



Fire and Rescue Service National Framework 2008/11
Consultation
Summary of Responses



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Contents

	Page
Introduction	5
General Themes	6
Chapter 1 Prevention, Protection and Response	7
Chapter 2 Resilience	11
Chapter 3 Diversity and Workforce	13
Chapter 4 Governance and Improvement	22

Introduction

Communities and Local Government published Fire and Rescue Service Circular 52/2007 on 14 November 2007. The Circular invited responses to questions relating to the 2008/11 Fire and Rescue Service National Framework, which will be published in May 2008. All responses were considered in drafting the 2008/11 National Framework.

Communities and Local Government undertook the consultation exercise according to the Cabinet Office's Code of Practice on Consultation insert footnotes as per last response. The consultation ran for 12 weeks.

47 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 Authorities and Regional Management Boards	39
Representative groups and industry bodies	8

Fire and Rescue Service Circular 52/2007 invited consultees to respond to the following questions in respect of each chapter of the National Framework:

- Do you think the proposed Departmental Strategic Objective and indicator(s) are appropriate? If not, why not, and what would you wish to see instead?
- What are your views on the new structure of the 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 a move to a three year document which ties in with Fire and Rescue Authorities' budgetary cycle and the streamlined structure, which has seen the number of chapters being reduced from nine to four from the 2006/08 National Framework.

Details of further comments and the Government's response to each are set out chapter by chapter in the table below. These are not attributed. Where two or more responses made broadly the same point this has been reflected in only a single entry in the table. Similarly text corrections or endorsements of individual points in the text have not normally been noted in the table.

General Themes

Comment	Response
Move to a three year document is welcomed as it enables longer term planning, consistency and greater certainty.	Noted
The National Framework document is shorter, more concise and strategic and in particular we note the reduction in the number of 'shoulds' and 'musts'. This approach is to be welcomed.	Noted
The proposed Departmental Strategic Objective should be amended to fully reflect the contribution FRAs and through them Communities and Local Government will make to improving local communities.	Communities and Local Government believes the contribution of the FRS to wider public service objectives is better reflected in the National Framework itself and in the delivery plans for relevant cross-cutting PSAs
Summary of objectives, stated as low , medium and high priorities would be of assistance	Communities and Local Government does not believe it appropriate to categorise objectives within the National Framework on this basis.
Lacks a longer-term integrated and strategic vision for the FRS.	Communities and Local Government, the LGA and CFOA published a joint vision for the FRS last year. The function of the National Framework is to provide a clear focus and set of national performance objectives for the CSR07 period.
The framework is silent on the actions that the Government will take at national level to promote fire safety and improve operational response services through engagement with other government bodies and the private and voluntary sectors.	Communities and Local Government continues to invest in the Fire Kills domestic fire safety campaign. In addition Communities and Local Government is contributing to cross cutting PSAs in the area of fire.
We would argue the case for the inclusion of a statement on the Framework by the Government of its commitment to the introduction of fire safe cigarettes across the European Union.	Noted. The text in Chapter 1 has been revised. In summary, fire safe cigarettes have significant potential for reducing fire deaths/injuries and fires in the home. During this CSR07 period we aim to lay the groundwork to develop and have a European Standard mandated in the UK.

Chapter 1

Prevention, Protection and Response

Paragraph	Comment	Response
Automatic Fire Alarms	Given the current divergence of operational standards arising from IRMP implementation Communities and Local Government should reinstate the ref to AFAs in the NF and the expectation that FRAs will follow existing guidance in the absence of an agreed national policy.	Noted. The text in Chapter 1 has been revised. Government has published guidance on reducing the number of false alarms from fire detection and fire alarm systems. More recently, CFOA has been working on updated guidance.
Co-responding	Communities and Local Government should clarify its expectations re co-responding in order to provide the Service with central support. Also helpful to have clear statement on DH's intentions on co-responding.	The introduction and maintenance of co-responding schemes is a matter for Fire and Rescue Authorities, based on local needs, risk and resources and discussion with partners. However, cross-Whitehall/ stakeholder discussions will be taking place, on the basis of the latest research, with a view to determining the feasibility and desirability of a national co-responding protocol, as recommended by the Select Committee on the Fire and Rescue Service.

