

West Mercia Police and Crime Panel

**Item 7 - Joint Governance of Police and Fire
and Rescue Services in Hereford and
Worcester and Shropshire and Telford and
Wrekin (marked to follow)**

Agenda

**West Mercia Police and
Crime Panel**

**Tuesday, 26 September 2017, 1.30 pm
County Hall, Worcester**

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West Mercia Police and Crime Panel

Tuesday, 26 September 2017, 1.30 pm,

Membership:

Cllr Brian Wilcox (Chairman)	Herefordshire Council
Cllr S M Mackay	Substantive Member - Worcestershire County Council
Cllr Michael Wood	Substantive Member - Shropshire Council
Cllr Gerald Dakin	Co-opted Member - Shropshire Council
Cllr Roger Evans	Co-opted Member - Shropshire Council
Cllr Kevin Turley	Co-opted Member - Shropshire Council
Cllr Stephen Reynolds	Substantive Member - Telford & Wrekin Council
Cllr Rajash Mehta	Co-opted Member Telford & Wrekin Council
Cllr Sebastian Bowen	Co-opted Member Herefordshire Council
Cllr Karen May	Substantive Member - Bromsgrove District Council
Cllr David Chambers	Substantive Member - Malvern Hills District Council
Cllr Joe Baker	Substantive Member - Redditch Borough Council
Cllr Mike Johnson	Substantive Member - Worcester City Council
Cllr Emma Stokes	Substantive Member - Wychavon District Council
Cllr Juliet Smith	Substantive Member - Wyre Forest District Council
Mrs Carole Clive	Co-opted Independent Lay Member
Colonel Tony Ward OBE	Co-opted Independent Lay Member

Agenda

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NOTES

- **Webcasting**

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Agenda produced and published by Simon Mallinson, Head of Legal and Democratic Services, County Hall, Spetchley Road, Worcester WR5 2NP

To obtain further information or a copy of this agenda contact Samantha Morris, Scrutiny Officer on Worcester (01905) 844963 email: sjmorris@worcestershire.gov.uk

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Date of Issue: Monday, 18 September 2017

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WEST MERCIA POLICE AND CRIME PANEL 26 SEPTEMBER 2017

JOINT GOVERNANCE OF POLICE AND FIRE AND RESCUE SERVICES IN HEREFORD AND WORCESTER AND SHROPSHIRE AND TELFORD AND WREKIN

Recommendation

- 1. That the Panel consider and comment on the report from the West Mercia Police and Crime Commissioner (PCC) providing a summary of the initial findings from the West Mercia Fire and Rescue Governance Consultation.**

Background

2. The Policing and Crime Act 2017 introduces measures which encourage emergency services (Ambulance, Fire and Rescue and Police) to collaborate and also enables PCCs to take on responsibilities for the fire and rescue services in their area where proposals are in the interest of economy, efficiency and effectiveness, or public safety.
3. At its last meeting, the Panel was asked to consider the PCC's draft initial business case for the joint governance of Police and Fire and Rescue services in Hereford and Worcester and Shropshire and Telford and Wrekin.
4. Following the initial comments made by the Panel, the PCC was invited to return to Panel with final proposals prior to the indicated submission to the Secretary of State on 1 October 2017.
5. A Report has been prepared for the PCC by his Chief Executive to provide an initial analysis of the consultation results from the PCC's recent public consultation on proposals for the future governance of the two fire and rescue services within West Mercia.
6. The Panel is advised that this report does not contain the PCC's formal response to the Consultation, which will be published in due course. A copy of this report is attached at Appendix 1.

Supporting Information

Appendix 1 – West Mercia Police and Crime Commissioners Report: West Mercia Fire Governance Consultation – Initial Analysis

Contact Points for the Report

Sheena Jones, Democratic, Governance and Scrutiny Manager

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Andy Champness, Police and Crime Commissioner Chief Executive
andrew.champness@westmercia.pnn.police.uk

Background Papers

In the opinion of the proper officer (in this case the Head of Legal & Democratic Services) the following are the background papers relating to the subject matter of this report:

The Policing and Crime Act 2017

Agenda and Minutes of the West Mercia Police and Crime Panel of 19 June 2017

[All agendas and minutes are available on the Council's website here.](#)

West Mercia Fire Governance Consultation – Initial Analysis

Introduction

1. This report has been prepared to provide a summary of the initial findings from the fire governance consultation.

Executive Summary

2. In total **1,307** responses were received. 1279 individuals, businesses or organisations completed the consultation questionnaire and a further 28 written submissions were made.
3. 792 out of 1279 (61.9%) of respondents who completed the consultation questionnaire were supportive of the PCC taking on the governance of the two Fire and Rescue Services within West Mercia.
4. 26 out of 28 (93%) of the written submissions were opposed to the proposal.
5. In total 794 out of the 1307 responses were supportive – **60.7%**

Methodology

6. The Policing and Crime Act 2017 places a requirement on the PCC to consult with the following groups: each relevant authority; people in the area; employee representative groups from the fire service and employee representative groups from the police service.
7. The methods of engagement and communication were tailored to each of the stakeholder groups to increase participation and feedback and these are outlined in more detail later in this report.

Public consultation

8. A public consultation exercise ran for 13 weeks, commencing on 12th June and ending on the 11th September 2017, and followed the Cabinet Office consultation principles guidance.
9. Details of the consultation were published on the PCC's website. This included a dedicated page signposted from the homepage containing details of the

proposals, summary Q&A, highlights from initial business case, link to a consultation questionnaire, a full downloadable version of the consultation pack and the option to request the pack in alternative formats where required.

10. During the course of the consultation the dedicated fire consultation page received 2902 hits of which 2037 were unique views. On average each user spent 2 minutes 54 seconds on the page.
11. The consultation questionnaire gathered data on:
 - whether people supported the single governance model
 - the reasons for their opinion (including a free text box for comment)
 - in what capacity people were responding (community member, business, council, police officer/staff, fire officer/staff)
 - respondent's age
 - respondent's local policing area.
12. The consultation questionnaire was designed to be simple and quick to complete in all formats – either hard copy, on computers or on mobile devices. A copy of the questionnaire is attached at appendix A.

Promotion and engagement

13. The consultation was supported by an extensive programme of promotion and engagement, summarised below.

Media Coverage

14. A media release was issued to coincide with the launch of the consultation and multiple further comments were issued to outlets from the PCC. Over the course of the consultation the issue received more than 50 different individual items of local coverage across the West Mercia area, often featuring multiple times in different outlets, using a range of voices and opinion including:
 - Radio - the consultation was featured on the following radio stations: BBC Shropshire, BBC Hereford and Worcester, Free Radio
 - TV - The PCC was interviewed for both BBC Midlands Today and BBC Sunday Politics
 - Newspapers / Magazines – The consultation featured in a full range of local papers including Worcester News, Shropshire Star, Hereford Times, Kidderminster Shuttle, Redditch Standard, Worcester Observer, Malvern Observer, Malvern Gazette, Droitwich Standard, Bromsgrove Advertiser, Evesham Observer
 - All outlets named above also carried the story on their websites and social media, along with the Shropshire Live site.

Digital platforms

15. The following platforms were used to extend the reach of the consultation, particularly to individuals who were less likely to use traditional media:

- Paid Facebook and Instagram adverts were placed in June with a reach of 44,409, resulting in 400 post engagements
- Twitter posts linked in to local networking groups #HerefordHour, #ShrewsburyHour and #WorcestershireHour were used to increase local reach and engagement.
- Promotional and information messages were delivered in monthly PCC newsletters in June, July and August.

Face to Face

16. The PCC and his staff carried out face to face consultation with members of the public at the following public events over the summer:

- Three Counties, Malvern Worcestershire
- Shobden Food and Flying Festival
- Newport Show
- Oswestry Show
- Pershore Plum Festival

17. Locations were visited across the West Mercia area to carry out face-to-face consultation with communities and businesses in town and city centres:

- Herefordshire: Hereford, Ledbury and Ross on Wye
- Shropshire: Bridgnorth, Ludlow, Market Drayton Oswestry, Shrewsbury and Whitchurch
- Telford: Newport and Wellington
- Worcestershire: Bromsgrove, Kidderminster, Worcester, Redditch and Pershore

Meetings

18. The PCC, his Deputy or senior staff members attended the following public stakeholder meetings to discuss the fire governance proposals:

- 14 June – Shropshire Fire and Rescue Authority AGM
- 27 June – Hereford and Worcester Fire and Rescue Authority
- 28 June – Worcestershire County Association of Local Councils (CALC)
- 17 July – Shropshire Association of Local Councils (SALC)
- 17 July – Telford and Wrekin Council's Customer, Community and Partnership Scrutiny meeting
- 18 July – Worcestershire County Council's Overview and Scrutiny Performance Board

- 8 Aug – Bromsgrove Area Local Joint Committee
- 21 Aug – Herefordshire Council's General Scrutiny Committee
- 24 Aug – Bewdley Town Council meeting
- 4 Sept – Hereford and Worcester Fire and Rescue Authority
- 4 Sept – Shropshire County Council's Communities Overview Committee
- 5 Sept – Herefordshire and Ludlow College
- 6 Sept – Much Wenlock Local Joint Committee

19. The PCC also met local authority leaders on an individual basis to further discuss the proposals.

Internal police / fire promotion

20. To raise the profile of the fire governance proposals with the officers and staff of the two affected fire services and West Mercia Police, internal messaging took place within each organisation:

- Hereford & Worcester Fire Service - internal message was sent to all staff, message in Chiefs' bulletin, FAQ section on intranet, reminders sent out via email
- Shropshire Fire Service – internal messages via newsletter and intranet to all staff
- West Mercia Police - via an internal Postmaster to all officers and staff

Letters

21. The PCC wrote to a range of stakeholders including MPs, council leaders and fire authority members, and all staff associations and representative bodies. Each recipient was sent a copy of the full consultation pack containing the initial business case, a document outlining PCC commitments for fire governance, a Q&A paper and a copy of the consultation questionnaire document.

22. In addition, the Association of Local Councils was contacted asking them to promote the consultation to their networks of town and parish councils.

Responses

23. In total **1279** individuals / businesses or organisations had completed the consultation questionnaire prior to the consultation closing. In addition a further **28** written submissions were received. Based on the ONS 2016 Midyear estimates (issued June 2017), this number of responses is above the level required to achieve a 95% confidence level with a 3% margin of error based on the total random size.

24. Findings from the consultation questionnaire are summarised in the 'Survey findings' section of this report. This analysis does not include any questionnaires received after the closing date.

25. In addition 3 written submissions were made by members of the public, these are attached as part of appendix B. The PCC has also received a petition signed by 96 individuals opposing the proposals from a Shropshire Councillor. It cannot be established whether signatories are duplicate respondents.

Stakeholder response

26. In line with legislation the consultation sought views from the four top tier local government authorities within West Mercia. The following responses were received:

- Herefordshire Council – oppose the proposal (submission attached at appendix C).
- Shropshire Council – oppose the proposal (submission attached at appendix D).
- Telford and Wrekin Council* – oppose the proposal (submission attached at appendix E).
- Worcestershire County Council* - oppose the proposal (submission attached at appendix F).

(* requested an extension of the consultation deadline to allow consideration at the relevant council meeting)

Responses from representative bodies

Fire representative bodies

27. All fire unions were invited in writing to take part in the consultation and to meet with the PCC with the aim of giving them the opportunity to discuss the proposals in more detail with him. Subsequently the PCC met with branch representatives of both the Hereford and Worcester and the Shropshire Fire Brigade Union and the Fire Officers' Association. Written responses were received from:

- Hereford and Worcester Fire Brigade Union – oppose the proposal (submission attached at appendix G)
- Shropshire Fire Brigade Union – oppose the proposal (submission attached at appendix H).
- Association of Principal Fire Officers – oppose the proposal (submission attached at appendix I).
- Fire Officers' Association - support the proposal in principle (submission attached at appendix J).

Police representative bodies

28. Police unions and associations were invited in writing to take part in the consultation and to meet with the PCC with the aim of giving them the opportunity

to discuss the proposals in more detail with him. No meetings were requested and no consultation submissions were received.

MP's

29. Philip Dunne MP has written to the PCC outlining a number of observations on the proposals (submission attached at appendix L).

Other stakeholders who participated

30. A number of full written submissions were received from other local stakeholders:

- Four second tier councils responded – all oppose the proposal.
- 10 town and parish councils responded in writing, plus one association of local councils. All were opposed to the proposal.
- Both fire and rescue authorities responded – both oppose the proposal

A copy of 'other stakeholder' comments is attached as part of appendix B.

Survey findings

31. The survey sets out the PCC's proposal to take on governance of local fire services in Herefordshire, Shropshire, Telford & Wrekin and Worcestershire and in doing so seeks to find out whether this proposal is supported along with some details about the respondent.

Support for the proposal

32. Of the 1279 individuals, businesses or organisations who completed the survey questionnaire the majority supported the proposal:

- 61.9% (792) were in support
- 38.1% (487) were against the proposal

33. Table 1 below shows the support for and against the proposal broken down by respondent type and shows that individual members of the public and businesses were the most supportive of the proposal, and employees and councillors were mostly against the proposal.

Answering as/on behalf of	Support	Against
An individual member of the community	64%	36%
A business	87%	13%
As an employee or volunteer with the police or fire service	37%	63%
As a councillor or on behalf of a council	33%	67%

Table 1

34. Respondents were then asked what the main reasons for their answer had been and were given a number of options to choose from as well as the opportunity to provide a free text answer if they wished¹. The results are shown in figures 1 and 2 below.

35. For those in support of the proposal, 'financial considerations', was the primary reason for their decision across all types of respondent, except for business respondents who stated 'levels of collaboration', (62.8%) was equally as important as 'financial considerations' (62.8%).

36. For those against the proposal, replacing the existing fire and rescue authorities was the main reason for their opposition. However, the primary reason varied across respondent type. For councillors and businesses other was the main reason, for individuals it was replacing the existing Fire and Rescue Authorities and for employees both service resilience and replacing the existing Fire and Rescue Authorities were the main reasons for opposing the proposal.

¹ Respondents could choose as many of the options as they wished

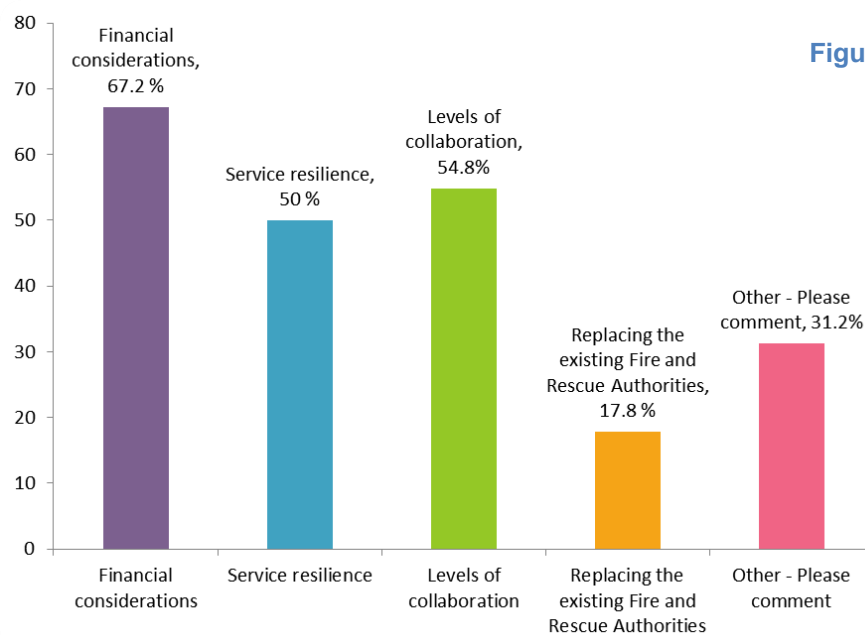


Figure 1 – support the proposal

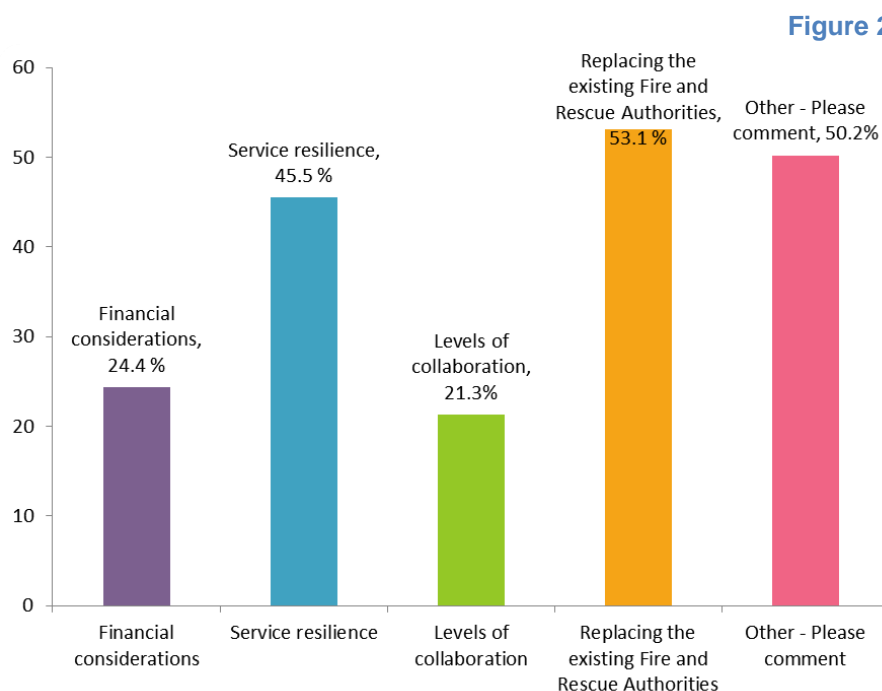


Figure 2 – against the proposal

37. In total, of the respondents who supported the proposal and ticked *other* as one of their main reasons 247 made a comment. 484 of the respondents against the proposal who ticked *other* also commented. An initial analysis shows that there are a number of themes arising from the comments made by those for and against the proposals. More analysis of these comments will be undertaken to enable the PCC to provide a response to these in his formal response to all stakeholders, which as stated earlier is not contained in this report.

