



Fire Reform Consultation
Fire Strategy & Reform Unit
Home Office

Sent by email to
firereformconsultation@homeoffice.gov.uk

25 July 2022

Dear Sir/Madam

Reforming Our Fire and Rescue Service—White Paper Consultation

Please find attached the National Fire Chiefs Council (NFCC) response to the open consultation published on 1 May 2022, concerning the Fire White Paper '*Reforming Our Fire and Rescue Service*'.

NFCC is the professional voice of the UK fire and rescue services (FRS) and is comprised of a council of UK Chief Fire Officers, leading the Prevention, Protection, Response, and Resilience services to communities across the UK.

Fire services, firefighters and fire staff enjoy a fantastic reputation in their local communities.

We see this in our Prevention work with older and vulnerable people, alongside the work with young people as we use the brand and positive reputation of the FRS to shape their future fire, road and water safety behaviour and develop their life skills.

We see this in our Protection work ensuring fire safety in the built environment. And we further welcome announcements regarding improvements to fire and building safety which have been outlined alongside the White Paper.

We see this in our emergency 999 response and the local and national incidents that are dealt with efficiently, professionally, and courageously every day.

And we see it in the one-off leadership roles the NFCC and FRS carry out nationally and internationally—such as our response to the global pandemic, the national leadership of the FRS response to the recent UK-wide wildfires, our support to the 2021 wildfires in Greece, or how we have quickly arranged and co-ordinated convoys of surplus appliances and equipment to Ukraine.

The White Paper builds upon the reforms and improvements of recent years, and since the FRS moved into the Home Office. These improvements include the maturing role of the NFCC now firmly captured in the National Framework.

The work of the NFCC in supporting the improvement of FRS is significant and growing. The NFCC has played a central role in the improvement of FRS and the establishment of HMICFRS and the Independent Fire Standards Board. The NFCC work continues and includes products, guidance and support in the following areas, all of which support the intent of the White Paper:

- Fire Standards
- National Resilience
- National Operational Guidance
- National Operational Learning
- Academic Research and Organisational Learning
- Joint Emergency Services Interoperability Principles (JESIP)
- Incident Command
- Community Risk Management Planning
- Protection and Building Safety – New legislation and guidance, Building Safety Regulator, Protection Uplift funding
- Prevention – Person Centred Framework, Digital Safer Home Visits
- Digital, Data and Technology
- People and HR – Recruitment, Talent Management, Equality, Diversity and Inclusion, Coaching and Mentoring, Code of Ethics
- Leadership – Direct Entry, Executive, Middle and Supervisory Leadership programmes
- Grenfell Tower and Manchester Arena Inquiry – Recommendations Implementation
- Commercial and Procurement
- Digital and Physical Implementation support to UK FRS
- National Leadership at times of FRS crisis – COVID response,
- Climate Change events.

Moreover, the function and evolution of the Fire Standards Board and the developing inspection regime through Her Majesty's Inspectorate, all bestow professional weight and direction in the continuous improvement and the vital role of national functions in supporting the FRS.

The NFCC, National Employers (England), and the Local Government Association (LGA) have published *Fit for the Future* (appended) which sets out our collective improvement vision for tomorrow's FRS. Our responses to this consultation should be seen in that context throughout.

Fit for the Future draws upon the available information about service effectiveness and efficiency from service reviews, inspectorate reports and expert commentary. It uses this information to create the shared areas of improvement and an agreed future role for the fire and rescue service.

Well-evidenced business cases for investment will be produced and commended to government in support of our ambitions. These business cases will show how we will save more lives, recognise employee contribution, improve capability and resilience, and continue to deliver excellent value for money.

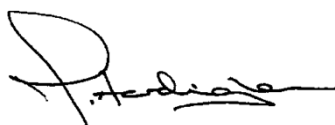
We also note and have considered, the foreword to the White Paper, by the Home Secretary, which states “[now] the government must take action to enable fire and rescue services to perform and fulfil their core functions of prevention, protection, response and resilience effectively in a way that responds to the local needs, the changing risks and challenges faced, and that enables collaboration with other emergency services on a range of public safety challenges.”

I would like to record my thanks to the NFCC’s members and staff who provided substantive input to inform our well-balanced return.

Turning back to reform, we understand that no one organisation holds the key. We want to work with Government and across partners to shape and implement further improvements. We are clear that reform does not come without significant investment, including financial, in the FRS and its national functions, including the NFCC. Such investment will need to take account of all roles across the FRS – on-call firefighters, fire control staff, support staff, and full-time firefighters, the latter appearing to be the primary focus of the White Paper.

Public confidence in fire and rescue services and firefighters remains the envy of many organisations. We carry a collective responsibility to build on that confidence and reputation in how we shape and improve the fire and rescue service for the future and for the benefit of the public.

Yours faithfully



Mark Hardingham QFSM
Chair
National Fire Chiefs Council

**National Fire Chiefs Council
White Paper Consultation Response**

Reforming Our Fire and Rescue Service

PEOPLE

Question 1

To what extent do you agree/disagree that fire and rescue services should have the flexibility to deploy resources to help address current and future threats faced by the public beyond core fire and rescue duties?

