



LONDON FIRE BRIGADE

Decision title

HMICFRS Inspection – Resource implications

Recommendation by
Head of Strategy and Risk

Decision Number
LFC-0010-D

NO PROTECTIVE MARKING

Summary

One of the roles of the new Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services is to support continuous improvement and support fire and rescue services to become more effective. At the same time, based on experiences of previous inspection (and peer support) regimes, this is likely to place a new resourcing requirement on the Brigade to facilitate the inspection process.

Decision

1. The establishment of a project team, for 12 months, within Strategy and Risk department to facilitate the inspection regime be agreed, consisting of:

- 1 x FRS G ([redacted] SRA)
- 1 x FRS F ([redacted] SRA)
- 1 x FRS E
- 1 x FRS D
- 1 x FRS C

at a cost of £149,439 (for the 12-month period). These changes to take effect from 1 May 2018.

Dany Cotton QFSM
London Fire Commissioner

Date 7/5/2018

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LONDON FIRE BRIGADE

Report title

HMICFRS Inspection - Resource implications

Report to

London Fire Commissioner

Date

25 April 2018

Report by

Head of Strategy and Risk

Document Number

LFC-0010

Summary

One of the roles of the new Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services is to support continuous improvement and support fire and rescue services to become more effective. At the same time, based on experiences of previous inspection (and peer support) regimes, this is likely to place a new resourcing requirement on the Brigade to facilitate the inspection process. This paper outlines what progress has been made thus far in developing the inspection regime, the Brigade's preparations and considers the resource implications for the Brigade.

Recommendations:

1. That the potential resource implications of the new HMICFRS inspection regime be noted; and
2. The establishment of a project team, for 12 months, within Strategy and Risk department to facilitate the inspection regime be agreed, consisting of:

1 x FRS G (██████████ SRA)	existing post
1 x FRS F (██████████ SRA)	existing post
1 x FRS E	new post
1 x FRS D	new post
1 x FRS C	new post

at a cost of £149,439 (for the 12 month period). These changes to take effect from 1 May 2018.

Background

1. One of the provisions of the Policing and Crime Act 2017 was the creation of a new independent inspectorate for fire and rescue services in England.
2. On 19 July 2017 the Home Office agreed that Her Majesty's Inspectorate of Constabulary (HMIC) would expand to take on the role of the inspectorate of fire and rescue services in England. The HMIC was renamed Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS).
3. At the Autumn conference of the National Fire Chiefs Council (NFCC) in September 2017 Zoe Billingham, Her Majesty's Inspector for Eastern England and senior responsible officer for HMICFRS's inspections of fire and rescue services (FRS), stated that HMICFRS's promise to the sector would be: *'the inspection will be developed with the FRS. It will be designed to promote improvement and to identify all aspects of the excellent work undertaken by FRSs. We will approach the inspection on a no surprises basis and experts from across the service will be fundamental to the delivery of our inspections'*.

HMICFRS Inspection

4. The inspectorate will consider how effective and efficient FRSs are, highlight good practice and will identify areas where they need to improve so that action can be taken. This will include an assessment of:
 - Effectiveness – how effective is the FRS at keeping people safe and secure from fire and other risks;
 - Efficiency – how efficient is the FRS at keeping people safe and secure from fire and other risks; and
 - People – how well does the FRS look after its people.

This will replace the current system of peer review.

5. The HMICFRS will focus on the inspection of fire and rescue services only and not on their corporate governance or accountability structures (in London, the Mayor's Office).
6. The proposed FRS inspection programme and framework 2018/19 was published on 19 December 2017 for consultation with a closing date of 19 February 2018. Officers drafted a response to HMICFRS on the consultation. The Brigade welcomes the introduction of the inspection programme and framework, however, we asked them to note the Brigade's concern in relation to the resources required to support the more rigorous regime. The Brigade also noted in the inspection programme that HMICFRS may conduct several different types of inspection, including thematic inspections on individual issues.
7. HMICFRS will inspect all 45 FRSs in three sets of 15 FRSs commencing Summer 2018. Three FRSs have been chosen to pilot the inspection approach. These are: Staffordshire, Suffolk and West Yorkshire fire and rescue services.
8. In years three and four the HMICFRS will move to risk based inspections. This will mean FRSs considered inadequate or requires improvement will be inspected again. Good or outstanding FRSs would not have a second integrated inspection until year five. However, thematic inspections are likely between inspections regardless of a FRS's performance in the initial inspection.

