and ignoring the views of the public on the grounds that they don't understand the complexity of risk management. On the other hand, another person is equally justified in interpreting the objectives of IRMP as being to deliver what the public (customers) want (even if what they want is not necessarily what is best for them), and that the risk to every individual should be maintained or reduced (as long as public money is not actually wasted).

In exploring the seven points above, a great deal of space in this document has been devoted to theoretical examples illustrating the nature of true risk, the public perception of risk, the management of risk and value for money. However it is critical that those who prepare IRMPs, and members of fire authorities who are responsible for them, can fully appreciate the philosophical implications of whatever approach they take on these issues. They may be called upon to publicly justify their decisions at some point in the future.

The Scottish guidance to IRMP preparation has a section entitled Philosophy of risk and risk management. It says:

> *"The perception of risk varies between individuals and between groups and is based on attitudes, personalities and experience. Community perceptions influence community expectations.*
>
> *The risk types relative to emergency response and community safety can be listed as:*
>
> - *Individual life risk*
> - *Societal life risk*
> - *Property damage*
> - *Environmental damage*
> - *Heritage protection"*

Unfortunately no further exploration of these issues is presented.

In the Welsh guidance, a little more clarity is offered that makes risk management decisions a little simpler:

> *"Although the* FRA *need to place a greater emphasis on preventing fires from occurring in the first place, the need for an effective response to an anticipated or actual incidents that do occur must not be diminished"*.

In Wales at least, "Diminishing" response capabilities is unacceptable, even though greater emphasis must be placed on prevention.

Albert Einstein said:

> *"Everything that can be counted does not necessarily count; everything that counts cannot necessarily be counted."*

Public perception of risk is difficult to count, but it definitely counts.

Two fundamental principles should be applied when combining the likelihood and impact of events and assessing the gross effect:

Firstly, in preparing an IRMP, an FRS should take the lead from the police service who measure "the fear of crime" as a real thing. Even when the actual crime rate is not particularly high, steps are often taken if the *fear of crime* is high. An example of this is even described in the English government publication *Fire and Rescue Service partnership working toolkit for Local Area Agreements* where it is stated that:

> *"surveys of local 'fear of crime' and community issues help identify priorities that are not revealed by incident data"*

To answer the question posed at the start of this section "how should an FRS incorporate "*matters of principle*" and "*wishes*" into their IRMPs?" we should look at how the police recognises the "fear of crime" as a real issue. FRSs should accept that the "fear of fire" is as real as fire itself, and that recognising this fact helps identify priorities that are not revealed by incident data.

Secondly, value for money cannot take priority over the existing level of individual risk. That is, it can never be acceptable to increase individual risk (even by a negligible amount) simply because it can be justified by a cost benefit analysis. A fire safety inspector would reject such a proposal if it were to be made by a fire safety manager in a workplace, and the same type of proposal cannot be acceptable at the scale of an FRS.

'Value for money' should only be used as a tool to select the most cost-effective way of *reducing* individual risk.

2.2.4 Cutting costs

The reality in many areas of public service is that budgets are being squeezed and real terms cuts are not unusual. Public finance is a matter for the whole of society to debate, and it is well outside the scope of IRMP framework guidance. The function of the IRMP process is simply to be honest and transparent about the service proposed.

The consultation stage of the IRMP process has to highlight the difference between;

(a) true efficiency savings, and

(b) cuts in services that are forced on the FRS as a result of budgetary constraints.

Simply dressing up every change as "modernisation" or "improvement" introduces confusion into consultation with employee representatives, and it stifles the wider public finance debate described above.

None of the national guidance documents say that IRMPs should be smoke screens for political dogma or financial constraints. If providing value for money means providing a lower level of service because less money is available, IRMP consultation has to say so. It is the only way that the public can be sufficiently informed to make choices about the services they receive and what they are prepared to pay for them.

2.3 Other aspects of the scope

In Chapter 1, aspects of the scope of an IRMP were described as including such things as regional policies, legislative obligations and social responsibilities. Compared to response commitments, it is less clear how these aspects can be risk assessed.

However, all aspects of the scope must be considered in the broad framework of risk assessment so that the response to them is proportionate.

It may be helpful to consider that in a simple risk assessment, it is the occurrence of an 'unwanted event' that is being assessed. Therefore, in risk assessing an aspect of scope like 'regional policies', what needs to be considered are the risks and hazards associated with *failing to deliver regional policies*. Such an assessment would clearly require contributions from regional and national partners and other key stakeholders including the FBU. This process will lead to discussions that will identify the position of 'regional policies' in relation to other aspects of scope, and will enable a commitment of resources to be made to regional policies that is proportionate to their importance.

2.4 Setting performance standards

Determining the scope of the IRMP and the assessment of the risk posed by matters that are in scope are the first two stages of the 6 stage Integrated Risk Management Planning Cycle mapped out by the English IRMP Steering Group in 2005.

According to that 6 stage process, the stage following 'scope' is to develop proportionate strategies to address the risks that have been identified. However, it is also necessary that a performance management system must be integrated into the IRMP process in order to measure success or failure. This means that at the risk assessment stage, not only must the actual overall risk be identified, but also a performance target must be set for the *degree of risk reduction*.

In setting a performance target, it must be recognised that it is very unlikely that a strategy will be able to reduce a risk to zero. Performance targets should be challenging, but they should not be unachievable. For example, 'zero fire deaths' is an ideal aspirational vision for the future, but as a performance target for an IRMP strategy it is counter-productive. The purpose of a performance target is to measure whether or not a strategy is working. If monitoring reveals that the performance target is not being met, then clearly the strategy is not working, and the strategy must be changed. A performance target of zero fire deaths will probably not be met[5], so if the monitoring and review cycle is followed properly, a target of zero fire deaths will mean that the 'reducing fire deaths strategy' will have to change with every new IRMP – even if it is making reasonable inroads into the frequency of fire death.

Of course, the monitoring and review cycle could be ignored so that the existing strategy might continue from one planning cycle to the next even though the 'zero fire deaths' target has not been achieved. But this policy cannot be justified. What happens if fire deaths go against the national trend and *increase* by 50%? Is the monitoring and review cycle still to be ignored? Is the existing strategy that led to a catastrophic level of failure to continue? Or are there unwritten 'degrees of failure' where 'serious failure' will instigate a change in strategy, but 'acceptable failure' will not? If this is the policy, then 'zero fire deaths' is not really the performance target anyway, *the degree of failure that will instigate a change in strategy is actually the performance target*. *The only problem is that this real performance target is not transparently published in the public domain via the* IRMP.

2.4.1 Inputs, outputs and outcomes

The current trend in audit of public services is the measurement of out<u>comes</u> rather than the measurement of outputs. The concept is that outputs measure what the service does, whereas out<u>comes</u> measure what the service achieves by doing what it does. The measurement of outputs replaced the measurement of inputs several years ago with the introduction of OMPiS (Output Measures Performance Indicators).

However, practically speaking, <u>in</u>puts, <u>outputs</u> and out<u>comes</u> all have to be measured in order to monitor the performance of an FRS.

The reason for this is best illustrated by considering two examples of risks that will be in the scope of all FRSs.

The risk of death in fire will be identified as being something that needs to be reduced. Whether or not this is achieved will ultimately be measured through the changing number of fire deaths over time. That is, by measurement of the out<u>come</u> of the activities of the FRS. But (fortunately) the number of fire deaths in a geographical area the size of a typical FRS is relatively small, so if the FRS only measures its performance through out<u>comes</u>, the effectiveness, or otherwise, of strategies will not be apparent for several years. In terms of fire deaths, it is common for comparisons only to be considered meaningful if they can be measured over a 5 year period.

It would be unacceptable to put in place a strategy, and then not be able to measure its effect for 5 years. Especially a strategy that was directed at something so important as life safety.

The solution to this problem is to identify the out<u>puts</u> that should ultimately lead to the desired out<u>comes</u>, and to measure the out<u>puts</u> on a regular basis.

For example, ENTEC Reports 1996 & 1998: N*ational Risk Assessment of Dwellings*' & 'R*esponse Time Fatality Relationships for* D*welling* F*ires* indicated that the probability of fire death was linked to attendance time of fire appliances. If appliances could attend in less than 5 minutes, the probability of death was 3.8 per hundred fires. If appliances took 6 to 10 minutes to attend a fire, the probability of death was 4.2 per hundred fires.

Thus, if it is intended to achieve the out<u>come</u> of reducing the individual risk of fire death by adopting a strategy of keeping the attendance times of appliances to less than 5 minutes, an FRS would have to attend 250 potentially fatal fires before there was even a statistical possibility of saving an additional whole life.

The success of this strategy would take a long time to assess at the level of one FRS if it was only measured by the out<u>come</u> of number of fire deaths. However, every incident has an out<u>put</u> of an attendance time, so if the out<u>put</u> of attendance time is monitored, and maintained at less than five minutes, the FRS can be statistically assured that it is on target for achieving its desired out<u>come</u>.

NOTE: The ENTEC research quoted above is frequently sited as justification for the incorrect statement that *attendance times do not matter because most people are already dead before the* FRS *is even called*. The research is described by the graph shown in Figure 6.

[5]Certainly not in one IRMP planning cycle from the current starting position of approximately 400 fire deaths per year nationally.

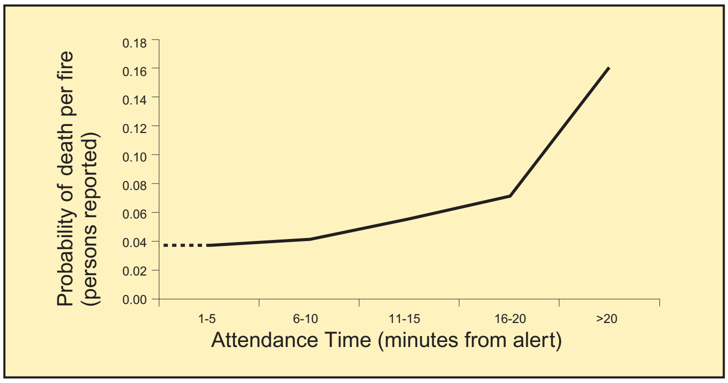


Figure 6. ENTEC Reports relationships for fire death linked to attendance time of fire appliances
ABOVE 5 MINUTES ANY INCREASE
IN ATTENDANCE TIME MEANS AN INCREASE IN
THE PROBABILITY OF FIRE DEATH

The dotted line in Figure 6 is added by this document to illustrate the correct interpretation of the data. The dotted line projects the data back to the y axis of the graph to show the probability of fire death if FRS attendance time was reduced to zero. The dotted line is horizontal.

The data states that for the average 1 to 5 minute attendance time, the probability of fire death is just under 0.04. The dotted line predicts that *this could not be improved upon by* FRS *intervention even if attendance times could be reduced to zero*.

However, from the average 1 to 5 minute attendance time upwards, the probability of fire death increases exponentially. Therefore, the correct interpretation of this data is that *reducing attendance times from 1-5 minutes down to zero would not save any additional lives, but increasing attendance times above 1-5 minutes will increase the probability of fire death*.

A second example to be considered here is the response of an FRS to the risk of wide scale flooding. The outcome of a response to wide scale flooding might be measured in terms of lives lost, property damaged, level of business interruption, maintenance of essential services and so on. This might be achieved by the output of emergency response with specialist equipment and adequately trained crews and fire control staff working in concert with partners such as the police and the armed forces.

However, unless wide scale flooding actually occurs, neither the outcomes nor the outputs can be measured other than through simulation and exercise. For this type of risk event, the performance of the FRS can only be measured in terms of the inputs that have been allocated to the strategy. For example, has training been delivered? Is equipment in place and properly maintained? Are communication links with partners in place and tested?

2.4.2 Setting standards

From examining the IRMP planning cycle, it would appear that the issues of performance measurement discussed above should be described in Chapter 5 of this document under the heading *monitor*. However in order to monitor a process, it is necessary to have a predetermined performance standard against which to compare delivery. Also, in order to develop a delivery strategy in the first place, it is necessary to have a performance standard to aspire to in order to set the level of delivery. Hence, performance standards in terms of outcomes must be set at this stage. Performance standards in terms of outputs and inputs must also be set before monitoring can take place, but these can only be set once a strategy has been developed (See Figure 7).

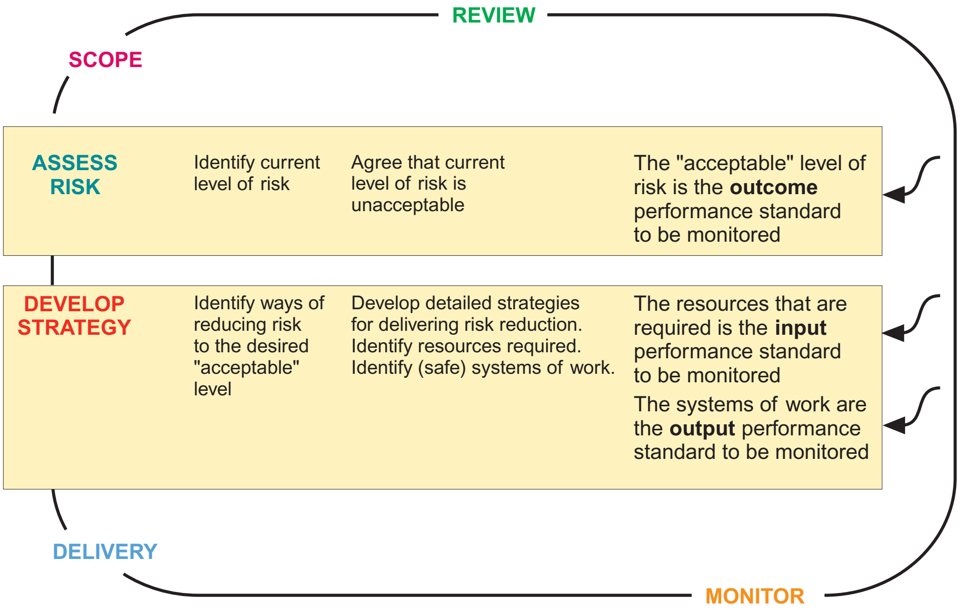


Figure 7: The setting of outcome, input and output performance standards

Long term outcome performance standards need to be set at the risk assessment stage of the IRMP planning cycle simply because the result of a risk assessment is a measure of the overall risk of an event. The process of deciding that the overall risk of an event is so high that a delivery mechanism must be adopted to reduce it, is implicitly setting a broad outcome performance measurement. The outcome of the delivery mechanism is to reduce the overall risk.

With a simple health and safety risk assessment, if a risk is assessed as 'high', a mechanism is usually put in place to immediately eliminate the risk or to reduce it to an acceptably low level. The 'outcome performance measure' would be that the risk no longer exists, or is 'acceptably low'. An FRS is managing a vast range of risks across a large population, the process is therefore more complicated than that of a simple health and safety risk assessment.

Often, a delivery mechanism will not eliminate the risk or reduce it to an 'acceptable level' within a single IRMP cycle. In such a case, an outcome performance standard may need to be set that is challenging, but that is still an unacceptable risk. Fire death is an example of such a measure.

The only acceptable level of the risk of fire death is zero. However no strategy will achieve that in a single IRMP cycle. A successful outcome of a strategy might therefore be measured as a reduction in fire deaths of, say, 20% over 5 years as measured against the previous 5 year period.

It must be stressed that one of the functions of the IRMP process is to facilitate openness in a public sector organisation. As such, any performance standards that are set must be made publicly available within IRMP documents. The following is adapted from a real IRMP. It was the only description of standards or targets under the heading "*How Success will be Measured*":

> *A Performance Management Framework will be used to measure progress against this* IRMP *and the annual action plans. Quarterly performance reports will be returned to Fire & Rescue Authority. Reporting methods will comply with the County Council Performance Management Framework.*

All of which is commendable, but it is most definitely not transparent to members of the public.

Partners including the public and business representatives should be involved in identifying performance measures and setting targets. Performance against those targets should be openly and transparently reported in the same way. For example, *number of non-domestic fires* is used by many FRSs as a measure of performance, but the insurance industry is just as concerned that FRSs should measure their performance against the *cost of non-domestic fires*. Large fire losses result in increased insurance premiums for all businesses and this feeds into increased prices and/or lost business.

2.5 Consultation on the approach

The risk assessment itself is a technical job that requires the collection and analysis of significant amounts of data from a wide variety of sources. Stakeholder consultation does not really play a part in this technical process.

However, the initial task of understanding the fundamental concepts (and conflicts) of wide scale community risk management and thereby developing a philosophy of community risk, is very much an issue that should be the subject of public debate. It is that debate that must inform the professional judgement of those who are involved in assessing risk, and who are considering methods of risk reduction.

NOTE: It must be stressed very strongly that the terminology used in such a debate should steer well clear of the terminology used in this document. This document is for the consumption of fire industry professionals and those who direct them, the debate must be accessible to all – including members of the public and those from the business community to name but two.

It is common for an IRMP to fail to consider the wide range of conflicting but equally valid approaches to risk management. But failure to have that philosophical debate leads to situations where the safety of the public and the security of their property is left in the hands of accountants and computer programmers, instead of the hands of those who are elected to provide governance to FRSs.

A telling comment in a recent report said that:

> "*The* FSEC *Toolkit provided the main sources of guidance with the majority of* FRSs *asserting that* FSEC *is a useful tool that provides a robust check of professional judgement*".

The meaning of the quote is ambiguous, but FSEC is a piece of software written by computer programmers who have neither been appointed nor elected to manage community risk. Computer programmes have no concept of self, let alone a fear of death from fire or accident.

Professional judgement should provide a robust check of FSEC.

The Welsh guidance on RRP emphasises this fact when it states:

> "*The use of computer modelling must not be the sole factor in taking such decisions. Authorities will need to validate the information provided by* FSEC *from other sources and in discussion with personnel, experts in the field and communities affected by the decisions*".

The following is an extract from the English government's Guidance Note 2:

Examples of proposals for change	Who should be consulted?
Alteration in the policies/standards set by the fireauthority for attendance to specific types of emergency incident	• Communities, business organisations, and local authorities in the area covered by the appliance(s) concerned • Employee representatives

That is, FSEC and other computer risk models are not a source of guidance, they are tools that should be used to help work out the best way to deliver the standard of service demanded by the community.

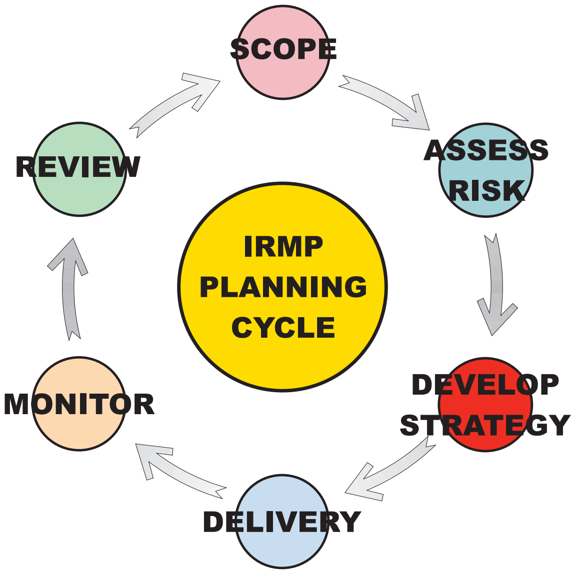
In terms of finance, the same report quoted above states:

> "FRAs *were still being dominated by members who would resist proposals for securing efficiencies, however strong the arguments presented in* IRMPs".

Again the quote is ambiguous in that it does not say that resisting proposals for securing efficiencies is a bad thing, but the implication is clear.

It is true that *value for money* and *cost effectiveness* are objectives of the IRMP process, but accountants, finance managers and auditors are not even included in any list of IRMP consultees. It is the role of FRA Members to weigh the human voice of public consultation against the clinical calculations of "*efficiency*". If FRA Members simply rubber stamped everything that led to "*efficiency*" they would effectively be handing over control of the FRS to accountants and auditors – while still retaining their own legal and moral responsibility for public safety.

Chapter 3 – Develop Strategy



3.1 Selecting strategies

3.1.1 Selecting strategies based on risk

Once risks have been assessed, strategies can be developed to address those risks that are proportionate to the magnitude of the likelihood and the impact of the event. It is at this stage that aspects of the scope such as regional and national interfaces, and legislative controls really come into play.

For dealing with response commitments, strategies can broadly be divided into three areas:

(1) Prevention

(2) Protection

(3) Intervention

These three terms are not clearly defined in any of the available literature. For the purposes of this document:

Prevention strategies are those strategies that are targeted wholly or primarily at eliminating the possibility of an unwanted event occurring, or reducing the likelihood of an unwanted event to a level as low as is reasonably practicable.

Protection strategies accept that unwanted events will occur. They recognise the fact that there will be a time delay between the event and the intervention of the FRS, and that harm can be caused during that time. Protection strategies are therefore targeted at eliminating or reducing the immediate impact of the event through systems incorporated into buildings, vehicles etc, or through management systems and training.

Intervention strategies accept that unwanted events will occur. They are targeted at eliminating or reducing the impact of the event through the intervention of FRS resources either acting alone, or acting in concert with partners.

3.1.2 Changing strategies based on past performance

When selecting a strategy to address a risk for the first time, the FRS effectively has a free hand to select whatever delivery strategy it thinks will be most effective and will encompass all of the controlling/limiting legislation. However when selecting a strategy for an existing risk that has already gone through one IRMP cycle, the FRS must take account of the actual measured effectiveness of past strategies.

During the risk assessment stage of the IRMP planning process, the FRS will have set outcome performance standards that it wants to meet. Meeting these standards will effectively confirm that the level of risk that was identified has been reduced.

It may not be practical to measure outcomes when assessing the success of strategies for dealing with infrequent risks (like domestic fire death in a shire county for example), or when assessing the success of strategies for dealing with risks that have not materialised (like severe flooding in a coastal FRS). In these cases, during the strategy development stage of the IRMP planning process, the FRS will have set output and input performance standards that, if met, will indicate that the FRS is likely to deliver the desired outcomes if and when the strategies are put into practice.

Performance standards will also be set by external agencies such as government and their agencies, and possibly by strategic partners seeking evidence that community strategies are being achieved.

Under the heading of *monitoring*, the FRS will examine the results of performance measurement to identify areas where strategies have been successful, and areas where they have failed.

Under the heading of *review*, the FRS will consider what remedial action to take in order to address areas where strategies have failed.

The FRS cannot take no action and continue to implement strategies that have demonstrably failed to deliver the desired performance. In such cases, the FRS only has two options:

(a) The existing strategy must be amended and improved.

(b) A new strategy must be developed that is more likely to succeed.

There is a third option that is to continue with the existing strategy, but to set less challenging targets for the next IRMP cycle. However, this is effectively an admission that either poor judgement was applied in selecting the initial targets or that the FRS is 'giving up' on proactively attempting to improve its service delivery.

Selecting this third option is therefore not a decision that can be made by middle managers in an FRS. It should only ever happen after informed debate between senior FRS managers, key stakeholders and elected members at Fire and Rescue Authority level.

(See also Section 7.2 of this document.)

3.2 Other strategies

Before considering prevention, protection and intervention in detail, it should also be pointed out that there are other strategies open to an FRS as well.

3.2.1 Doing nothing

If the risk of a particular event is very low, or if the cost (in terms of time finance or effort) of developing and delivering a response is out of proportion to the risk, it is feasible that the FRS could adopt a strategy of *doing nothing*, and/or a strategy of sharing the management of the risk with partners.

However, it must be emphasised that adopting a strategy of *doing nothing* is not the same as *not having a strategy*. To explain, imagine that cave rescue was identified as potentially being within the scope of the IRMP. The assessment of the risk might highlight that while cave rescues are necessary from time to time, FRS involvement is unlikely because of the role played by the Cave Rescue Organisation.

The FRS might then consider the cost of developing and implementing a strategy to carry out occasional cave rescues. Given the amount of training and equipment necessary for such a strategy to be implemented while maintaining the health and safety of employees, the FRS could decide that they will adopt a *do nothing* strategy for cave rescue.

If such a decision is made, it does not mean that the FRS will mobilise to cave rescues without equipment or properly trained personnel. What it does mean is that if a call is put through to the FRS to report a person trapped in a cave, the FRS *will not respond*. They will refer the caller to the Cave Rescue Organisation.

NOTE: Adopting a do nothing strategy for cave rescue is only an example used for illustration. It is not a policy or a recommendation of the FBU. Every FRS must develop its own strategies according to locally assessed risk, and in conjunction with negotiation with FBU officials at the local level.

An equally bad situation is where an FRS recognises something like cave rescue as being in scope, but does not assess the risk, and then goes ahead with developing and implementing a strategy without considering the true cost, and without considering how the strategy impacts on other activity (how it will *integrate* into other *risk management plans*).

In this situation, an FRS might find that it has inadvertently diverted significant resources away from firefighting (where dozens of people are rescued and millions of pounds worth of property are protected) in order to help one pot-holler every other year who finds themselves stuck in a cave and could actually be rescued by the Cave Rescue Organisation.

3.2.2 Limited intervention

In some circumstances, the FRS may determine that developing a strategy to deal with a response commitment in full is not viable. Again such a decision would have to be based on a balance between the size of the risk and the cost of the strategy. However, rather than select the 'do nothing' strategy, the FRS may identify a limited scope of operation. Additionally, the FRS may identify partners who would be able to provide the necessary resources to fully deal with the response commitment.

An example of an FRS applying limited intervention in partnership could be incidents like cliff rescues, where an FRS may decide to provide assistance on level ground, but to leave the rescue itself to Mountain Rescue or the Maritime and Coastguard Agency.

