



Office of the
Deputy Prime Minister
Creating sustainable communities

The 2005/06 Fire and Rescue National Framework Consultation

Response Paper

December 2004



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December 2004

2005/06 National Framework Consultation Response

Government response to Consultation exercise: 2005/06 Fire and Rescue National Framework

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INTRODUCTION

The Office of the Deputy Prime Minister published Fire and Rescue Service Circular 27-2004¹ on 31 August 2004. The Circular invited responses to questions relating to the 2004/05 Fire and Rescue National Framework which was published on 16 July 2004. All responses were considered in drafting the 2005/06 National Framework, which was published today (6 December 2004).

ODPM undertook the consultation exercise according to the Cabinet Office's Code of Practice on Consultation². In order to meet Fire and Rescue Authorities' requests to publish the 2005/06 National Framework in time to inform their budget setting processes the consultation ran for 8 weeks, ending on 26 October 2004.

39 responses were received from a range of individuals and organisations. They can be broken down as follows:

Type of Organisation	Number of responses
Fire and Rescue Authority/Service	26
Regional Management Board	2
Employee Representative	5
Members of the Public	1
Other Stakeholders	5

¹ www.odpm.gov.uk/stellent/groups/odpm_control/documents/contentservertemplate/odpm_index.hcst?n=5317&l=2

² www.cabinet-office.gov.uk/regulation/consultation/code.asp

OVERVIEW

Fire and Rescue Service Circular 27-2004 invited consultees to respond to the following three specific questions in respect of each chapter of the Fire and Rescue National Framework:

- **Is the National Framework clear about the Government's objectives and priorities, what Fire and Rescue Authorities are expected to deliver, and the support the Government will provide? If not, how could it be improved?**
- **Do you agree with the policies set out in each chapter? If not, why not, and what alternative policy would you wish to see instead?**
- **Do you have any comments on the implementation of the policies set out that are of relevance to the National Framework?**

The majority of respondents felt that the National Framework was clear about the Government's objectives and priorities and supported the policies it sets out. Respondents particularly welcomed the Government's decision to align publication of the 2005/06 National Framework with Fire and Rescue Authorities' budget setting processes and its ongoing commitment to consultation. Details of further comments and the Government's response to each are set out chapter by chapter in the table below.

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GENERAL THEMES

	Paragraph	Comment	Response
1		We welcome the broad themes of the National Framework and continue to support modernisation. In particular we welcome the need for greater partnership working in order for Fire and Rescue Authorities to make a valid contribution to both community safety and improving the communities in which they operate.	We welcome these comments.
2		<p>The provision of a Framework and the clarity it provides from central government is very helpful.</p> <p>The strategy set out in the National Framework is the cornerstone for encouraging and driving forward reform.</p>	We welcome these comments.
3		Government's intention, for this first review, to limit any changes is therefore welcome. Indeed, the Forum hopes that there will be no significant additions to the Framework, in view of the current demanding agenda.	We agree with this comment.

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4	<p>There is no clear linkage between the Government aim for the Fire and Rescue Service being to reduce deaths and injuries from fire and the Public Service Agreement (PSA) targets. The PSA target is only about deaths from accidental fires and deliberate fires. Added to this it only relates to fire. The Government aim is reducing death (not just accidental death) and injury from fire. Therefore, to me it is logical that the targets should clearly link to the aims.</p> <p>Additionally in an Appendix it lists the ODPM strategic priorities. It's difficult to see where the Fire & Rescue Service aims fit into these strategic priorities.</p>	<p>There is a clear link between the Government aim to save lives and stop unnecessary injuries and ODPM's PSA target by 2010, to reduce the number of accidental fire-related deaths in the home by 20% and the number of deliberate fires by 10%. We considered including fire-related injuries in the PSA target. However the data currently available for injuries is not appropriate for a PSA because it does not differentiate between serious injuries, which we might consider including in a PSA target, and those less so. The issue of injury classification is currently being considered as part of the wider review of incident data. We will keep all our fire targets under review and consult on any changes.</p> <p>The issue of injury classification is currently being considered as part of the wider review of Fire and Rescue Service incident statistics. It is likely that we will propose the adoption of the road accident statistics classification of serious and slight injuries, a full consultation on this and other aspects of Fire and Rescue Service incident statistics will be taking place before the end of the year.</p> <p>There is a clear relationship between the ODPM strategic priorities and the Government's aims for the Fire and Rescue Service. Indeed the Fire and Rescue Service will make a direct contribution to many of them.</p>
5	<p>National Framework places responsibility for setting priorities on authorities not central government.</p>	<p>The Government is responsible for setting clear objectives for the Fire and Rescue Service. As part of this, it will produce a Fire and Rescue National Framework, and will report to Parliament against it.</p> <p>The National Framework provides a clear and coherent context for the future of the service. It will make clear the Government's expectations for the Service, what Fire and Rescue Authorities must do, and what support Government will provide.</p>
6	<p>National Framework should set out strategic outcomes that provide flexibility to FRAs as to how they should be achieved outcomes rather than a mix of inputs and outcomes.</p>	

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7		<p>The first document was - perhaps understandably in the light of the then industrial relations climate, and the previous lack of direction from the Home Office - very detailed. As a result it is more detailed than we would expect for a document giving strategic direction, and so too long. As we jointly work through the White Paper agenda and deliver on it, we hope that in later years the Framework will be less prescriptive.</p>	
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8		<p>The National Framework should be published to cater to the business process of the modern Fire and Rescue Service. In this case by June 2005.</p> <p>The draft National Framework should be published for consultation before the date by which draft IRMPs would have to be published for consultation, and the actual National Framework is published before fire and rescue authorities need to set their budgets.</p>	<p>We completed the consultation exercise for the National Framework on 26 October. We published the 2005/06 National Framework on [date] in time for FRAs' budgeting processes.</p> <p>In future we aim to publish the National Framework in the Autumn in time to meet FRAs' budgeting processes. This will follow full consultation on a draft National Framework, following Cabinet Office consultation guidelines.</p>
9		<p>Outcomes of the current National Framework will need to be considered before any future National Frameworks are published.</p>	
10		<p>The timeline for consultation needs to be cleared. Summer is too broad a definition. Ideally, and allowing for a 12 week consultation period the process needs to start by no later than 1st June in each year. IRMP and financial planning will already be underway by the close of the consultation period.</p>	
11		<p>The National Framework needs to ensure that the Retained Duty System (RDS) is at the forefront of every new initiative, rather than being forgotten or tacked on the end as an afterthought.</p>	<p>The Retained Review Team's report stressed the importance of fully integrating retained duty system personnel at every level and in every aspect of the Fire and Rescue Service. We aim to do this.</p>

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<p>12</p>		<p>Whilst we welcome the freedoms given within the Fire and Rescue Services Act 2004 (2004 Act) - such as local risk management - we are concerned that in other areas the Government is taking an ever more prescriptive role.</p> <p>Alongside other sections of local government we would like to see Fire and Rescue Authorities being given greater freedom to deliver services in their communities to achieve an agreed set of outcomes. To this end we would recommend that Fire and Rescue Authorities be given the opportunity to be included in the Local Public Service Agreements (LPSAs) programme and that all Fire and Rescue Authorities be given the 'Well Being Power' that local authorities were given some time ago.</p>	<p>The issue of applying the power of well being to Fire and Rescue Authorities was considered in detail during the passage of the Fire and Rescue Services Act 2004 (2004 Act). The Act gives all Fire and Rescue Authorities clear powers to work in partnership with other agencies to tackle risks faced by their local communities, for example as identified in its Integrated Risk Management Plan (IRMP). It also enables them to deploy their employees or equipment 'for any purpose that appears to the authority to be appropriate'. This gives Fire and Rescue Authorities considerable discretionary powers to undertake a wide variety of activities. We are not aware of any activities that Fire and Rescue Authorities have wanted to undertake which have not been possible under this power.</p> <p>County Fire and Rescue Authorities have the power of well being because they are the service delivery department for the principal local authority for the area, which is directly elected to provide community leadership on a large variety of issues.</p> <p>With regard to LPSAs, we are not aware that any Fire and Rescue Authorities have had difficulty joining an LPSA programme where they have desired to do so.</p>
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13		<p>Time will be required for Fire and Rescue Authorities to build the capacity required to achieve the outcomes required by the National Framework. Many Fire and Rescue Authorities are facing restricted budget provisions that will 'slow' down the ability to deliver the required changes in the short-term. Capacity and funding levels require FRAs to prioritise objectives.</p>	<p>The Government has long recognised that there may be a lag between costs and savings of fire and rescue service modernisation. That is why, at the LGA's request, we paid £30 million transitional funding to English and Welsh Fire and Rescue Authorities in 2004/05. Originally the Government planned to recoup the transitional funding before the end of 2005/6. But we have recognised that there have been delays in the pay and modernisation process and that, amongst other things, this could mean that we were seeking to recoup the transitional funding less than a year after it had been distributed to authorities. The LGA therefore suggested that the recouping of the transitional funding be deferred until 2006/07. The LGA and Fire and Rescue Authorities have provided evidence to support their case, including on efficiencies to be delivered for 2006/7. We have therefore agreed to meet the LGA's request. This is reflected in the 2005/06 provisional government settlement, which provides Fire and Rescue Authorities with an average grant increase of 3.7%. No authority will get an increase of less than 2.5%..</p>
14		<p>It would be helpful if details of the Fire Service Improvement Team projects could be provided along with completion dates, with regular updates provided via the Fire and Rescue Service Circulars.</p> <p>It would also be helpful to have details of the work which ODPM intends to undertake with other Government Departments as part of the now wider role of Fire and Rescue Services.</p>	<p>The National Framework provides a summary of what we expect of authorities and what ODPM will do. Where necessary we will update the National Framework by Fire and Rescue Service Circular.</p> <p>An updated milestone map is currently under preparation. It will be available on the ODPM website at www.odpm.gov.uk in the New Year</p> <p>However, it is not possible to detail ODPM's contact with other government departments concerning the Fire and Rescue Service. It may be possible to deal with queries regarding specific issues.</p>
15		<p>A tabular summary of key objectives and expectations would emphasise the contractual nature of the National Framework.</p>	
16		<p>A description of the relationship between ODPM and LGA would also be helpful.</p>	<p>The ODPM is a Government department. As such it independent of, but keeps in close contact with all its stakeholders, including the LGA, which represents Fire and Rescue Authorities.</p>

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17		We would welcome a three-year life span cycle for the Framework as occurs with the National Policing Plan. This would greatly help medium term planning.	We acknowledge the importance of clear direction for Fire and Rescue Authorities for planning purposes. The Fire and Rescue Service Act 2004 says "The Secretary of State must keep the terms of the Framework under review and may from time to time make revisions to it".
18		The National Framework is a mixture of both short and long-term objectives. It would be far more practical to structure these objectives in such a way that they could be clearly linked to a medium-term financial strategy acknowledging that some are deliverable over the medium-term and some need to become longer term objectives.	
19		There is a lack of reference to Fire and Rescue Service Staff (FRSS), i.e. non-firefighters, in the National Framework	Staffing issues within the National Framework, particularly the work streams relating to HR provisions in Chapter 5, are inclusive of all Fire and Rescue Service Staff except where explicitly stated otherwise e.g. where the issue under consideration relates to a specific sector such as fire control staff or those working on the retained duty system. However, we note this comment and in redrafting we will both ensure there is greater clarity and reassess whether there are some specific issues which need to be highlighted in relation to these members of staff.
20		It is important that the language used is inclusive - essential if Authorities are to gain the support of all involved. For example, we would ask that a new title is found for "non-uniformed staff";	We agree that the language used should be inclusive. The 2004/05 revised text removed references to non-uniformed staff and replaced them with references to all staff in order to convey the sense of inclusiveness and the message that the whole modernisation agenda applied to all staff working for Fire and Rescue Authorities in whatever role. We have therefore drafted the 2005/06 National Framework to convey more effectively the inclusion of all staff.