9. The outline timeline produced by HMICFRS is shown below:

Three pilot inspections	Early 2018
Publication of inspection programme	March 2018
First tranche of 15 inspections	Summer2018
Second tranche of 15 inspections	Autumn/Winter 2018
Third tranche of 15 inspections	Spring2019

10. It has been confirmed that London Fire Brigade will be in Tranche 3, in 12 months time from now.

11. The inspection will focus on a single inspection with onsite fieldwork of about eight to ten days duration by a team of approximately 10 people. This will be supported by data returns and a self-assessment produced by the FRS in advance. There are likely to be no-notice on site visits and other meetings prior to the inspection itself.

12. HMICFRS will use a range of methods to gather information to inform their assessments. These will include: analysis of documents and data; reviews of operational incidents; surveys of the public, and of fire and rescue services staff; interviews; focus groups; and observations of fire and rescue practice.

13. Following the first round of full inspections, HMICFRS intends to move to a risk-based inspection programme.

14. The fieldwork will be underpinned by a background monitoring framework, as already utilised with the police - Police Efficiency, Effectiveness and Legitimacy inspection framework (**PEEL**). However, for FRSs, leadership will replace the legitimacy strand.

15. The draft inspection methodology was published as part of the proposed inspection programme and framework (attached as Appendix 1). The methodology consists of three core areas which are then split into 11 diagnostic questions and 61 sub-diagnostic questions:

Core	Diagnostic	Sub-diagnostic
1. How effective is the FRS at keeping people safe and secure from fire and other risks.	1.1 How well does the FRS understand the risk of fire and other emergencies	6 sub-diagnostic questions
	1.2 How effective is the FRS at preventing fires and other risks	5 sub-diagnostic questions
	1.3 How effective is the FRS at protecting the public through the regulation of fire safety	7 sub-diagnostic questions
	1.4 How effective is the FRS at responding to fires and other emergencies	7 sub-diagnostic questions

Core	Diagnostic	Sub-diagnostic
	1.5 How effective is the FRS at responding to national risks	5 sub-diagnostic questions
2. How efficient is the FRS at keeping people safe and secure from fire and other risks.	2.1 How well does the FRS use resources to manage risk	8 sub-diagnostic questions
	2.2 . How well is the FRS securing an affordable way with providing its service now and in the future	9 sub-diagnostic questions
3. How well does the FRS look after its people.	3.1 How well does the FRS promote its values and culture	5 sub-diagnostic questions
	3.2 How well trained and skilled are FRS staff	3 sub-diagnostic questions
	3.3 How well does the FRS ensure fairness and diversity	3 sub-diagnostic questions
	3.4 How does the FRS develop leadership and capability	3 sub-diagnostic questions

16. In the **PEEL** programme police forces are assessed and given graded judgments. The categories are:

- Outstanding;
- Good;
- Requires improvement; and
- Inadequate.

17. In **PEEL**, **Good** is the expected graded judgment. It is based on policy, practice or performance that meets pre-defined grading criteria that are informed by any relevant approved professional practice, standards or approved practice.

18. If the policy, practice or performance exceeds what is expected for Good then consideration will be given to a graded judgment of **Outstanding**. If there are shortcomings in the policy, practice or performance and it does not meet what is expected for Good then consideration will be given to a graded judgment of **Requires improvement**. If, however, there are critical failings of policy, practice or performance and it does not meet what is expected for Good then consideration will be given to a graded judgment of **Inadequate**.

19. The proposed inspection programme and framework confirm that once assessed FRSs will be given a graded judgment. The categories are the same as those discussed above.

20. The Home Office has published its draft 'Fire and Rescue National Framework for England' for consultation. The Framework was last updated in 2012. The revision embeds the fire reform programme which includes the creation of the new inspectorate for fire and rescue services.