- 1. Strongly agree**
2. Agree
3. Neither agree nor disagree
4. Disagree
5. Strongly disagree

The nature, complexity and scale of incidents are changing. Variations include incidents in relation to climate change and terrorism; emerging trends include new hazards such as with alternative fuels and battery energy storage systems, the failing of the built environment, and the increasingly complex needs of vulnerable people living in their own homes. There is a demand for increased capability, and appropriate funding, to deliver an inland water rescue and drowning prevention role for the FRS.

Similarly, we know that the extraordinary is ordinary in community risk, with limited pattern or trend to major incidents requiring flexible and immediate support. These include the 7/7 attacks, the London Riots, wide-area flooding and wildfires across many parts of the UK, the Manchester Arena attacks, the Salisbury attacks, COVID-19 response, and more.

FRS ambition, articulated in Objectives 2 and 5 of Fit for the Future, is to be able to tailor services locally to manage risk in our communities. This is best discharged through excellent Community Risk Management Planning (CRMP) which considers risk trends, emerging risks, and trendless major events, collaboratively, broadly and flexibly. We acknowledge the importance of having a highly-trained and available workforce to deliver this ambition.

Question 2

To what extent do you agree/disagree that fire and rescue services should play an active role in supporting the wider health and public safety agenda?

- 1. Strongly agree**
2. Agree
3. Neither agree nor disagree
4. Disagree
5. Strongly disagree

It is clear from current evidence that, due to an ageing population, the demand pressures in health and public safety are becoming ever more pressing across all local communities. The FRS has resources and capabilities that can help address this, subject to appropriate funding, reform and political/operational will across partners and government.

In Fit for the Future our ambition is to protect the most vulnerable people in our communities, tackling the health inequalities that put their wellbeing at risk. This can include preventing accidents by identifying and explaining how people are at risk and helping them if an accident happens; responding to urgent medical emergencies, such as heart attacks, in advance of the ambulance service; and supporting the ambulance service when demand is high, where fire service capacity and capability allows.

The FRS has professional and capable employees owning a wide set of skills knowledge and experience. To bring these to bear and realise this ambition for the significant benefit of the public will need to be supported by proper provisions within employee roles, reward and training.

Question 3

To what extent do you agree/disagree that the business continuity requirements set out in the Civil Contingencies Act 2004 provide sufficient oversight to keep the public safe in the event of strike action?

6. Strongly agree
7. Agree
8. Neither agree nor disagree
- 9. Disagree**
10. Strongly disagree

If the majority of firefighters and other staff withdraw their labour, no amount of making fire authorities responsible for business continuity will fully address the impact on the service.

The Civil Contingencies Act (CCA) does not bring sufficient oversight to keep the public safe in the event of strike action. Unless any legislative change, through the CCA or elsewhere, comes with the tools to ensure industrial action provides for the maintenance of a base level of operational cover in business-critical roles, or in the event of a major incident, then the outcomes will likely remain the same.

In this case it would end up being a further shifting of responsibility away from government and onto fire authorities and chief fire officers, rather than offering substantive assistance.

Question 4

To what extent do you agree/disagree that the current pay negotiation arrangements are appropriate?

1. Strongly agree
2. Agree
3. Neither agree nor disagree
4. Disagree
- 5. Strongly disagree**

Question 5:

Please provide the reasons for your response

The NFCC believe that the current arrangements for negotiating pay in the fire and rescue service require significant reform. They are not providing satisfactory outcomes for firefighters, fire and rescue services and most importantly, the public. Pay reform has been raised as a

fundamental issue for the sector for many years and the current arrangements do not appear to be able to resolve the issues, leading to growing frustration from staff, the employers, fire and rescue services (FRS) and the relevant trade unions. Pay for FRS staff has fallen behind other comparable sectors and needs to be fundamentally changed in terms of quantum, structure and skills reward.

The NFCC believes that as part of any reform of the negotiation arrangements for pay it is vital that these structural arrangements are addressed first and a modern system of pay and reward is introduced that ensures FRS can recruit, retain and motivate high quality staff at all levels. The NFCC believe that this will require sustainable investment from the government but, if it is linked to flexible and modern terms and conditions, there is a clear business case for this investment which will deliver the comprehensive vision for the sector outlined in Fit for the Future.

Future pay negotiation arrangements must ensure that all relevant stakeholders have a clear voice and the ability to influence the direction taken. At present the NFCC, who are tasked with delivering the expectations on (and direction to) the sector from government and ultimately the public have a limited opportunity to influence the negotiation process. The government, who ultimately hold the purse strings and set the fiscal policy aren't represented either and this appears to hamper progress with either pay or changes to terms and conditions.