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21		<p>A more ambitious strategy to mainstream the Fire and Rescue Service's contribution to the broader public service strategies of inclusion, cohesion and sustainability is not as prominent we would wish to see in a future National Framework.</p>	<p>The National Framework has a statutory purpose, and therefore focuses on those matters where the Fire and Rescue Service has a specific lead, usually those for which it has statutory duties under the Fire and Rescue Services 2004. The policies set out in the National Framework do however contribute directly to greater inclusion, cohesion and sustainability.</p>
22		<p>Reference is made in the Framework to Project Boards. If they are to be integral to the process the role they play and their level of accountability need to be much better publicised. At present there is a worrying lack of transparency.</p>	<p>Project boards are there for internal ODPM management purposes. The National Framework sets out government's expectations and support, rather than processes. All references to project boards will therefore be deleted from the 2005/06 National Framework.</p>
23		<p>We have concerned over the centralising nature of the National Framework and the Fire and Rescue Services Act 2004. Together, whilst they have many desirable features, they undermine the ability of local Fire and Rescue Authorities to make local decisions in the interests of local communities. It is clear to this Board that the Government is moving towards a regional Fire and Rescue Service, something to which this Board is opposed.</p>	<p>The Government is not regionalising the Fire and Rescue Service, but has made clear that were voters to decide in a referendum for an Elected Regional Assembly a Regional Fire and Rescue Authority would be established. Elsewhere, however, the National Framework encourages voluntary regional collaboration to secure greater economy, efficiency and effectiveness and enhance public safety. Fire and Rescue Authorities remain accountable to their local communities for the decisions they make in co-operation with other authorities, as well as for their own IRMPs. Only where these voluntary arrangements fail will the government consider using its powers to combine FRAs.</p>

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24		<p>National projects will impose ongoing costs upon Fire and Rescue Authorities at a time when Government is seeking to unrealistically constrain Fire and Rescue Authority funding.</p>	<p>The ODPM is investing heavily in the Fire and Rescue Service, in particular through national projects, including Firelink, New Dimension and FiReControl. For example, the 2005/06 National Framework includes the additional £16 million for crewing, as announced at Fire 2004.</p> <p>Where Fire and Rescue Authorities make a case that ODPM has imposed any additional costs, ODPM will consider recompensing Fire and Rescue Authorities according to the new burdens principles. Where a central government department's policies or initiatives increase the cost of providing local authority services, the 'new burdens' principle means that Government will fund the additional expenditure, provided that the aggregate value of the burdens in any financial year across all FRAs in England is greater than £100,000.</p>
25		<p>Many of the comments made in response to the previous consultation remain valid and responses to them appear measured and considerate, which goes some way to alleviating concern. It is refreshing to see this amount of commitment to consultation.</p>	<p>We welcome this comment.</p>
26		<p>We believe the 2004/05 Framework is unclear about the objectives of the Fire & Rescue Service, and Fire and Rescue Authorities within that. The new fire Public Service Agreement applies only to England.</p>	<p>We disagree, and have received no other similar comment. In fact most responses have commented on the clarity of the National Framework (see item 2 above).</p> <p>It is correct that both the PSA target and National Framework apply only to England.</p>

CHAPTER 1 - RISK MANAGEMENT & PREVENTION

	Paragraph	Comment	Response
1	IRMP	By not being overly prescriptive, the Framework encourages Fire and Rescue Authorities to develop individual solutions for the often-unique risk based problems, which they all have to contend with.	We welcome this recognition of the flexibility afforded to Fire and Rescue Authorities by the IRMP process.
2	1.1	The Government priorities and targets are set out by reference to the PSA target. However, should the targets be dynamic to reflect the ageing population?	The PSA target already reflects the fact that the over-60s are the most at-risk group in terms of accidental dwelling fire deaths and that this section of the population is due to grow most rapidly over the next decade.
3	Integrated Risk Management Plans (IRMPs)	National Framework should include a common approach to corporate risk management to allow priorities to be based on the overall risk environment not just IRMPs.	The Government requires all Fire and Rescue Authorities to produce an IRMP. IRMPs replaced the outdated national standards of fire cover. They reflect local needs and set out plans to tackle effectively both existing and potential risks to communities, in partnership with neighbouring authorities and other agencies.
4	IRMP	The requirements as set out in paragraph 1.3 of the 2004/05 Framework are not supported by any reference to Government objectives.	
5	IRMP	The timetable for IRMPs does not fit with that for a variety of issues ranging from Budget to Best Value Performance Plans (BVPP).	We are aware of this inconsistency and are taking steps to align the BVPP cycle with that for IRMP and budget setting.
6	IRMP	A newly established Implementation Support Team (IST) continues to provide useful feedback relating to acknowledged 'best practice'	The work of the IST has been appreciated by authorities across the country. The IST was intended as an interim resource and is not expected to continue into 2005/06.

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7	IRMP	We believe that the checks and balances need to be strengthened in relation to IRMPs. Consideration should be given to the "calling in" of IRMP's for central scrutiny where necessary.	IRMP guidance note 1 makes clear the need to consult ODPM when a draft IRMP becomes available. Although we will not be providing feedback to Fire and Rescue Authorities this year on the content of the plans, an assessment will be undertaken for ODPM use. This will also serve to identify where Fire and Rescue Authorities fail to engage fully with the efficient and effective deployment of resources.
8	IRMP	For the purpose of clarity much of the introductory background material on Integrated Risk Management Plans (IRMPs) is now historical and could be removed.	We accept this comment and will remove paragraph 1.2. Subsequent paragraphs remain relevant as they make clear the expectations placed on Fire and Rescue Authorities in respect of the content of their IRMP.
9	IRMP	<p>The development of regional controls should cause a review of the current approach to the development of individual authority based Integrated Risk Management Plans. It makes sense to encourage a collaborative approach to the development of such plans whilst acknowledging the importance of developing local solutions to local problems.</p> <p>There should there be an explicit expectation of regional delivery of fire and rescue services based on central government direction.</p>	<p>Authorities are already encouraged to collaborate with their neighbours in developing more efficient and effective arrangements for response, training, outreach and internal management. Greater co-operation would be welcomed, and ODPM is following with interest the work being done by the Chief Fire Officers' Association (CFOA) on this. However, the obligation to produce an IRMP remains with individual Fire and Rescue Authorities.</p>
10	1.6 - IRMP	The minimum period for consultation on the IRMP should be reduced to six weeks or, at most, eight weeks.	The consultation period must be long enough to allow stakeholders to engage with the Authority, particularly where significant changes are proposed. 12 weeks for consultations by central government is recommended by Cabinet Office guideline.

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11	1.7 - IRMP	<p>We are concerned that, in real terms, the rate of improvements and efficiency savings will not be what the Government anticipates.</p> <p>The Government should appreciate that the support provided in terms of the Fire Service Emergency Cover (FSEC) 'Toolkit' and the associated data cleansing exercise has yet to contribute to the IRMP process to the extent that was anticipated.</p>	<p>We have long recognised that there may be a lag between costs and savings of fire and rescue service modernisation. That is why, at the LGA's request, we paid £30 million transitional funding to English and Welsh Fire and Rescue Authorities in 2004/05. It has taken longer than was originally envisaged to put some key building blocks in place, including the final pay and conditions deal. This meant that payment of the transitional funding was later than expected. The key issue is whether modernisation, including efficiency savings, will be delivered and more lives are saved as a result. Considerable progress has been made but it is essential that further efficiencies and service improvements are delivered as soon as possible. In view of all this, and the LGA's assurances that if repayment is deferred for a year "progress can be made whilst avoiding unreasonable costs to the council tax payer", the Government has agreed the LGA's request that we will now recoup the transitional funding in 2006/7.</p> <p>This is reflected in the provisional 2005/06 local government finance settlement, which provides Fire and Rescue Authorities with an average grant increase of 3.7%. No authority will get an increase of less than 2.5%.</p> <p>Sir Peter Gershon's efficiency review that formed part of SR04 aims to 'ensure that frontline staff get the resources they need to do their job even better, and that the bureaucracy that can get in their way is removed'³⁵. The aim is to ensure that maximum use is made of increased investment. The principles apply equally to central government and Fire and Rescue Authorities. Local Government as a whole has been set a target of achieving £6.45 billion in efficiency gains by 2007/08. Fire and Rescue Authorities have a part to play in helping local government to meet that target. ODPM has assumed within its own efficiency target that English Fire and Rescue Authorities together will achieve £105m gross efficiency savings in 2007/08. This would amount to a gross efficiency saving equivalent to around 5% of total 2004/05 expenditure. This will need to be achieved by the end of financial year 2007/08. More detail is given in ODPM's efficiency target's Technical.</p> <p align="center">Page 15 of 73</p> <p>Fire and Rescue Authorities received guidance in March 2004 on the use of FSEC to inform this year's IRMPs. While FSEC could not have been used to full effect by the time consultation opened on this year's IRMPs, it</p>
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12	1.9 - IRMP	Section 1.9 implies that IRMPs are intended to focus on patterns of response. This term is confusing and speed, weight or type of response might be more appropriate.	We have noted this comment and will reflect it in the 2005/06 National Framework.
13	IRMP	Separate sections seem to imply that community fire safety and arson reduction as separate issues to IRMPs. We consider these to be control strategies that are a part of IRMP.	We have noted this comment. We will ensure that we recognise these workstreams as part of the wider IRMP process in the 2005/06 National Framework.
14	IRMP	We have serious concerns that the PSA target focuses on deaths in domestic fires. An IRMP should go much further than this ("reduce the <i>commercial, economic and social</i> impact of fires") and take account of the effects of fire on local businesses.	IRMPs already recognise the impact on the economic well being of the community. However, the explicit emphasis on deaths is a deliberate attempt to redirect resources towards reducing risk to life after decades of national standards based on property. IRMP guidance note 1 stated that the process would involve "shifting the focus in planning to put people first" and "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". We believe this is consistent with Fire and Rescue authorities duty to make provision for protecting life and property in the event of fires and to promote fire safety.

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15	1.13 - Community Fire Safety	<p>Additional funding is required to maintain standards in pockets of deprivation in rural areas. This should be funded centrally.</p> <p>The funding arrangements also fail to acknowledge the ageing population. Here input needs to be increased if we are to influence people to ensure they are safer in the future - an invest to save strategy.</p>	<p>Financial support for FRAs is given through the revenue support grant, and its distribution through the Fire Formula Spending Share (FSS) mechanism takes account of deprivation, through the fire risk index. It is for Fire and Rescue Authorities to allocate funding in accordance with their IRMP.</p> <p>The Government has recognised that the costs and savings of modernisation may fall unevenly across Fire and Rescue Authorities. The Government has therefore asked a working group of officials, including the Local Government Association (LGA) and representatives from Fire and Rescue Authorities, to examine the case for change and possible alternatives to the existing FSS that might better reflect Fire and Rescue Authorities' needs. The Government will consider proposals for changes to the formula in the light of the working group's conclusions. Any changes to the formula would come into effect for 2006/07 at the earliest.</p> <p>In addition, to give extra support to meeting the PSA accidental fire deaths target we have given Fire and Rescue Authorities with a fatality rate above the average a one-off increase in resources in the period 2003-06 through the Community Fire Safety (CFS) Innovation Fund. We have also provided capital grants to Fire and Rescue Authorities to install free smoke alarms with 10-year batteries and automated fire suppression systems associated with Home Fire Risk Checks (HFRCs) targeted on the most vulnerable households. Research suggests that the over-60s are the most at-risk group in terms of accidental dwelling fire deaths).</p>
16	1.17 Community Fire Safety	Home Fire Safety Checks and smoke alarm provision should be centrally funded.	Promotion of fire safety is a statutory duty of Fire and Rescue Authorities and is therefore a mainstream activity to be funded through revenue support grant and council tax. Nevertheless we agree that a push is needed and have therefore recently announced a £25 million initiative to provide capital grants to all English Fire and Rescue Authorities for the four years to March 2008 to install free smoke alarms with 10-year batteries and automated fire suppression systems, associated with. Home Fire Risk Checks targeted on the most vulnerable households.