21. The Framework states that all fire and rescue authorities *'must cooperate with the inspectorate and its inspectors to enable them to deliver their statutory function. This includes providing relevant data and information to inform inspections'*.
22. It also states that fire and rescue authorities should give due regard to reports and recommendations made by the HMICFRS and if required *'prepare, update and regularly publish an action plan ... detailing how the recommendations are being actioned'*.
23. In addition, national thematic inspections may take place. These inspections are in-depth examinations of specific FRS matters. These will usually be identified through the HMICFRS monitoring processes or as a result of a commission from the Home Secretary. The inspections will identify areas of strong and weak practice in specific FRSs, but will also result in recommendations that are relevant to the fire and rescue service as a whole. The Home Office can also commission thematic inspections on individual issues. The methodology to be used and impact of resourcing these additional inspections is not known at the moment.

Metropolitan Police Service

24. Officers met with colleagues from the Metropolitan Police Service (MPS) and the Mayor's Office for Policing and Crime (MOPAC) to discuss their experience of the PEEL inspection regime. They indicated that the Brigade should not underestimate the amount of time and effort that may be required.
25. The work and resources required are intensive. The MPS currently have a team of people working full-time on producing the information required and the logistics of the inspection, including arranging meetings with senior officers and the inspectors, arranging focus groups, briefing and debriefing sessions etc.
26. The MPS produce an Action Plan once they receive the final report. This is then used to ensure recommendations/areas for improvement are dealt with. An example is shown as Appendix 2.
27. They also produce detailed 'tracker' spreadsheets to assist in the collation of information, data, recommendations, actions etc.
28. Sir Thomas Winsor, Her Majesty's Chief Inspector of Constabulary, has been appointed as Chief Fire and Rescue Inspector. In a statement upon his appointment he stated *'HMICFRS will approach the inspection of fire and rescue services ... with the same degree of thoroughness as it inspects the police'*.
29. Various FRSs are already voicing concern about the impact of the more rigorous inspection regime in relation to the resources required to support it. They are, through engagement with their local constabularies, aware that supporting HMIC's PEEL inspection regime is resource intensive. There is no reason, at this stage, to believe that the FRS inspection regime will be any less onerous or resource intensive.

Previous inspection regimes

30. The Brigade has experience of being inspected/audited by external organisations.
31. Over a period in 2006/07 the Brigade undertook an Operational Assessment of Service Delivery (OASD). OASD was an assessment of how well the Authority was planning, organising and delivering its operational services. The OASD was in two parts, firstly a self assessment was completed using a standardised template against five areas (Risk Analysis, Preventative and Protection Services, Operational Preparedness, Call Management and Incident Support and

Emergency Response), supported by a context statement outlining particular issues impacting on London. Secondly, a visit from a DCLG review team which was undertaken over three days in November 2006. The review team comprised six uniformed officers seconded from other Fire and Rescue Authorities to the DCLG team.

32. The amount of work and resources required to complete the OASD was very onerous. The assessment was overseen by the then Director of Corporate Services, Head of Performance Management and Improvement (FRS Grade H), Group Manager and three other staff (FRS Grades G, F and E). For a period of several weeks prior to the assessment the staff carried out the preparation work in addition to their day duties. However, during the weeks before and during the assessment the staff were working full time on it, in some cases 12 hour days during the visit.
33. In 2014, the Authority requested a LGA Fire Peer Challenge based on a number of areas – value for money, risk information sharing, operational competence and the industrial relations framework and seven standard key assessment areas.
34. Peer challenge was a core element of the Local Government Association's approach to support sector led improvement. It aimed to build on the long standing commitment of fire and rescue services to sector led improvement. It was based on a number of key principles, including FRSs are responsible for their own improvement. It was intended to be a proportionate process so that FRSs could manage the preparation appropriately in order to maximise the benefits arising from the peer challenge.
35. The challenge team of 13 members and senior operational officers from a variety of FRSs spent over five days, in two visits, on site and saw over 200 members of staff through a variety of focus groups and interviews and visited eight stations.
36. Again, the Brigade committed a great deal of time and resources for this process. The process largely consisted of two parts; preparing the self-assessment, and then organising and facilitating the two site visits. For the self-assessment, 10 subject matter experts in the Brigade contributed to the document, which was overseen by the then Deputy Commissioner, Head of Information Management (TMG level B) and Head of Business Management (FRS Grade G). The site co-ordination and visit was managed by the Head of Business Management and a supporting Communications Officer (FRS Grade D). Overall, the process took nine months from starting the self-assessment to final delivery of the peer challenge report and the Brigade's response to the recommendations.