Paragraph	Comment	Response
Research and statistics	Communities and Local Government should publish the full range of data it currently requires FRAs to submit otherwise difficult to see why FRAs should submit it.	A number of respondents questioned the value of the number of data sets that Government currently asks for from the Fire and Rescue Service. We are committed to regular review of that data that we collect to ensure that it remains relevant and useful for Communities and Local Government and wider stakeholders. The annual Fire Statistics Bulletin includes a considerable amount of data (over 100 pages with tables and charts); with headline statistics published each quarter. We also publish the operational statistics we collect.
Flooding	There is confusion over expectations and duties related to flooding. We believe govt. considers the two positions of a statutory duty and a general duty as being the same.	In his recent report Sir Ken Knight concludes that a statutory duty for the FRS to respond to flood related rescues is not needed, but that there should be a national flood rescue capability (boats, equipment etc) that could be used by a number of emergency responders including the FRS.
FSEC	Were RCC mobilising to be based purely on FSEC data and mobilising, this would remove the flexibility currently operating within IRMPs. Need some assurance that the use of the latter would not be negated by the use of the former.	The FSEC data requirements have been fully integrated into IRS during the data definition process. The outputs from IRS will be able to be exported in a format ready to be directly imported into FSEC. RCC mobilising will not be based on FSEC data.

Paragraph	Comment	Response
IRMPs	We would seek assurance that it is not the Government's intention to interpret the need for closer cross-border working as a sign of a need to develop a regional IRMP.	<p>Cross border working and regional collaboration are an effective means by which to deliver efficient services and improve resilience for major emergencies. It is up to Fire and Rescue Services working in partnership at a local and regional level to determine appropriate arrangements.</p> <p>Government has no plans to introduce regional IRMPs.</p>
Fire prevention	We believe that the Communities and Local Government's programme of investment for the provision of smoke alarms should continue beyond the current financial year. At present, no grant provision for this purpose has been announced.	<p>The Government has invested £25 million over four years to provide Fire and Rescue Authorities with direct capital grants to purchase smoke alarms under the Home Fire Risk Check initiative. This grant was only ever intended as pump priming and not an ongoing direct grant funding stream.</p> <p>However, fire prevention has been considered as a pressure in the level of Revenue Support Grant provided for Fire and Rescue Authorities. In addition many authorities have used resource made available through efficiency gains to mainstream community safety programmes.</p>
Regional Management Boards (RMBs)	RMBs have no jurisdiction re IRMPs so how will this work?	RMBs are joint committees established under local government legislation. Government remains committed to RMBs, which are ideally placed to take a regional overview and facilitate collaboration of constituent Fire and Rescue Services.
Local determination	National and local targets should be set for home fire risk checks (which include the provision of smoke detectors). This measure will reduce fire death, injury and fire damage.	It is for Fire and Rescue Authorities to determine the appropriate balance of prevention, protection and response measures through the IRMP process. It is for authorities to set any targets they consider appropriate in this area to address local risks.

Paragraph	Comment	Response
RRO	Support Communities and Local Government offering re RRO enforcement role should include practical implementation training with a view to achieving a good standard of consistency across the Service.	<p>Experience has shown that enforcement activity and approach varies across FRAs. As a result, Communities and Local Government produced the RR(FS)O Guidance Note No 1 in October 2007 which aimed to increase consistency where appropriate. We recognise, however, that inspection arrangements and enforcement policies are determined locally within the context of IRMPs.</p> <p>Communities and Local Government will evaluate the impact and effectiveness of the Fire Safety Order on the FRS, among others, in 2008 and use the conclusions from this to inform further policy development. In the meantime, we will continue to work with CFOA to improve consistency across the FRS.</p>
Sprinklers	We feel that there is still too much emphasis on the role of sprinklers and while a statement has been added saying that they are not a panacea they are still the only type of fire protection system mentioned in this paragraph. Equally fire detection and alarm systems, fire doors etc. could also be mentioned. We strongly believe that it is not the role of government or Fire and Rescue Authorities to promote one particular type of fire protection measure over another.	The primary focus of government policy on prevention measures remains life safety. There are a range of protection measures, including sprinkler systems, which may be utilised to reduce risk. It is recognised that the approach to fire protection within buildings must be balanced and appropriate to circumstance. We have sought to reflect this in Chapter 1 of the National Framework.