Strictly limited intervention might cover incidents such as water rescues. An FRS may decide to develop and resource strategies to attempt rescues by entering still water or rivers under normal conditions. However they may decide that the resource implications of entering coastal waters or at rivers in flood are excessive.

NOTE: Neither of the limited intervention strategies described above are being recommended or condoned by the FBU. They are simply examples of potential strategies. Every FRS must develop its own strategies according to locally assessed risk, and in conjunction with negotiation with FBU officials at the local level.

It was stated previously in this document that the fire and rescue service often describes itself as the "can do service". In practice, limited intervention strategies must take this into account. Faced with a humanitarian crisis like a child marooned on a cliff, it may be unrealistic to expect firefighters and their managers to comply with a strategy that requires them to attend the incident, but then expects them to stop their activities before they have completed the task while they wait for another agency to arrive at the scene. It is reasonably foreseeable that firefighters are likely to "have a go" even though they are untrained and lack appropriate equipment. Taking human nature into account in service delivery is discussed in Chapter 4.

3.2.3 Sharing the management of risk

According to the English CLG publication Fire and Rescue Service partnership working toolkit for Local Area Agreements:

> "*The* Local Government White Paper Strong and Prosperous Communities, *published in* October 2006, *heralded a challenging new agenda for local government and the role of partners, including the* Fire and Rescue Service, *in delivering better outcomes for communities*".

This challenging new agenda in England involves the FRS working in a Local Strategic Partnership with other local government agencies, the private sector and the voluntary sector. Fundamentally, it is about recognising that issues that affect society are all inter-linked and effect one-another. As such, it is inappropriate for local government departments to be insular about their roles in tackling the issues that affect a community.

By way of an example, the CLG document says:

> "*Reducing car fires, rubbish fires, bin fires and fires in derelict buildings is a part of resolving anti-social behaviour*

and creating a community environment that people respect. It is also important to identify the causes and tackle the symptoms through activities or initiatives such as youth work".

That is, car theft, fly tipping, the security of empty buildings, arson, anti social behaviour, the fear of crime and youth engagement activities are all intrinsically linked to one another.

While the references used here are English, it is true across the whole of the UK that incorporating this agenda into IRMP could involve an FRS identifying arson prevention as being within the scope of IRMP, but then deciding that a strategy for delivering arson prevention will be to reach an agreement with the local Waste Management Services to remove rubbish from key high arson risk locations.

Partnership working

Linked to the concept of sharing the management of risk, it is worth noting that the use of firefighters to undertake activities such as the removal of rubbish from key high arson risk locations is not a sensible use of Fire & Rescue Service resources, except in exceptional circumstances.

It may well lead to a reduction in arson and therefore the creation of a community environment that people respect. But there are other local partners who's role is to undertake such activities (and they do so at much lower cost).

The Fire & Rescue Service is the *only service* that is capable of firefighting, rescue, and the delivery of high quality fire prevention advice. Firefighters should spend their time preparing for, planning and delivering these activities.

"Working in partnership" means different agencies delivering their own services in a co-ordinated way towards a common goal. It might mean a limited degree of "crossover" (such as simple home fire safety advice being delivered by social care agencies while they are visiting people's homes anyway). But it does not mean one agency doing the work of another to the detriment of its ability to deliver its own unique core business.

3.3 Health and safety

Some who work within the fire and rescue industry are occasionally guilty of understating the health and safety risk to personnel who work for fire and rescue services. While firefighters are injured and even killed at work from time to time, it is said that compared to other countries and compared to industries such as the building industry, the UK fire and rescue service has a good record.

This is a gross misrepresentation of the real situation. Firefighters work inside burning buildings, in close proximity to pressurised vessels, on motorways and railway lines, in confined spaces, at height and in contaminated flood water. Against some international comparisons, UK FRSs have a reasonable safety record, but this is not because firefighting is a 'low risk occupation', it is because historically, firefighters have the right tools to do their job, and because those tools are maintained to a high standard. It is because firefighters have carefully thought out procedures to maintain safety in hazardous situations. It is because firefighters are trained to understand and respect the environment they work in, and are sufficiently disciplined to continuously consider the safety of themselves and their colleagues.

However, the FBU document *In the Line of Duty* published in 2008 provides evidence that over recent years, some of the above has been eroded and firefighter fatalities have been increasing. In many FRSs, The time freed up by the decreasing frequency of fire calls has been filled up with community safety activity amongst other things. Community safety is important, but to ensure a safe workforce, enough of this new time needs to be filled with operational training to maintain competence to compensate for the reduction in practical experience.

IRMP delivery strategies cannot be developed in a 'bubble' that excludes health and safety. Health and safety (especially time for realistic operational training) must be woven into every activity of a potentially high-risk employer such as an FRS. It is essential that every delivery strategy that is considered is analysed against the background of health and safety. Every delivery strategy must have its health and safety implications taken into account when it is considered, and health and safety must be an integral part of every delivery strategy that is adopted.

3.3.1 FBU involvement

Most managers in the FRS have had their own personal experiences in a number of roles within the organisation. It is therefore possible that managers developing IRMPs may decide to draw on these personal experiences to integrate health and safety into the process. This is a very good start, but personal experiences can only ever be limited in their extent and this approach to the integration of health and safety is likely to be incomplete.

FRSs are fortunate in that the majority of their employees are members of a single representative body, the FBU. By involving the FBU in the IRMP planning cycle, the FRS has the opportunity to draw on the combined experiences of the majority of its workforce when considering the health and safety implications of potential systems of service delivery work.

3.4 Selecting delivery strategies

Reference here should be made back to Paragraph 2.2.3 combining likelihood and impact in Chapter 2 of this document. Many risks can be addressed by any one of a series of delivery strategies or more usually, by the selection of a number of different delivery strategies. The core business of an FRS is the management of a range of societal risks and the method by which delivery strategies are selected, and the weight that is attached to each of them must be in line with the organisation's philosophical approach to the management of societal risk.

3.5 Fire prevention and protection

3.5.1 Domestic and residential

- Domestic and residential fires account for the majority of fire injury and death in the UK.
- It is a fundamental principle of risk management that prevention is better than cure.

It is therefore understandable that domestic and residential fire prevention should be at the top of the agenda for any FRS.

Strategies must be developed for the delivery of domestic and residential fire safety through fire prevention and protection.

A great deal of advice on this subject already exists, and it would not be of value to repeat that advice or even to summarise it in this document. Instead, this document will describe how that advice should fit into the IRMP planning cycle.

Scope

- Domestic and residential fire will always be in the scope of an IRMP.

Risk assessment

- In assessing the risk associated with domestic and residential fire, use should be made of historic data within the FRS, as well as socio-economic mapping of the FRS area matched with known 'at risk' groups.
- Outcome performance targets need to be set based on the assessed risk.

Developing strategies

- It is common for FRSs to develop strategies that aim to reduce the incidence of fire in 'hot spots' that have been identified using historic data. However combining socio-economic mapping with historic data can sometimes reveal areas that would be expected to be 'hot spots', but that actually have a low incidence of fire.

  Developing a strategy to investigate these 'cold spots' may reveal solutions that can be applied in areas of high fire incidence.

- Strategies do not need to be limited to geographical areas. They may be developed to target particular groups of people who are dispersed throughout the wider community.
- As with any strategy, a domestic fire prevention strategy must be considered in light of health and safety considerations.
- Strategies that involve partnership working with other agencies can share the workload. Partners may be able to address the root causes of fire (such as drug or alcohol dependence) whereas working alone, the FRS could only provide marginal fire protection (a domestic smoke alarm).
- Output performance targets need to be set in order to measure the day-to-day performance of delivery mechanisms. In the case of most FRSs, domestic fire is too infrequent an event for performance to be measured on the basis of outcomes alone.

Monitoring

- Over recent years, governments have placed emphasis on the need to strike a balance between fire prevention, protection and intervention. In terms of injury and death caused by domestic and residential fire, this is a very difficult thing to do. The value of intervention could be measured as the number of people rescued from fire by FRS resources. The value of protection could be measured by the number of people who make their own way to safety in a fire. However the value of prevention could only be measured by the number of fires that do not start in the first place.

  Therefore, almost every non-domestic fire generates data that can be used to measure the outcomes of intervention and protection strategies, but the outcome of prevention strategies can only be measured with a great deal of number crunching of data collected over a long period of time or over a large geographical/social area.
- Despite the difficulties associated with monitoring the outcomes of non-domestic fire prevention strategies, it is essential that such monitoring takes place. In truth, it is impossible to find the balance between fire prevention, protection and intervention (if the philosophy of risk is such that a balance is considered to exist in the first place), unless the outcomes of all three are monitored, quantified and compared.
- Intervention strategies cannot be offset against prevention strategies if the effectiveness of prevention strategies are unknown.

Review

- Only if quantified data has been collected that clearly demonstrates that a prevention strategy delivers the desired outcomes, can consideration be given to scaling back intervention strategies.

  Even then, reference should be made to Paragraph 2.2.3 *combining likelihood and impact* in Chapter 2 of this document. Prevention strategies manage average societal risk, whereas intervention strategies manage the individual risk faced by those who are experiencing a fire. Whether or not they can truly be offset against one another is a philosophical question that should be the subject of informed public consultation.

3.5.2 Legislative fire safety

Balancing domestic and non-domestic

More people are killed and injured by fire in their homes than are killed or injured in fires in workplaces and public buildings. The ratio is approximately 10 to 1. It is therefore reasonable that governments should direct their FRSs to focus their prevention and protection activities on domestic fire.

However, IRMP is defined (by English publications) as a process "*to identify, measure and mitigate the social and economic impact that fire and other emergencies can be expected to have on individuals, communities, commerce, industry, the environment and heritage*".

Scottish and Welsh documents do not define IRMP/RRP so succinctly, but they all recognise that sustainable communities are not achieved simply by ensuring that people do not have fires in their homes. Schools, factories, shops, pubs, historic buildings, economic prosperity and employment are all integral parts of the community, and the FRS has a duty to prevent their loss by fire.

The primary tools for the prevention of fire loss in the non-domestic environment are the provision of advice, and the enforcement of legislation.

New fire safety legislation[6]

Until recently, fire safety legislation in the UK was often referred to as 'stable door legislation'. This was a reference to the fact that each piece of legislation was only introduced to address a specific area of risk that had been identified following a multiple death fire. New fire safety legislation was hailed as a change to this process in that it was not written in response to a tragedy.

In theory, the introduction of the new fire safety legislation should make little difference to the standard of fire safety in industrial, commercial and leisure buildings. This is because it did not introduce any new requirements, it simply amalgamated the requirements already described in existing pieces of legislation.

However, there is a risk that the new fire safety legislation is enforced in a way that forgets that it is in fact an amalgamation of several legislative bolts on a large number of stable doors.

There were relatively few multiple death fires in non-domestic buildings in the UK towards the end of the 20th Century. While that can be attributed partly to improved building design and improvements in the fire safety of some building products and contents, a proportion of the credit has to go to the stable door legislation and the way in which it was enforced.

Responsibility

Much is made of the fact that new fire safety legislation makes a "responsible person" responsible for fire safety in non-domestic premises. However this does not negate the fact that IRMP is a process "*to identify, measure and mitigate the social and economic impact that fire .... can be expected to have on individuals, communities, commerce, industry, the environment and heritage*".

That is, while a "responsible person" may be responsible in law for the fire safety of a premises, the FRS still has a responsibility to make sure that the "responsible person" complies with the law. The invention of the "responsible person" has not taken any responsibility away from the FRS.

In resourcing a strategy for the enforcement of fire safety legislation, an FRS must not misunderstand the meaning of "responsible" in "responsible person". Calling someone a "responsible person" does not mean that they are a person:

> "*of good credit, position, or repute; respectable; evidently trustworthy*".

It means that they are:

> "*liable to be called to account*".

Being "called to account" for failing to comply with fire safety legislation may be justice, but it is of little comfort to those who lose their place of work, to the injured, or to the families of the dead.

If standards of legislative fire safety enforcement are reduced to divert resources to domestic fire prevention, it is foreseeable that the UK could see a return of multiple death fires in hotels, factories, shops and night clubs. If that happens, "responsible people" will find themselves prosecuted under the new fire safety legislation, but it will still represent a failure of an FRS's legislative fire safety enforcement strategy.

IRMPs must include strategies for dealing with the risk of fire in non-domestic premises, and part of those strategies must include the provision of fire safety advice, and the enforcement of fire safety legislation. To find out the risk of not doing so, the FRS must look at non-domestic fire data from before 1971.

Assessing the whole impact

In determining the level of resources that are dedicated to strategies to deliver non-domestic fire prevention and protection, reference should be made to Chapter 2 of this document and the list of factors that should be considered when assessing the impact of an emergency event.

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[6]The Regulatory Reform (Fire Safety) Order 2005, The Fire Safety (Scotland) Regulations 2006 and the Fire and Rescue Services (Northern Ireland) Order 2006.

A fire in a warehouse is unlikely to result in injury or death, but products of combustion cause pollution and affect roads and railways, the resulting property damage will have an economic impact on the local business community.

A fire in a factory is unlikely to result in injury or death, but the resulting property damage can cause business interruption, it will have an economic impact on the business, and could result in job losses.

Even a fire in an unused empty building has wider social consequences. Burned out buildings make communities appear devalued, and they contribute to a downward spiral of decreasing community cohesion.

3.5.3 Arson

Arson is the largest single cause of non-domestic fire loss. As a result, if a strategy were to be developed to address non-domestic fire loss in general, it would focus almost entirely on arson prevention because that would have the most impact. However, such a strategy would fail to address many significant fire risks, and would ultimately lead to a deterioration in the standards of fire safety in many premises.

As a result, it is common practice to extract arson from general fire prevention and protection strategies, and to treat it as a special case. Arson prevention is specifically stated as being in the scope of the IRMP. Arson is risk assessed, arson reduction targets are set, and arson prevention strategies are developed, delivered and monitored.

3.5.4 Working beyond FRS boundaries

It should also be remembered that many fire prevention and protection issues are controlled by forces that extend beyond the boundaries of a single FRS. The drafting of building regulations, the production of British and European standards, the adoption of reduced ignition propensity (RIP) cigarettes and the encouragement of greater residential sprinkler installation to name but a few.

Many FRSs devote resources to these high-level strategies even though their impact is national rather than local. This type of work should not be ignored by the IRMP process. It has the potential to make a significant impact on the level of local risk.

One of the greatest contributors to the falling numbers of residential fire deaths over recent years is almost certainly the introduction of the Furniture and Furnishings (Fire) (Safety) Regulations 1988 (the foam filled furniture regulations). Research published in 2000 by the University of Surrey, commissioned by the Department of Trade and Industry, gave a 'very conservative' estimate that the foam filled furniture regulations had saved at least 710 lives (1,860 when additional factors are taken into consideration) and prevented at least 5,770 injuries from 1988 to 1997.

3.6 Protection

Protection strategies are targeted at eliminating or reducing the immediate impact of an event through systems incorporated into buildings, vehicles etc, or through management systems and training.

While there is a clear difference between prevention and protection, they are frequently tied together because they are both strategies that focus on the activities of the person at risk – as opposed to intervention strategies that focus on the activities of the FRS.

However, in the development of strategies, it is useful to recognise that there is a difference between prevention and protection, and that prevention should be the first option where there is a choice. To use a health and safety analogy, ideally the risk of a chemical leak in a factory would be managed by replacing dangerous chemicals with less dangerous ones (prevention). If this could not be achieved, protective clothing could be issued to employees (protection).

Protection strategies can include improvements in product design, changing people's behaviour, the use of systems such as smoke detection and sprinklers in buildings, or airbags and seat belts in cars. It can also include road design – working with partners to identify locations where the use of road furniture with weak support points will help protect people from injury. It can also include management of the natural environment – encouraging the cutting of fire breaks in heath land can restrict the spread of wildfires.

3.6.1 Performance standards

As with any strategy; outcome, output and/or input standards must be set in order to manage performance. It is particularly important here to remember the difference between prevention and protection. For example, the frequency of death and injury by fire should be reduced by a strategy of fitting domestic smoke alarms, but such a strategy will not affect the frequency of fire itself. Of course, the early detection provided by domestic smoke alarms might mean that more fires are dealt with in their early stages by householders, so the frequency of fires *reported to the* FRS may be reduced.

3.7 Intervention

3.7.1 Call receiving and handling

Call receiving and handling is an integral part of any FRS. For the emergency response strategies of the FRS to work properly, it is essential that call receiving and handling is carried out in line with local intervention strategies and more general response commitments.

- In the event of an emergency, the first point of contact that the public has with the FRS is almost invariably with fire control.
- FRS resources are managed from fire control.
- In the event of a large-scale incident, FRS managers make command and control decisions from fire control when fire control is often designated 'silver command'.
- Fire control staff can be dispatched to prolonged incidents to assist in the running of incident command vehicles often designated as 'bronze command'.

It is therefore essential to the efficient delivery of intervention strategies that fire control procedures and facilities are governed by strategies that are in line with, and support, the delivery of the wider intervention strategies of the FRS.

If local fire controls are replaced with regional controls in England, there is a risk that this essential process could be reversed. The intervention strategies of the FRS will be governed by what can be delivered by a remote and independent fire control and its procedures and facilities. This risk should be averted by the adoption of suitable strategies prepared and presented through the IRMP process that are discussed at FRA level and that go through consultation with the FBU.

3.7.2 Weight of attack

Emergency cover is most frequently described in terms of speed and weight of attack. It is considered in terms of both the initial pre determined attendance, and then in terms of subsequent support for a worst likely case scenario.

In determining a strategy for emergency cover, reference should be made to the outcomes of similar events in the past, and the effect of different levels of emergency cover. Reference should also be made to the FBU's 2004 publication *Integrated Risk Management Planning The National Document*. This document describes Critical Attendance Standard (CAST) planning scenarios that describe suitable resource requirements for a wide range of incidents that the Fire and Rescue Service is now expected to deal with.

3.7.3 Intervention – v – attendance

FSEC, generic risk assessments and the FBU's CAST scenarios all model both the material and the human resources required to safely intervene at a range of emergency incidents. These models are invariably based on the assumption that fire appliances (especially the first appliance to arrive on scene) will have a crew of five.

Therefore, according to these nationally accepted models, when crewing appliances with only four firefighters, the attendance of one or even two appliances at a property fire will probably not be sufficient to safely undertake offensive firefighting or to carry out anything but snatch rescues.

A "weight of attack" of two appliances with 8 crew is therefore not the same as a "weight of attack" of two appliances with 9 or 10 crew. This must be taken into account when developing strategies.

It also must be taken into account when reporting performance to the public.

It would be reasonable for the public to assume that the same level of service is being provided by two different FRSs who both have a performance standard of two appliances to arrive at incidents within 10 minutes. However if one FRS only has 8 crew on those two appliances, while the other has 10, then the former cannot offensively intervene or carry out rescues until a third appliance arrives. Whereas the latter can do so on arrival of the second appliance.

Failing to point this out to the public would represent a lack of transparency.

3.7.4 Speed of attack

As previously stated in chapter 2, for example, ENTEC Reports 1996 & 1998: '*National Risk Assessment of Dwellings*' & '*Response Time Fatality Relationships for Dwelling Fires*' indicated that the probability of fire death was linked to attendance time of fire appliances. If appliances could attend in less than 5 minutes, the probability of death was 3.8 per hundred fires. If appliances took 6 to 10 minutes to attend a fire, the probability of death was 4.2 per hundred fires.

For property loss, the Home Office examined the statistical relationship between attendance time and spread of fire in other buildings from 1994 to 1997. It was found that where appliances attended in less than 5 minutes, only 25% of fires caused more than $5m^2$ of damage. If appliances took 6 to 10 minutes to attend a fire, 35% of fires caused more than $5m^2$ of damage.

The difference between the effect of a less than 5 minute attendance speed and a 6 to 10 minute attendance speed is sometimes described as "minimal". FRSs adopt attendance speed strategies of 6 to 10 minutes rather than 'less than 5 minutes' because it is argued that the difference in outcome will be "minimal". However according to the figures above, this difference statistically represents 4 deaths per thousand fires, and 10% more fires spreading beyond $5m^2$. Steps could be taken to offset this gross increase in statistical risk across a geographical area by simultaneously adopting prevention and protection strategies, but;

(a) there is little quantitative evidence to demonstrate the effectiveness of prevention and protection strategies and

(b) while a combination strategy may address the gross societal risk, once an individual home is on fire, injury and loss are entirely dependant on the quality of emergency cover.

3.7.5 Local standards

Great emphasis has been placed on the fact that IRMP replaced national minimum standards of fire cover. Since the introduction of IRMP, emergency cover has therefore been seen as a 'local issue' with speed and weight of attack being determined by individual FRSs at a local level.

However, the Scottish IRMP guidance states that:

> *"An authority's IRM requires to consider both national and local level issues. At national level there is a need to embrace schemes such as integrated emergency management as detailed within the Dealing with Disasters Together document. There is also the need to meet requirements for civil contingencies and national resilience as developed under the New Dimensions Initiative".*

English and Welsh guidance contain almost identical statements.

- It is not uncommon for emergency incidents to involve the resources of more than one FRS.
- Along borders, it is common for one FRS to provide emergency cover to the community of another FRS.

- Towns and villages near to county borders, and towns and villages in similar geographical and economic situations in different parts of the country, share almost identical risks.

It may be the case that emergency cover is a 'local issue'. But neighbouring FRSs and geographically remote FRSs who cover geographically, socially and economically similar areas share similar if not identical risks. They assess those risks using identical computer risk management tools operated by managers who meet nationally agreed standards of competence. Under such circumstances, it is difficult to explain why there should be differences in strategies for emergency cover.

	Fire & Rescue Service A	Fire & Rescue Service B
Area:	834 miles^2	1013 miles^2
Population:	1,055,400 94.1% White 2.5% Asian 1.5% Afro Caribbean	990,440 96% white 2.3% Asian 1.7% Black British, mixed race or Chinese
GDP:	£12,023 (1998)	£10,979 (2003)
County town:	286,400 people 9,673/sq mile	236,300 7842/sq mile
Emergency cover standard:	An appliance within 10 minutes anywhere in the county on 90% of occasions.	An appliance within 8 to 10 minutes minutes in built up areas. An appliance in 20 minutes in remote rural areas.

Figure 8. Comparison of two (real) neighbouring counties

It may be that the population of the two counties compared in Figure 8 have been fully briefed on the workings of their respective FRSs, have been consulted on the philosophy of risk management, and have directed their FRAs to adopt different levels of emergency cover in light of a cost benefit analysis and the role of value for money.

In practice however, this is unlikely to be the case. Even if it is, it is incumbent upon neighbouring FRSs to agree upon a level of emergency cover along common borders. If FRS 'A' relies upon FRS 'B' to provide emergency cover to part of its community near to its border, does FRS 'B' provide that cover to its own standard, or to the standard of FRS 'A'? Has the local community been made aware of their situation?

In most cases, where the level of emergency cover provided by an FRS has been altered from the old national minimum standards as part of the IRMP cycle, it has not been developed following full and detailed consultation with an informed local community. Instead, it has been developed by local FRS managers working in isolation. As a result, it is not uncommon for two neighbouring towns to have different levels of emergency cover, simply because they are located in different counties, not because their level of risk is different.

It may be that FRS 'B' justifies its lower standard of emergency cover in rural areas by greater investment in fire prevention. However the arguments against this balance must be addressed:

(a) There is little quantitative evidence to demonstrate the effectiveness of prevention and protection strategies and

(b) while a combination strategy may address the gross societal risk, once an individual home is on fire, injury and loss are entirely dependant on the quality of emergency cover.

Following several IRMP cycles where intervention strategies have been developed without informed public consultation and uncoordinated between neighbouring FRSs and FRSs in family groups, the FRS nationally is open to description as a 'post code lottery'. The reputation of the whole service is put at risk by this situation.

Neighbouring FRSs and FRSs that are remote from one another but that cover similar geographical, social and economic situations in different parts of the country, should work in partnership across their borders. They should either bring their emergency cover standards into line with one another (via the IRMP process), or at the very least they should ensure that any differences can be robustly defended using sound quantitative data.

3.7.6 Minimum standards

When developing local standards of emergency cover in partnership with neighbouring FRSs and others, it is important to remember that IRMP replaced national *minimum* standards of fire cover. It was incumbent on FRSs to exceed these minimum standards wherever possible.

When local standards are set, they should also be seen as *minimum* standards, not targets. Every effort should be made to exceed local standards. The fire and rescue service is an emergency service where seconds count when it comes to intervention, and other delivery strategies must not be allowed to take priority over intervention.

It is an accepted practice in the management of risk that 'prevention is better than cure', but this only applies during the process of management. Once an unwanted event occurs, 'cure' must be given the highest priority. If an emergency incident is reported to an FRS, the nearest resource with the capability to deal with the event must be mobilised, even if that resource is delivering prevention advice, and even if a more remote resource can still attend the incident within the local attendance standard.

Data previously described shows that the probability of death in fire for attendance times of less than 5 minutes and attendance times of 6 to 10 minutes differ by 4 deaths per hundred fires. This does not mean that an FRS can take an area where fire appliances have historically attended fires in less than 5 minutes, alter standards of emergency cover and mobilisation policies so that future attendance times will be 10 minutes, and expect the probability of fire death to increase by "only" 4 per hundred fires.

The data that describes the probability of fire death as being 4.2 per hundred fires covers a distribution of fires that were attended between 6 and 10 minutes. A mathematical assessment of the data suggests that for incidents where attendance actually takes 10 minutes, the probability of death is 4.7 per hundred fires. This is 25% higher than the probability of death where attendance takes less than 5 minutes.

