

Government's Response to consultation on Draft FRS National Framework 2004/05

On 5th May 2006 the responsibilities of the Office of the Deputy Prime Minister (ODPM) transferred to the Department for Communities and Local Government.

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Introduction

The Office of the Deputy Prime Minister published the draft 2004/05 Fire and Rescue National Framework on 11 December 2003. In the introduction Rt. Hon. Nick Raynsford MP, Minister for the Fire and Rescue Service invited comments and suggestions on the draft Framework.

ODPM undertook consultation on the draft National Framework according to the Cabinet Office's Code of Practice on Consultation¹. The consultation ran for 12 weeks ending on 14 March 2004. Efforts were also made to consider responses received after this date.

In total, 59 responses to the draft National Framework were received. In addition, views expressed at 9 regional focus groups for Chief Fire Officers, designed in part, to discuss the draft National Framework and held during the consultation period were considered. The response is divided into comments received on each chapter of the draft National Framework. Responses were received from a wide range of individuals and organisations. They can be broken down as follows:

Type of Organisation	Number of responses
Fire and Rescue Services	7
Fire and Rescue Authorities	23
Regional Management Boards	3
Employee Representatives	9
Charities and NGOs	6
Commercial Organisations	5
Members of the Public	3
Other Stakeholders	3

¹ <http://www.cabinet-office.gov.uk/regulation/consultation/code.asp>

Overview

Respondents were generally supportive of the draft National Framework and welcomed the opportunity to comment on it through the consultation process.

The majority of respondents supported the principles of the National Framework and felt that the scope and tone of the document was appropriate.

The draft National Framework's focus on prevention was welcomed as better reflecting the role of the Fire and Rescue Service. However there was concern that the National Framework was overly prescriptive in parts. Generally, the scope of the document was welcomed.

Many also welcomed the 'dynamic' status of the document and commented helpfully regarding proposed publication dates for the National Framework, requesting that future versions be published in the Autumn to enable Fire and Rescue Authorities to take full account of the National Framework in their annual budgeting process.

General themes

	Paragraph	Comment	Response
1		The Framework should cover "industrial relations".	Industrial relations are a matter for employers and workforce representatives. However, Government has a legitimate interest in ensuring that the Fire and Rescue Service (FRS) achieves its objectives and that levels of pay are affordable. Clause 32 of the Fire and Rescue Services Bill will allow Government to set out formally all of the factors it wants the negotiating body to take into account when trying to reach agreement.
2		The Framework should focus on outcomes. There is a tension between prescription and the discretion the Framework claims for Fire and Rescue Authorities (FRAs) to deliver tailored local solutions.	The Framework incorporates requirements on key national performance issues, on which the Fire and Rescue Services (FRS) Bill will require them to have regard. On most issues it will be a matter for FRAs to decide how to meet the objectives of the Framework in line with local needs. The FRS Bill gives the Secretary of State power to intervene where he considers an authority is, or is likely to, fail to meet the public service requirements set out in the Framework. <u>The intervention powers are very much a last resort.</u>
3		The Framework should cross-refer to the Fire and Rescue Services Bill and the Civil Contingencies Bill.	Where relevant the National Framework clearly cross refers to legislation.
4		The Framework fails to recognise the differences between urban and rural services (particularly with reference to efficiency savings).	The move away from national standards towards Integrated Risk Management Plans (IRMPs) has given all FRAs the ability to better target resources at locally identified risks in a cost-effective manner. However, we recognise that the costs and savings of modernisation may fall unevenly across FRAs. We have therefore asked a working

			group of officials, including the Local Government Association (LGA) and representatives from FRAs, to examine the case for change and possible alternatives to the existing Fire Formula Spending Share (FSS) that might better reflect FRAs' needs.
5		How will Government consult on future Frameworks?	The Government will consult according to the Cabinet Office Code of Practice on Consultation through the new consultative forums and written guidance where appropriate. In the next few years modernisation will continue apace and frequent changes to the Framework are therefore more likely. But in the future major changes are likely to occur less frequently and it may not be necessary to revise the Framework on an annual basis.
6		The Framework fails to recognise much of the good work already being done by many fire and rescue services.	We greatly appreciate the valuable contribution to public protection made by all members of the Fire and Rescue Service. Our emergency services are rightly held in high regard. Further recognition of achievement will come through the Audit Commission's Comprehensive Performance Assessment (CPA) process.
7		The scale of the modernisation agenda and the current timetable is unrealistic, particularly within current resources. Government should prioritise.	The first Audit Commission report, entitled <i>Verification of the Progress of Modernisation</i> , indicates that some progress is being made, but that there is still more to do as might be expected at this stage of a major modernisation programme. FRAs, through the LGA, have said that the costs and savings of modernisation will balance over the Spending Review (2003/04-2005/06) period. There has also been a 28% increase in core expenditure provision for fire and rescue services since 1997, from £1,237m to £1,583m in 2003, a

			<p>year-on-year increase of over 4% - a real increase in provision. In 2004/05, authorities have received an average increase of 4.2% and no authority got less than a 3.5% increase. The Government will also distribute £61.68m in supported capital expenditure in 2004/05.</p> <p>The National Framework sets out priorities and objectives for FRAs.</p>
8		Government should list its own responsibilities.	The National Framework includes details about Government's responsibilities.
9		Revised versions of the Framework should be published annually and in advance of local government budget setting rounds.	The Government will aim to publish revised versions of the Framework in the Autumn to help authorities assimilate it into their financial and business planning processes.
10		It will be essential to maintain fire - buildings relationship.	Government agrees that this relationship must be maintained. The objectives of the Building Regulations are to ensure the health, safety, welfare and convenience of people in and around buildings. This includes 'designing in' fire safety. The National Framework reflects the importance and benefits of FRAs maintaining and developing relationships with their stakeholders at local levels and building upon lessons learned in achieving these objectives.

Chapter 1 - Risk management & prevention

	Paragraph	Comment	Response
1	General comment	General support for replacement of national standards and greater focus on prevention.	Government welcomes this support.
2	General comment	<p>New approach should be underpinned by national policy and national standards and performance indicators.</p> <p>Concern was expressed that the move away from national standards could fragment fire cover.</p>	<p>Local responsiveness does not equal fragmentation. There is no suggestion that changed fire cover arrangements will be inadequate; the reverse is true. They will meet local needs in a way the old national standards did not. The move away from national standards towards IRMPs has given all FRAs the ability better to target resources at locally identified risks in a cost-effective manner. IRMPs make sure emergency cover and response is determined locally and provided on a risk to life, not a risk to property basis. They mean that more resources will be put into prevention through community safety initiatives - changing people's behaviour to stop fire and other incidents from happening in the first place. Performance indicators have an important role in providing a broad diagnostic tool for both local performance management and independent performance assessment.</p>
3	General comment	Zero fire deaths should be the national target.	We agree that zero <u>preventable</u> fire deaths should be the aim. The Government's target for the current spending review period is a step towards that long-term objective. It is both achievable and challenging.
4	General comment	The National Framework does not sufficiently recognise the importance of Community Fire Safety and statutory enforcement in prevention.	This is a matter of degree. The National Framework will give sufficient prominence to these aspects of fire safety to meet its purpose.
5	General comment	Absence of powers of wellbeing limits effectiveness	The FRS Bill provides FRAs with sufficient new powers to discharge

		of FRAs, especially partnership-building.	their functions. In particular, clauses 5, 6, 11 and 12 of the FRS Bill grant all FRAs wide discretion to respond to local needs. No specific examples have been provided to date of where powers of wellbeing would address a shortfall in this new suite of powers in terms of FRAs discharging functions.
6	General comment	The Framework should be used to outline potential for the Fire & Rescue Service to contribute to wider community.	In the FRS Bill the Government has distinguished between the core duties of FRAs and their other functions. The National Framework sets out the Government's priorities for the FRS, so it is right that it should focus on those functions that will be mandatory for the FRS, rather than those elements of its work that will remain discretionary. The Framework should not, however, preclude FRAs from contributing on a wider canvas, and we have ensured that it acknowledges the potential role of the FRS in the wider community agenda.
7	IRMPs	How are IRMPs and a regional approach reconciled?	There is some concern that it will not be possible to deliver differing local mobilising policies through a regional control, but the technology and training will, in fact, make this possible. The implications of regional control for IRMPs are being looked at as part of the control centres project (see answer no. 23 to chapter 2). We welcome the initiative already taken by some Regional Management Boards (RMBs) to examine regional implications of constituent FRAs' IRMPs.
8	IRMPs	Good practice from round 1 of IRMPs must be identified and disseminated in good time for round 2.	This is happening. The Implementation Support Teams (ISTs) continue to operate in year 2 and have already given feedback to all FRAs including emerging good practice.
9	IRMPs	The IRMP consultation	Experience of the costs incurred in

		process is onerous and costly.	consulting on year 1 plans is very variable - it will depend on the approach adopted by the authority. An adept press department tends to incur less cost than hiring consultants to run the consultation.
10	IRMPs	Approval of IRMPs but concerns about lack of time to prepare or pilot.	All plans are now in place and all FRAs met the deadlines.
11	IRMPs	IRMPs balance needs of intervention and prevention through resource allocation. Is intervention 'ring-fenced'?	It is for each FRA to ensure that they have appropriate and adequate response arrangements and to balance the distribution of resources between prevention and response.
12	IRMPs	A common, national approach to guidance on IRMPs and setting benchmarks is required.	Guidance was issued prior to the start of the year 1 process and will be refined as the need arises. Guidance on technical issues is being issued on an ongoing basis. Development of a new suite of Best Value Performance Indicators (BVPIs) is in hand.
13	IRMPs	IRMPs must become part of corporate and budget planning cycles. Consultation timetables for IRMPs should be linked to Best Value Performance Plans (BVPPs).	We are sympathetic to the administrative burden placed on FRAs but IRMP proposals can have a significant impact on budget plans and need to be tied to that round of planning rather than any other. Guidance has been issued to ensure that action plans are tied in with the budget planning cycle. BVPPs focus on a 3-year horizon and so cannot be directly keyed to annual IRMP action plans.
14	IRMPs	Government should rationalise requirements for Service plans. Perhaps a 3-year cycle for IRMPs?	We do not accept that a 3-year plan is likely to be more beneficial. FRAs can already plan for the medium term but need to have clearly identified milestones for delivery to ensure that modernisation is delivered in a planned and managed way.
15	IRMPs	Framework should specify whom FRAs should involve in agreeing IRMPs.	It is the authority that agrees the IRMP after it has consulted with stakeholders. Guidance has already been issued on how authorities should carry out the consultation process and who

			should be consulted.
16	IRMPs	FRAAs will need greater support for IRMPs than simply the Fire Service Emergency Cover (FSEC) toolkit.	Accepted - the ISTs remain in place for year 2 and the expertise of Her Majesty's Fire Service Inspectorate (HMFSI) is available to FRAs. The Office of the Deputy Prime Minister (ODPM) intends to issue good practice guidance and to advise on specific issues as needed.
17	IRMPs	Many round 1 IRMPs failed to mention retained firefighters.	We expect that FRAs will be better placed to consider the role that staff on the retained duty system can play in year 2 plans.
18	Community Fire Safety (Para. 1.9 - 1.16)	Community Fire Safety (CFS) Innovation Fund creates a perverse incentive.	Poor households and deprived communities are most at risk from fire. That is why the White Paper target on accidental fire deaths includes a floor element - to ensure that no FRA area suffers deaths more than a quarter above the average by 2010. To support the achievement of this target we have given FRAs with a fatality rate above average a one-off increase in resources in the period 2003-6 through the Innovation Fund. This distribution method may seem inequitable to those FRAs that have done well in the past in driving down fire deaths but there has to be a balance between equity and directing money where it is most needed. We are reviewing the future of the Fund in the Spending Review 2004.
19	Community Fire Safety	CFS Innovation Fund and Arson Control Forum Implementation Fund monies should be incorporated into the revenue grant.	The CFS Innovation Fund was set up before FRAs had a statutory responsibility for community fire safety to help meet the new floor element in the accidental fire deaths target which was announced in the White Paper. We will review its future in the context of the Spending Review 2004, in the light of the FRS Bill which will give FRAs the statutory duty to promote fire safety, and the introduction of IRMPs, which give

