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Gofynner am/Please ask for:

Councillor B Hall

30 January 2006

Ms Julia Letton
Fire and Rescue Services Branch
Welsh Assembly Government
Cathays Park
Cardiff
CF10 3NQ

Dear Julia

Risk Reduction Planning Guidance for Fire and Rescue Authorities and Service Standards for Attendance to Fires in the Home

The Authority warmly welcomes the opportunity to comment on the above documents, which it considers are a crucial element in planning effective and flexible services to drive down Community Risk.

Since these documents relate to Welsh guidance on the production of Integrated Risk Management Plans (now called Risk Reduction Plans) and Service Standards for attendance to fires in the home, both of which are inextricably linked, this response covers both consultation documents together.

Whilst the Authority recognises that it is important that the guidance is finalised extremely quickly to enable sufficient time for risk reduction plans to be prepared for consultation by the early summer of 2006, a 4 week turn around time for responses to the consultation has been problematic. This is in terms of preparing a detailed response and fitting this into the Authority and Fire and Rescue meeting structure. WAG is asked to consider the practical difficulties of such important consultation exercises in the future.

The Authority understands that the Chief Fire Officer, Deputy Chief Fire Officer and other senior officers have been involved in some elements of the development work of both documents and as such, there are few surprises.

The documents are a fair representation of discussions held with WAG and comments submitted during the course of development.

Overall, the Authority broadly welcomes the guidance contained within both consultation documents but makes the following detailed observations:

Foreword

It is extremely pleasing that the Minister, within her opening remarks, fully recognises that Fire and Rescue Authorities need to manage a complex environment where they may have many competing demands on their resources. There is further recognition that Fire and Rescue Authorities need the freedom to develop innovative solutions in order to manage and reduce risk, whilst taking account of views of communities. The Authority believes that the draft Risk Reduction Planning (RRP) guidance produced for Wales will facilitate this important process.

Introduction Section

The Authority is extremely pleased that for the purposes of clarity, the WAG guidance replaces the previous guidance and policy on Integrated Risk Management Planning developed by ODPM and in use in England in its entirety.

The opportunity has been taken to “re-badge” the process as Risk Reduction Planning, which is an appropriate and important change in terminology. The aim is also to bring together all aspects of community and corporate risk into a single risk-planning framework, an aspect that was never clear in the English guidance. However, whilst corporate risk such as business continuity planning is mentioned a number of times there is no detail within the guidance produced. All of the detailed guidance relates to Community Risk and the tailoring of services/resources to drive down that risk. The Authority would prefer to see corporate matters dealt with as a separate issue or subject to more detailed guidance within the RRP framework.

The Risk Management Framework

During the course of development of the WAG guidance, the Authority has placed considerable emphasis on the need for such guidance to be closely linked to the WAG vision and agenda for public services in Wales.

It is pleasing that this has been incorporated and there is a clear requirement on FRA's to integrate their activities within the agendas set by WAG. Key examples of this are:

- 1) Making the Connections – Delivering better services for Wales
- 2) Delivering the Connections – From Vision to Action
- 3) Wales a better community – Community focus.

By linking the guidance to these agendas, the Welsh Fire and Rescue framework, the work of the CFS advisory committees, Wales Programme for Improvement, Wales Service Standards and other business strands, the WAG Risk Reduction guidance has been able to develop in a truly Welsh context rather than being a hybrid of the English system.

It is also extremely pleasing to see that the guidance places strong emphasis on any risk assessment/risk management approach and subsequent implementation of any risk control measures as being validated, transparent and able to stand scrutiny. It has always been an absolute requirement of this Authority in both IRMP 1 and 2 in

that every decision made has always been backed up by comprehensive validated evidence. There is also a requirement to embed risk management within all aspects of managerial decision making and being linked to corporate objectives, something done in Mid and West Wales for the last few years.

Again, the comment is made within this section about the lack of detail in relation to corporate risk with focus only being given towards Community Risk.