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17	1.17 Community Fire Safety	Welcome emphasis on CFS	We welcome this support.
18	1.17 Community Fire Safety	The acknowledgement of a 'perverse incentive' or 'inequitable distribution of funding' does nothing to reduce funding problems.	<p>Poor households and deprived communities are most at risk from fire. That is why the PSA target on accidental fire deaths includes a floor element - to ensure that no Fire and Rescue Authority area suffers deaths more than a quarter above the average by 2010. Most funds for Fire and Rescue Authorities are distributed through the FSS of the revenue support grant. But to give extra support to meeting this target we have given Fire and Rescue Authorities with a fatality rate above the average a one-off increase in resources in the period 2003-06 through the CFS Innovation Fund. In distributing the grant, there has to be a balance between equity and directing money where it is most needed.</p> <p>We also recently announced a £25 million initiative to provide capital grants to all English Fire and Rescue Authorities for the four years to March 2008 to install free smoke alarms with 10-year batteries and automated fire suppression systems associated with Home Fire Risk Checks targeted on the most vulnerable households.</p> <p>The provisional 2005/06 local government finance settlement, provides Fire and Rescue Authorities with an average grant increase of 3.7%. No authority will get an increase of less than 2.5%. In the circumstances this represents an excellent settlement.</p>

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19	1.17 Community Fire Safety	It is essential that all fire safety issues are absorbed into the general programme and plan of action for regeneration, neighbourhood renewal and community cohesion.	<p>The new Safer and Stronger Communities Fund announced in the Spending Review 2004 will be rolled out across all local authorities in England from April 2005, and a total of £660 million will be available in the three years up to March 2008.</p> <p>The programme brings together all the existing ODPM funding streams on neighbourhood wardens, neighbourhood community empowerment and liveability, and the Home Office funding streams aimed at building safer communities and addressing anti-social behaviour, together with the funding available through Government Offices according to need and national priorities.</p> <p>The Government will set high level national priorities for the fund drawing on LPSAs and other targets but the fund will be administered as mini Local Area Agreements (LAAs) with the intention of devolving decision making to those at local level.</p>
20	1.17 Community Fire Safety	<p>The term Community <u>Fire</u> Safety should be broadened to 'Community Safety' to reflect the possible activities the Fire and Rescue Service could provide in reducing, for example, road traffic accidents or contributing to water safety.</p> <p>We would welcome increased formal recognition of the role of Fire and Rescue Authorities in building community cohesion and greater clarity as to the expected role and level of responsibility of Fire and Rescue Authorities within Community Safety Partnerships.</p>	<p>The 2004 Act establishes a new framework of powers and duties that provide a clear statement on Fire and Rescue Authorities' new role. This strikes a balance between a series of core duties that all Fire and Rescue Authorities must provide for and discretion for individual Fire and Rescue Authorities to respond to local risks and priorities identified, for example in their IRMP.</p> <p>The 2004 Act therefore ensures that the Fire and Rescue Service can make an efficient and effective contribution to helping make communities safer. In doing so it recognises that other aspects of public safety are matters on which other emergency services and agencies rightly lead but there is still a place for the specific term.</p>

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21	1.18 - Arson Reduction	It is unclear as to how the Fire and Rescue Authorities' efforts will be reflected in figures for arson, which are returned by police authorities. This may be attributed to low clear up rates and an adverse impact on overall crime figures.	<p>The PSA target is based on the number of deliberate fires recorded by FRAs. Research on common terminology and agreed recording mechanisms is in hand.</p> <p>Firefighters and police officers already work together at a local level through dedicated arson task forces, many of which are funded by the Arson Control Forum. Fire and Rescue Authorities were made Responsible Authorities within Crime and Disorder Partnerships with effect from 1 April 2003, enabling the Fire and Rescue Service to make an effective contribution to local crime and disorder strategies, including raising the profile of arson.</p>
22	1.20 Youth Engagement	Consideration should be given to central funding of youth work.	Some youth intervention/youth diversion work is already funded through one-off grant payments made by the Arson Control Forum. But we see this sort of activity as a core duty within the new framework of powers and duties set out in the 2004 Act and for which all Fire and Rescue Authorities must provide - in accordance with local risks and priorities, as identified, for example, in an IRMP.
23	1.20 Youth Engagement	We recommend that future policy and direction in this area should be channelled through organisations such as the Fire Service Youth Training Association (FSYTA).	In common with other types of crime and anti-social behaviour, most arson is committed by a minority of prolific offenders, many or most of whom are under 18 and also commit other offences. This is why the Arson Control Forum Council is developing a new work programme, focussing on youth work and neighbourhood improvement. The funding of the FSYTA is under review.

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24	1.25 Building Regulations	We believe very strongly that the ODPM should provide additional support and weight in the National Framework by supporting/promoting the fitting of sprinklers in schools, residential homes and commercial/industrial buildings.	<p>The fundamental review of the fire safety aspects of the Building Regulations and Approved Document B (AD B) is underway. It is considering fire safety in all types of buildings, including dwellings, residential care homes, schools and warehouses, taking into account recent research and experience. Any changes to Building Regulations and AD B will need to be justified in a Regulatory Impact Assessment (RIA).</p> <p>We recognise the benefits sprinklers can offer but they are not a panacea. The review is therefore considering the role that sprinklers could play as part of a package of fire safety measures. Specifically in relation to schools, we understand that DfES are shortly to go out to consultation on a new draft Building Bulletin (BB100) on 'Designing and Managing Against the Risk of Fire in Schools', which will consider the issue of sprinklers in schools. A draft AD B, incorporating proposed changes, including further guidance on the role of sprinklers, is expected to be published for public consultation in Spring 2005, together with the draft RIA. The consultation package, will include the proposed timetable for implementation.</p> <p>(response continues over page)</p>
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25	1.27 - Building Regulations	<p>The consultation paper on sprinklers (Section 1.27), promised by Spring 2005, should be published along with a timetable for proposed implementation of changes to Building Regulations. Measures to require sprinklers in certain residential premises and all new and materially altered schools are much needed.</p>	<p>In relation to existing premises and encouraging improved fire precautions, we recently announced a £25 million initiative to provide capital grants to all English Fire & Rescue Authorities for the four years to March 2008 to install free smoke alarms with 10-year batteries and automatic fire suppression systems associated with Home Fire Risk Checks targeted on the most vulnerable households.</p> <p>Similarly, a project studying the design and effectiveness of low cost sprinkler systems for dwellings with funding of £100,000 is underway in ODPM. This will draw on work on low-cost fire suppression systems in other countries. The project will include a cost benefit analysis (for all dwellings and for targeted installation aimed at vulnerable groups) and a practical study of sprinkler effectiveness in reducing casualties. Subject to a satisfactory outcome of this project, low cost systems based on the work may become available and facilitate further take-up in new and existing housing.</p>
26	1.27 - Building Regulations	<p>Whilst we support the Government's moves to change part B of the Building Regulations to include sprinklers in some of the most at risk properties, we feel that it needs to go further and promote the inclusion of sprinklers in all buildings, and in particular schools and all HMOs. If the Government is serious about improving fire safety it would support many Fire and Rescue Authorities request for sprinkler installation as a statutory requirement in Building Regulations.</p>	

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27	1.27 - Building Regulations	<p>We welcomed the recent Regulatory Reform Order that reforms general fire safety legislation and gives Fire and Rescue Authorities responsibility for fire safety within all non-domestic properties. However, due to the rules surrounding RRO legislation there are still ambiguities over the licensing and fire safety inspection of HMOs. We appreciate the RRO cannot change legislation less than 2 years old, such as the Housing Bill. There must be clarity on the co-ordination of this work between housing departments and Fire and Rescue Authorities.</p>	<p>We agree that there needs to be co-ordination on the fire safety inspection of HMOs. Guidance on the co-ordination between Fire and Rescue Authorities and housing departments on inspection of HMOs is being prepared by those responsible for the RRO and for the Housing Bill. Also, both the RRO (Fire Safety) and the Housing Bill contain requirements for consultation between Housing and Fire and Rescue Authorities prior to any enforcement action being taken in respect of HMOs.</p>
28	1.28 - Building Regulations	<p>With the growth of CFS the Service's expertise in this area is likely to decline. Is our involvement as necessary as it once was?</p>	<p>We see a continuing role for the FRS in relation to Building Regulations. This work will be complementary to and will build on the Community Fire Safety work by the FRS. Where a building is put to a relevant use, particular those buildings to which the public has resort, the building control authorities are required to consult with the FRS regarding the fire precautions that will be necessary to meet the legislation that will apply to the building once it is in use. This is to allow them to reach mutually compatible views on whether plans & building work are satisfactory from the standpoints of the Building Regulations and fire precautions legislation. This is in order to avoid additional building work at the end of the building project before the building can be occupied for its intended purpose</p>
29	1.30 RRO	<p>Need to confirm as soon as possible when the RRO will be enacted.</p>	<p>Noted</p>

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30	1.30 RRO	The Government should robustly launch RRO to the business community. Any programmes promoting fire protection systems should be re-evaluated.	We agree. ODPM is planning a co-ordinated publicity campaign to raise awareness of the Regulatory Reform Fire Safety Order (RRO), targeting in particular Small and Medium-sized Enterprises (SMEs). This will include a direct mail to all registered businesses, a series of seminars, a radio campaign and articles in the business press. The campaign will support a suite of guidance documents including a free, quick risk assessment guide aimed at small to micro businesses. The content of the campaign has been developed with interested stakeholders, including the Association of British Insurers (ABI).
31	1.30 RRO	We are supportive of the proposed Regulatory Reform Order but urge caution with the total removal of fire certification processes.	The proposals contained in the draft RRO were subject to a full consultation procedure, and are currently undergoing detailed Parliamentary scrutiny. Ministers took into account all the points made during the consultation period, and are currently considering the matters raised by the Parliamentary Committees concerned.
32	1.34 Crown Premises	The policy is appropriate.	We welcome this comment.
33	1.34 Crown Premises	We would welcome the inclusion of a stronger commitment by government to better management of automatic detection equipment in Crown property, particularly prisons.	In all Crown premises subject to the Fire Safety (Workplace) Regulations, the employer must ensure that all installations provided for the safety of persons at risk are properly maintained in a good working order. Fire certificates issued to Crown premises subject to the Fire Precautions Act also impose a duty to maintain automatic equipment in good working order. The National Framework states that the Government will support and promote the focus on prevention by continuing to encourage safe behaviour in Crown Premises. The Government also states that it remains committed to ensuring full compliance with the requirements of health and safety law and best practice. Crown fire inspectors reinforce this commitment and encourage the adoption of good practice when inspecting premises.

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34	1.34 Crown Premises	Fire and Rescue Authorities should enforce fire safety legislation applicable to Crown premises. To continue to employ two separate organisations is wasteful.	The issue of day-to-day enforcement responsibility will be addressed when a suitable vehicle for removing Crown immunity from fire safety legislation is identified. There will be a continuing need for central expertise to ensure government maintains exemplary standards in Crown occupied premises.
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CHAPTER 2 - WORKING TOGETHER: THE REGIONAL APPROACH

	Paragraph	Comment	Response
1	2.4	We would urge caution in the extent to which London Fire and Emergency Planning Authority (LFEPA) London can be used as an example of regional activity.	We note and agree with this comment.
2		A fully costed, transparent business case should be developed to demonstrate that there are real and tangible efficiency savings to be made from a regional approach.	The Independent Review of the Fire Service report concluded that significant savings could be achieved through regional collaboration. RMBs are already developing robust business cases in the six areas identified in the White Paper.
3		We see the establishment of Regional Management Boards (RMB) as a major step forward.	We welcome this comment.
4		<p>The LGA has always argued that voluntary regional collaboration is more effective in delivering service improvements than regionalisation and where voluntary regional arrangements can be proven to deliver then they should continue to exist.</p> <p>Unless a thorough business case proves otherwise, there is no reason why a Regional Fire and Rescue Authority will be more effective than the continuation of the existing individual Fire and Rescue Authorities within the regional structure.</p>	The Government made clear that only in regions which voted for an Assembly would there be a regional Fire and Rescue Service. Elsewhere, voluntary regional arrangements would be the mechanism to deliver greater economy, efficiency and effectiveness and enhanced public safety. Only where these arrangements fail will the government consider using its powers to combine FRAs. Such combinations could occur along sub-regional lines, should this be considered the best solution.