3.7.7 Operational guidance, workforce skills and resources

Operational guidance, workforce skills and resources are not matters that should be seen as being within the scope of the IRMP process. In themselves, they are not core business or response commitments of an FRS (however research and the preparation of documents addressing these matters would have to be accounted for in the IRMP process because such activity would inevitably have to be resourced).

When considering the scope of the IRMP, it was said that controlling legislation does not need to be risk assessed, delivered or monitored. Rather, FRSs must develop strategies, delivery mechanisms and monitoring procedures for core business streams *that take controlling legislation fully into account and that compare performance against the requirements of the controlling legislation*.

A similar thing can be said for operational guidance, workforce skills and resources.

This chapter describes the stage in the IRMP cycle of developing strategies to address core business streams that have been identified as being in scope, and that have been assessed as presenting a risk sufficient to warrant a response. Operational guidance, workforce skills and resources are not core business streams. They are effectively filters through which any potential strategy must pass before it can be adopted as a delivery mechanism.

Consider Figure 9. In developing a strategy to deal with environmental and pollution risks it would be wrong to simply set standards for speed and weight of attack and to expect crews to deal with the risk when called upon to do so and achieve the desired performance outcome. A strategy should reference the work processes that are expected to be followed (operational guidance). It should include a description of the workforce skills that are necessary to put those work processes into practice in a safe and efficient manner and it should also describe the human and material resources that are necessary for the process to work.

Therefore, in considering the suitability of a delivery strategy, operational guidance must be consulted where it exists, and developed where it does not. An assessment must be made of workforce skills and resources necessary to achieve the performance outcomes safely and effectively. If workforce skills are insufficient, then either (a) a different strategy must be developed to deal with the risk or (b) the strategy must include a description of the skills gap and an appropriate training procedure to fill that gap. Even where workforce skills *are* deemed suitable and sufficient, the strategy must describe how those skills are to be maintained.

In the same way, if material resources are insufficient to deliver the desired performance outcomes safely and effectively, then either (a) a different strategy must be developed to deal with the risk or (b) the strategy must include a description of the resources that are required and how they are to be procured.

Finally, through all of this, legislative and other external influences such as health and safety must be constantly fed into the process.

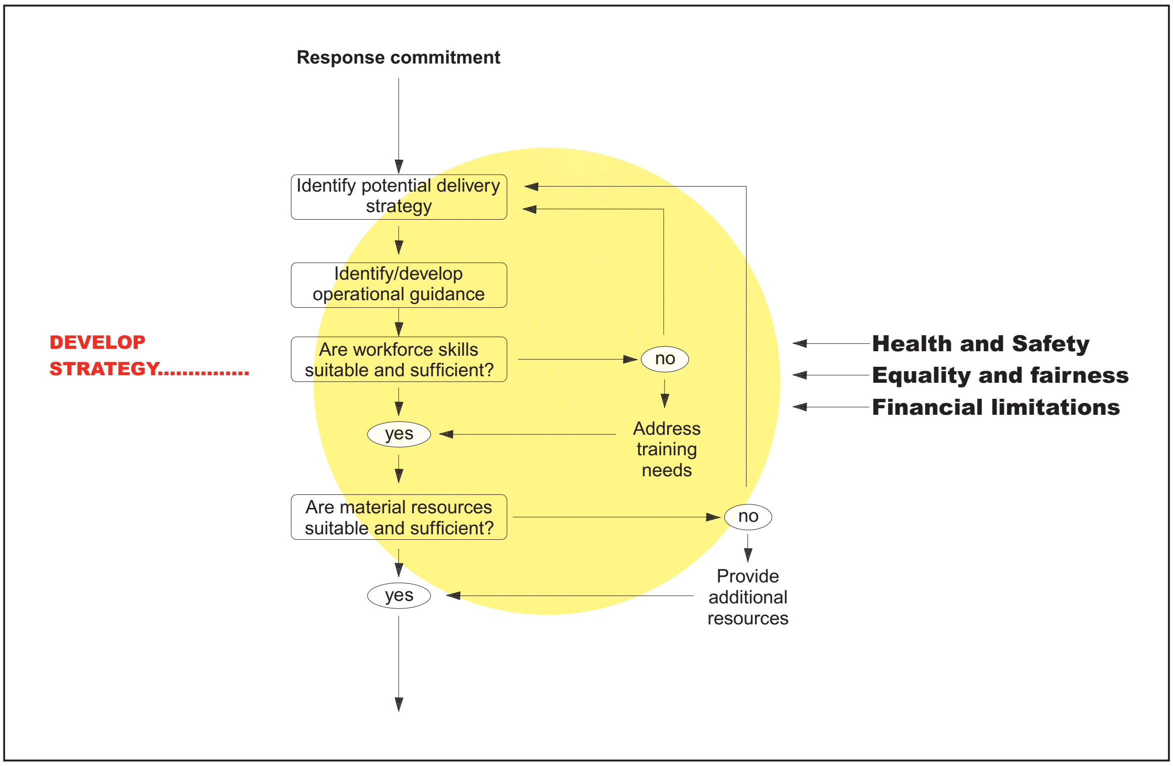


Figure 9. Detail of strategy development

3.8 Integrating prevention, protection and intervention

In the past, one of the greatest strengths of FRSs was that while they delivered fire prevention and protection advice as well as intervention services, skills in all three areas were reasonably well distributed throughout the organisation. Fire safety inspectors had operational experience and operational staff had a knowledge of building construction and a grounding in fire safety systems.

It is true that FRSs did not always have systems in place to make the most of this strength, but in general:

- Fire safety inspectors could incorporate operational needs into their fire safety advice – especially during building control consultations.
- Operational crews could recognise fire safety infringements when they attended fires.
- Fire safety inspectors could identify issues relevant to operational firefighters when carrying out inspections and could pass that information on to the relevant crews.

- Operational crews could use their knowledge of building construction and fire safety systems to assist in firefighting and to secure their own health and safety.

However, in 2002, Bain's report *The Future of the Fire Service: reducing risk, saving lives The Independent Review of the Fire Service* gave the impression that fire prevention and intervention were two separate entities:

> *"We believe that our proposals for the Fire Service should produce a more efficient and effective Service which focuses on prevention rather than intervention". (para' 12.21).*

This idea was then perpetuated in documents such as national framework documents and in England, Fire and resilience Guidance note 1 with questions such as:

> *"Is the balance between prevention and intervention right?"*

It may well have been unintentional on the part of Bain and others, but in the minds of some, the effect of this emphasis on prevention *or* intervention is to cause them to imagine that prevention strategies can be adopted without any reference to intervention strategies – and vice versa.

- Fire prevention strategies now often involve appointing people directly into "non-uniformed" fire prevention roles. However, such people have no knowledge or experience of operational matters so they cannot easily recognise issues relevant to operational firefighters when they carry out inspections. Their knowledge of fire in buildings is purely theoretical (just like any building control officer), so no value is added by building control consulting with the FRS.
- Operational crews are now often totally divorced from legislative fire safety. Concentrating exclusively on domestic fire prevention, these crews have little knowledge of current fire safety systems and are not kept up to date with developments in building technology. When they do attend fires in non-domestic buildings, their safety and effectiveness are compromised because they cannot assess the degree of safety afforded to them by protection systems, and they cannot assess the degree of risk posed to them by 'innovative' construction methods and modern building materials.

IRMP strategies must recognise the role that fire safety personnel play in managing the risk for operational service personnel as well as the normal occupiers of a building. They must also recognise the contribution that a knowledge of fire safety makes to the effective, efficient and safe intervention at fires.

3.9 Expect the unexpected

Other emergency organisations have limited fields of operation but the fire and rescue service is known as the service of last resort. If a person needs rescuing from a mountain, they will call Mountain Rescue, if a person needs medical help and transport to hospital, they will call the Ambulance Service, but if a person is involved in a humanitarian emergency for which there is no specific response organisation, they will call the Fire & Rescue Service. Whether it is an injured bellringer who needs to be rescued from a church tower, or a dog that is stuck in a sluice gate, the Fire & Rescue Service will be called and they will be expected to adapt their equipment and procedures to develop safe systems of work that will deal with the situation.

Many within the FRS are rightly proud of this reputation. However it inevitably means that FRS personnel will often be called on to attend incidents that were not thought about when the scope of the IRMP was developed, and there are therefore no strategies in place for dealing with them.

This is not the same situation as being called to an incident that has been considered, but for which a do *nothing* strategy has been adopted (See Chapter 3 – 2.1). Consider the following scenarios:

Scenario 1

- Response commitment identified as being in scope.
- Risk identified as relevant.
- Intervention strategy developed.

- Strategy resourced and implemented.

  Responding to a risk dealt with in this manner should lead to a successful outcome using safe systems of work.

Scenario 2

- Response commitment identified as being in scope.
- Risk identified as not significant or intervention strategy identified as being disproportionate.
- Do *nothing* strategy adopted.

  Responding to an incident that has been anticipated but deliberately not prepared for would put personnel at risk, and would expose the FRS to potential litigation.

Scenario 3

- Response commitment not reasonably foreseeable and therefore not identified when developing scope of IRMP.
- No strategy developed.

Responding to an incident that was not considered when developing the scope of the IRMP is understandable as long as training, equipment, procedures and high quality supervision ensure that the risk is dynamically assessed, and the principles of the 'safe person' are adopted.

NOTE: This does not mean that reasonably foreseeable incidents can be ignored when considering the scope of the IRMP in order to 'get around' the need for developing a strategy. "Unprepared intervention" can only be considered for emergency situations that are not reasonably foreseeable. Even then, responding to a situation that has not been prepared for or adapting equipment and procedures in unusual situations may be deemed to be unacceptable by the FBU, the HSE or both.

3.10 Setting performance standards

Broad outcome performance standards are set during the risk assessment stage of the IRMP cycle. However the nature of the fire and rescue industry is that it must have strategies in place to deal with infrequent events.

> For example, the suitability of a strategy to deal with a passenger aircraft fire at an airport cannot be assessed through outcomes because (fortunately) such incidents are rare.

Therefore, once a strategy has been selected for dealing with an infrequent response commitment, it is necessary to identify measurable inputs and outputs that will ensure that the desired outcomes will be delivered if and when the strategy is put into action.

> Continuing with the example of a passenger aircraft fire at an airport, inputs to that risk could be a standard for training requirements, the frequency of familiarisation visits for crews, standards of test and maintenance of equipment and the frequency of joint exercises with airport fire crews and other emergency services.

3.11 Presentation and consultation

3.11.1 Draft plans and consultation

At the end of strategy development, preparation of the IRMP is almost complete. A draft IRMP can be prepared. However, that draft must go out for consultation.

All national guidance documents explain in a similar way how and why consultation should be undertaken.

It is common practice in most consultation exercises to ask a series of specific key questions, rather than simply to publish a draft document, and leave consultees to express views 'at random'. But it is important that the questions asked are of the type that stakeholders have a genuine stake in, and that stakeholders are capable of answering.

Some FRSs set up 'focus groups' to inform consultees about the relevant issues before their opinions are canvassed. Some FRSs are careful to ask different stakeholders different questions, depending on which questions are relevant to their group. There are many other examples of good practice in terms of consultation.

NOTE: The extracts below come from a number of real plans, so they have been paraphrased to prevent their exact origin from being identified.

The following question is not strictly speaking about a strategy to reduce risk to the community, but when read in conjunction with the draft IRMP, it is at least asking the public to express their wishes, and it is highlighting that there are cost implications:

> "*To what extent do you agree that the we should invest in reducing our environmental impact, even if it involves spending more money initially*?".

The quality of other consultation exercises are open to doubt. One FRS's consultation exercise included the following question:

> "*Should we review the equipment carried on pumping appliances*?"

The public have no idea what equipment is carried on pumping appliances in the first place, and they have no idea about its value to the overall risk management process. Will this review reduce risk in some way? How much will it cost?

The greater concern is that consultees are very unlikely to disagree with carrying out a review, but it is likely that approval for a review will be taken as a mandate to *review and revise* the equipment.

If it is really only a review that is intended, then this is not a subject that should go out to general public consultation anyway. The FRS is obliged to reduce risk. One of the ways of doing this is to improve intervention delivery. If there is a possibility of doing this by making changes to equipment on appliances, carry out a review! There is no need to seek public approval. If implementing the findings of the review would mean diverting resources from community safety activity or RTC intervention capability, then ask the public what they think.

Another FRS consultation exercise asked:

> "*Do you think that we should move an appliance from Lubbock to Clintwood East to reduce the risk in the surrounding area*?"

Here, it is almost inevitable that uninformed consultees will agree that an appliance should be moved. Who would not want to *reduce the risk in the surrounding area*? The question is, how much will it cost/save? How much will the risk be reduced by? Will the risk in Lubbock be increased?

On another level, when the results of the consultation come in, are the views of the residents of Lubbock and Clintwood East given the same weight as the views of people who live on the opposite side of the County – but who still pay for the FRS through their taxes?

The Welsh RRP guidance makes specific mention of this issue by distinguishing between (a) wide as possible consultation, and (b) consultation with those who are directly affected by any proposal:

> "*The Welsh Assembly Government would expect FRAs to consult as widely as possible and with those who are directly affected by any proposals being made*".

A similar version of the previous question can also be found in consultation papers. It takes the form:

> "*Do you think that moving an appliance from Lubbock to Clintwood East is likely to reduce the risk in the surrounding area*?".

This is a much better way of wording the question because it is not so leading. But care should be taken when interpreting the responses. If the average member of the public was capable of giving a realistic quantitative answer to this question, there would be no need for competent FRS managers or computer risk management models. The consultation responses to this question should only be seen as an indication of *perceptions* of risk.

The final decision on the siting of the appliance in question must be made by Members of the FRA who must weigh up potentially conflicting messages coming from:

- the professional judgement of FRS managers;
- the outputs of computer models;
- the practitioner's view expressed by the FBU; and
- the public's perception of risk.

3.11.2 Good practice

All national guidance contains lists of *who should be consulted and on what*. In general:

Advice	Example
• Consultation should be about matters directly affecting outcomes, not about matters that are simply managerial good practice.	*"Should we review…?"* Of course the FRS should review, it is a function of good management to review. *"Should we change…?"* That is a question that should go out to consultation.
• Consultation should not contain leading questions.	*"Should we improve…?"* Starting questions in this way is simply playing lip-service to 'consultation'. An overall positive response can be guaranteed.
• Consultees should be informed.	*"Should we replace our TTL with an ALP?"* The man on the Clapham Omnibus does not even understand the acronyms, let alone have the required knowledge to contrast the advantages and disadvantages that different fire appliances have in the arena of community risk management.
• Consultation should be relevant.	It could be argued that everyone has the right to be consulted over everything because public money is involved in every case and every change has implications on other aspects of service. In reality, a more pragmatic approach is required to ensure that responses are primarily from those who are directly affected by proposals.

3.11.3 Presenting plans to stakeholders

A manufacturer of cars might develop a business plan based on consultation through customer focus groups and detailed market analysis. Through this work they would identify the range of vehicles they should manufacture, the accessories that should be available, and the price they should charge. However, even with extensive customer consultation and a fully developed business plan, they would not sell any cars if they failed to advertise their products.

- Consultation is about sampling customers to find out what they want and how much they are prepared to pay for it.
- Business planning is about putting strategic business processes in place to deliver what it is that customers want.
- Advertising is telling as many people as possible what goods or services are actually offered.

Consulting on IRMPs, Annual Plans and strategic management plans, and making them publicly available is not the same as 'telling as many people as possible what goods or services are actually offered' by the FRS. An IRMP is a business plan for an FRS. If a customer entered a car show room and asked for information about the cars available, they would be disappointed and confused if they were presented with the car manufacturer's business plan.

It is true that FRSs are public sector monopoly service providers, and they do not need to advertise in exactly the same way as a manufacturer of cars. None-the-less, there is still an obligation to tell customers what they can expect from their FRS. Prior to the introduction of IRMP, it could easily be argued that this was not the case. Strategic managerial decisions in FRSs were broadly about spending public money to meet standards and obligations that were set nationally. Whatever the public knew or did not know about their local FRSs services made little difference because standards and obligations were not set at local level and they could not be changed at local level. Under IRMP the situation is very different. The strategic managerial decisions of FRSs cover the standards and obligations themselves, as well as the way public money is spent to meet them. This is a significant shift. Under IRMP, FRSs clearly have a responsibility to tell the public:

- The range of services they provide.
- The quality of service they have delivered in the past.
- The quality of service they aspire to in the future.
- The cost of those services.

In the worst case examples, FRSs publish a draft IRMP that contains questions about its content, thus attempting to combine all of the aspects of consultation into a document that is all but finished. The final document then attempts to fulfil all of the informative functions listed above *as well as trying to be a business plan*.

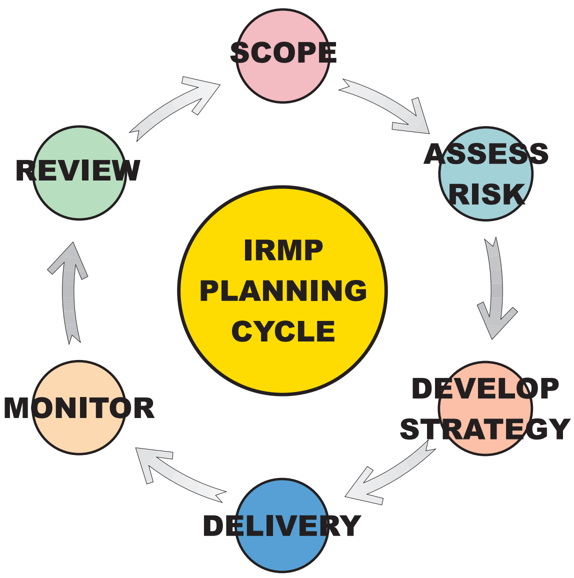
Not all IRMPs follow this format, but in an attempt to be a 'glossy sales brochure' as well as a valuable 'business plan', they frequently fall between two stools and fail to be either.

The aim should be *one job, one document*.

After the end of the consultation over the development of strategy, four categories of document should have been produced:

1. Initial consultation documents about the scope of the IRMP and risk philosophy.
2. Draft IRMPs and associated consultation questionnaires.
3. Final IRMPs and Annual Plans (publicly available but for internal use).
4. 'Glossy brochures' presenting the actual service provided.

Chapter 4 – Delivery



4.1 Consider human factors

Even when delivery strategies are well designed and well developed, there is still a chance that they will not be implemented consistently.

It is often the case that the reason for incorrect implementation is that systems, rules, procedures or instructions are not complied with. There are many reasons why this might occur, but the underlying causes often lie in systems that are designed without taking proper account of human factors [ref. HSG 65].

Whether the response commitment being delivered is a home fire safety visit or intervention at a major fire, delivery mechanisms (including the active monitoring of delivery mechanisms) need to address human factors.

Firefighters and their managers generally want to help others and are prepared to 'go the extra mile' when it is necessary. Firefighters and their managers are inventive and resourceful people who are able to adapt equipment and procedures when they are not exactly right for the job in hand. Normally these are all positive attributes when it comes to service delivery, *but going the extra mile to get the job done or adapting equipment and procedures* can easily stray into health and safety risks and working outside the scope of the FRS. It is also significant to note that FRS personnel frequently work in teams, and team behaviour is well known to be different from the behaviour of individuals.

It may be possible to modify behaviour with a combination of reward and penalty, but in situations of humanitarian crisis, managers who are monitoring behaviour (and are expected to modify it with penalty) experience exactly the same 'human factors' as those they are supervising.

By far the best effect can be achieved where employees are actively involved in the development of the delivery mechanisms. FRSs are fortunate in that the majority of their employees are members of a single representative body, the FBU. By involving the FBU in the development of delivery mechanisms, the FRS has the opportunity to draw on the combined experiences of the majority of its workforce and to develop delivery mechanisms that are both safe and practical.

4.2 The next step

Consideration of 'human factors' is the most basic requirement for the safe and effective delivery of services. However there are further steps that can be taken within the IRMP process to improve service at the point of delivery.

According to a *Telegraph* article from July 2008:

> *"Alex Edmans, a finance professor at Wharton business school, has found that companies cited as good places to work consistently outperform the market.*
>
> *In a recent paper on employee satisfaction, he showed that Fortune magazine's 100 best companies to work for in America earned a 14 per cent annual return for investors between 1998 and 2005, compared with 6 per cent for the overall market".*

Unfortunately, while there may well be measurable benefits from actively putting in place measures to make employees 'happy at work', such a practice would be seen as a radical step by many UK businesses, especially by those in the public sector.

However, the effect of employee satisfaction on the delivery of IRMP strategies should still be taken into account when considering the implementation of staffing policies and procedures such as leave arrangements and hours of work.

An FRS is a labour intensive service industry where the quality of service delivery depends very much on the degree of employee engagement. If staffing policies and procedures are introduced that de-motivate and demoralise employees, service delivery is likely to be adequate at best. The most carefully planned delivery strategies will struggle to deliver the desired outcomes under such circumstances. Imposing more and more controls on staff to try to improve delivery is only likely to further de-motivate and demoralise, and thus exacerbate the situation.

Employees who feel valued and are satisfied with their working conditions and the way they are treated by their employers, are more likely to implement delivery strategies with enthusiasm and commitment.

Simply paying an employee a reasonable wage only buys their labour for the contracted period of time, it does not buy their enthusiasm and commitment.

The whole IRMP process pivots on 'delivery'. One half of the IRMP process is about planning delivery, the other half is about measuring delivery, but no matter how much work goes into planning and measuring, an FRS will not achieve its objectives without effective delivery.

In a manufacturing industry, effective delivery is often heavily dependent on the quality of raw materials and machine tools. In the transport industry, effective delivery can be heavily dependent on the quality of the transport infrastructure and vehicles. But in a labour intensive service industry like an FRS, effective delivery relies almost totally on employees. Therefore, staffing policies cannot be looked at in isolation. They must be assessed under the umbrella of IRMP in terms of their impact on motivation and morale. Policies that have an adverse effect on motivation and morale are likely to have an adverse effect on service delivery and consequently on the outcomes of the IRMP.

The adoption of policies that value and respect staff, such as genuine family friendly policies, will have positive effects that will filter through to better service delivery.

On the other hand, adopting a policy to remove cooking facilities from fire stations (for example) sends a message to employees that the FRS does not even value them enough to allow them to eat hot food during the working day.

Expecting those same staff to then willingly strive to achieve challenging targets set by the FRS in the IRMP is somewhat unrealistic.

Any policy that has an impact on staff can fall into the scope of an IRMP under the headings of *legislative compliance* at their most basic level, but the more enlightened view would also consider *social* and *corporate responsibilities* and *stakeholder's expectations*.

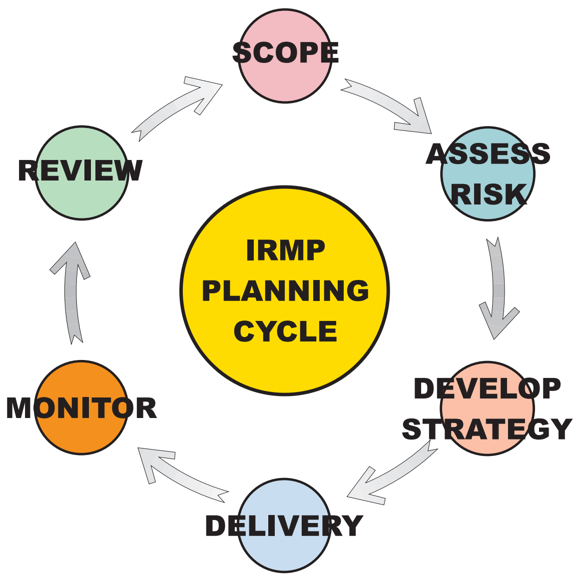
4.3 Trade union facilities

Legislation and regulation controls *minimum* levels of statutory consultation with employees, but employees are unlikely to be engaged and motivated by an employer who just meets the legal minimum requirement.

Once again it is worth emphasising that the majority of FRS employees are members of a single representative body, the FBU. By involving the FBU in the development of staffing policies, and by addressing any concerns that are raised by the FBU, an FRS is most likely to ensure that its most valuable asset (its employees) are 'happy' to deliver strategies and to achieve challenging outcomes.

> Allowing employees to work as full time FBU officials should be seen as a key strategy for achieving effective and efficient service delivery.

Chapter 5 – Monitor



5.1 The extent of monitoring

In previous chapters, emphasis is placed on the development of outcome performance measures at the risk assessment stage of the IRMP cycle, and the development of output and input performance measures at the strategy development stage. However, monitoring an IRMP is not just about the collection of evidence following delivery.

Monitoring and review do not just feed back to the start of the IRMP in a simple cyclical motion. They constantly feed into every stage of the process.

It is almost better to imagine monitoring and review as running in parallel with the IRMP planning cycle.

In Chapter 1, it was explained that aspects of the scope of an IRMP range from local policies through response commitments to stakeholder's expectations. Few of the aspects of scope will remain static from one year to the next. New legislation can require the FRS to undertake new activities or to change the way current activities are carried out. Global warming has already moved flooding up the FRS agenda, is it possible that '100 year gales' will occur with greater frequency? A multiple fatality fire might move the fire safety of a particular building type into sharper focus.

The Welsh RRP guidance puts it this way:

> "*The environment within which the* FRAs *operate will require monitoring to ensure the* RRP *remains valid and current*".

The point is that the FRS should be continuously monitoring its environment in order to make sure that the scope of its IRMP is still reflective of the environment in which it operates.

