

Fire and Rescue Framework for Scotland 2016

Consultation Report

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INTRODUCTION

This report provides a summary and analysis of the responses received by the Scottish Government to the consultation on the draft Fire and Rescue Framework for Scotland 2016.

The Fire and Rescue Framework for Scotland 2016 (The Framework) is a statutory document (under the Fire (Scotland) Act 2005 as amended by the Police and Fire Reform (Scotland) Act 2012). It outlines Scottish Ministers' expectations of the Scottish Fire and Rescue Service (SFRS) over the next few years, setting priorities and objectives and providing guidance to the SFRS on the execution of its functions in terms of public safety, efficiency and effectiveness. It will replace the current Fire and Rescue Framework for Scotland 2013.

The Scottish Government published a draft Framework for public consultation, which ran from **21 March** to **15 June 2016**. The consultation was open to the public and sought the views of those with an interest in the workings of the SFRS and how it operates to keep communities safe.

The consultation

The consultation asked for views concerning the following sections within the Framework consultation document:

- The 10 strategic key priorities within the 2016 Framework which set out Scottish Ministers' expectations of the SFRS;
- Chapter 1 – Protecting Communities: Risk, Prevention and Response;
- Chapter 2 – The Evolving Role of the SFRS;
- Chapter 3 – Governance, Accountability and Performance; and
- The current Fire and Rescue Framework for Scotland 2013 targets.

The questionnaire contained 17 questions;

- Question 1 sought views on the 10 strategic priorities;
- Questions 2 – 16 sought views on the text set out within specific sections of the Framework; and
- Question 17 sought views on the targets set out in the 2013 Framework, and whether any of these should be retained, or whether some or all should be replaced by new targets.

The consultation was published on the Scottish Government consultation website, and was open to the public for responses from individuals and organisations.

In addition to the general invitation to respond which was set out in a covering letter, the Scottish Government contacted 183 stakeholders/stakeholder organisations to advise them of the consultation and invite responses.

The **10 strategic key priorities** which were consulted upon were as follows -

Performance Measures

1. The SFRS must, in discussion with the Scottish Government, specify appropriate performance measures, to support its Strategic Plan, for the delivery of outcomes relating to the strategic priorities and objectives set out in this Framework.

Safety, Well-being and Prevention

2. The SFRS should fully contribute to improving the safety and well-being of Scotland's communities and embed a prevention focus within the Service. It should ensure that there is a clear process for working with partners to identify the risks faced by communities and individuals so that the SFRS can target activity where it can most effectively contribute to addressing inequalities within and between communities.

Response and Resilience

3. The SFRS should work with other public service partners to evolve a holistic and dynamic process of identification, evaluation and assessment of community risk and Best Value in order to prioritise and target its use of resources to ensure an appropriate response to incidents across Scotland and support improved outcomes for communities. As part of this approach, the SFRS should promote optimal command, control, communication and tri-service co-operation in response to incidents.

4. The SFRS should support effective multi-agency emergency planning and response including contributing fully to the work of Regional Resilience Partnerships (RRPs) in assessing risk, preparing and planning for, responding to and recovering from major and catastrophic incidents and threats. When working with other emergency responders, the SFRS should play a key role in building community resilience and protecting both Scottish and UK critical infrastructure assets.

Partnership

5. Community planning and partnership working with other services and communities should be embedded throughout the SFRS. Building on its existing 'Engagement Strategy', the SFRS should proactively seek collaborative opportunities and innovative ways of working in partnership with other blue light services/key stakeholders to improve outcomes for communities and should ensure effective stakeholder engagement in its approach to all its work including partnership working.

Service Transformation

6. The SFRS should continue to ensure that the benefits of Fire Reform are fully realised, evidenced and tracked, and it should explore through service redesign new and innovative ways in which it can improve the safety and well-being of communities throughout Scotland by building on the traditional roles carried out by the Service.

Modernising Response

7. The SFRS should develop and implement dynamic, innovative and sustainable operating systems throughout Scotland which are fit for purpose and meet local needs (covering both the RDS and whole-time firefighter work patterns).

Unwanted Fire Alarm Signals (UFAS)

8. The SFRS should develop a process for recording the number of blue light journeys made in response to UFAS. The SFRS should also take steps to reduce the overall number of blue light vehicle journeys made in response to UFAS - including identifying the main sources of false alarms, and taking all reasonable and practical steps to reduce their incidence.

Effective Governance and Performance

9. The SFRS should ensure it has an effective approach to performance management to support robust scrutiny of the Service at national and local levels - this approach should be regularly reviewed and evaluated in pursuit of continuous improvement. It should also collect, produce and analyse data and other intelligence to promote the safety and well-being of communities, support operational efficiency and performance improvements (including its partnership contributions) and enable effective public reporting of performance.