Clarifying the arrangements around how pay and terms and conditions issues are addressed going forward is important. The NFCC support the proposal in the White Paper to carry out an independent review of the current pay negotiation processes. The White Paper seems to focus significantly on pay rather than wider terms and conditions and the NFCC believe it is important that any review examines terms and conditions issues at the same time. Terms and conditions have not sufficiently modernised to reflect the changing risk environment facing our communities and therefore the role the public expect and need the FRS to undertake.

The government also need to reflect on the overall industrial relations climate in the sector whilst considering any future pay and terms and conditions negotiation processes. The NFCC welcomes the recognition in the White Paper that the current arrangements can hinder flexibility and speed of response to emerging risks. Ensuring that all relevant stakeholders have a proportionate voice in determining terms and conditions and pay is important, but the current arrangements are not conducive to a modern and flexible emergency service that can respond flexibly, quickly and decisively to support our communities when they are facing new risks, unforeseen circumstances or unique challenges.

Future arrangements will also need to take account of other proposed changes outlined in the White Paper. For example, if chief fire officers are given operational independence and corporation sole status this could fundamentally change the employer/employee relationship that currently exists. It is important that these changes are also sustainably funded and that they are considered together rather than in isolation.

Question 6

To what extent do you agree/disagree that consistent entry requirements should be explored for fire and rescue service roles?

1. Strongly agree
2. Agree
3. **Neither agree nor disagree**
4. Disagree
5. Strongly disagree

Question 7

Please provide the reasons for your response.

Fit for the Future commits to four objectives relating to competence; attracting the right employees; retaining employees through a positive culture; and developing skilled leaders. It says: *“Employees will be selected, trained and managed to achieve their full potential. There will be a consistent approach to maintaining and improving their knowledge and skills within every role in the service, with clear expectations set in an open culture of performance review and development.”*

The NFCC is committed to recruiting the right people through attraction and selection. Entry requirements that support this would be helpful. The NFCC is cautious, however, about setting arbitrary educational standards for potential employees. Any entry requirements need to reflect the actual needs of the roles that will be fulfilled.

An integrated approach to recruitment, development, and performance management based on the true expectations of all employees, including those in a leadership role, is critical. The NFCC has recently established a ‘Recruitment Hub’ to support such developments.

The White Paper concentrates primarily on whole-time firefighters, where there is a greater volume of applicants. However, it must be recognised that many FRS rely heavily upon recruiting and keeping on-call firefighters where the volume of suitable applicants often does not meet demand. The implications of any recruitment standards on the recruitment of on-call firefighters requires careful consideration to ensure it doesn’t further increase the risk associated with recruitment, retention and availability.

Recruitment and retention of employees from all backgrounds must be improved; the equality impact of the application of revised entry standards must be considered in this context.

Question 8

To what extent do you agree/disagree that other roles, in addition to station and area managers, would benefit from a direct entry and talent management scheme?

1. Strongly agree
2. Agree
3. Neither agree nor disagree
4. **Disagree**
5. Strongly disagree

Creating a direct entry scheme is a commitment made by the NFCC, which is fully supportive of the development of multi-faceted talent management schemes. NFCC is currently leading the development of new national schemes at Station and Area Manager with several ‘early adopter’ FRS supporting the work.

The implementation of the schemes is a considerable undertaking and is drawing from the

learning of other organisations who have provided similar schemes, with success and failure along the way. With this in mind, the current schemes should be allowed to continue at their planned and measured pace. The learning that will arise should be carefully considered in terms of the adaption of these schemes, and any decision to extend to additional roles can be a properly informed one, at the right time and with clarity about the investment required to ensure success.

PROFESSIONALISM

Question 9

To what extent do you agree/disagree with the proposed introduction of a 21st Century leadership programme?

1. Strongly agree
2. **Agree**
3. Neither agree nor disagree
4. Disagree
5. Strongly disagree

Question 10

Please provide reasons for your response.

This work has been underway for some time (see NFCC People Strategy 2017–2022¹) with the targeted resources available.

By creating a clear link between the leadership fire standards in development, the operational competence standards developed and the Core Code of Ethics, the NFCC has been, and continues to work towards, a clear framework of attraction, recruitment, development, progression, and professionalism. This is underpinned by a People Strategy and a Leadership Strategy. This strategy was developed by the NFCC to support inclusive stakeholder engagement and achievement of the relevant Fire Standards.

FRS need support with the end-to-end employee lifecycle, which the People Programme has been addressing. Latterly the Leadership projects have built on this endeavour through work including:

- Oversight and contract management of the Executive Leadership Programme which is the replacement/successor of the Brigade Command Course. This is a leadership-focused strategic development programme delivered by a highly-regarded academic institute to support those aspiring to the most strategic roles within the sector. The ELP has recently achieved a highly-sought-after international award ('The European Foundation for management development – excellence in practice' silver award).
- The development and production of a Leadership Framework to define the expectations for good development for all staff and for those aspiring to or in leadership positions.
- The inclusion of positive leadership within the Core Code of Ethics.
- The development of a supervisory leadership development programme with external accreditation and delivery through a professional partner against established and

¹ [Fire and Rescue People Strategy 2017/2022 | NFCC CPO \(ukfrs.com\)](#)

proven competence standards. This programme will be available free of charge (20 licences per service each year for two years) to all FRSs.