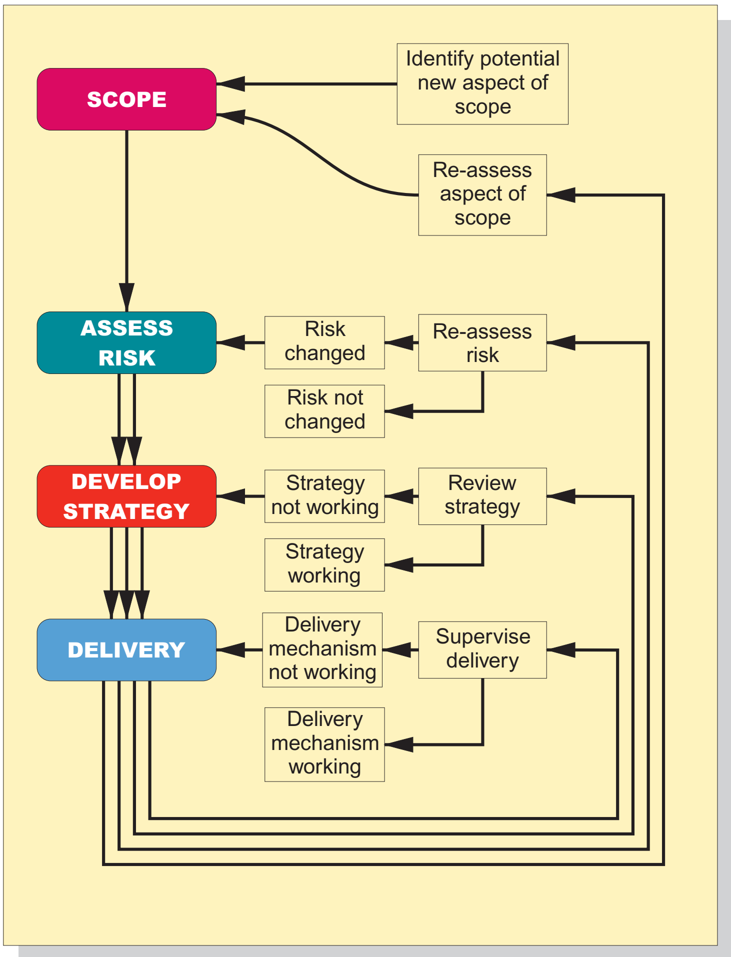


Figure 10: IRMP Monitoring and Review process

In Chapters 2 and 3 it is explained that the outcomes of certain strategies cannot be measured except over long periods of time. The outcome of a strategy for reducing fire death may not be measurable until five years after its introduction. Therefore, the inputs and outputs of the delivery mechanism must be monitored to ensure that the strategy is *likely* to deliver the outcomes.

If monitoring reveals that the required performance standard is not being achieved, it may be that a different strategy needs to be considered.

Alternatively, the strategy may be fine, but the delivery mechanism may not be functioning as intended.

Taking all of the above into consideration, it is clear that monitoring of an IRMP is not just an examination of outcomes that simply feeds into a cyclical review of the whole IRMP process. Rather, monitoring is a continuous process that operates at every level from the broad scope of the IRMP right down to the detail of delivery mechanisms.

Figure 10 shows the more complex view of how the monitoring and review process fits into the IRMP cycle.

It is worthy of note that the HSE's document HSG65 *Successful Health and Safety Management* uses a flow chart that is very similar in appearance to Figure 10 to illustrate the function of *reviewing performance* in the health and safety management process.

5.1.1 Incident investigation

In the medium and long term, monitoring performance by comparing numerical indicators against pre-set standards is essential. In the short term, it should be recognised that emergency incidents also represent an opportunity to monitor the effectiveness of a wide range of strategies.

Fire investigation can be within the scope of an IRMP in its own right. All FRSs have a responsibility to complete fire incident report forms, to report certain incidents to the police, to work with forensic investigators to determine the cause of fires, and to report to the coroner's court in the case of fatal fires. FRSs also have a responsibility to report fires of special interest.

Fire investigation for these purposes is mandatory and therefore "core business" that needs to be managed by a delivery strategy that is properly resourced and equipped to ensure that suitable reports are produced and that the health and safety of investigators is maintained.

However, these mandatory roles only require fires to be investigated, and even then their scope is frequently limited to cause and effect. I*ncident investigation* should go much further than *fire investigation*.

FRSs now have a legal responsibility to attend road traffic incidents but how often are road traffic incidents investigated from the FRS perspective? If they are investigated by the Police, does the FRS obtain copies of those investigation reports in order to support its own mandatory role?

The damage caused by a fire is affected by the attendance time of appliances, but are incidents investigated to assess the effect of attendance strategies? Proper implementation of new fire safety legislation should stop fires from starting in commercial buildings in the first place, but are fires in commercial buildings used as an opportunity to investigate the effectiveness of legislative enforcement strategies?

An enormous amount of added value can be attached to an incident investigation if it is used to gather information that can be quickly fed back into the IRMP review process.

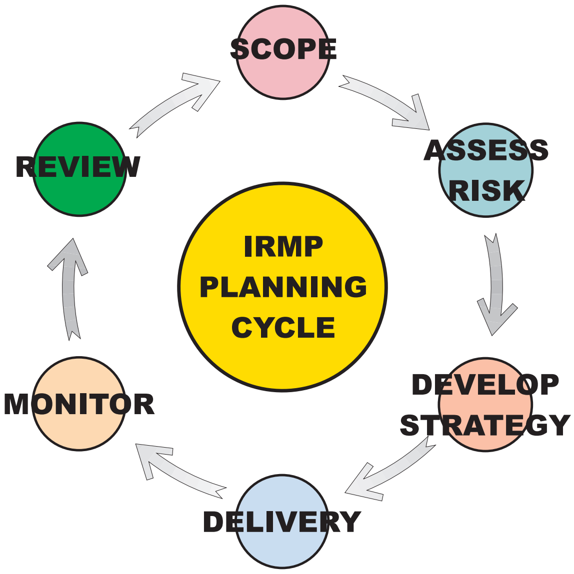
To achieve this objective, incident investigation must go much further than simple 'fire investigation'. It must examine such things as:

- The immediate cause of the incident.
- The underlying cause of the incident.
- The reason/s for escalation of the incident.
- The harm caused by the incident (was it in line with the IRMP assessment of risk?).
- The suitability of the control strategy.
- The adequacy of systems for gathering tactical information.
- The effectiveness of the legislative enforcement strategy.
- The implementation of the control strategy.
- The effectiveness of the intervention delivery mechanism.
- Compliance with controls such as health and safety and environmental pollution.

When the drive from government is high level working in strategic partnerships with other agencies and the measurement of outcomes experienced by whole communities, it is easy to forget that performance at individual incidents needs to be monitored and fed back into the IRMP process.

Good practice can be found in some FRSs who recognise the importance of performance at the scale of the individual incident by mobilising managers to directly monitor activities at incidents so that delivery mechanisms can be reviewed and refined, even in real time.

Chapter 6 – Review



6.1 Completing the cycle

The HSE's document HSG65 *Successful Health and Safety Management* describes 'review' as follows:

> *"Reviewing is the process of making judgements about the adequacy of performance and taking decisions about the nature and timing of the actions necessary to remedy deficiencies".*

HSG65 is about health and safety management rather than business planning, but the above is as good an explanation of 'review' as any other.

It seems that it should not be worth saying that *the purpose of applying performance management to a business plan is to gather information to be fed back into a review of the business plan so that each successive plan is better than the last*. However, the following are paraphrased extracts from actual FRS annual plans that indicate that in practice, monitoring often does not lead to review and improvement.

NOTE: The extracts could have come from a number of plans, and they have been paraphrased to prevent their exact origin from being identified.

> This statement was made to accompany a chart that showed that the FRS had failed to meet its target to reduce injury in fire:
>
> *"After successful performance in previous years, the number of recorded injuries increased during the last 12 months. One reason for this is an increase in the number of fires. We will continue with our campaign of fire safety education to reduce the number of injuries this year".*

In this example, one year's poor results may not be enough to clearly demonstrate failure, but in terms of strict monitoring and review, the statement is saying that during the last 12 months our strategy failed to achieve its targets, but over the next 12 months we will continue with the same strategy.

The following statement was made to accompany data that showed that the FRS had failed to meet its target to confine fires to their room of origin (See Figure 11):

> *"The percentage of accidental dwelling fires confined to the room of origin decreased from 90% last year to 88% this year. Our target for this year was an increase to 92%. Efforts will be made to improve this year, and appropriate targets have been set."*

In this example, the target set for the following year was less than 92% (the target that was set for the previous year but not met).

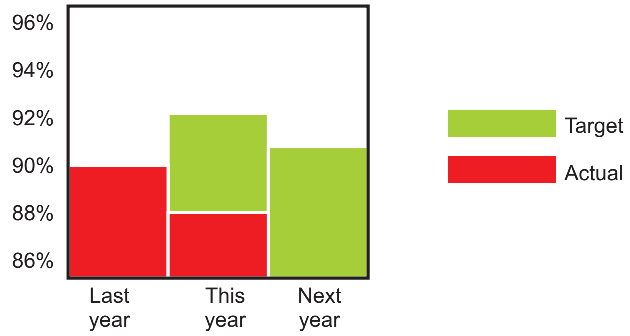


Figure 11. Failure to achieve target results in lower target instead of new strategy

Here, it could be said that following the performance measurement, the FRS reviewed the performance measure and set a more realistic target. However other than 'efforts to improve', no new or improved strategies for containing fires to their room of origin were described anywhere in the document. In fact, the document described proposals to downgrade some fire stations and to close others.

Community fire safety may or may not succeed in reducing the incidence of fire, but once fire does start, it will do little to contain fire to the room of origin.

In another example, an FRS stated in its second IRMP that a "key outcome" of the previous period was that "25,000 *people received fire safety advice*". However according to the previous IRMP, the effectiveness of the community fire safety strategy was to be measured by the "*number of staff hours*" dedicated to it.

In this case, the original intended measure (number of staff hours) was an <u>in</u>put. The measure eventually used in the second IRMP (number receiving fire safety advice) was an <u>out</u>put even though it was described as an "outcome". More importantly, the performance measure changed between one IRMP and the next. If a measure of success is only selected after the event, the validity of the whole process is open to question.

IRMP planning is a cycle. In the simple cyclical diagram that starts each chapter of this document, there is an arrow from the 'monitor' stage to the 'review' stage. It is there for a reason. The outcomes from the monitoring process must feed into the review so that actions are taken to remedy deficiencies. IRMP is not a process with an end, that is simply repeated on a regular basis (See Figure 12).

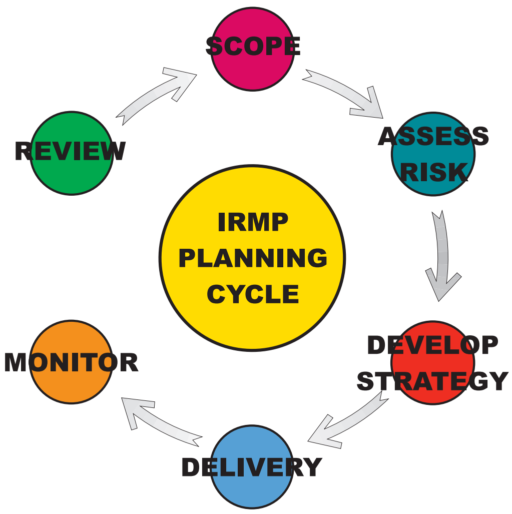


Figure 12: The broken IRMP cycle where past performance is monitored but does not feed back into the development of improved strategies.

Input, output and outcome performance targets should be set as part of the IRMP process. It is essential that at key stages and at the end of the IRMP's life, the performance of the FRS is measured against these same performance targets. Missing a performance target must be seen as being a matter of the utmost seriousness.

There are many examples in early IRMPs where past performance targets are not mentioned in later plans, and where missing a performance target has simply resulted in a lower target being set for the future. But the IRMP is 'owned' by the FRA.

If a performance target is missed, the FRA should closely examine the reason and should provide guidance to the FRS on future action to take. The FRS might advise on setting more achievable targets or selecting a different strategy, but the decision rests with the FRA not the FRS (See Section 7.2).

While re-emphasising that HSG65 is about health and safety management not business planning, it is worth finishing this short chapter on 'review' with another quote:

> *"Feeding information on success and failure back into the system is an essential element in motivating employees to maintain and improve performance. Successful organisations emphasise positive reinforcement and concentrate on encouraging progress on those indicators which demonstrate improvements…".*

But that does not mean glossing over failures, and it does not mean selecting new indicators at the end of a process because the original indicators showed poor performance.

6.2 Role of the Fire Authority/Fire Board

All aspects of performance should be taken equally seriously.

In private industry it is easy to understand that performance in terms of quality should be seen as being equally as important as performance in terms of profit. In theory, quality leads to sales, and sales leads to profit.

It is true that the funding sources of FRSs are widening constantly, but generally speaking, an FRS does not have to make a profit and income is not related to 'sales'. As a result, there is a disconnect between performance in terms of quality and financial performance. A disconnect that does not exist in private industry.

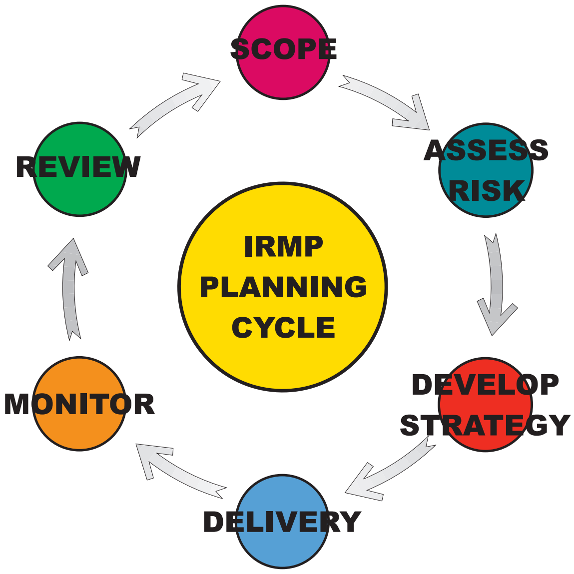
For this reason, it is common for the review of operational performance to be given a lower priority than the review of financial performance by the FRA, and certainly a lower priority than a review of operational performance in well managed commercial enterprise.

Consequently, failing to meet service delivery objectives should lead to a high level critical review of strategies that involves elected members of the fire and rescue authority as well as senior managers. It should, but the examples described in 6.1 above demonstrate that often it doesn't.

Failing to meet service delivery objectives can result in no action at all, it can result in the creation of new measures that look better than the intended ones and it can result in the lowering of standards instead.

- It is the role of the fire and rescue authority to ensure that this does not happen.
- It is the role of the fire and rescue authority to scrutinise the fire and rescue service and its IRMP on behalf of the public.
- It never was the role of the fire and rescue authority to "rubber stamp" every proposal made by FRS managers, and post IRMP, such activity is even less appropriate.

Chapter 7 – Conclusion



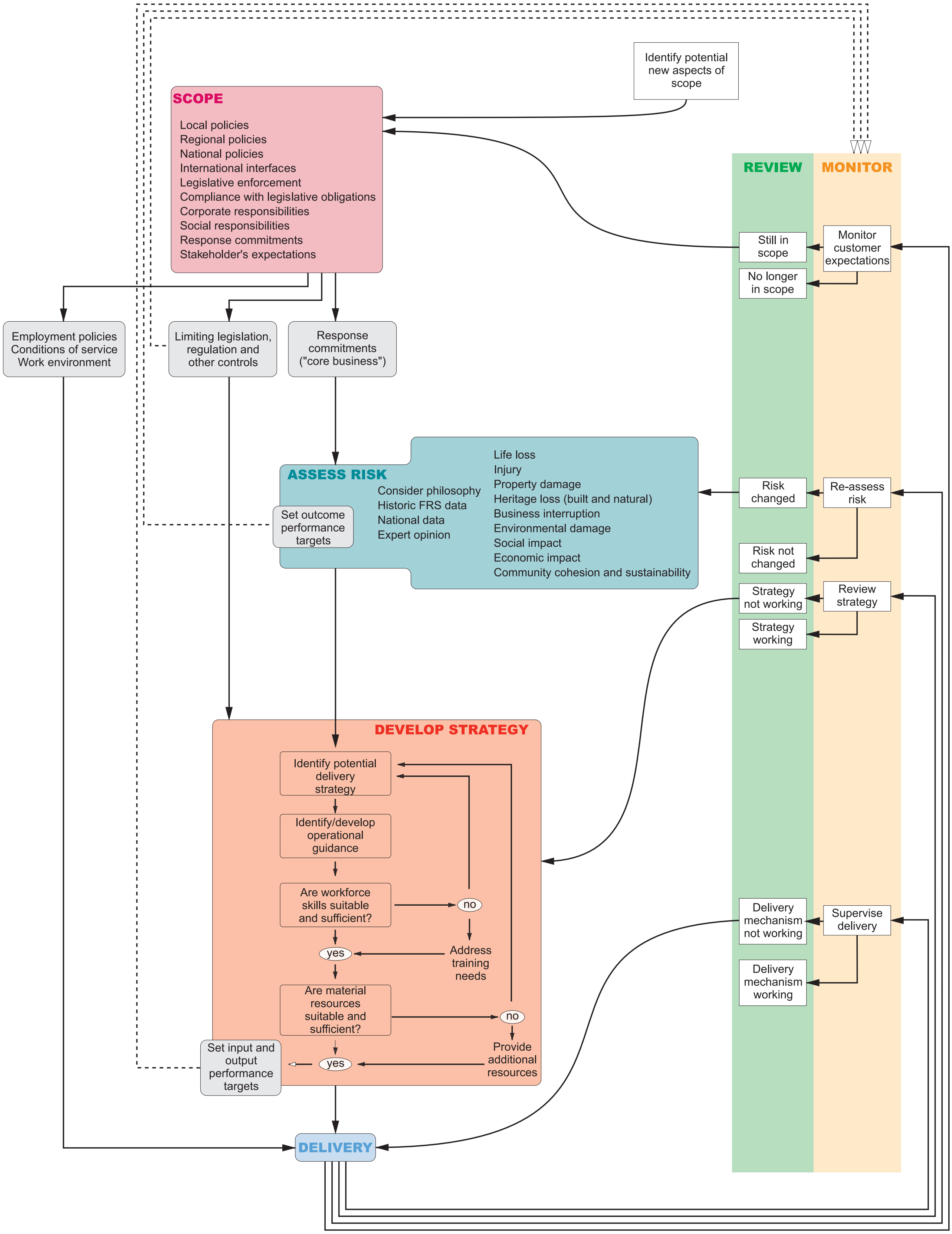


Figure 13: The IRMP framework with key points included

SCOPE

- Identify the objectives you have to deliver
- Identify the objectives you want to deliver.
- Carry out informed consultation with stakeholders.

ASSESS RISK

- Calculate the size of each risk in your scope.
- Agree risk reduction "outcomes" – taking account of the time trouble and effort (including cost) it is reasonable to commit to delivery.
- Carry out informed consultation with stakeholders.

DEVELOP STRATEGY

- Identify ways of delivering the risk reduction outcome.
- Take account of health and safety considerations, financial limitations, equality and fairness and other 'external' limitations on systems of work.
- Take account of the training needs of staff, the material resources and other 'internal' limitations on systems of work.
- Take account of the strategies of neighbouring FRSs and FRSs in your family group. Are your strategies different? Can you robustly defend those differences? Will your strategies mesh well with the strategies of others in the event of working outside your own borders?
- Identify the inputs that are needed to successfully deliver the strategy.
- Identify the outputs of the strategy that should ultimately lead to the desired outcomes.
- Carry out informed consultation with stakeholders – use focus groups and genuine *draft* plans.
- **CONSIDER HOW THE STRATEGY INTEGRATES WITH OTHER STRATEGIES:**
ARE THE RESOURCES REQUIRED PROPORTIONATE TO THE RISK?
DOES IT LEAVE ENOUGH RESOURCES LEFT TO DELIVER OTHER STRATEGIES?
- Select the most suitable delivery strategies.

DELIVERY

- Take account of 'human factors'.
- People are temperamental, difficult to maintain and no two work in the same way. However they are the most important and the most costly resource that an FRS has. They are key to the delivery of every FRS strategy. They should therefore be valued and treated with dignity and respect.

MONITOR

- Monitor what is in scope, and monitor the changing risk environment.
- Measure inputs, outputs and outcomes as appropriate.

REVIEW

- A strategy that is not delivering its desired outcomes must be changed.
- Keeping the strategy but changing the desired outcomes is a very serious step, and should only be made following full and informed consultation with the fire and rescue authority.
- Feedback the findings of your review into the most appropriate part of the planning process.

Figure 14: Summary of the IRMP framework

7.1 Integrating IRMP and business planning

Before IRMP was introduced, the role of the FRS and the standards it had to deliver were laid down in statute and national standards. Central government set performance indicators, central government regularly issued operational and managerial 'guidance' that was 'instruction' in all but name and central government inspected FRSs to ensure that suitable systems were maintained.

Now consider the definition of a business plan at the start of this document:

> "*A business plan is a written document that describes a business, its objectives, its strategies, the market it is in and its financial forecasts. It has many functions, from securing external funding to measuring success within your business*".
>
> "*Once you've drawn up your new business plan and put it into practice, it needs to be continually monitored to make sure the objectives are being achieved. This review process should follow an assessment of your progress to date and an analysis of the most promising ways to develop your business*".

Clearly, before the introduction of IRMP, much of the business planning process and the function of the business plan were not in the hands of individual FRSs. They were provided by central government.

Today, there are no national minimum standards of fire cover; FRSs are free to pursue any activity they see fit that supports a broad National Framework; they set their own performance standards; such guidance as is issued from the centre is explicitly not mandatory; audit of overall performance is carried out externally, but audit of frontline practice is largely carried out by self assessment and peer review.

Today an FRS has no choice but to produce a full and comprehensive business plan but it is not possible for an FRS to produce a *business plan* and an *integrated risk management plan* as two separate documents. The *business* of an FRS is providing *integrated risk management* to the community it serves. Excluding *integrated risk management* from the *business plan* of an FRS would be like a car manufacturer excluding the manufacturing of cars from *its* business plan.

7.2 Performance management and the role of the Fire & Rescue Authority

IRMP is not simply a management process, or a process that has to be managed, it is "*about managing for results*". IRMP has performance management embedded in its every aspect.

However, unlike many organisations, some of the 'business strategies' of an FRS may rarely, if ever, be put into practice – a flood response strategy or a mass decontamination strategy for example. As a result, performance management cannot simply rely on comparing outcomes against objectives, instead, outputs and inputs must also be used as performance measures.

The measurement of outputs and inputs is not fashionable at the moment, but it is inevitable if performance management is to be applied to an emergency service with such a wide remit as the FRS.

It should also be emphasised that *all* aspects of performance should be taken equally seriously. In private industry it is easy to understand that performance in terms of quality should be seen as being equally as important as performance in terms of profit. In theory, quality leads to sales, and sales leads to profit.

It is true that the funding sources of FRSs are widening constantly, but generally speaking, an FRS does not have to make a profit and income is not related to 'sales'. As a result, there is a disconnect between performance in terms of quality and financial performance. A disconnect that does not exist in private industry.

For this reason, it is not uncommon to see an FRS addressing financial management issues at the highest level, involving elected members of the fire and rescue authority, but at the same time failing to meet service quality performance objectives, and then simply tasking middle managers to set lower objectives for the following year – and all without any scrutiny from the fire and rescue authority.

For the IRMP process to work, it is essential that members of the fire and rescue authority imagine themselves to be non executive directors of a private company.

According to the Higgs Report, commissioned by the UK Government and published in 2003[7]:

- Non-executive directors should constructively challenge and contribute to the development of strategy.
- Non-executive directors should scrutinise the performance of management in meeting agreed goals and objectives and monitoring, and where necessary removing, senior management and in succession planning.

Non executive directors should also provide independent views on:

- Resources
- Appointments
- Standards of conduct

Non-executive directors are the custodians of the governance process. They are not involved in the day-to-day running of business but monitor the executive activity and contribute to the development of strategy[8].

If elected members of a fire and rescue authority are not fully familiar with the function and process of IRMP, they cannot fulfil their role as non executive directors of a fire and rescue service.

7.3 Consultation

An FRS is more directly answerable to the public it serves than ever before. The breadth, depth and quality of service it provides must be determined by informed consultation with the public and with key stakeholders.

The majority of members of the public have little or no knowledge about the intricacies of large-scale risk management services or their cost. What this means is that FRSs have a responsibility to inform and educate before they embark on consultation exercises.

Paying a small focus group to spend a day listening to arguments and questioning FRS managers will return meaningful opinions that can be fed into the IRMP process. Distributing leaflets in public buildings with questions on them like "*should we introduce of a new dynamic mobilising system*? YES/NO", is contrary to all government guidance on public consultation and at best it is a process that will not produce results that stand up to scrutiny. At worst it is a process that takes advantage of the public's lack of knowledge to effectively exclude them from the process.

7.4 The process

The FBU firmly believes in and supports the process of IRMP as described in all of the current national guidance documents. The FBU wants to work with fire and rescue authorities, FRSs and governments to implement and to further develop the IRMP process.

Where the FBU has in the past come into conflict with others over the content of IRMPs, it has almost always been the case that if national guidance documents had been followed in full, either the contentious content of the IRMP would never have been included, or the conflict could have been resolved more quickly.

[7] *Review of the role and effectiveness of non-executive directors*: **Derek Higgs: January 2003**

[8] wikipedia.org

7.4.1 This document as part of the process

To produce a universally applicable document that presents a full detailed explanation of the IRMP process would neither be desirable nor possible. Such a document would have to describe a business planning and performance management process that could be applied to every UK FRS.