People

10. The SFRS should aim to be an employer of choice - maximising the effectiveness of its approach to workforce planning; promoting the safety, health and well-being of all staff; and being a learning organisation with opportunities for all. The SFRS should also seek to be an organisation that is more representative of the people and communities of Scotland that it serves.

Responses

The Scottish Government received **38** responses to the consultation, which were broadly supportive and constructive.

A list of respondents can be found at **Annex A**.

Nine different sectors responded as set out in the table below.

Type of organisation/sector	Number of responses
Fire & Rescue Organisations	2
Individuals	3
Voluntary Sector Organisations	5
Trades Unions	2
Academic	1
Public Bodies	6
NHS Organisations	3
Industry Associations	2
Local Authorities	14
Total	38

The written responses to the consultation document for which the Scottish Government has been given permission to publish have been placed on the Scottish Government website https://consult.scotland.gov.uk/fire-and-rescue/fire-and-rescue-framework/consultation/published_select_respondent .

Findings

Across the range of questions, which cover the entirety of the draft Framework text, there was widespread support for the strategic priorities and the supporting text. Questions 1 – 16 specifically asked whether or not the respondent agreed with, as well as providing an opportunity to comment on, the relevant sections of the Framework. Based on the assumption that a “no comment” response constitutes agreement, then all 16 questions showed at least 89% agreement, with the majority being 94-97%, and some achieving 100% agreement.

There were, however, a number of suggested minor amendments or additions to the drafting of various sections, and some specific concerns expressed. The remainder of this report comprises a more detailed analysis of the comments made in response to each of the 17 questions.

Question 1: Do you agree with the 10 strategic priorities attached in Annex A to the Fire and Rescue Framework for Scotland 2016?

Option	Total	Per cent
Yes	26	68.42%
No	4	10.53%
Not answered	8	21.05%

A total of 30 respondents answered this question. Of those, the majority (26) agreed with the strategic priorities. Four respondents did not agree with the strategic priorities. Of the 8 respondents that did not answer the question, 3 provided comments on the priorities.

All 4 of the respondents that did not agree with the strategic priorities provided further comments. Two, both Fire and Rescue Organisations, supported the majority of the priorities, but expressed concern around priority number 8, on unwanted fire alarms (UFAS), commenting that it was too directive. Both suggested retaining a reworded priority on UFAS that was more strategic. One did not agree with the strategic priorities because they wished to see a new strategic priority introduced around SFRS’s role as a statutory strategic partner in community planning. One did not agree with the priorities because they were concerned that the focus they placed on risk based decision making and resource allocation would lead to front line cuts. Two of these respondents also commented on the relative importance of the priorities, suggesting that there should be some kind of prioritisation, and indicating that it would helpful if clarification could be provided around whether all 10 carried equal importance.

Of the 26 respondents that agreed with the strategic priorities, 21 provided further comments. The 3 respondents who did not answer this question, but provided comment on it, were generally supportive of the priorities, and their comments are incorporated with the comments from respondents who agreed with the question. There was a general consensus that the 10 proposed strategic priorities are appropriate, however the comments included a number of suggested amendments to the priorities and 2 respondents mentioned the order of the priorities.

Priority 8, on unwanted fire alarm signals (UFAS), generated the most discussion. There was general support for the inclusion of a strategic priority on UFAS and a number of comments mentioned the pressure this issue puts on SFRS resources. Only 1 respondent who agreed with the priorities suggested that this priority is not appropriate for the Framework and should be included in SFRS operational or strategic plans.

A number of respondents welcomed the emphasis placed on governance and performance management in Priority 9, although 1 suggested that it could have a greater emphasis on transparency and accountability. Respondents also welcomed the emphasis placed on partnership working, and suggested that the role of SFRS as a statutory partner in Community Planning should be made clear. The importance of local flexibility was raised by several Local Authorities, along with the challenges faced by remote communities. Additional priorities around local accountability; reducing the risk of fire in commercial premises; and the environmental impact of SFRS were also suggested. Some detailed suggestions were made to clarify the wording of individual priorities, including the addition of a reference to Local Resilience Partnerships in priority 4, and these will all be considered as the Framework is finalised.

Question 2: Do you agree with the text set out in the sections Protecting Communities and Prevention and Protection, in Chapter 1 of the Fire and Rescue Framework for Scotland 2016?

Option	Total	Per cent
Yes	29	76.32%
No	2	5.26%
Not answered	7	18.42%

A total of 31 respondents answered this question. Of those, the majority (29) agreed with the sections on Protecting Communities and Prevention and Protection. Two respondents did not agree with the text in these sections. Of the 7 respondents that did not answer the question, 3 provided comments on these sections and as these were generally supportive they are incorporated with the comments from respondents who agreed with the question.