Principles of a Risk Reduction Plan

Within the introductory part of this section of the RRP guidance, reference is made to the death and injury reduction targets detailed within the FRS framework for Wales. The wording of the targets aspects within the RRP guidance is not consistent with that in the framework since there does not appear to be the same level of recognition that the FRS is not the lead agency in reducing overall deaths and injuries in road traffic collisions. The FRS is a key **partner** and this aspect is covered much more effectively in the framework document.

In a similar way to that in England, the WAG framework makes it absolutely clear that the responsibility for the production of the risk reduction plan lies with the Authority. The Fire and Rescue Service will be responsible for the implementation of the plan. What is not clear in the guidance however, is how the Assembly Government might use its powers under the 2004 Act to intervene if it believes the Risk Reduction Planning process followed by an individual Authority is not robust or appropriate. The Authority also questions how would this decision be made.

The Authority is pleased that Risk Reduction Plans, which detail the overall community risk assessment, will, as before under the English guidance, be supported by annual action plans. The Authority's structure involving the use of the member working groups in conjunction with the Director of Service Policy and Planning is well placed to produce and drive implementation of Risk Reduction plans in this and future years.

The guidance is explicit in its requirement that RRP's should be in place by 31st October ready for implementation in the following April. This will ensure full integration with the business and budget planning cycles. It is not clear however if this is every year, particularly given that WPI fire is not now expected until autumn 2006, not April 2006 as anticipated.

This will of course mean that work will need to commence shortly on the 2007/08 RRP, since a full community risk assessment under the terms of the new guidance is required. The early finalisation of the guidance is therefore crucial.

The Authority notes further significant differences in the WAG guidance over the ODPM guidance in respect of the preparation of the RRP as follows:

- 1) There is a requirement to consult with stakeholders **during the course** of preparation of the RRP. The Authority accepts that this is necessary but only if appropriate. This will be difficult to achieve particularly in relation to external stakeholders and the public.
- 2) FRA's must clearly demonstrate that they have considered responses from consultation. Whilst this can of course be demonstrated (and has been in the past) it is not always appropriate to action these comments.

- 3) A clear requirement to monitor and review existing plans to ensure past IRMP decisions were the correct ones, and are delivering as intended. This is done as part of ongoing managerial good practice but the Authority welcomes the fact that it is now included as a specific requirement within the RRP process.

Finally, the section relating to the objectives of Risk Reduction planning is not consistent with the intention to focus on Corporate as well as Community Risk

Service Standards

The Authority welcomed the fact that the former prescriptive standards of fire cover were repealed on the introduction of the IRMP process in 2003/04. Since that time, some FRA's in England have set their own attendance standards, whilst most others, including Mid and West Wales have operated broadly in accordance with the former 1985 standards.

The Authority notes that a technical working group was set up to investigate the development of service standards and that this group included the 3 Welsh CFO's, WAG officials, Representative Bodies and officers from all 3 FRS. The work was extremely complex and will require further development in the future. Initially, the service standards have been set for fires in the home, focusing on life risk and this move to life risk standards development is welcomed.

The Authority is however concerned that the detail of a service standard is included within the draft RRP guidance at a time when the framework for such standards is still undergoing a period of consultation.

The WAG FRS service standard for fires in the home is that 80% of the **population** in Wales will receive an attendance to a fire in their home within 10 minutes. It was always the Authority's understanding that the standard would apply to **households** not population, which are clearly different things. Furthermore, the Authority requests clarification on how this standard can be measured since it is framed currently on an all Wales basis.

It is also stated within the standard that in high-predicted casualty rate areas, which will be determined by the Fire Service Emergency Cover (FSEC) model the response time should be 5 minutes. The Authority understanding was that this would apply only to the **very** high-risk category as defined by FSEC.

Areas which exist outside the standard such as the more remote areas of Wales will be risk assessed using the FSEC model to assess individual risk areas and where necessary the FRS will implement additional appropriate forms of risk reduction. The Authority welcomes this approach which will lead to a more effective use of resources.