Instead of producing such a comprehensive document, the FBU has therefore produced this document, illustrated by examples, summarised in Figure 13 and Figure 14, to show how locally identified business planning and performance management agendas can be attached onto a common framework.

By using this framework nationally, the ability to manage an FRS based on local need would not be restricted. The ability of FRSs to join together to face cross border challenges would be enhanced. What is more, while it is inevitable that industrial relations will always experience highs and lows, the transparency of the management process provided by this framework should mean that disputes over integrated risk management planning should be few in number and easy to resolve.

Appendix 1

Fire and resilience

Guidance note 1

1 Introduction

1.1 This is the first of a series of Guidance Notes designed to provide advice and assistance to fire authorities and those who are asked to develop Integrated Risk Management Plans (IRMPs). It explains what you need to do to produce an IRMP and what it might contain. The guidance is intended to be neither prescriptive nor exhaustive, and you may wish to develop your own arrangements based around the content of this document.

1.2 The Government thinks that a modern and effective fire and rescue service should serve all sections of our society fairly and equitably by:

a. reducing the number of fires and other emergency incidents occurring;

b. reducing loss of life in fires and accidents;

c. reducing the number and severity of injuries in fires and other emergency incidents;

d. reducing the commercial, economic and social impact of fires and other emergency incidents;

e. safeguarding the environment and heritage (both built and natural), and

f. providing value for money.

1.3 It does not believe this can be done on the basis of the present prescriptive and formulaic national approach to providing fire cover. Instead, the fire service needs a more modern, flexible, and risk-based approach that can deliver improvements in community safety based on locally identified needs. This is the purpose of asking each fire authority to develop an IRMP.

1.4 The Government thinks effective IRMPs will do the following fundamental things:

- identify existing and potential risks to the community within the authority area
- evaluate the effectiveness of current preventative and response arrangements
- identify opportunities for improvement and determine policies and standards for prevention and intervention
- determine resource requirements to meet these policies and standards

1.5 IRMPs are not only about replacing national fire-cover standards with local ones. They involve shifting the focus in planning to put people first, looking at the risks arising from the full range of fires and other emergency incidents, and at the options for their reduction and management. To be effective, IRMPs will need to provide a fully integrated, risk-managed approach to community safety, fire safety inspection and enforcement, and emergency response arrangements that will contribute to a safer environment. In order to provide a fair and equitable service it will be necessary for fire and rescue authorities to take into account in their IRMPs the diverse needs of the population they serve and to assess how best to meet these needs, particularly in relation to community safety provisions. Local authorities already have a duty to prepare strategies and plans for a number of other purposes, e.g. community strategies, Equality Action Plans, etc. IRMPs will need to be co-ordinated with these and the plans of other relevant agencies if they are to have maximum effect.

1.6 IRMPs should be dynamic documents, reviewed and revised regularly as circumstances change and new information becomes available. It may take a number of years to achieve some of the changes identified in them and to meet the targets and objectives. At the same time, they are also likely to identify a number of early actions that can be taken to improve community safety and service delivery. An important underpinning principle, however, is that there must be adequate evidence to support and justify any changes proposed, ensuring the maintenance and improvement in community safety.

2 What fire authorities need to do

2.1 Responsibility for preparing an IRMP rests with the fire authority. Although it may delegate this task to its chief fire officer and his staff (or other appropriate persons), it is strongly recommended that elected Members are fully involved throughout all stages of the process.

2.2 In formulating policies and standards, you will need to think about what information will help you assess whether your objectives and targets are being delivered, whether that information is readily available and who will collect it. Communities and Local Government will examine and disseminate examples of innovation and good practice which lead to high performance, with a view to improving consistency whilst maintaining flexibility.

2.3 IRMPs will be strategic documents, which although reviewed and revised regularly, will essentially remain valid for a number of years. They will need to be accompanied by an annual action plan, linked to your authority's business and financial planning process, which sets out what will be delivered over the coming year and especially what changes are planned. As a number of the possible changes identified in the IRMP will need to be phased over a period of years, Action Plans will need to take this into account. The standards, targets and outcomes should be published in your annual Best Value Performance Plan.

2.4 Consultation with the community you serve and your staff will be an essential element in the preparation of an IRMP. Guidance Note 2 will provide advice on the consultation arrangements the Government expects fire authorities to undertake. This will be the first time local people have been consulted about managing risk in this way. Consultation provides an opportunity to explain how the service has been performing, what opportunities exist for improving community safety, and how any changes will deliver those improvements.

2.5 As some people become aware that fire authorities will be setting locally determined response standards to replace the nationally prescribed fire cover standards, it may initially cause some concern. You will need to explain that this process provides for the first time an opportunity for fire authorities to achieve a real step-change in the provision of community safety activities to meet locally determined needs. You will need to be able to show that the intention of the policies and standards you propose to introduce will have a net effect of improving community safety.

2.6 In order to be ready for the withdrawal of the national recommended standards of fire cover, you will need to start consultation on the draft IRMP by the beginning of November 2003. If you can do so earlier this will be better. Sufficient time will need to be allowed for considered responses from all groups with an interest. Cabinet Office guidelines and good practice suggest a minimum period of twelve weeks should be allowed for written consultation, which is therefore likely to be completed before the end of February 2004. In any event, you should agree a plan for the consultation well ahead of starting. Advice on the consultation process will be issued in Guidance Note 2.

2.7 Communities and Local Government should also be consulted on the draft IRMP. As it will be making specialist teams available to offer training, advice, assistance and guidance to authorities and their fire brigades during the preparation of the IRMP, this will provide opportunities for comment throughout the development phase.

2.8 You will need to set up arrangements for monitoring and auditing your performance to help you review the effectiveness of your policies and procedures. This will enable you to consider remedial action during the year to ensure delivery of objectives, and it will help you when it comes to reviewing the IRMP and preparing your Action Plan for the following year. You will need to ensure your monitoring and audit arrangements are robust, transparent and able to stand scrutiny.

2.9 As the Government wishes to continue to monitor the performance of fire authorities and their fire brigades in reducing incidents, fire-related deaths and injuries, and other aspects of service delivery related to community safety, national performance measures are to be developed to reflect the change in approach. Improvements in community safety outcomes will be the key measures of good performance and success. Guidance on this will be given at a later date.

2.10 Communities and Local Government will need to be fully aware of each authority's aims, objectives, standards and targets in order that performance can be assessed. You will be asked to send a copy of your final agreed IRMP and annual Action Plan to Communities and Local Government and the external auditor.

2.11 The following table summarises the steps you will need to take and suggests some milestones that will allow you to meet the target to produce an IRMP by 31 March 2004. Agreeing your own specific timetable is one of the first things you will need to do:

Agree an overall timetable and milestones, and commission work on a draft IRMP.	By beginning of June, although preliminary planning should commence earlier.
Produce agreed draft IRMP and Action Plan for consultation.	By end of October, but earlier if possible.
Consultation with the community, staff and Communities and Local Government.	November to February, but earlier if possible.
Consider what reporting, monitoring and auditing arrangements will be needed.	October and November.
Fire authority to formally consider the outcome of consultation, commission any revisions, and formally adopt the IRMP and Action Plan.	By end of March.

3 What should be in an Integrated Risk Management Plan

3.1 Each fire authority will have to decide what to put in its IRMP. This section of the guidance sets out what we consider to be the essential elements. In deciding what should be in your IRMP, you need to bear in mind that:

- all the elements described below are important and inter-related, and the IRMP needs to cover all of them. It will probably help your decision-making to have a broad overview rather than a lot of detail about a few aspects. Try not to get bogged down in data or detail at first
- the IRMP must contain enough material to back up the proposed policies and standards so that when you go out to consultation, it makes sense to those who read it, and it is convincing
- although these will be the first IRMPs, you are not starting from a blank sheet of paper. In fact, much of the IRMP will be drafted around the current arrangements and ways of making improvements

3.2 The rest of this section and the more detailed material in the Appendix to this document explains the purpose of each element of the IRMP, what inputs might be needed, and what outcomes you should be looking for from each part of the process. The chart on the next page summarises the process. Further guidance will be issued as the project develops, and regional seminars/training will be offered to assist authorities and brigades.

3.3 Identify existing and potential risks to the community within the authority area

3.3.1 The first task in preparing an IRMP is to identify, characterise and prioritise the existing and potential risks within your fire authority's area. You will need to look in some detail at what has happened in recent years, and what might reasonably be expected to happen. This will include examining the number, type, geographical location and time of day of all incidents attended in recent years (fires, RTAs, other special services e.g. flooding, co-responder, etc). While risk to property, the environment and heritage will continue to be of importance, risk to life will in future be given the highest priority.

3.3.2 The Appendix suggests a wide range of data types and sources you might look at. Fire authorities and their brigades already hold a lot of this information. You will need to consider the extent to which you can rely on existing information gathered for 1(i)(d), fire safety, and other purposes, and whether you need to visit any individual premises to gather additional or more specific information. The Community Fire Safety Toolbox 'Foundation Stones' offers detailed advice on the collection and analysis of information (see section on 'fire facts and statistics' in the Toolbox). The Toolbox web site can be found at www.firesafetytoolbox.org.uk

3.3.3 Fire brigades that have taken part in the 'Pathfinder' trials in recent years will have more detailed information available for part or all of their areas than many others. However, we believe that every fire authority could make a sound start on its local risk identification by:

- assembling the data they have as simply as possible;
- consulting other local authority and public service departments about relevant data they hold, e.g. on the characteristics of housing or commercial areas, on population movements during the day or at weekends, etc; and
- consulting their staff about the information they have on the nature and causes of incidents.

3.3.4 You should be aiming to produce plans, maps, summaries or tables that show actual incidents and identifies areas, time periods, community groups, etc in terms of their relative risks. This may include risks that have not previously been considered. You may also identify in this part of the process data that it would be helpful to collect or improve, or research you would like to do into correlation between incidents and possible causal factors. These needs could feed into the first Action Plan so that work is undertaken over the year to fill the gaps.

3.4 Evaluate the effectiveness of current preventative and response arrangements

3.4.1 Before the fire authority can determine the policies and standards it wishes to apply, it is necessary to examine what it currently does, what it achieves, and how its performance compares with that of others in the light of the 'risk map' identified above.

3.4.2 The Appendix suggests a range of specific questions to consider to help you evaluate:

- the authority's performance in preventing emergency incidents and deaths and injuries; and
- how effective its emergency response was in saving life and property.

3.4.3 This will identify strengths and weaknesses in current prevention, response, and resource allocation. The first key consideration is how well the present distribution of resources match the pattern of risks already identified. This will allow opportunities for improvement to be identified by comparing performance with what might be judged to be achievable given the circumstances in the area. Trends and comparisons, both nationally and with other brigades having similar characteristics, will provide an effective means of doing this.

3.4.4 Given the way the current risk assessment categories are defined and the way the national recommended standards of fire cover work, you may find that some aspects of current response arrangements are not the optimum for the risks identified. In evaluating risk to life, you will take into account where the priorities lie. For example the risk to life from fires is highest in residential premises, especially higher density, lower quality housing, while there is a lower risk of injury or death from fire in commercial premises, reflecting the massive investment in in-built detection, suppression and public protection measures. You will need to make adequate arrangements to ensure your plans are based on knowledge rather than assumptions.

3.4.5 Essential questions to answer, and which are addressed in the Appendix, are:

a. what might we have done differently;

b. did we get the balance right between prevention and intervention; and

c. has more time and resource been spent in non-productive activities (people shut in lifts, false alarms, etc) than on those that might have greater benefits?

3.4.6 At the end of this part of the process, you should have an idea of where and how effective work is currently being done (lives saved, properties protected), and what is less effective (attendance at incidents where nothing was achieved, and where lives could not be saved by intervention). You need to identify what might have been done differently.

3.5 Identify opportunities for improvement and determine policies and standards for prevention and intervention

3.5.1 The first step is to identify the opportunities for improvement in community safety (whether fire or other risks) using preventative measures, and considering how they could be delivered. The primary focus in the fire service has historically been on intervention, although many authorities and brigades have now realised the importance of changing their priority from intervention to prevention.

3.5.2 The principal aim is, of course, to reduce the number of fires and other emergency incidents that occur, and thereby the resultant deaths and injuries, and to protect the built and natural environment. You should set challenging, but realistically achievable goals for each of these aspects, and achievable timescales. As a minimum, these should be consistent with national targets, and where possible will aspire to even greater improvements. Your policies will be expected to reflect this aim, and to contain objectives and standards for achievement.

3.5.3 The National Community Fire Safety Centre already provides advice, guidance and support to fire authorities in the development of their own policies and practices to promote community fire safety. Each authority has already produced a CFS Strategy to give focus to this work, and these can form a useful basis for identifying opportunities for improvement in prevention activities.

3.5.4 As indicated in earlier paragraphs, IRMPs should relate to all incidents to which fire brigades may respond, and preventative activities should do likewise. While fire authorities have responsibilities for reducing the incidence of fires, other non-fire incidents may fall within the remit of other agencies. This does not mean that you do not have a significant part to play in prevention, and your IRMP will need to identify the ways in which you can work in collaboration with the relevant agencies to deliver the wider aspects of improved public safety.

3.5.5 Reaching final decisions about potential for change is likely to be an iterative process. If the fire authority wishes to make an improvement in any one area, it may require a shift of resources. There will usually be a number of ways of achieving this, each with its own implications. That is why we suggest separating options for improvement, policies and standards, so that authorities can take decisions one step at a time.

3.5.6 The policies needed to deliver some improvements could relate to the terms and conditions on which staff are employed as well as to operational matters. How those could be brought into effect is outside the ambit of this guidance. Even if it is currently unclear how or when these could be effected, it is still important to identify them where they are an essential component of delivering improvements to the community.

3.5.7 Fire authorities will be required to set their own standards for both prevention and intervention purposes, following consultation with the communities they serve. You will need to express these standards in terms that are easily understood and will allow performance against them to be measured. The current national guidance on recommended standards of fire cover will be withdrawn at an appropriate time when authorities have completed their IRMPs and are ready for implementation.

3.5.8 Before deciding on the emergency response standards to be set, you will first need to consider whether there are any categories of calls, or circumstances, in which an attendance would be deemed to be inappropriate. Examples are given in the Appendix.

3.5.9 In setting response standards for those incidents the authority has decided to attend, you will need to identify the attendance times to be met and the resources to be deployed, the net effect of any change being improved community safety. You may wish to set different standards for fires and for other emergency incidents. Because of the geographical variation in risks, it is expected that emergency response standards will vary throughout the authority area and be proportionate to the risks. They should not be constrained by artificial boundaries (such as existing fire station areas).

3.5.10 You will also need to compare the resource implications that will flow from the prevention and intervention standards you are considering setting, with the potential benefits that might be achieved by improved community safety. This will be a matter of some consequence to consultees when the draft IRMP is published for comment.

3.5.11 Some policies and standards will be dependent on the contribution of other agencies. IRMPs should set out clearly what will be needed from joint working arrangements with other statutory and non-statutory partners (police and ambulance services, local authorities, utilities, Environment Agency, transport services, etc) in the prevention of both fire and non-fire incidents, and in emergency response. The Health and Safety Executive also has important and long established responsibilities for enforcement of the Health and Safety at Work etc Act and related provisions, which place duties on employers to ensure (through a risk-based process) the safety of employees and the public, including measures to prevent, control and mitigate the consequences of fires.

3.5.12 The outcomes from this phase in the production of an IRMP should be a clear statement of the authority's goals for improved community safety, the areas identified for improvement, the policies designed to deliver those goals and improvements; and the standards set for prevention and intervention. Anyone reading the IRMP should be able to see how the policies and standards will contribute to the goals.

3.6 Determine resource requirements to meet these policies and standards

3.6.1 The last step is to consider the resources you will need to deliver your goals, policies and standards. For example, the properties currently used to house appliances and crews, i.e. the fire stations, do not in themselves contribute to the emergency response provision, and generally only provide domestic and administrative bases. Fire authorities may wish to consider using other opportunities to meet these needs, particularly in view of the greater flexibility likely to be adopted in some areas where the level of risk changes at different times of the day and night and a more dynamic response is required. The provision of fire stations in every locality to accommodate appliances that may only be in the area for a few hours would clearly be wasteful.

3.6.2 You should only make changes where it is clear that the overall net effect will be to improve community safety. It must be recognised that where it is found to be necessary to redeploy resources to areas of greater identified need, it may not be possible to justify the current level of service for some communities, and you may need to consider whether any additional prevention activities might be desirable. Of course, you are starting from the existing position and not a blank sheet of paper. So initial discussions may revolve around which resources should be redeployed and how, rather than considering a wholly new disposition. You may also wish to consider whether some special services might be provided on a re-chargeable basis.

3.6.3 When considering resource requirements, you will need to take into account the potential workload of appliances in each area, and the arrangements for inter-brigade operational support to deal with the changing levels of demand, major incidents, New Dimension preparation, and the provision of special appliances and equipment, etc.

3.6.4 An important consideration throughout all stages of producing an IRMP is the maintenance of safe systems of work for firefighter safety. All existing statute, regulation, and guidance relating to health and safety matters remain extant, and should be complied with. This will include central guidance issued on operational matters, the Integrated Personal Development System, provision of protective clothing and equipment, etc.

3.6.5 The outcome of this process will be an IRMP for all the authority's resources - staff, buildings, equipment - showing how they are allocated between different types of work, different working hours (given that much preventive work needs to take place during other people's working hours), and different locations.

Appendix [to Guidance Note 1]

This appendix provides some more detailed suggestions about questions to ask and issues to consider at each stage of developing IRMPs. It is organised in sections to correspond to the main guidance. The list is not intended to be exhaustive, but is indicative in order to promote consideration of local issues based upon what has happened in the recent past, and what might possibly occur in the future.

A.1 Identify existing and potential risks to the community within the fire authority area

A.1.1 Evaluating risks to local communities will mean bringing together various data sets in a user-friendly way. This could be as simple as maps with overlays or as sophisticated as GIS systems. Detailed guidance to assist in this analysis can be found in the Community Fire Safety Toolbox 'Foundation Stones'. Fire brigades already hold a great deal of this information, but reference can also be made to many local and national sources. Obvious questions to consider are the following:

How many incidents have we attended, and of what type?

- number, type, time and geographical location of all incidents reported (fire and non-fire)
- fires, non-fire incidents and false alarms attended, as a proportion of all calls
- types of incidents attended (urban/rural/land fires, coastal incidents/RTAs/ chemical spillage/persons shut in lifts, etc)
- specialist responses made, e.g. co-responder, (cross referenced to fatalities and injuries)

How serious were they?

- numbers of appliances, equipment and people mobilised to, and used at, incidents
- number of incidents to which aerial and other special appliances were mobilised, the number at which they were used, and for what purposes
- number, type and location of incidents attended where no action was taken
- number of 'supporting movements' made, where from/to, and whether there is a pattern
- number of incidents each flexible-duty officer attended, and the time of day/day of week

What do we know about causes?

- patterns in the causes of fires and other incidents attended
- factors contributing to the cause of incidents, e.g. drugs, drink

What do we know about fatalities and casualties?

- number, time and geographic location of fatal and non-fatal casualties
- rate of fatal and non-fatal casualties, per 1,000 population
- number, time and geographic location of brigade rescues from (a) fires, (b) non-fires
- number, time and geographic location of self-rescues

A.1.2 There is clear evidence nationally to link the occurrence of fires and other emergency incidents with socio-economic patterns. Local patterns will become clear when the activity data referred to above is compared with the local demographic picture. This should provide clear evidence of those sectors of the community most at risk, and inform the process to achieve improvement.

What do we know about community related factors that might affect risk?

- the age range of the population in the area under consideration, e.g. preponderance of elderly or very young people, etc
- the nature of the community, e.g. family units, single parent families, students, etc
- the nature, type and tenure of housing, e.g. houses/apartments/bedsits, rented or owned, etc
- employment patterns, e.g. unemployment levels, population movement patterns by time of day/day of week, etc
- social mix, including ethnicity
- health issues, e.g. sickness levels in the community and care arrangements
- socio-economic factors and deprivation
- occupancy of commercial and industrial premises,
- transport infrastructure

What do national trends tell us about what we might expect?

- rates of fires and other incidents per head of population
- rates of fires and other incidents for more vulnerable groups
- deaths and injuries per head of population
- deaths and injuries for more vulnerable groups

Note: Relevant supporting data at both local authority and ward level (including indices of deprivation) is available through National Statistics Online at www.neighbourhood.statistics.gov.uk

A.2 Evaluate the effectiveness of current prevention measures and response arrangements

A.2.1 Having produced the picture of existing risks/vulnerable communities, you now need to consider how well the current arrangements work in protecting the community and making it safer. Fire brigades already undertake some monitoring of the effectiveness of the services they provide although this process now needs to become more robust. In particular, you need to consider your effectiveness against what could be achieved in the circumstances. Given the limitations of the current approach to risk categorisation and the national recommended standards of fire cover, you may conclude that in some areas the current response arrangements could be bettered. Moving from nationally prescribed standards to locally set standards provides a unique opportunity for tackling local priorities but it also requires more judgement to be used to review whether a better outcome could have been achieved if things had been done differently. In particular, you will need to take a view about whether a better outcome could have been achieved through a different balance between prevention and intervention.

Prevention

- How does your performance in reducing deaths and injuries in all types of incidents compare with other authorities, and how well are you doing year-on-year?
- To what extent could more lives have been saved by improved community safety initiatives?

- Are resources currently targeted at those sections of the community judged to be most vulnerable?
- How effective is prevention work, and what is being achieved?
- Are your partnerships with other agencies delivering the objectives sought?
- What is the level of smoke detector ownership in dwellings, what proportion of dwellings involved in fires had smoke detectors fitted, and how many had a smoke detector that failed to operate?
- How many fires occurred in premises where fire precautionary measures were found to be unsatisfactory and/or contributed to the fire, why and where?
- Is there any evidence that past improvement notices and enforcement action has reduced fires or deaths/injuries?

Responding to fires and other incidents

- Are resources currently deployed in the correct locations to meet the risks identified?
- To what extent do you believe that improved response times could have saved more lives?
- Is there a link between failures to meet existing response standards and the deaths and injuries occurring?
- Which of your response policies are only in place because of the requirements of national guidance?
- Which of your response policies are outside of national guidance, and what do these achieve?

Rescuing people (all types of incidents)

- What proportion of calls involved actual or possible risk to life?
- At what proportion of incidents did people rescue themselves?
- At what proportion of incidents were people rescued by (a) the brigade, and (b) other people?
- Are there technical limitations to your ability to rescue people, e.g. availability of equipment or trained staff?

A.3 Identify opportunities for improvement and determine policies and standards for prevention and intervention

A.3.1 Once you have looked at the local risk and the effectiveness of current arrangements, you should consider what opportunities exist to improve community safety.

A.3.2 Guidance from the National Community Fire Safety Centre will help to inform the development of a strategy for moving from intervention to prevention. This includes the development of local partnership opportunities to build capacity and extend brigade outreach, especially in targeting particular risk groups. Local safety initiatives should be co-ordinated with national campaigns to maximise opportunities for increased public awareness and positive action. The Community Fire Safety Toolbox can be an integral part of training, personal and professional development, and the establishment of a permanent 'knowledge network'. Comparable approaches will need to be developed with other agencies to help drive down the risks from non-fire emergencies. Relevant questions and considerations include:

What might we have done differently?

- Look at incidents involving injuries and fatalities and consider whether they could have been prevented by, e.g. better prevention measures in the premises, improved public awareness, better enforcement, earlier identification of the fire/accident, swifter response, different/better equipment, more advanced first aid, etc
- Consider the same for incidents not involving risk to life but with large property losses, loss of heritage buildings, or damage to the environment
- Is there anything we are doing purely because the current national guidance demands it?
- Could we have achieved a better outcome if existing resources had been in different locations, or with different appliances, shift patterns and/or crewing arrangements to match demand?
- If human resources had been redeployed in prevention or intervention functions, could more lives or property have been saved?

Is the balance between prevention and intervention right?

- How does your rate and trend of fires and other incidents, death and injuries, compare with national/regional figures, and what does this tell us about the scope for improvement?
- Does examination of the evidence suggest a greater need to improve prevention or intervention, or both?
- Can you identify any deaths or injuries that could not have been prevented by improved response? What prevention measures could you have taken?
- What information do you have about non-fire incidents such as road traffic accidents that would assist in identifying the need for greater effort in prevention or improved responses?

Questions about prevention

- What current prevention activities might we do differently or better?
- What areas can be immediately identified as offering greatest scope for early improvement?
- Are existing resources appropriately allocated, targeted at identified risks, and available at the appropriate time of the day/day of the week necessary to achieve best effect?
- Is collaboration with other agencies achieving the objectives and is information shared? Is full and effective use made of employees from other agencies, e.g. home helps, district nurses, community wardens, etc?

Questions about intervention

- What does the authority have to do, and what does it wish to do?
- What changes in response policy might result in improvement?
- Should the brigade attend all non-fire emergency calls it receives, or could some be rejected and/or referred to other agencies, e.g. persons shut (rather than trapped) in lifts that have malfunctioned
- Do you have a 'call challenge' policy in fire control to inform judgements about whether to make a response when apparently false calls are received?
- Would prioritising emergency responses to incidents be appropriate, and what would it achieve?
- Could some aspects of the service be provided in a different way, or by other providers?
- Has consultation taken place with neighbouring authorities in respect of emergency response standards to incidents adjacent to authority borders, and to meet the requirements of New Dimension planning?
- Have operational policies and practices been reviewed and revised to address the new local risk management approach?