- The development and launch of a sector-wide Coaching and Mentoring portal to supply quality, consistency, access and coordination between coaches and mentors.
- The production of a 'Talent Management Framework' which provides a central repository of strategy, policy and products from across the sector, and beyond which supports FRSs to access good practice material in support of their own strategy, policy or pathway development.
- Work is underway to develop 'Strategic CPD Masterclasses' which are designed to support the ongoing knowledge and development of staff aspiring to, or in, strategic leadership positions in corporate governance topics such as finance, risk, law, etc. These masterclasses will contain the latest positions and be updated regularly to ensure strategic leaders understand key developments and can ensure good corporate governance is maintained up-to-date and to the highest standards.
- Building on the Supervisory Leadership Development Programme, the business case has been accepted and in Q3 of 2022, the Middle Manager Leadership Development Programme design will begin as a project. This will build from the supervisory syllabus and align with the Core Code of Ethics and leadership framework to create clear line of sight between the attraction and recruitment approaches, through all levels of leadership development including up to the Executive Leadership Programme.
- The Executive Leadership Programme contract is due for renewal in 2024, which will be a key opportunity to review and refresh the syllabus against which a new contract will be procured.
- Through the elevation of the Leadership Project to become a full programme within the NFCC Portfolio, the programme scope will include the development of a revised NFCC Leadership Strategy, closely aligned with and integral to the NFCC People Strategy.

The 21st Century Leadership programme needs to be appropriate and fit for the 21st Century. As drafted, it seems that a strategic command course, similar to Policing, is being proposed that is a statutory requirement for appointment to senior level. This must be designed in the right way to achieve its goals.

The NFCC is supportive of the need for clear standards that express the expectations of individuals, the availability of a modular development programme and integration of development with workplace performance and assessment, as expressed in Fit for the Future. We do not favour a return to a single prescriptive course that all attend, irrespective of their needs.

Question 11

To what extent do you agree/disagree that completion of the proposed 21st century leadership programme should be mandatory before becoming an assistant chief fire officer or above?

1. Strongly agree
2. Agree
3. Neither agree nor disagree
4. Disagree
5. **Strongly disagree**

The NFCC advocate the right leadership development, at the right time for the right people, based on individual experience and organisational need. The NFCC also support ongoing professional development for the continuous improvement and cultural development of the FRS.

For many this would be development through the NFCC leadership programmes, as previously set out. However, FRS, and those aspiring to be its future senior leaders, should have the flexibility provide leadership development that meets individual needs, or to recruit senior leaders who have received leadership development and experience through different arrangements that are then considered on their merits.

Question 12

To what extent do you agree/disagree that each of the activities outlined above are high priorities for helping improve the use and quality of fire and rescue service data?

1. **Strongly agree**
2. Agree
3. Neither agree nor disagree
4. Disagree
5. Strongly disagree

The NFCC strongly agrees that data is a vital asset that underpins our work and is essential in driving further improvements in effectiveness and efficiency.

The activities outlined in the consultation appear to describe some of the first steps in building capability and capacity in this area but there are others that are equally important which we set out later.

Question 13

What other activities, beyond those listed above, would help improve the use and quality of fire and rescue service data? Please give the reasons for your response.

To empower FRS to innovate and really drive sustainable change, we need to further improve and exploit our data. The NFCC's data plan covers five themes:

- Strategy;
- Standards;
- Collection;
- Analytics, and;
- Engage, Promote, Motivate, Collaborate

This framework will deliver the priorities set out in the consultation once developed and embedded. The NFCC published its first [NFCC Digital and Data Strategy](#) in June 2020. Following stakeholder workshops with the Home Office and HMICFRS in late 2021 and early 2022, this is currently being updated to align with Fit for the Future and to secure improvement over the next five years.

The NFCC has developed the first Data Management standard which is scheduled for publication in July 2022. In developing the new Data Management Fire Standard, the NFCC has set out standards for FRS to better capture, analyse and utilise that data.

A fundamental challenge lies in the lack of national collated and available data sets with clear and consistent data definitions. Many datasets services use for comparison, or to attempt to show progress, are out-of-date.

NFCC are developing National Data Analytics Capability to provide the right capacity and capability to effectively analyse national data, helping develop insight that will influence strategic direction and investment.

The NFCC has recognised the need to engage, promote, motivate and collaborate our community of analysts, stakeholders across government, the international fire community, and the private sector.

Question 14

To what extent do you agree/disagree that each of the activities outlined above are high priorities for improving the use and quality of fire evidence and research?

1. **Strongly agree**
2. Agree
3. Neither agree nor disagree
4. Disagree
5. Strongly disagree

Question 15

What other activities, beyond those listed above, would help improve the use and quality of evidence and research on fire and other hazards? Please provide the reasons for your response

Research is key for organisational learning and development. NFCC ambition in this area is expressed in Fit for the Future Improvement Objective 12, committing to *Identify and access all the key information and data to inform organisational learning.*

To support our commitment to better use of research, the NFCC has established an Academic Collaboration, Evaluation, and Research (ACER) group. ACER will drive continuous improvement and evidence-based practice.