			<p>FRAs more freedom to allocate resources on the basis of risk.</p> <p>We agree that CFS work should be funded from the Revenue Support Grant and Council Tax. The FSS formula in the revenue grant provides the basic continuing funding for all FRAs to engage in CFS and arson reduction work. We have increased the proportion attributable to CFS and arson in the FSS from 0.5% to 3% from Spring 2003.</p> <p>We will review the future of the Arson Fund in the context of the Spending Review 2004, the new statutory duty to promote fire safety, and the introduction of IRMPs, which give FRAs more freedom to allocate resources on the basis of risk. But it must be remembered that arson is a shared responsibility with the police and other agencies, and a specific source of funds should help to lever in money from these bodies.</p>
20	Community Fire Safety	Remove the word "fire" and broaden scope covered in this section of Framework.	<p>The FRS Bill establishes a new framework of powers and duties that provide a clear statement on FRAs' new role. This strikes a balance between a series of core duties that all FRAs must provide for and discretion for individual FRAs to respond to local risks and priorities identified, for example in an IRMP. The FRS Bill therefore ensures the FRS can make an efficient and effective contribution to helping make communities safer. In so doing it recognises that other aspects of public safety are matters on which other emergency services and agencies quite rightly lead.</p>
21	Community Fire Safety	All elements of this chapter should be captured under title of prevention. They are interdependent.	<p>We agree, and have titled Chapter 1 of the National Framework "<u>Fire Prevention and Risk Management</u>".</p>

22	Community Fire Safety	CFS is resource dependent and intensive. There is a need to focus on the vulnerable.	CFS work must be targeted on those most at risk. It is hard to measure immediate impact but essential to plan, resource and evaluate a long term programme. The National Framework reflects this.
23	Community Fire Safety	Information on socio-economic factors should be more widely available.	ODPM research and background information, including Indices of Multiple Deprivation and the British Crime Survey, is freely available through the ODPM Website (www.communities.gov.uk) and in the CFS Toolbox.
24	Community Fire Safety	What is anti-social behaviour?	<p>There are various definitions of Anti-Social Behaviour but the Home Office (HO) White Paper <i>Reclaiming Our Communities</i> defines it as:</p> <p><i>"the low level disorder and lack of thinking by people that puts their own wishes first, and impacts on the quality of life of others in the following ways: making people frightened to leave their homes due to fear of intimidation or bullying because of their race, colour, sexual orientation or the family or area from which they come; noisy neighbours or loud parties; teenagers hanging around menacingly on the streets; rubbish and litter lying around making an area filthy and degrading; abandoned cars clogging the streets; graffiti and vandalism, people using or dealing drugs; people being drunk or rowdy...; and road rage.... "</i></p>
25	Community Fire Safety	A statutory requirement for smoke detectors should be introduced.	We want as many homes as possible to have a working smoke alarm, and we are pursuing a proactive strategy to ensure this happens. The National Community Fire Safety Centre (NCFSC) will continue to promote smoke alarms through high profile television

			<p>campaigns.</p> <p>Since 1992 all new dwellings in England and Wales have been required to have a smoke alarm installed, a provision which is enforced through the building control system. We do not believe that it is practical to require smoke alarms in domestic buildings built before 1992. We believe it would infringe too severely on the rights of individual householders as to what they can and cannot do with their own homes. There is also no practical way of enforcing such a requirement. We issued guidance on smoke alarms to social landlords in 2001. In addition the Housing Bill will enable local housing authorities to require appropriate measures, including installation of smoke alarms, to be taken to deal with risks from fire in all dwellings.</p>
26	Community Fire Safety	The Government should consider central funding for smoke detector provision.	Funding issues such as this are a matter for the Spending Review.
27	Arson reduction (Para. 1.17 - 1.23)	Arson reduction and fire investigation information should be better linked.	We are reviewing the arrangements for the collection and management of fire statistics to improve our knowledge of the causes of fire and its physical and human effects. We are also developing model protocols and Memoranda of Understanding in respect of data sharing and supporting these by developing standards in fire investigation training for the FRS and other key stakeholders.
28	Arson reduction	Arson is not high on the Police agenda. How do ODPM and HO co-ordinate (e.g. arson recording mechanisms)?	Firefighters and the police already work together at the local level through dedicated arson task forces, many of which funded by the Arson Control Forum (ACF). FRAs were made Responsible Authorities within Crime and Disorder Reduction Partnerships

			<p>(Community Safety Partnerships in Wales) with effect from 1 April 2003, which will enable the FRS to make an effective contribution to local crime and disorder strategies, including raising the profile of arson.</p> <p>The new Chair of the ACF is a senior police officer. This will help us to engage the police closely. Research on terminology and agreed recording mechanisms is in hand.</p>
29	Arson reduction	The Arson Control Forum has been relatively unsuccessful. A new national fire safety body should be created.	The ACF is important in bringing together at a high level the Police and FRS in tackling a particularly unpleasant crime. Recent statistics show that after a 40% increase over 4 years, a reduction in deliberate fires appears to have begun. The reduction was 3% in year ending June 2003. The Government does not intend to create a national fire safety body. The institutional framework for the FRS was considered carefully in 2003 and our conclusions set out in White Paper published in June 2003.
30	Arson reduction	Arson reduction work provides an opportunity for retained firefighters to add value especially in Youth Work.	Firefighters on the retained duty system and external volunteers already make a very valuable contribution to CFS and arson reduction, including work with children and young people. It will be for local decision how far this can be expanded. The Retained Review will include an examination of community participation and role.
31	Arson reduction	The bidding process for specific arson funding is inequitable.	The ACF New Projects and Implementation Funds have provided additional funding awarded through an open and objective bidding process to develop and implement good practice.
32	Arson reduction	A BVPI for secondary fires should be introduced.	The Performance Indicators Working Group (PIWG) has

			proposed an expansion of BV206 which incorporates deliberate secondary fires. Subject to consultation this will be introduced for 2005/06.
33	Building Regulations (Para. 1.24 - 1.26)	The National Framework should give clear indication of Government's intention to legislate on sprinklers.	A number of respondents raised the issue of sprinklers and the need for their greater provision within buildings. Importantly, a number also pointed out that fire safety is achieved by means of a package of measures and not just sprinklers. The Government is committed to reviewing policy in this particular area by means of a fundamental review of the fire safety aspects of the Building Regulations, and the technical guidance that supports them, which is currently underway. As part of the review we will be considering the recent work undertaken by the Building Research Establishment (BRE) on the effectiveness of residential sprinklers. The revision of the fire safety aspects of the Building Regulations will be subject to public consultation and the preparation of a supporting Regulatory Impact Assessment.
34	Building Regulations	There is scope for improving consultation with FRAs concerning Approved Inspectors.	ODPM publish the 'Building Regulations and Fire Safety - Procedural Guidance'. This document provides guidance to Building Control Bodies and the FRAs on the steps involved in approving the fire safety aspects of building work. A review of this important document has now commenced and therefore we will be looking to see how the process for securing an effective dialogue can be achieved. We hope to publish a revised version to coincide with the implementation of the Regulatory Reform Order (RRO).
35	RRO (Para. 1.28 - 1.30)	Should FRAs be allowed to charge for "giving advice"?	We do not propose allowing FRAs to charge for fire safety advice.

			<p>There is no objection, in principle, to allowing them to charge for what amounts to detailed consultancy advice, which is typically given to the operators of a commercial undertaking. We invited specific comment on this topic in the consultation document on charging as it has long been recognised that there are some difficulties in deciding how to draw the distinction between these two classes of advice in practice, and how to handle any potential conflicts of interest.</p>
36	RRO	<p>Removal of certification will reduce support for managers/occupiers and create greater workload for FRAs.</p>	<p>The RRO will simplify the regime but not fundamentally change it, because managers and occupiers are already subject to a regime based on the requirement that they undertake risk assessments under the Fire Precautions (Workplace) Regulations 1997 (as amended). Fire certificates are currently issued taking into account employers' risk assessments, not on the basis of the FRAs' assessments. So the RRO will not change the level of support to managers and occupiers, but will relieve them of a burden as fire certificates will no longer be needed and other legal overlaps are removed. The workload for FRAs will be reduced accordingly.</p>
37	RRO	<p>The RRO is significant. Why does it merit only 3 lines in the Framework?</p>	<p>The RRO will set up a statutory framework in its own right, so it is included in the Framework for context, and given 3 paragraphs because the Government recognises its importance.</p>
38	RRO	<p>ODPM should produce guidance on prioritising fire safety inspections.</p>	<p>This was promised in the draft Framework, and has now been implemented. The guidance published in January 2004 about risk-based enforcement provides information about prioritising inspection. It is based on the research carried out for the review</p>

			<p>of Fire Cover. It was issued as IRMP guidance and forms only one of the risk factors to be considered as part of the FRA's IRMP addressing risk to the community as a whole. Paragraph 4.4 of the guidance particularly notes the need to take other factors into account when developing a risk based enforcement programme.</p>
39	RRO	FRAs do not have skills to advise on risk management.	<p>The FRAs have some of the best-qualified personnel in the country. They have been developing their expertise through application and enforcement of the fire regulations. There is no better qualified body to enforce the RRO. It is the Government's policy, following reviews of enforcement and fire law, that FRAs should be the enforcer for general fire safety. It will be the responsibility of FRAs to ensure that suitably trained people undertake this work. These need not necessarily be employees of the FRA.</p>
40	RRO	Why is there is no duty to publish safety enforcement strategies?	<p>An IRMP (which is itself a requirement of the National Framework) requires preparation of a fire safety inspection programme (see paragraph 3 of IRMP Guidance Note 4), so a specific statutory duty in primary legislation is not considered necessary. The Independent Review of the Fire Service took the proposal a step further by recommending that the Government should instruct each FRA to develop a risk management plan that would cover how the authority would address risks in their area - beyond just statutory fire safety. It added that the Government should provide guidance. Since then of course, IRMP has been developed.</p> <p>Paragraph 3 of IRMP Guidance note 4 (Fire Precautions Act</p>

			<p>Circular 29) states "The fire safety inspection programme of fire authorities will form part of their Integrated Risk Management Plan". So, development of IRMPs require the production of a formal programme of inspection. The Framework requires development of IRMPs. And the FRS Bill will require authorities to "have regard" to the Framework. We do not therefore propose a separate specific statutory duty.</p>
41	RRO	Fire Service College (FSC) should offer specific training courses.	We would expect a wide variety of training institutions to offer relevant courses.
42	RRO	Government should consider the use of penalty notices.	Use of penalty notices was considered during the development of the RRO. The proposal found little support from enforcers or stakeholders.
43	Crown Premises (Para. 1.31 - 1.33)	The separate inspection system for Crown premises should be removed.	Government will continue to seek a legislative opportunity to remove Crown Immunity from enforcement of both fire safety and general health and safety legislation, and keep the question of who should enforce the law under review.