Chapter 2

Resilience

Paragraph	Comment	Response
FireControl	Respondents felt that it would be premature to shift responsibility for delivering RCCs from Regional Management Boards to FRAs.	<p>The previous Framework tasked FRAs, working through their RMBs, to fulfil a number of functions – including setting up their local authority controlled company.</p> <p>Text has been clarified in the new 2008/11 National Framework.</p> <p>We believe that RMBs play an important role in the delivery of the FiReControl project – and feedback has confirmed this. RMBs are an excellent forum to bring together FRAs in the region, and they enable effective partnership working.</p> <p>RMBs have, and should continue to, play a significant role in the development of the RCCs – including ensuring that the local authority controlled companies are set up.</p>
Regional Control Centres	There was concern expressed about the legal enforceability of requiring FRAs to nominate director(s) to their region's local authority controlled company.	<p>Communities and Local Government takes the role of the local authority controlled company very seriously – they will be the employers of control staff and there are a number of requirements on them in their role as a good employer. The earlier these are established the earlier effective planning and consultation can take place.</p> <p>For long term stability and certainty, particularly for staff, it is important that all FRAs make every effort possible to nominate their director(s), and to enable them to carry out the functions and duties effectively.</p>

Paragraph	Comment	Response
	<p>Concern has been expressed over Chief Fire Officers losing local control over their resources, making them less able to meet their obligations.</p>	<p>We do not accept this point. One of the aims of FiReControl is to enhance the capability of the FRS to continue to deliver a world class service.</p> <p>Chief Fire Officers will retain operational control-and-command during incidents; in the same way as they do now, and will have full control over their resources.</p> <p>We are working closely with Chief Fire Officers and others in the fire service, to ensure FiReControl meets their operational needs. Indeed, the central FiReControl team has around 30 secondees from the FRS helping to develop all aspects of the network.</p>
<p>New Dimensions</p>	<p>Need greater clarity re the current New Dimensions grant within the overall settlement.</p>	<p>The Government will continue to provide resource funding according to New Burdens principles, including long term maintenance. The funding mechanism will move in stages from grants under section 31 of the Local Government Act 2003 to inclusion in the Revenue Support Grant (RSG) in the medium term. Such a transfer would be a separate decision for the formula review, anticipated at the time of the next spending review, and subject to authorities' views at that time.</p>

Chapter 3

Diversity and Workplace

Please note that Communities and Local Government consulted on the Equality and Diversity Strategy separately; therefore the comments below are representative of the responses received as part of the consultation on the Framework. A separate consultation response on the Strategy will be published.

Paragraph	Comment	Response
Diversity	Women are being recruited, retained and progressed in roles that have direct front-line (service delivery) engagement eg advocates, arson, community safety, etc, therefore targets for women should include all delivery posts and not just Station (operationally) based.	Noted. This issue will be addressed in the response to the Consultation on the draft Fire and Rescue Service Equality and Diversity Strategy.
Criminal Records Bureau	The ref to the requirement for FRAs to conduct CRB checks on staff working with vulnerable people has been dropped – why is this?	CRB checks remain essential for staff working with children and vulnerable adults. The requirement is not included here as it is an established statutory requirement.
Pay Equality	UNISON agrees wholeheartedly with the ambition to ensure that staff "... are valued, treated fairly and with respect..." However, the Framework is then silent on how to achieve the aims across a still divided workforce. There is, in particular, no section on pay equality. This is a serious omission.	Equal Pay legislation is referred to within Chapter 4.
	Business case for diversity needs to be more at the fore.	Noted. This issue will be addressed in the response to the Consultation on the draft Fire and Rescue Service Equality and Diversity Strategy