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5	2.9	The mechanisms for reporting progress achieved by Regional Management Boards should be standardised and streamlined to facilitate benchmarking and the sharing of best practice.	The Government will consider this point when deciding on the nature and content of any future progress reports.
6	2.9	Does this mean all Fire and Rescue Authorities within the region have to be poorly performing, or just one will invoke the use of Government powers? How does the improvement planning process from CPA link to this? This infers 'one strike and you are out'	<p>The Government will make a judgement on the basis of the evidence available, regarding individual and joint performance from all authorities across the region, about appropriate measures to support the achievement of key national objectives for the Service. Any measures taken, including the use of powers to combine authorities, would be appropriate to circumstances and proportionate to the evidence.</p> <p>You will have noted from consultation on post-CPA improvement planning proposals, contained in FSC 28/04, that we envisage holding a round-table discussion with each RMB. This will be in addition to individual FRA improvement planning round-tables, and is intended primarily to review progress on the issues for co-operative delivery through the RMB. We would expect this to follow the publication of all CPA outcomes for English FRAs in July, which, while not assessing RMBs directly, collectively will clearly provide an important source of additional independent evidence on progress and performance.</p>
7	2.10 - Functions of RMBs	Given the composition of the Practitioners' Forum, it may be prudent to allocate tasks to 'lead' regions who would facilitate 'task and finish' groups (one representative from each region) to produce a regional framework for each of the key areas (at paragraph 2.10). These could be customised for adoption by each of the remaining 8 Regions.	The Government does not wish to prescribe in detail how RMBs should undertake their work by formalising a "lead region" approach. Each region will have distinctive issues facing it. However, there may clearly be areas of commonality between RMBs on various issues, and RMBs could usefully share best practice between themselves.

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8	2.10 - Functions of RMBs	We are concerned about the variety of governance arrangements for Fire and Rescue Authorities, particularly in light of the development of and delegation of powers to Regional Management Boards.	These are matters to be settled between Fire and Rescue Authorities through an agreed constitution. To date RMBs do not appear to be finding the problems insuperable.
9	2.10 - Functions of RMBs	The size of the North West area means that collaboration in many aspects of fire investigation would be impractical.	It is for RMBs to ensure a sensible balance is struck.
10	2.10 - Functions of RMBs	We believe the six items listed at paragraph 2.10 will be assisted by a regional approach. Once again there is a need to prioritise the objectives given current funding provided to Fire and Rescue Authorities and the Government's desire to constrain council tax increases.	We welcome this comment. The Government believes Fire and Rescue Authorities have been served well by recent financial settlements and transitional funding. Efficiencies from greater collaboration will further help in keeping council tax increases to a reasonable level.
11	2.10 - Functions of RMBs	Consideration needs to be given to 'local' needs, in particular regarding training provisions.	It is for RMBs to ensure a sensible balance is struck, and that local provision, particularly for those with domestic responsibilities forms part of any regional training strategy.
12	2.10 - Functions of RMBs	The savings resulting from a regional approach may not be those anticipated where specific regional variations are apparent.	The Government believes there are benefits to be gained in areas such as procurement, HR and training whatever the urban/rural mix.
13	2.10 - Functions of RMBs	As each region has different geographical and social circumstances, we recommend that the collaboration on special or common services remains determined by each Regional Management Board, rather than prescribed by national government.	The Government is not prescribing in detail how Fire and Rescue Authorities should collaborate on these issues. The National Framework suggests they should have regard to the model protocol on fire investigation.

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14	2.10 - Functions of RMBs	There are some additional areas in which Fire and Rescue Authorities working in isolation may not have the capacity to provide an efficient and effective service. For example, expertise in fire engineering.	The Government welcomes further collaboration in any areas where Fire and Rescue Authorities identify the potential for savings or a better service. The six areas referred to are those identified as key by the Government, and therefore it does not intend to add to the list in the Framework, leaving additional areas for local discretion.
15	2.10 - Functions of RMBs	We remain concerned that administrative burdens of RMBs are proportionate to the benefits gained.	We agree with this comment. The Government expects RMBs to be light touch and delivery-oriented.
16	2.10 - Functions of RMBs	Guidance for Regional Management Boards on the six strategic areas have often failed to meet the published deadlines, this makes it difficult to take forward regional policies and also for RMBs to be realistically measured on their performance.	We acknowledged this point in paragraph 2.9 of the 2004/05 National Framework. We agree that RMBs cannot be expected to make progress if key guidance is unavailable.
17	2.10	Training and HR should constitute one workstream.	We disagree. The Government sees these as distinctive, if inter-related, functions.
18	2.16 - RCCs	The longer term benefits of Regional Control Rooms are clear in terms of resilience and providing an effective command and communication centre for dealing with larger scale incidents like widespread flooding, foot and mouth or other civil protection issues within the region.	Agreed
19	2.10 - RCCs	Acknowledgment of the tension between local delivery of IRMPs and regional fire controls is helpful, but we note that the promulgation by government of good practice guidance must be timely and comprehensive.	We agree.

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20	2.16 - RCCs	<p>We still have major concerns about regional control rooms, particularly over the pace and timetable of the project. Central government is committing itself to a critical programme of high-risk projects and expecting Fire and Rescue Authorities to commit also, months before the Outline Business Case has even been approved.</p>	<p>The pace of the project is dictated by the need to fit in with the Firelink timetable, the need to remove uncertainty for staff and the need to replace old system in many existing control rooms. We have now gone out to tender for the RCC accommodation, and the timescale for build and fit-out of the centres will determine the timing of FiReControl roll-out.</p> <p>Though challenging, we believe the project timetable is achievable. The National Framework will set out the timetable.</p> <p>An Outline Business Case has been prepared which shows, on the basis of FRAs own financial returns that Regional Control Centres will lead to a reduction in control costs by around 30% once in steady state. The Outline Business Case was reviewed, in confidence, by RMB chairs and their advisers on 3rd November. A revised version, with commercially sensitive information removed, has been circulated to all FRA Chairs and treasurers.</p> <p>The intention at this stage is to consult on the principles and arguments within the business case rather than seeking approval for the figures, many of which will be provisional pending the conclusion of the procurement process. If, in developing the full business case, there are changes to either the logic or structure of the argument, we will seek further views and comments in confidence.</p>
21	2.16 - RCCs	<p>It is still not clear what financial support is to be provided in relation to the transition from existing to new regional controls.</p> <p>The definition of the 'New Burdens' stated in the National Framework is ambiguous and places increased uncertainty on the authorities' future budgetary arrangements.</p>	<p>Support for net additional costs during transition, including retention and redundancy costs, will be considered under new burdens principles.</p> <p>We will be looking to make early notification of the additional funding for FRAs.</p> <p>It is likely that the mechanism for funding new burdens will be a grant.</p>

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22	2.16 - RCCs	<p>There are clear concerns about the lack of detail surrounding what duties the Regional Control Centres will fulfil over and above the response and mobilisation of resources to incidents. Existing local control rooms undertake a wide range of other essential tasks.</p>	<p>Work on the processes to be undertaken by RCCs has been clearly defined in consultation and agreement with the regions. This covers both new and existing functions. A limited number of functions inappropriate to control room operation were identified in some authorities. .</p>
23	2.16 - RCCs	<p>There is increasing local community and political concern about the Regional Control Room's operational capability and the lack of local topographical knowledge.</p>	<p>Local knowledge, though sometimes helpful, already plays a very minor role in the operation of a modern Fire and Rescue Service control room. It has not been relied upon since the introduction of computerised gazetteers in the 1980s removed the requirement for operators to memorise locations. Information on topographical knowledge should be incorporated into the databases where it is available accurately to all. The new RCCs will employ advanced technology, not available to the majority of brigades because of cost or compatibility problems. EISECS (or similar) technology will identify caller location from both fixed and mobile phones, while an Automatic Vehicle Location System (AVLS) will give the location of the most appropriate available personnel and appliances. The Mobilising and Resource Management System (MRMS) will use this, along with the knowledge database in the control centre to directly mobilise fire appliances, giving them considerable information at greater speeds than at present and improving response times. These systems, along with comprehensive training, will provide effective support to control room staff for resource and incident management.</p> <p>It is much more important that control staff be skilled in effective Emergency Call Management techniques and in dealing sympathetically with callers who are distressed or in difficult circumstances. These skills, along with the necessary training, will be built into the IPDS competencies for control staff, which they will be required to achieve and maintain.</p>

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24	2.16 - RCCs	<p>The new National Framework should set out achievable timescales for delivery of Regional Control Centres and these should be met. There should be the functionality to deliver the requirements of the most advanced fire and rescue services in terms of IRMP data, mobilising based on Automatic Vehicle Location and risk based mobilising based on IRMP.</p>	<p>The FiReControl project sets out to bring all fire and rescue services' technology up to the level of the best (see answer to point above). Each regional control centre will take into account, and store information on, IRMP and Pre-Determined Attendances (PDAs) for each Fire and Rescue Authority. It will be the responsibility of each authority to keep this information up-to-date in partnership with the Regional Control Centre.</p>
25	2.16 - RCCs	<p>We continue to press strongly for some form of accommodation to be found to link the three Shared Control Rooms that were instigated by central government policy and Invest to Save Budget pilot in 1999/2000 with the nine Regional Control Centres.</p>	<p>The Invest to Save Budget tri-service control rooms were initiated as pilot projects, prior to 11 September 2001, to assess the feasibility of sharing controls between the emergency services. The pilots have shown that the different business needs of the three services are a key implementation barrier. Also, the tri-service centres do not meet the resilience requirements of the Critical National Infrastructure post 9/11.</p> <p>However, many valuable lessons are being learnt from them. They have brought about significant benefits in terms of closer working between emergency services, and regional controls will not present any barriers to this. It is also the case that the centres in question will still be viable as bi-service controls, as the fire calls account for fewer than 10% of calls in all three sites.</p>
26	2.18- RCCs	<p>We are concerned about the assumption that surplus staff could or would want to transfer to other jobs within the authority. The options for similar work or similar earning potential are small. The comments in the National Framework raise hopes which may not be deliverable.</p>	<p>We recognise that the introduction of RCCs will have implications for existing control room staff. We are, however, putting a strong emphasis on the retention of these staff whose tremendous knowledge base and experience we would not wish to lose. The new IPDS system and proposed multilevel entry will provide opportunities for control staff in a much wider range of service careers than was previously possible. There will be opportunities to move into specialist areas such as system or database work, training and brigade liaison. Additionally, many brigades actively seek fire control staff to work in areas such as Community Fire Safety and Public Education, Statistics, IRMP work and Fairness & Equality. This presents a great opportunity for fire and rescue services to actively promote diversity within their organisations.</p>

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27	2.19 - Procurement	The National Framework should recognise role of County Councils in Fire Service Procurement.	The expectations of Government in respect of procurement by Fire and Rescue Authorities will be set out in the National Procurement Strategy (NPS), a draft of which is out for consultation. Particular issues faced by County authorities will be examined in producing the final NPS, although, as the focus of the NPS is fire specific procurement, it is unlikely that a generic County procurement unit would be in a position to add more value than service specific arrangements.
28	2.24 - BCMs	The role of the Business Change Manager (BCM) should be set out more fully.	We note this comment. The role of BCMs will be set out more fully in the 2005/06 National Framework.

CHAPTER 3 - EFFECTIVE RESPONSE

	Paragraph	Comment	Response
1		Although there is mention of the development of flexible and appropriate response options for more common incident types, there should be specific highlighted objectives.	These are for Fire and Rescue Authorities to determine.
2	3.3 - Right Equipment	There has been some government support in the way of equipment but we have still had to invest heavily. We believe that this should be recognised in the funding mechanisms.	The Government is committed to meeting any new burden arising as a result of new duties placed upon Fire and Rescue Authorities. We have met the commitment to equip the Fire and Rescue Service by investing in the New Dimension programme. At Fire2004 we announced that we would fund up to £16 million to meet the crewing costs of this investment. Other revenue implications of the investment will be discussed with CFOA and the LGA.
3	3.10- Utilisation of Resources	We believe the pursuit of greater flexibility will require a stronger commitment from all stakeholders or, alternatively, the use of more central direction.	We continue to encourage commitment from all stakeholders.
4	3.12 - Unwanted signals from automatic fire alarms	The Government should positively support the development and use of third party certification schemes for fire safety systems, including automatic fire alarms, and fire safety products and equipment.	The Government encourages such schemes, but does not consider that they should be made compulsory.
5	3.12 - Unwanted signals from automatic fire alarms	The Authority considers that the National Framework should also include reference to the newly published CFOA protocol on reducing unwanted alarm signals.	We agree with this comment. The National Framework will make reference the CFOA protocol.