Chapter 2 - Working together: the regional approach

	Paragraph	Comment	Response
1	General Comment (Para. 2.1 - 2.8)	Recognise the improvements in efficiency and effectiveness that a regional approach offers in some areas (e.g. large-scale incidents / procurement).	Government welcomes this support.
2	General Comment	The draft National Framework fails to recognise different types of authority or existing collaboration.	Collaboration is currently patchy, as the Independent Review of the Fire Service found. A more systematic approach is needed, which the Framework sets out. Government is using the FRS Bill to address differences in powers to ensure that all types of FRA have sufficient local flexibility and discretion to discharge their functions.
3	General Comment	Government should "come clean" about its regional agenda. What is the Government's objective?	Government has no plans to "regionalise" the FRS in non-Elected Regional Assembly (ERA) areas. Ministers have made clear during the passage of the FRS Bill the limited grounds on which they will seek to combine FRAs - that is: economy, efficiency and effectiveness or public safety. The National Framework has been amended to reflect this.
4	General Comment	There is tension between responsibilities and accountability structures of FRAs and RMBs.	FRAs continue to be responsible for their day-to-day local Fire and Rescue Service including any services managed on their behalf by the RMB. It is up to FRAs to settle the constitution of RMBs and how any perceived tensions are to be resolved, while securing the outcomes required by the National Framework
5	General Comment	It is unclear how a regional approach increases public safety.	A regional approach is essential to deliver the

			FiReControl project and Firelink, both of which are essential for national resilience. Getting the balance right between local, regional and national functions is essential, and the National Framework has a key role to play in achieving this.
6	General Comment	Effective co-operative performance will take time. Government should allow alternative collaboration where there is a case for it.	A number of earlier reports on the benefits of collaboration failed to deliver significant change. The regional boundaries are those used for civil resilience and many other purposes and this must be respected. Provided that the requirements of the National Framework are met in the six key areas, further collaborations are a matter for FRAs.
7	Functions of RMBs (Para. 2.9)	London Fire and Emergency Planning Authority (LFEPA) is <u>not</u> a useful regional model (particularly for rural areas).	We accept that the issues facing rural areas are very different from some of those that LFEPA must address. But the reference to LFEPA in paragraph 2.4 is a reference to the way LFEPA is overseen by the Greater London Authority. Regional Assemblies would have a similar relationship to their Regional Fire and Rescue Authority. Details will be spelt out when the draft ERA Bill is published for consultation later this year.
8	Functions of RMBs	Will Regional Management Boards be required to go beyond the functions listed at paragraph 2.9 of the draft National Framework?	There are no plans to require them to do so.
9	Functions of RMBs	Collaboration on special or common services should remain being determined by each RMB, rather than prescribed by national government.	It is accepted that prescription should be limited in this area. But we regard effective fire investigation as so important given the fight against arson

			that it is right to insist that this be done on a regional level. In relation to Health and Safety, the Framework only invites RMBs to share good practice and explore opportunities for effective collaboration. We do not propose to prescribe an approach for other common services for the time being.
10	Functions of RMBs	RMBs will create costly additional burden and bureaucracy without adding value.	RMBs should be light touch and delivery-oriented. NE and East of England have respectively allocated £15k/£25k per FRA for admin costs in first year. These are small amounts in relation both to overall budgets and potential economies of scale.
11	Functions of RMBs	RMBs' responsibilities should not go beyond those listed in the White Paper.	Requirements on RMBs in the National Framework do not go beyond the six key areas in the White Paper. However, Government would not wish to discourage further voluntary collaboration, e.g. on cross-regional dimension of IRMPs.
12	Functions of RMBs	Any collaboration should be voluntary, not compulsory.	Public safety is paramount. The Government is also committed to raising the performance and cost effectiveness of the FRS. The six key areas listed in paragraph 2.9 of the draft National Framework are those that can be delivered more efficiently and effectively at a regional level. The FRS's record of collaborating voluntarily has been patchy in the past. If the needs of public safety require urgent action - or audit evidence from fire CPA demonstrates a failure to achieve the 3 Es - the Government will consider the use of statutory powers to combine FRAs.

13	Functions of RMBs	RMBs should establish consultative/negotiating machinery with recognised trades unions.	The Government welcomes both formal consultation and informal discussion between employers and those representing their staff. However, RMBs are not employers - FRAs are. There is nothing to prevent employers and unions discussing cross-regional matters if both so wish.
14	Functions of RMBs	If Regional Management Boards are to be effective they must have a clear structure from the outset, and the have a clear and defined place in the structure, including properly delegated powers. Voluntary co-operation arrangements will not be sufficient.	The Government welcomes this support for its approach. Government has made clear it expects robust arrangements capable of delivering, and that it favours the sort of arrangements envisaged by this response. The main point is that outcomes must be achieved in the six identified areas.
15	Functions of RMBs	RMBs should be subject to CPA. Will there be national performance indicators to measure RMBs' performance?	The CPA process will assess the effectiveness of each FRA's contribution to the delivery of objectives through its RMB. PIWG is considering appropriate PIs to measure FRAs' performance in delivering their functions, including those delivered through RMBs.
16	Regional Control Rooms (Para 2.10 -2.16)	Confusion over the text of Framework and guidance in a Ministerial letter of 11 December 2003. In particular, what are ongoing funding arrangements?	The funding arrangements for regional control rooms, now known as regional control centres, are complex and issues develop as the FiReControl project progresses. A working group with local authority finance representatives has been set up to look into these and make recommendations. The outcome will be communicated in September.
17	Regional Control Rooms	Why consult on Regional Control Rooms if Government has already decided? What will be the role of RMBs?	The Government accepted the principle of regional fire control rooms, now known as control centres, and consulted

			<p>on the way forward. The responses broadly endorsed the Government's proposal and the project team is actively addressing the practical issues identified in the consultation. The Government is consulting stakeholders systematically as the project develops. RMBs have a central role in delivering the control centre for their region within a project structure that meets regional and national requirements.</p>
18	Regional Control Rooms	Won't regional controls conflict with <u>local</u> IRMPs?	<p>No. The practical issues are being addressed in the FiReControl project. (See answer to point 7, chapter 1 and point 23 in this chapter). We welcome the initiative already taken by some RMBs to examine cross-regional implications of constituent FRAs' IRMPs.</p>
19	Regional Control Rooms	The timetable for delivery is too demanding. Concern over fit with <i>Firelink</i> project, can the industry support simultaneous roll-out?	<p>Achieving a fit with the Firelink project is the most efficient option, and the two projects are being taken forward in close co-ordination to ensure operational fit and maximum efficiency. The contracted suppliers for both projects will be aware of the delivery requirements they have to achieve. It is not expected that there will be any problems with the capacity within the industry to deal with both. A migration strategy is being developed which will deal with all the issues and risks. The timetable is certainly stretching, but every effort is being made to keep to it to ensure that the benefits are delivered as quickly as possible.</p>

20	Regional Control Rooms	Need to acknowledge possible control room staff redundancies.	Fewer staff will be needed for control room duties when the new regional control centres are in place. Where at all possible authorities should re-deploy staff no longer needed for control centre work to other roles. They should also ensure retention of sufficient staff to manage individual control rooms until regional control centres have been established. Guidance on this issue was issued to Regional Project Teams in June 2004. The Integrated Personal Development System (IPDS) offers a route to equip staff with the skills they need for other work, for example on community fire safety or work elsewhere in local government. Transfer of Undertakings (Protection of Employment) Regulations 1981 (as amended) (TUPE) requirements will be observed where relevant.
21	Regional Control Rooms	Who will own the control buildings, hardware and software?	The intention is that the new control centres will be leased by a local authority body. The long-term ownership of the other assets created by the FiReControl project is under consideration. Work is in progress to develop potential structures and to include arrangements to ensure a central government role in renewal of the assets in the interests of national resilience.
22	Regional Control Rooms	Control rooms do more than the Government gives credit for.	The new regional control centres are being developed with a wide range of functions. The functions of existing control rooms and the proposed functions of the new regional control centres will

			be taken fully into account in preparing the business case.
23	Regional Control Rooms	A common regional mobilising protocol will be needed.	It will be technically straightforward for the new control centres to apply different mobilising approaches in different FRAs if that is what their IRMPs require. However, regional and national protocols to suit particular circumstances and to cover common approaches and procedures for resilience purposes will be worked up as part of the implementation process.
24	Procurement (Para 2.17 - 2.21)	Support for national procurement for efficiency/economies of scale.	Government welcomes this support.
25	Procurement	Restrictions on procurement are impractical. May conflict with Best Value.	We expect regional collaboration to lead to increased efficiencies in most areas. Fire Service Circular 11/04 was issued following the draft National Framework consultation exercise to clarify these issues. Where authorities perceive a Best Value conflict they have sought advice from ODPM. The National Procurement Strategy is due to be issued for consultation in the Summer.
26	Procurement	Concern that approach could lead to fewer suppliers and so slower delivery times.	Contracts let by a national procurement entity would take account of the need to secure continuing competition in the market. This is not the same as supporting weak or failing companies.
27	Procurement	What about New Dimension / resilience equipment?	New Dimension equipment is procured and paid for by ODPM. Longer-term New Dimension procurement will be considered in the light of the work being undertaken on a national strategy for fire and rescue service procurement.
28	Procurement	The Framework ignores	The distinction between

		procurement arrangements of county council FRAs.	county and single purpose FRAs is recognised in the interim procurement guidance - it excludes non-FRS specific materials and equipment. County FRAs may already have well structured and professional procurement arrangements drawing on general county council provision. There will still be a role for this expertise under procurement arms of the national strategy but there remains a need for national level action for major items of spend.
29	Procurement	The Government should produce its procurement strategy on time.	A consultation version, which incorporates further work on legal and technical issues, is being published in the Summer.