Of the 2 respondents that did not agree with the text in these sections, 1 provided no further comment and 1 suggested a slight rewording of part of the Prevention and Protection section to indicate how reducing the number of fires in commercial premises contributes to the economy.

Of the 29 respondents that agreed with these sections, 25 provided further comments. A number of respondents welcomed the clear focus on prevention work and partnership working, targeted at the most vulnerable. Comments highlighted the need for partnership working to be a joint approach, not one which was led by one particular partner, and suggested that the Framework could put a stronger emphasis on the importance of all partners coming together to share information in a coordinated way to ensure the more vulnerable people in communities are identified and protected. The absence of any mention of SFRS's role as a Corporate Parent to all looked after children and care leavers was also raised.

Comments also focused on the importance of local flexibility, and the ability to tailor response and prevention activity to local needs. Several respondents welcomed the mention of integrated safety campaigns. A few respondents commented on fire safety in non-domestic premises and SFRS's fire safety enforcement role – some were content with the text and others suggested changes, including the addition of narrative around the need to improve the quality of fire risk assessments in commercial premises and the need to review policies where non-productive, resource intensive activities are undertaken (such as response to UFAS). Comments also referred to SFRS's role in preventing wildfires, fire-related anti-social behaviour, SFRS's role in the Scottish Government-led Building Safer Communities Programme, and caution around the level of influence SFRS can exercise in areas which lie out with its direct control

Question 3: Do you agree with the text set out in the section, Responding to Incidents, in Chapter 1 of the Fire and Rescue Framework for Scotland 2016?

Option	Total	Per cent
Yes	27	71.05%
No	2	5.26%
Not answered	9	23.68%

A total of 29 respondents answered this question. Of those, the majority (27) agreed with the section on Responding to Incidents. Two respondents did not agree with the text in this section. Of the 9 respondents that did not answer the question, 1 commented on the section on Responding to Incidents – because this was supportive it is incorporated with the comments from respondents who agreed with the question.

Of the 2 respondents that did not agree with the text in this section, neither provided any comments to indicate why they did not agree with the text.

Of the 27 respondents that agreed with the section on Responding to Incidents, 19 provided further comments. Comments generally welcomed the text and the reassurance around community safety that an effective emergency response offers. Several respondents identified the need for flexibility in response to address local needs, the importance of local risk management planning when allocating resources and the importance of the Retained Duty System (RDS). Several respondents highlighted aspects of SFRS's response that were not captured sufficiently in this section, such as preparation for extreme weather other than floods (for example snow and prolonged dry periods), the crucial role that SFRS plays in relation to support and building community resilience around civil contingencies, and the threat from terrorism and the need for an effective response. One respondent felt that there was too little emphasis in this section on the importance of having accurate, up to date and reliable operational intelligence available to crews at incidents, and the need to ensure that SFRS IT systems and equipment on appliances facilitate this, whilst another response highlighted the need for greater sharing of data.

Question 4: Do you agree with the text set out in the section Managing Risk, in Chapter 1 of the Fire and Rescue Framework for Scotland 2016?

Option	Total	Per cent
Yes	28	73.68%
No	1	2.63%
Not answered	9	23.68%

A total of 29 respondents answered this question. Of those, the majority (28) agreed with the section on Managing Risk. One respondent did not agree with the text in this section. Of the 9 respondents that did not answer the question, 3 provided comments on the section on Managing Risk – as these were generally supportive they are incorporated with the comments from respondents who agreed with the question.

The 1 respondent that did not agree with the text in this section provided no comments to indicate why they did not agree with the text.

Of the 28 respondents that agreed with the text on Managing Risk, 21 provided further, often substantive, comments. Overall, respondents welcomed the importance placed on risk management and data sharing, and highlighted the need for partnership working, especially at local level, to facilitate this. A small number of respondents highlighted the need for risk assessments and resource allocation to take into account the needs of rural and island communities, whilst 3 respondents highlighted that this section of the Framework made no mention of Local Resilience Partnerships, and another suggested that the role of local partnership working could be made more prominent.

A few respondents mentioned the targeting of resources based on risk, highlighting alignment of Local Plans and home fire safety visits. One respondent suggested that the section be renamed 'Identifying and Managing Risk' and that the Framework should ask SFRS to publish analysis of its strategic risk assessment. A range of other issues were also identified by respondents, including the lack of any reference to commercial premises or the insurance industry, the need for SFRS to consider risk in relation to its assets, and suggested amendments to highlight the importance of passing information on to health sector workers and the dissemination of SFRS risk tolerance levels.

Question 5: Do you agree with the text set out in the section Evidence Based Decision Making, in Chapter 1 of the Fire and Rescue Framework for Scotland 2016?