Whilst this standard is not perfect, the Authority in principle believes it to be a pragmatic conclusion to this issue. The use of such a standard will be an assurance to the public as to the level of service that people in Wales can expect in relation to the general speed of operational response, whilst at the same time, retaining the flexibility and non-prescription the Authority needs to deploy resources in a flexible and appropriate manner.

Education and Prevention

The Authority is concerned that whilst the guidance reflects the need to engage in the work of the Wales Fire and Rescue Service Advisory Group and the Community Fire Safety Committee in its RRP processes, this section of the guidance is somewhat lacking.

The Mid and West Wales Fire & Rescue Authority is using the RRP process as the principle vehicle to move the emphasis of service provision from a service which responds to one that prevents yet education and prevention receives only 3 paragraphs in a 24 page document.

The work of Firebrake, the Arson Reduction teams, youth work etc, should be included. The Service is quite rightly moving rapidly into more emphasis on education and prevention and the RRP guidance should be more reflective of this.

Furthermore, there is little mention of the changes to Fire Safety legislation and the application of risk based enforcement.

Evidence based Development

As has been mentioned earlier, the guidance places heavy emphasis on the need for robust evidence to support risk reduction measures. This is something which is an integral part of the Mid and West Wales approach to risk planning and is welcomed. The sections relating to what is and what is not robust evidence are unnecessary detail in what needs to be a strategic framework document.

The guidance states that, whilst not the only risk modelling tool available, FSEC is the preferred tool of WAG, to gather and interpret evidence to inform the development of proposals within the RRP. This is most pleasing given the investment in FSEC the Authority has made. FSEC is now sufficiently developed to produce robust risk modelling scenarios for the development of community risk profiles and maps.

Integration of RRP and Risk Management within the wider public services agenda in Wales.

WAG has established strategic agendas for public services in Wales and places clear requirements on individual FRA's to play their part in these by way of the RRP process. The Authority is pleased that this integration is included within the RRP guidance and builds upon an approach already well developed in MWW.

Wales Programme for Improvement (WPI)

There is clear synergy between RRP and WPI but the relationship each has with the other is still to be finalised. WPI – fire was expected in April 2006 but it appears that it will not now be until Autumn 2006, so the two processes will remain totally separate until further WPI – fire guidance is published.

The Authority is more than a little concerned in relation to this delay since it will be absolutely crucial to have the two processes properly linked and implemented at the correct point in the corporate planning calendar. An autumn 2006 WPI commencement will be too late to inform the 2007/08 RRP.

Consultation and participation in the development of RRP

The Authority finds some aspects of this section of the guidance somewhat patronising. The guidance indicates WAG minimum expectation in terms of who must be consulted in the RRP, none of which causes any difficulty and forms part of the Authority's existing consultation strategies in any case.

What does cause concern is that the guidance appears to suggest that consultation and participation should take place through all stages of proposal development. This might be appropriate/possible on some but not all aspects.

Finally, the guidance is explicit in its requirement for formal consultation with WAG by way of the Wales Fire and Rescue Services Liaison Group before the commencement of public consultation. This is as expected since this requirement is detailed within the FRS framework. However, there must be a realisation that this will increase the period of time required to undertake the overall consultation phase of the RRP development.

The guidance on RRP and Service standards is in principle welcomed, and with a few notable exceptions, is a broadly similar process to that which has been in place (and used by MWW) since 2003/2004.

There are no major surprises in the guidance since the majority of the key differences between the Wales guidance and the English were detailed within the WFRS framework. The document is also, in the main, reflective of the comments already made as the guidance has developed.

I hope the Authority's comments as detailed above are useful in the finalisation of these important documents.

If I can be of any further assistance please do not hesitate to contact me.

Yours sincerely

Councillor Brian Hall
Chair of the Fire and Rescue Authority