Chapter 3 - Effective response

	Paragraph	Comment	Response
1	Effective Response (Para 3.1 - 3.4)	Broad support for chapter and the wide remit it contains.	Government welcomes this support.
2	Effective Response	Standards of service delivery, particularly in terms of life, property and environmental protection, should be determined centrally.	IRMPs will set local standards where these are appropriate to local risks. ODPM will issue guidance to inform standard setting, but there is no intention to return to national standards.
3	Effective Response	Support view that need for effective response must not be diminished.	This is welcomed.
4	Effective Response	Will there be national civil resilience guidance, e.g. on the importance of certain buildings?	There is already well-established guidance on civil resilience contained in the Cabinet Office (CCS) guidance "Dealing with Disaster". This was revised in 2003 and a new edition will be produced once the Civil Contingencies Bill is enacted. Issues such as the importance of certain buildings will be determined locally in the knowledge that regional and national support arrangements are available if required.
5	Incident Management Protocols	Is there a need for a Memorandum of Understanding (MoU) with the Police in respect of large-scale disasters?	There are no plans for any extension of charging at this stage, and we have undertaken to consult on any proposed extension.
6	Utilisation of resources (Para 3.9 - 3.14)	Can FRAs charge for attending false Automated Fire Alarms (AFA) alarms?	The National Framework sets out the priorities and objectives for the FRS that the Government wishes to set centrally, taking account of the core duties of FRAs set out in the FRS Bill and in other legislation. FRAs themselves should decide - through the IRMP process - how to use the discretionary powers set out in
7	Utilisation of resources	Could future Frameworks cover the assistance FRAs should give other agencies towards achieving their objectives under the wider community safety agenda?	

			the FRS Bill to further the wider community safety agenda. Generally speaking, the Framework does not cover these. The Framework's invitation to consider co-responder schemes is an exception, because of the prominence given to the issue by the Independent Review of the Fire Service.
8	Utilisation of resources	Economic, social and environmental concerns <u>must</u> be given equal consideration to risk to life and injury when deciding how to direct resources.	In considering how to direct their resources through the IRMP process, FRAs must prioritise and distribute their resources so as to fulfil their statutory duties according to the local need. Under the FRS Bill, those duties are to promote fire safety, fight fires and protect life and property in the event of fires; rescue and protect people in the event of road traffic accidents (RTAs); and to respond to other emergencies set out by Order, which pose a serious risk to individuals and the environment. Their discretionary powers give them considerable scope to take account of social and economic concerns.
9	Utilisation of resources	FRAs should consult insurers where a reduced response is planned.	Under the guidance on IRMPs FRAs are expected to consult a wide range of stakeholders on their plans, including businesses who have a legitimate interest in proposed changes in standards. Insurers fall within this category, and we would expect them to be consulted.
10	Utilisation of resources	Fully support FRAs exploring co-first responder schemes. Indications are that schemes have saved lives.	Government welcomes this support and agrees that evidence suggests these schemes can save lives.
11	Utilisation of resources	Failures by FRAs to participate in co-responder	The National Framework sets out the Government's

		schemes are an example of community safety progress being blocked by dogma.	expectation that FRAs should explore the benefits of implementing such schemes and the provisions in the FRS Bill would enable them to participate in such schemes if they wished to.
12	Mutual Assistance (Para 3.15 - 3.18)	How should shared services be funded and with what cost recovery arrangements between FRAs? Should mutual assistance payments be abolished?	Mutual assistance schemes are important for the effective operation of the FRS, and would be crucial in ensuring an effective response in the event of a major emergency. Apportioning expenses between FRAs ensures that they do not suffer financially by participating in such schemes. However, any participating FRA can request that the Secretary of State intervene to resolve any difficulties over the issue of payment.
13	Fire Investigation	Only suitable for larger FRAs to consider fire investigation.	The difficulties for smaller FRAs are recognised in the National Framework, which suggests RMBs should develop a regional capability.
14	Fire Investigation	Government should take greater lead. Is the new protocol on schedule?	Government is providing major support, especially through the Arson Control Forum. In the NorthEast a joint scheme between the FRS and police service in the region is being piloted. The new protocol is well advanced but is now estimated for delivery in the late summer.
15	Fire Investigation	Shortage of police staff hinders effective fire investigation.	This is not a comment that has been repeated nationally. Although there will be circumstances of competing demand, police services generally have been fully involved and supportive. The deployment of police officers is the responsibility of the chief constable for the area.
16	Contingency planning	The armed forces will have role in meeting any terrorist	The arrangements for military support to the civil community

		threat. What are the implications for cover?	are a matter which the Government keeps under continuous review.
17	Quality assurance and best practice (Para 3.29 - 3.31)	What is the role of HMFSI? Concern that there will be no independent assessment of operational effectiveness.	<p>HMFSI has initiated a process of ongoing liaison with each FRA with a senior member of HMFSI appointed to undertake this task on a regional basis. This will encompass operational management. Any relevant information from this process will also be shared with the Audit Commission as further background to inform CPA implementation.</p> <p>HMFSI will work with stakeholders to review all existing guidance relating to operational, technical and professional matters and disseminate good practice.</p>

Chapter 4 - Resilience and New Dimension

	Paragraph	Comment	Response
1	Resilience (Para 4.1 - 4.2)	A narrow view of resilience is offered in the draft National Framework.	Chapter 4 has been expanded in the revised 2004/05 National Framework.
2	Resilience	Investment from Government is welcome. Will there be clarification in the Framework about continuing financial support?	The National Framework provides as much information about the scope of financial support as possible.
3	Resilience	It is important to establish a clear role and accountability between the existing New Dimension programme and RMBs.	The Government is committed to a regional approach where appropriate. Both New Dimension (ND) and RMBs are organised along regional lines. ND regional team members collaborate with Regional Fire Management Board appointed Resilience-leads over specific project workstreams, such as decisions on where to deploy ND equipment.
4	Resilience	Tension between local and regional/national priorities. IRMP process could lead to situation where regional Chemical, Biological, Radiological and Nuclear (CBRN) capabilities are compromised.	As the Government is providing the equipment and training to deal with CBRN incidents through the ND programme, there should be no possibility of regional CBRN capabilities being compromised by the IRMP process. Furthermore, the ND risk assessment process for the location of appliances and equipment is carried out on a national basis. This has been informed by contributions from ND regional planners who offer a local perspective in the assessment process.
5	Resilience	The Fire and Rescue Services Bill will extend the Service's responsibilities.	Subject to parliamentary approval, the Fire and Rescue Services Bill will

		What additional financial support will be available?	provide the Secretary of State with the power to extend duties to Fire and Rescue Authorities to deal with emergencies other than fire or road traffic accidents. The proposed new duties will be set out in an Order and will seek to place on a statutory basis those emergencies to which authorities respond at present, but for which they have no statutory requirement to plan, train or equip. However, we do recognise that responding to terrorist incidents does present a new challenge to FRAs. That is why we have made £188 million available to fund the New Dimension project. This funding covers training as well as equipment. The Government will provide funds annually from 2005/06 to meet the crewing needs of this investment. At the time of writing, the level of funding and its means of its allocation is currently under discussion between the Government, CFOA and the LGA.
6	New Dimension (Para 4.3 - 4.5)	There is a lack of understanding as to how the New Dimension programme will be rolled out.	To date the ND programme has rolled out the mass decontamination capability to the Fire and Rescue Service. The programme is taking the lessons learned from this phase and is using them to inform the remaining equipment roll out. It is early days and we are keen to involve stakeholders to ensure successful roll out and use of the equipment.
7	New Dimension	How will ongoing training and	Government is committed to

		<p>maintenance costs be met? Training requirements must also be reflected in Formula Spending Share.</p>	<p>fully funding training for ND equipment. Ongoing training needs and methods of financing are being reviewed as part of the longer-term strategy for managing resilience assets.</p>
8	New Dimension	<p>FRAs' MoUs with health authorities for mass decontamination should be expanded to include other agencies, including the Police.</p>	<p>The working arrangements between emergency services are well established and published in the Cabinet Office (CCS) guidance 'Dealing with Disaster'. This was revised in 2003 and a new edition is currently being undertaken.</p>
9	New Dimension	<p>Capital investment required for alterations to premises storing New Dimension equipment.</p>	<p>Government will grant reasonable funding to FRAs that have applied for help with the cost of accommodation changes that result from the location of IRUs at individual fire stations.</p>
10	New Dimension	<p>Where do "regional co-ordinators" fit in?</p>	<p>Each region has a ND representative, called a Regional Planner, to facilitate information and instructions between individual FRAs and the project. All planners lead a team of representatives, called team members, of whom there is at least one per FRS.</p>
11	New Dimension	<p>The New Dimension project's regional team members should be managed directly by ODPM to avoid conflicts of interest.</p>	<p>All regional planners and team members work full-time on the project, directed by the New Dimension project management on a day-to-day basis. In the nature of their profession, all are also serving fire officers, who stand ready to perform their duties in the event of an (ND or other) incident. Consequently, these officers must remain answerable to their Chief Fire Officers rather than ODPM.</p>

12	New Dimension	Government should establish a National Emergency Management Agency to coordinate equipment and personnel (based on the US model).	The Government has concluded that there is no current requirement for an agency. Clear co-ordination arrangements are crucial for successful emergency planning and the Government already has these arrangements in place. The Home Secretary has overall responsibility for safety and security. The Cabinet Office co-ordinates the development of resilience policy and procedures across Government and seeks to identify and prevent potential disruption. There are also regional resilience teams in each of the Government Offices.
13	New Dimension	Personal insurance: indemnity of firefighters attending CBRN incidents.	The Cabinet Office, together with the relevant Government Departments (Home Office, ODPM, Department of Health (DH)) has had discussions with the insurance industry. These have established that most life insurance products do not contain terrorism clauses, and emergency workers are not normally given higher than standard ratings because of their profession, although individuals should check the specific details of their policies. Evidence from the armed services shows that premiums have not been increased as a result of CBRN training.
14	Firelink	Greater consultation and co-ordination of <i>Firelink</i> and regional controls projects is required.	Firelink, FiReControl and New Dimension project teams are working co-operatively to improve the capacity of the Fire and Rescue Service to prepare for and respond to