A.3.3 Each fire authority is required to determine, in consultation with the communities it serves, the policies and standards to be adopted for intervention measures. The emergency response set should be proportionate to the risk.

Setting standards

- What level of attendance and what response times do you consider to be appropriate for each identified area of risk, and for each type of incident to be attended? In which areas are response times likely to be more critical?
- What type of, and how many, vehicles and personnel are required to respond to incidents of differing types and in different locations, e.g.:
- Might a limited response of, say, two persons in a light vehicle be appropriate to investigate an incident in a premise where comprehensive fire protection measures are installed, or
- Where premises are known to have a poor safety record and to be poorly managed, is a higher level of response required until prevention measures manage this risk down?
- Does a cost benefit analysis support the proposed response?
- Will response standards/arrangements need to vary according to the changing patterns of risk at different times of day/days of the week?

A.4 Determine resource requirements to meet these policies and standards

A.4.1 In following this risk management process you will have recognised the need to adopt a flexible and proportionate approach to providing and deploying resources to meet the local standards you have set for preventative action and to provide a dynamic emergency response. In practice, of course, you are not starting with a blank sheet of paper, and you will need to consider carefully how existing policies and resource allocation can best deliver improvements in small stages rather than seeking to implement a 'grand plan'. A 'one size fits all' approach is unlikely to be appropriate.

A.4.2 Below is a list of questions that might be helpful when you are thinking about this step:

What resources do we need?

- What staffing levels will be needed for the level of prevention work proposed, how much of this work can be done by crews based at fire stations, what structure will you need for the teams doing this work, what proportion of them should be uniformed members of the fire service, and on what conditions should they be employed? If this is a significant change from the current situation, will you be able to redeploy staff or will you need to develop or recruit people with different skills?
- What pumping and special appliances will be necessary to meet the authority's standards and the likely requirements:
- Is a traditional, fully crewed multi-functional pumping appliance always necessary?
- Are aerial and other appliances necessary to meet the requirements of the risks?
- Can other fire brigades (private or public) meet any appliance requirements, or must the authority provide them?
- What are the most effective locations for appliances to meet the risk requirements and response standards, taking account of the dynamic nature of the risk? How does this compare with current locations? What premises will you require?
- What additional resource provision/support arrangements are necessary to meet the potential for periods of increased activity, major incidents and natural disasters? Have inter-service and multi-agency plans been established?
- What crewing patterns will best meet the response standards, e.g. wholetime or retained, constant or variable crewing?
- What shift patterns are necessary to meet operational needs and good employment practice?
- What range and quantity of operational equipment is required to meet all reasonable operational needs?
- Has local implementation of the Integrated Personal Development System ensured that staff at all levels are fully competent in their role? Is specialist training and development required to ensure staff have the skills to deliver the IRMP?
- How many officers are necessary to provide effective management of operational incidents, and on what duty system should they be employed?
- Has the authority and its brigade fully implemented the Incident Command Manual without variation?
- Are arrangements in place to ensure operational efficiency, firefighter safety and consistency when working with other brigades at cross-border incidents?

Appendix 2

Fire and resilience

Guidance note 2

Contents:

1 Introduction
2 Why should fire authorities consult?
3 Who should be consulted, and about what?
4 What is the best way to consult?
5 What happens after consultation?

1 Introduction

1.1 The purpose of this Guidance Note is to provide advice to fire authorities on the consultation arrangements the Government expects to be undertaken when developing an Integrated Risk Management Plan (IRMP) for their area and in implementing the outcomes from that process.

1.2 Section 19 (4) of the Fire Services Act 1947, as amended, provides that a fire authority may not close a fire station or reduce the number of fire appliances or firefighting posts without the consent of the Secretary of State. Fire Service Circular 5/1992 offers guidance to fire authorities on the more detailed arrangements to be followed before an application is submitted to the Secretary of State for approval. The Government does not believe that in a modern fire service the Secretary of State should take these decisions. It believes that democratically accountable fire authorities should take them, acting on the professional advice of chief fire officers, and taking account of the views of the local communities.

1.3 The Local Government Bill currently before Parliament therefore seeks to repeal section 19 (4). The repeal will not alter the statutory responsibility of a fire authority under section 1 (1) of the 1947 Act to secure for their area a fire brigade and such equipment as may be necessary to meet efficiently all normal requirements. Nor does it change the requirement on fire authorities to consult under the Best Value provisions of the Local Government Act 1999.

1.4 This Note puts the requirement to consult into the context of the new Fire Authority Integrated Risk Management Planning process (see Guidance Note 1). It brings the earlier guidance up to date, and sets out the Secretary of State's expectation that consultation about each fire authority's arrangements for managing the risks from fire and other non-fire emergency incidents will continue to be undertaken after section 19 (4) is repealed. It also takes into account advice on the principles of managing risks to the public provided by the Government's own Strategy Unit.

1.5 The content of this Note is limited to the specific issues referred to in this section. In making arrangements for consultation, you should take into account the 'best practice' advice issued under cover of Fire Service Circular 2/2001. For information on further guidance that is available on consultation, see paragraphs 4.5 and 4.6. Each fire authority should be open and transparent about its understanding of the risks to the public and about the process it is following in handling them.

2 Why should fire authorities consult?

2.1 Fire authorities have a statutory duty to consult the public in respect of the Best Value requirements embodied in the 1999 Local Government Act. Section 3 of this Act requires fire authorities to consult council tax and business ratepayers, service users and others with an interest, to help decide how to fulfil the duty of securing continuous improvement and to take a broader view of needs and priorities. This will be the means by which fire authorities will routinely inform and consult their communities about how they are meeting the targets and standards set.

2.2 The Fire Services Act 1947 contains no explicit statutory requirement to consult on any proposal to make any variation in the establishment that requires approval under section 19 (4). However, Secretaries of State have long considered it desirable that any such proposal should have been sufficiently widely publicised, in sufficient detail and with adequate time allowed to enable any interested party to make representations.

2.3 Applications to reduce fire cover, for example by closing a fire station, or by reducing the number of firefighting appliances and/or firefighters available, can frequently raise issues of genuine concern among communities and employees. Some people might be prepared to accept a substantive case for reducing fire cover locally in order that resources might be redeployed elsewhere. Others may regard any reduction in cover, even if the current use of the resource is limited, as a challenge to local safety that must be resisted as a matter of principle. Proposals to alter or even increase fire cover, for example by constructing a fire station in a new area, can also attract opposition for other reasons.

2.4 As with all Best Value authorities, fire authorities are expected to collaborate with other public and private sector agencies to improve their efficiency and effectiveness, and in particular, to promote and take part in community safety partnerships extending beyond the traditional 'fire safety' role.

2.5 The Secretary of State considers, therefore, that fire authorities should consult widely as part of the process of preparing their IRMPs because this will help to ensure that Plans draw on the widest possible range of data and views and represent the best possible response to local needs and wishes. Effective consultation can act as a catalyst for greater community participation. If members of the public think they are being listened to they are more likely to make suggestions for improving services or ask for information. Where authorities maintain an ongoing dialogue with communities, local opinion about options for change can be canvassed at an early stage. Consultees presented with a fait accompli are more likely to react negatively to proposals for change.

3 Who should be consulted, and about what?

3.1 The guiding principle in deciding how extensively you consult is that any person or organisation that might have a legitimate interest in the proposals under consideration, or who may be affected by those proposals, should have the opportunity to express their views.

3.2 The scope of the consultation you undertake will be proportionate to the nature and extent of any changes proposed. The public is clearly most interested in those aspects that impinge directly on the service provided to them, and their perception of its impact upon their safety. This will include those instances when proposed changes will improve the service provided as well as when the reverse occurs, e.g. when resources are permanently redeployed from one location to another to meet identified needs. Staffing and related issues are usually of lesser importance to the public, but of course are of great importance to employees and their representatives.

3.3 Section 19 (4) of the Fire Services Act, as amended by section 7 (1) of the Fire Services Act 1959, currently includes a requirement to obtain prior approval from the Secretary of State for closure of a fire station as well as any reduction in appliances and crews. For approval to be given, you have had to be able to demonstrate that adequate consultation has been undertaken and the responses considered.

3.4 Part of the new approach to integrated risk management planning is to improve the availability of appliances and crews in the right place at the right time to meet the identified risk requirements and the response standards set by the fire authority. This may require some appliances to change location at different times of the day and night to meet the dynamic nature of the risks. The use of premises to house appliances and crews providing this modern and more flexible approach to emergency response cover is a matter for determination by the fire authority, taking into account its employment and other obligations. There may be many ways in which it can meet the domestic, catering, and other requirements. For these reasons, you will be expected to consult about any changes in the provision of appliances and crews.

3.5 There are three principal areas on which you will be expected to consult, although local circumstances may suggest consultation on other issues could be beneficial to the authority and/or the communities it serves. The principal areas for consultation are:

Examples of proposals for change	Who should be consulted?
Alteration in the policies/standards set by the fire authority for attendance to specific types of emergency incident	• Communities, business organisations, and local authorities in the area covered by the appliance(s) concerned • Employee representatives
Alteration in the standards and/or targets set for preventative activities to achieve improvement in community safety	• Communities, business organisations, and local authorities in the area covered by the appliance(s) concerned • Employee representatives
Removal from service of pumping and/or special appliances	• Communities, business organisations, and local authorities in the area covered by the appliance(s) concerned • Employee representatives
Permanent relocation of pumping appliances (other) than to meet day-to-day operational requirements and pre-determined movement to meet the changing nature of risk by time of day)	• Communities, business organisations, and local authorities in the area covered by the appliance(s) concerned • Employee representatives
Permanent relocation from one fire station to another of a special appliance providing cover across part or all of the brigade's area	• Employee representatives
Changes in the number of personnel provided to crew appliances	• Employee representatives
Change in crewing patterns of one or more appliances, e.g. shift crewed to day-crewed, constant crewed to variable crewed etc	• The community, business organisations, and local authorities in the area covered by the appliance(s) concerned • Employee representatives

Figure 1

3.5.1 The draft IRMP and initial Action Plan

The IRMP will form the strategic 'blue-print' on which the fire authority will base its decisions about future service provision and how it intends to improve community safety. As a matter of expediency, you will need to consult on the initial Action Plan concurrently with the IRMP. Before final decisions are made on either document, you will be expected to have consulted:

- The general public, council tax payers, households, etc,
- Community organisations, including specific community groups, such as ethnic minority and other often excluded groups,
- Public representatives, e.g. Members of Parliament,
- Business organisations,
- Local authorities, public agencies, and other emergency services,

- Employees (uniformed and non-uniformed) and their representatives,
- The Office of the Deputy Prime Minister,
- Any other interested parties.

3.5.1 The annual Action Plans

You will also be expected to consult on subsequent annual Action Plans if these include any changes in the fire authority's standards and/or provision of resources for intervention services. As the Action Plan is likely to form part of the authority's business planning process for its fire and rescue service, you may find it will achieve the best effect if consultation is co-ordinated. You will need to decide on the extent of consultation dependent upon the issues contained within the Action Plan. The principle set out in paragraph 3.1 above should form the basis for decisions about those who should be consulted. Examples of the sort of situations that might arise, and those you might be expected to consult, are given in Figure 1.

3.5.3 Changes in intervention standards and/or resources not included in an annual Action Plan

Circumstances may arise in which the fire authority might deem it appropriate to amend the policies/standards it has set for prevention and/or intervention activities, or the provision/location of resources, which have not been included in annual Action Plans. You will therefore need to make arrangements to consult those who may be affected by the changes. These issues are likely to be similar in nature to one or more of those listed in Figure 1, and the guidance given there should form the basis for your decisions about the extent of consultations.

4 What is the best way to consult?

4.1 All forms of consultation whether face to face or more remotely managed, require a degree of expertise if you are to obtain as many helpful comments as possible from consultees. Some methods require technical and analytical skills that may not be immediately available within fire authorities, particularly when dealing with more complex or wide ranging issues, e.g. large sample surveys may require an understanding of sampling techniques and quantitative analytical skills. You might also consider whether, for example, in seeking to prevent or minimise the effects of road traffic accidents, consultation would be more effective if done jointly with the police, ambulance service, and/or other relevant local agencies. Many of these other agencies have considerable experience of public consultation that you might find to be of benefit.

4.2 There are many ways in which you can draw your proposals to the attention of the community and other interested parties, and gather views and comments. Whichever methods are selected, it will be important to ensure that sufficient information is made available to consultees to allow them to make informed decisions. This might include:

- Details of the proposed changes in standards and/or resource allocation,
- Why these proposals are being made, including alternative options considered by the authority to achieve improved performance/community safety ,
- How the net effect will improve community safety, and what the local impact will be on consultees,
- Any additional actions planned to be taken to ensure the proposed changes will deliver the improvements expected,
- The timescales in which it is expected that the changes will be implemented and the benefits realised.

4.3 You will be able to select the most appropriate technique for consultation by considering the complexity of the subject matter and its relevance to the people being consulted, and putting this into the local context. The key measure is the effectiveness of the process in gathering views and opinions about the proposals for consideration by the fire authority.

4.4 You may wish to use some or all of the following techniques:

- Advertising/articles in local newspapers
- Leaflets delivered to households
- Letters to other agencies, public/business representatives, MPs, etc
- Fire authority/brigade web site
- Public meetings and meetings of specific community groups
- Focus groups, citizens' juries, etc
- Displays in libraries, public buildings, etc
- Meetings with local authority representatives and other agencies
- Meetings with employees and/or representatives

4.5 Sufficient time should be allowed for considered responses from all groups with an interest. Cabinet Office guidelines (www.cabinet-office.gov.uk/servicefirst/index/consultation.htm) provide useful information on best practice in conducting consultation exercises. This includes the Code of Practice on consultation documents issued by government which suggests that, other than in exceptional circumstances, a minimum period of twelve weeks should be allowed for written consultation. It is recommended that you adopt a similar timescale for consultation on the draft Integrated Risk Management Plan because of its potential scope and complexities. For consultation about subsequent changes in standards and/or provision, you will need to make a judgement about the time to be allowed for consultees to respond, taking account of all relevant factors.

4.6 If there is in any doubt as to the extent of consultation desirable in any case, or the time which should be allowed for consultations, fire authorities may wish to seek the advice of the Office of the Deputy Prime Minister.

5 What happens after consultation?

5.1 At the conclusion of the consultation exercise, all responses received must be evaluated and formally considered by the fire authority before it reaches a final decision about implementing any proposals. The process should be open and transparent with all relevant factors and views taken into account, including perceptions of risks faced and public concerns and values. In due course, you should make available a summary of the responses received, along with your response to the points raised.

Appendix 3

Integrated Risk Management
Fire Authority Development Framework
for Emergency Response and Community Safety in Scotland

1. Introduction

It is the intention of Scottish Ministers that fire authorities will move away from the traditional approach to standards of fire cover which uses centrally set recommended standards based on the potential for property fires, to a flexible, locally determined risk managed approach which is intended to achieve outcomes that improve community safety.

Scottish Fire Service circular number 4/2003 which was issued in April 2003 contains information about the background and rationale for the move towards risk based emergency response in Scotland through the introduction of Integrated Risk Management planning at fire authority level.

The Integrated Risk Management (IRM) approach represents a fundamental service review and requires to be introduced in a careful, considered and planned manner to ensure that any changes that are proposed are fully justified, accompanied by evidence to support the change and carried out in a transparent manner.

The approach in Scotland has been progressing on the basis of consensus and stakeholder consultation and participation. Seminars have already taken place for stakeholders and fire authorities.

This note seeks to assist in the planning for Integrated Risk Management by offering a consistent framework for the IRM approach within Scotland. This framework guidance gives a general overview of the process while allowing scope for local application flexibility. The approach is dynamic and guidance is expected to develop as the process evolves.

2. Philosophy of Risk and Risk Management

Risk may be defined as the chance that an adverse outcome will occur as a result of a particular hazard and event. The level of risk can be expressed as a function of the likelihood of occurrence and also the degree of severity.

The perception of risk varies between individuals and between groups and is based on attitudes, personalities and experience.

Community perceptions influence community expectations.

The risk types relative to emergency response and community safety can be listed as:

- Individual life risk
- Societal life risk
- Property damage
- Environmental damage
- Heritage protection

It is important to manage risk. Risk management in the context of this guidance describes activities concerned with:

- The ability to reduce the incidence and impact of risk.
- Deciding on risk levels considered appropriate.
- The benefits of risk control measures.

3. Concept of Integrated Risk Management (IRM)

The IRM process is about managing risk in a cost efficient and effective way, using fire authority resources flexibly and efficiently to full effect to achieve safer communities.

The move to IRM involves shifting the focus in planning to put people first, looking at the risks arising from the full range of fires and other emergency incidents and at the options for their reduction and management. To be effective a fully integrated risk based approach is required where community safety, fire safety inspection and enforcement and emergency response arrangements all contribute.

The whole process is based on the importance of outputs and results with service delivery related to Community Safety outcomes and where reduction in lives lost, injuries and property damage are important targets.

- The IRM development process should comprise the following 4 stages:
- Identify existing and potential risks to the community within the fire authority area
- Evaluate the effectiveness of current preventative and response arrangements
- Determine policies and standards for preventative and response arrangements and identify opportunities for improvement
- Determine resource requirements to meet these policies and standards.

These stages are considered further later in the document.

4. The IRM Plan

An IRM plan will be the blueprint by means of which fire authorities will make the transition from a property protection fire cover model to a fully integrated model based on life safety. It should be a dynamic document with review and revision occurring as circumstance change and new information becomes available. The plan should contain the authority's own expectations identified in a quantitative way.

It is envisaged that an IRM plan will be a strategic document and will be accompanied by an annual action plan linked to the authority budget and business planning process. The action plan should set out the planned delivery and changes for the following year.

The plan should be compatible with the fire authority delegation, reporting and approval procedures.

In preparing an IRM plan, authorities require to be mindful of the Scottish public policy paper "The Scottish Fire Service of the Future" which was launched on April 30, 2002. It is the Scottish Executive's intention to publish a further consultation paper in 2003, prior to the issue of an intended Fire Services (Scotland) Bill. The prospect of new legislation will not prevent the production of an IRM plan and associated action plan, but it may impinge on the legal, procedural and timescale considerations for implementing some of the features contained within the IRM plan.

Engagement with the workforce and consultation with stakeholders is essential during the preparation of IRM plans. This will provide the opportunity to explain how the service is performing and what opportunities exist for improving community safety.

IRM is part of the larger modernising Local Government agenda and will need to take account of the plans of other relevant agencies if they are to have maximum effect and must embrace the partnership approach of Community Planning, Well Being and Best Value as required to comply with the Local Government in Scotland Act 2003, as well as the reporting requirements in the Act.

IRM should be a dynamic process, reviewed and revised regularly as circumstances change and new information becomes available. It therefore requires internal scrutiny, performance management and systematic planning and decision processes. It may take a number of years to achieve some of the changes identified and to meet the goals and objectives set out in an IRM plan.

5. Risk Planning Template

An authority's IRM requires to consider both national and local level issues. At national level there is a need to embrace schemes such as integrated emergency management as detailed within the Dealing with Disasters Together document. There is also the need to meet requirements for civil contingencies and national resilience as developed under the New Dimensions Initiative.

At a local level issues affecting the national environment, heritage and social factors will need to be considered with partner bodies and organisations. This will require active discussion with local authority and voluntary sector organisations, commercial, insurance and national organisations which have influence on a wide range of community safety matters. Identifying these organisations and their contribution as part of an overall IRM strategy is therefore a key feature.

Liaison will be particularly important with other regulatory bodies, such as those responsible for building standards, environmental protection and health and safety. Each organisation has a contribution which may aid the overall objectives of IRM and it is important that the fire authority plan recognises existing working practice and likely added value.

In Scotland particular importance is placed upon Community Planning Partnerships and it is vitally important that the fire authority IRM plan tailors activity for the benefit of the whole community where this is practical. Internally there is the need to avoid departmentalisation of IRM by ensuring there is an effective strategic overview of all contributing activities.

Stage 1
Identify existing and potential risks to the community.

It is necessary to identify, characterise and prioritise the existing and potential risks within the authority area. This includes looking in detail at what has happened in recent years and what may reasonably be expected to happen and includes number type, location and time of day of incidents.

At a local level the gathering and analysis of data is essential to support the decision making process. To allow risk profiling at a local level, a system should be devised for subdividing the authority area into geographical segments. These segments should be geographically continuous, suitably sized to assist with the identification of local trends and disproportionate activity levels and will be used as basic units for data collection.

Data used in the planning process must be reliable, valid, accurate and complete and authorities must have confidence that their data meets these criteria. Appendix A contains a list of possible information sources for informing the risk identification and profiling system and a data set list.

The gathered data should be presented by means of tables, graphs or maps etc. showing totals, trends and comparisons and identifying actual incidents, areas and time periods and people in terms of relative risk. Presentation in a user-friendly way will assist. Levels of prioritisation should be established in respect of risk by establishing median levels and action levels. An upper tier risk is likely to be where life or property loss is beyond the norm for the area.

5 years may be considered a suitable period for analysis that will reveal a trend, unless there is specific additional supporting evidence. It is necessary to guard against the short-term benefits that may accompany some short-term community safety initiatives.

Stage 2
Evaluate the effectiveness of current preventative and response arrangements.

The existence of recorded data in a manner that shows totals and trends will allow internal comparison within the authority area and external comparison with national statistics or family group members. In the light of the data collection and risk profiling, an authority should examine what it currently does, what it achieves and how its performance compares with others.

An evaluation of performance should identify

- Effectiveness in prevention of emergency incidents, deaths and injuries.
- Emergency response effectiveness in saving life and property

Strengths and weaknesses in current prevention, response and resource allocation should be identified and consideration given to how well the present distribution of resources match the pattern of risks identified. This will allow opportunities for improvement to be identified by comparing performance with what might be judged achievable.

Given the move towards evaluating risk to life, existing arrangements should be challenged.

- What can be done differently?
- Is the balance right between prevention and intervention?
- Can resources be redirected to activities that have greater benefit?

Appendix B contains a number of specific questions to consider at the evaluation stage.

Stage 3.
Identify opportunities for improvement and determine policies and standards for prevention and intervention.

Reaching decisions about change potential is likely to be an iterative process. An improvement in any one area may require a shift in resources and there may be a number of ways of achieving this, each with different implications. Accordingly, it is recommended that decisions on improvements, policies and standards be taken one step at a time.

- Improvements

Opportunities for community safety improvement using preventative measures should be identified. The principal aim is call reduction with resultant reduction in deaths and injury, and the protection of the built and natural environment. Goals and timescales should be set.

Fire authorities already operate policies and practices within a community safety strategy and this could be the basis for progressing prevention activity improvements within an integrated approach. The work and advice available from the National Community Fire Safety Centre is useful in developing new innovative approaches in this regard. There is a need to evaluate the effectiveness of these preventative activities so that they can be quantified as part of the IRM approach.

IRM relates to all types of incident the service may respond to and the authority may have a significant part to play in prevention of non-fire incidents which fall within the remit of other agencies by working in collaboration with the other agencies to deliver the wider aspects of improved public safety.

- Policies

Policies are needed to deliver some improvements which may relate to staff conditions of employment or operational matters. Achieving change in some of these matters is currently under discussion but it is anticipated that brigades will at a local level seek to improve flexibility in operational response by using part-time and full-time staff in a more integrated way, to increase part-time availability, for example, or meet staffing shortfalls where appropriate through the use of programmed overtime. In addition, it is also expected that positive action will be taken to reduce unwarranted operational activity through call challenge techniques, prior to mobilising resources, and close examination of response options for designated types of incidents. It is therefore important to identify potential changes where they are an essential component of delivering improvements.

- Standards

Fire authorities will be required to set their own standards for both prevention and intervention purposes, following consultation. These standards should be expressed in terms easily understood and which will allow performance to be measured.

The emergency response standards adopted by authorities may identify categories of call or particular circumstances where the response option adopted differs from the previous prescriptive requirements required by national standards of fire cover.

Response standards set for incidents should identify target attendance times and resources to be deployed for different types of call. Because of the geographical variation in risks, it is expected that emergency response standards will vary throughout each authority area and be proportionate to the risks.

The prevention and intervention standards that are being set will have resource implications and these need to be compared with the potential benefits that might be achieved by improved community safety.

In anticipation of this change in approach the strict application of the Scottish Central Fire Brigades Advisory Council recommended Standards of Fire Cover will not be applied. However, to assist in the transitional period it is anticipated that these existing standards will be used by fire authorities so that they can inform the public of variations and changes being introduced. Further guidance on the audit of standards is set out in the Audit and Monitoring Section of this note.

Some policies and standards will depend on the contribution of other agencies and what is needed from joint working arrangements with other statutory and non-statutory partners should be set out clearly. This should include the contribution in the prevention of incidents and in emergency response.

The outcome from this stage of the process should be:

- Clear goals for improved community safety.
- The areas identified for improvement.
- The policies designed to deliver the goals and improvements.
- The standards set for prevention and intervention.

Policies and standards will be a balance between:

- What the authority and stakeholders would like to provide
- What is practical and feasible
- What is affordable

They will be informed by:

- What has previously been achieved in the authority area
- What has been achieved elsewhere
- Nature and scale of improvement opportunities.

Appendix C contains a number of specific questions to consider at the improvement, policies and standards stage.

Stage 4.
Determine resource requirements to meet the policies and standards

Having determined the goals, policies and standards, it is necessary to consider the resources needed. The starting point is of course the existing level of provision and it may be found necessary to redeploy resources to areas of greater identified need.