ACER will further strengthen the breadth of organisational learning where safety events almost always have links across the three FRS functions of Prevention, Protection and Response. The group will provide greater rigour to ensure that NFCC activity to support FRS in their learning application does so across all these functions to drive continuous improvement and evidence-based practice. NFCC has recently appointed an academic chair and is now working to establish the wider academic membership of the group with an expectation that it will meet for the first time in the autumn.

Collaboration with the Home Office to enhance and build upon these arrangements is welcomed through further fire reform in this area.

Whilst in its infancy, should it prove successful, any central government research capability for fire should link to that forum which could potentially expand the opportunities that exist for services and the public to benefit from what research findings provide. Such arrangements should seek to raise the profile of FRS academic research requirements and capabilities

which do not currently benefit from a profile that enables sufficient access to national funding for research to help keep communities safe.

Question 16

To what extent do you agree/disagree with the creation of a statutory code of ethics for services in England?

1. Strongly agree
2. Agree
- 3. Neither agree nor disagree**
4. Disagree
5. Strongly disagree

The NFCC welcomes the focus on behaviours and ethics. The NFCC, as part of the Independent Fire Standards Board, has created a Code of Ethics Fire Standard.

The NFCC, in collaboration with the National Employers, the Local Government Association and the Association of Police and Crime Commissioners produced the Core Code of Ethics and associated guidance for the FRS.

Through the implementation support we provide; we believe good progress is being made in embedding this within every fire and rescue service. This approach allows local tailoring within diverse governance arrangements, setting the Core Code into the context of each service.

More information about the clear benefits associated a new statutory code should be developed. A review of the Core Code may be appropriate after two – three years in operation.

Question 17

To what extent do you agree/disagree that placing a code of ethics on a statutory basis would better embed ethical principles in services than the present core code of ethics?

1. Strongly agree
2. Agree
- 3. Neither agree nor disagree**
4. Disagree
5. Strongly disagree

It is not yet clear how prescribing a single prescriptive code would be more effective across different fire and rescue service governance and organisational arrangements. Citation of the extant Code in the National Framework, which FRS must have due regard to, maybe more appropriate and flexible.

Question 18

To what extent do you agree/disagree that the duty to ensure services act in accordance with the proposed statutory code should be placed on operationally independent chief fire officers?

1. Strongly agree
- 2. Agree**
3. Neither agree nor disagree

4. Disagree
5. Strongly disagree

The NFCC believes that the appointment, performance and conduct management of a CFO is for the fire authority under whichever governance arrangements exist locally. CFOs should be held to account in terms of their performance against clearly set expectations, which include the Code of Ethics. The appointment, performance and conduct of staff is the responsibility of operationally independent CFOs.

Question 19

To what extent do you agree/disagree with making enforcement of the proposed statutory code an employment matter for chief fire officers to determine within their services?

1. Strongly agree
2. **Agree**
3. Neither agree nor disagree
4. Disagree
5. Strongly disagree

The appointment, performance and conduct of staff is the responsibility of operationally independent CFOs.

Question 20

To what extent do you agree/disagree with the creation of a fire and rescue service oath for services in England?

1. Strongly agree
2. Agree
3. Neither agree nor disagree
4. **Disagree**
5. Strongly disagree

Question 21

Please give the reasons for your response.

At this stage it is not clear what additional benefit would be achieved.

The White Paper sets out the ambition for a 21st century fire and rescue service. Attestations and oaths have a historical context and a different purpose and place in other industries, typically reserved for senior office holders, constables, judiciary, and service personnel. The benefits of how a proposed oath would support and complement the Code of Ethics and the local values is unclear.

Question 22

To what extent do you agree/disagree that an Oath would embed the principles of the Code of Ethics amongst fire and rescue authority employees?

1. Strongly agree
2. Agree
3. Neither agree nor disagree
4. **Disagree**

5. Strongly disagree

An oath risks confusing the mandate of a Code of Ethics, a Fire Standard, and the mandate of both within the National Framework. Combined with its unclear purpose, the evidence about how it would further embed their principles is also unclear.

Question 23

To what extent do you agree/disagree with an Oath being mandatory for all employees?

1. Strongly agree
2. Agree
3. Neither agree nor disagree
- 4. Disagree**
5. Strongly disagree

Our response to this question assumes an oath has been established for the FRS. See responses to questions 21 – 22.

Should an oath be developed, it should take account of all staff who work in a FRS to ensure that the wording of the oath itself is inclusive and supports an inclusive culture. The implementation would also need to consider if this were to be applied to new staff, existing staff, promoted staff, and whether this was on a compulsory or voluntary basis for existing staff.

There may well be unintended consequences where some employees, for whatever reason, decide that they already apply the Code of Ethics, have never been subject to anything that suggested inappropriate behaviour, but choose not to 'sign up' to the oath. This has the potential to impact on the wider benefits of the application of the Code of Ethics.