Option	Total	Per cent
Yes	27	71.05%
No	2	5.26%
Not answered	9	23.68%

A total of 29 respondents answered this question. Of those, the majority (27) agreed with the section on Evidence Based Decision Making. Two respondents did not agree with the text in this section. Of the 9 respondents that did not answer the

question, 3 provided comments on this section - as these were generally supportive they are incorporated with the comments from respondents who agreed with the question.

Of the 2 respondents that did not agree with the text in this section, 1 provided no comments to indicate why they did not agree with the text, and 1 suggested that the section around SFRS obtaining National Statistics Accreditation be redrafted slightly.

Of the 27 respondents that agreed with the section on Evidence Based Decision Making, 14 provided further comments. They welcomed the section, and especially the approach of sharing information with partners – although the phrase ‘common sense approach to interagency data and information sharing’ received a mixed reaction; 2 respondents specifically highlighted their support for it whilst another felt that this sentence was weak, and that the wording should assume that data would be freely shared. A few respondents highlighted the need for statistics to be shared effectively at a local level. Several respondents highlighted the importance of data collection by SFRS, and the benefit of this to partners, in scrutinising performance, for decision making and for operational purposes. Specific drafting suggestions were made about the addition of text which placed emphasis on working with partners to develop a joint strategic analysis of needs, and in relation to HMFSI recommendations.

Question 6: Do you agree with the text set out in the section Working with Others, in Chapter 1 of the Fire and Rescue Framework for Scotland 2016?

Option	Total	Per cent
Yes	29	76.32%
No	1	2.63%
Not answered	8	21.05%

A total of 30 respondents answered this question. Of those, the majority (29) agreed with the section on Working With Others. One respondent did not agree with the text in this section. Of the 8 respondents that did not answer the question, 3 provided comments on this section - they are incorporated with the comments from respondents who agreed with the question.

The 1 respondent that did not agree with the text in this section provided no comments to indicate why they did not agree with the text.

Of the 29 respondents that agreed with the text on Working with Others, 22 provided further comments. A number of respondents who welcomed the emphasis on effective partnership working referred to positive links they already had with SFRS. Several respondents commented on SFRS’s role as a statutory community planning partner under the Community Empowerment (Scotland) Act 2015 – whilst respondents were pleased to see mention of this role, some felt that the text could better explore SFRS’s duties under the 2015 Act, and that references to Local Outcome Improvement Plans and Locality Plans should be added to this section. The trusted role SFRS has within communities, and the need to maintain a clear and separate identity to allow this to continue, was also mentioned.

Comments also welcomed the inclusion of text setting out that SFRS should continue its involvement in the Scottish Government’s Building Safer Communities Programme, but pointed out that the web link given no longer worked. Two respondents welcomed the text on sharing of premises with partners, with one of them suggesting the text could indicate which of the 3 emergency services should take the lead on this issue. One respondent queried whether ‘local scrutiny board’ was the correct term to describe the formal mechanisms that provide fire and rescue scrutiny at Local Authority level.

Other changes suggested included: adding a reference to SFRS’s role as a corporate parent under the Children and Young People (Scotland) Act 2014; clarifying that SFRS’s key partners were not always public bodies – for example, in the case of wildfires land managers were important partners; and making the role of working with others in non-emergency situations more explicit.

Question 7: Do you agree with the text set out in the section Local Flexibility, in Chapter 1 of the Fire and Rescue Framework for Scotland 2016?

Option	Total	Per cent
Yes	28	73.68%
No	1	2.63%
Not answered	9	23.68%

A total of 29 respondents answered this question. Of those, the majority (28) agreed with the section on Local Flexibility. One respondent did not agree with the text in this section. Of the 9 respondents that did not answer the question, 1 provided comments on this section- and they are incorporated with the comments from respondents who agreed with the question.

The 1 respondent, a Local Authority, who did not agree with the text in this section, commented that an additional strategic priority should be added which recognised SFRS’s role as a statutory strategic partner in community planning.

Of the 28 respondents that agreed with the section on Local Flexibility, 19 provided further comments. Comments supported the need for local flexibility to allow SFRS to provide local solutions to local priorities, highlighting the difference between the needs of rural and urban areas. Respondents also welcomed the importance of partnership working, especially the recognition of the relationship between SFRS and Local Authorities. The importance of the Local Senior Officer role was highlighted, as was the need for SFRS’s Local Plans to ‘provide the opportunity to ensure that local priorities continue to be reflected in operational delivery’. A couple of respondents highlighted the need for local accountability, and suggested that the section should refer to Locality Outcome Improvement Plans under the Community Empowerment (Scotland) Act 2015.

Question 8: Do you agree with the text set out in the section Driving Improvement and Realising the Benefits of Fire Reform, in Chapter 2 of the Fire and Rescue Framework for Scotland 2016?