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6	3.14 - Co-responder schemes	We agree that co-responders should be part of the role of the Fire and Rescue Service, working closely with other agencies to identify the most effective means of implementation.	We welcome this acceptance of the benefits that can accrue to the community through the greater involvement of Fire and Rescue Authorities in emergency medical response.
7	3.14 - Co-responder schemes	These arrangements need to be supported by a national strategy that acknowledges the agency with primacy in this area, sets out the role of other agencies, and identifies the appropriate cost sharing and saving arrangements.	Ambulance Trusts remain the lead on emergency medical response. Fire and Rescue Authorities would become involved in co-responding only as a result of a local agreement with the Trust. Trusts are expected to provide equipment and training free of charge and to come to an acceptable arrangement with the Fire and Rescue Authorities on the sharing of costs when authority personnel respond to a medical emergency at the request of the Trust.
8	3.15-Mutual Assistance	It is suggested that Fire and Rescue Authorities should seek to share, "...resources...such as...equipment used in traffic accident response..." This seems inconsistent with the new statutory duty imposed by the 2004 Act.	Fire and Rescue Authorities must fulfil the requirements of their new duties, in certain circumstances they can at the same time share resources.
9	3.23 - Fire Investigation	Fire Investigation must contribute to all aspects of the service delivery, in particular in: Community Fire Safety (CFS); Statutory Fire Safety; Fire Engineering; Risk Management.	We agree. IRMPs should include all of these issues as they are ways of managing risk.
10	3.28 - Contingency planning	We fully endorse the plans to ensure Fire and Rescue Authorities take responsibility for contingency provisions in the event of future industrial action. This must include more robust measures to deal with the inter-personnel tensions that arise during periods of disputes.	Effective management of personnel issues is part of Fire and Rescue Authorities' responsibilities in this regard.
11	3.28 - Contingency planning	The discussion around contingency planning should be more specific about Government's expectations of Fire and Rescue Authorities.	Contingency planning arrangements and the expectations of Fire and Rescue Authorities during a dispute, are the subject of on-going discussions with CFOA. Once there is an agreed outcome, reference to planning timescales and assumptions could be included in the National Framework.

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12	3.29	We would ask that the MoU between the HMIFS and the Audit Commission be reviewed periodically and immediately following the first round of CPA so that any inconsistencies or overlap can be ironed out.	We note this comment.
13	3.33 - Guidance	Government should remove the HMSO copyright from all the technical publications e.g. Manuals of Firemanship and provide all of them on a website and CD Rom for the benefit of the Service.	Whilst there is some scope for the reproduction of a number of crown copyright documents the facility to do so electronically has yet to be achieved. Discussions towards this end are ongoing.

CHAPTER 4 - RESILIENCE AND NEW DIMENSION

	Paragraph	Comment	Response
1		We support the Government's initiatives on Resilience and New Dimension, and we are pleased to see that many fire and rescue services are training and equipping RDS staff for this role.	The New Dimension programme is working in partnership with CFOA to ensure that each capability is defined and developed to ensure an effective and efficient response.
2		The policies covered in chapter 4, are relevant for 2005/06, as they represent the main issues and challenges facing Fire and Rescue Authorities in the coming year.	These have been retained and updated in the 2005/06 National Framework.
3		We welcome the additional investment provided through the New Dimension programme.	The Framework has been updated to reflect the additional £16 million for crewing.
4		The respective roles of the Regional Management Boards and ODPM staff and with regard to New Dimension Planning should be clearly defined.	The Framework will be updated to set out the relationship between the New Dimension programme and Regional Management Boards.
5		We welcome the additional investment from government. There should be recognition of the ongoing revenue and capital cost of supporting this work.	See 2004/05 consultation response (Chapter 4, response 2)
6		Precise details of distribution of crewing £16m and expected FRA commitment are needed.	ODPM is in consultation with CFOA and LGA about the allocation of crewing funds. The National Framework will be updated to reflect the position at the time of drafting.

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7	Regional resilience	The National Framework contains strong statements urging Fire and Rescue Authorities to participate in Regional Resilience Forums. It is difficult to see how this can be achieved, when Government Office North West only allow one representative from North West Fire Services to sit on the Regional Resilience Forum.	We note this comment. The National Framework will be updated to clarify the representation required from Fire and Rescue Authorities on Regional Resilience Forums.
8	Regional resilience	Local Authority Emergency Planning Units have a role to play in emergencies.	We recognise the wider role that local authorities will play in emergencies, but the aim of the National Framework is to focus on the priorities and objectives for the Fire and Rescue Service.
9	Training	Chief Fire Officers are asked to work with New Dimension Regional Planners to decide which personnel receive New Dimension training. It is not clear what training is being referred to.	We note this comment. The National Framework will clarify this and provide an update on New Dimension training.
10	Training	The requirements and competencies of New Dimension need to be included within the role maps, otherwise it will not be seen as an integral part of the role of firefighters.	IPDS already allows for the new requirements of New Dimension. The outcome-based approach of IPDS role maps provides the flexibility to incorporate new skills over time.
11	Firelink	Confirmation of the final provision and costs of 'Firelink' would be welcomed in order to prepare future budgets.	We shall be discussing with Fire and Rescue Authorities the scale of their contribution to the cost of using the Firelink system once we have awarded the contract (currently scheduled for early 2005). In the meantime, ODPM is funding measures to ensure radio systems remain operationally effective until replaced by Firelink.
12	Firelink	We continue to support Firelink but require clarity on timetable.	The National Framework will be updated to reflect the revised timetable.

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13	Firelink	We see little manifestation of co-operation between central government Firelink and FiReControl teams.	We note this comment. Firelink, FiReControl and New Dimension are now being managed as a single programme. Work is continuing on the roll-out of Firelink and the interface with FiReControl. The National Framework will be updated to reflect the position at the time of drafting.
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CHAPTER 5 - FIRE & RESCUE STAFF

	Paragraph	Comment	Response
1		<p>In chapter 5, ODPM should clarify:</p> <ul style="list-style-type: none"> • How Fire and Rescue Service Staff (FRSS) are to be incorporated into the HR workstreams identified in Chapter 5; • What structures will be set up to facilitate the engagement of FRSS and their representative bodies, in the workforce modernisation agenda; • How institutional racism will be tackled for FRSS. 	<p>Except where issues are specifically related to one section of the Fire and Rescue Service because of the need to tackle specific issues - e.g. recruitment of staff on the retained duty system or firefighter selection tests and pensions - Chapter 5 explicitly covers all fire and rescue staff within the HR workstreams. We will ensure that the redrafted National Framework makes this clear.</p> <p>Where effective links with representative bodies do not already exist, these will be developed over the coming months as the work on various issues is taken forward. All representative bodies will have direct involvement both in the identification of key equality and diversity issues and the development of solutions as part of the network centring on the Equality and Diversity Programme Board "Diversity Happens". The Board will be responsible for providing the strategic agenda for the Fire and Rescue Service on these issues.</p> <p>Issues of racism and discrimination will be tackled by "Diversity Happens" in setting the strategic agenda on equality and diversity for the Fire and Rescue Service.</p>
2		<p>The National Framework covers all the strategic areas within the broad remit of HR. The themes are clearly stated, well laid out and easy to understand. All areas appear to have been addressed, without unnecessary or irrelevant inclusions.</p>	<p>We welcome this endorsement of the approach taken in drawing up the National Framework.</p>

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3		<p>The Framework needs to recognise that many support staff are employed by the County Council not by the Fire and Rescue Authority.</p> <p>In such circumstances the County Council will need convincing that there is a greater benefit or economy of scale for its fire brigade in going into 'partnership' with other fire brigades on HR and personnel matters rather than continuing to benefit from the corporate arrangements currently in place.</p>	<p>In county Fire and Rescue Authorities it may well be that the county HR function provides best value in respect of certain HR services. However, collaborative working between fire and rescue services should achieve benefits on those HR services where there is a particular fire and rescue service dimension, such as occupational health and health and safety; it also makes sense to collaborate on recruitment and training.</p>
4		<p>The National Framework should make more reference to RDS staff including the recommendations of the Retained Review Team.</p>	<p>The updated version of the 2005/06 National Framework includes these references.</p>
5		<p>We believe the Framework should reflect the Government's commitment to improved advocacy for RDS personnel through reform of membership of the NJC.</p>	<p>We disagree that this is an issue for the National Framework. The Government set out its policy position on NJC reform in the White Paper "Our Fire and Rescue Service". The two sides of the NJC are currently considering voluntary reform and we hope that this will deliver the necessary improvements. Government has taken powers in the Fire and Rescue Services Act to set up NJCs under the Fire and Rescue Services Act 2004 if necessary.</p>
6	5.3	<p>We see the current Government strategy as a welcome and well thought out start, but there is a lack of progress on the ground in some areas. Restrictive practices that stop full use being made of the RDS staff remain prevalent.</p>	<p>The Government is committed to the modernisation agenda. The Government particularly values the contribution of staff on the retained duty system, which provides the backbone of many Fire and Rescue Authorities across the country. It is important that full use is made of their valuable skills. Recommendations on tackling these issues were made by the Retained Review Team to the Practitioners' Forum in September 2004. The Review Team's report and recommendations will be published in January 2005.</p>

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7		An increased role for firefighters on the retained duty system is suggested throughout the document. It suggests that releasing personnel for firefighting duties will be of benefit to employers. However, with the absence of financial incentives, this constitutes a perverse incentive for employers.	The Retained Review Team considered this issue and further work needs to be carried out locally, regionally and nationally to develop effective incentives to encourage employers to release staff. ODPM has undertaken to discuss the national issues relating to employer commitment both with employers' organisations and colleagues in other relevant Government Departments.
8	5.5	Despite the recent raising of the profile of RDS staff and recognition of the potential to help deliver safer communities, RDS staff are often forgotten. Very recent examples include the National Workforce Development Plan and the CFA/DRC (Disability Rights Commission) draft guidance on the Disability Discrimination Act.	We accept that the National Workforce Development Strategy (NWDS) should have said more about particular training and development issues for RDS staff. ODPM officials will review the DRC documents with regard to the inclusion of RDS issues.
9	5.6	The implementation of IPDS has failed to focus on RDS staff in many fire and rescue services. Some Fire and Rescue Authorities see it as an opportunity to maintain or enhance the existing status quo.	This issue was explored by the Review Team and will be covered in their report. The concerns about the application of IPDS to RDS staff are noted. They will inform the development of effective methods of delivering development and training for RDS staff.
10	5.6	The requirement to acquire validated skills and competencies will increase the burden on firefighters and their families. Future editions of this document should set out Government support for the recruitment and retention of RDS staff.	

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11	5.7	We believe that the Government will have to keep under review its checks and balances to ensure that modernisation happens. We would suggest that a commitment to this effect is included in the National Framework.	We note this comment and considered how this might be achieved in drafting the 2005/06 National Framework.
12		The final recommendations of the Retained Review Team should be published as a priority.	We aim to publish the full report by early 2005.
13	5.8	We are heartened by the open and innovative approach of many of the recommendations in the report of the Retained Review Team. We believe consideration should be given to the setting of specific target dates to ensure that reforms are not delayed or ignored.	We agree that these necessary reforms need to be implemented. For this reason the Practitioners' Forum and the Business and Community Safety Forum have agreed to constitute a task group to take on and champion the recommendations made by the Retained Review Team.
14		The Equalities Action Plan and Human Resources Strategy both provide scope to deliver the requirements of an IRMP.	We welcome this comment.
15	5.10 - HR Management	When will the actions referred to in 5.10 happen?	Work to take these issues forward will be commencing shortly with a view to having effective measures in place early in 2005.
16	5.10 - HR Management	The national recruitment literature is useful, but we believe the development of regional literature aimed specifically at the diverse communities and group within each area is also vital to any recruitment campaign. Consequently, it may be more beneficial to provide additional funding to regions for production of this literature locally.	We agree that the development of regional literature would be an effective additional tool in raising the profile of the Fire and Rescue Service across communities. Individual Fire and Rescue Authorities should collaborate to achieve this regionally.