Paragraph	Comment	Response
	Positive action initiatives should be developed and implemented to improve diversity in the workforce.	Positive action initiatives at local and regional level are an effective way of encouraging people from under represented groups to consider a career with the Fire and Rescue Service. Under the proposals within the Equality and Diversity Strategy FRAs will be expected to be able to demonstrate how they are undertaking such initiatives and the impact it has on recruitment of a more diverse workforce.
	Statement re strengthening industrial relations and communicating with staff could be expressed as "should".	Communities and Local Government considers that this is an issue for the Employers and the Trade Unions through the National Joint Council
	"Operational roles" should also include staff undertaking home fire safety visits and fire safety officers.	Noted. This issue will be addressed in the response to the Consultation on the draft Fire and Rescue Service Equality and Diversity Strategy
	UNISON is calling for a target of equality in rates of pay and reward between green and grey book staff as required by the Equal Pay Act.	Pay and terms and conditions are an employer's responsibility, negotiated through the National Joint Council.
Equality and Diversity	By placing this guidance in one chapter – on Diversity and Workforce rather than integrating throughout each of the 4 chapters of the document, or having it in a separate chapter, it looks as if equality and diversity is only relevant and can be tackled simply through an emphasis on workforce issues.	Noted. The text has been revised to emphasise the cross-cutting nature of the equality and diversity agenda.
Equality and Diversity	Suggest re-wording "graduate scheme" to "direct entry scheme".	The management development scheme is being developed both for graduate entrants and existing staff with high potential.

Paragraph	Comment	Response
Equality and Diversity	Why do FRA's have to produce a separate action plan on equality & diversity against this new national strategy, when all authorities will have already produced equality schemes? The national position should be linked.	The action plan is intended to bring together the different actions required under equalities legislation and the Equality Standard for Local Government, across all strands of equality.
Expectations of Staff	Communities and Local Government should take a lead in ensuring that brigade pay and reward systems are free from discrimination and compliant with equal pay legislation across the whole workforce.	Pay and terms and conditions are an employer's responsibility, negotiated through the National Joint Council.
Expectations of Staff	The core values referred to in this paragraph are very important, and they should therefore be referred to in the text rather than referenced in another document.	We have sought to reduce the length of the National Framework by referencing links to documents already published elsewhere where possible.
Expectations of Staff	It is recommended that guidance is provided to FRAs on the legal definition of an 'Extremist Group' and what constitutes 'membership.'	The text of the Framework has been amended to provide greater clarity on this issue.
Graduate entry schemes	How this will diversify workforces needs to be made more explicit.	The text of the Framework has been amended to provide greater clarity on this issue.
Graduate Programme	Phrase "professionalising the Service" not appropriate as implies it is not currently professional.	The text of the introduction of the Framework has been amended.
High Potential Development Scheme	Following previous consultation on this matter we are confused as to why this has been reintroduced in the NF.	The proposed scheme aims to support wider action to develop existing staff, increase the diversity and quality of applicants and strengthen leadership and specialist expertise in the Service.
Industrial Relations	UNISON welcomes the commitment to sound industrial relations in the service for "all staff". However, the "Joint Protocol for Good Industrial Relations in Fire and Rescue Service" is the property of the Fire and Rescue Service NJC and does not explicitly apply to the whole workforce.	The Framework refers only to 'nationally agreed protocols' – not to the Joint Protocol, but the Joint Protocol could be used at local level as the basis for industrial relations with all locally recognised unions, subject to the agreement of all parties.

Paragraph	Comment	Response
IPDS	IPDS not been validated therefore it is inappropriate to insist that the FRS must use all the products created through and as an outcome of IPDS.	The National Firefighter Selection and Assessment and Development Centre processes were impact assessed in development and assessment is continuing now they are in use. NFS is also being validated and as these results will not be known until the summer of 2008, the requirement to use NFS is subject to validation.
IPDS	The roll-out of IDPS has not addressed the gulf that separates the two sections of the workforce, and UNISON questions whether in fact IPDS has delivered for our members at all. Until and unless the Government gets to grips with the differentials that separate the two parts of the workforce the vision set out in the Framework will remain a wish list only. We are disappointed that our members continue to be referred to in the strategy as "other Fire Service Roles". We wish to re-emphasise that our members wish to be called "Fire and Rescue Service Staff".	Noted. The Framework encourages the benefits of IPDS to be made available to all staff. Noted. We have adopted this terminology as using 'FRS staff' as proposed would exclude operational and control room employees who are also FRS staff.
Leadership	There should be a clearer expectation that FRAs develop those with leadership responsibilities; it should be a requirement not an expectation.	The text indicates an expectation in this area. The E&D Strategy also stresses the importance of leadership and the need to develop leaders at all levels within the organisation.
National Firefighter Selection tests	Not a supporter of this.	The NFS process was subject to consultation and was supported by respondents. It was agreed by the Practitioners Forum, subject to review and a requirement in the last National Framework.
National Firefighter Selection tests	Welcome additional research, as experience of this process met with difficulties.	Noted – the research is under way. It includes a third party review of the process, impact assessment and validation.