Option	Total	Per cent
Yes	27	71.05%
No	2	5.26%
Not answered	9	23.68%

A total of 29 respondents answered this question. Of those, the majority (27) agreed with the section on Driving Improvement and Realising the Benefits of Fire Reform. Two respondents did not agree with the text in this section. Of the 9 respondents that did not answer the question, none provided comments on this section.

Of the 2 respondents that did not agree with the text in this section, one gave no further detail on their reasons for disagreeing and the other felt that the Transformation Programme should be renamed Integration or Consolidation Programme, since transformation can only begin when integration is complete.

Of the 27 respondents that agreed with the text in the section on Driving Improvement and Realising the Benefits of Fire Reform, 9 provided further comments. These comments supported the outcome based approach, and SFRS's continued commitment to its Transformation Programme. One respondent stressed the need for benefits realisation to be used as part of the rationale for policy direction/investment, rather than just as a stand-alone project.

Question 9: Do you agree with the text set out in the section The Future Role of the Fire-fighter: Productive use of Capacity, in Chapter 2 of the Fire and Rescue Framework for Scotland 2016?

Option	Total	Per cent
Yes	27	71.05%
No	2	5.26%
Not answered	9	23.68%

A total of 29 respondents answered this question. Of those, the majority (27) agreed with the section on The Future Role of the Fire-fighter: Productive use of Capacity. Two respondents did not agree with the text in this section. Of the 9 respondents that did not answer the question, 2 provided comments on this section - they are incorporated with the comments from respondents who agreed with the question.

Of the 2 respondents that did not agree with the text in this section, one disagreed strongly with the assumption that a reduction in the number of fires has resulted in equivalent spare capacity within the Service, highlighting the increased demands of additional functions and specialist rescue and the training this required. The other respondent suggested that the section should include a reference to the integration of health and social care.

Of the 27 respondents that agreed with the text in the section on The Future Role of the Fire-fighter: Productive use of Capacity, 20 provided further comments which

recognised the benefit to communities of this approach. Comments offered support for developing the role of the fire fighter through a flexible workforce, and optimising capacity by the widening of the role through new and innovative practices, with one respondent saying that it offered ‘smart and well thought through commentary on the importance of on-going transformation and the need to build on traditional roles’. Several respondents offered comments supporting the wider use of Community Fire Stations.

A few respondents mentioned the needs of rural areas, recognising that building community capacity was key and that this approach might be particularly beneficial to rural areas. One respondent felt that any evolution of the role of fire fighters needed to take into account the unique circumstances of RDS fire fighters. Several respondents offered comments around the importance of working with others on a collaborative basis, with one suggesting that other organisations, not just SFRS, work to overcome difficulties in partnership working. A couple of respondents focused on SFRS’s prevention work, offering support for widening the remit of home fire safety visits to include home safety interventions, and for considering how SFRS can help identify harm being caused to children. Other comments mentioned the implications on the workload of station based managers of extending the role of fire fighters, and highlighted the importance of SFRS working with representative bodies/unions, COSLA and local communities over any changes.

Suggested changes to the text included adding a reference to non-tangible assets (such as relationship with public) as well as tangible assets; adding a reference to maintaining a footprint across Scotland; and including a commitment to examining how barriers between services can be softened to achieve effective preventative spend and savings. One respondent felt that the OHCA section was too detailed for the Framework.

Question 10: Do you agree with the text set out in the section, Modernising Emergency Response, in Chapter 2 of the Fire and Rescue Framework for Scotland 2016?

Option	Total	Per cent
Yes	26	68.42%
No	2	5.26%
Not answered	10	26.32%

A total of 28 respondents answered this question. Of those, the majority (26) agreed with the section on Modernising Emergency Response. Two respondents did not agree with the text in this section. Of the 10 respondents that did not answer the question, 2 provided comments on this section- they are incorporated with the comments from respondents who agreed with the question.

Of the 2 respondents that did not agree with the text in this section, one gave no further detail on their reasons for disagreeing and the other suggested that the text referring to changes to the retained or volunteer services should be amended to reflect that any changes must offer improved outcomes to the communities of Scotland.

Of the 26 respondents that agreed with the text in the section on Modernising Emergency Response, 14 provided further comments. The majority of comments focused on the retained (RDS) and volunteer services (VS), with respondents welcoming the recognition, in the Framework, of their importance and the challenges facing them, and the commitment to engage with local communities on any proposed changes. Several respondents welcomed SFRS providing training for RDS/VS tailored to local risk and geography, which was also proportionate and undertaken locally, with one suggesting the wording be strengthened to reflect that SFRS must consider this. A couple of respondents highlighted the specific challenges facing rural areas.

A range of other comments were made; including offering support for the risk based deployment of staff and resources, agreeing that any crewing model must have fire fighter and community safety at its core; offering support for maintaining fire fighter numbers; and highlighting the importance of SFRS working with representative bodies/unions over any changes.