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17	5.10 - HR Management	We welcome the Government supplying the recruitment and career literature launched in July 2004, but feel that this investment should be followed up by a high profile advertising campaign to attract people to the retained duty system.	<p>The Retained Review Team have given consideration to this issue in their report and recommended that fire and rescue services develop an advertising and recruitment strategy taking into account the differing demographic make-up of the areas they serve. Fire and rescue services should:</p> <ul style="list-style-type: none"> • set clear targets for the reduction of vacancies in their area based on the requirements in their IRMP; • analyse the demographic make up of the area surrounding each retained station to assess which type of campaign or mixture of campaigns might be most successful in each locality; • critically review campaigns on an ongoing basis to identify which methods have proved most effective, and; • proactively share information on recruitment issues with other fire and rescue services, pooling examples of good practice.
18	5.11 - HR Management	We believe the National Framework commitment to a pay and workforce strategy must focus on the delivery of an effective and efficient RDS workforce.	We agree that it is important to deliver this but the Pay and Workforce strategy will not cover this in any detail.
19	5.12- HR Management	We have reservations about the practicality of achieving some of the HR goals set for Regional Management Boards (RMBs). HR strategies need to be consistent and co-ordinated, in accordance with the National Workforce Development Strategy.	We acknowledge these concerns. ODPM will provide RMBs with guidance on a number of HR issues. Through the HR Practitioners' Group officials will be working with HR professionals within the Fire and Rescue Service to support RMBs to achieve effective outcomes.
20	5.13 - 5.17 Improving Opportunities	It may be beneficial to consider the production of workshops or documentation to assist and advise in recruitment approaches.	A recruitment toolkit was developed by ODPM and launched by Phil Hope on 7 September at Fire 2004. The toolkit is designed to provide recruiters with information and guidance on effective advertising and recruitment campaign development. The toolkit also includes an interactive "chatroom" style facility for sharing good practice between Fire and Rescue Authorities. The toolkit is now available online.

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21	5.13 - 5.17 Improving Opportunities	We have concerns regarding the development of equality issues for Fire and Rescue Authorities. We welcome the introduction of equalities targets for Fire and Rescue Authorities, but in order for the Equality and Diversity Programme Board to make real progress it needs to engage more effectively with authority Chairs and Chief Fire Officers.	We note these comments. The issue will be considered by the Equality and Diversity Programme Board "Diversity Happens" and a strategy will be developed, in partnership with key stakeholders, over the coming months to address these concerns. The Board will also look more closely at the internal issues of development and progression for staff from minority groups including women.
22	5.13 - 5.17 Improving Opportunities	At various points in the document, the need to recruit a diverse workforce which represents the community it serves, is highlighted. No acknowledgement is made of the difficulty individual services will face in progressing this aim given the need to shrink the workforce to realise efficiency savings.	
23	5.13 - 5.17 Improving Opportunities	The current targets for the recruitment, retention and development for women and ethnic minorities are unrealistic. The targets should be changed to reflect a percentage of those personnel actually recruited in any given period rather than counting total numbers.	
24	5.13 - 5.17 Improving Opportunities	We agree with the objectives to provide our current staff, and future employees with clear opportunities to develop the skills required to deliver the Fire & Rescue Services aims and objectives effectively	We welcome this comment.

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25	5.18 - Appointments and promotions	We believe that the document fails to acknowledge the considerable practical difficulties that the service will face in recruiting directly to roles other than firefighter.	The issue of multi-level entry is being addressed as part of the development of the Assessment and Development Centre process. However several Fire and Rescue Authorities have already started to tackle this issue with regard to the appointment of senior staff including Chief Fire Officers. Consequently, there already exist examples of how this has been approached.
26	5.20 - 5.21 Recruitment	The continued development of a collaborative approach within the North West Region will only enhance recruitment and selection procedures.	We welcome this endorsement of the benefit of collaborative working for HR issues.
27	5.20 - 5.21 Recruitment	The principle of Personal Qualities and Attributes (PQAs) needs to be extended to support staff.	Applying PQAs to support staff is primarily a decision for employers in the light of current work on role maps.
28	5.22 - 5.23 Discipline	We agree with the principles set out in Framework although the procedure contained within the revised grey book was not as acceptable as had been expected.	<p>The discipline provisions within the grey book have been developed in consultation between the employers and employees representatives, but have been proposed as a default position for those Fire and Rescue Authorities who have not developed an ACAS compliant procedure of their own.</p> <p>Many Fire and Rescue Authorities already have discipline processes and procedures for staff other than firefighters and control room operators which are ACAS compliant. In many cases this is appropriate for all staff.</p>
29	5.22 - 5.23 Discipline	The new procedures are reasonably clear and precise, although it is difficult to understand why it was felt necessary to go beyond the guidance contained in the ACAS code in certain areas	

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30	5.27 Sickness Management/ Ill Health Retirement	It must be recognised that there will only be limited opportunity for re-deployment as an alternative to ill-health retirement. The recently circulated amendments to the Firefighters' Pension Scheme still leave many questions unanswered.	Re-deployment is a matter for decision by an authority taking account of employment law and an employee's contract. If asked ODPM will advise on pension issues and has issued general guidance on the application of the recent amendments.
31	5.27 Sickness Management/ Ill Health Retirement	Whilst changes to the pension regulations are required, these changes should not be viewed in isolation. The retention of operational staff in other roles may lead to potential "equal pay - equal value" scenarios that will have to be addressed	The intention of the amendment to the Firefighter Pension Scheme (FPS) was to enable a person who was unfit for operational duties to be transferred to another role appropriate to a firefighter. We are considering another amendment to the FPS which would provide protection of pension benefits for a person whose pay was reduced.
32	5.29 Pensions	We agree with the need to review the funding of the firefighters' pension scheme, with particular emphasis on the rising cost of those who have retired when balanced against the contributions.	We note this comment. We are planning to publish proposals for consultation early in 2005.
33	5.29 Pensions	Any review of pension arrangements for all firefighters must remove the anomaly whereby a wholetime firefighter employed on a retained contract with a different authority could, under existing rules, qualify for two pensions in circumstances where ill-health retirement was brought about by an injury sustained in the performance of retained duties.	We are aware of the anomaly and have warned Fire and Rescue Authorities of problems which may arise from the employment of persons with wholetime/retained contracts. This has been discussed in the Firefighters' Pensions Committee and we intend to bring forward an amendment to mitigate the cost to authorities. The proposed new pension arrangements will not replicate the anomaly as a person on a retained duty contract would be entitled to pension benefits based upon service and not wholetime equivalence.
34	5.29 Pensions	We believe the National Framework should specifically repeat the previous commitment in the White Paper for introducing an appropriate pension scheme for retained firefighters, recognising the variety of personal circumstances involved.	The proposals for new pension arrangements are that persons on the retained duty system should be treated as part-time workers for pension purposes. We will consider what additional arrangements might be offered, e.g. stakeholder pensions and AVCs, if these might offer greater flexibility for the retained.

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35	5.29 Pensions	<p>The establishment of a pensions account to smooth out the burden caused by the volatility of costs is welcomed.</p> <p>However, there is clearly a need to involve Fire and Rescue Authorities at the earliest opportunity in developing this option to ensure the most effective scheme is constructed.</p>	<p>We are pleased that proposed new pensions finance arrangements have been welcomed. Details of the new arrangements will be issued for consultation in early 2005 and we look forward to hearing the views of authorities.</p>
36	5.29 Pensions	<p>Work on a revised pension scheme for firefighters is behind schedule and should be brought forward as early as possible.</p>	<p>Consultation documents were published on 13 October 2004.</p>

CHAPTER 6 - WORKFORCE DEVELOPMENT

	Paragraph	Comment	Response
1		<p>ODPM should clarify:</p> <ul style="list-style-type: none"> • The implications of IPDS for FRSS • How FRSS terms and conditions will interface with the Government's Fire and Rescue Service reform agenda 	<p>Work on developing role maps for wider roles is underway. More remains to be done before Employers can commit to rolling out IPDS in its current form to all roles. Whilst the ODPM-led IPDS project will not provide for role maps for all staff, it is helping CFOA work towards this objective.</p> <p>It is for the Employers to decide whether they see a need to change any terms and conditions for certain staff to enable them better to meet the needs of the modernisation agenda.</p>
2	6.3 - IPDS	<p>Role of IPDS 'hub' needs to be clearly defined.</p> <p>6.3 implies that 'specialist expertise', on implementing IPDS in the workplace exists at the 'hub' and the Fire Service College (FSC). It does not and this should be made clear within the National Framework.</p>	<p>We believe the 'Hub's' role has been clearly defined. It is set out at www.ipds.co.uk</p> <p>The 'Hub' leads on IPDS implementation and the production of central guidance but has never claimed to be the sole source of expertise.</p>
3	6.3 - IPDS	<p>Any work to consider role maps for non-operational posts within the Service must recognise the limitations in respect of County Council employed staff working within the county fire and rescue service.</p>	<p>We note this comment and will convey it to those currently working on role maps for such staff.</p>
4	6.5 - IPDS	<p>There is concern that the components of the Assessment and Development Centres (ADC) i.e. the exercises to be used, will be prescriptive, designed at the centre and imposed on Fire and Rescue Authorities.</p>	<p>We note this concern and have addressed it in drafting the 2005/06 National Framework. A decision on whether the full ADC process (or parts of them) could be mandatory will not be taken until further work, including stakeholder consultation, is undertaken.</p>

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5	6.6 - IPDS	It is imperative that timescales for delivering the national guidance on ADC's does not slip.	We note this comment.
6	6.11 - Workforce Development Strategy	Guidance is necessary to determine how we select and develop those from outside the Service to become managers who will undertake operational Command and Control.	The "Strategic Leadership Development Framework" Task and Finish Group is currently considering whether and to what extent there is a need for a specific leadership model for the Fire and Rescue Service. One of the quality criteria will be how the framework recognises and accommodates both the introduction of open recruitment to managerial positions in the Service and the NWDS. Guidance on how we select and develop those from outside the Service to become FRS managers who will undertake operational command and control will be an essential part of this process.
7	6.11 - Workforce Development Strategy	We would wish to be involved in the further production of Command and Control development programmes in the same way that we have been with all other associated IPDS components	We note this comment.
8	6.11 - Workforce Development Strategy	Work on the National Workforce Development Strategy is ongoing and the outcomes should inform the next edition of the National Framework. This will need to be supported by the development and publication of role maps for employees other than those directly associated with the firefighting roles. The timescales for the delivery of these should be set out.	CFOA is leading on the development of role-maps for non-uniform/FRSS wider roles. CFOA expects these role maps to be available in February 2005.

CHAPTER 7 - FINANCE

	Paragraph	Comment	Response
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<p>1</p>		<p>We would welcome early details on the likely financial implications of the regional control rooms and arrangements for financing and savings distribution.</p>	<p>We recognise that, while the Outline Business Case shows a steady-state saving of 30%, there will be transitional costs. Support for net additional costs during transition, including retention and redundancy costs, will be considered under new burdens principles. At this stage, it is impossible to predict with any accuracy the transitional burdens falling upon a particular FRS. The cost profile will depend on the timing and order of roll-out within and between regions, and the degree of relocation, redundancies, retention payments and recruitment, which will depend, to a large extent, on the location of the new control centres. Our understanding of these factors will become much clearer during the latter part of the procurement stage and during the development stage of the project. As a general principle, it is up to each FRA to negotiate as rapid an exit as possible from existing arrangements and liabilities, while ensuring the best value for money, and dispose of assets effectively. It should be noted that savings from disposal of assets will rest where they fall.</p> <p>We will be looking to make early notification of the additional funding for FRAs.</p> <p>It is likely that the mechanism for funding new burdens will be a grant.</p> <p>Proposals on RCC finance arrangements and the distribution of costs between and within regions are put forward in a consultation document on RCC finance and governance, which has been issued to Fire and Rescue Authorities Chairs. Regions should be responsible for choosing their own means of dividing costs between Fire and Rescue Authorities intra-regionally. We look for them to submit their intended way forward in response to this consultation.</p>
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2		<p>In particular there is a need to address the funding required to deliver the new statutory duties placed upon Fire and Rescue Authorities</p>	<p>Where a central government department's policies or initiatives increase the cost of providing local authority services, the 'new burdens' principle means that Government will fund the additional expenditure, provided that the aggregate value of the burdens in any financial year across all FRAs in England is greater than £100,000.</p> <p>We have met the commitment to equip the Service by investing in the New Dimension programme. At Fire 2004 we announced that we would fund up to £16 million to meet the crewing costs of this investment. Other revenue implications of the investment will be discussed with CFOA and the LGA.</p>
3		<p>This chapter attempts to portray a financial environment that is benign. The reality is very different. IRMPs were announced as a means of improving public safety. It is clear that the Government expects them to deliver financial savings.</p>	<p>IRMPs set out each Fire and Rescue Authority's strategy for:</p> <ul style="list-style-type: none"> • reducing the number and severity of fires and, in collaboration with other agencies, road traffic accidents and other emergency incidents occurring in the area for which it is responsible; • reducing the severity of injuries in fires, road traffic accidents 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); and • providing value for money for its local council taxpayers. <p>As the Government has repeatedly made clear, Fire and Rescue Authorities must understand fully their own responsibility for minimising council tax increases. It is, first and foremost, for local authorities to set their own council tax. But the Government expects authorities to act prudently. If Fire and Rescue Authorities make efficient and effective use of resources to implement their IRMP and action plan, including using more efficient working practices where appropriate then we believe that substantial savings are available. The Government is prepared to use its powers to cap excessive increases.</p>