Paragraph	Comment	Response
National Firefighter Selection tests and Assessment and Development Centre principles.	Both are expensive and in their current form are not totally appropriate for staff working the RDS. Adopting the principles of IPDS for all staff highlights problems with both its affordability and the lack of role maps for the non-uniformed staff.	The use of the National Firefighter Selection process for the recruitment of RDS staff was reviewed by the National Assessment Unit in 2007. They concluded that the test order could be changed to suit the pool of candidates, but that the tests must remain fundamentally the same for RDS and wholetime to achieve their objectives. ADCs have been designed to be delivered in flexible ways to ensure RDS staff is able to access them.
Performance Management	The requirement to put specific equality and diversity objectives into all IPDS outcomes is obscure.	E&D is already in the NOS and is a PQA in IPDS. The requirement is for an annual appraisal for all staff against personal annual objectives including an E&D objective in line with the E&D strategy.
RDS	Previous versions of the NF stated a requirement to implement the recommendations of the Retained Review Team. Therefore stronger wording to reflect RDS issues within the FRS needed.	Noted. The wording regarding the vital role which the RDS play has been amended in the Framework.
RDS	There is reference within a previous Framework to the requirement to implement the recommendations of the Retained Review Team report and to ensure that RDS staff has access to development opportunities. It is disappointing therefore to note that the text in the current draft Framework is less supportive of the need to address a wide range of RDS-specific issues within the service. FPA would therefore wish to see a review of the text within this and previous versions with a view to producing a more appropriate form of words that reflects RDS issues within the service and compels FRAs to take appropriate action.	Noted. The text on RDS retention issues, training and development has been expanded.

Paragraph	Comment	Response
Recruitment and Retention	National Firefighter tests still being evaluated therefore FRAs should only be “encouraged” to use them.	The requirement to use the National Firefighter Selection tests is subject to validation.
Recruitment and Retention	NF should state role govt will take in supporting FRAs re The Retained Duty System Review.	Government is supporting FRAs in a number of ways following the Review both at national level and local level eg the development of guidance and materials to support FRA engagement with local employers.
Training and Development	We do not support the creation of further IPDS role maps as they would not assist us in delivering more effective services.	We are not proposing that additional role maps are created.
Training and Development	UNISON is very disappointed that the draft Framework makes no mention of the potential for employers to work in partnership with recognised trade unions on training and development. UNISON asks that the draft Framework is amended to include an action for brigades to work in partnership with the recognised trade unions to facilitate union learning reps and union-run personal development opportunities and training courses.	Such statements are made in the Skills Pledge and in relation to Go Skills, which is supported by Government. So whilst we agree with the Unison comment we do not think it is necessary to repeat in this Framework.
Training and Development	Collating and disseminating risk-critical information on a national basis should be undertaken centrally – rather than it being assigned to individual FRAs through the NF.	We are considering the most appropriate methods for collating and disseminating information including that arising from significant safety events and Coroner’s inquests. We are consulting with stakeholders on these issues.