Question 24

To what extent do you agree/disagree that breach of the fire and rescue service oath should be dealt with as an employment matter?

1. Strongly agree
- 2. Agree**
3. Neither agree nor disagree
4. Disagree
5. Strongly disagree

Our response to this question assumes an oath has been established for the FRS. See responses to questions 21 – 22.

The range of matters caught under employment law is wide-ranging. In a well-managed FRS, conduct matters can be effectively dealt with by way of existing employment law doctrines. In terms of the oath, the enforcement of staff conduct should be a matter for an operationally independent CFO.

Question 25

To what extent do you agree/disagree that the five areas listed above are priorities for professionalising fire and rescue services?

1. Strongly agree
- 2. Agree**
3. Neither agree nor disagree
4. Disagree
5. Strongly disagree

The NFCC is supportive of these areas, with more information required in some areas.

Question 26

What other activities, beyond the five listed above, could help to professionalise fire and rescue services?

The Fit for the Future framework sets out the 12 Improvement Objectives that support a 21st century FRS. These should be embedded within government strategy as the principal means of prioritising deliverables in the NFCC and Home Office collaboration activities.

The Fire Standards Board and the new standards it has produced, underpin the professionalism of FRS. They function as a benchmark and clearly outline expectations, which is a welcome evolution of the National Fire Framework.

Standards should be given time to take full effect within FRS and realise the intended benefits. The NFCC Implementation Team support that process with FRS.

The existing review of National Occupational Standards (NOS) and the functional review will support the continued professionalisation of FRS. The achievement of a suite of competency frameworks, each linking to the respective Fire Standard will benefit FRS. Providing further mandate for that work by maintaining a strong statement of support for the NFCC and national standards in the National Framework is important.

Question 27

To what extent do you agree/disagree with the creation of an independent College of Fire and Rescue to lead the professionalisation of fire and rescue services?

1. Strongly agree
- 2. Agree**
3. Neither agree nor disagree
4. Disagree
5. Strongly disagree

Question 28

Please provide your reasons for your response

The NFCC supports investment in the Fire national infrastructure that enables and supports improving professionalism in FRS and for the public. Investment from government is welcomed and has supported FRS improvements in recent years. The White Paper's Impact Assessment articulates the College's potential funding demands; this should be additional to the existing investment in the sector.

The NFCC already has a critical role in this national infrastructure and is already performing the functions that are being suggested for a College of Fire and Rescue (College). Understanding the relationship between a College and the NFCC is important, learning lessons from similar arrangements in other sectors. A strength of the NFCC is that its work is

'by the service – for the service'. The NFCC is a UK-wide function and provides products and guidance for every FRS. The impact of an English College of FRS on these UK-wide functions will require further consideration.

The development of the role-scope, operating model, and potential location or virtual operating model for a College should be made in close collaboration with the NFCC.

The demand for subject matter experts in the sector needs to be considered alongside NFCC national initiatives. Disruption to existing work is possible with a simultaneous demand on the same policy areas—this may be exacerbated, pending the development timescale for a College.

GOVERNANCE

Question 29

To what extent do you agree/disagree that Government should transfer responsibility for fire and rescue services in England to a single elected individual?

1. Strongly agree
2. Agree
- 3. Neither agree nor disagree**
4. Disagree
5. Strongly disagree

The NFCC believe CFOs are best placed to manage the operational running of services, recognising that this can only be done effectively with appropriate political oversight through a democratic mandate, good governance, accountability, and robust political decision-making in place.

The NFCC is neutral on the type or form of political governance, simply that it should be good governance in accordance with the widely acknowledged CIPFA/SOLACE established seven principles of good governance and should operate effectively with CFO and senior leadership teams.

Question 30

What factors should be considered when transferring fire governance to a directly elected individual? Please provide the reasons for your response.

Factors that should be considered in any transfer of governance:

- The business case to support a transfer
- Resources, including finances, required to successfully implement a transfer
- The timescales and impact on the governance and service delivery of the FRS in the intervening period
- The lessons learnt from previous transfers and the requirements of various organisations and functions to support such a change
- Ensuring the new governance arrangement is able to operate correctly and effectively at the earliest opportunity.

Question 31

Where Mayoral Combined Authorities already exist, to what extent do you agree/disagree that fire and rescue functions should be transferred directly to these

MCAAs for exercise by the Mayor?

1. Strongly agree
2. Agree
- 3. Neither agree nor disagree**
4. Disagree
5. Strongly disagree

The NFCC believe CFOs are best placed to manage the operational running of services, recognising that this can only be done effectively with appropriate political oversight through a democratic mandate, good governance, accountability, and robust political decision-making in place.

The NFCC is neutral on the type or form of political governance, simply that it should be good governance in accordance with the widely acknowledged CIPFA/SOLACE established seven principles of good governance and should operate effectively with CFO and senior leadership teams.

Question 32

To what extent do you agree/disagree that Government should transfer responsibility for fire and rescue services in England to police and crime commissioners?