38. The 5 most common themes for each of the supporting and opposing responses are shown below. Please note respondents may have commented on more than one theme and each has been counted.

Comments in support of the proposal

- Want to see frontline officer numbers protected – 40 related comments
- Want to have the PCC governing the fire service in preference to a fire authority – 34 related comments
- Financial / cost saving benefits – 31 related comments
- Shared service / collaboration opportunities – 22 related comments
- Service improvement opportunities – 17 related comments

Comments against the proposal

- Seen as too much work for one person or empire building – 70 related comments
- Opposed to the idea of a PCC / involvement of politics – 42 related comments
- It will reduce accountability and scrutiny – 31 related comments
- The police service and fire service operate differently / detrimental to fire to be associated with the police – 28 related comments
- Concerns about the possible amalgamation / merger of the two services – 16 related comments

A copy of all the comments made is attached at Appendix K.

About the respondents²

39. Respondents were asked a small number of questions about themselves, namely what sort of respondent they were, their age and where they lived (based on local policing area boundaries).

Respondent type

40. As can be seen from figure 3 the majority of respondents were individual members of the public. Of the survey respondents who were employees/volunteers of either the police or fire service, 12.5% work for Hereford and Worcester Fire Service, 52.9% work for Shropshire Fire Service and 35.6% work for West Mercia Police. The majority (57.8%) of respondents who stated they were a local councillor represent either a town or parish council

² All data is based on the number of respondents answering the individual question

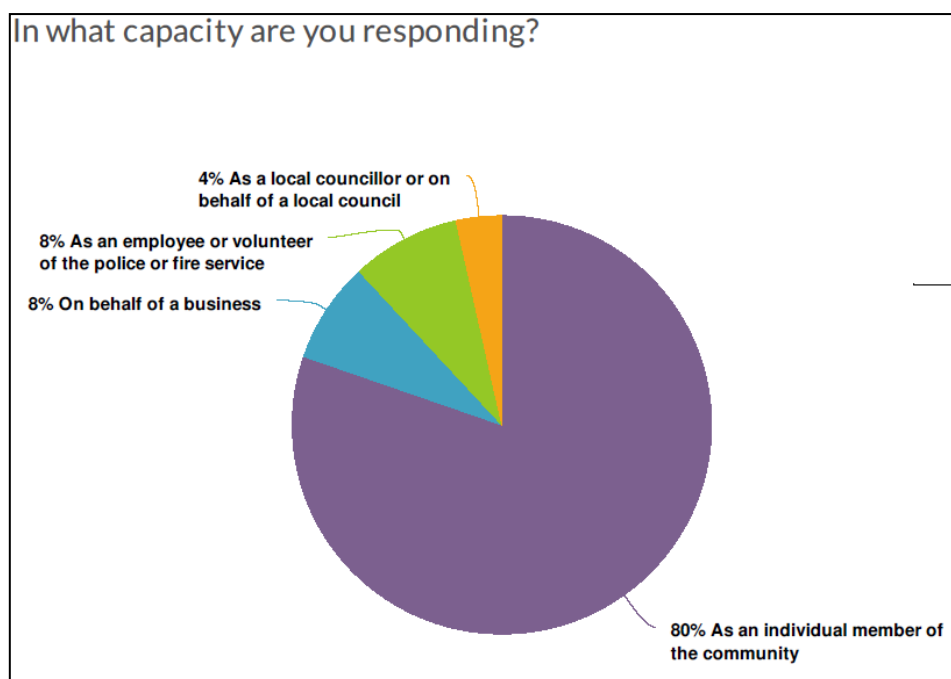


Figure 3

Respondent age

41. The majority (42.4%) of respondents were aged 40 -64. The 65 and over age group were the next highest at 30.7% and 7.4% of respondents were aged 25 and under.

Respondent location

42. Table 2 below provides a comparison of population size and response proportions. The area with the greatest number of respondents is Worcestershire which is the largest area of West Mercia based on population size. Telford and Wrekin is the smallest part of West Mercia based on population size and had the lowest number of responses, excluding those respondents who stated *other*. Of the 3% of respondents who stated *other* many were from bordering areas.

Area	Population*	Population as a % of the West Mercia total	% response to the consultation
Herefordshire	189,309	15%	15%
Shropshire	313,373	25%	34%
Telford & Wrekin	172,976	14%	6%
Worcestershire	583,053	46%	42%
'Other'	-	-	3%
West Mercia total	1,258,711	100%	100%

Table 2: *Population figures are taken from the ONS 2016 Mid-year estimates (issued June 2017)

Conclusion

43.61.9% of respondents who completed the consultation questionnaire were supportive of the PCC taking on the governance of the two Fire and Rescue Services within West Mercia. This is in contrast to the response from the statutory consultees and other stakeholders who all bar one were opposed to the proposals (plus one individual response which is unclear).

Andrew Champness
Chief Executive

Appendices

Appendix A – Copy of the survey questionnaire
Appendix B – Copy of the other stakeholder submissions received
Appendix C – Hereford Council's consultation submission
Appendix D - Shropshire Council consultation submission
Appendix E – Telford and Wrekin consultation submission
Appendix F – Worcestershire County Council consultation submission
Appendix G – Hereford and Worcester FBU consultation submission
Appendix H – Shropshire FBU consultation submission
Appendix I – Association of Principal Fire Officers' consultation submission
Appendix J – Fire Officers' Association consultation submission
Appendix K – Copies of all comments made in the free text section of the online questionnaire
Appendix L – Philip Dunne MP letter

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WEST MERCIA FIRE AND RESCUE GOVERNANCE

CONSULTATION

The Police and Crime Commissioner is proposing to take on governance of local fire services in Herefordshire, Shropshire, Telford & Wrekin and Worcestershire.

This would result in:

- Estimated £4 million annual savings through improved efficiencies.
- Closer collaboration between police and fire services.
- Improved resilience for ensuring public services.
- No changes to frontline officers or services
- A system of a directly elected Police, Fire and Crime Commissioner.

Q1 Do you support these proposals?

Yes ☐

No ☐

Q2. What are the main reasons for your answer to question 1? (Please tick all that apply).

Financial considerations ☐

Service resilience ☐

Levels of collaboration ☐

Replacing the existing Fire and Rescue ☐

Authorities

Other (Please Specify):

About You

Q3. In what capacity are you responding?

As an individual member of the community ☐ (Please go to question 6)

On behalf of a business ☐ Please go to question 7)

As an employee or volunteer of the police or fire service ☐ (Please go to question 4)

As a local councillor or on behalf of a local council ☐ (Please go to question 5)

Q4. Do you work for any of the following? (This can include in a voluntary capacity)

Hereford and Worcester Fire and Rescue Service ☐

Shropshire Fire and Rescue Service ☐

West Mercia Police ☐

Q5. Are you any of the following?

Town or Parish Councillor ☐ Unitary Councillor ☐

District / Borough / City Councillor ☐ County Councillor ☐

Providing an official response on behalf of the following Council

Q6. Please confirm your age

Under 18 ☐ 40 - 64 ☐

18 – 25 ☐ 65 and over ☐

26 – 39 ☐ Prefer not to say ☐

Q7 Please confirm which local policing area you live in (or are located in if you are responding on behalf of a business, organisation or a council)

Herefordshire ☐

Shropshire ☐

North Worcestershire: Bromsgrove, Redditch, Wyre Forest ☐

South Worcestershire: Malvern Hills, Worcester City, Wychavon ☐

Telford and Wrekin ☐

Other (Please specify)

THANK YOU FOR TAKING THE TIME TO TAKE PART IN THIS CONSULTATION.

Please post your completed questionnaire to:

John Campion, West Mercia Police and Crime Commissioner, Hindlip Hall, Worcester WR3 8SP

The closing date for the consultation is **Monday 11th September 2017**

Results will be published in due course on: www.westmerica-pcc.gov.uk

FIRE CONSULTATION RESPONSES

Members of the public / businesses - written submissions

In view of the recent FIASCO, involving your leader and Prime minister, I think you should be trying to get CLOSER to the PUBLIC. MRS. (EQUALITY)MAY has GAMBLED and FAILED, I want SERVICES, and if these have got to be paid for by INCREASED TAXES, then I want to be CONSULTED, I was born in the town in 1948, the population has increased, yet the policing has got WORSE, we had a SUPERINTENDENT based in Evesham controlling 100 officers, now we have a sergeant? .A police house /officer, in every village, sold off by the CONSERVATIVES? IF the FBU are to be believed Evesham's overnight fire cover, will be provided by PART TIME RETAINED FIREFIGHTERS. In CONCLUSION I would like to see your CV, to see if you're a part time County /District councillor drawing ALLOWANCES, in addition to your £70k+ P&CC SALARY.

When bodies get so big issues arise, need to stick to one job ?

I am responding as a Member of the Public to your proposals to take over Shropshire and Wrekin Fire and Rescue Authority please don't assume that I'm interfering I'm only trying to help.

Stage One

The proposed takeover of the control room of Shropshire Fire and Rescue Service to create the three counties super control room based as West Mercia Constabulary force headquarters Hindlip Hall Worcester.

Stage Two

The proposed creation of West Mercia Constabulary Police and Fire Authority which is the next step.

Stages Three and Four

Just like you would have done with the control room of Shropshire Fire and Rescue stages 3 and 4 would be done same as the Shropshire Division of West Midlands Ambulance and Paramedic Authority.

Q1 Do I support your proposals

Answer. I can only support your proposals only if after stages one and two you improve Shropshire Fire and Rescue Service what I mean by this is there are lot of people in Shropshire who would like to presume that Shropshire is 50 years behind and I can only support your proposals if you can try to agree to take Shropshire Fire and Rescue Service forward 50 years my proposals shall be set up further down.

Q2 What are my main reasons for answer to Q1

Here are my answers financial considerations, service resilience, service collaboration, replacing the existing fire and rescue authorities and upgrading West Mercia Constabulary and Shropshire Fire and Rescue Service.

Q3. In what capacity are you responding

Answer. As an individual member of the community of Shropshire as I believe when you grow up within a emergency service there comes a time when you need to give something back and never take an emergency service for granted.

Q4 Do you work for any of the following: Hereford and Worcestershire Fire and Rescue Service, Shropshire Fire and Rescue Service and West Mercia Constabulary

Answer. I currently do not work for either Hereford or Shropshire Fire and Rescue Service or West Mercia Constabulary

Q5. Are you any of the following, Town or Parish Council, District/Borough/City Councillor, Unitary

Answer. At present I am not a Councillor

Q6 Please confirm your age.

Answer 47

Q7 Please confirm which local policing area you live in

Answer Shropshire

Other Stakeholders – Written Submissions

SECOND TIER COUNCILS
<p>Malvern Hills DC</p> <p>Thank you for the opportunity to respond to the current consultation on proposals to change the fire governance across the West Mercia area involving the PCC taking over responsibilities from the current two Fire Authorities.</p> <p>I recognise that district councils are not statutory consultees but hopefully our response is helpful as the proposals will affect one of our key frontline services serving our communities. I am sending this response on behalf of the District Council. Our Overview and Scrutiny Committee considered a report on your proposals at its meeting on 27th July 2017 and made some specific comments and questions which are included below.</p> <p>We have the highest respect and support for all of our ‘blue light’ services and it is hoped that the current proposals will not have any impact on the ability of all of these services to continue to deliver to the highest quality. The Malvern Hills district is very rural and the Hills pose a fire and rescue risk and we would wish to see the excellent cover maintained.</p> <p>The Council acknowledges that the Act allows for Police and Crime Commissioners to consider governance changes in the manner you are proposing. Clearly, you will need to make a judgement whether the timing of the proposals is right and serves the best interest of our communities. Our Overview and Scrutiny Committee has asked if the model you propose has been used elsewhere; and if so has it been successful? There has been some concern raised by Councillors that a democratic deficit could be created by replacing the councillors who sit on both Fire Authorities with a single person.</p> <p>Increased joint working between the two fire services within West Mercia is perhaps a much more effective route to pursue by the two respective Fire Authorities rather than start with governance changes. Our experience of joint working is that it builds resilience, improves services and delivers managerial savings where there is duplication whilst protecting the frontline services. We believe that this could equally be true of the two fire services having a much closer integration.</p> <p>From a financial standpoint, the business case, which states a saving of £4m from the proposals, does not appear to be clear enough on how those savings would be achieved. Again, our Overview and Scrutiny Committee has asked that the independence used to assess the report of the business consultants should be demonstrated, if this were to go ahead.</p> <p>In summary, while the Council is not persuaded that the governance changes are required at this time we support any efficiency gains and options for increased resilience both between the two fire services and by West Mercia Police working with the fire services.</p>
<p>Redditch Borough Council</p> <p>I am contacting you in my capacity as Leader of the Council to outline Redditch Borough Council’s response to the current consultation process in respect of the future governance arrangements for the Hereford and Worcester and Shropshire Fire and Rescue Services.</p> <p>During a meeting of full Council in Redditch, held on 24th July 2017, the West Mercia Fire and Rescue Governance consultation pack was debated by Members. Based on the content of the consultation pack and the points discussed by Members during the meeting it was concluded that Redditch Borough Council’s preferred option would be for the current governance arrangements that are in place for the Hereford and Worcester and Shropshire Service to continue. I have attached a completed copy of the consultation form together with an extract from the minutes of the Council meeting which provides further information about the background to our position.</p>

Worcester City Council

I am writing in relation to the recent meeting, convened by the Communities Committee, here at Worcester City Council. An informal session was held at the Guild Hall on Wednesday August 2 2017. The objective was to engage all member in the consideration of the Fire and Rescue Governance proposals for consultation and to develop a response. Thank you for the input provided by Andy Champness who attended the meeting along with Gareth Boulton to introduce the proposals and answer questions.

Following an extensive and lively debate I now enclose the completed consultation form which represents the cross party view of Members at Worcester City Council, for your due consideration. It is recognised that the City Council is not a statutory consultee in this matter, however it is equally anticipated that our collective opinion will add value to the process.

Should any further engagement with this process be required, the opportunity to input into and shape future governance proposals would be welcomed. (COMPLETED CONSULTATION SURVEY INPUT)

Wychavon District Council

On behalf of Wychavon District Council, thank you for the opportunity to respond to the current consultation on proposals to change the fire governance across the West Mercia area involving the PCC taking over responsibilities from the current two Fire Authorities. I recognise that district councils are not statutory consultees but hopefully our response is helpful as the proposals will affect one of our key frontline services serving our communities.

I am sending this response on behalf of the District Council which considered the consultation at its meeting on 26 July 2017.

We have the highest respect and support for all of our 'blue light' services and it is hoped that the current proposals will not have any impact on the ability of all these services to continue to deliver to the highest quality.

The Council acknowledges that the Act allows for Police and Crime Commissioners to consider governance changes in the manner you are proposing. Clearly, you will need to make a judgement whether the timing of the proposals is right and serves the best interest of our communities.

Increased joint working between the two fire services within West Mercia is perhaps a much more effective route to pursue by the two respective Fire Authorities rather than start with governance changes. Our experience of joint working is that it builds resilience, improves services and delivers managerial savings where there is duplication whilst protecting the frontline services. We believe that this could equally be true of the two fire services having much a closer integration.

From a financial standpoint, the business case which states a saving of £4m from the proposals does not appear to be clear enough on how these savings would be achieved. In summary, while the Council is not persuaded that the governance changes are required at this time we will support your aims to achieve any efficiency gains and options for increased resilience both between the two fire services and by West Mercia Police working with the fire services.

TOWN AND PARISH COUNCILS**Alvechurch PC**

Alvechurch Parish Council welcomes the opportunity to comment on the Police & Crime Commissioner's (PCC) proposals to bring together police and fire service governance within his role as Commissioner. He expects that by replacing the committees currently responsible for the Shropshire and Hereford/Worcester Fire Services, he will achieve better collaboration between police and fire services and significant savings through efficiency gains of over £4 million per year.

We, as a council, do not support the PCC's proposals and offer the following points in support of our position:

The basis in law or in government policy for a PCC to take on Fire Service governance is not clearly given in these consultation papers from Mr Campion. If this is speculative activity by Mr Campion and other PCCs in a few places, the results could be several forced and unhappy service combinations and a too piecemeal, country-wide arrangement.

However we now know from further study, that support for exploration of the PCC acting as Fire Service Authority comes from the Policing and Crime Act 2017 which, among other matters, contains a wide range of measures to improve the efficiency and effectiveness of police forces, including through closer collaboration with other emergency services and to enhance the democratic accountability of police forces and fire and rescue services (Home Office Circular of March 2017 provides details of the provisions of the Act coming into force on or before 2nd May 2017).

Taking on the role of Fire Service Authority is one of several new arrangements for the PCC that the Act permits and we will comment later on the benefits of giving prior consideration to these other routes.

We have yet to see convincing evidence that PCCs are the successful model for Police Service governance as it does seem to depend on the qualities of the particular post holder. Mr Campion in his first year has produced a useful plan for a Safer West Mercia in the period 2016 to 2021 and the matters to which he will give particular attention as Commissioner run from page 4 to page 12. In Appendix 1 the Commissioner then adds his pledge to sustain existing and build new partnerships towards a Safer West Mercia – no mention here of acting as Fire Service Authority .

We think in this, his second year in office, and with much of the timeframe for the Police Plan still remaining, it is too early for him to consider seeking the Home Secretary's agreement to take over as the Fire Service Authority for Shropshire and Hereford / Worcester. There is also accumulating evidence from the Inspectorate of Constabulary and the Independent Police Complaints Authority that changes and/or improvement in the Police Service's performance are needed in those police services to which these matters apply. Surely a PCC's over-riding priority is to hold the Chief Constable to account and to maintain this focus on policing and crime reduction.