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4	7.1	<p>We welcome the grant increases for Fire and Rescue Authorities, but there needs to be recognition that much of this increase will be swallowed up by pension costs. This will leave considerably less investment for community fire safety initiatives to reduce the number of deaths and injuries caused by fires. Future spending reviews need to take account of the pension implications for the Fire and Rescue Service and allow Fire and Rescue Authorities to invest fully in community fire safety initiatives.</p>	<p>Estimated pensions pressures were taken into account in the 2004 Comprehensive Spending Review.</p> <p>Work is underway on developing potential new financial arrangements for firefighter pensions. The proposed option would mean a new pensions account for each Fire and Rescue Authority into which their employee contributions and a new employer's contribution would be paid and from which their pensions outgo (pensions awards and lump sum payments) would be met. Government would top up these accounts at the end of the year, or recover surpluses, as necessary. This would counter the yearly volatility in authorities' pensions expenditure and increase transparency in that authorities' budgets would accurately reflect the ongoing, accruing costs of providing the frontline service. Detailed proposals will be issued for consultation in early 2005.</p>
5	7.2	<p>As a result of delays in :-</p> <ul style="list-style-type: none"> • Finalising the pay agreement; • Releasing a draft national procurement strategy; and • The likely timescale for regional control rooms <p>concerned that the delivery of these savings and efficiencies may well extend beyond the life of the current spending review</p>	<p>The Government has long recognised that there may be a lag between costs and savings of fire and rescue service modernisation. That is why, at the LGA's request, we paid £30 million transitional funding to English and Welsh Fire and Rescue Authorities in 2004/05. Originally the Government planned to recoup the transitional funding before the end of 2005/6. But we have recognised that there have been delays in the pay and modernisation process and that, amongst other things, this could mean that we were seeking to recoup the transitional funding less than a year after it had been distributed to authorities. The LGA therefore suggested that the recouping of the transitional funding be deferred until 2006/07. The LGA and Fire and Rescue Authorities have provided evidence to support their case, including on efficiencies to be delivered for 2006/7. We have therefore agreed to meet the LGA's request. This is reflected in the 2005/06 provisional government settlement, which provides Fire and Rescue Authorities with an average grant increase of 3.7%. No authority will get an increase of less than 2.5%.</p>

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6	7.3	<p>There should be recognition of the specific nature of County Council fire and rescue services in any future framework, for example in procurement. The local government procurement strategy requires savings to be met by County Councils. Additional, fire specific procurement savings can see county fire services "hit twice" at a time when financial resources are at a minimum, due to Government applying capping powers and local pressure to keep council taxes low.</p>	<p>The role of Counties will be recognised in the NPS - see comment 27 in chapter 2</p> <p>Where a County Council makes savings from more efficient procurement for its Fire and Rescue Service, those savings will score against both the local government efficiency target and the ODPM Fire and Rescue Service efficiency target. Hence County fire and rescue services will not be "hit twice".</p> <p>As the Government has repeatedly made clear, Fire and Rescue Authorities must understand fully their own responsibility for minimising council tax increases. (See chapter 7, item 3 above.)</p>
7	7.3	<p>Clear threats of capping are difficult to see as Government providing support to Fire and Rescue Authorities.</p>	<p>The Government wishes both to support Fire and Rescue Authorities and to protect council tax payers from excessive increases. In 2005/06, FRAs will, receive an average 3.7% increase in grant and no authority will get less than 2.5%. In this context, council tax payers would find it hard to understand large increases in their bills. The Government believes that average council tax increases in England in 2005/06 should be less than 5% - this applies to all authorities, including police and Fire and Rescue Authorities.</p>

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8		<p>It is important that Fire and Rescue Authorities are given the time and resource to deliver in what it is apparent will be a difficult financial environment. We ask that Ministers recognise these pressures, and if they cannot be alleviated, are realistic about capacity and timescales. Stakeholders want to deliver, but do feel there is a mismatch between expectations and the delivery of resources.</p>	<p>The Government has long recognised that there may be a lag between costs and savings of fire and rescue service modernisation. That is why, at the LGA's request, we paid £30 million transitional funding to English and Welsh Fire and Rescue Authorities in 2004/05. Originally the Government planned to recoup the transitional funding before the end of 2005/6. But we have recognised that there have been delays in the pay and modernisation process and that, amongst other things, this could mean that we were seeking to recoup the transitional funding less than a year after it had been distributed to authorities. The LGA therefore suggested that the recouping of the transitional funding be deferred until 2006/07. The LGA and Fire and Rescue Authorities have provided evidence to support their case, including on efficiencies to be delivered for 2006/7. We have therefore agreed to meet the LGA's request. This is reflected in the 2005/06 provisional government settlement, which provides Fire and Rescue Authorities with an average grant increase of 3.7%. No authority will get an increase of less than 2.5%.</p>
9	7.5-7.6 Transitional Funding	<p>Request that the Government consider the phasing of the recovery of transitional funding.</p>	
10	7.5-7.6 Transitional Funding	<p>We are of the opinion that the modernisation start-up costs will prove a barrier to meeting the aims and objectives of the 'Framework' in the short-term.</p> <p>These costs should be funded in full via the 'New Burdens' principle.</p>	

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11	Revenue Support	An appropriate mechanism should be established by which achievable savings in some areas should be redistributed to those authorities already recognised as having modernised.	The Government has recognised that the costs and savings of modernisation may fall unevenly across Fire and Rescue Authorities. The Government has therefore asked a working group of officials, including the LGA and representatives from Fire and Rescue Authorities, to examine the case for change and possible alternatives to the existing Fire Formula Spending Share that might better reflect Fire and Rescue Authorities' needs. The Government will consider proposals for changes to the formula in the light of the working group's conclusions. Any changes to the formula would come into effect for 2006/07 at the earliest.
12	Revenue Support	Combined Fire and Rescue Authorities (CFAs) have been excluded from the RSG adjustments being introduced arising from the changes in Civil Contingency arrangements. This also needs to be reviewed.	The increase in civil contingencies funding from £19million to £40million is to fund local authorities for their additional responsibilities from the Civil Contingencies Act 2004. The additional responsibilities fall to the local authorities, hence the CFAs have not received any of this funding. CFAs are benefiting from Government's £188 million investment in equipment and training for resilience and the more recently announced £16 million additional funding for crewing through its New Dimension programme. Where CFAs enter into collaborative arrangements to perform civil defence functions on behalf of local authorities, resource transfers are currently determined locally. This approach will continue with the Civil Contingencies Act. Local authorities can delegate functions to CFAs, and will need to arrange appropriate resource transfers.
13	Revenue Support	The timetable for distribution of funds relating to arson reduction should be reviewed to ensure that they can fit the business planning cycle and take account of predicted performance.	We note this comment.
14	7.8 - Pensions	The Authority welcomes the proposed review of the pensions process.	We are pleased that the current review of pensions finance arrangements has been welcomed. Details of the proposed new arrangements will be issued for consultation in early 2005 and we look forward to hearing the views of authorities on these.

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15	7.8 - Pensions	<p>The National Framework should clearly identify that the pensions issue is not the fault of the Fire and Rescue Authorities and to clearly identify that for a number of years the pension contributions of firefighters (& police officers) were being used to keep local taxes down.</p>	<p>The funding arrangements for firefighters' pensions are on a pay-as-you-go basis. Some of the problems with this system are highlighted in paragraph 7.8 of the National Framework. Paragraphs 7.9 and 7.10 set out what ODPM intends to do to address the problems and proposals will be issued for consultation early in 2005. In addition to this, amendments to the Firefighters' Pension Scheme have already been made to enable Fire and Rescue Authorities more flexibility to retain staff who would otherwise have to be retired on ill-health grounds and also to ensure that decisions on ill-health retirement are based on qualified and independent medical advice. Furthermore, work is underway on the development of new pension arrangements as described in paragraph 5.29 of the National Framework.</p>
16	7.8 - Pensions	<p>Fire and Rescue Authorities must be involved in the pension project at the earliest possible opportunity.</p>	<p>Details of the proposed new arrangements will be issued for consultation in early 2005 and we look forward to hearing the views of authorities on these.</p>
17	7.8 - Pensions	<p>It should also be acknowledged that as redeployment of staff increases, as an alternative to ill-health retirement, staff costs may increase.</p>	<p>Amendments to the Firefighters' Pension Scheme have been made to ensure that decisions on ill-health retirement are based on qualified and independent medical advice. The amendments also enable Fire and Rescue Authorities to have more flexibility to retain staff who would otherwise have to be retired on ill-health grounds. It will be for authorities to decide on, and budget for, the redeployment of these staff.</p>

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18	Pensions funding	<p>Our view is that the rising cost of the pensions burden, under the current funding constraints, can only mean further service cuts. An amendment to the RSG funding in 2005/06, that eased the current increasing burden, would ensure that the financial implication of the recognised pensions problem does not directly result in a capping issue for any Authority.</p>	<p>Work is underway on developing potential new financial arrangements for firefighter pensions. The proposed option would mean that that employee contributions and a new employer's contribution would be paid into a pensions account from which pensions outgo (pensions awards and lump sum payments) would be met. Government would top up the account at the end of the year, or recover any surplus, as necessary. This would counter the yearly volatility in pensions expenditure and increase transparency in that authorities' budgets would accurately reflect the on going, accruing costs of providing the frontline service. Detailed proposals will be issued for consultation in early 2005.</p> <p>As the Government has repeatedly made clear, Fire and Rescue Authorities must understand fully their own responsibility for minimising council tax increases. It is, first and foremost, for local authorities to set their own council tax. But the Government expects authorities to act prudently. If they do not, the Government is prepared to use its powers to cap excessive increases.</p>
19	7.10 - Distribution	<p>It is felt that any adjustment to distribution of the Formula Spending Share should take account of risk and the commitment and success of Fire and Rescue Authorities in reducing that risk.</p> <p>We note the proposed review of Fire Formula Spending Share and wish to contribute to the debate.</p>	<p>The Government has recognised that the costs and savings of modernisation may fall unevenly across Fire and Rescue Authorities. The Government has therefore asked a working group of officials, including the LGA and representatives from Fire and Rescue Authorities, to examine the case for change and possible alternatives to the existing Fire Formula Spending Share that might better reflect Fire and Rescue Authorities' needs. The Government will consider proposals for changes to the formula in the light of the working group's conclusions. Any changes to the formula would come into effect for 2006/07 at the earliest.</p> <p>Stakeholders are welcome to contribute to the debate through ODPM officials, the LGA and representatives from Fire and Rescue Authorities on the working group.</p>

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20	7.11 - LPBR	Whilst the Prudential Borrowing Regime appears to bring advantages to Fire and Rescue Authorities, Shire Authorities will be disadvantaged as their borrowing is within a wider context and Authority wide capital programme.	The new system gives all classes of authorities freedom to borrow without Government consent, if they can service the debt from their own resources. The system encourages authorities to be innovative and to develop schemes which will generate revenues or savings to cover the borrowing costs. The Government will of course continue to support the major part of authorities' capital programmes.
21	7.12	Fire and Rescue Authorities should be encourage to be innovative with CE and new borrowing regimes.	
22	7.21 - Charging	Changes to arrangements for charging should not jeopardise innovation, reduce current income streams or introduce cumbersome bureaucracy. Utilisation of spare capacity to generate income streams has been and continues to be a significant contributor to the resources available for re-investment in fire safety work.	The arrangements put in place for charging and trading do not endanger any current income streams.
23	7.21 - Charging	We are of the opinion that in certain defined areas there is an apparent conflict of interest between providing chargeable advice and acting as the enforcement agency for fire safety.	The tension between acting as adviser and enforcing authority has long been recognised. Any Fire and Rescue Authorities trading in advice must do so through a company and ensure that appropriate insurance arrangements are in place. It is accepted that clients could not be penalised by the authority for following the advice of its trading company.
24	7.21 - Charging	When considering extending the power to charge, we would like to see this curtailed by the savings that will be made from the preventative initiatives undertaken by fire and rescue services, and also the savings made from reduced attendance at UFS from AFAs.	There are no current proposals to extend the scope of charging.