Paragraph	Comment	Response
Workforce Development	<p>It may not be practical to apply the full suite of national recruitment and development tools to RDS staff.</p> <p>IPDS has not delivered for our members in the Fire and Rescue Service. To continue to refer to IPDS as if it had relevance to the whole workforce is inaccurate.</p>	<p>There has been a review of NFS for RDS and there have some changes in how the test may be run. However, the tests must remain fundamentally the same for RDS and wholetime staff in order to achieve the tests objectives.</p> <p>ADCs have been designed to be delivered in flexible ways to cope with the availability of people wishing to join the RDS.</p>
Workforce Development	<p>This authority does not agree that it should be an absolute requirement to use National Firefighter Selection Tests, and Assessment and Development Centres.</p> <p>Do not believe that the full adoption of IPDS/ADC principles can be realistically achieved to maintain competencies for staff employed under the RDS, given the funding and availability pressures revolving around RDS staff.</p>	<p>This matter was the subject of national consultation in 2005 and the consensus was for NFS and ADC to be a requirement.</p>
Workforce Planning	<p>Should this include volunteer workers as we have several, and schemes we have planned will bring more into the service?</p>	<p>It does not include volunteers as it is for each FRA to determine how they wish to handle such schemes.</p>
Workforce Planning	<p>It is recommended that the expression 'sick' be deleted from the Framework. The expression 'absence management' is more appropriate. Further explanation/ definition of 'non-operational roles' for operational staff to carry out is sought as currently these posts do not exist (and as a consequence have no role maps) in the majority of FRAs.</p>	<p>Agreed – the term 'attendance management' will be used.</p>

Paragraph	Comment	Response
Workforce Planning	In particular there needs to be greater clarity regarding the definitions surrounding redeployment and retirement (the recent London cases illustrate this well). Secondly there should be a means by which members of the FPS can preserve their accrued pension benefits by the provision of a certificate. This facility already exists for members of the LGPS.	<p>The decisions of the boards of medical referees in the recent London cases are subject to Judicial Review. The substantive hearing took place on 6th and 7th March and a decision is expected in April. Ministers will consider whether any changes are needed to the relevant provisions of the Firefighters' Pension Scheme once the judgment of the High Court is available.</p> <p>A provision protecting accrued pension rights was included in the Firefighters' Pension Scheme 1992 by the Firefighters' Pension Scheme (Amendment)(England) Order 2008 (SI 2008 No. 214). Equivalent protection was already available at Part 3, article 7 of the New Firefighters' Pension Scheme 2006.</p>
Workforce Planning	Given the importance of providing for the wellbeing of their staff through a professional Human Resources function and considering the organisational risk presented by a failure to do so; should this not be a must instead of a should requirement.	This is a 'should' because it is a requirement but it is for the FRA to determine how best to achieve it.
Workforce Planning	Would welcome a statement in the NF setting out the Govt's aspirations for the FRS to up-skill its workforce and diversify its staff and competence base to deliver the new agenda.	The skills agenda is fully set out in the Leitch report and it is referred to in Para 3.26.

Paragraph	Comment	Response
	<p>The National Framework states that FRAs must share "... risk critical information on a regional/ national basis when appropriate". The business case for this to happen is completely sound, but LFEPA is concerned that it is not possible to operationalise it as a requirement because no framework or mechanism exists to enable FRAs to do so. We believe that Communities and Local Government should address this gap.</p>	<p>We are considering the most appropriate methods for collating and disseminating information including that arising from significant safety events and Coroner's inquests. We are consulting with stakeholders on these issues.</p>
Violence at work	<p>Policy should be produced in light of increasing no. of attacked on crews.</p>	<p>It is agreed that all stakeholders including Communities and Local Government need to discuss the way forward on this issue so it is not appropriate to include in the National Framework at this point.</p>
BME	<p>Stats should be published.</p>	<p>National statistics are already published. In future annual reports on the Equality and Diversity Strategy will include data on BME recruitment and existing staff by FRA.</p>

Chapter 4

Governance and Improvement

Paragraph	Comment	Response
Asset Management	Gives the impression that Asset Management Planning is static and awaiting further guidance. This seems at odds with Communities and Local Government guidance issued during 2006 in conjunction with the RICS which identified the essential drivers for AMPs.	Noted. We have clarified this issue in Chapter 4 of the National Framework.
CFRAU	CFRAU role still ill-defined	The role of CFRAU is set out in Chapter 4 of the National Framework.
Efficiency	There are concerns about the accuracy of counting efficiency savings achieved collectively via the Regional Management Boards (RMBs). The Authority therefore proposes that these are identified separately against each authority's own efficiency targets as well as being reported through the RMB.	Noted. We will ensure that guidance issued on CSR07 efficiency reporting is clear on this point.