Question 11: Do you agree with the text set out in the section Telecommunications Systems: Current and Future Use, in Chapter 2 of the Fire and Rescue Framework for Scotland 2016?

Option	Total	Per cent
Yes	28	73.68%
No	0	0%
Not answered	10	26.32%

A total of 28 respondents answered this question. All 28 agreed with the section on Telecommunications Systems: Current and Future Use. Of the 10 respondents that did not answer the question, 1 provided comments on this section - they are incorporated with the comments from respondents who agreed with the question.

Of the 28 respondents that agreed with the text in the section on Telecommunications Systems: Current and Future Use, 8 provided further comments.

Respondents welcomed the contents of this section, highlighting the importance of ensuring communication links are maintained – one respondent stressed the importance of ensuring that telecommunications and mobile technology communications infrastructure are in place in remoter areas in Scotland. The UK-wide approach was welcomed, as was the commitment to ensuring Scotland-specific issues are considered. Other comments suggested that the system should be able to identify the source of the call; that the main driver for development of new systems must be enhanced fire fighter and public safety; and that consideration should be given to how communications systems might facilitate communication between SFRS and others involved in incident response.

Question 12: Do you agree with the text set out in the section Unwanted Fire Alarm Signals, in Chapter 2 of the Fire and Rescue Framework for Scotland 2016?

Option	Total	Per cent
Yes	24	63.15%
No	3	7.89%
Not answered	11	28.95%

A total of 27 respondents answered this question. Of those, the majority (24) agreed with the section on Unwanted Fire Alarm Signals. Three respondents did not agree with the text in this section. Of the 11 respondents that did not answer the question, 2 provided comments on this section - both comments were supportive of this section and they are incorporated with the comments from respondents who agreed with the question.

Of the 3 respondents that did not agree with the text in this section, comments revealed mixed reasons for disagreement. One respondent felt that this section would be more appropriate for SFRS strategic/operational plans than a national framework. The other 2 respondents supported the inclusion of this section, but one felt that the strategic objective linked to this section was too detailed, and the other felt that the text should set out a requirement for SFRS to set a target for reducing the number of UFAS and blue light journeys made in response to UFAS. Other suggestions covered expanding the text to make clear that the approach adopted by SFRS does not compromise public or fire fighter safety, and that the number of UFAS that result in fires should be mentioned.

Of the 24 respondents that agreed with the text in the section on Unwanted Fire Alarm Signals, 12 provided further comments. These comments supported the focus placed on addressing the issue of UFAS – one respondent referred to the burden UFAS places on the Service as being an ‘extremely wasteful demand’. Comments raised the financial costs of responding to UFAS, and highlighting this as an area of interest to Local Authorities. The proposals to work in partnership with those who use, manage, install and maintain automatic fire alarm systems, and the reduction of unnecessary blue light journeys were welcomed. Comments also made some suggestions for improving the text, including adding an explicit reference to those involved in the design of automatic fire alarm systems. One respondent suggested that the Scottish Government consider issuing guidance to the public sector (such as the NHS) on the issue.

Question 13: Do you agree with the text set out in the section Managing Performance, in Chapter 3 of the Fire and Rescue Framework for Scotland 2016?

Option	Total	Per cent
Yes	29	76.32%
No	1	2.63%
Not answered	8	21.05%

A total of 30 respondents answered this question. Of those, the majority (29) agreed with the section on Managing Performance. One respondent did not agree with the text in this section. Of the 8 respondents that did not answer the question, 1 provided comment on this section - this comment is incorporated with the comments from respondents who agreed with the question.

The 1 respondent that did not agree with this section offered no comment as to why they did not agree.

Of the 29 respondents that agreed with the text in the section on Managing Performance 16 provided further comments. Respondents welcomed the focus on a robust performance management system, at both a national and local level. Several respondents commented on the importance of local reporting/accountability, with a couple suggesting that a greater emphasis on this in the Framework would be helpful. Respondents suggested that performance management should also take into account the duties placed on SFRS as a public body and SFRS's contribution to the outcomes of a wider group of partnership agencies. A couple of respondents queried whether the references to SFRS in this section relate to the Board or to Management, and suggested that the role of the Board in ensuring good governance should be brought out more strongly.

One respondent indicated that they were happy for targets to appear elsewhere other than in the Framework. A few respondents suggested that the text should be amended to highlight that transparency and engagement are integral to governance and performance management, and that SFRS need to carry out genuine self-assessment.

Question 14: Do you agree with the text set out in the section Developing Capacity, in Chapter 3 of the Fire and Rescue Framework for Scotland 2016?

Option	Total	Per cent
Yes	28	73.68%
No	1	2.63%
Not answered	9	23.68%

A total of 29 respondents answered this question. Of those, the majority (28) agreed with the section on Developing Capacity. One respondent did not agree with the text in this section. Of the 9 respondents that did not answer the question, none commented on this section.