			<p>catastrophic incidents. A fully complementary approach to the implementation of the projects has been developed, and they are now being managed as a single programme.</p>
15	Firelink	<p>The National Framework should encourage increased use of data transmission.</p>	<p>We agree that there is merit in increased use of data transmission. The project to provide a wide area voice radio communication system (Firelink) will also provide data capacity for status messaging, text and automatic vehicle location system (AVLS). The FiReControl project, which is delivering regional fire and rescue control centres, is looking at the scope to maximise the use of data transmission in providing this service.</p>
16	<p>Statutory responsibilities of Fire and Rescue Authorities (Para 4.9)</p>	<p>When will the statutory duties to respond to New Dimension and non-fire emergencies be enacted?</p>	<p>Whilst not yet statutory duties, FRAs already use ND equipment and respond to non-fire emergencies. We are fully confident that this will continue.</p> <p>The proposed new duties will be set out in an Order and will seek to place on a statutory basis those emergencies to which authorities respond at present, but for which they have no statutory requirement to plan, train or equip. We will consult widely on proposals before making any Order under the Bill.</p>

Chapter 5 - Fire & rescue staff

	Paragraph	Comment	Response
1	General Comment. (Para. 5.1 - 5.7)	Government's commitment to work with all stakeholders to increase and improve opportunities for the whole community to work for FRS is welcome.	The commitment to working with stakeholders to achieve equality of opportunity for all staff is fundamental to the modernisation process and we are pleased that stakeholders welcome this aspect of the Framework.
2	General Comment	Chapter 5 fails to differentiate between, or value sufficiently both uniformed and non-uniformed staff.	Government accepts that the initial paragraphs of chapter 5, whilst stressing the importance of all staff, do not address the inclusion of and contribution from non-uniformed staff sufficiently clearly. This has been tackled in the final version of the 2004/05 Framework to ensure that it reflects the implications of the modernisation agenda for all FRS staff.
3	General Comment	Equal access to training for all firefighters is welcome. However, training for retained staff must be different due to time constraints and mobility. Control room staff: many may leave early leaving gaps that are impossible to fill.	The need to consider such constraints has been recognised in the draft National Framework (paragraph 5.5) This issue is dealt with further in the response to comments on chapter 6.
4	General Comment	The Framework must clarify staff - FRA/RMB relationship in terms of employer responsibility. What is the employer status of RMBs?	RMBs will not have the power to employ staff. However, it is encouraging that most regions have now decided which FRA in the region should lead for each of the six functions listed in the White Paper, and that progress is being made in business planning for these functions.
5	General Comment	With the introduction of a revised pension scheme in 2005 Government must	One of the objectives in designing the new pension scheme is to address the high

		recognise potential costs of likely retirements.	cost of the current arrangements for both employers and employees. In parallel, we are also reviewing the current financial arrangements for funding firefighter pensions.
6	General Comment	Non-uniform staff not referred to in paragraphs 5.4 and 5.7.	These paragraphs are specifically about staff on the retained duty system. The need to make clearer references to the non-uniformed staff has been addressed (see point 2 above).
7	General Comment.	Welcome commitment to work with business community to support retained recruitment, but advocate use of higher profile advertising nationally and greater central support.	The issue of higher profile advertising is being considered by the Retained Review and will be covered in its recommendations to the Practitioners' Forum in July 2004.
8	General Comment	Paragraph 5.3 of the draft National Framework deals with working patterns and overtime. It is not Government's responsibility to negotiate or institute these changes.	Conditions of employment are a matter for employers and employee representatives. However, Government has a legitimate interest in providing value for money to taxpayers. Flexibility of working patterns, driven by an authority's IRMP are key to the efficiency and effectiveness of the Service.
9	Human Resources Management	HR strategy must reflect needs set out in IRMP (5.2) and yet RMBs should draw up regional HR strategy (5.11). How can these two things be rationalised?	The regional HR strategies will need to be compatible with local IRMPs. It is for each RMB to identify efficient and effective ways of providing the HR support and training functions in a way that enables individual FRSs to deliver the policies on staffing etc. in their IRMPs.
10	Human Resources Management	Conflict between local HR issues and RMBs' HR responsibilities.	
11	Human Resources Management	Need to recognise local dimension of HR and the FRA's responsibilities as an employer.	
12	General Comment.	Framework places part-time and overtime working in opposition.	These two provisions do not need to conflict as they deal with different needs. This has been clarified in the revised

			Framework.
13	General Comment.	Support encouragement of more diverse workforce to meet shortfall in retained. Also support flexible shift patterns and part-time working for the same reason.	Government welcomes this support.
14	General Comment.	Use "Fire & Rescue Service Staff" (FRSS) rather than "non-uniformed staff".	"Fire and Rescue Service Staff" is used when referring to all staff, and "non-uniformed staff" is used when referring to a particular group of staff, who are currently distinguished by not wearing uniform.
15	General Comment.	ODPM should clarify how all staff fit with the workstreams in chapter 5; structures to engage them and their representatives in modernisation; implications of IPDS; and, terms and conditions.	Stakeholders have expressed concerns that this chapter does not properly acknowledge or represent the role of FRS staff other than in operational roles. This has been dealt with in revising the chapter. Key stakeholders in the FRS have been and will continue to be involved in the development and implementation of equality and diversity strategies.
16	General Comment.	Greater focus required on recruiting black and ethnic staff. Terms "equality" and "diversity" are not defined, differentiated or consistent.	The programme of peer review on equality issues, which is being directed and supported by the Equality and Diversity Programme Board <i>Diversity Happens!</i> chaired by Sir Graham Meldrum (HMCIFS) will result in a series of actions for Fire and Rescue Authorities which will set out the national performance expectations in this area.
17	Human Resources Management (Para. 5.8 - 5.11)	Regional HR strategy needs a better definition.	It is for RMBs to define their regional HR strategy within the remit set out at paragraph 5.12 of the draft National Framework. .
18	Human Resources Management	Support regional approach to HR, including for occupational health.	Government welcomes this support.
19	Human Resources	There is a need to reflect the	Clause 32 of the Fire and

	Management	regional HR function in any revised NJC framework.	Rescue Services Bill will allow Government to set out formally all the factors it wants the negotiating body to take into account when trying to reach agreement.
20	Human Resources Management	A more professional approach to HR is necessary and can only be achieved effectively on a regional basis.	Welcome this support for proposals to review HR function and encourage greater professionalism. Agree that HR function is one which can effectively be organised at regional level.
21	Human Resources Management	Need to acknowledge that some HR elements already enjoy support and integration into wider County Council HR strategy and practice, and associated economies.	The different organisational make up of the various FRAs will need to be taken into account when developing the functions of each RMB.
22	Human Resources Management	The link between HR strategy and needs of IRMPs is welcome (especially flexible shift patterns and working practices).	Government agrees that it is important to link the service delivery provision of the organisation with the resource planning.
23	Human Resources Management	An HR strategy based on core values must be implemented.	The Core Values will be an element of a successful HR strategy and culture change for the FRS. We have recognised this by including the draft Core Values as an annex to the National Framework.
24	Human Resources Management	FRAs are awaiting guidance from ODPM on staffing and recruitment issues.	A tool kit on recruitment issues has been developed and will be launched in September 2004. Government has recently released new centrally produced career and recruitment literature.
25	Human Resources Management	ODPM is due to issue advice on the Working Time Directive.	HMFSI undertook to revise earlier NJC guidance on the Working Time Directive in the light of an HSE investigation, which revealed non-compliance with the Directive. Final central guidance on Working Time Regulations was issued on 8 th April 2004
26	Improving	Welcome review of targets	This issue is being considered

	Opportunities (Para. 5.12 - 5.16)	for ethnic minority representation in Service. Concern that they remain unachievable.	by Equality and Diversity Programme Board ("Diversity Happens!") responsible for FRS Strategy on equality and diversity issues.
27	Improving Opportunities	Require guidance on exemption to Disability Discrimination Act (DDA).	Guidance on medical issues is being issued in September 2004 to help FRS understand their obligations under DDA. A national seminar will also be held in September.
28	Improving Opportunities	More flexible working practices will not of themselves increase female representation, but removal of single entry system will encourage applications from women.	Single entry system removed with repeal and replacement of Appointments and Promotion Regulations on 25 th March 2004.
29	Improving Opportunities	FRAs and RMBs should be more proactive in acting on equalities strategies.	Government has appointed Jagtar Singh, Deputy Chief Fire Officer, Bedfordshire FRS, as equalities advisor to promulgate good practice and work with FRSs and RMBs to develop equalities strategies. The "Diversity Happens!" programme will also be pursuing specific initiatives which will support them in their work.
30	Improving Opportunities	Framework needs to address issues of discrimination on an organisational level i.e. to ensure practices and procedures (e.g. discipline) do not disproportionately affect any specific groups.	Issues of discrimination both by individuals and on an organisational level will be tackled by "Diversity Happens!", the initiative being run by the ODPM Equalities Programme Board.
31	Improving Opportunities	Paragraph 5.12 of the National Framework should contain a strong commitment to diversity.	The Government's commitment to diversity in the Fire and Rescue Service is set out in the National Framework and will be reflected by the actions arising from the Equality and Diversity Programme Board <i>Diversity Happens!</i> chaired by Sir Graham Meldrum (HMCIFS) which will set out the national performance expectations in

			this area.
32	Improving Opportunities	Guidance on redeployment of staff is required.	This is an issue for individual employers but general guidance on the principles of redeployment on health grounds is available through both ODPM and other bodies (e.g. The Advisory, Conciliation and Arbitration Service (ACAS))
33	Appointments and promotion (Para. 5.17 - 5.18)	Potential conflict between reduced numbers in the Service and multi-tier entry.	Multi-level entry provides greater opportunity for staff with appropriate skills both from within and outside the FRS. Recruitment needs will fluctuate over time. The ability to bring people in at different levels in the organisation gives greater opportunity for those with the right skills and potential, and brings a wider pool of expertise to all levels of the organisation.
34	Appointments and promotion	Further guidance from ODPM on Integrated Personal Development System (IPDS) with regards to retained would be welcomed.	Chapter 6 provides more information on IPDS; however, guidance on IPDS in general is as applicable to the staff on the retained duty system as to wholtime staff. ODPM will encourage and facilitate the sharing of good practice on this issue between the FRS and RMBs. The provision of more modular development courses and e-learning material by the FSC will be particularly helpful to staff on the retained duty system.
35	Discipline (Para. 5.21 - 5.23)	Approval for replacement of procedures with ACAS principles. Must be delivered on time.	The Fire Services (Discipline) Regulations 1985 would be abolished on enactment of the Fire and Rescue Services Bill. Once the regulations have been abolished, fire and rescue services will be expected to implement disciplinary procedures which are based on Advisory, Conciliation and Arbitration