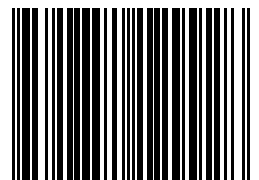
Paragraph	Comment	Response
FireBuy	Does not accept that it is appropriate for Communities and Local Government to require FRAs to submit a business case to Communities and Local Government to gain approval to extend existing contracts (or before letting new ones) "outside the national framework agreements arranged through FireBuy Ltd".	The 2008/11 National Framework requires Fire & Rescue Authorities (FRAs) to submit a business case to Communities and Local Government to gain approval if they want to put in place a new or extend an existing contract outside the National Agreements arranged through Firebuy Ltd. This is in line with Central Government expectations (HM Treasury and Office of Government Commerce – Transforming Government Procurement – January 2007) that sectors will collaborate for similar commodities and use national contracts where available. This will help to improve procurement through a more efficient process and deliver better value for money. If FRAs believe that the national contracts will not provide them with value for money on this basis then alternative arrangements can be agreed where justified in a business case.
	It would also be helpful to indicate that any procurement that the Fire and Rescue Authority makes through Firebuy is automatically registered as an efficiency saving and, therefore, a contribution to the overall efficiency targets.	Fire and Rescue Authorities should report procurement efficiencies through the established AES process.
LAAs	As the new partnership landscape around Comprehensive Area Assessment and Local Area Agreements develops, there is a need to ensure that councils and other partners at local level recognise the contribution that FRAs can make to partnerships, beyond their core emergency role. There is a role for central government to play in promoting more widely across government the role that FRAs can play in the local partnership context.	This is set out in the National Framework and in more detail in the "LAA Toolkit" referenced in Chapter 4. Communities and Local Government is also in discussion with other Government Departments to ensure the role of the FRS is appropriately recognised in cross-cutting PSAs.

Paragraph	Comment	Response
Pay	What influence can an authority have when pay is negotiated nationally?	The LGE negotiates pay and terms and conditions on behalf of the LGA through the National Joint Council (NJC) for Local Authority Fire and Rescue Services. Fire and Rescue Authorities can influence the LGA through the Fire Services Management Committee and the Fire Forum, to which all English authorities are invited. Both these bodies can express views to LGA representatives on the NJC.
Performance Assessment	The data FRAs are required to collect for Communities and Local Government does not match data set required to effectively manage performance and is an unnecessary burden.	The number of national indicators applying to the FRS has been reduced from 19 BVPIs to 2 indicators within the national set for local government. Both measure core outcomes for the FRS. National statistics are addressed in this table under Chapter 1.
RMBs	Clarify the distinction between the role of RMBs and the roles of Local and Regional Resilience fora.	Noted. Now reflected in the text of Chapter 4.
	Rather than a separate formal review of future opportunities, it is more constructive for the RMB business plan to identify further opportunities for both sub-regional and inter-regional collaboration.	Communities and Local Government regards RMBs as appropriate fora for review of opportunities for improved efficiency and effectiveness through collaboration. It provides a potential means for sub-regional and inter-regional review should member FRAs wish to use it for these purposes.
	Whilst closer joint working at a regional or sub-regional level can play a role in improving efficiency, the LGA strongly resists any moves that could be perceived as a step towards a regional fire service.	Government has no plans to introduce a regional fire service.
	We would oppose any imposition of additional duties and responsibilities on RMBs.	Noted.

Paragraph	Comment	Response
Statistics	On performance management, the data collected by Communities and Local Government does not match data collected by West mids FRA.	The data FRS's are required to collect is periodically reviewed to ensure it is relevant to the needs of all stakeholders including FRS and central government, and is not a burden. The fire incident data set (currently collected via the FDR1) was subject to an extensive review as part of the development of the new incident recording system (IRS), to ensure the data items collected were appropriate. We are also committed to review the IRS data collection each year. The data collected on FRS organisations and operations (eg equality and diversity, staffing) is also reviewed periodically to ensure it is relevant in terms of content and appropriate in terms of burden"
Statistics		The data used for N133 and NI49 will come from the fire incident collection (currently collected via the FDR1 form; to be collected via the electronic incident recording (IRS) system for all FRS's from April 2009). This data is already collected and analysed on a quarterly basis by Communities and Local Government. Therefore any different reporting for fire indicators will not affect FRS.

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