This proposal to extend the PCC's role to cover fire services looks to be a too top-down initiative with little evidence provided in the consultation papers of what the two fire services covering West Mercia themselves might be proposing in terms of future ways of working including greater collaboration

We consider that recent developments in England relating to terrorism and the police response and to the safety of buildings and the fire services response have stirred public concern. Whilst savings across emergency services should always be investigated, the national mood is currently very much against proposals to save money in that sector. Greater investment is clearly needed in our emergency services: in the Police Service to recruit more officers and strengthen areas like cyber-crime and especially in the Fire Service to promote more rigorous fire inspections. Public perception of a desire for more savings in the emergency services will not be positive even if the claim is that the PCCs projected £4m savings will not impair fire services front- line capabilities. That public perception could also extend to concern over whether there is a natural blending of criminal investigations with rescue services.

The PCC's initiative around governance will have been helpful if it does encourage a review by the two fire services in question of how they might be better managed and structured to work together, and with the police service for greater effectiveness and efficiency. It is here that the new Policing and Crime Act 2017, Sections 1- 5, on collaboration agreements are helpful in introducing new duties on police, fire and rescue and emergency ambulance services to keep opportunities to collaborate under review, and further, to enter into collaboration agreements where it is in the interests of their efficiency or effectiveness. This sets a clear expectation that collaboration opportunities should be fully exploited and this is where we consider the PCC should direct his best efforts towards a West Mercia Fire Service that forms organically from within the existing Fire Services and then enters into a formal collaborative relationship with West Mercia Police.

Collaboration efforts will almost certainly be assisted if, in using section 7 of the 2017 Act, the West Mercia PCC seeks representation on the local Fire and Rescue Authorities and with their agreement, becomes a

member of those two authorities with voting rights. We see governance as a later step, better considered within the process of these service collaboration and service authority membership developments. Trials of combined police and fire service models **in a semi-rural, low-problem area** under the auspices of the national Emergency Services Collaboration Working Group **would be a useful way forward. From the particular perspective** of a Parish like Alvechurch, which has a common boundary with Birmingham and major infrastructure connections with the city, closer collaboration between West Midlands and West Mercia emergency services would be a model we would like also to see being trialled.

The collaboration debate as it relates to emergency services and where savings might continue as a Government imperative, inevitably will bring in consideration of a reduction in the number of Police Forces around the country (as has happened in Scotland). This would generate savings, though it could result in some Police & Crime Commissioner posts being lost. Any savings that do accrue from any such changes must be directed back to front-line services i.e. more officers on-the-beat or in detective work....and/or more firefighters.

Clun PC

Clun Town Council with Chapel Lawn objects to the proposals for the West Mercia PCC to take over governance of the Fire and Rescue Service. We concur with the objections raised in the response from the Shropshire Fire Service

Dodford with Grafton PC

Dodford with Grafton Parish Council considered that it was difficult to respond to the proposals in this consultation without the wider context. The proposals would need to be properly costed and very clear about budgetary responsibility and overall control. It would be helpful to know if what was proposed had been implemented in any other area and if so with what result. However, the wider issue was the national context and whether these proposals were appropriate just for West Mercia. The Council could not reasonably form a view without knowing whether the proposals were consistent with what was being considered at national level and properly debated in that wider context, including a consideration of how all the emergency services operates.

Great Hanwood PC

I write on behalf of Great Hanwood Parish Council in relation to this matter. The parish council objects to this proposal because it is concerned that this represents an over centralisation of power with too much control resting with one person. The parish council also has concerns that the PCC lacks the specialist knowledge to govern the Fire Service effectively.

Hadley and Leegomery PC

The Parish Council has considered the above and has resolved to **object** to your proposals to take on the roles currently performed by two local Fire Authorities within your policing area.

The Parish Council notes that the Fire Authority has reduced its budget by 15% since 2012, achieving savings of £3.5m. The Council further notes the Fire Authority's plans to make additional savings of more than £400k by 2020 which would enable it to deliver services without any reduction in the front line, and that it has already invested in appropriate technologies to enhance Shropshire Fire and Rescue Service's organizational resilience and improve its operational efficiency.

The current and future savings have been achieved as a result of staff engagement, public consultation and prudent financial planning from the Authority. The Parish Council is not persuaded that there is a compelling argument for changing the existing governance arrangements.

Oswestry Rural PC

Further to your recent consultation on changing governance arrangements for the local fire services, Oswestry Rural Parish Council considered all the relevant information at its meeting on 29 August 2017. I have been asked to respond that the Parish Council resolved to object to your proposals.

Oswestry TC

The Town Council has considered the above Consultation Paper whereby the Police and Crime Commissioner suggests that by changing governance arrangements for our local fire services, he can deliver more efficient and effective services to our communities. The Town Council wish to strongly oppose the measures as suggested. This on the basis that there are no public concerns over the existing arrangements

and significant concern is voiced over how the Police and Crime Commissioner appears to be exercising more power over significant and long established public services.

The Town Council challenge the financial savings and question the due diligence that has been afforded to the exercise.

There are also major concerns over the potential loss of local accountability if the measures were to be introduced.

It is sincerely hoped that the Police and Crime Commissioner will accept the lack of public appetite and the views of the professionals in this matter; however if the intention is to pursue, then the Council extend a formal invitation for the Police and Crime Commissioner to attend a meeting in Oswestry so that public views can be expressed.

Rock Parish Council

At our most recent Council Meeting my Council considered your Consultation Paper very carefully. Council acknowledges in all public services there is, in the current economic climate, a clear need for savings and it is noteworthy that as PCC you decided to address this. Clearly there is justification for you doing so within the Police services, but the logic behind you trying to do so in another service is not so clear and has arguably, not been made any clearer by this paper.

The respective Chief Fire Officers of Herford and Worcester and of Shropshire are, doubtless, equally aware of the need for economies, and HWFRS carried out an extensive survey of cost cutting proposals in 2013.

Council agreed, there are, and will be, needs for savings and efficiencies for the foreseeable future, but the claim, in the letter attached to your foreword, that the only way this can be achieved is by making your proposed changes, seems too narrow a perspective.

It is not reasonable to assume that as a member, presumably an active one, of HWFR authority for some years, many of your suggestions for efficiency and savings would have been made before. Had they been considered viable by the Fire Authority and the service at that time, surely they would have been implemented.

Whilst the leaders of the FRS's have been consulted about these proposals, your report appears to have taken little account of any views, opinions or suggestions of the other parties regarding their governance. For instance, have the two FRS's expressed any interest in changing their governance system to a commissioner, along the lines of the PCC model, rather than an authority in order to help them make savings? Have they shown any interest in amalgamation between themselves, let alone with the Police?

As far as the latter is concerned, there seems to be some evidence to the contrary, not least because, whilst the public hold both services, in high esteem, their feelings towards the Police are, apparently, not the same as their feelings towards the FRS. There is some merit in the suggestion in the recent report from Shropshire FRS that, there may be some advantages in an amalgamation of FRS and the Ambulance service and that this would make more sense than the proposals put forward by your PCC report for the amalgamation of FRS's and the Police.

Council further debated the salary that goes with the position of PCC they believe it should be a full time job. Council believes that given you currently hold other positions in public office, it is hard to see how you can consider finding the time to take on, and give adequate time to, another complex role. From a cost cutting viewpoint, to propose undertaking further responsibility, with, initially, no increase in salary, is very noble but it might be considered naïve to believe that this would remain the situation in future years.

If, as suggested, no changes to front line services are proposed, all cost cutting would be back office support staff and, presumably, from the current leadership plus the modest saving of fees paid to members of the Authorities. It is easy to imagine a scenario where the savings made by getting rid of a management salary here or there, together with the saving of the cost of having 50 or so County Councillors sitting as FRS authorities, could soon be eroded by salary increases among the remaining managers who have had to take on expanded duties.

Council believes it is reasonable to assume both the Police and the FRS have addressed the need to find ways of reducing the cost of back room as well as front line services and have taken, or are taking, steps to improve the efficiency of these operations. It is hard to see how, in the vast majority of situations, given the totally different operational roles and activities of the Police and FRS, the back room activities could possibly be handled by the same staff.

Council agreed, that there may be scope for considering the sharing of buildings and common facilities where new buildings are needed, but not at the expense of abandoning existing, sound premises and then spending valuable resources adapting others to make them suitable.

Doubtless, all these, and many other, possibilities will have been considered at length by the two FRS's in the proposal if they consider amalgamation is advantageous. Whilst there may appear to be, to an outsider, some obvious advantages to amalgamation and co-operation at varying points, those in day to day contact with the system are surely best placed to decide on the advantage or otherwise of any such proposal. It is also reasonable to imagine that complete cross border co-operation already exists where and when necessary and that deeper integration has probably also been discussed in the past.

It is reported you said at the meeting of the HWFRA on June 5th "The job of holding to account is what we are debating here". Your suggestion that a commissioner, would do a better, more efficient job than is currently being done the two existing FR Authorities. More specifically, you suggest that as joint Commissioner you would do the best job.

Council believes that the idea that having the FRS answerable to one elected commissioner is somehow more democratic than having it answerable to 25 elected councillors sitting as the FRS, is certainly hard to accept. Also coming, as they do, from different backgrounds and areas within the FRS region, 25 members of an authority would, arguably, be a useful source of local information to the chief fire officers, and a great aid in their management decision making.

Your commissioned report offers only three possible choices. It would be interesting to know if the FRS's consider governance changes necessary and as a route to cost saving and, if so, what other options they feel are worth considering.

On balance, given that the answers to the questions in the report, seem to raise many further questions, the subject has clearly not been aired sufficiently, nor would it seem, have all the possible options been considered.

Much more information is needed and more discussion needs to take place before game-changing steps are taken, Changes which may well prove to be most unpopular, and possibly demoralising, to both the members of the three services and members of the public.

Council believes that if you really wish to gather as much opinion about your proposal as possible then it seems that the proposed deadline is too soon.

From the information provided in the consultation document, and from the evidence currently available from other sources, Rock Parish Council is not in favour of the proposed changes in Governance for the H&W and Shropshire FRS's.

It was felt by member that the dedicated Fire Service we have now is the best on offer and Council RESOLVED unanimously to support a proposal to leaving the Hereford and Worcester Fire and Rescue Authority and West Mercia Police Authority alone as two separate organisations with governance as it is now.

Shrewsbury Town Council

Members of Shrewsbury Town Council have had an opportunity to review the West Mercia Fire & Rescue Governance Consultation and we wish to make the following comments.

Just by way of background we are your largest Town Council within your area and act as lead organisation of the Team Shrewsbury Partnership. We have seen close hand how not only West Mercia Police & Shropshire Fire & Rescue but also other organisations work collaboratively together whilst operating under different governance structures. This has been done through a change in culture with operatives and also a clear understanding of the benefits that can be achieved by closer working.

Members are at a loss to understand how you feel the management of police and fire services across four principal authority areas under one single commissioner is likely to become cost effective. Whilst there is much played on the reductions in costs incurred by the Fire Authorities, there is very little on likely increases in costs of the Office of the Police & Crime Commissioner. The suggestion of saving £4m a year comes without any clear business plan on how this will be achieved.

Members also fail to understand the appointment of the Police & Crime Commissioner as the sole commissioner for Police & Fire is improving democratic accountability. The Fire Authorities also have a panel of democratically accountable elected members who by their very nature have a hands-on understanding of the area they serve.

With the reduction in local democratic accountability and lack of clarity as to savings, Shrewsbury Town Council is opposed to proposals to changing the governance arrangements of local fire services in the area.

Stone Parish Council

At our most recent Council Meeting my council considered your Consultation Paper very carefully. It was felt by members that the dedicated Fire Service we have now is the best on offer and Council RESOLVED unanimously to support a proposal to leaving Hereford and Worcester Fire and Rescue Authority and West Mercia Police Authority alone as two separate organisations with governance as it is now.

My Council do not want to see “operational matters” being transferred into the hands of the Police Commissioner who they believe is already a busy position covering the West Mercia Division on its own.

Stone Parish Council wish to express their total support for our dedicated Fire and Rescue Service and the separation it currently has between the West Mercia Police Force.

FIRE AND RESCUE AUTHORITIES

Hereford and Worcester Fire and Rescue Authority

I am writing to provide you with the formal response of Hereford & Worcester Fire Authority to your Initial Business Case (IBC), which recommends a PCC-governance takeover of both Fire and Rescue Services in the West Mercia area.

Firstly, can I thank you for the opportunity that you offered to the fire authorities to provide evidence and context to the consultants as they developed the IBC, which also allowed for some robust debate and challenge to take place prior to its publication.

However, on its publication, it became evident that the genuine concerns raised by the fire authorities during the process had not been reflected in the final document. This led the constituent authorities to ask their respective fire authorities to jointly commission an independent analysis of the IBC, in order to provide a critically constructive view of both the recommendations and any associated rationale and evidence base that supported them.

The analysis report was authored by a former chief fire officer and a former senior public sector manager – both with significant experience in organisational collaboration, as well as shared service and outsourcing models. I have attached the analysis report for your information but I would like to highlight some key findings that the fire authority unanimously felt made the IBC a flawed business case which, as a result, they cannot support:

- a lack of overall detail and clarity of the IBC – particularly in relation to both the nature of and plans to achieve the estimated £4m of savings, as well as how the change in governance was, in itself, the fundamental driver in making it happen;

- the IBC is unclear about the timeline for achieving the savings – as well as there being some real confusion as to whether the proposed changes would or would not impact on operational effectiveness and efficiency of the fire services;
- the scale of benefits (not only from sharing enabling services but also from the shared use of ICT and data) are highly questionable as they appear to be based on academic and theoretical industry standards, as opposed to the reality of three organisations that had already undergone significant change and rationalisation for almost a decade in the face of prolonged public sector austerity and reductions in both annual revenue and capital investment funding;
- an apparent lack of understanding that many so-called "enabling services" including senior managers and training functions are carried out by staff who also have operational responsibilities. The inclusion of such roles within any proposed savings will therefore also reduce operational frontline staff

During the Fire Authority's debate on the IBC, which included the presentation of the analysis report, a number of other areas of concerns were also voiced by fire authority members regarding the practical deliverability of the proposed benefits. Most notably these included the following issues:

- Concern that West Mercia Police were already in the middle of a substantial transformational alliance programme with Warwickshire Police (which requires a significant investment of both people and resources to make it a success) – potentially leading to direct conflict with and/or poorer outcomes for any Police-Fire collaboration work.
- Recognition that the Police were only one of the many partners that Fire currently work with – especially in the wider harm prevention and public wellbeing arenas – which raised concern that Fire's important partnership contribution outside of its work with Police could be detrimentally impacted.
- Appreciation that the delivery of better community outcomes should be the key driver when considering if any collaboration work is worth undertaking in the first place – which, in turn, could mean having to invest in the appropriate time, effort and resources in order to make such initiatives happen. In contrast, the IBC seemed wholly focussed on reducing organisational costs without any real appreciation of the potentially negative impact this could have on ability of the three organisations to deliver such innovation.
- Acknowledgement that the status quo in respect to current governance arrangements should not remain and that a more collaborative approach to the governance of collaborative projects, where appropriate, could not only help to deliver organisational savings, but more importantly, also help to deliver improved outcomes for our communities

Therefore, in relation to offering a constructive way forward, I would like to invite you to engage, at the earliest opportunity, with myself and Eric to consider how best we could progress the collaborative agenda between our three organisations.

We would like this approach to be one that doesn't involve the wholesale change of governance but, instead, looks to build upon our good track record of collaboration between the three organisations to date and, at the same time, helps to develop appropriate governance arrangements for such activities based on the representation model.

Shropshire Fire and Rescue Authority

Introduction

This document sets out Shropshire and Wrekin Fire and Rescue Authority's (SWFRA) formal response to the consultation on the West Mercia Police and Crime Commissioner's (WMPCC) Initial Business Case (IBC). The response provides background and context to SWFRA's position and it identifies areas within the IBC where there is agreement and areas of grave concern. The document also sets out what SWFRA believe to be a far more practical way of moving forward that includes adoption of the "Representation Model," whereby the WMPCC joins the SWFRA, rather than the proposed "Governance Model," where the existing fire authority is abolished and the WMPCC takes on sole control and responsibility of both Shropshire Fire and Rescue Service (SFRS) and Hereford and Worcester Fire and Rescue Service (H&WFRS) alongside his existing responsibilities for West Mercia Police (WMP).

Background

Following the advent of the Policing and Crime Act 2017, the WMPCC decided to commission a team of consultants to develop a business case for the WMPCC to take on the role of governance for the Fire and Rescue Services that fall within the service area of West Mercia Police; these being Shropshire Fire and Rescue Service and Hereford and Worcester Fire and Rescue Service.

On the 29th March 2017 the Chair of Shropshire and Wrekin Fire and Rescue Authority, alongside the Chair of Hereford & Worcester Fire and Rescue Authority (H&WFRA) and senior officers from SFRS, H&WFRS and WMP were invited to attend a "Collaboration Workshop" at West Mercia Police (WMP) Headquarters. This initial workshop was followed by a number of meetings between Beckford Consulting and individual officers and the Chairs of the Fire Authorities. During this period SFRS, and the other services involved, willingly provided a considerable amount of financial, organisational and cultural information to the consultants in order for them to carry out their analysis with a full understanding of the organisations involved. This included a high degree of candour on the strengths and challenges of each organisation, along with the existing ambitions for greater collaboration.