CHAPTER 8 - PERFORMANCE MANAGEMENT

	Paragraph	Comment	Response
1		We agree that the introduction of the CPA inspection process will assist Fire and Rescue Authorities in identifying future progress.	We welcome this comment.
2		The absence of formal guidance regarding the full inspection process is hindering the preparations of Fire and Rescue Authorities, who will be inspected by the Audit Commission in January 2005.	The Audit Commission has consulted widely in developing the Fire CPA framework and has recently completed a second round of piloting. The Commission will be publishing the final framework in December.
3		The finalised Comprehensive Performance Assessment (CPA) framework should be made available as soon as possible.	
4		The Framework should clearly identify community benefits and measurement processes by which fire and rescue services can be judged.	The National Framework clearly sets out national performance expectations for the Service. The Audit Commission will assess, through Fire CPA, how effectively authorities have set about meeting both national requirements and the specific needs of the local communities they serve.
5		It is important to recognise that fire and rescue services are part of local government. Any inspection should strive to inspect work in this context. Fire and Rescue Authorities should also be recognised for their community leadership role; the importance of local priorities, local political choice and partnership working should not be underestimated.	Fire CPA is based on the local government CPA model and focuses strongly on both the effectiveness of partnership working and how effectively authorities engage with their communities in determining their priorities and delivering services.

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6		<p>The 'CPA 2005 - the way ahead' intention for councils to incorporate the work of the shared priorities groups, this should extend to Fire and Rescue Authorities, particularly in relation to the safer and stronger communities framework. The alignment of the fire CPA should consider the timing of CPA for County, District and Unitary councils in recognition of joint working, the need to co-ordinate services and give a more meaningful picture to local people.</p>	<p>The Audit Commission has recognised the importance of these objectives in the development of both the Fire CPA framework and that for County and single tier authorities for implementation in 2005.</p>
7		<p>There is no discussion about whether CPA will be the only inspection regime for the Fire and Rescue Service, there remains some doubt about the role of HM Fire Service Inspectorate, this needs to be clarified.</p>	<p>The role of HM Fire Service Inspectorate is set out at paragraph 3.31 of the National Framework and further detail is included in the Memorandum of Understanding at Annex C.</p>
8		<p>We would highlight the Government's commitment in the Strong Local Leadership - Quality Public Services White Paper to establish a model of inspection for local government that is proportionate and co-ordinated across the full range of local authority functions.</p>	<p>Both the Government and the Audit Commission are committed to the principles of proportionate and co-ordinated public service inspection and this is reflected in the Fire CPA framework.</p> <p>The arrangements for published reports is a matter for the Audit Commission.</p>
9		<p>We would also welcome performance management that clearly measures the community benefits for Fire and Rescue Authority activity.</p> <p>The principle of a rolling programme of inspection assessments, which will avoid the 'big bang' approach and discourage unhelpful league tables, should be taken forward for Fire and Rescue Authorities.</p>	

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10		We would ask that the statutory requirements be reconsidered, in relation to publishing a BVPP. The timetable for production is not in line with other corporate documents.	The timetable for production of a BVPP is already very flexible, permitting authorities to produce this document at any time up to June when outturn BVPI data must be incorporated.
11	Improvement planning	Sharing good practice and joint initiatives in improvement planning will create efficiencies.	We agree with this comment.
12	8.15 - Best Value and data collection	<p>The Authority supports the continuing use of Best Value Performance Indicators to measure performance and improve service delivery.</p> <p>The Authority also welcomes the ODPM's statement that, following the fundamental review of Best Value indicators for 2005/6, the BVPI set is expected to remain largely unchanged for the next 2-3 years.</p>	We welcome this comment.
13	8.15 - Best Value and data collection	The Fire and Rescue Service is part of local government, as such the LGA would like to see the Best Value Corporate Health Indicators, extended, where appropriate, to Fire and Rescue Authorities.	A separate consultation reviewing Corporate Health BVPIs proposed extending the scope of some indicators to include Fire and Rescue Authorities. A response to this will be issued in due course.
14	BVPIs	We have serious concerns that the focus of the activities of Fire and Rescue Authorities will be driven by the measurements outlined in the BVPIs, rather than by the strategic priorities set out in the 2005/06 National Framework.	The Audit Commission has responsibility for assessing progress against the strategic priorities set out in the National Framework. BVPIs provide one source of data for his review. They have recently been reviewed, and subjected to a separate consultation, to widen their scope to complement the strategic priorities set out in the Framework where appropriate.

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15	8.21 - LPSAs	We would be interested to learn more about why Fire and Rescue Authorities cannot have access to LPSAs.	LPSAs are available to all upper-tier local authorities in England and are designed to improve delivery of a wide range of public services. In the Second Generation of LPSAs, there is an even greater emphasis on partnership working. Upper-tier authorities are expected to discuss and agree priorities for improvement locally through their Local Strategic Partnerships for example, which should include Fire and Rescue Authorities.
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16	8.22 - E-Government	We would welcome the recognition within the National Framework of the specific position of the service in relation to the Government's IEG initiative	<p>Fire and Rescue Authorities are required to meet Government targets⁴⁰ for e-delivery of services including:</p> <ul style="list-style-type: none"> • 100% of relevant Government services should be capable of being delivered electronically by 2005; and • 100% of all newly created public records will be electronically stored and retrieved by 2004. <p>For local government, a corporate BVPI (BVPI 157) measures progress against the above targets. But simply making services available is not enough. Time and money will be wasted if they are not offered in ways that enhance quality, convenience and availability. ODPM's PSA of assisting local government to achieve 100% capability in electronic delivery of priority services by 2005, in ways that customers will use⁴¹ is now supplemented elsewhere in local government by benchmarks for priority service delivery and the take-up of e-services.</p> <p>ODPM no longer intends to publish Implementing E-Government priority outcomes for Fire and Rescue Authorities as it has done for other local authorities. The restructured e-Fire National Project will help Fire and Rescue Authorities meet their e-government targets. This aims to develop a public web portal for the Fire and Rescue Service, providing fire safety information and services to business and the community and a platform for future developments.</p>
17	8.22 - E-Government	The principle of ensuring that all services should be capable of being delivered electronically is understood and supported. Consideration of this should lead to a new target within the 2005/6 Framework.	

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18	8.22 - E-Government	Shire Fire and Rescue Authorities have been working to achieve improvement against BVPI 157 by utilising existing budgets. This has included the production of an annual Implementing E-Government (IEG) statement, as required by ODPM. Very limited financial assistance has been provided so far. Future Priority Service outcomes need to be specifically focussed and supported by the appropriate funding arrangements. These should be linked to the County Council timetable.	
19	8.22 - E-Government	Implementation of e-government policies is being hampered by a lack of government financial support to Fire and Rescue Authorities when compared to the rest of local government.	

CHAPTER 9 - RESEARCH

	Paragraph	Comment	Response
1	9.4 - Research Strategy	Support a Research Strategy.	We welcome this support.
2	9.11	The document suggests that Fire and Rescue Authorities should share findings and plans through the Practitioners' Forum. Whilst this suggestion is sensible the implementation is not facilitated by existing arrangements.	We recommend that the Practitioners' Forum consider how best to facilitate this process.
3	9.12 - Statistics	We have some concerns about how data will be gathered and retrieved following the introduction of regional control rooms. The cost implications of introducing new data collection systems should not be borne by the Authority.	The systems delivered by the FireControl project will include comprehensive management information systems which will include the data needed for statistical returns and other purposes. The cost of the new technology to be installed in the RCCs is being borne by ODPM.
4		The Authority would welcome further research on the effectiveness of intervention measures on reducing risk. This is a gap in knowledge essential to the further development of Integrated Risk Management. Research is needed into operational equipment that could be better used by staff with disabilities, supporting the need to make reasonable adjustments for these staff with disabilities.	The operational aspects of Fire and Rescue Service are part of the Fire Research Programme's five key areas. We hope to be able to undertake more research in this area next financial year, following a scoping study to be completed this financial year.
5		The link between the research arrangements set out in this document and those proposed in the National Procurement Strategy for the Fire and Rescue Service (September 2004) should be made explicit.	These links are being agreed and formalised at the current time.

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6		We support the five key areas outlined for research but would ask for effective mechanisms for promulgation and publication of work underway to avoid duplication within individual authorities or the regions.	We hope that the Fire Research Academy website will assist with promulgation.
7		We would encourage an early review of the Fire Damage Report, as this is a vital tool in informing IRMP and CFS initiatives.	This is taking place, and a consultation document on the proposed changes will be issued before the end of the year.
8		Alongside people and properties, types of businesses most at risk should be identified.	We hope that the revised data collection will assist with better analysis of those businesses most at risk.
9		A fully electronic data collection system should be created to provide real-time intelligence.	A project to introduce a fully electronic data collection system is well underway, and the system should be in place in 2005. Reporting will be much faster than under the existing system.

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ANNEXES

1	Annex A	Annex A to the current Framework contains targets that are inconsistent with BVPIs and are differently defined. Although these issues appear to have been at least partly rectified in recent consultative documents, it is considered essential that measures are consistently defined and are clearly set out in a single definitive source document.	Annex A included historic and interim targets.
2	Annex C	Annex C will need updating in light of the new Circular System, and Memorandum of Understanding between HMI, Fire Service Improvement Team and Audit Commission.	Annex C will be updated.

Annex: List of Acronyms

ACAS	Advisory, Conciliation and Arbitration Service
ACF	Arson Control Forum
AD B	Approved Document B
AFA	Automatic Fire Alarm
AVC	Additional Voluntary Contribution
AVLS	Automatic Vehicle Location System
BCSF	Business and Community Safety Forum
BVPI	Best Value Performance Indicator
BVPP	Best Value Performance Plan
CBRN	Chemical, Biological, Radiological and Nuclear
CFO	Chief Fire Officer
CFOA	Chief Fire Officers Association
CFS	Community Fire Safety
CIPD	Chartered Institute of Personal Development
CPA	Comprehensive Performance Assessment
DDA	Disability Discrimination Act
DfES	Department for Education & Skills
DH	Department of Health
DRC	Disability Rights Commission

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DTI	Department for Trade and Industry
DTLR	Department of Transport, Local Government and the Regions
ERA	Elected Regional Assembly
FRA	Fire and Rescue Authority
FRS	Fire and Rescue Service
FRSIP	Fire and Rescue Service Improvement Programme
FRSIT	Fire and Rescue Service Improvement Team
FRSS	Fire and Rescue Service Staff
FSC	Fire Service College
FSEC	Fire Service Emergency Cover
FSRD	Fire Statistics and Research Division
FSS	Formula Spending Share
FSYTA	Fire Service Youth Training Association
HFRC	Home Fire Risk Check
HMFSI	Her Majesty's Fire Service Inspectorate
HMO	Homes of Multiple Occupation
HO	Home Office
HR	Human Resources
ICT	Information Communication Technology
IEG	Implementing e-Government
IPDS	Integrated Personal Development System

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IPDS	Integrated Personal Development System
IRMP	Integrated Risk Management Plan
IRU	Incident Response Unit
ISB	Invest to Save Budget
IST	Implementation Support Team
LAA	Local Area Agreements
LFEPA	London Fire and Emergency Planning Authority
LGA	Local Government Association
LGPS	Local Government Pension Scheme
LPSA	Local Public Service Agreement
LSP	Local Strategic Partnership
MoU	Memorandum of Understanding
MRMS	Mobilising & Resource Management System
ND	New Dimension
NF	National Framework
NJC	National Joint Council
NPE	National Procurement Executive
NPS	National Procurement Strategy
ODPM	Office of the Deputy Prime Minister
PDA	Pre-Determined Attendances
PF	Practitioners' Forum

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PFI	Private Finance Initiative
PIWG	Performance Indicators Working Group
PQA	Personal Qualities & Attributes
PSA	Public Service Agreement
RCC	Regional Control Centres
RDS	Retained Duty System
RFU	Retained Firefighters Union
RIA	Regulatory Impact Assessment
RMB	Regional Management Board
RRFSO	Regulatory Reform (Fire Safety) Order
RRO	Regulatory Reform Order
RSG	Revenue Support Grant
SME	Small and Medium-sized Enterprises