1. Strongly agree
2. Agree
- 3. Neither agree nor disagree**
4. Disagree
5. Strongly disagree

The NFCC believe CFOs are best placed to manage the operational running of services, recognising that this can only be done effectively with appropriate political oversight through a democratic mandate, good governance, accountability, and robust political decision-making in place.

The NFCC is neutral on the type or form of political governance, simply that it should be good governance in accordance with the widely acknowledged CIPFA/SOLACE established seven principles of good governance and should operate effectively with CFO and senior leadership teams.

Question 33

Apart from combined authority mayors and police and crime commissioners, is there anyone else who we could transfer fire governance that aligns with the principles set out above?

1. Yes
2. No
3. Nil return

Whilst the NFCC is neutral on the type of political governance, it is notable that the London Fire Commissioner model is a different type of model to those discussed in the White Paper. It is notionally the most operationally independent, with all of the duties, burdens and powers of the fire authority. It is complementary to the considerations of developing the post of CFO as a

corporation sole with political oversight. That model, with political oversight and certain reserved matters as described in earlier questions, may be more consistent if those reserved matters were set nationally, such as through a Fire Standard.

Question 34

If yes, please explain other options and your reasons for proposing them.

A London Fire Commissioner model achieves the principles proposed by the White Paper, but perhaps with even more consistency, if reserved matters are established nationally.

Question 35

To what extent do you agree or disagree that the legal basis for fire and rescue authorities could be strengthened and clarified?

1. Strongly agree
2. **Agree**
3. Neither agree nor disagree
4. Disagree
5. Strongly disagree

Question 36

Please provide the reasons for your response

Our response is based on the strengthening and clarification of the legal basis for FRA being the means to support greater clarity between the role and decision making of an operationally independent CFO and that of the FRA.

Whether in statute, or at the very least clearly set out in the National Framework, such clarity is critical to the excellent delivery of a FRS. Operationally independent CFO and their FRA must be clear about their respective roles and these principles have to be provided and applied consistently across FRS.

Question 37

To what extent do you agree/disagree that boundary changes should be made so that fire and rescue service areas and police force/combined authorities (where present) areas are coterminous?

1. Strongly agree
2. Agree
3. **Neither agree nor disagree**
4. Disagree
5. Strongly disagree

The division and mergers of FRS are disruptive – in terms of organisational culture, delegations and managerial authorities possible across different political governance arrangements, response standards, industrial and employment relations, funding and more.

The impact of a boundary change should be carefully considered through a detailed options appraisal and business case which sets out the benefits against disbenefits, risks and issues.

The question focuses on police force areas—however, important partnership arrangements

exist with Health, Ambulance and Local Authority partners and the impact on those co-terminus relationships must be carefully considered.

Question 38

To what extent do you agree/disagree with ring-fencing the operational fire budget within fire and rescue services run by county councils and unitary authorities?

1. Strongly agree
- 2. Agree**
3. Neither agree nor disagree
4. Disagree
5. Strongly disagree

Question 39

Please provide the reasons for your response

There are potential benefits from being part of a wider County Council and Unitary Authority – both in terms of collaboration, partnership working, wider cultural exposure and being part of a larger ‘parent’ body. There are also inherent risks, especially with the competing service delivery and demand pressures that are evident in functions such as Adult Social Care, Children’s Services and Highways, and the financial and associated service delivery consequence for the wider functions including FRS.

On balance, ring-fencing of the operational (Response, Protection, Prevention, and Resilience) fire budget offers some benefits that enable better medium- to-long-term planning. However, this will always be within the envelope of the overall funding provided through government and local precept and other local sources of income. If the overall funding is insufficient to provide an FRS, then ringfencing that funding does not, on its own, improve service delivery.

The proposal will provide clarity, to an extent, although in many FRS an element of the operational fire budget is then used to fund a range of FRS and other department support functions provided from within the parent body. The level of funding to support this will vary significantly from one FRS to another.

Ringfencing funding for fire and rescue services may provide funding protection against other high-demand services. However, in certain areas, fire funding may benefit from having received supplementary funding during periods of financial constraint or for other investment purposes. The potential loss of the benefit of the latter should be studied and compared to the benefits of the former.

Question 40

To what extent do you agree with this proposed approach (as outlined in the table above)?

1. Strongly agree
- 2. Agree**
3. Neither agree nor disagree
4. Disagree
5. Strongly disagree

Question 41

Do you have any other comments to further support your answer?

The NFCC supports the concept of operationally independent CFOs. The division of roles needs to be clearly set out and the proposal in the White Paper provides a basis from which to build.

The White Paper proposes working with respective organisations to further define this and we welcome the opportunity for such engagement. There will inevitably be matters which are clearly political and sit with the FRA and matters which are clearly operational and sit with the CFO. There will also be matters where the cross-over between the two are more difficult to define and the aspiration for a 'bright clear line' will be more challenging. We welcome engagement to work through those issues to ensure we provide the best arrangements for FRS and the public.