Throughout this part of the process concerns were raised about:

- the likelihood of the process of changing governance diverting energy and resources away from core activity
- the risk of compromising any of the Services' existing reputation and "brand," thereby affecting their ability to effectively deliver their service
- the apparent democratic deficit that would arise from a move away from a governance model delivered by truly local politicians
- that savings on the scale being purported as achievable by the PCC could only be achieved by the wholesale outsourcing of all Fire and Rescue Service (FRS) support
- functions to the Police. This was immediately recognised as being impractical and not assured of achieving the best outcomes for the Service or the public. There were real concerns from the Chair of the FRA that by becoming nothing more than a very small stakeholder in a much larger operation, the outcome was likely to be degradation of the supporting services that currently appear to be far more integrated into everyday operations in a FRS than they do in other emergency services
- the original intention to discount the current governance situation as "no change," which was eventually amended to read "Sustain Current Trajectory" even though this didn't fully recognise the progress that had already been made towards the PCC being represented on the FRA.
- Throughout the process it was reiterated by all parties that there was already evidence to show a significant amount of collaborative activity was already taking place, both between each FRS and WMP, and there was enthusiasm and appetite for this to grow ever deeper and stronger. What the FRAs didn't believe, was that there was a need to go through the considerable upheaval of a change in governance to achieve this.

There was then a second workshop one month later on the 27th April 2017 when Beckford Consulting sent their findings out to a smaller group of senior officers and elected Members and it was these proposals that have subsequently gone on to form the Initial Business Case (IBC) that is now being consulted on by the WMPCC. It was clear that many of the views and ambitions had been incorporated into the IBC (indeed the idea of a stronger partnership between the two FRSs was gleaned from interviews with Chairs and senior officers from the FRSs) but the areas of concern had not been met i.e. where the proposed £4m in savings would come from and how the democratic deficit would be accounted for.

The WMPCC published his IBC for a 12 week consultation period to run from 12 June 2017 to 11 September 2017. Although this was eventually extended to 15th September 2017 at the request of the Leaders of the Constituent Authorities (CA), who requested a short extension to allow them adequate time to use their Scrutiny Committees to undertake an analysis of the relative merits of the IBC before the CAs could provide a considered opinion.

Early on in the consultation period, the Chairs of the Fire Authorities were asked by the Leaders of their relevant CAs to commission an independent analysis of the IBC. This was in order to undertake "due diligence" in what was recognised as a de facto "hostile takeover bid." This was to allow the Scrutiny Committees of the CAs to have some context and the ability to balance the evidence being provided to them. This was agreed to and a team from Ameo and Alendi Consulting Services were contracted to undertake an analysis (which is attached within this response as an appendix)

The Ameo/Alendi report was completed at the end of July. At an extraordinary meeting of the SWFRA on 1st August, it was agreed that this report was suitable to be put forward to the relevant CAs to support their Scrutiny Committees and that the report should form a substantive part of the SWFRA's response to the WMPCC IBC consultation.

During the consultation period, Members of SWFRA have also engaged with a number of key stakeholders. The purpose of this was to get full appreciation of the views of the public and constituents on the relative merits of what is seen as a proposal for a “once in a generation” change.

General Points

Throughout the process SWFRA have accepted and supported the idea that there is both opportunity and benefit from increasing the level of collaboration with both other emergency services and other organisations. SFRS has a history of working closely with partners, whether it be to deliver their front line service more effectively through intelligence sharing and joint delivery or to secure the best support services. The Service is recognised as being at the forefront of adoption of the Joint Emergency Services Interoperability Programme (JESIP), has delivered market leading improvement in Control Room resilience through a partnership with H&WFRS and Cleveland Fire Brigade, and adopts a best practice approach to sharing intelligence with both Telford and Wrekin and Shropshire Councils to target preventative work at those who are most vulnerable and at risk of fire.

SFRS, as one of the smaller standalone FRSs, has also evolved to be an adept and sophisticated commissioner of services; exploiting the market and existing partnerships to get the very best deals and services. Large parts of building, financial, treasury, legal, payroll, pension, occupational health, procurement and much of the IT infrastructure is already managed through contracts with other public sector partners and commercial organisations; vehicles, plant, equipment and clothing are all procured through framework agreements and maintenance is generally carried out through total care packages or partnerships, such as the one with WMP for light vehicles. It is only where a service is highly specialist or critical to our operation that it is maintained in-house – such as servicing and maintenance of the heavy fleet (fire engines), managing contracts or parts of ICT, HR, finance, technical services and planning and performance management, where these functions are time bound and critical to the operation of the SFRS.

Where SWFRA has been frustrated is in its endeavours to collaborate more fully and effectively with other emergency service partners. There has been no progress on valuable initiatives such as co-responding from West Midlands Ambulance Service (WMAS), despite direct approaches from SFRS and a regional approach from all five FRSs in the West Midlands. SWFRA believe this reticence to collaborate is actually putting the residents of the more rural areas of the West Midlands at greater risk.

SWFRA also feel frustrated at the pace at which progress has been made towards greater sharing of estates. Along with WMP, SWFRA are members of the Shropshire Strategic Estates Partnership and are partners in the “One Public Estate” bid. Along with representatives from WMP, we have enthusiastically entered into investigations to share facilities at several of our premises but to date have only achieved a very small scale initiative at Newport Fire Station. The urgent re-development of one of our primary fire stations at Telford has been significantly slowed as WMP have been determining how the collaboration might best serve their needs. This information is not necessarily put forward as an indication of a lack of will from WMP to collaborate more fully – more as an illustration of the current effectiveness of the WMP enabling services in delivering change across such a “broad canvas.” It is worth note that these are one of the “enabling services” that Mr Campion proposes should take on the additional responsibility for FRSs in West Mercia. To support this the Ameo/Alendi research found evidence that the current pace of progress was “less influenced by the commitment of the parties but (more) by the sheer volume of projects currently being undertaken within West Mercia.”

5 Point Analysis

The Ameo/Alendi report on their analysis of the WMPCCs IBC adopted the Treasury’s “5 Case” model for ease of referencing. This section will do likewise and provide further context and an explanation of some of the key issues in the IBC that are of concern to SWFRA.

i. Strategic – While both Police and Fire and Rescue Services have a shared interest in making our communities safer, the prisms through which both must view this are different. Both seek to protect the most vulnerable but the FRS approach is often more aligned to a public health agenda than one specifically of law and order.

FRSs have had considerable and unique success in reducing the demand on their services through a complex, yet targeted, approach involving initiatives such as lobbying for changes in legislation at one end, right through to delivering programmes of intervention with individuals with fire setting behaviour at the other. In between these two extremes are thousands of targeted home visits, extensive schools' education programmes and an intelligence led risk based inspection regime of commercial premises. All this leads to a particular relationship with the public that makes up the FRS "brand." There is real concern that this highly effective strategic direction for FRSs would be compromised once a single governing body was in place over police and fire which would quite naturally, but probably unconsciously, bias the operations of the Services to what is seen as the most pressing issue – i.e. the ever increasing demand on police capacity and the increase in recorded crime. Alongside this there is a genuine concern, from both SWFRA and its employees, that an overtly closer relationship with the Police, and the change to the FRS "brand" that would bring, might compromise the relationship the FRS officers currently rely on when delivering their operational service and accessing the most vulnerable members of the public. We are already seeing increasing numbers of firefighters being attacked while undertaking their duties. Again, this is not a criticism of the Police but a realistic recognition of the power public perception has on how effective Police and Fire Services can be in undertaking their different roles.

ii Economic – It was not made obvious in the PCC's IBC, but SWFRA were pleased to see from the Ameo/Alendi analysis that the existing combined costs for providing governance to the two FRSs was less than 20% of the costs of the OPCC. In addition to this stark difference in costs, it is clear to see that there are significant benefits in having governance for SFRS being provided by a committee of up to 17 Members, rather than one Commissioner who would have to cover a large police force and two Fire and Rescue Services. The benefits are in having diversity and challenge in decision making, capacity and local knowledge when engaging with communities and staff.

Looking beyond the costs of governance, the IBC purports to be able to make savings in the region of £4m. Within the IBC there is little to substantiate this figure and this has been one of the primary areas of contention for most stakeholders who have tried to analyse the case. Another factor is that Mr Campion himself has conceded in two public meetings that the £4m includes efficiencies totalling nearly £2m that already exist in SFRS's and H&WFRS's published Efficiency Plans and will be delivered regardless of any changes in governance. Discounting this apparent change of tack the Ameo/Alendi analysis points towards the only logical way of achieving the stated £4m as being firstly to rationalise management structures through a merged management team to cover both FRSs and then/also to have all the enabling functions currently carried out by FRSs (finance, HR, training etc.) subsumed into the police and effectively be delivered as a commissioned service. Whilst the FRA believes there is a high level of naivety in this proposal (probably brought about by the pace in which the original IBC was developed, leading to a lack of understanding of the operational or dual role many of our "enabling functions" have in providing incident command, mobilising and control and operational resilience functions) it has already been stated that SFRS has always been open to the idea and practice of outsourcing certain services – but always with the ability to exploit the market to get the best deal for the people of Shropshire. The IBC relies on a considerable restructure across the three organisations that will see the removal of all FRS enabling service costs (through removing over 100 posts), a further reduction of police posts in the region of 30 - 40 and all the work currently being undertaken by FRS staff being subsumed into this reduced police "enabling services" team.

It is also concerning that the actual costs of change, such as project management and redundancy, have not been factored in to the IBC. It is the view of SWFRA, who have had considerable experience and success in reducing the FRS budget over the last 5 years by £3.2m, that the proposed efficiencies of 25% are unrealistically optimistic; particularly when we are advised that the creation of the existing Warwickshire and West Mercia Police Alliance only managed reductions of "back room" costs in the region of 10%.

It should also be recognised that SFRS and H&WFRS currently only spend in the region of 12% of their overall budget on "enabling services" and governance, whereas WMP spends 21%. SWFRA believe this indicates there is some spare capacity, and opportunity for increased efficiency, in WMP but that doesn't require a change in governance or merger to exploit. SFRA again reiterates that it does support greater and more structured collaboration but it should be where improvements can be made in capacity, resilience and better outcomes for the public.

iii. Commercial – The commercial case in the IBC is confused and difficult to understand but seeks to address the strategic advantage of maintaining the “brand” and achieving political accountability.

It is clear from the reaction in the local press, in Members’ direct contact with their constituents, the views of parish and town councils and the views of the Trade Unions, that a move to the PCC taking over control of the FRS is an unwanted one and is seen as a move that changes the public perception of the FRS. There have been views publically expressed that Mr Campion is “empire building” or should perhaps “stick to the job in hand” with running the Police; but discounting this there are real concerns about an eventual reduction in firefighting resources in Shropshire.

With regards direct political accountability, SWFRA recognise that, following a legislative change to abolish Police Authorities, PCCs are indeed directly elected to serve their communities and govern police services. However there has been no such change for FRAs and Mr Campion was elected to run WMP and not the combined Police and Fire Services of West Mercia. It is Fire Authorities and their elected Members who have provided direct political accountability to the people of Shropshire since 1997 without complaint from the public. While it is true that Members of FRAs are appointed, it is also true that they are taken from a body of elected representatives who have a legitimate political mandate following elections that express the views in Shropshire of between 55% and 60% of the electorate. Unfortunately the same cannot be said for any PCC to date, with an electoral turnout in West Mercia of less than 21%. Perhaps the FRA’s views on this might be weakened if Mr Campion had included his intentions to assume the role of governance for SFRS and H&WFRS in his 2016 manifesto, and the electorate had been able to choose on that basis. As it stands SWFRA believes the people of Shropshire are not behind the IBC and a recent poll in the Shropshire Star, which elicited in the region of 1,200 responses, provided a staggering 78% return opposing the change of governance to the PCC.

The relatively modest costs of FRAs, as compared to the OPCC, has already been highlighted but what has not been recognised is the huge capacity for engaging with the staff and public that can be delivered through the 47 elected Members of FRAs. The Integrated Risk Management Plan (IRMP) is the guiding document for any FRA in improving public safety. It is a statutory duty on the FRA to consult broadly on the proposals within the IRMP and this is achieved, highly effectively, through the use of officers and FRA Members together.

As a consequence of this IRMPs are considered and measured documents that have consistently brought about improvements in safety and high levels of public satisfaction within ever decreasing budgets.

iv Financial – Concerns about the viability of the financial case have already been raised but there are more technical issues that appear to have had a lack of consideration, such as the impact on precepts and other funding when capital programmes and priorities start to become aligned. However, SWFRA does recognise this is not a problem that is specifically related to the change in governance being proposed and will arise with any progressive alliance between the two FRSs or WMP. However, it is believed that it is easier to maintain integrity in decision making and avoid conflicts of interest when the governing bodies are as separate as the budgets and funding streams.

v. Management – SWFRA are pleased to see that the IBC recognises that any change will require considerable leadership capacity to achieve the level of co-operation that any change demands. Indeed the IBC does not seek to achieve any reduction in posts or capacity until the new plans are fully embedded, with 2019 being indicated as the earliest date. The FRA also recognises that in any alliance there will be the opportunity to rationalise posts as more efficient ways of working are identified – although SWFRA believe that in some areas it will be better to harness the capacity that has been released to maintain momentum for change and improvement rather than simply make cuts. SWFRA’s primary concern here is that the IBC purports to maintain the three services as sovereign entities below the level of governance but the actual mechanics of the changes will deliver the contrary. Shropshire currently benefits from a local FRS, governed by local people and delivering a full service for its communities. It is clear that the outcome of the IBC will be something very different, with a governing body based in Worcester, and it is inconceivable that there won’t be an eventual migration of management there too. While there will always be benefits in seeking to share specialist resources and services, the outcome of implementing the IBC will be different and SWFRA

would worry that Shropshire's safety would then come far lower down in the priorities of any larger organisation or governance model. A change of focus and resource allocation is commonplace whenever emergency services expand to cover a larger area. This refocusing of priorities is entirely understandable in a new context but the reallocation of resources as budgets tighten over time would also be inevitable and to the detriment of areas with lower populations.

vi. Implementation – The major concerns in this area are around the absence of any reference to implementation costs in the IBC. This may be because there is an unrealistic suggestion that the change would be achieved through this new work being absorbed into the workloads of existing staff and managers, who are already dealing with other new burdens such as the introduction of the Emergency Services Mobile Communications Programme (ESMCP), the reintroduction of a long awaited inspection regime, existing collaborations around property, training and procurement, the new responsibilities already coming from the tragic events of Grenfell Tower and countless other smaller changes such as the apprentice levy and gender pay gap reporting; all this on top of the day-to-day business of providing a world class emergency service.

Findings

SWFRA are encouraged that the IBC is not overtly critical of the performance of the FRAs up until this time, and does recognise that significant collaboration already takes place between FRs, other emergency services and key partners. However the IBC does level implied criticism that greater collaboration can only be achieved through the PCC assuming governance. This is a flawed and inaccurate assumption with little to support it.

The task set to Ameo/Alendi was to undertake a full analysis of the viability of the PCC IBC and, in addition to this, consider its merits against an alternative way forward where the PCC became a full Member of each FRA as part of a review of the structures of the authorities and where a new partnership was created to build a strategic alliance between SFRS and H&WFRS, alongside striving for even greater and more effective collaboration with WMP. SWFRA believed this was a practical and achievable way forward and felt the momentum of collaborative change could effectively be governed by a strategic group of Members and officers that would include the PCC. Their finding was that all the efficiencies and operational benefits proposed by the IBC could be achieved through greater co-operation as described above.

Many of the respondents to the IBC consultation have complained that the "Representation Model" set out in the Policing and Crime Act had been overlooked or intentionally discounted by Beckford Consulting on the basis it was "business as usual" or "status quo" or eventually "Sustain Current Trajectory." Indeed several of the other PCCs (Gloucestershire, Sussex, North Yorkshire and Thames Valley) who have committed themselves to undertaking a review of assuming a governing role over FRs have already arrived at the decision that the "Representation Model" is the most relevant for them.

Both SWFRA and HWFRA have publically demonstrated their enthusiasm to work more closely with the PCC by inviting him to attend Fire Authority meetings and take part in deliberations. The only thing prohibiting the ability of the PCC from having full Member's rights is the need to change the legislation that constitutes each FRA and this is in the gift of the Home Office.

It is frustrating that more critical analysis of the proposed £4m of savings has not been possible because of the lack of information contained within the IBC. However SWFRA do believe that the analysis that was achieved by Ameo/Alendi is accurate and have grave concerns about the viability of these savings being achieved through the movement "en masse" of enabling services to the Police, and even more grave concerns that if this were to be done that SFRS would not continue to receive the high level of support it currently relies on.

SWFRA welcome Mr Campion's commitment that he will not undertake any changes that might negatively impact on front line operations but, with the best will in the world that can only be a "gentleman's agreement" with a short term applied to it. The evidence of 20 years of a locally led Service is clear to see, with SFRS continually improving its service and reducing the numbers of fires, deaths and injuries in the County. This has been brought about through the combined efforts of a 17 strong Fire Authority and a determined focus on the communities in Shropshire. At times, SWFRA has taken decisions that are at odds

with both local and national politics because they have been best for safety. That is what an effective local FRA brings. Unfortunately the PCC cannot quote such heritage or assure the security of tenure that allows long term promises to be made about Shropshire continuing to receive the level of service it currently does or that as Services combine their ambitions the needs of the less populated areas in West Mercia will continue to be as recognised as they currently are.

This is not a criticism of Mr Campion, it is simply a product of a political system and the natural behaviour of any organisation that grows to cover a larger area with limited resources.

Conclusion

FRA Members from Shropshire have been engaged in this process throughout and feel that the questions raised at the onset have not been answered. They have already seen considerable officer capacity diverted away from dealing with core activities; concerns about the “brand” being compromised have not been allayed.