In areas where the level of risk changes at different times of the day or night and a more dynamic response is required, greater flexibility may require to be provided than previous. This may bring into question previously accepted locations, staffing and use of fire stations and with it the possibility of resources being sited at locations other than at fire stations.

The maintenance of safe systems of work for firefighter safety is an important consideration when considering changes, existing regulations and guidance relating to health and safety matters should continue to be complied with.

Appendix D contains a number of specific questions to consider at the resource requirement stage.

6. Consultation

It is expected that fire authorities will consult on the arrangements for managing the risks from fire and other incidents and be open and transparent about its understanding of the risks to the public and firefighters. It will also wish to inform about the process it is following to meet those risks and safeguard staff.

Fire authorities should consult widely as part of the process of preparing their IRM plan because this will help to ensure the plan draws on the widest possible range of data and views and represent the best possible response to local needs and wishes.

Effective consultation can act as a catalyst for greater community participation. If members of the public think they are being listened to they are more likely to make suggestions for improving services or ask for information. Where authorities maintain an ongoing dialogue with communities, local opinion about options for change can be canvassed at an early stage.

The three principal areas on which consultation is expected are:

- The draft IRM plan and initial Action Plan
- Annual Action Plans
- Changes in intervention standards and/or resources not included in an annual Action Plan

Local circumstances may suggest consultation on other issues where this could be beneficial to the authority and/or communities.

Appendix E contains further guidance on consultation procedures.

7. Audit and Monitoring

The Accounts Commission for Scotland currently compares performance between Scottish brigades using five Statutory Performance Indicators (SPIs). The Commission in its consultation for 2004-2005 SPIs, issued in June 2003, indicated it was keen to keep the level of indicators about the same to assist in maintaining continued stability in reported information, especially to help the new Best Value audit regime, and to improve or delete indicators not meeting its selection criteria.

The existing five indicators for the fire service are

- response times,
- sickness absence,
- call response time,
- casualty rates per 10,000 population and
- the number of accidental dwelling fires per 10,000 population.

In looking at these indicators in the context of IRM, the first indicator will have a questionable value in future. This is because the weight and speed of any fire call response, is currently measured in the number of appliance(s) and their attendance time(s) set against national criteria, and these standards will not be determined nationally in future. Local judgements, based upon risk assessment, will be used to determine the speed and weight consequently of any firefighting attack so making intra and inter brigade comparisons difficult.

During 2004-2005 there will however be a transition phase as brigades and fire authorities develop and consult on their local IRM plans. In this transitional period it is viewed as being helpful to the public to recognise the change outlined if the current response times SPI, with explanations where necessary, were retained to explain any significant in-year variations.

There is also likely to be some variation in call response times if, again as part of IRM planning, brigades begin to more robustly challenge callers before committing the brigades' resources. The existing call response time SPI features two levels of call handling time, within one minute and within two minutes, and, for similar reasons explained regarding the response times SPI, it is considered both should continue for next year.

Clearly as the IRM process unfolds, it will be necessary to view alternative SPIs. The IRM process is based upon improved outputs in terms of less deaths, injuries and property losses. A new series of SPIs may therefore need to be developed that focus upon

- less activity, from unwarranted calls and fire calls generally, and
- less property loss, recorded against spread of fire.

There is also the need to consider other extended role activities in non-fire rescues and property mitigation work. This activity is yet to be defined but will need to take account of common functions like road accident rescue and environmental safety related to hazardous materials or events like flooding. The Inspectorate will retain an overview of the application of standards to help provide reassurance to Ministers and the public as to the equitability of service provision in Scotland.

In addition to auditing performance for comparison between brigades, two further aspects will be considered. Specifically fire service reform is based upon a 'Heads of Agreement' accepted by both employer and employee representatives. Verification is required that the intended benefits (including savings) of the various national changes are being delivered locally. Stage 2 payments (average pay increases of 7% distributed as agreed by the NJC) due for the 7 November 2003 require a report from the NJC joint working group on 31 October 2003 and Stage 3 payments (average pay increase of 4.2%) by 1 July 2004. The Accounts Commission have agreed in principle to become engaged in a verification process and are in discussion with COSLA and the Scottish Executive about what that will cover and the timetable to be followed.

These verification audits will require measurable performance improvement. Already identified as being in the spirit of such an improvement will be staffing flexibility, using pre-planned rather than casual overtime, integrated provision of riders between full and part-time firefighters for appliances, support for part-time contracted hours, call challenge activity in fire control rooms, wider engagement in safety work and better emergency response arrangements, especially those related to national civil contingency resilience.

In addition IRM requires the production of plans which reflect local requirements and are designed to improve the overall desired outputs. The design and subsequent adoption of any IRM plan is recognised as dependent upon a range of factors but all brigades are expected in year 1 of the 3 year initial planning period to have produced, consulted and be ready either before or no later than 1 January 2005, to introduce quantifiable improvements that are cost neutral or produce savings and that meet locally identified higher risks and reduce emergency response activity relating to avoidable calls. It is also envisaged in this first phase of the plan that the number of emergency rescue appliances will not significantly reduce.

The achievement of the above will require a planning approach that is itself focused and thorough. Monitoring by the Inspectorate will be undertaken throughout the period on a quarterly basis, commencing with a reporting period concluding on 31 December 2003.

The Inspectorate will also utilise external expertise when appropriate to examine the quality and competency of the IRM approaches adopted by fire authorities and to assist in the development of IRM guidance and support.

8. Timescale

The following phases are therefore envisaged based upon the identified framework outlined in this document.

PHASE 1 – REPORTING 31 DECEMBER 2003

- Objective assembly of data available locally on safety partnership activities.
- Conslusion of the data management (costs, process and information to be used) approach to be followed, which has been authorised by fire authority.
- Local activity* to improve emrgency and safety responses will have been considered and consulted upon with workforce.

PHASE 2 – REPORTING 31 MARCH 2004

- Planning process fully defined with assets required either in place or to be introduced in new financial year.
- Local activity improvements either commenced or about to commence.

PHASE 3 – REPORTING 31 JULY 2004

- Planning continues.
- Local improvements in place.
- Key outputs for plan and prioritisation of planning options determined.

PHASE 4 – REPORTING 31 OCTOBER 2004

- Plan outcomes for Year 2 (2005-2006) identified.
- Risk strategy, asset requirements and internal consultation underway.
- Service plan and budget cycle synchronised with IRM planning requirements.

PHASE 5 – REPORTING 31 DECEMBER 2004

- Public consultation on year 2 plan concluded.
- Decisions appropriate for fire authority identified to ensure plan can be undertaken in full on or before 1 April 2005.

* Local activity refers here to the policy issues identified earlier related to improved flexibility and reduction in unwarranted operational activity.

9. Management Arrangements

The process of managing IRM in Scotland recognises the distinct roles of Government and Fire Authorities, professional advisers including HM Fire service Inspectorate, and those within brigades undertaking the task of introducing IRM plans and the overall approach.

Consequently a four level approach has been adopted:

- Policy determination
- Strategic leadership
- Technical guidance
- Practical implementation

The first tier responsibility rests with the Scottish Executive and Fire Authorities working through the COSLA established Fire Interest Task Group. Matters of overall policy will therefore be referred to these bodies for discussion and consideration as to overall IRM policy direction.

A small task group, chaired by HM Chief Inspector of Fire Services, provides strategic leadership. This group includes a representative at principal officer level from Dumfries and Galloway, Lothian and Borders and Strathclyde fire brigades. The brigades therefore represent the scale and diversity, in terms of operational and fire authority management, of brigades throughout Scotland. They also include the two Scottish brigades having the longest experience of developing a risk based emergency response.

Technical guidance is provided by the brigade appointed liaison officers of each brigade working alongside the designated Inspectorate officers responsible for IRM. The Inspectorate will facilitate and chair this group.

Practitioners working within brigades under the direction of the brigade appointed liaison officers will also meet to aid progress and help share best practice. This group will be facilitated and chaired by a member of CACFOA Scotland under the auspices of the established Operations Committee.

Appendix A [to Fire Authority Development Framework]

Information Sources which may inform the risk profiling process

- Brigade incident records
- Fire Safety records
- Local risk records
- Scottish fire statistics
- UK fire statistics
- Census data
- Deprivation data
- Brigade local statistics and survey results.
- British Crime Survey results
- Scottish Executive research reports
- Scottish Housing Survey results
- Road Traffic Accident statistics
- Local and statutory performance indicators
- Fire investigation findings
- Local council housing information
- Local planning information and strategies
- Historic Scotland heritage database
- Scottish Environmental Protection Agency (SEPA), environmental information and forecasts.
- Employment patterns and movements.
- Community social profile
- Ethnicity profiles.
- Health and socio-economic profiles.
- Occupancy of commercial and industrial premises.
- Transport infrastructure.

Data sets

- Number, type, time and geographical location of all incidents
- Specific incident types as a proportion of all incidents.
- Incident totals per head of population
- Number of appliances, equipment and people mobilised to and used at incidents.
- Activity and use profile of special appliances
- Number, type and location of calls attended where no action was taken.
- Number of incidents attended by flexi duty officers with time profiles.
- Causes of fire and other incidents attended.
- Factors contributing to cause of incidents.
- Factors contributing to development of fire spread.
- Type and extent of smoke alarm provision in dwellings.
- Smoke alarm provision, operation and outcomes in fire incidents. Extent of domestic sprinkler provision in dwellings
- Number, time, geographic location and profile of fatal and non-fatal casualties.
- Rate of fatal and non-fatal casualty per head of population.
- Number, time, geographic location and profile of service rescues from incidents.
- Number, time, geographic location and profile of self-rescues.
- Age range and profile of population
- Nature, type and tenure of housing.

Appendix B [to Fire Authority Development Framework]

Suggested issues to consider at the evaluation stage.

- How does performance in reducing deaths and injuries in incidents compare with other authorities? How is the year on year performance?
- To what extent could more lives have been saved by improved community safety initiatives?
- Are resources currently targeted at those sections of the community judged to be most vulnerable?
- How effective is prevention work and what is being achieved?
- Are partnerships with other agencies delivering the objectives sought?
- Are resources currently deployed in the correct locations to meet identified risks?
- To what extent could improved response times save more lives?
- Is there a link between existing response standards and the deaths and injuries occurring?
- Which response policies are only in place because of national guidance requirements?
- Where response policies are outside national guidance, what do they achieve?
- What proportion of calls involve actual or possible risk to life?
- At what proportion of incidents do people rescue themselves?
- At what proportion of incidents are people rescued by the fire service and by other people?

Appendix C [to Fire Authority Development Framework]

Suggested issues to consider at the improvement, policy and standards stage

- Could injuries and fatalities in incidents be prevented by better prevention measures, improved public awareness, better enforcement, earlier identification of incident, swifter response or different equipment?
- Where incidents do not involve life risk but have large property loss or loss of heritage building or damage to the environment, could they be prevented or mitigated by better prevention measures, improved public awareness, better enforcement, earlier identification of incident, swifter response or different equipment?
- Is there anything being done simply because national guidance requires it?
- Can a better outcome be achieved if existing resources are in different locations or with different appliances, shift patterns and/or crewing arrangements to match demand?
- Can more lives and property be saved if human resources are redeployed in prevention or intervention functions?
- How do the rate and trend of fire and other incidents, deaths and injuries, compare with national or other areas figures, and what does this inform about the scope for improvement?
- Does examination of evidence suggest a greater need to improve prevention or intervention, or both?
- Where deaths and injuries were identified that could not have been prevented by improved response, what prevention measures could have been taken?
- What information is available about nonfire incidents such as road traffic accidents that would assist in identifying the need for greater effort in prevention or improved response?
- What current prevention activities might be done differently or better?
- What areas can be identified as offering greatest scope for early improvement?
- Are existing resources appropriately allocated, targeted at identified risks, and available at the appropriate time of the day/day of week necessary to achieve best effect?
- Is collaboration with other agencies achieving the objectives and is information shared? Is full and effective use made of staff from other agencies?
- What does the authority have to do and what does it wish to do?
- What changes in response policy might result in improvement?
- Should the authority attend all non-fire calls it receives, or could some be rejected and/or referred to other agencies?
- Would prioritising emergency responses to incidents be appropriate, and what would it achieve?
- Could some aspects of the service be provided in a different way or by other providers?
- Have operational policies and practices been reviewed and revised to address the risk management approach?
- What levels of attendance and response times are considered appropriate for each identified area of risk and for each type of incident to be attended?
- What type and number of vehicles and personnel are required to respond to different types of incident and at different locations?
- Does a cost benefit analysis support the proposed response?
- Will response arrangements need to vary according to the changing patterns of risk at different times of the day or day of the week?

Appendix D [to Fire Authority Development Framework]

Suggested issues to consider at the resource requirement stage.

- What staffing levels will be needed for the level of prevention work proposed, how much of this can be done by crews based at fire stations? What structure is needed for the teams doing this work, what proportion should be uniformed members and on what conditions should they be employed?
- If a significant change from the previous situation can staff be redeployed or will people with different skills be needed?
- What pumping and special appliances will be necessary to meet the authority's standards and the likely requirements?
- Is a traditional, fully crewed multifunctional pumping appliance always necessary?
- Are aerial and other appliances necessary to meet the requirements of the risk?
- Can other services (private or public) meet any of the appliance requirements, or must the authority provide them?
- What are the most effective locations for appliances to meet the requirements and response standards, taking account of the dynamic nature of risk? How does this compare with current locations?
- What additional resource provision and support arrangements are necessary to meet the potential for periods of increased activity, major incidents and natural disasters? Have inter-service and multiagency plans been established?
- What crewing patterns will best meet the response standards?
- What shift patterns are necessary to meet operational needs and good employment practice?
- Are there special training needs or would specialist teams be appropriate?
- How many officers are necessary to provide effective management of operational incidents, and on what duty system should they be available?
- Are arrangements in place to ensure operational efficiency, firefighter safety and consistency when working with other services at cross border incidents?

Appendix E [to Fire Authority Development Framework]

Guidance on consultation

Who should be consulted, and about what?

The guiding principle in deciding how extensively to consult is that any person or organisation that might have a legitimate interest in the proposals under consideration, or who may be affected by those proposals, should have the opportunity to express their views.

The scope of the consultation to undertake will be proportionate to the nature and extent of any changes proposed. The public is clearly most interested in those aspects that impinge directly on the service provided to them, and their perception of its impact upon their safety. This will include those instances when proposed changes will improve the service provided as well as when resources are redeployed from one location to another to meet identified needs. Staffing and related issues are usually of lesser importance to the public, but of course are of great importance to employees and their representatives.

The principal areas for consultation are:

- The draft IRM plan and initial Action Plan
- The annual Action Plans
- Changes in intervention standards and/or resources not included in an annual Action Plan

The draft IRM plan and initial Action Plan

The IRM plan will form the strategic 'blue-print' on which the fire authority will base its decisions about future service provision and how it intends to improve community safety. As a matter of expediency, consultation on the initial Action Plan should occur concurrently with the IRM plan. Before final decisions are made on either document, consultation should include:

- The general public, council tax payers, households, etc,
- Community organisations (including specific community groups, such as ethnic minority and other often excluded groups),
- Public representatives, e.g. MSPs,
- Business organisations,
- Local authorities, public agencies, and other emergency services,
- Employees (uniformed and nonuniformed) and their representatives,
- HM Fire Service Inspectorate for Scotland,
- Any other interested parties.

The annual Action Plans

Consultation should take place on subsequent annual Action Plans if these include any changes in the fire authority's standards and/or provision of resources for intervention services. As the Action Plan is likely to form part of the authority's business planning process it may achieve best effect if consultation is co-ordinated. The extent of consultation will depend upon the issues contained within the Action Plan. The principle set out above should form the basis for decisions about who should be consulted. Examples of the sort of situations that might arise, and those who may be consulted, are given in Figure 1.

Who should be consulted?	Examples of proposals for change
Communities, business organisations, and local authorities in the area covered by the appliance(s) concerned; and Employee representatives	• Alteration in the policies/standards set by the fire authority for attendance to specific types of emergency incident • Alteration in the standards and/or targets set for preventative activities to achieve improvement in community safety • Removal from service of pumping and/or special appliances • Permanent relocation of pumping appliances (other than day-to-day operational requirements and pre-determined movement to meet the changing nature of risk by time of day) • Change in crewing patterns of one or more appliances, e.g. shift crewed to day-crewed, constant crewed to variable crewed, etc.
Employee representatives	• Relocation from one fire station to another of a special appliance providing cover across part or all of the brigade's area • Changes in the number of personnel provided to crew appliances

Figure 1

Changes in intervention standards and/or resources not included in an annual Action Plan

Circumstances may arise in which the fire authority might deem it appropriate to amend the policies/standards it has set for prevention and/or intervention activities, or the provision/location of resources, which have not been included in annual Action Plans. Where this is the case, arrangements should be made to consult those who may be affected by the changes. These issues are likely to be similar in nature to one or more of those listed in Figure 1, and the guidance given there should form the basis for decisions.

■ ***What is the best way to consult?***

All forms of consultation whether face to face or more remotely managed, require a degree of expertise if helpful comments are to be obtained from consultees. Some methods require technical and analytical skills that may not be immediately available within fire authorities, particularly when dealing with more complex or wide ranging issues, e.g. large sample surveys may require an understanding of sampling techniques and quantitative analytical skills. In seeking to prevent or minimise the effects of road traffic accidents, consultation may be more effective if done jointly with the police or ambulance service. Other agencies may have considerable experience of public consultation that may be of benefit.

There are many ways in which proposals can be drawn to the attention of the community and other interested parties to gather views and comments. Whichever methods are selected, it will be important to ensure that sufficient information is made available to consultees to allow them to make informed decisions. This might include:

- Details of the proposed changes in standards and/or resource allocation,
- Why these proposals are being made, including alternative options considered by the authority to achieve improved performance/community safety,
- How the net effect will improve community safety, and what the local impact will be on consultees,
- Any additional actions planned to be taken to ensure the proposed changes will deliver the improvements expected,
- The timescales in which it is expected that the changes will be implemented and the benefits realised.

The most appropriate technique for consultation can be selected by considering the complexity of the subject matter and its relevance to the people being consulted, and putting this into the local context. The key measure is the effectiveness of the process in gathering views and opinions about the proposals for consideration by the fire authority.

■ ***Some techniques that could be used are:***

- Advertising/articles in local newspapers
- Leaflets delivered to households
- Letters to other agencies, public/business representatives, MSPs, etc
- Fire Service websites
- Public meetings and meetings of specific community groups.
- Focus groups.
- Displays in libraries, public buildings, etc
- Meetings with local authority representatives and other agencies
- Meetings with employees and/or representatives

Sufficient time should be allowed for considered responses from all groups with an interest. Other than in exceptional circumstances, a minimum period of twelve weeks should be allowed for written consultation. A similar timescale is recommended for consultation on the draft IRM Plan because of its potential scope and complexities. For consultation about subsequent changes in standards and/or provision, a judgement should be made about the time. Sufficient time should be allowed for considered responses from all groups with an interest.

For consultation about subsequent changes in standards and/or provision, a judgement should be made about the time to be allowed for consultees to respond, taking account of all relevant factors.

■ ***What happens after consultation?***

At the conclusion of the consultation exercise, all responses received must be evaluated and formally considered by the fire authority before it reaches a final decision about implementing any proposals. The process should be open and transparent with all relevant factors and views taken into account, including perceptions of risks faced and public concerns and values. In due course a summary of the responses received should be made available along with response to the points raised.

Appendix 4

Fire and Rescue Authority Risk Reduction Plan

Wales a Safer Country

Introduction

The Fire and Rescue National Framework for Wales established the Welsh Assembly Government's commitment to reducing risk. In order for each Fire and Rescue Authority (FRA) to address this, RRP guidance has now been developed for Wales. The Fire and Rescue Authority Risk Reduction Plan – Wales a Safer Country replaces the previous guidance and policy of Integrated Risk Management Planning.

Each FRA must produce a RRP or annual action plan that focuses on community and corporate risk in a holistic way. The RRP is a strategic document that sets the agenda for the both the FRA and the Fire and Rescue Service (FRS) alike.

Each RRP must be accessible and presented in a clear and concise manner to citizens, communities, businesses and other stakeholders. The RRP must be closely linked to corporate and performance objectives of the FRA.

This RRP guidance gives the FRAs a risk management framework to identify and assess risk. Adopting this framework allows the FRA to allocate resources against known or foreseen risk, whilst considering other competing demands.

Further supplementary information and guidance for FRAs will continue to develop over time. It is envisaged that this information will be issued by Wales Fire and Rescue Service Circulars.

This RRP guidance is set out in 6 Chapters:

Chapter 1 – A Risk Management Framework

Chapter 2 – Principles of the Fire and Rescue Authority Risk Reduction Plan

Chapter 3 – Addressing Risk

Chapter 4 – Evidence Based Development

Chapter 5 – Integration of RRP and Risk Management within the Wider Public Service Agendas

Chapter 6 – Consultation and Participation in the Development of RRP.

Chapter 1: A risk Management Framework

Introduction

As society becomes more complex the duty of meeting the public's expectations whilst developing new and innovative ways of preventing emergency incidents is demanding and challenging. The 21st Century has seen a number of naturally occurring and man made disasters that have tested the emergency services. Managing the uncertainty whilst taking opportunities to improve public safety are the challenges that everyone who serves in the FRA face. A risk management approach will ensure FRAs deliver services that are good value, resulting in better decisions for the communities of Wales.

Effective risk management contributes to the better use of resources in reducing risk, whilst improving teamwork and promoting a shared trust in the FRAs from all stakeholders.

Such an approach will promote strong partnerships between the FRA, Welsh Assembly Government, citizens and communities. Risk management covers all aspects of the FRA, including: financial; human resource, health and safety, operational and their reputation. The FRA's RRP is designed to support strategic decision-making.

An integrated approach to risk management builds upon core public service values as identified within the Welsh Assembly Government's vision for public services[9]. This is supported by the Welsh Assembly Government's five-year action plan for delivering better services to Wales[10] which establishes what, how and where public services should be delivered. **Wales a Better Country**[11] states that public services in Wales need to focus on the needs of the communities and individuals. Further guidance on RRP integration is contained within Chapter 5.

What is Risk Management?

The Welsh Assembly Government acknowledges the expertise that FRAs and FRSs possess in terms of risk management. However, it is imperative that the terminology relating to risk management and risk reduction used in this guidance is understood by all. There are distinct phases of risk management, which include hazard identification, hazard analysis and risk assessment leading to risk control and planning culminating in a risk management approach to reducing the risk.

Hazard – can be defined as something that can cause adverse effects.

Risk – is the uncertainty that surrounds the future. Risk can also be described as the likelihood of the hazard causing adverse effect.

Risk management – combines risk analysis with appropriate control measures. Risk management allows the application of a framework that controls risk in a visible, repeatable and consistently applied manner, whilst supporting strategic decision-making.

There are many and varied approaches to risk assessment that range from quantifying risk to using professional judgement. Whatever method of risk assessment or analysis is used the outcome of assessment and any proposals emanating from the assessment must be validated, transparent and stand scrutiny.

Proposals and options presented should be considered against an options appraisal and must be proportionate to the risk. All risk management has an associated cost, whether it is an opportunity cost or financial cost. It must be remembered that risk control rarely eliminates risk, it serves to control it within acceptable levels.

Risk will change with time. Therefore, regular reviewing and monitoring will be required to ensure risk remains acceptable to the FRA. Risk management is effective when identified risk is reduced or controlled to an acceptable level with available resources. Regular review will deliver assurance that the strategic direction established by the FRA remains appropriate, proportionate and effective.

FRA and senior management ownership, support and leadership are critical to ensure risk management continues and develops. Communication throughout the FRA is essential for the Authority to build a risk management culture that promotes innovation. Risk management must be embedded within management decisions and linked to corporate objectives. Developing a framework that is transparent, open and repeatable is key to successful risk management.

Holistic risk management – is a strategic process that is systematic, proactive, continuous and broad in its vision. This strategic approach to managing risk is required by the Authority to set the direction and establish priorities balanced against opportunities and threats, whilst balancing costs and risks to the FRA. Whilst preparing their RRP, FRAs will need to consider amongst other priorities, technological advances, legislative changes, the social/demographic and linguistic composition that make up their area.

Throughout the whole process of risk management FRAs need to communicate with stakeholders to ensure they understand the FRA's search for continuous improvement. Communication is a continuous process that FRAs need to engage in an open and proactive way.

[9]1 Making the Connections; Delivering Better Services for Wales – October 2004

[10]Delivering the Connections: From Vision to Action – June 2005

[11]Wales a Batter Country – September 2003

RRPs should reflect a holistic approach to risk management – reviewing both corporate and community risk. This will demonstrate their willingness to be outward looking, identifying both opportunities and threats. It will allow FRAs to align resources to identified risks based on need. This should enable FRAs to deliver services to the communities of Wales that are effective, based on an economic use of resources and efficient methods of working.

Robust and inclusive risk management should build community engagement in the delivery of FRA services. At an individual level it should assist with workforce development and strengthen individual ability to anticipate, assess and manage risk, whilst allowing them to contribute to the success of the FRA.

Chapter 2: Principles of the Fire & Rescue Authority Risk Reduction Plan

Introduction

The Fire and Rescue National Framework for Wales established the priorities for risk reduction.

> *An Authority's RRP must make an assessment of risk, analyse the risk and deploy resources appropriately. FRAs must not only focus on the community but must also consider their corporate risk and business environment.*

The FRA's RRP must identify the Authority's aspirations and actions in reducing risk. The RRP is a live document that must be reviewed and monitored on a regular basis to ensure FRAs maintain focus on existing and emerging risk and that proposals made and actioned are having the planned outcome. RRP is based on a fundamental review of risk. Proposals must be managed carefully to ensure changes are planned, considered and justified against robust evidence that supports the proposed change.