Project Management

37. Based on the information provided thus far a timeline for the inspection of LFB has been drafted assuming a fieldwork commencement date of 1 March 2019 (Appendix 3). This is for illustrative purposes only and can be amended when dates of Tranche 3 are finalised. The timeline indicates that there is a lead in period of at least three months before Inspectors carry out the fieldwork.

Recommendations

38. As stated earlier there is no reason to expect the new inspection regime will be any less rigorous than the PEEL process and the self-assessment elements etc. of the OASD and Peer Challenge processes.
39. With in mind it is recommended that a project team is created within Strategy & Risk Department, under the Head of Performance and Risk, As stated in the paragraphs above

Strategy and Risk have in the past been the lead department with regard to audit, review and inspection

40. The project team should be created with immediate effect to prepare officers and departments for the inspection and handle the pre-inspection work. The HMICFRS have sent out data collection requests. There is a four week completion deadline.
41. The team should be created for 12 months in the first instance this will allow for data collection and pre-inspection work and liaison with departments. It will also ensure systems can be put in place to action any recommendations arising from the inspection.
42. To oversee the work of the Team the Performance Manager (FRS F) should be given a SRA and the post renamed to Performance Manager and Service Liaison Officer. This recognises that that post is the recognised lead for Inspection and is the liaison point for the Brigade and the HMICFRS. This acknowledges the additional responsibility placed on the role. They will be responsible for all aspects of the Inspection process and will be in close contact with the HMICFRS's nominated Senior Liaison Lead for the Brigade (Joy Smith). The Service Liaison Officer (SLO) acts as a single point of contact to coordinate communication and requests for HMICFRS. The Performance Manager currently leads on planning and performance and liaises closely with all departments across the Brigade.
43. It is also recommended that the Head of Performance and Risk (FRS G) be given a SRA. This role will oversee the Inspection process at a strategic level. The Head of Performance and Risk oversees performance, planning and risk management frameworks across the Brigade and as such is in close liaison with Top Management Group (TMG) and the Commissioner's Board (CB). They will ensure a strategic focus on the Inspection process.
44. It is recommended that the team consist of:
 - 1 x FRS G (██████████ SRA)
 - 1 x FRS F (██████████ SRA)
 - 1 x FRS E
 - 1 x FRS D
 - 1 x FRS C.
45. The FRS E will play an important role in the Brigade's participation in the HMICFRS inspection programme. They will provide a vital link between departments, Strategy and Risk and the inspectorate team.
46. The FRS D will support the FRS E in their role to facilitate the inspection process. They will assist in gathering and collating relevant information in preparation for the inspection. They will be responsible for developing administrative and monitoring systems to assist in the collation of data and evidence as part of the inspection process. They will also be responsible for action plans and monitoring arising from inspections.
47. The FRS C will act as support officer for the inspection process. They will be responsible for arranging and clerking meetings with principal management, officers etc. They will also be responsible for ensuring the necessary documentation is produced in the correct format and in a timely fashion to assist both officers and the inspection team.
48. The cost of the changes will be:

Post	Unit Cost (£)	Cost (£)
FRSG	83,423	2,086
FRS F	65,301	6,530
FRS E	53,279	53,279
FRSD	46,918	46,918
FRSC	40,626	40,626
	Total	£149,439

49. These changes to take immediate effect in order to allow sufficient time to prepare adequately well for the inspection.

Finance comments

50. This paper sets out the Brigade's preparations in preparing for the new HMICFRS inspection regime and the resulting resource implications. The report recommends that an additional three posts are created and two new SRAs are awarded to existing staff, to facilitate the inspection regime. This is at a forecast cost of £149k, with £136k of the spend in 2018/19 and the remaining £13k in 2019/20. This additional funding requirement could be met by establishing a new earmarked reserve as part of the review of the outturn position for 2017/18.