The track record of SWFRA speaks for itself. It shows strong and decisive governance over the last 20 years whereas the change proposed in the IBC would bring about conflicts of interest and a democratic deficit. SWFRA have steered Shropshire through a very challenging period of financial hardship and they have delivered a Fire and Rescue Service for the communities of Shropshire that is both financially and operationally healthy. This experience leaves them highly sceptical that the scale of the savings suggested in the IBC can be made without severely compromising the effectiveness of SFRS. However SWFRA have been interested to note that in Mr Campion’s most recent presentations to the CAs he stated that, in fact, the £4m of savings predicted by the IBC actually include approximately £2m of savings already identified in published FRA Efficiency Plans. This makes the proposal for two successful organisations to go through the level of upheaval suggested in the IBC to be even more incredible; particularly when recognising that the anticipated level of savings is now less than 1% of their combined budgets.

Members might have been more assured if there had been enough detail available through the IBC or supporting documentation to allow a fuller analysis, but this has not been the case.

SWFRA do not agree with the PCC’s assertion that the only way to make sure the emergency services in West Mercia collaborate effectively is to move governance away from dedicated groups of locally elected representatives, to the hands of one person who will sit remotely and have their capacity stretched between three organisations and three counties. Fire and Rescue Authorities, even prior to the advent of any statutory duty, have a proud history of effective collaboration and the evidence already suggests that this will only continue to improve with the change in legislation.

SWFRA do recognise that after 20 years the time has come to consider a review of the structure and operation of the FRA but they would want to build on the success of the last 20 years, rather than dispense with it.

SWFRA also agrees that even more advantage should be taken of working with partners in the emergency services, but not to the exclusion of others when that makes more operational or commercial sense.

SWFRA strongly believe that a more practical and effective way to foster, drive and harness collaborative innovation is through a combination of a structural review of FRAs, inclusion of the PCC as described by the “Representation Model” and creation of a new, more formal alliance between the Fire and Rescue Services in West Mercia that will secure all the financial and operational benefits of being able to behave like a larger organisation, without any of the cost of becoming one.

In this way local Fire Services can be governed by local representatives who are able to work together where improvements, efficiencies or economies of scale can be achieved.

As such, SWFRA urge Mr Campion to take account of the views of the public, Shropshire, Telford and Wrekin, Worcestershire and Herefordshire Councils, staff representative organisations and those that have been charged with the successful governance of Shropshire Fire and Rescue Service for two decades and consider whether the most appropriate way forward would be the “Representation Model,” rather than the

one proposed in the IBC. SWFRA believe this to be a more progressive model that harnesses the combined energies of three organisations and allows for innovation to flourish in a truly collaborative environment and without conflict.

Consultation response from Herefordshire Council to the Police and Crime Commissioner's proposals on fire governance in the West Mercia area

Consultation question 1: The Police and Crime Commissioner is proposing to take on governance of local fire services in Herefordshire, Shropshire, Telford & Wrekin and Worcestershire. This would result in:

- Estimated £4 million annual savings through improved efficiencies.
- Closer collaboration between police and fire services.
- Improved resilience for ensuring public services.
- No changes to frontline officers or services
- A system of a directly elected Police, Fire and Crime Commissioner.

Do you support these proposals?

No. Not in their current form.

Consultation question 2: What are the main reasons for your answer to question 1?

Financial considerations

Response 1: Herefordshire Council is entirely supportive of enabling public services to work more efficiently and effectively together where there is a sound business case for doing so and the impacts on service provision are clear. However, the projected financial savings estimated by the Police and Crime Commissioner (PCC) of £4M per year through improved efficiencies appear to be somewhat misleading in their presentation. The PCC provided clarification during the presentation of evidence to Herefordshire Council's General Scrutiny Committee that the projected savings were not wholly additional but included those identified in the efficiency plans, which run through to 2020, for both Shropshire Fire and Rescue Service and Herefordshire and Worcestershire Fire and Rescue Service¹.

Response 2: The PCC has noted that under current proposals there may be an impact on some roles from across the four organisations affected (including Warwickshire Police through the alliance). The outline business case identifies that some 628 employees, 11% of the combined total, are employed in these areas which cover Chief Officers and their Deputies, Transformation, Alliance Working, Business Support and Estates, HR, Training, Transport, ICT, Strategic and Operational Planning, Legal, and Internal Audit. The PCC asserts that through consolidation of structures, integration, transformational process redesign and more effective use of information, this number can be reduced by around 25% to about 474 (or 8.5% of the combined total) over three years. By our calculation, this equates to 154 jobs in total.

There is no detail of what it would cost to reduce the workforce numbers in the PCC's initial business case. It is not possible, therefore, to know whether these costs have been taken into account in the projected £4M savings outlined by the PCC. The independent report commissioned by Shropshire and Wrekin and Herefordshire and Worcestershire Fire Authorities draws a similar observation. It notes that there is a lack of clear evidence to reconcile the declared savings with the options proposed without significant headcount reductions. They go further to note that any transition of this scale has transition costs, none of which have been stated in this business case.

¹ Herefordshire and Worcestershire Fire Authority efficiency Plan can be viewed [here](#) and Shropshire and Wrekin Fire Authority efficiency plan can be found [here](#)

Response 3: The independent report compiled on behalf of Shropshire and Wrekin and Hereford and Worcester Fire Authorities asserts that an area omitted from the PCC's initial business case is consideration of tax receipts and precepting. A concern had been raised about the 'normalisation' of precepts which would lead to an increase in the Herefordshire precept of around 10% with no identifiable increase in service level. In reply to a direct question in this regard, the PCC stated that there would be no change to the Herefordshire precepts as a result of this proposed change. Herefordshire Council welcomes this commitment; but recognises the potential for such an increase inherent in the proposal.

Service resilience.

Response 4: Herefordshire Council does not have full confidence in the PCC's initial business case. Concerns have been raised in the independent report for the fire authorities, that some of the staff identified by the PCC as potentially reducing by 25% may also have dual roles as frontline fire and rescue officers. Until further information is presented on this proposal in the more detailed business case, which the PCC will need to set out after the initial consultation period has ended, it is not clear as to the impacts on service resilience. Herefordshire Council notes with some concern that the more detailed business case is outside of the scope of this consultation.

Response 5: The proposed changes to governance represent a shift in representation from 42 locally based ward councillors on the two fire authorities, to the single PCC. Herefordshire Council questions whether service resilience across three large rural counties is best served by one individual as opposed to the current arrangements where local councillors, who have intrinsic knowledge of their local wards, can represent local community concerns very effectively. Herefordshire Council would also draw attention to the very low voter turn-out (20.7%) for the PCC election in 2016². Of the votes cast, the current PCC received 83,619 votes, equating to 60% of the total votes cast.

The PCC appears to acknowledge this weakness in his proposal in suggesting *"the adoption of advisory support to the PCC to ensure understanding of those things which matter to individuals and local communities."* He has invited leaders of the four top tier authorities to put forward suggestions to him of how this support might be provided; but as they remain unidentified the costs of any such arrangements remain unquantifiable.

Response 6: The PCC argues that abolishing Herefordshire and Worcestershire and Shropshire and Wrekin fire authorities would generate savings of £570k. Those savings, while acknowledged to be modest, would allow for more wide ranging reform and efficiencies to be made. These in turn would allow for greater prioritisation to front line services. The PCC asserts that this would strengthen resilience in ensuring Public Safety by all three organisations, principally through shared governance and maximizing joint working and collaboration. In addition, that new technology would offer potential for extending collaboration and many of the initiatives already in course of delivery will create potential for Police and Fire to function more flexibly and cohesively.

The PCC contests that he is better placed, as a directly elected individual, to drive through change, arguing more rapid progress could be made by focussing on the rationalisation of 'back office' staff while safeguarding the frontline services that the public value so highly. The fire authorities contend that the proposed rate of change would be damaging, the change of governance would be disruptive, un-costed and the collaborative working practices that are described as working well, placed under threat.

² Please see: <http://researchbriefings.files.parliament.uk/documents/CBP-7595/CBP-7595.pdf>

In hearing witness statements made by the PCC and the fire authorities, we have found a lack of compelling evidence to suggest that current collaborative efforts are a material barrier to maintaining transformative change. It seems to be an un-necessary risk to service resilience to make these changes now and with such haste.

Levels of collaboration

Response 7: Herefordshire Council would argue, from a neutral perspective, that a healthy relationship between the PCC and the fire authorities exists. This was asserted by both the PCC and the fire authorities to the general scrutiny committee. It appears to be a relationship where challenge and cooperation work constructively toward making the necessary reforms required to our frontline services.

A principal question Herefordshire Council remains un-convinced by is - why such a radical shake up is required? The PCC has stated that *'if any change were to arise from the exploration of this business case then shared development of that change and engagement and collaboration by all parties throughout the process would best support its implementation'*. Further that *'It is important to state that there is no criticism offered of the performance of the existing governance or organisations in their current form. We have not become aware of deficiencies in any dimension of their performance which would cause us to consider that there is a failure or risk of failure to overcome'*.

A further lack of clarity exists in regard to the 'barriers', noted in the PCCs initial business case, to further collaboration and cooperation. References to barriers are generalised in their context and rarely described in clear detail. Through hearing witness statements and responses to questioning, it is clear that significant common ground exists between the PCC and the FRA. The principle of closer working; co-location; joint and national procurement already being in place with fire and rescue authorities; rationalisation where appropriate, and a growing culture of 'blue light services' and 'support services' focused on prevention and public safety are a common and primary aim.

We draw the West Mercia PCC attention to the recent developments made by the Sussex PCC where strengthened collaboration between the police and regional fire services is seen as the most appropriate way forward. The Sussex PCC will maintain current governance structures without seeking to make changes to fire authority arrangements, a position proposed and evidenced by an independent review of current arrangements. The Sussex PCC and the fire authorities set out a [shared, open and honest agenda for transformational change](#).

Importantly, the Sussex PCC, sensibly, in our view, has built in a two year review period to assess how the current arrangement is working. With a new national inspection regime³ and scrutiny measures providing further assurances to the public that their frontline services are working as effectively as possible. We would argue that the arrangement Sussex PCC is developing presents less risk to disrupting and slowing the transformational change that both the fire authorities and the PCC are currently delivering in the West Mercia area.

Replacing the existing Fire and Rescue Authorities.

³ The Government is committed to establishing a rigorous and independent inspection regime for fire and rescue in England. These provisions will strengthen the existing (currently dormant) inspection framework provided for in the Fire and Rescue Services Act 2004 ("the 2004 Act"). The 2004 Act will be amended to enable fire inspectors to enter premises, obtain information, and undertake joint inspections with HM Inspectors of Constabulary. These provisions will put beyond doubt the powers of inspectors to access the information they need to undertake a robust examination of fire and rescue services including, if necessary, without services' consent.

The independent report compiled on behalf of Shropshire and Wrekin and Herefordshire and Worcestershire Fire Authorities asserts that, *‘capitalising on the limited risk associated with closer fire-to-fire collaboration can bring forward political and professional resources together to focus on a common goal. They suggest that ‘considerable progress can be made in exploiting opportunities without compromising democratic accountability’.*

Response 8: Herefordshire remains unconvinced that there is a strong case made by the PCC about the benefits arising from the replacement of the existing fire authorities. There is acknowledgment by the PCC that neither fire authority is a ‘failing entity’ and that both authorities, under proposed reforms, would retain their current identities. Furthermore, both authorities already work collaboratively and are subject to, for example, the same national standards of procurement to ensure financial efficiencies are realised. The current track record of the fire authorities in reducing fire incidence by 40% in the last decade appears to demonstrate a credible track record of delivering improvement to public safety.

Other – please specify

Response 9: Herefordshire Council is concerned with this consultation process in that, as a statutory consultee, we are being asked to comment on what we know to be incomplete information. The PCC has indicated that should he formally put his proposals forward to Government it will be accompanied by a more detailed business case. The PCC has not yet made a detailed business case available but it is clear that it will be outside of the scope of this consultation. In this regard, Herefordshire Council feels the consultation process is somewhat disingenuous. We believe the PCC is missing an opportunity to meaningfully engage and consult on current proposals. The risk of agreeing to these proposals as they stand is greater, in our view, than remaining with current operational practices.

Response 10: Assessing the strength of the PCCs initial business case against the government’s own tests.

- **Economy:** The PCC has not made a strong economic case for change based on the evidence presented. The claimed financial saving of £4m per annum is misleading – it includes financial savings committed to already by the fire authorities in their plans.
- **Efficiency:** A lack of clarity exists in this regard – we don’t believe a strong case has been presented for a more efficient ‘governance’ arrangement. The PCC has said this will be set out in the more detailed business case which has not been shared with statutory consultees. Without seeing the more detailed case, it is not possible to fully assess the benefits/dis-benefits of the PCCs proposals. Meanwhile, the fire authorities have put forward costed efficiency plans and the promise of continued collaboration on new initiatives coming forward.
- **Effectiveness:** The PCC initial business case suggested a directly elected individual is better placed to drive through change with a focus on rationalisation of ‘back office’ functions. This in turn would focus attention on supporting the frontline services that the public value so highly. The fire authorities contend that the proposed rate of change would be damaging, and the change of governance would be disruptive. It is acknowledge by the PCC that the present governance arrangements of the Fire and Rescue Services are currently effective.

Given these competing perspectives, we would argue that the arrangement the Sussex PCC is developing presents a more coherent way forward. This approach exhibits less risk to disrupting and slowing the transformational change that both the

fire authorities and the PCC are currently delivering in the West Mercia area, while also allowing for review periods to be built in to ongoing arrangements.

- **Public Safety:** On a purely practical level, Herefordshire Council would advocate that changing current governance structures should be secondary to the priority of extending wider collaborative working. For example, with local authorities, the ambulance service (which we appreciate the PCC is also keen to include in more collaborative working), healthcare providers, social care, social housing and other frontline agencies such as the Environment Agency. As a rural county, with an ageing population and with key areas prone to flood risk our health care systems, our flood management responses and housing increasingly need to consider public safety. Currently, the PCCs proposals make no mention of extending collaboration in these areas.

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John Campion
West Mercia Police & Crime Commissioner
Hindlip Hall
Worcester
WR3 8SP

Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
Shropshire SY2 6ND

Date: 12 September 2017

My Ref:

Your Ref

Dear John

West Mercia Fire & Rescue Governance – Consultation

Thank you for attending our Communities Overview Committee on Monday 4th September during which you presented the initial business case, supported by the more detailed work undertaken by Beckford Consulting, in which you are proposing to take on the governance of local Fire Services in Herefordshire, Shropshire, Telford & Wrekin and Worcestershire. I am now responding solely on behalf of Shropshire Council in my role as Leader having been given the mandate to do so at our Full Council meeting in the July 2017.

Cllr Cecilia Motley, Chair of this Scrutiny Committee has shared with me both the detail and the outcomes of the discussions held on Monday which I found extremely useful in enabling me to respond on behalf of Shropshire Council.

In summary, Shropshire Council does not support the proposals within the initial Business Case to change the governance arrangements for local Fire Services in Herefordshire, Shropshire, Telford & Wrekin and Worcestershire. Whilst Shropshire Council recognises that the consultation has been carried out against this initial Business Case, the feedback from the Scrutiny Committee is that the case for change lacks sufficient clarity and leaves a number of unanswered questions, principally that the £4.25m savings lack specific and coherent details behind them. As a result of this it has not been possible to understand the full benefits of the proposals compared to alternative options to further increase efficiencies by the Fire & Rescue Services, such as greater 'Fire to Fire' collaboration, as well as more collaboration with the other blue light services which would include greater sharing of accommodation. This decision has the support of opposition group leaders.

I know you mentioned the lack of involvement at this stage of West Midlands Ambulance Service, and we agree it would have made sense to look at this more holistically for all blue light services. Similarly, we are also aware through our involvement in the One Public Estate of the desire to further co-locate office accommodation, which I know is already taking place and developing across Shropshire and Telford.

We note that the financial savings are proposed to be around the enabling services (back office) although having considered the Report undertaken by Alendi Consulting (enclosed) we are also aware that a large number of those support staff are also retained fire fighters, which again causes us concern with regard to the impact it would have at the front line. We welcome your comments that front line activity would not be affected and that a local identity would remain; and can see a number of benefits within the overall proposals, particularly around data sharing and wider procurement opportunities building on those that already exist. However a number of these could be developed as previously stated by a remodelled governance structure such as Fire to Fire collaboration and I would urge you to explore this further in the short term.

Shropshire Council also has concerns about the proposed consolidation of services at Hindlip, and whether this would lead to a deficit in the north of the West Mercia area, impacting on the ability of Senior Officers to progress the high level cooperation that is already in place to deliver, amongst other things, emergency planning between Shropshire Council, Fire and Rescue Services and others.

The proposals also appear light in terms of the detail surrounding local engagement and understanding of how any new Fire Governance model would be scrutinised at a local level. We would have welcomed more explanation of the role of the 'small number of representatives across the counties' and how and whether they would relate to the proposed Police Fire and Crime Panel.

Having stated all of this, I do believe that this consultation has encouraged Shropshire Fire & Rescue and the other Fire Services to reflect on these proposals and the need for change and could have a beneficial impact, particularly encouraging different services to look positively at establishing new ways of working together to drive efficiencies, which I know you spoke of-with conviction at the Committee meeting.

To be clear, I regret to inform you that Shropshire Council rejects your proposals as drafted and consulted upon. We prefer the alternative approaches now being discussed which we believe will make the same efficiencies whilst delivering more robust and locally accountable governance. We acknowledge that you may well have boosted the urgency with which these alternatives will now be moved forward.

Thank you for the opportunity for Shropshire Council to respond to the proposals set out in the initial Business Case. I have attached a completed Consultation response form. As mentioned earlier, I have included the analysis undertaken by Alendi Consulting, which I would urge you to consider and take account of, when you are reviewing the consultation responses.

Finally, we look forward to hearing the outcomes of the consultation and working in a collaborative manner with you and your officers in the future.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Peter Nutting', with a stylized flourish at the end.