			Service (ACAS) best practice guidance.
36	Sickness management / ill health retirement (Para. 5.24 - 5.28)	Despite the proposed changes to the firefighters' pension scheme, scope for redeployment is limited. A number of issues, e.g. employment law / equal pay legislation apart from the pension scheme, make it difficult. Further guidance required.	Noted. However the proposed amendments to the pension scheme will increase the flexibility of FRAs to redeploy, and this should be welcomed. FRAs themselves are in the best position to identify whether there are suitable alternative posts for firefighters. This is not a matter for central guidance.
37	Sickness management / ill health retirement	The proposed amendments to the pension scheme to allow use of skills of personnel no longer fit enough to undertake the full range of operational duties is welcomed.	The Government welcomes this support.
38	Sickness management / ill health retirement	The Framework should set out individuals' responsibilities to maintain fitness, and make clear that it is not the responsibility of the employer to provide fitness training equipment or time for fitness training to help them do so.	The National Framework relates to FRAs' responsibilities, not to those of employees.
39	Sickness management / ill health retirement	Occupational health arrangements should be linked to the overall health and safety arrangements and include a wider role for proactive involvement in workplace health-related issues.	This is an issue for FRAs as employers. The government's expectations of FRAs regarding occupational health are set out in the National Framework.
40	Pensions (Para. 5.29)	Government urged to take early action on reviewing pension arrangements.	We are planning to issue a consultation document on proposals for a new pension scheme later this year. The aim will be for any new scheme to be operational from April 2006.
41	Pensions	More flexibility, remove "golden handcuffs".	In designing the new pension arrangements we will be aiming to remove any perverse incentives which either encourage premature

			departure at a cost to an FRA or require staff to remain in post without further benefit once a full pension has been accrued. We are looking also at ways of allowing for early exits.
42	Pensions	Will system of Medical Appeals Boards change when the pension scheme is amended? Whilst the system continues to allow different levels of appeal against individual Fire Authority decisions, high levels of sickness absence will be maintained.	Amendments to the Firefighters' Pension Scheme will enable Fire and Rescue Authorities to continue to draw on the experience of trained firefighters who may no longer be fit to undertake firefighting duties, rather than have to retire them with an ill-health pension. They will also place an obligation on Fire and Rescue Authorities to use independent medical assessment - whose opinion will be binding - before approving applications for early retirement on ill-health grounds.
43	Pensions	Further changes to pensions are needed to facilitate interchange of personnel at senior management positions and between different departments of County Councils.	We will consider as part of the review of the pension arrangements. However, at this stage we would expect personnel moving into senior management positions in the FRS, without operational duties, to remain members of the Local Government Pension Scheme (LGPS). Similarly if members of the Firefighter's Pension scheme (FPS), or any new firefighters' scheme, transfer to other local government duties other than on secondment, we would expect them to defer their FRS pension and join the LGPS.
44	Pensions	If the new pension scheme affects existing scheme members there may be difficulties in retaining existing staff.	In designing the new pension scheme and its relationship with the FPS, account will be taken of the need to ensure that the overall remuneration

			package is appropriate to recruit and retain staff in the modern FRS.
45	Pensions	If new staff decide to opt out of the new pension scheme, this could make it more difficult to fund the scheme.	We are considering new arrangements for financing both the existing and new pension schemes to ensure provision is made for future pension liabilities.
46	Pensions	Government should fund the scheme centrally.	Paragraph 7.9 of the 2004/05 National Framework clearly explains the Government's position regarding financing the scheme.

Chapter 6 - Workforce development

	Paragraph	Comment	Response
1	IPDS (Para. 6.1 - 6.6)	Support IPDS, which, for example, will ensure retained staff have the necessary skills to do their jobs.	Many respondents supported the introduction of the IPDS, recognising the wide benefits it is bringing the FRS. We welcome the positive responses on this.
2	IPDS	Welcome IPDS for learning and development of staff (equality of opportunity).	
3	IPDS	IPDS will undoubtedly bring about an improvement in standards.	
4	IPDS	The draft National Framework made no mention of non-uniform staff.	Government values the major contribution made by non-uniformed staff and their unions in the modernisation process. It acknowledges that more could have been said in the draft Framework about the role played by non-uniformed staff. Government's position remains as stated in the White Paper: IPDS principles apply to all FRS staff and we are pleased to note that work on developing role maps for non-operational staff has begun.
5	IPDS	Many FRAs supported the application of IPDS to retained personnel and the staff concerned also appear to welcome the new system. However, some concern was expressed about practical issues, such as the time required to develop retained staff to the same level as whole-time staff.	Some FRAs expressed concerns about the application of IPDS to staff on the retained duty system - although we are pleased to note that Retained Firefighter's Union (RFU) research indicates that the majority of staff on the retained duty system are keen to be involved in IPDS. FRAs will be aware that the 2003 pay agreement for operational staff applies the IPDS system to both whole-time and staff on the retained duty system, and ODPM supports this principle. Staff on the retained duty system need to be developed to fulfil their roles in the same

			<p>way as wholetime staff.</p> <p>However, we acknowledge that there are particular considerations for staff on the retained duty system and there are a number of work-streams under way to help tackle these:</p> <p>(a)The Retained Review which will make its recommendations to the Practitioners' Forum in July 2004., is looking broadly at issues concerning staff on the retained duty system including their recruitment and development. The review will look at ways of delivering the development opportunities needed in ways that will suit the requirements of the individual.</p> <p>(b) Development and training is becoming available in increasingly flexible ways. For example IPDS lends itself to more modular delivery than the former training system and the FSC has redesigned many of its development programmes to reflect this. In partnership with the Scottish College, the Fire Service College has also been developing a range of e-learning modules which will offer greater flexibility for all staff including the those on the retained duty system.</p> <p>(c) As IPDS develops further we would expect staff on the retained duty system - many of whom bring a variety of skills to their FRS roles - to benefit from Accreditation of Prior Learning and Prior Experiential Learning arrangements.</p>
6	IPDS	Concerns about lack of information concerning costs	A number of FRAs expressed concern about the resource

		of implementing IPDS, in particular in rural brigades with high staff turnover.	<p>implications of IPDS with a smaller number saying they felt well placed to take IPDS forward. One or two FRAs questioned the value of the system itself. IPDS is, of course, a key part of FRS modernisation and its implementation is an essential part of the 2003 Pay Agreement. ODPM believes that IPDS reflects good practice in staff and organisational development which the former system for training staff no longer did.</p> <p>FRAs will be able to implement IPDS most cost-effectively if they make full use of the ODPM funded IPDS Hub, which now includes 3 regional implementation support teams. The IPDS teams will be able to advise FRAs on good practice and help them to avoid duplication of effort. FRAs will also need to ensure that collaborative working, including on a regional basis, is maximised improve efficiency and effectiveness. The National Workforce Development Strategy will provide the framework for deciding which training is carried out at local, regional and national level. It will also make clear what sorts of training can be provided by non-FRS providers' such as local Further Education Colleges, and underline the flexibilities offered by outreach training and e-learning.</p>
7	IPDS	Require further resources to implement IPDS.	
8	IPDS	IPDS is costly, process-driven, untried and unlikely to meet needs of FRAs.	
9	IPDS	Certain FRAs feel they are already well advanced in implementation of IPDS.	
10	IPDS	Support move to IPDS but must ensure it does not become too prescriptive and so disable local flexibility.	Comments on IPDS showed, on the one hand, a wish to avoid it becoming overly prescriptive, whilst on the other a desire for greater central

11	IPDS	IPDS may benefit from greater central determination.	determination. We would encourage all stakeholders to keep in close touch with relevant representatives on the IPDS Project Board and with the IPDS Hub to help ensure that the right balance is struck.
12	IPDS	Central guidance is often delayed. Awaiting ODPM guidance on a number of issues (e.g. assessment centres).	<p>The development of IPDS has taken a number of years, and the pace of development has accelerated rapidly in recent months. Guidance has sometimes been delayed for a number of reasons, not least the need to ensure full consultation with employee representatives. However, detailed guidance on four key aspects of the system has been issued in the last year: workplace assessment, personal development records, development activities and development reviews. The FRS Modernisation Programme arrangements which now apply to IPDS have been set up to ensure the further roll-out of the project runs smoothly.</p> <p>The best advice for FRAs is to work closely with the relevant regional IPDS support team. Support teams will be able to tell FRAs the latest position on any aspect of IPDS and will sometimes be able to provide information in advance of formal guidance being issued. For example, in some cases where FRAs have had a pressing need to see particular guidance, draft material has been made available to them.</p>
13	IPDS	Supportive of IPDS but concerned about slippage due to negotiations between FBU and employers.	The IPDS project is largely on target. However, we are keen to retain the support of all stakeholders and this (and other factors) can sometimes

			impact on timescales (See point 15).
14	IPDS	Uncertainties created by IPDS have caused a fall in number of those applying for promotion.	IPDS marks a major change for the FRS and we understand that it does create uncertainties for staff. However, the Appointment and Promotion Regulations have now been amended and ODPM has communicated the changes to FRAs. FRAs may find that they are now able to issue information to staff about the arrangements, which will apply locally.
15	Workforce Development Strategy (Para. 6.7 - 6.13)	Agree staff must be supported and developed but await further advice on interchange and recruitment.	Guidance and a toolkit on recruitment will be launched in September 2004, but we are not proposing to issue any further guidance on interchange.
16	Workforce Development Strategy	Workforce development will require innovation, including from outside the FRS community.	Pleased to see a number of respondents share Government's view that the FRS will benefit from drawing from a range of sources, including those outside the sector, in developing its workforce.
17	Fire Service College (Para. 6.14 - 6.21)	College will need continued support from Government, including capital investment.	We have invested in the FSC to address the most pressing shortcomings in its training facilities and student accommodation. We are also working with the College to explore options for partnership with the private sector.
18	Fire Service College	More information required of the future structure, role and value of the College / Centre of Excellence.	Further information on this subject can be found in chapter six of the 2004/05 National Framework.
19	Fire Service College	FSC must recognise its role as a provider of Service's needs including CFS. Must be cost effective and focused cannot be allowed to have a monopoly.	We are investing in the FSC as a Centre of Excellence so that it can meet the expectations of the UK FRS, building on its strengths to deliver training where it is the most efficient and effective provider. Its training portfolio will continue to