Workforce comments

51. There are no direct implications associated with the contents of this report requiring consultation.

General Counsel comments

52. General Counsel has reviewed this report and has no comments

Sustainability implications

53. There are no direct environmental or sustainability implications associated with the contents of this report.

Equalities implications

54. There are no direct equalities implications arising from this report for the Brigade.

List of Appendices to this report:

1. Methodology
2. Example of MPS data sheet
3. Illustrative timeline

Consultation [Note: this section is for internal reference only- consultation information for public consideration should be included within the body of the report]

Name/role	Method consulted
Deputy Commissioner, Safety & Assurance	Draft circulation of report

Core	Diagnostic	Sub-diagnostic
<p>1. How effective is the FRS at keeping people safe and secure from fire and other risks?</p>	<p>1.1 How well does the FRS understand the risk of fire and other emergencies?</p>	1.1.1 How well does the FRS engage with the local community to build up a comprehensive risk profile?
		1.1.2 To what extent does the FRS use information from other sources (e.g. health and social care data, population and demographic data) to build the risk profile?
		1.1.3 How well does the FRS define the level of community risk, including those communities most at risk, hard to reach, hidden (e.g. unscrupulous landlords, overcrowded dwellings) or affecting the most vulnerable people?
		1.1.4 To what extent does the FRS undertake regular liaison with relevant bodies to ensure a common understanding of risk, including fire standards and requirements?
		1.1.5 To what extent are the results of preventative or protective activity used to ensure a common understanding of risk?
		1.1.6 How well does the FRS identify and assess current, emerging or future changes in the risk of fire and other risks?
	<p>1.2 How effective is the FRS at preventing fires and other risks?</p>	1.2.1 To what extent is preventative activity, such as the Home Fire Safety Check programme, focused on those most at risk?
		1.2.2 How well does the FRS raise awareness and campaign to prevent fires and promote community safety?
		1.2.3 What progress has the FRS, with partners, achieved in preventing fires and keeping people safe?
		1.2.4 How well does the FRS work with partner organisations to promote road safety and reduce the numbers killed and seriously injured on the roads?
		1.2.5 How well does the FRS work with partners to tackle fire setting behaviour and support the prosecution of arsonists?
	<p>1.3 How effective is the FRS at protecting the public through the regulation of fire safety?</p>	1.3.1 To what extent is enforcement and inspection based on risk?
		1.3.2 To what extent is a systematic, consistent and robust Fire Safety Audit undertaken by FRS staff?
		1.3.3 How well is information on risk communicated throughout the FRS?
		1.3.4 How well does the FRS take enforcement action against those who fail to comply with fire safety regulations?
		1.3.5 How well does the FRS work with other enforcement agencies to share information on risk and take joint enforcement action (e.g. local authority licensing, building control and trading standards officers)?
		1.3.6 To what extent is the FRS working in partnership to reduce the burden of unwanted fire signals?
		1.3.7 To what extent does the FRS engage with local business or large organisations to share information and expectations on compliance with fire safety regulations?
	<p>1.4 How effective is the FRS at responding to fires and other emergencies?</p>	1.4.1 To what extent does the FRS provide a proportionate response to incidents on the basis of risk and vulnerability?
		1.4.2 How well does the FRS communicate information about risk and vulnerability?
		1.4.3 How well does the FRS command fire service assets at incidents?
		1.4.4 How well does the FRS identify vulnerability and safeguard vulnerable people at incidents?
		1.4.5 How well does the FRS communicate information about incidents to the public?
		1.4.6 To what extent are consistent, rigorous and open systems in place to evaluate operational performance and make operational improvements?
		1.4.7 How well does the FRS exchange learning with other FRSs, including learning from national incidents?