Peter Nutting
Leader

cc: Clive Wright – Chief Executive
Cllr Cecilia Motley - Chair, Communities Overview Committee
Nick Hurd MP – Minister of State for Policing & the Fire Service

WEST MERCIA FIRE AND RESCUE GOVERNANCE CONSULTATION

The Police and Crime Commissioner is proposing to take on governance of local fire services in Herefordshire, Shropshire, Telford & Wrekin and Worcestershire.

This would result in:

- Estimated £4 million annual savings through improved efficiencies.
- Closer collaboration between police and fire services.
- Improved resilience for ensuring public services.
- No changes to frontline officers or services
- A system of a directly elected Police, Fire and Crime Commissioner.

Q1 Do you support these proposals?

Yes ☐

No ☒

Q2. What are the main reasons for your answer to question 1? (Please tick all that apply).

Financial considerations ☒

Service resilience ☒

Levels of collaboration ☒

Replacing the existing Fire and Rescue ☐

Authorities

Other (Please Specify):

About You

Q3. In what capacity are you responding?

As an individual member of the community ☐ (Please go to question 6)

On behalf of a business ☐ Please go to question 7)

As an employee or volunteer of the police or fire service ☐ (Please go to question 4)

As a local councillor or on behalf of a local council ☒ (Please go to question 5)

Q4. Do you work for any of the following? (This can include in a voluntary capacity)

Hereford and Worcester Fire and Rescue Service ☐

Shropshire Fire and Rescue Service ☐

West Mercia Police ☐

Q5. Are you any of the following?

Town or Parish Councillor ☐ Unitary Councillor ☐

District / Borough / City Councillor ☐ County Councillor ☐

Providing an official response on behalf of the following Council

Q6. Please confirm your age

Under 18 ☐ 40 - 64 ☐

18 - 25 ☐ 65 and over ☐

26 - 39 ☐ Prefer not to say ☐

Q7 Please confirm which local policing area you live in (or are located in if you are responding on behalf of a business, organisation or a council)

Herefordshire ☐

Shropshire ☒

North Worcestershire: Bromsgrove, Redditch, Wyre Forest ☐

South Worcestershire: Malvern Hills, Worcester City, Wychavon ☐

Telford and Wrekin ☐

Other (Please specify)

THANK YOU FOR TAKING THE TIME TO TAKE PART IN THIS CONSULTATION.

Please post your completed questionnaire to:

John Campion, West Mercia Police and Crime Commissioner, Hindlip Hall, Worcester WR3 8SP

The closing date for the consultation is **Monday 11th September 2017**

Results will be published in due course on: www.westmerica-pcc.gov.uk

ameo:



Consulting Ltd.

Analysis of West Mercia PCC Initial Business Case

Version – Final Draft 1.1

26th July 2017

Authors: Mike Dearing,
John Bonney,

The content of this report is based on information (interviews & documents) gathered in good faith from contacts within Hereford and Worcester Fire and Rescue, Shropshire Fire and Rescue and the Office of West Mercia PCC. Ameo /Alendi Consulting cannot guarantee the accuracy of this content and therefore accepts no liability whatsoever for actions taken that subsequently prove incorrect.

1. Introduction

In line with the Policing and Crime Act 2017 the West Mercia Police and Crime Commissioner (WMPCC) commissioned research to develop a business case for merging the governance, strategic and operational management of Hereford and Worcester (HWFRS) and Shropshire Fire and Rescue Services (SFRS) into his jurisdiction. This initial business case (IBC) was recently completed and submitted for public consultation on 12th June 2017 to run for twelve weeks with a closing date of 11th September 2017.

Shropshire and Wrekin Fire and Rescue Authority (SWFRA) and Hereford and Worcester Fire and Rescue Authority (HWFRA) made initial press statements in response to the launch of the public consultation, in which they recognised the need for greater collaboration but were keen to highlight the effective collaborative ventures that were already in place and those that were planned. Both FRAs also pointed out that they were already well governed, well managed, and delivered an excellent service to their communities within budgetary constraints. The FRAs also questioned the IBC on its assertion that £4m of savings could be made without losing jobs or reducing the quality that both FRAs rely on to deliver their service to the public and staff.

The Chairs of the FRAs have been in discussion with the Leaders of their respective Constituent Authorities (CAs) to determine how the CAs need to be supported in order to develop a considered response to the PCC's consultation. NB: the statutory consultees are the CAs, the public, the staff and their representative bodies (RBs).

The decision of the CAs was that this role would be delegated to the scrutiny function of each council and to support this the Leaders of the four CAs requested the two FRAs prepare a report. To that end the two FRAs agreed to jointly commission an independent analysis of the PCC's IBC in order to scrutinise its feasibility and practical deliverability. Furthermore, it was felt important that the analysis should also appraise the IBC against alternative options; such as a revised FRA structure that would allow for PCC representation, create efficiencies within the governance arrangements and exploit the sharing of resources.

As well as a detailed review of the IBC produced by Beckford Consulting, the supporting material from the two FRS's was examined and a series of one to one interviews were conducted with the Chairs of the two FRA's, their respective Chief Fire Officers and heads of finance. In order to better understand the PCC's intended approach the authors also met with the West Mercia Police and Crime Chief Executive as the Police and Crime Commissioner was not available.

As such this report provides a financial and organisational analysis of the IBC, verification of details therein and an exploration of a number of potential options in response to the consultation for consideration by the two FRA's and their constituent authorities.

2. Overview and Assessment of Governance Options

The IBC approaches the governance options somewhat differently from the guidance provided by the Association of Policing and Crime Chief Executives (APACE) in that it does not consider the Representation model and focuses only on the Governance and Single Employer options. We presume this is because the PCC currently sits on both FRA's as a participating but non-voting member and this could be described as a variant of the representation model.

The lack of examination of the representation model may be a missed opportunity as a number of authorities are exploring the representation approach and developing innovative solutions to build strong working alliances without organisational disruption. We would suggest this might be an avenue for further exploration and provide more detail later in the report.

The IBC concludes that the current trajectory of collaboration and potential savings achieved under this arrangement would be accelerated by the adoption of a governance model. It cites that the removal of barriers around strategic decision-making as the main reason for this improvement. We offer evidence below that suggests that delays in collaborative activities may not be the result of existing governance structures but rather other organisational factors.

It is worth noting that the IBC limits suggestions that significant improvements in operational service delivery would be achieved through a change of governance. This we believe is wise. Both police and fire are category 1 responders under the Civil Contingencies Act 2004 and have statutory obligations to cooperate in identifying, planning and responding to emergencies. Both FRs are active participants in the Local Resilience Forum and work well with police and other category 1 responders. As such collaboration is both legally required and actively pursued within West Mercia. Additionally the Joint Emergency Services Interoperability Programme (JESIP) has ensured closer collaboration between services through nationally prescribed training and protocols for incident management. The use of "Resilience Direct" a shared database of operational information for first responders in West Mercia demonstrates the progress made in developing a stronger collaborative ethos. Hence it is unlikely that any change in governance arrangements would affect the current level of operational coordination and delivery at incidents.

In recommending the governance model as the preferred option the IBC posits that it represents many of the advantages of a joint employer model without the challenges of resistance from the representative bodies or the complexity and risk of organisational integration. In theory this looks attractive but the reality may be more challenging.

Much is made of the advantages of keeping three separate organisations managed by a “command alliance” (Later referred to as “joint command” in 5.4.5). What this actually means in terms of day-to-day leadership is not clear. There is no explanation as to whether the Chief Officers would act collectively across the three entities or whether there would be defined areas of jurisdiction. No mention is made of the process of corporate decision-making and whether this would incorporate veto arrangements. Whilst these are detailed points they are fundamental in understanding how the approach would operate.

With a shared back office, a concerted effort to introduce lean systems and combined governance the sense that individual organisations with separate brands could be maintained indefinitely seems unlikely. What is being proposed is a fairly complex organisational form in which responsibilities and decision-making would need to be carefully defined if it is to work efficiently and transparently.

Paragraphs 5.4.9 and 6.7.5 suggest that further transformation from the proposed model is likely to occur in the near term. Indeed it is makes clear that a review of the senior command teams would be expected after April 2019 “to begin to release any redundant posts and deliver the transformation plan”.

Hence what might appear as an initial model seeking to maintain three distinct organisations with separate leadership teams moves to something quite different with the individual Police and Fire and Rescue Service identities becoming increasingly less distinct. How well this is appreciated in the consultation process is unclear.

A key leg of the IBC argument is the purported improvement in accountability provided by PCC governance. It is worth noting that this relies on the belief that accountability is principally about the visibility of the decision making by a directly elected politician. However democratic accountability also encompasses issues of independent scrutiny and public accessibility. Currently both FRA’s are comprised of elected members appointed to the Authority rather than directly elected as the PCC. However the scrutiny arrangements operated by PCC’s is more limited than the infrastructure in place for each FRA, both of which have dedicated scrutiny bodies. In contrast to Police and Crime Panels, whose purview and authority is

narrow, FRA's scrutiny/performance committees are charged with greater discretion and influence.

It is also worth noting that FRA's are comprised of local representatives who offer the public a route by which to raise issues and concerns. In contrast, the WMPCC would be expected to deal with not only fire issues across two large counties but also the challenges of governing West Mercia Police whilst remaining open to local public concerns. The suggestion that this would cause "...a little extra work..." for the PCC seems highly optimistic.

That said the issue of community accessibility is clearly recognised in the IBC as it raises the concept of an advisory panel to the PCC. It is not clear how these unelected advisors would be appointed nor the formal authority they would hold. Neither is it clear whether these would be paid positions which would have financial implications and raise questions around independence. Whatever the case the argument that PCC's bring greater accountability through this model is open to challenge.

3. Five Case Analysis

The IBC adopts the Treasury's "five case" model in line with APACE guidance. For ease of cross-reference we have adopted the same structure (including a sixth section around implementation).

i. Strategic

This section lists three key strategic opportunities that are presented by the adoption of the governance model.

Acceleration of collaborative working in front line services

It is clear from the outset of the IBC that there is a somewhat narrow view of the work of FRS. The emergency response role and the focus on "community safety" are interpreted to align closely with the police role. At a high level, this may seem to be the case but more careful organisational examination reveals police and fire roles are considerably different. It is not without some significance that in no other Western country are police and fire jointly managed in this way. Much more prevalent is the combination of fire and emergency medical services. Police, quite rightly, focus on crime and law enforcement and so the overlap with fire service operations is limited. And whilst the Police including West Mercia have crime prevention as a significant function it remains a subsidiary activity. The fire service on the other hand is legally required not just to respond but prevent incidents as part of its integrated risk management plan (IRMP) and its natural partners in reducing vulnerabilities to fire are those that share similar risk drivers. These tend

to be local government, health and social care agencies rather than just police. An example of this is the current chairmanship the HWFRS CFO holds as part of the "Connecting Families" initiative. This multiagency approach seeks to work with complex families to address their social, health and welfare issues in a coordinated way. This does involve police but is also heavily influenced by the education, health and welfare priorities of the families.

Therefore, by moving under the governance of the PCC there may be a risk that "community safety" becomes more defined in terms of crime than fire related vulnerability. This may not be deliberate but given that fire, is less politically contentious, the focus is likely to be on the more vexed issues of crime related risk. Clearly this is conjecture but it is telling that nowhere in the IBC is it recognised that health and care agencies are key partners to HWFRS and SFRS which is an unfortunate omission.

The success of both fire and rescue services is typified by the declining rates of fires (in both services all fires have reduced by more than 40% in the last decade) much of which has been achieved by working with those that share the drivers of community risk. Understandably the public and political attention given to law and order may mean that a PCC focussed on three organisations rather than one will prioritise attention and resources to prevention in areas of crime and policing. It is worthy of note that within both FRS's preventative activity is one of three strategic areas of work. In West Mercia police structure "Protecting Vulnerable People" is one of seven units within the protective services division, which is itself one of 5 divisions. Hence the relative organisational visibility of preventative activity is quite different. Therefore, it is recognised that in any ongoing collaboration there would be merit in the WMP exploiting the fire services expertise in reducing demand.

Our examination of both FRS's on-going projects shows an extensive range of collaborative initiatives. The breadth and volume of these projects is impressive not just with police but also with other key public bodies. Work with local authorities and social care agencies in relation to the Safe and Well programme is making an increasing contribution to the wider health and wellbeing agenda. This is particularly noticeably in SFRS where the unitary authorities represent the key partners for the service's preventative work. In Hereford and Worcester, the sharing of assets with West Mercia police is occurring at Bromsgrove, Hindlip, Hereford, with plans for co-locations at Wyre Forest, Peterchurch, Tenbury, Bromyard, and Worcester. These premises are being used by a variety of frontline and specialist staff all of which builds operational synergies between the organisations. A similar situation is found in Shropshire where the sites of Newport, Whitchurch, Bridgnorth and Telford have or plan to have shared occupation. The suggestion that this work would be accelerated and deepened by a transition to the PCC maybe

underestimating the work already in train and overestimating the capacity of all partners to take on more projects. Notably all this work has been achieved through the current separate but cooperative governing bodies. Indeed, both FRS's and the Police have a strategic commitment to actively pursue partnerships to achieve their mission.

In our research we found evidence to suggest that the pace of progress is less influenced by the commitment of the parties but by the sheer volume of projects currently being undertaken within West Mercia Police. The strategic alliance with Warwickshire police has a number of very significant projects including a major overhaul of information systems which consume considerable resources and attention. Add to this the projects to share the Police HQ at Hindlip with HWFRS, the establishment of a shared operational command centre and various site sharing opportunities means the police's ability to meet the fire partners' ambition is already stretched.

For the two fire services, what may represent a more fruitful and immediate approach to saving costs and driving performance is to increase fire-fire collaboration; something which has not progressed to the same degree as the fire services have been focusing on seeking and achieving substantial efficiencies internally. Here we consider there are opportunities to bring together training resources, fleet management, ICT support, mobilising control capacity and specialist resource deployment across the two FRS's. Experience shows that intra industry collaboration is often a more straightforward and speedy means of gaining efficiencies, capacity and resilience than tackling the added complexities of the divergent needs and protocols found across sectors. Here the recent establishment by both FRSS of dedicated posts to identify and exploit joint opportunities is an important step to progressing shared projects across the two FRS's.

Enabling Services

Under the current governance arrangements, the different organisations have progressed a range of shared service initiatives. These have been with a variety of public partners depending on the financial and operational benefits that are available. By way of example SFRS receive some enabling services from Shropshire Unitary Authority – this organisation arguably has greater scale economies than WMP. It will therefore be important to do a clear like for like comparison between existing service costs and future service charges from any new shared arrangement.

We are not aware of any specific shared opportunities that the current governance has blocked. Moreover, as noted above, we are aware that consideration of

sharing some operational assets has been protracted due to decision making by PCCWM.

Reference is made to procurement economies, but there is no reference to where these are anticipated to be made. The majority of the external spend for a FRS is typically in operational assets and a number of national frameworks already exist which increase buying power of such equipment. Recent developments within the fire sector has seen all FRSs commit to national procurement frameworks for Training, Clothing, Vehicles, ICT, Professional Service and Equipment. The intention being that services benefit from national economies of scale rather than creating local procurement arrangements. As such whilst there are likely to be some common procurement categories between fire and police, the higher value categories will see greater synergies with other fire partners.

ICT exploitation

Considerable reference is made in the IBC to the crucial role of ICT provision and how sharing information holds the key to increasing effectiveness and generating financial efficiencies. What is not specified is exactly how these would materialise across the three organisations only that they would emerge. We have no doubt there is an important contribution to be made by collaborative ICT investment and assimilation but as to the extent of the savings and operational improvements no judgement can be made because of the scant information. As to the suggestion in 6.2.6 that the seamless sharing of data across organisation boundaries” ...on its own is sufficient to necessitate new governance arrangements” seems overstated given the lack of detailed benefits analysis.

Whilst the benefit of data sharing between police and fire is well made and is already established with HWFRS, this should not be seen in isolation. As explained above key partners for fire are health and social care agencies and often it is their data which is most valuable in fire risk analysis. Noticeably for both Hereford and Worcester and Shropshire FRS NHS data forms an important component of their risk intelligence.

ii. Economic

The economic case for transferring governance to the PCCWM is a central theme of the IBC. Given £250m of public money is involved we would have expected some significantly more robust analysis to be presented to inform appropriate decision making. The financial information offered to justify the benefits is very high-level and doesn't readily reconcile with existing budgets. As such we have not been able to recreate headline numbers to accurately validate them – where we have tried they appear overstated. For example, the governance costs appear to be overstated by over £300k (the two FRA budgets total £272k vs “combined

direct governance costs...amount to around £577k) – we could assume that Chief Officers have been included in this figure but they are operational and also included elsewhere risking double counting (see below). The headline figures are further complicated by referencing additional organisations in some areas and overstating the current costs.

As with all public services there is a cost of democracy and it is noted that the cost of the two FRAs is less than 20% of the cost of the PCCWM and his office – the current year budget for which is over £1.4m (excluding grants). We would anticipate that there are opportunities to streamline these structures, but given the different service remits we would anticipate that greater benefits would be available from FRA to FRA collaborations.

Beyond governance the IBC suggests significant savings through consolidation of enabling services – a figure of £4m is quoted. The figures suggest that creating the combined entity would see the removal of all enabling service headcount of the FRSs (in excess of 100 posts) and further reductions in the shared police team. This appears extremely challenging and impossible to achieve in short to medium term without incurring substantial transition costs

Little evidence is again provided and on face value these figures appear optimistic. Whilst caveated in relation to committed cost reductions no allowance appears to have been made for this. It would be helpful to have a clear summary of the savings/benefits and where they will be derived. From the information provided in the IBC and FRS budget information we would be concerned that the term “enabling” has been misinterpreted. It would appear that “enabling services” include Chief Officers, frontline command support, training officers, control staff and other senior staff who provide operational cover. As an example, in Shropshire half of the enabling services staff are operational staff (63 posts) – so including these in the 25% reduction would result in a reduction in front line staffing.