The 1 respondent that did not agree with this section offered no comment on why they did not agree.

Of the 28 respondents that agreed with the text in the section on Developing Capacity, 12 provided further comments. Comments offered support for the contents of this section, and its positive approach to developing workforce capacity. A few respondents highlighted the importance of the health and wellbeing of the workforce. One respondent queried whether the phrase 'an employer of choice' was meaningful to the public, whilst another commented that SFRS need to adopt greater flexibility in relation to training and recruitment criteria assessment to ensure adequate

resources in rural areas. One respondent commented that the Framework should recognise the importance, and challenge, of SFRS’s succession planning in relation to senior officer posts, as well as to SFRS Board membership. Respondents also suggested adding a reference to staffing numbers and location, with changes being discussed and consulted locally; flagged the importance of ensuring SFRS staff received appropriate pay and reward; and highlighted the opportunities that the Developing Young Workforce agenda offers for SFRS to develop relationships with schools and colleges to attract young recruits.

Question 15: Do you agree with the text set out in the section Equalities and Human Rights, in Chapter 3 of the Fire and Rescue Framework for Scotland 2016?

Option	Total	Per cent
Yes	30	78.95%
No	0	0%
Not answered	8	21.05%

A total of 30 respondents answered this question. Of those, all agreed with the section on Equalities and Human Rights. Of the 8 respondents that did not answer the question, none commented on this section.

Of the 30 respondents that agreed with the text in the section on Equalities and Human Rights, 16 provided further comments. The comments welcomed the focus on equalities and human rights, the aim of mainstreaming them across SFRS, and the recognition of SFRS as an employer as well as a service provider in relation to equalities issues. A few respondents commented on gender balance, welcoming the Framework’s commitment to Board diversity, and to achieving a more gender-balanced operational workforce, whilst recognising the challenges facing SFRS in doing so. The commitment to equal pay and the Living Wage, and encouraging uptake of Modern Apprentices were also welcomed. One respondent questioned whether SFRS employ sufficient specialist staff to ensure policies and procedures are fully inclusive.

In terms of suggested changes to this section, one respondent suggested that a reference should be added to the Framework covering SFRS's duties in relation to its role as a corporate parent under the Children and Young People (Scotland) Act 2014, as well as how SFRS plan to implement their duty to report under Part 1 of the UN Convention on the Rights of the Child. Another respondent suggested a reference could be added in this section to potential links to the Scottish National Plan for Human Rights, and steps the SFRS may be taking towards embedding a better human rights culture across the organisation. This section of the Framework covers the issue of succession planning for the SFRS Board – a couple of comments made in response to other questions suggested the addition of a reference to the challenges of, and need for, succession planning in relation to SFRS staff at all levels, and especially those at executive level, to address the risks associated with loss of leadership and experience.

Question 16: Do you agree with the text set out in the section Community Empowerment and Community Planning in Chapter 3 of the Fire and Rescue Framework for Scotland 2016?

Option	Total	Per cent
Yes	22	57.89%
No	0	0%
Not answered	16	42.11%

A total of 22 respondents answered this question, and all agreed with the section on Community Empowerment and Community Planning. Of the 16 respondents that did not answer the question, 2 commented on this section, and these comments have been incorporated with those who agreed with the question.

Of the 22 respondents that agreed with the text in the section on Community Empowerment and Community Planning, 15 provided further comments. Respondents welcomed the inclusion of this section, which recognises SFRS's role as a key partner within community planning, and their duties under the Community Empowerment (Scotland) Act 2015. This was felt to be important given the increasing focus on prevention and community involvement. A few Local Authority respondents suggested that there should be more clarification in the Framework of SFRS's duties under the Community Empowerment (Scotland) Act 2015, under its role as a statutory partner. A couple of respondents commented on SFRS's approach to its role as a Community Planning Partner, with one commenting that SFRS need to consider how it will respond, and another commenting that SFRS need to become a more visible Community Planning Partner.

A range of other comments were made, including a handful of respondents who commented on the role of local communities and the importance of involving them in decision making. One respondent asked for the inclusion of a paragraph covering scrutiny arrangements that puts onus on SFRS to work with Local Authorities to develop a system of local scrutiny that does not see fire and police being held to account in isolation for traditional fire and police performance measures. Another respondent expressed concern that SFRS funding is not offset against its contribution to society or cost savings delivered by its activity. A couple of Local Authority respondents also suggested that SFRS's role as a Community Justice Partner should be added to this section of the Framework.

QUESTION 17: Annex B includes the 2013 Framework Targets and we would like to hear your views on whether these should be kept, dropped or amended. We would also like to hear if you think that any new targets should be added for example reduction of unwanted fire alarm signals or how better to measure the economic impact of non-domestic fires?