			<p>evolve to meet the changing needs of the FRS within the context of the National Workforce Development Strategy. We recognise that the FSC operates in a competitive market, and it will need to demonstrate that it is offering high quality, cost-effective training.</p>
20	Fire Service College	<p>Robust mechanisms required to feedback on quality, efficiency and effectiveness of services College provides. Welcome the Practitioners' Forum's role in this respect.</p>	<p>The Practitioners' Forum will provide the User Group and an opportunity for major stakeholders to feedback on the College's performance and contribute to its strategic development.</p>
21	Fire Service College	<p>Support vision of Centre of Excellence, but believe this does not require physical relocation of other partnership training bodies.</p>	<p>We welcome partnerships between FRS institutions, the wider UK fire community and the College where there are synergies that can contribute to the Centre of Excellence. Decisions on whether this requires physical co-location are a matter for the bodies concerned.</p>
22	Fire Service College	<p>IPDS will require partnership with education stakeholders and the development of e-learning. This will have an impact on the role of the College.</p>	<p>The FSC has links with a number of education stakeholders and is seeking accreditation as a Centre of Vocational Excellence. It is also developing a major e-learning project to support and enhance its role within IPDS.</p>
23	Fire Service College	<p>Hope the College will be more open to needs of retained in future.</p>	<p>The FSC recognises the training and development needs of personnel on the retained duty system. It is working on a major e-learning project which will support IPDS roll-out to staff on the retained duty system, together with the development of modular and other distance learning training options.</p>
24	Fire Service College	<p>Question need for College to be involved in accreditation, verification and licensing of</p>	<p>It is important for a consistent standard to be maintained across IPDS. The provision of</p>

		modules. Regional training centres will be able to perform tasks at Para 6.19.	quality assurance in the delivery of IPDS in England, including accreditation and securing the training of trainers to national occupational standards, is a function we propose should be led by the FSC.
25	Fire Service College	Will the Framework prevent the use of the College for recruit training?	No.
26	Leadership (Para. 6.22 - 6.213)	Refer to wider Government managerial programmes that are available.	We will be working with CFOA to develop a new leadership framework for the FRS. This will need to be cross-referenced to existing provision both within government and in higher education where competencies are transferable.
27	Leadership	Need clarity on identifying "future leaders".	The systems for identifying and developing future leaders are key to the future leadership of the FRS. IPDS Project Board is developing systems to improve the present arrangements. ODPM is looking at the framework for developing future leaders of the Service and at what should succeed the Brigade Command Course.
28	Leadership	Government should support a programme of secondments.	We will be working with CFOA to develop a new leadership framework for the FRS, and HMFSI are looking into targeted development. Secondments may well have an important part to play in both.

Chapter 7 - Finance

	Paragraph	Comment	Response
1	General comment	This chapter is a summary, rather than a set of proposals.	One of the draft National Framework's objectives was to explain what the Government will do to support FRAs. Chapter 7 does just this by setting out what funding the Government has and will provide FRAs. Another of the Framework's objectives is to provide clarity about the outcomes and objectives the Government wants to be achieved. Chapter 7 also does this by, for instance, outlining the Government's expectations on Council Tax, transitional funding and efficiencies.
2	General comment	Where is the initial investment evident in other public sector modernisation programmes? It is unrealistic to expect modernisation on existing grant provision.	<p>In 2004/05, authorities received an average increase of 4.2% and no authority received less than a 3.5% increase. Nonetheless, the Government recognises that there may be a lag between costs and savings of modernisation. An additional £30m transitional funding is available for England and Wales, which will be released subject to satisfactory progress on ongoing pay negotiations and modernisation.</p> <p>The Independent Review of the Fire Service said "We are confident that, within the foreseeable future, benefits will more than exceed additional costs, including those of the pay increases we propose". FRAs should fully utilise the opportunities for efficiency improvements, including through collaboration, consistent with their duties under Best Value and the</p>

3	General comment	The focus on short-term costs and savings is likely to affect adversely the ability to deliver long-term improvements. Sustainable modernisation is needed.	Government's objectives to reduce accidental deaths from fire in the home and deliberate fires.
4	Revenue Support	Cost benefit of reform identified in Bain is not translated into Framework	
5	Revenue Support	Costs and savings will not balance over SR2002 period.	
6	General comment	There are concerns about FRAs gaining precepting powers and the need to build up reserves.	Many Combined Fire Authorities pointed out that they would have to raise reserves for the first time in 2004/05.
7	General comment	Proposals on key finance issues - e.g. RSG and pensions - would be the biggest contribution Government could make towards Framework, but they are mentioned only in passing. No firm timetable set out in Framework.	<p>The Government has asked a working group of officials, including the LGA and representatives from FRAs, to examine the case for change and possible alternatives to the existing Fire Formula Spending Share (FFS) that might better reflect FRAs' 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 2005/06 at the earliest.</p> <p>The Government is committed to reviewing pension arrangements for all firefighters. Work is under way on the development of new pension scheme which will reflect: the changes in the nature of fire fighting duties under modernisation proposals; the changes in the regulatory and tax framework for pensions generally; and equality and diversity issues. We propose to issue proposals for consultation in 2004 and envisage any new pension scheme being operational from 2006. The</p>

8	General comment	Concern that FRAs who modernised before the White Paper will be penalised due to their inability to make savings in the future.	Government is also reviewing the financial arrangements for funding firefighters' pensions.
9	Revenue Support	Welcome proposed review of distribution of funding.	
10	Revenue Support	New grant distribution system should reflect new duties in the FRS Bill and increasing demand.	
11	Revenue Support	Need for redistribution of funds from urban to rural areas.	
12	Revenue Support	Need a single funding model. FSS should take account of all spending needs. Remove any element of competition or ring-fencing.	
13	Distribution	SS does not identify loss of economies of scale in maintaining retained stations.	
14	Distribution	Additional costs of providing fire services in rural areas were offset by cost of retained. Pay parity will change this.	
15	General Comment	Suggest penalties for wasteful practices.	This issue is addressed at paragraph 8.11 of the 2004/05 National Framework.
16	Revenue Support	Welcome Government's promises of revenue support for modernisation.	The Government recognises that there may be a lag between costs and savings of modernisation. An additional £30m transitional funding is available for England and Wales, which will be released subject to satisfactory progress on ongoing pay negotiations and modernisation.
17	Revenue Support	Repayment of transitional funding should be linked to review of distribution.	Any changes to the distribution formula would come into effect for 2005/06 at the earliest. The only option identified thus far for recouping this money is to reduce the 2005/06 local government finance settlement for authorities with responsibility for fire and rescue services. This would inevitably give rise to at least some difference

			between the amount of transitional funding that FRAs receive and the amount later deducted. The Government is willing to consider any alternative mechanisms that can be identified.
18	Revenue Support	LG finance settlement fails to acknowledge the annual 6% increase in fire budgets resulting from pay awards and pensions costs.	Pay is the responsibility of the employers and employee representatives. The Government's position remains that any pay award above existing provision must be funded by modernisation. It would not be appropriate for the Government simply to reflect decisions made by the local government employers in the level of grant. The Government is committed to reviewing pension arrangements for all firefighters. Work is under way on the development of new pension scheme which will reflect: the changes in the nature of fire fighting duties under modernisation proposals; the changes in the regulatory and tax framework for pensions generally; and equality and diversity issues. We propose to issue proposals for consultation in 2004 and envisage any new pension scheme being operational from 2006. The Government is also reviewing the financial arrangements for funding firefighters' pensions.
19	Distribution	Effect of national salary levels on local budgets must be considered.	
20	Revenue Support	There is a significant shortfall in the 2004/05 budget, despite transitional funding.	In 2004/05, FRAs received an average increase of 4.2% and no FRA received less than a 3.5% increase.
21	Supported capital expenditure (Para. 7.9)	Supported capital expenditure should be based on assets not population.	The Government has noted this comment.
22	Combined FRAs (Para.7.10 - 7.11)	Welcome precepting powers.	This change will provide combined FRAs with more

			robust financial arrangements which are self-standing. The change will also improve local accountability, making it clear to local council tax payers what the costs are for providing fire and rescue services, by having this item shown separately on council tax bills.
23	PFI (Para. 7.12-7.14)	There are concerns about the value for money of Private Finance Initiatives (PFI) schemes.	Each PFI project is required to demonstrate value for money before it receives endorsement from the inter-departmental Project Review Group which approves all such schemes. In addition, a recent independent review of FRS PFI projects shows that there are additional benefits from the use of the PFI process in terms of projects being delivered on time and higher quality assets being provided than would otherwise be the case.
24	PFI	PFI is a more costly, less efficient, workforce damaging method of providing fire services.	In a number of cases projects have freed up firefighters' time enabling them to concentrate on their core functions.
25	PFI	Costly for schemes under £20m.	Procurement for PFI projects vary from project to project. However, a number of signed contracts which were under £20m show that the resource costs have not been prohibitive. ODPM is also working to bring these costs down further.
26	Other sources of funding (Para. 7.15-7.17)	Framework should provide maximum flexibility for charging within framework of "reasonableness", including making a profit in certain circumstances, while maintaining free at point of delivery.	The FRS Bill will ensure that FRAs are able to continue to levy a charge for particular services. FRAs can already charge for services other than fighting fires under the 1947 Act with the exception of fires at sea where the FRS Bill re-enacts s2 of the Marine Safety Act 2003. 63% of FRAs already charge for clearing up after chemical or other spills; 55% charge for

27	Other sources of funding	Recommendation: FRAs should be allowed to recover costs for preparation, review, revision and testing of COMAH (Control of Major Accident Hazards) plans.	clearing up domestic or commercial flooding. The current power to charge is discretionary so practice has differed between FRAs. We will establish a clear and consistent basis for charging in the first set of regulations. This will ensure that authorities can continue to charge for services that attract charges currently. A full public consultation on the charging regulations concluded on 7th May 2004. We also propose to allow trading in some activities as part of the freedoms and flexibilities package that flows from Fire CPA in 2005. We expect that these will be non-core activities for which an authority will have been authorised to charge.
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Chapter 8 - Effective performance management