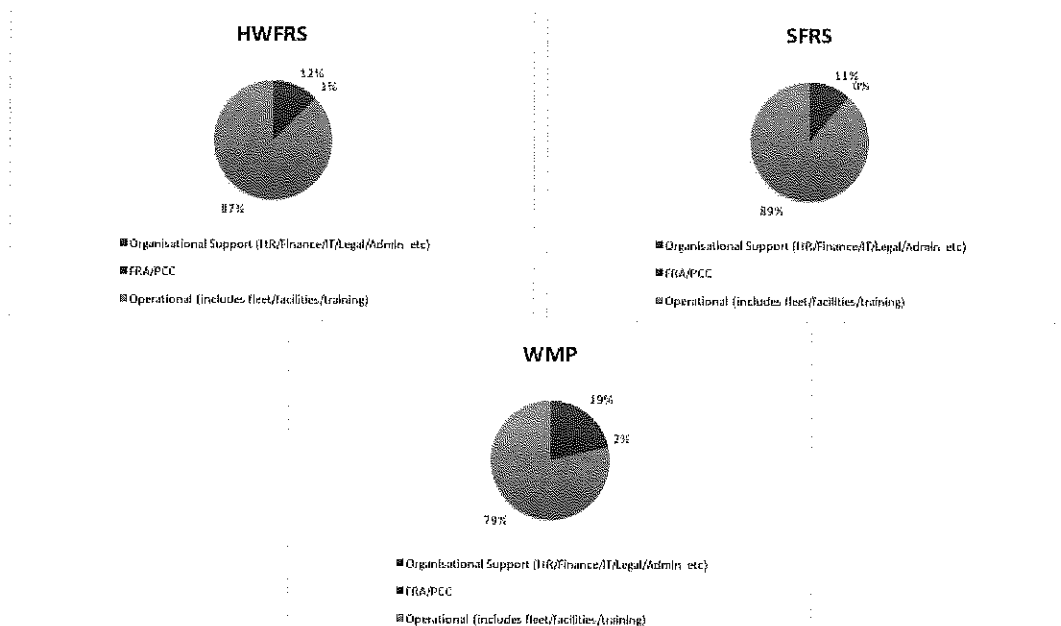


Figure 1 – Budget split by governance, organisational support and operational service delivery (including operational support)

Whilst the assertion that changing governance will deliver efficiency in enabling services is not evidenced, we do believe efficiency in this area can be delivered. When considering the enabling resources in the two FRSs there would appear to be some opportunities to deliver efficiency through fire-to-fire collaboration. We are aware that the two FRSs are already exploring such options in HR and ICT and we would encourage this to be extended across all support functions. The synergies will be much greater in a fire-to-fire scenario and could be delivered at lower cost.

The transition costs of the change are not clearly articulated and it is difficult to establish what they are given the lack of clarity over the model. Whilst the IBC recommends a change in governance, the main financial benefits suggested derive from headcount reductions in enabling services (including Chief Officers in 2019). Given the limited information presented on the end-state and timescales we would expect to see transition costs relating to: Redundancy, pension strain and/or relocation costs; these are likely to run to a seven-figure sum given staff numbers involved. We also anticipate, given the emphasis on the introduction of new systems to reduce costs that a considerable training burden would be created. Our experience elsewhere is that reskilling to use new/multiple software can be time consuming and expensive, no costings have been shown for this.

The reality of fire and emergency incidents means that FRS's, unlike many public services, are risk driven rather than demand led. This means that even in areas of infrequent incidents a level of cover is required to manage any risk that may arise. Delays lead to a greater severity of risk be that a growing fire or escalating Hazmat incident. Hence HWFRS and SFRS both set response target times and deploy their

resources to maximise a rapid response even in relatively low risk areas. The IBC 5.2.7 argues the success of fire and rescue services in reducing calls means maintaining cover is harder to justify. This assumes a demand led approach rather than the reality of FRS operations. Moreover, the success of the two services is a result of using the capacity within their current resources to sustain prevention activities and so drive down risk. Were these resources to be removed or reduced significantly then experience shows that frequency of incidents begins to climb.

iii. Commercial

The IBC does not make any clear commercial case and relies strongly on efficiency opportunities – although they appear to be police efficiency rather than fire. Given both FRSs are continually striving for efficiency we would suggest Fire-to-Fire collaboration looks likely to be able to deliver greater returns. Based on the limited financial analysis we have been able to review it would appear that the commercial case is for percentage budget reductions as opposed to a change in governance.

We are unclear how the change can be argued to sustain local input when the current model of governance has 42 elected member representatives from across the region holding the Chief Fire Officers to account. The adoption of advisory support to the PCC is not explained either in financial or democratic terms.

iv. Finance

The existing transformation plans that SFRS and HWFRS have in place are noted. Both organisations have a track record of delivering savings and have plans through to 2020. As a detailed implementation plan has not been provided within the IBC it has not been possible for these to be overlaid to understand the additionality and/or lost opportunities.

One area that is omitted from the IBC is consideration of tax receipts and precepting. Although in the proposed single governance model the two FRSs are to remain separate services it is assumed that their investment priorities will be aligned and this is likely to require a normalisation of revenue. Given that priorities have not been set it is not possible for us to comment on how this will fall, however normalisation could potentially increase the council tax precept for residents of Herefordshire and Worcestershire by 10%.

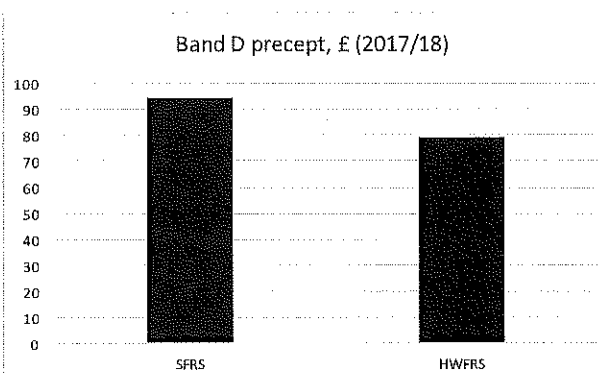


Figure 2 – Comparison of Band D fire precept for 2017/18

v. Management

The IBC rightly points out that to deliver the joint governance model of a WMPCC amounts to a major transformation project. The suggestion that to reduce strategic capacity early in the project would be unwise given the volume of work involved and the need for clear and visible leadership we believe is undeniable. The suggestion that the three chiefs need to demonstrate “a unity of energy and direction” is also well made. Given the issue of the capacity and attention being consumed by the WM/Warwickshire strategic alliance there is a danger that an additional transformational project may outstrip the project resources available. Whilst this may be mitigated by additional project and programme support the clear risk lies in the limited additional strategic capacity to achieve the programme whilst continuing to deliver vital public services.

From what we can see it appears that the case is heavily underpinned by transformation of existing structures within PCCWM and WMP releasing capacity to support the FRSSs. If significant scope for transformation exists currently then why these opportunities have not already progressed is unclear. As an example enabling services at WMP appear to cost 19p in the pound, whereas for the two FRSSs this figure is around 11p. The cost of corporate services at WMP appear significantly higher than both the FRSSs even when normalised to account for different organisational scale (see below chart normalised by headcount which is typically a key cost driver for enabling services). If we just focus on the costs of governance the IBC makes several references to reducing cost by suggesting that redesign of the PCCWM support structures can deliver £110k at the same time as increasing their functions. We would be interested to understand what has prevented the PCCWM progressing these efficiencies before now.

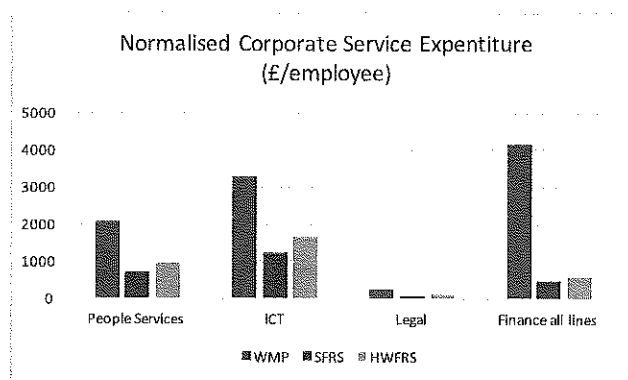


Figure 3 – Comparison of main components of corporate service expenditure for WMP, SFRS and HWFRS

vi. Implementation

In the governance section of the IBC it is suggested that one of the drawbacks of pursuing the single employer model is the likelihood of resistance from representative bodies. Recent formal resolutions from the Fire Brigades Union make it clear that the union will resist any change in the governance of Fire and Rescue Services. Therefore, the suggestion of avoiding employee relations issues through

a governance rather than a joint employer model seems unlikely. Additionally, the stated future ambition to review Chief Officers in 2019 leaves the door very clearly open to a merger of the forces and further potential industrial relations issues. This would have significant repercussions for any transition timetable.

We would expect a more robust assessment of the options as part of any subsequent stage. It is our understanding that a Full Business Case will be completed in four (4) weeks after the consultation closes in order to submit it to the Home Office in October. This seems an impossible timescale to complete the required engagement with professionals to develop the options and undertake a comprehensive assessment of the risks.

4. Opportunities and Options Going Forward

As the IBC makes clear the proposals for change infer no criticism of the current governance arrangements or performance of the organisations. Indeed the report catalogues a whole range of collaborative initiatives established between the two FRSs and West Mercia Police. The contention that this collaboration would be accelerated and deepened by the new governance arrangements is questioned in our analysis. We consider that the transition costs and the impact on local accountability would be more significant than stated. Moreover the savings anticipated through a reduction in governance costs and back office rationalisation risk being overstated and are likely to be diminished by the increased costs of the OPCC and the considerable resource required to effect transition.

As such the four CAs and the FRAs should consider requesting a copy of the financial analysis that underpins the £4.25m saving that the IBC identifies. This will ensure that they are able to make an objective assessment of the benefits and disbenefits of change for those they represent.

Notwithstanding this the aims of the IBC to rationalise enabling services and achieve better use of front line assets through collaboration have real merit. There is no doubt that these represent an important means of ensuring future financial stability and service improvement. However we suggest that in moving forward the police should be one of a number of significant partners for the two fire and rescue services.

There is increasing evidence that FRS's and their constituent authorities are developing new models of collaboration and partnership to meet financial and service challenges. Strategic alliances not unlike that established between West Mercia and Warwickshire police have begun to emerge in the fire sector. These

exploit the synergies between FRS's and capitalise on their shared mission and delivery models. Furthermore, a single fire voice in a region would be more credible and influential amongst other public-sector partners. We consider this is a model to be explored across Shropshire, Telford and Wrekin, Herefordshire and Worcestershire Authorities.

Reducing the size of each FRA (currently across the two authorities there are 42 elected members) and creating a combined alliance board to drive greater collaboration between the two services is likely to realise financial benefits quickly and rationalise governance costs. There are gains in terms of economies of scale whilst ensuring continued local accountability, visibility and scrutiny. Creating a shared integrated risk management plan across West Mercia develops a more strategic view of risk in the area and creates greater resilience because of a larger resource base to meet local demand. Such an arrangement also creates a fire entity coterminous with West Mercia Police and more aligned with other regional bodies such as the ambulance trust and Environment Agency.

As we document there are also a variety of areas where the two services could gain efficiencies by working more closely. The recent appointment by both services of collaboration officers needs to be capitalised upon and potentially taken further by considering a number of shared posts.

We would suggest that appropriate representation from the PCCWM and WMP are invited to join any alliance board established by the two FRAs. This will help to maintain the momentum of the current collaborative work across the two fire and rescue services and WM police. As the IBC makes clear any transformational change requires determined political and professional leadership. Whilst this option is more straightforward than the Joint Governance model proposed it still requires sustained commitment from elected members and heads of service. Substantial change will reap rewards but only through hard work and political will. We consider that an initial three-year plan needs to be formulated and agreed by the board with the aim of achieving clear collaboration targets by 2020.

5. Conclusions

As both the IBC and APACE guidance makes clear a transfer in governance of a Fire and Rescue Service is a significant and far reaching decision. The nature of emergency service work also means that maintaining the delivery of service during any transition and sustaining it thereafter is a matter of huge importance. In light of this the use of an initial business case, which by its very nature is limited in detail, in a public consultation is surprising. Our examination of the report has highlighted the need for greater clarity particularly around the financial

assumptions being made. Given the financial and economic case is a significant leg of the argument for change we consider the accounting assumptions as a minimum need to be disclosed. It is our understanding that a Full Business Case will be completed in four (4) weeks after the consultation closes which seems an unrealistic timeframe to consider the outcomes of the consultation and re-engage where necessary in order produce a robust and accurate appraisal of the options, benefits and importantly risks.

As we make clear we have been unable to reconcile the declared savings with the options proposed without significant headcount reductions. Moreover any transition of this scale has transition costs none of which have been stated in this business case. As such it has not been possible to ascertain the net savings or analyse the viability of the investment needed for change. Without proper analysis we consider there is an unquantified risk in such a change. In making alternative proposals we have examined the opportunities for financial savings whilst capitalising on the limited risk associated with closer fire-fire collaboration. Experience shows that where political and professional resources are focussed on a common goal considerable progress can be made in exploiting opportunities without compromising democratic accountability.

Glossary

APACE – Association of Policing and Crime Chief Executives

CA – Constituent Authority

FRA – Fire and Rescue Authority

FRS – Fire and Rescue Service

HWFRS – Hereford and Worcester Fire and Rescue Service

IBC – Initial Business Case

PCCWM – West Mercia Police and Crime Commissioner

RB – Representative bodies

SFRS – Shropshire Fire and Rescue Service

WMP – West Mercia Police

Mr John Campion
Police & Crime Commissioner
West Mercia
Hindlip Hall
Worcester
WR3 8SP

Councillor Shaun Davies **Leader and Cabinet Member
for Neighbourhood Services &
Pride Programme**

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Tel: +44 (0)1952 383220
e-mail: shaun.davies@telford.gov.uk

Contact: Cllr Shaun Davies

Our Ref: SD/clr

Date: 19 September 2017

Dear Mr Campion

Following your three month consultation proposing changing governance arrangements for local fire services in Worcestershire, Herefordshire, Shropshire and Telford & Wrekin, I requested the Council's cross party Customer, Community & Partnership Scrutiny Committee to review the information in the consultation and provide a recommendation to Cabinet on whether or not Telford & Wrekin Council should support the proposals.

The Scrutiny recommendation is not to support your proposal to take on governance of local fire services in Herefordshire, Shropshire, Telford & Wrekin and Worcestershire for reasons of financial and service resilience, and replacing the existing Fire and Rescue Authorities. A copy of the report is attached.

We feel collaboration between Shropshire & Wrekin and Hereford & Worcester Fire & Rescue Authorities and other public bodies be encouraged to continue.

Based on this recommendation Telford & Wrekin Council will not be supporting your proposal.

Yours sincerely



Cllr Shaun Davies
Leader of the Council

Enc

C.C
Mr Nick Hurd MP, Minister of State for Policing and the Fire Service
Rod Hammerton, Chief Fire Officer at Shropshire Fire and Rescue
Cllr Eric Carter, Chair of the CFA
Cllr Kuldip Sahota - TWC
Cllr Nigel Hartin - SCC

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TELFORD & WREKIN COUNCIL**CABINET – 14 SEPTEMBER 2017****WEST MERCIA FIRE AND RESCUE GOVERNANCE PROPOSALS****REPORT OF THE CUSTOMER, COMMUNITY & PARTNERSHIP SCRUTINY COMMITTEE****1. PURPOSE**

- 1.1 In June 2017, the West Mercia Police & Crime Commissioner (PCC) launched a three month consultation proposing changing governance arrangements for local fire services in Worcestershire, Herefordshire, Shropshire and Telford & Wrekin. The proposals focussed on the PCC's preferred option for the PCC to take on the roles of two local Fire Authorities (Shropshire & Wrekin and Hereford & Worcester), with the aim of improving local police and fire services and achieving £4m savings.
- 1.2 As a result, Telford & Wrekin Council's Leader requested Scrutiny to review the information in the consultation and provide a recommendation to Cabinet on whether or not Telford & Wrekin Council should support the proposals.

2. RECOMMENDATIONS

- 2.1 **The Customer, Community & Partnership Scrutiny Committee RECOMMENDS to CABINET that:-**
- (a) **the proposal for the Police and Crime Commissioner to take on governance of local fire services in Herefordshire, Shropshire, Telford & Wrekin and Worcestershire not be supported for reasons of financial considerations, service resilience, and replacing the existing Fire and Rescue Authorities; and**
 - (b) **collaboration between Shropshire & Wrekin and Hereford & Worcester Fire & Rescue Authorities and other public bodies be encouraged to continue.**

3. BACKGROUND

- 3.1 The Customer, Community & Partnership Scrutiny Committee is a politically balanced scrutiny group of seven elected Members and two co-optees. The Committee is responsible for scrutinising key Council services including housing, environmental services, community safety and enforcement.
- 3.2 The PCC's proposals have been enabled by legislation which is part of central Government's agenda to bring about closer working between emergency

services and improve the way in which they serve communities, protect the public and provide value for money for taxpayers. The PCC's proposals consider three options to meet these aims: (a) maintaining the status quo; (b) single employer; and (c) joint governance. The PCC's proposals reject both options (a) and (b) and recommend (c) as the preferred option (ie joint governance).