Option	Total	Per cent
Comments	28	73.58 %
Not answered	10	26.32%

A total of 28 respondents commented under this question. Four of these comments did not relate to the targets and are not included in the summary below. Of the 24

respondents that commented specifically on the targets 14 broadly indicated that they supported all of them – 4 as they were, and 10 with amendments. The other respondents commented only on specific targets. No respondent indicated that they were unhappy with all the targets, although 2 respondents suggested that the current targets are inadequate and have little scientific basis, with 1 advising that targets and measures would be best included in SFRS’s strategic and operational plans.

Fourteen respondents made supportive comments around the current targets, but a number mentioned the difficulty around setting targets for areas where SFRS works in partnership and is not in full control of prevention activities or outcomes. A few respondents also commented on the existing targets around fire casualties and accidental dwelling fires, with mixed views on whether the percentage reduction should be increased, based on a 3 or 5 year rolling average, or removed and replaced by a target to reduce the rate without any figure attached to it.

Eight respondents proposed that a target be set specifically around UFAS.

One respondent suggested a requirement for SFRS to publish availability statistics for stations and track performance on the availability of RDS crews during the daytime. A target around the availability of RDS crews was proposed by two Local Authority respondents.

Four respondents suggested some kind of target or measurement around the economic impact of non-domestic fires, and there was a suggestion that non-domestic fire impact can be measured from a Loss Control perspective: e.g. loss of production/capability, loss of capital value, consequential loss, reputation loss impact, environmental impact, future growth loss, social impact (job loss). There was also a suggestion of engagement with the insurance industry to collaborate on a measurement of SFRS operational effectiveness in both domestic and non-domestic fires, as although the number of fires is reducing, the cost of fire has increased.

One respondent mentioned the requirement for a better measure of SFRS’s flood performance, but added that a target for SFRS around flood rescue and evacuation would be complicated because of the involvement and responsibilities of other agencies.

Additional targets proposed included:

- Equality – some kind of target around reducing dwelling fires, casualties and fatalities in the most deprived areas;
- Reducing unintentional injury – a target that would reflect SFRS’s work around the aims of the Building Safer Communities Programme Phase 2, possibly around accidents in the home;
- Wildfire engagement/mobilisation – a target around engagement and mobilisation, though the respondent points out the difficulties of setting an achievable target around a reduction in incidents or scale, as this is very much influenced by weather;
- Response times – the setting of target times for responding to incidents; and
- A request for local targets to be included in SFRS Local Plans as well as a suggestion that indicators to be reported at local authority level should be evaluated to ensure that they are meaningful.

NEXT STEPS

We would like to thank all respondents for taking the time to respond to this consultation. In light of the comments received, the Framework will be amended in a number of areas. The amended Fire and Rescue Framework for Scotland 2016 will be published on the Scottish Government website, and introduced to Parliament in September 2016. The Framework will be brought into effect in October by Parliamentary Order. The Framework will not include targets – instead SFRS will develop targets to support its Strategic Plan, and the comments provided on the targets during this consultation will be used to inform discussions with the SFRS as they are developed.

Scottish Government
Fire and Rescue Unit: Safer Communities Division
August 2016

List of consultation respondents

Fire & Rescue Organisations

- Scottish Fire and Rescue Service Board
- Scottish Fire and Rescue Service Senior Leadership Team

Individuals

- Three individuals responded to the consultation

Voluntary Sector Organisations

- Absafe
- CELCIS (Centre for Excellence for Looked After Children in Scotland)
- The Royal Society for the Prevention of Accidents (RoSPA)
- Safe Glasgow Group
- Scottish Council on Deafness

Trades Unions

- Fire Brigades Union
- The Fire Officers' Association

Academic

- Joint Universities Emergency Services Research Programme

Public Bodies

- Care Inspectorate
- Commissioner for Ethical Standards in Public Life in Scotland
- Scottish Information Commissioner
- Scottish Environment Protection Agency (SEPA)
- Scottish Natural Heritage
- Scottish Water

NHS Organisations

- NHS Ayrshire and Arran
- NHS Grampian
- Scottish Ambulance Service

Industry Associations

- BAFE (British Approvals for Fire Equipment)
- Institution of Fire Engineers, Scottish Branch

Local Authorities

- | | |
|---------------------------------|-----------------------------|
| • Aberdeen City Council | • Highland Council |
| • Aberdeenshire Council | • Orkney Islands Council |
| • Comhairle nan Eilean Siar | • Perth & Kinross Council |
| • COSLA | • Renfrewshire Council |
| • Dumfries and Galloway Council | • Scottish Borders Council |
| • East Ayrshire Council | • South Lanarkshire Council |
| • East Renfrewshire Council | • West Lothian Council |



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