Core	Diagnostic	Sub-diagnostic
	1.5 How effective is the FRS at responding to national risks?	<p>1.5.1 To what extent has the FRS established arrangements to be able to supplement resources in the event of extraordinary need, such as a flood, or a major incident?</p> <p>1.5.2 How well has the FRS established site specific response plans for high risk premises?</p> <p>1.5.3 To what extent has the FRS demonstrated it is interoperable with other FRSs to ensure an effective and efficient cross-border response?</p> <p>1.5.4 To what extent does joint training and joint exercising help the FRS to plan for and test arrangements for dealing with maior multi-agency incidents?</p> <p>1.5.5 How well prepared is the FRS to form part of a multi-agency response to a community risk identified by the local resilience forum, including a marauding terrorist attack?</p>
2. How efficient is the FRS at keeping people safe and secure from fire and other risks?	2.1 How well does the FRS use resources to manage risk?	<p>2.1.1 To what extent do FRS plans address the risks identified in the IRMP (integrated risk management plan)?</p> <p>2.1.2 To what extent are the FRS plans built on sound planning assumptions, subject to informed challenge and meet financial requirements?</p> <p>2.1.3 How well does the FRS allocate resources to preventative, protective and response activity?</p> <p>2.1.4 To what extent has the FRS considered national requirements?</p> <p>2.1.5 How well does the FRS ensure that the workforce's time is productive, making use of a flexible workforce and flexible working patterns?</p> <p>2.1.6 To what extent is the FRS actively exploring all opportunities for collaboration within and beyond the fire sector?</p> <p>2.1.7 How well does the FRS ensure there are mechanisms in place for monitoring, evaluation and review of collaborations (including benefits realisation and outcomes)?</p> <p>2.1.8 To what extent are business continuity arrangements in place and how often are these tested?</p>
	2.2 How well is the FRS securing an affordable way of managing the risk of fire and other risks now and in the future?	<p>2.2.1 To what extent does the FRS understand and is taking action to mitigate the main/ significant financial risks?</p> <p>2.2.2 To what extent does the FRS have a track record for achieving savings and closing any residual future budget aaos?</p> <p>2.2.3 To what extent can the FRS demonstrate sound financial management of principal non-pay costs (inc fleet and equipment) through benchmarking, contract renegotiation, and ioint procurement?</p> <p>2.2.4 How well do FRS plans make the best use of the opportunities, and respond to the risks, presented by changes in technology?</p> <p>2.2.5 To what extent does the FRS estate/fleet strategy, and changes to estate/fleet, support current and future service provision?</p> <p>2.2.6 To what extent is the FRS continuing to make savings to invest for future innovation?</p> <p>2.2.7 How well does the FRS use reserves to improve efficiency, enable innovation and new ways of working?</p> <p>2.2.8 To what extent is the FRS influencing how it can work with others in the future in order to improve efficiency?</p> <p>2.2.9 To what extent has the FRS considered and exploited external funding opportunities, or options for generating income?</p>

Core	Diagnostic	Sub-diagnostic
3. How well does the FRS look after its people?	3.1 How well does the FRS promote its values and culture?	3.1.1 How well does the FRS understand the wellbeing needs of its workforce?
		3.1.2 How well does the FRS take early action to improve the wellbeing of the workforce?
		3.1.3 How well do leaders demonstrate they model and maintain the values the FRS expects of them?
		3.1.4 To what extent is a culture of promoting health, safety and wellbeing evident at all levels in the FRS?
		3.1.5 To what extent has the FRS established a culture of learning and improvement?
	3.2 How well trained and skilled are FRS staff?	3.2.1 How well does the FRS understand the skills and capabilities of its workforce (including the use of technology)?
		3.2.2 How well does the FRS ensure it has the right workforce mix of skills and capabilities?
		3.2.3 To what extent does the FRS have the capacity and capability it needs to both achieve change and operational performance?
	3.3 How well does the FRS ensure fairness and diversity?	3.3.1 How well do leaders seek feedback and challenge from all parts of the workforce?
		3.3.2 How well does the FRS identify and resolve workforce concerns?
		3.3.3 How well does the FRS identify and address potential disproportionality in recruitment, retention and progression for fire-fighters and staff with protected characteristics?
	3.4 How does the FRS develop leadership and capability?	3.4.1 How well does the FRS manage and develop the individual performance of its fire-fighters and staff?
		3.4.2 How fairly does the FRS identify high potential members of the workforce to become senior leaders?
		3.4.3 How fairly does the FRS select for leadership roles at all levels?

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THIS APPENDIX HAS BEEN REMOVED.

THE DATA SHOWN WAS PROVIDED TO THE LONDON FIRE BRIGADE BY A
THIRD PARTY FOR INTERNAL REVIEW PURPOSES ONLY. THE LFB DOES
NOT HAVE PERMISSION TO PUBLISH THE DATA.

APPENDIX 3