Aim of Fire and Rescue Authority Risk Reduction Planning

The aim of RRP is to reduce risk through a managed framework that integrates the FRAs within the wider social justice agenda in Wales.

Objectives of Risk Reduction Planning

In order for FRAs to achieve the targets of the Welsh Assembly Government they must establish a strategy aimed at:

- Reducing the number of fires and other emergency incidents;
- Reducing the loss of life in fires and other emergency incidents;
- Reducing the number and severity of injuries in fires and other emergency incidents;
- Reducing the commercial, economic and social impact of fires and other emergency incidents;
- Safeguarding the environment and heritage, both built and natural;
- Providing services that are Value for Money (VFM); and
- Integrating the activities of their FRS within the wider social justice agenda.

Responsibilities of FRAs

FRAs must ensure they manage risk in a cost effective and efficient way, whilst using resources in a flexible and economic manner. **Responsibility for preparation of the RRP rests with each FRA. The RRP is the Authority's plan and indicates how it will manage risk; it is the FRS which actions and implements the plan.** The RRP is a strategic plan that clearly identifies risk and initiates control measures that the FRA deems appropriate. The Welsh Assembly Government will continue to support FRAs with strategic direction and policies.

The operating environment and the pace of change both internal to the FRA and the external environment will determine the longevity of the current RRP. Within the life of the plan the FRA will determine the level of focus it provides. **Annual action plans must identify the focus of the FRA for the following financial year, which**

must clearly identify any changes they will be implementing in the year ahead. Annual action plans Must be clearly linked to the current RRP

The RRP must be clear and precise about the intended actions of the FRA by identifying how they intend to manage risk. **The plan will also need to identify the ways in which the FRA can work in partnership with neighboring authorities and agencies in delivering their services to the citizens and communities of Wales.**

FRAs will need to develop, consult, approve and publish their RRP and annual action plans by 31st October for implementation in the following financial year. This should allow sufficient time for the Authority to identify risk, consult on proposals, review the consultation and publish the RRP or annual action plans as appropriate.

Consultation on proposed changes is an essential element for FRAs whilst preparing RRPs and annual action plans. Meaningful communication and consultation will ensure the FRA's stakeholders are fully engaged and participate in the process of continuous improvement. Openness and transparency must be achieved with FRAs presenting their RRP and annual action plans in a manner that clearly explains to a wide range of stakeholders their proposals and the intended outcome. **FRAs must demonstrate they have considered the responses emanating from their consultation.**

FRAs must consult widely and allow a **minimum of 12 weeks** for the consultation process.

Monitoring and reviewing existing plans is essential for FRAs to plot success of the plan against established objectives and strategies. It is also important to ensure the continued relevance of previous decisions and to demonstrate to stakeholders that there has been no increase in overall risk as a result of those earlier decisions.

When developing RRPs, FRAs will need to consider the safety of all of their personnel, in particular **fire-fighter safety**, ensuring proposals do not compromise Standard Operating Procedures. Additionally, FRAs need to recognise the FRS commitment as a category 1 responder to Local Resilience Forums and the need to deliver UK resilience under the auspices of the New Dimension programme.

FRAs will need to integrate fire safety inspections, community safety initiatives and intervention response arrangements, but also consider the wider Welsh Assembly Government's agendas that are impacting upon the public services. Integration of this risk-based approach is described in Chapter 5. FRAs must consider the diversity of the population they serve in order to design services that meet the needs of an inclusive community.

Contents of a Risk Reduction Plan

Each RRP is specific to the risk identification of individual FRAs but is expected to contain the following:

Identification of risk – as a first priority each FRA will need to identify risk, corporate and community. Each FRA will need to utilise appropriate established intelligence, such as, the Community Risk Register produced under the Civil Contingencies Act 2004. It is essential that the FRA identifies historical data to assist in future predictions.

Effectiveness of current control measures – it is necessary for FRAs to examine existing control measures and evaluate their effectiveness, This review will allow opportunities for improvement to be identified, whilst establishing the effectiveness of current resource allocation.

Identification of opportunities for improvement – FRAs must focus on the increased emphasis on prevention based services. Improvement of service provision should be tailored to allow the FRA to achieve the specific objectives of the Welsh Assembly Government in its approach to RRP. FRAs may need to adopt an incremental approach to reducing risk and resource allocation, and should present options for improvement within its RRP.

Service Standards – FRAs must be transparent in the manner they communicate Service Standards with citizens and communities they serve. They may wish to publish a map of the areas where the FRA will be delivering the established Service Standards or community fire safety initiatives.

Outcome of proposed changes – the FRA must present anticipated benefits on how the proposed changes will reduce risk.

In any review of stations FRAs must not only consider existing and anticipated activity levels, but also the interoperability of the station, changing levels of demand throughout the day, week or time of year and the wider role of the station in providing resilience.

To summarise, FRAs must have in place and maintain a RRP or resulting annual action plan that clearly identifies both corporate and community risk. The plan must detail how the FRA intend to manage risk and identify the intended outcome, FRAs must:

- Demonstrate they have adopted a holistic risk management framework;
- Produce a RRP or resultant annual action plan on which they have consulted;
- Have due regard for Welsh Assembly Government guidance in producing their plans;
- Utilise resources in an efficient, effective and economic manner; and
- Be engaged in the wider social justice agenda within their communities.

The outcome of this risk-based approach should be a RRP that clearly illustrates the Authority's commitment to continuous improvement and how they intend to allocate their resources whilst managing risk in a robust and open manner. **The desired outcome of deploying FRA resources must be the reduction of risk.**

The Annex contains questions that FRAs may wish to consider when developing their RRP or annual action plans.

Chapter 3: Addressing Risk

Education and Prevention

The Fire and Rescue Services Act 2004 places a statutory duty on each FRA to promote fire safety in its area. In particular they must provide information and promote safety to prevent fire deaths and injuries, limit the spread of fire and give advice to persons on means of escape from buildings or property.

Community fire safety has a key role to ply in meeting the Welsh Assembly Government's targets. The Welsh Assembly Government has established two committees to assist and advise on the development and implementation of policy; the Wales Fire and Rescue Service Advisory Committee (WFRSAC) and the Community Fire Safety Committee (CFSC). FRAs should reflect the deliberations of these committees in their education and prevention activities.

Education and prevention must be directed at the most vulnerable within the community, ensuring those who need the services of the FRA actually receive it. Feeling safe is a very important factor in the well being of the population, FRAs need to adopt a targeted response to ensure this is achieved.

The Welsh Assembly Government has been working with the three FRSs to develop teaching material that covers the 4 key stages of education and learning in schools. This has resulted in a unified programme of fire safety to schoolchildren. FRAs are encouraged to promote this as best practice and are required to pay due regard to this important strand of education and prevention activity. Key Stage 1 learning material has been launched with additional material for subsequent key stages to follow.

This initial material has been achieved by combining the expertise and experience of the Community Fire Safety Departments in Wales to produce core-teaching materials in both English and Welsh that contain a consistent fire safety message within the Personal and Social Education Framework Wales. All schools in Wales will be provided with work booklets to be distributed to pupils. The workbooks include activities covering all aspects of fire safety and intend to encourage a more responsible attitude towards fire. Also included is a fire safety questionnaire for parents and guardians.

The Welsh Assembly Government is funding a pilot of Arson Reduction Teams (ARTs); the team consists of a police and fire and rescue secondee with specialist community communication skills. During the FRA's RRP the work of this team will need to be reviewed and developed to ensure the success of these teams is sustained.

FRAs also need to recognise the positive impact the use of their resources have, and in particular the positive role model and image that A FRS personnel presents to the community and young people. FRSs already engage in very positive work; this helps build community cohesion, reduces community risk and promotes good citizenship. FRAs are encouraged to continue this good work through their innovative approach to ensure all sectors of society are engaged in this wider social justice agenda.

Service Standards

There is an expectation from the citizens and communities of Wales that fire appliances and resources will arrive quickly to a fire in their home or workplace. Additionally, they expect FRAs to respond to a range of other emergency situations. To this end the FRSs deserve their reputation for providing an effective and professional response to fires and other emergency incidents.

Although the FRA need to place a greater emphasis on preventing fires from occurring in the first place, the need for an effective response to an anticipated or actual incidents that do occur must not be diminished. FRAs will also need to develop their capacity to respond to new challenges, such as, terrorist incidents in accordance with emerging needs of the national New Dimension programme.

In the summer of 2005 the Welsh Assembly Government established a technical working group to review Service Standards. **Service Standards will be introduced in Wales.** Initial Service Standards focus on life risk and will be developed to ensure citizens, communities and businesses understand them. The thrust of RRP in Wales is for FRAs to allocate resources appropriately to risk.

FRAs must clearly demonstrate the level of service that citizens and communities can expect to receive; this information must be based on established Service Standards and community fire safety initiatives. This promotes open and honest communication between the FRAs and communities they serve, it also allows stakeholders to evaluate the effectiveness of the service against an established standard.

It is envisaged that Service Standards in Wales will develop to reflect the range of activities that the FRAs me engaged in, such as, road traffic collisions, fires in other buildings and other emergency incidents etc.

Whilst these standards will evolve over time, the issue of weight of response in respect of number of fire-fighters and the equipment dispatched to incidents will be the subject of specific consideration by individual FRAs. This allows for local solutions to be developed for local risks. The Authority will need to recognise safe systems of work that are required to ensure fire-fighter and community safety are not compromised. FRAs must define the scenario that each risk attracts, decide the weight of response and determine when resources will arrive.

FRAs should ensure a professional and effective response is available to meet the range of incidents they may encounter, This includes:

- Staff are trained to professional standards, are familiar with risks and understand the concept of risk management and reduction;
- Effective command and control systems are in place;
- Incident commanders have appropriate training and experience;
- The right equipment is available and staff are fully supported with appropriate resources to deal effectively with incidents, within agreed Service Standards, to ensure the safety of those undertaking the tasks; and
- Working together as appropriate.

Training and Development

Personnel working within the FRA require appropriate skills and knowledge commensurate with their role within the organisation. Integrated Personal Development System (IPDS) is a competence-based approach that is targeted at individuals and their specific developmental needs. Individual competence is based on skills, knowledge and understanding with the individual acquiring and maintaining an agreed level of competence commensurate with role.

It is essential that all staff possess the required competence to effectively and safely manage their working environment whether it be operational or corporate.

During the development of proposals under RRP, each FRA will need to review the competence of all its personnel. FRAs must ensure their standard operating procedures, policies and competence of personnel match the resources available to reduce risk.

Corporate Risk

Understanding the FRAs corporate risk will need an intimate knowledge and a sound understanding of the FRA and the environment in which it operates. Identifying corporate risk is critical to the sustainability and continuity of the vital services FRAs provide to the communities of Wales. FRAs may wish to consider some specific areas during its corporate assessment of risk:

- **Strategic** – long term strategic objectives, such as, regulatory changes, reputation and changes to the physical environment;
- **Operational** – the day to day issues that affect the FRA as it strives to deliver its corporate objectives;
- **Financial** – impacts that may prevent effective management, stewardship and control of finances;
- **Compliance** – these affect FRAs ability to meet health and safety, environmental, data protection, employment practices and regulatory issues;
- **Business Continuity** – FRAs must recognise the commitment FRSs have under the Civil Contingencies Act 2004 to have in place adequate business continuity plans; and
- **Technology** – FRAs should consider the advances in technology and how these could best be used.

The above is by no means definitive, but should act to stimulate thought and discussion whilst FRAs are conducting their RRP. Assessing corporate risk will allow FRAs to develop a holistic approach to risk reduction through a robust risk management framework.

Chapter 4: Evidence Based Development

Introduction

FRAs must produce RRPs that address local opportunities and risks. RRPs must be forward-looking and shaped by evidence rather than a response to short-term pressures. RRPs should tackle causes and not the symptoms.

Fire Services Emergency Cover Toolkit (FSEC)

FSEC is widely available to Authorities to enable them to predict and manage the risks within their areas. While FSEC is not the only modelling tool available to Authorities, it is the Welsh Assembly Government's preferred tool for gathering and interpreting evidence to inform the development of proposals contained within the FRA's RRP.

FSEC can inform the decision-making process in the placement of operational resources, by testing proposed changes to operational cover.

The use of computer modelling must not be the sole factor in taking such decisions. Authorities will need to validate the information provided by FSEC from other sources and in discussion with personnel, experts in the field and communities affected by the decisions.

When presenting the evidence in the RRP, Authorities must ensure they explain the benefits and assess the implications upon individuals and communities. Evidence must be presented in a form that the audience can understand. As well as assessing the immediate impact, a longer-term view should also be taken.

Chapter 5: Integration of RRP and Risk Management within the Wider Public Service Agendas

Risk management taken in isolation is an insular approach that will not identify the true risk to the FRA. Holistic risk management is essential in our ever-increasing complex world, especially where there are competing demands for scarce resources. FRAs have two distinct operating environments, which have their own inherent risks; the external community risk and the internal corporate risk. Both environments require careful management if risks are to be reduced or controlled to an acceptable level, opportunities are to be exploited and threats are to be identified.

Public services in Wales, including the FRAs, need to focus on the needs of the communities and individuals alike. An integrated holistic risk management approach will allow each FRA to tailor its resources to identified risk. Each FRA through its effective consultation and participation needs to engage with citizens and communities to ensure their views on service provision are considered.

The following chapter is not exhaustive but identifies to FRAs the level of integration that the Welsh Assembly Government expects from the FRAs whilst they prepare their RRPs.

The Welsh Assembly Government has established strategic agendas for the public services in Wales. These include the following:

Wales – A Better Country

The strategic direction of this agenda is rooted in a vision that the country becomes fairer, more prosperous. healthier, better educated and where social justice is embedded within policy making. Key to this strategic vision is smarter working and working together to make a bigger and longer-lasting impact of the Welsh Assembly Government and key service providers.

FRAs will need to recognise this vision in the development of their RRP. The vision of this strategy is for a sustainable future where action for social, economic and environmental improvement work together to create positive change.

One single department or agency can not deliver this vision. FRAs through their RRP should be able to identify ways in which they can influence this agenda and contribute to the wider inclusion of social justice in Wales. FRAs RRP must also identify the way in which the Authority intends to collaborate and work in partnership with other agencies and stakeholders.

> *Making the Connections: Delivering Better Services for Wales and Delivering the Connections – From Vision to Action*

The Welsh Assembly Government's vision is that public services are essential to a prosperous, sustainable, healthier and a better educated Wales. joint working is vital to deliver public services of top quality; they must be responsive to the needs of individuals and communities, delivered efficiently and driven by a commitment to equality and social justice. In order to deliver this commitment to the public services the Welsh Assembly Government has published a 5-year action plan.

A collaborative model fits within Wales as its geographical pattern is distinct and the attitudes and values of the population is one of a sense of ownership in the public services. FRAs need to include citizens and communities in the development of their RRP to ensure their views and experiences are used by the FRA. This will allow FRAs to forge long and lasting relationships on which each RRP and annual action plan will continue to evolve to suit local needs and risks.

FRAs must design the allocation of their resources in a flexible manner that supports the reduction of risk. Effective, inclusive and open communication and consultation will ensure control measures and proposals made under the FRA's RRP are fully appreciated by all stakeholders.

FRAs need to design services with other agencies and partners in an innovative and planned way to ensure they are delivered in a sustained and efficient manner.

People, Places, Futures – The Wales Spatial Plan

This plan provides the basis for working together on shared local agendas; providing distinct local approaches to local problems.

Spatial planning is about reflecting local activities and investments across a geographical area in a clear and honest manner in order to shape the future of services being provided. FRAs need to pay cognisance to this strategic plan and other emerging groupings to ensure a joined-up and collaborative approach is adopted to local issues; ensuring a sustainable future is achieved. This will ensure the FRA's RRP will have due regard to the impact of their proposals on other sectors or administrative boundaries.

When designing services and proposals under RRP, FRAs need to recognise the distinctiveness of the communities that exist throughout Wales. Through effective communication, consultation and participation FRAs can build upon the already established sense of place and pride within the communities they serve. The challenge for FRAs will be to retain this sense of place and pride whilst embracing and promoting cultural changes that exist in our society today.

In summary the FRAs need to engage with a wide spectrum of stakeholders to ensure the agendas impacting on the public services are recognised. The Welsh Assembly Government's policies are designed to ensure that the people of Wales receive the highest standards of public services. Each FRA has an important role to play in contributing towards this searching agenda.

Wales Programme for Improvement (WPI)

WPI is built on a process of self-review and improvement established against a risk assessment, where Authorities seek arrangements for continuous improvement. A programme of self-assessment will allow each FRA to identify the main opportunities, threats and constraints they face in meeting their aims.

By the very nature of the distinctively Welsh focus of RRP, FRAs will be undertaking a fundamental review of their whole operating environment; community and corporate.

There is an emerging understanding amongst key stakeholders that where possible, planning processes and plans should be streamlined and unified as far as possible. This is considered to be the case with RRP and WPI – Fire.

It has always been a principle of WPI – Fire that regulation should support improvement; it should not simply highlight where action is required, but it should be part of the solution.

The full detail an the integration of these two processes will emerge under the guidance that emanates for WPI – Fire.

Financial Planning Cycles

This initial guidance allows FRAs to integrate their RRP with their financial planning processes. Prudent resource planning needs to consider the financial implications of the proposals being made under the FRA's RRP. The full impact of proposals can be identified early allowing the FRA to consider the options available to them whilst considering their financial climate.

A key objective of in Welsh Assembly Government is to assist Local Authorities to plan more efficiently over a longer time horizon than is currently the case. The Welsh Assembly Government is consulting on the introduction of three-year revenue and capital settlements for Local Authorities, including the FRAs. FRAs will be notified of developments within this area as and when they are available.

Chapter 6: Consultation and Participation in the Development of RRP

What is consultation?

Consultation and participation are a means of engaging individuals and organisations in the discussion, shaping and delivery of policy. It is the formal process by which outside interests and views are asked for on proposed policies stemming from the RRP It is a way of testing the proposals contained within the RRP with those with an interest and/or expertise and of demonstrating a willingness to make changes or amend proposals as a result of responses received. Consultation is not an option. It is a statutory duty.

Who should be involved?

Involving citizens, communities and personnel in shaping the proposals from the outset through to formal consultation will lead to better and more inclusive policy-making by the FRA. Authorities must, as a matter of course, consult all those who have an interest in the RRP. A diversity of views must be sought to test received wisdom and avoid unintended consequences. FRAs must work with representative and community groups through wide-ranging media and information campaigns to ensure they reach as wide an audience as possible.

The Welsh Assembly Government would expect FRAs to consult as widely as possible and with those who are directly affected by any proposals being made. The following list is not exhaustive and is supplied for consideration:

- The general public served by the FRA. FRAs need to consider how to engage the populations they serve as widely as possible: methods could, include leaflet drops in communities specifically affected by proposals in the RRP; local media and public meetings;
- Community organisations, including specific community groups such as ethnic minority and other often excluded groups. There are three statutory equality organisations – the Equal Opportunities Commission, the Commission for Racial Equality and the Disability Rights Commission, as well as groups such as the All Wales Ethnic Minority Association. Wales Women's National Coalition, Stonewall Cymru and Disability Wales;
- Public representatives including politicians representing the local area;
- Local business and business representative organisations such as the Federation of Small Business Wales and Chambers of Commerce and Trade;
- Local Authorities, Town and Community Councils, public agencies and other emergency services, including neighbouring FRAs with which the consulting FRA may have reciprocal agreements (i.e. reinforcement schemes), Local Resilience Forums, etc;
- Employees and their representatives; and
- Assembly Members and Welsh Assembly Government as the elected representatives of he people of Wales and the body with principal responsibility for fire and rescue issues in Wales.

The FRAs and the Welsh Assembly Government enjoy good working relationships in the development of strategic policies. As a continued commitment to collaborative and partnership working FRAs must informally discuss proposals and options within their RRP and annual action plans with the Minister for Social Justice and Regeneration prior to the FRA commencing its public consultation. The National Assembly's Social Justice and Regeneration Committee may also wish to view the FRA's RRP or subsequent annual action plans.

Wide inclusive consultation and participation with stakeholders will ensure robust and inclusive decisions are taken, whilst promoting ownership, responsibility, transparency and openness. Internal to the FRS it should also increase motivation, morale, learning and teamwork. Communication and consultation is required with both internal and external stakeholders. This will ensure the perception of risk, the risk management process and expectations are understood by all partners. This will allow expectations of stakeholders to be managed against FRAs priorities.

Annex

Risk Management Framework

A risk management framework is shown below. The framework has 8 distinct components, which will allow for a robust approach to risk management and the production of the Authority's RRP.

1 **Scan the environment** – this involves FRAs conducting a critical review of its operating environment to identify opportunities, threats and hazards.

2 **Contextualise risk** – once opportunities, threats and hazards have been identified FRAs will need to define what these mean in terms of risk to the Authority.

3 **Assess impact and establish priorities** – this is when the FRA will determine their acceptable level of risk and establish their own priorities.

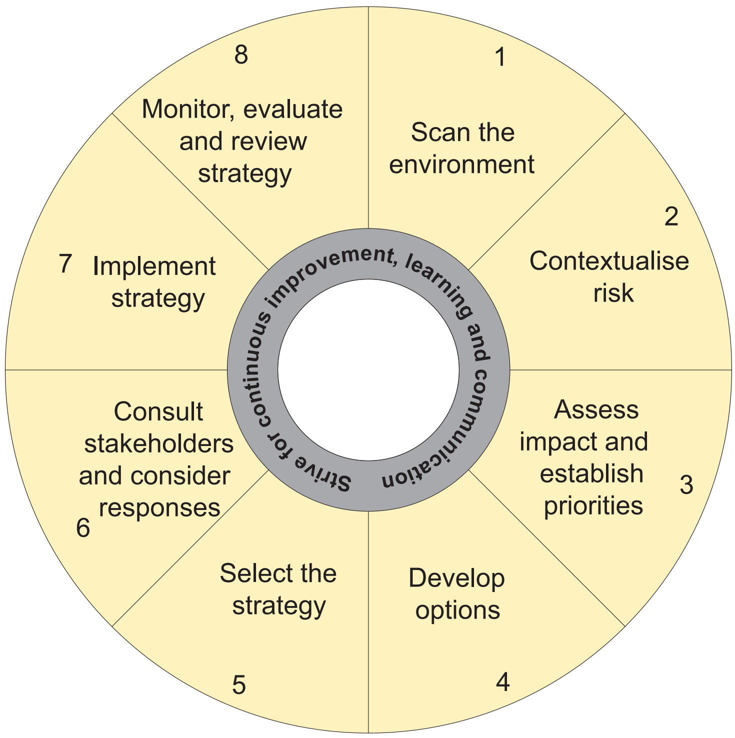
4 **Develop options** – by determining their acceptable level of risk, each FRA Must establish options for reducing the risk.

5 **Select the strategy** – when selecting a strategy FRAs must determine the control measures they feel appropriate and proportionate to the risk.

6 **Consult stakeholders and consider responses** – during the consultation FRAs must also make available their risk assessments and evidence they have used to propose the chosen strategy. FRAs must consider views of the consultees and publish their response to the comments submitted.

7 **Implement strategy** – following consultation FRAs can then implement their proposals or amended proposals as determined by the consultation.

8 **Monitor, evaluate and review strategy** – once a strategy has been implemented it will require evaluation against established objectives. The environment within which the FRAs operate will require monitoring to ensure the RRP remains valid and current.



The following is a list of questions that FRAs may wish to consider in the development of their RRPs. This list is not intended to be exhaustive but to act in stimulating thought and debate within the FRA.

IDENTIFICATION OF RISK

- How many and what type of incidents has the FRS attended?
- How serious were the incidents?
- How many fatalities and injuries have been attributed to fires, road traffic collisions or other emergency incidents?
- What are the causes of fire, road traffic collisions or other emergency incidents?
- How many rescues have the FRS conducted?
- Have there been any changes or are there any impending changes in legislation?
- Have there been any changes to policy (either internal or external)?
- What are the demographics of the community within the FRA area?
- What is the risk profile of the communities within the FRA area?

EFFECTIVENESS OF CURRENT CONTROL

- How effective are existing control measures: prevention, education and intervention?
- How efficient is the current allocation of resources?
- How effective is communication with stakeholders?
- How do injury rates to personnel compare to previous years and other FRSs?
- What responses have the FRA received from their stakeholders on the quality of services provided?
- What responses have staff made to the FRA on existing control measures?
- Are services being delivered that best utilise the FRA's resources?

IDENTIFICATION OF OPPORTUNITIES FOR IMPROVEMENT

- Could the FRA have reduced deaths and injuries from fires, road traffic collisions or other emergency incidents by using their resources differently?
- Could resources be deployed in a more efficient, effective or economic manner?
- What education, prevention or intervention initiatives might the FRA embark upon in the future?
- Will changes in legislation allow the FRA greater opportunity for improvement?
- Are resources allocated against known risks and priorities?

SERVICE STANDARDS

- Is there any spare capacity within the FRS for new or additional work?
- How effective are prevention, education and intervention based services?
- Against risk. what level of special appliance provision is required?
- Have personnel the required competence to operate within their known or predicted environment?
- How effective are existing safe system of work?
- Are section 13 and 14 provisions in place to ensure interoperability and the best use of resources?

OUTCOME OF PROPOSED CHANGES

- How will the proposed change be managed?
- How will the outcome of the changes be measured?
- How will the FRAs proposals be reviewed and monitored?
- How will the FRA sustain communication with stakeholders throughout the change programme?

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