	Paragraph	Comment	Response
1	Effective Performance Management (Para. 8.1-8.5)	Welcome introduction of CPA, including assessment of intervention and prevention, and freedoms and flexibilities.	Government welcomes the recognition of the key role of CPA in supporting improvement and modernisation.
2	Effective Performance Management	Welcome Fire CPA, which must help improve FRAs' performance. Must <u>not</u> duplicate Local Government CPA.	Fire CPA will use learning from the LG CPA model to produce a bespoke framework to support the modernisation of the FRS.
3	Effective Performance Management	Would welcome early explanation of CPA.	The Audit Commission has recently concluded a consultation exercise, which set out their proposals for Fire CPA following the first round of piloting.
4	Effective Performance Management	What are implications for a county FRA?	The FRA's Fire CPA outcome will form a service sector component of the overall CPA judgement for relevant county councils to be undertaken in 2005/06.
5	Effective Performance Management	Need to reflect the different types of FRA.	The framework the Audit Commission consulted on is based around a corporate assessment and is sufficiently flexible to accommodate FRAs of different sizes and organisational structures.
6	Effective Performance Management	Concern about role of Audit Commission and introduction of a system used to assess LAs. How will IRMPs be tested? Could inspection undermine IRMPs?	Fire CPA will use learning from the LG CPA model to produce a bespoke framework to support the modernisation of the FRS. IRMPs will be assessed as a component part of CPA. As with other aspects of performance this will seek to help identify improvement priorities and to capture good practice.
7	Effective Performance Management	CPA will require additional resources.	A CPA model is being developed which is as flexible and proportionate as possible. Its outcomes are intended to provide an important resource to support each FRA in taking forward improvement and

			modernisation.
8	Effective Performance Management	What is future role of HMFSI?	HMFSI will work with stakeholders to review all existing guidance relating to operational, technical and professional matters and disseminate good practice. Also, HMFSI has initiated a process of ongoing liaison with each FRA with a senior member of HMFSI appointed to undertake this task on a regional basis. This will encompass operational management. Any relevant information from this process will also be shared with the Audit Commission as further background to inform CPA implementation.
9	Effective Performance Management	Government should set a broader and more challenging range of targets.	The draft National Framework provides clear guidance and direction for FRAs. It sets out national expectations, reflecting relevant Public Service Agreement (PSA) targets, and indicates what functions should be carried out at what level. But, in the majority, it does not prescribe how these functions should be delivered. Instead, it provides a foundation for FRAs to build local, and, where appropriate, regional solutions.
10	Effective Performance Management	The Framework should make links with other Government PSAs and targets.	The Framework, and the new powers to support delivery of CFS in the FRS Bill, recognise the importance of partnership working in addressing community safety issues effectively and the important role the FRS has to play in supporting broader public service objectives under this heading. We will look for opportunities for further integration of the performance expectations and assessment processes for fire and rescue services with broader public service performance regimes based on shared priorities and the overall impact of services on communities.
11	Piloting and timeframe (Para. 8.6 - 8.10)	Fire CPA for County FRAs should be carried out to same timescales	Fire CPA outcomes will form a service sector component of the overall CPA for a county to be

		as CPA for county councils.	undertaken in 2005/06.
12	Improvement planning and capacity building (Para. 8.11-8.14)	Audit Commission should spread good practice from individual brigades.	The Audit Commission and ODPM including HMFSI have recently concluded an MoU which, among other matters, makes provision for joint work on identifying and promoting good practice.
13	Poor performance (Para. 8.15-8.16)	Can only measure poor performance if mechanisms are robust.	The development of the assessment framework incorporates two rounds of piloting and extensive consultation in order to ensure it will be robust.
14	Freedoms and flexibilities (Para. 8.17)	Good in principle, but few detailed proposals available. Too many sanctions/sticks, too few rewards/carrots.	We have been discussing with stakeholders and propose to consult on freedoms and flexibilities in late summer.
15	Best Value and data collection (Pra. 8.18-8.23)	Introduce a new BVPI on attending Road Traffic Accidents (RTAs).	ODPM has established the Performance Indicators Working Group (PIWG), whose membership includes practitioners and representatives of stakeholder groups, to develop a suite of BVPIs that will reflect the full range of responsibilities of the FRS. A separate consultation exercise, currently being undertaken following a review of all corporate health BVPIs for local government as a whole, will address BVPI issues on employment and staffing.
16	Best Value and data collection	Need to develop BVPIs that mitigate risk to the community from non-fire emergencies.	
17	Best Value and data collection	Enforcement should be measured by a new BVPI	
18	Best Value and data collection	Should have new BVPIs on vehicle fires, uniformed women staff (as for ethnic minority Ffirefighters); and on shortfall of retained numbers.	
19	Best Value and data collection	Need to ensure effective risk management succeeds the certification system.	Under the RRO, responsibility for fire safety in non-domestic premises will rest with the person responsible for those premises who must assess risks, remove or reduce them where possible and provide such fire protection measures as are reasonable and necessary in the circumstances. FRAs will inspect these premises and if necessary enforce fire safety requirements. The PIWG are considering whether BVPIs can contribute to measuring FRA performance in this area.

20	Best Value and data collection	Widen deliberate fires BVPI to include both primary and secondary fires.	PIWG is considering whether BV206 should be expanded to cover both primary and secondary fires, and whether to report separately on vehicle fires.
21	Local PSAs (Para.8.24-8.25)	Welcome FRA input into Local Public Service Agreements (LPSAs).	The White Paper and National Framework stress the importance of partnership working in delivering effective CFS services and participation in LPSAs is an effective means to support this.
22	E-Government (Para. 8.26-8.29)	Information Communication Technology (ICT) should be given greater emphasis.	ODPM recognises the importance of ICT as a key element of future service delivery and is funding the e-Fire National Project and other e-government initiatives. ODPM is defining priority e-government outcomes for FRAs, similar in nature to those recently published for local authorities.
23	E-Government	Welcome availability of information on-line.	The on-line services to be delivered by the e-Fire National Project are described on the Local e-Government web-site (http://www.localgov.gov.uk/).
24	E-Government	Uncertainty on funding means that government targets will not be met.	The national requirement to e-enable 100% of services by December 2005 remains in force. Any future e-government funding for FRAs will be linked to delivery of priority outcomes currently being defined by ODPM, to be supported by the e-Fire National Project and other e-government initiatives.
25	E-Government	Government's e-target looks unrealistic and should be delayed.	
26	E-Government	What role for RMBs?	RMBs have no direct responsibility for e-government. FRAs may choose to pool their resources to work towards the e-government priority outcomes on a regional basis, but accountability for delivery will remain with constituent FRAs.

Chapter 9 - Research

	Paragraph	Comment	Response
1	Research (Para.9.1-9.3)	Welcome commitment, focus and additional investment. Must avoid duplication and encourage collaboration. The Practitioners' Forum will play a role in identifying future research requirements.	ODPM fire research is commissioned through two routes (a) by successfully proposing projects for adoption within the Fire Research Programme sponsored by ODPM or (b) by ODPM programme managers in support of their programmes. Governance arrangements will seek to avoid duplication of effort. The governance arrangements will include representation of the Practitioners' Forum and Business and Community Safety Forum.
2	Research	CFS initiatives should be subject to research and analysis.	Agreed. CFS is one of the proposed areas of strategic research.
3	National Fire & Rescue Research Strategy (Para. 9.4-9.10)	How does the FRS bid for funding?	The FRS will be able to make proposals at any time for projects to be included in the FRSD Fire Research Programme. Proposals will be reviewed routinely when the annual Fire Research programme is being prepared and at the mid-year point. Exceptionally, research projects can be adopted at any time, subject to ODPM agreement.
4	National Fire & Rescue Research Strategy	Fire Service College should lead.	A significant amount of fire research is commissioned within ODPM in support of policy. As currently constituted, the FSC is not best positioned or equipped to carry out the role of developing the research strategy.
5	National Fire & Rescue Research Strategy	Must link with social research of universities.	Agreed. Proposals for the development of a Fire Research Academy that will

			embrace both the natural and social sciences (and engineering) are already under informal discussion with academia.
6	National Fire & Rescue Research Strategy	RMBs should perhaps consider research.	ODPM supports the involvement and interest of all stakeholders in fire research matters. However, RMBs should be focused on the six key areas outlined at Paragraph 4.17 of the White Paper and reflected in the National Framework.
7	National Fire & Rescue Research Strategy	Would welcome research on fire trends, equipment, procedures.	Such research is one of the areas of strategic research proposed for the Fire Research Programme for 2004/05.
8	National Fire & Rescue Research Strategy	Is the proposal for one single strategy or strategies (e.g. for CFS and non-fire intervention etc.)	The proposal is for a managed programme of research in a number of strategic areas. However, there will be a "responsive" element within the programme that allows projects to be considered on their own merits, independent of their 'fit' within the strategic research framework.
9	National Fire & Rescue Research Strategy	What is relationship with DTI's Interdepartmental Group on Fire Research (and virtual fire research academy)?	As the "owner" of a significant research programme, ODPM will be a partner in the proposed virtual Fire Research Academy arrangements, alongside other Government and non-Government organisations (including the Interdepartmental Group on Fire Research).
10	National Fire & Rescue Research Strategy	Support development of evidence base for good practice for prevention / CFS.	Support for fire prevention/CFS is covered by one of the areas of strategic research.
11	National Fire & Rescue Research Strategy	Improve communications between sponsors of research.	Agreed. Proposals for the development of a virtual Fire Research Academy will cover this issue.
12	National Fire & Rescue Research Strategy	Must research risk.	Agreed. ODPM has carried out a substantial programme of

			research into the risk from fire to date. This will continue, as necessary, to ensure that advice on good practice and procedures based on risk assessment remain valid.
13	National Fire & Rescue Research Strategy	Strategy must not be overly influenced by larger brigades.	The governance arrangements for setting the strategy and selecting/developing projects will consider their <u>national</u> implications.
14	Statistics (Para.9.11-9.14)	Would like to see wider range of statistics for the work the Service undertakes.	ODPM already collects statistics on all aspects of FRS activity: attending fires, false alarms, road traffic accidents and other non-fire emergencies. However, following a review of the statistics currently collected on primary and secondary fires (which involved FRS personnel), ODPM has decided to collect more detailed information on secondary fires and non-fire emergency incidents in addition to the detailed statistics already collected on primary fires.
15	Statistics	National Statistics System that supports regional controls is next logical step.	All current statistics are collected at brigade level and can be easily aggregated to regional level for analysis. The improved recording of secondary fires and non-fire emergencies will strengthen this existing capability.
16	Statistics	Would like to have a system to police call rates.	ODPM already collects information on the number of calls handled by each brigade. ODPM is considering collecting additional information on malicious false alarm calls - noting the number of calls and the number where a call challenge was successful.
17	Statistics	Fully electronic data collection needs to be linked	This will be an aspect of the proposed new system that will

		in with <i>Firelink</i> .	be investigated during the next phase of the project, which is due to start in July 2004.
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Annex A: List of Acronyms

ACAS	Advisory, Conciliation and Arbitration Service
ACF	Arson Control Forum
AFA	Automatic Fire Alarm
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
CPA	Comprehensive Performance Assessment
DDA	Disability Discrimination Act
DH	Department of Health
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
FRSIT	Fire and Rescue Service Improvement Team
FSC	Fire Service College
FSEC	Fire Service Emergency Cover
FSRD	Fire Statistics and Research Division
FSS	Formula Spending Share
HMFSI	Her Majesty's Fire Service Inspectorate
HO	Home Office
HR	Human Resources
ICT	Information Communication Technology
IPDS	Integrated Personal Development System
IRMP	Integrated Risk Management Plan
IRU	Incident Response Unit
LFEPA	London Fire and Emergency Planning Authority
LGA	Local Government Association
LGPS	Local Government Pension Scheme
LPSA	Local Public Service Agreement
MoU	Memorandum of Understanding
ND	New Dimension
NJC	National Joint Council
NPE	National Procurement Executive
ODPM	Office of the Deputy Prime Minister
PF	Practitioners' Forum
PFI	Private Finance Initiative
PIWG	Performance Indicators Working Group

RFU	Retained Firefighters Union
RMB	Regional Management Board