The White Paper does not make a specific proposition in relation to county council fire authorities, which are corporations aggregate, not easily facilitating a single political office-holder.

Question 42

Are there any factors we should consider when implementing these proposals?

Careful consideration should be made to the mechanism for overseeing, monitoring and assuring about respective roles of the Operationally Independent CFO and the FRA in whatever form it exists.

Any reforms that maintain the balance the table currently proposes would need strong language in the National Framework mandating a standard or protocol defining these terms. HMICFRS would need to rigorously enforce their application to 'protect' CFOs not being given the space to make professional/operational decisions.

Question 43

What factors should we consider when giving chief fire officers operational independence?

The NFCC support the proposal to give CFO operational independence in the management and deployment of FRS resources (both people and assets) to meet the risk and demands facing communities, aligned to the statutory duties of the FRS.

This approach is broadly consistent with the arrangements afforded to Chief Constables, Directors of Adult and Children's Services and Directors of Public Health, etc., in the discharge of their duties.

To achieve this there must be clarity in relation to professional and political leadership, specifically the powers afforded to the CFO to exercise powers and carry out duties of the authority under the various statutes, orders, regulations and bye laws and common law.

As such, the NFCC supports the statement within the National Framework which states that each fire and rescue authority must hold this person (CFO) to account for the exercise of their functions and the functions of persons under their direction and control. Effective scrutiny should be assured through good governance.

To attain this there must be clear lines of responsibility and governance that is consistently applied, based on national guidance and standards, as set out previously.

NFCC has consistently stated if fire services are governed by a Police Fire and Crime Commissioner (PFCC), and four already are, it is imperative CFOs roles are safeguarded and have the same standing as a Chief Constable. Currently, Chief Constables have operational independence. The same operational positioning should be in place for CFO, together with the status of the wider FRS alongside police forces.

Various other factors that would require careful consideration include liability, extent of powers, employment relationships, governance, removal of CFO and the need for appropriate checks and balances.

Such a new function needs to be very clearly set out either in statute or through the National Framework. It then needs to be included in the leadership programmes for senior leaders and fire authority members to ensure its operation is understood and applied appropriately.

Question 44

What factors should we consider should we make chief fire officers corporations sole?

We would welcome further engagement on this matter as it progresses to ensure that the benefits and risks are clearly understood, together with the strategic policy intent.

Clarity will be required on the duties and burdens that come with the status, e.g., Fire and Rescue Services Act duties, but also all of the other duties as an employer.

This will need to be supported by clear training and development built into the leadership programmes for CFO and fire authorities before they come into the roles.

There are employment matters that will require careful consideration – not least the pensions legislation and scheme eligibility. This will need to take account of the implications whereby the CFO is no longer employed by an FRA as they will be the FRA.

Question 45

To what extent do you agree or disagree that the responsibility for strategic and operational planning should be better distinguished?

1. Strongly agree
2. Agree
3. Neither agree nor disagree
- 4. Disagree**
5. Strongly disagree

Question 46

To what extent do you agree or disagree that the strategic plan should be the responsibility of the fire and rescue authority?

1. Strongly agree
2. Agree
- 3. Neither agree nor disagree**

4. Disagree
5. Strongly disagree

Question 47

To what extent do you agree or disagree that the operational plan should be the responsibility of the chief fire officer?

1. Strongly agree
2. Agree
- 3. Neither agree nor disagree**
4. Disagree
5. Strongly disagree

Q48: Please provide the reasons for your response.

FRS and Fire Authorities appear well versed in the extant arrangements, as set out in the National Framework. NFCC does not view the proposals as a point requiring further clarity or see any significant benefits in terms of FRS reform.

Other comments

Retained Duty System (RDS)

RDS capacity and capability needs distinct consideration. The system and funding that supports all aspects of the On-Call Firefighter duty system—a system which forms the primary part of fire and rescue operational response in rural and semi-rural communities. Reform is needed to improve areas including recruitment, retention, training and development, availability, terms and conditions, and pay and reward. Many of these are topics that require consideration across both RDS and whole-time firefighting response—however, their answers may be very different.

National Resilience

Fire and rescue services manage defined National Risks assigned for Home Office ownership, including Urban Search and Rescue (USAR), Chemical, Biological, Radiological or Nuclear explosions (CBRNe), and High-Volume Pumping. Fire and rescue also contributes to the Police operational response to Marauding Terrorist Attacks (MTA). However, the National Resilience operational infrastructure is used beyond these capabilities, including—for example—supporting FRSs response to the COVID-19 pandemic, mobilisation of the Ukraine convoy, and the national response to the July 2022 heatwave-related fires. Climate-related demand on operational capacity nationally and locally will be an increasing trend demanding increasing capacity, capability and assurance from National Resilience teams.

The capital infrastructure supporting National Resilience functions is being reviewed as part of the New Dimensions 2 project. The importance of maintaining both the National Resilience operational infrastructure that has supported the range of capabilities described, and the capital infrastructure that it relies on is critical and must be considered beyond the lens of the 'official' capabilities assigned for FRS management.