- 3.3 The statutory consultees to the proposals are the constituent authorities of each Fire and Rescue Authority (FRA), the public, staff and their representative bodies.
- 3.4 Both Shropshire & Wrekin and Hereford & Worcester FRAs are currently well respected and are not failing, as is the case in other areas where a PCC is taking over the governance of an FRA. In fact, Shropshire & Wrekin FRA is one of the top 5 performing FRAs in the country.
- 3.5 The Committee extends thanks to the following individuals who participated in this review:-
 - Mr J Campion, Police and Crime Commissioner
 - Rod Hammerton, Chief Fire Officer
 - Councillor E J Carter, Chair Shropshire & Wrekin Fire & Rescue Authority
 - Councillor K Sahota, Main Opposition Group Leader Shropshire & Wrekin Fire & Rescue Authority
- 3.6 The Committee are grateful to the PCC for kindly extending his consultation period to 15 September 2017 to allow sufficient time for a recommendation to be made to the Cabinet and for Cabinet to make a formal response.

4. METHODOLOGY

- 4.1 The PCC's consultation document including the initial business case (IBC) was circulated to the Committee on 7 July 2017 in preparation for review by the Committee.
- 4.2 The Committee met on 17 July 2017 to formally receive the PCC's proposals and to hear from the Chair and Main Opposition Group Leader of Shropshire & Wrekin Fire & Rescue Authority (FRA). Members present were: Councillors G C W Reynolds (Chair), J C Ashford, C N Mason, L A Murray, J M Seymour and B D Tillotson.
- 4.3 Following a question and answer session, the Committee considered that further information was required to enable them to reach a recommendation and agreed to meet as a working group on 3 August 2017 to receive the FRAs' Independent Consultants' report (the 'Ameo/Alendi Consulting report') and agree the Committee's recommendation to Cabinet.
- 4.4 The Ameo/Alendi Consulting report was circulated to Members of the Committee on 2 August 2017 following its endorsement by the Shropshire & Wrekin FRA at its Extraordinary General Meeting on 1 August 2017.

- 4.5 On 3 August 2017 Members met with the Shropshire & Wrekin FRA Chief Fire Officer (CFO) to receive the Ameo/Alendi Consulting report and engaged in a question and answer session on points of clarification. Members present were: Councillors G C W Reynolds (Chair), J C Ashford, C N Mason, L A Murray, J M Seymour and D Johnson (Co-optee).
- 4.6 The following Members declared interests in this review: Councillors C N Mason and L A Murray, and Mr D Johnson (co-optee).
- 4.7 These recommendations have been made unanimously by those Members present on 3 August 2017.

5. KEY INFORMATION CONSIDERED AND THE COMMENTS OF THE COMMITTEE

Financial Considerations

- 5.1 The PCC's proposals include the creation of a Fire Alliance which it is claimed would realise significant savings through working together to deliver efficiencies of £4m. The PCC stated that this was not a target.
- 5.2 The PCC's proposals suggest that savings can be made from governance, and from sharing common services such as ICT and HR.
- 5.3 The Police and FRAs have different precepts and the PCC pointed out that he was not proposing a merger and that these financial resources would not be used across services.
- 5.4 In his verbal evidence, the PCC suggested that a forensic examination of the savings figures was not possible at this early stage due to the limited nature of the IBC and the fact that the PCC was not the employer of FRA staff.
- 5.5 It was reported that Shropshire and Wrekin FRA has a good track record on making savings, with a budget that is fixed and safe until 2020, offering a well run authority with protection for appliances and no compulsory redundancies.
- 5.6 The CFO indicated that the Shropshire & Wrekin FRA currently enjoys an ability to outsource/contract out services (eg payroll) which enables exploitation of the market. Although it is acknowledged that there may be some benefits from larger resources and economies of scale under the PCC's proposals, this flexibility should be safeguarded.
- 5.7 The Ameo/Alendi Consulting report states that the consultants were "unable to reconcile the declared savings with the options proposed without significant headcount reductions."
- 5.8 **The Committee, therefore, considers that the ability to deliver the savings seems to be uncertain. Although the PCC has stated that the savings are not a target, on balance there does not seem to be sufficient**

evidence to demonstrate that they could be made as described. The Committee is, therefore, concerned that if the proposed savings cannot be made as stated, they would be delivered either through other means which may adversely impact service delivery (ie as a result of redundancies or loss of buildings/appliances), or result in an increase to the precept.

Service Resilience

- 5.9 FRAs provide a risk driven service, rather than a demand led service such as that provided by the Police. This means that a certain level of cover is required to manage any risk that may arise, even when the level of incidents is perceived as low. Delay in deploying resources increases the severity of risk and it is therefore important that FRAs maintain resources at a level which maximises a rapid response.
- 5.10 The IBC assumes that the success of FRAs in reducing calls means that it is hard to justify maintaining staffing at the current levels and proposes that savings can be made by service efficiencies within what is termed 'enabling services' through consolidation of services across both FRAs and the Police. However, due to the risk led service provided by Fire & Rescue services, the Committee do not support this assumption.
- 5.11 Furthermore, although there seems to be some confusion about what constitutes 'enabling services', it is the Committee's understanding that a significant number of Officers working within these areas have a dual role which includes some operational or training duties. For instance, the CFO explained that he is also a 'Gold Commander' and his deputies are 'Silver Commanders'. This dual functionality, together with the recruitment of retained fire fighters, enables the Authority to operate at an optimum level whilst also offering additional operational (service) level cover which enables a rapid response in times of increased risk. This would not be possible in the event that these Officers were lost through the efficiencies identified by the PCC's proposals and would result in a reduction in frontline staff.
- 5.12 **The Committee, therefore, concludes that the proposals to make savings from enabling services would reduce the resilience of the service.**

Replacing the existing Fire & Rescue Authorities

- 5.13 Existing governance arrangements at the two FRAs include the appointment of 42 elected Members. Appointments are subject to political balance rules and, therefore, the cross-party views of a wide range of the community can be represented and direct accountability to the public is provided for. However, it is acknowledged that Members of Shropshire & Wrekin FRA operate a non-partisan approach.
- 5.14 At the current time, the PCC enjoys a seat on both the FRAs but does not have voting rights, although this may change in the future. The Ameo/Alendi

Consulting report assumes that this is the reasoning behind the 'representation model' (which appears in guidance issued by the Association of Policing and Crime Chief Executives) being an option missing from the IBC.

- 5.15 Locally based elected Members are well placed to develop their existing good knowledge of the needs and requirements of the local area, with those appointed to the Shropshire & Wrekin FRA making visits to Stations on an annual basis. The CFO reported that relations between the Shropshire & Wrekin FRA and both operational staff and those working within enabling services was good; staff understand what the Authority does and know who their Members are.
- 5.16 Whilst the PCC argued that the local community also plays a part in the election of the PCC and he is, therefore, also a community representative, since his administrative base is in Worcester, the Committee considers that the PCC is not as directly accessible as local Ward Councillors.
- 5.17 If governance is transferred to a single political candidate, with a wider geographical remit and with the challenge of governing both West Mercia Police and two FRAs, the voice of local people may be lost or at best diminished. This is particularly pertinent at a time when emergency services are dealing with increasing challenges following the Grenfell Tower tragedy and terrorist attacks in Manchester and London.
- 5.18 **The Committee, therefore, concludes that the proposals risk a loss of control and influence of locally elected members and this could lead to reduced services with less local accountability.**

Levels of Collaboration

- 5.19 The PCC's consultation document seeks to build upon and accelerate existing collaboration between the two FRAs and the PCC noted in his verbal evidence that the Police could learn lessons from the FRAs' preventative activities.
- 5.20 It is noted that Shropshire & Wrekin FRA shares (or plans to share) premises with the Police at a number of sites and these methods of making efficiency savings should be considered before more dramatic transformation.
- 5.21 The Committee were also advised that the Police and Shropshire & Wrekin FRA are developing a localised missing persons search protocol and there are further cross-over services which allow a degree of collaboration between various services which give value for the pound and continue to make the area safer.
- 5.22 The Committee was extremely pleased to hear about the collaborative work which is already taking place between the two FRAs and with other public services, including local authorities and health and care agencies. It is noted from the Ameo/Alendi Consulting report that the pace of collaboration may not

be hastened by a change of governance, since this is influenced by the sheer number of collaborative projects underway.

5.23 The Committee found no merit in the PCC's proposals, especially within the context of a well-performing FRA, and welcomes current efforts at collaboration and encourage this to be continued.

6. BACKGROUND PAPERS

- West Mercia Police and Crime Commissioner West Mercia Fire and Rescue Governance Consultation Pack - June 2017
- Aneo/Alendi Consulting Limited Analysis of West Mercia PCC Initial Business Case – 26 July 2017

Report prepared by Deborah Moseley, Democratic & Scrutiny Services Team Leader, 01952 383215, deborah.moseley@telford.gov.uk and endorsed by the Customer, Community & Partnership Scrutiny Committee.

Date: 14 August 2017

FINANCIAL IMPLICATIONS

The Shropshire & Wrekin Fire and Rescue Authority is a separate legal entity which receives funding via the precept it levies on tax payers in the Borough, a precept which is collected as part of the Council tax bill. Therefore, there are no direct financial implications to the Council arising from the implementation of the recommendations of this report.

LEGAL IMPLICATIONS

The new provisions in the Policing and Crime Act 2017 enable PCCs to take on responsibility for the governance of local fire and rescue services where a local case is made.

Where the PCC wishes to take on the responsibilities of a FRA, they must develop a proposal that demonstrates it is in the interests of economy, efficiency and effectiveness, or in the interests of public safety.

The PCC has to consult with the relevant local authorities and people in the PCC's police area, and publish their response to the consultation process. Where there is agreement to the proposal from the relevant local authorities, it will be considered by the Secretary of State who may make an order to give effect to the proposal.

Where local agreement does not exist, the Secretary of State must obtain an independent assessment of the proposal, any representations made by the relevant local authorities, and the summary of views expressed by the people in the police

area. The Secretary of State must have regard to that independent assessment before making an order to give effect to the proposal.

Where an order is made the Police and Crime Panel will have its responsibilities extended to provide scrutiny for fire functions and will be renamed the Police, Fire and Crime Panel.

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Mr J Campion,
West Mercia Police and Crime Commissioner,
Hindlip Hall,
WORCESTER,
WR3 8SP

18 September 2017

Dear Mr Campion,

**West Mercia Fire and Rescue Governance – Consultation Response from
Worcestershire County Council**

I am writing on behalf of Worcestershire County Council as statutory consultee to respond to the consultation on proposals for fire and rescue governance.

At its meeting yesterday, 14 September, the Council unanimously resolved as follows:

- (a) The Police and Crime Commissioner be advised that Worcestershire County Council does not support his proposals and is particularly concerned that only an initial business case has been provided to the Council as a statutory consultee;
- (b) The proposals do not provide evidence that would be in the interests of improving public safety or the economy, efficiency and effectiveness of the service; and
- (c) The Council encourages the Police and Crime Commissioner to work with the Fire Authorities, and engage with the upper tier authorities, to achieve greater collaborative arrangements.

Simon Geraghty
Leader of the Council

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Electoral Division
Riverside

Thank you for agreeing to let the Council submit its views today, which I recognise is after the formal closing date for responses.

If it helps, I also attach a short Appendix which provides a summary of some of the member comments which were noted from the Council debate.

Yours sincerely



Simon Geraghty
Leader of the Council

Appendix

Points raised at Council on 14 September 2017 concerning PCC proposals for governance of Fire and Rescue functions:

- Lack of clarity in the financial and economic case, particularly in relation to the £4m savings, which are unsubstantiated
- No detailed business case provided
- Representation model not explored
- It was unrealistic to expect the Police and Crime Panel to take on scrutiny of fire governance.

Hereford & Worcester Fire Brigades Union Response to the Consultation on
the
Initial Business Case considering the governance of
Shropshire Fire and Rescue Service
and
Hereford and Worcester Fire and Rescue Service
by the
West Mercia Police and Crime Commissioner

The FBU is the democratic, professional voice of firefighters and other workers within fire and rescue services across the UK. We represent the vast majority of wholetime (full-time) and retained (part-time, on-call) operational firefighters and control staff across the UK.

The FBU opposed the inclusion of the ability for PCC's to take over fire governance during the debate and consultation on the Policing and crime Bill (now act), there was no public demand and no mandate for the change.

PCCs were first elected in 2012 and most recently in May 2016. Public engagement in the elections has been dismal on both occasions (West Mercia turnout 2016 20.7%, 2012 14.5%) when account is taken of simultaneous local council elections in 2016 this is poor.

The success of the PCC model of governance of Police Services across the country remains unproven and to allow its expansion to fire seems hasty and ideologically driven.

There is little evidence that the introduction of PCCs as replacement for a Police Authority has led to efficiency in governance or protected the numbers of front line police officers. There has been a 7% reduction in Police Officers since 2012 (160 warranted officers across West Mercia since the introduction

of PCC) West Mercia is currently 25th of 43 Police Forces (England & Wales) for numbers of officers per 100,000 population.¹

Since 2012, 70 Wholetime Firefighters posts have been lost, there is currently a crewing proposal consultation which will see the loss of a further 7 Wholetime Firefighter posts. The upshot of this that HWFRS will have lost 41% of its Wholetime Firefighters in just 5 years.

HWFRS had 184 Wholetime Firefighters in 2012, it will be left with just 107 Wholetime Firefighters if these latest cuts are agreed.

Due to the extent of the cuts to HWFRS in recent years, staff in HWFRS faced the real threat of compulsory redundancy. This was avoided due to FBU Members taking secondment opportunities in other FRS's and raft of voluntary redundancies and early retirements.

HWFRS FBU believe that if there are further cuts to be made then the senior management structure of this Service must be reviewed to see what savings can be made from a restructure of HWFRS senior management.

The PCCs Draft Business Case gives no reassurance that further cuts to front line staff can be avoided.

The most recent Home Affairs Select Committee report² into PCCs states *"The introduction of PCCs has worked well to date and has had some beneficial effect on public accountability and clarity of leadership in policing. However, this reform is still relatively new and understanding its impacts is still a work in progress. Any expansion of the PCC role needs to be incremental and carefully judged."* This would lead us to believe that bypassing the representation model and moving straight to governance is a step too far too soon and should be given much more serious consideration. With the Policing and Crime Act 2017 making collaboration a mandatory duty on Fire, Police and Emergency Ambulance Trusts there is no artificial barrier which can be maintained by any party. The representation model expanded to allow an appointed FRA member to sit on Police and Crime panels as a reciprocal arrangement could deliver all of the proposed benefits of the governance model without any of the implementation risks. The FRA should give consideration to reducing the costs of governance whilst maintaining democratic representation.

During the PCC election the public were given no indication of John Campions plans to take on fire governance in his official election literature.³

How can the PCC claim that he has any mandate for assuming governance?

No PCC was elected as Policing, Fire and Crime Commissioner. If the joint governance bid is successful, in order to achieve a genuine mandate John Campion should stand down and seek re-election as PFCC, this would remove any suspicion that the merger was engineered as a power grab or some kind of empire building exercise and give the new PFCC a full term in which to achieve the stated aims

Whilst the FBU maintains its position that the PCC governance model is not the right way forward for the Fire & Rescue service, we recognise the reality of the situation and the possible outcome of the consultation. On that basis we make the following points:-

NJC role maps, terms and conditions

The National Joint Council for Local Authority Fire and Rescue Services (the NJC) is the body responsible for agreeing the national framework of pay and conditions for wholetime and retained firefighters and fire control staff. It consists of 28 members appointed by the representative bodies of the employers and employees and each side is free to bring proposals to negotiations.

The NJC has an excellent record of progressing vital industrial relations matters. This includes the pay award process; ongoing work on terms and conditions; a fitness agreement; implementing the part-time workers settlement agreement; amending the Grey Book sections concerned with maternity, childcare and dependency; and the Grey Book sections relevant to health, safety and welfare.

The NJC has also been working on five significant work streams to transform and bring genuine improvement to the fire and rescue service:

- Environmental challenges flooding, inland water safety, snow, wild fire
- Emergency medical response: co-responding, falls, on-site trauma care, provision of community training
- Multi agency emergency response (MTFA): joint working, any issues falling out of JESIP

- Youth and other social engagement work: arson reduction, working with risk of offending youth groups
- Inspections and enforcement: schools, illegal homes, crown properties, expansion of unregulated business use, related fire safety advice.

Bringing these work streams to fruition through the NJC will undoubtedly improve the service to the public whilst progressing firefighters' conditions of service. This is a 'win-win' programme of change, underlining the virtues of a national system of employment relations.

National bargaining provides stability, is cost-effective, strategic and efficient, providing both the necessary competence and capacity that cannot be reproduced locally. Our members also value the national arrangements for negotiating their pay with five out of six (87%) indicating they were in favour of a national pay structure in a recent YouGov survey of firefighters organised by the FBU.

It also makes strategic sense given that the demands on and operations of the service are not limited by administrative boundaries. Firefighters cross borders on emergency calls every single day and carry out work in areas covered by other fire and rescue services. Major incidents requiring large number of firefighters from many services are a regular occurrence. In these circumstances, national bargaining arrangements through the NJC provide a mechanism for addressing terms and conditions issues for sound organisational and operational reasons. They reduce costs by avoiding the unnecessary duplication and ensure that firefighters facing the same risks at incidents enjoy broadly the same conditions of service.

The FBU seek a firm commitment that, in the event of a transfer of governance, our members will continue to be employed on NJC terms and conditions and role maps, the PFCC will seek representation at NJC level and representative bodies will be afforded a seat on the PFCCP.

The Single Employer Model

The FBU is very concerned that a single-employer model, with increasingly integrated police and fire services including combined senior management, common complaints and conduct systems, and joint support services, would seriously undermine the firefighting profession.

Stakeholders from both the fire and police services have expressed concern that a single employ model does not serve their own organisations best interests or those of the wider public

Although the FBU Recognise that your business case recommends the Governance model we have concerns that this is just a precursor to full integration.

The FBU seek a firm commitment that you will not seek to introduce a single employer model.

Non-warranted policing activities

Firefighters are dedicated professionals who provide an independent, humanitarian service. Operational and organisational independence from the police is a red line.

While the Policing and Crime Act maintains the ban on serving police officers working as firefighters, many PCCs have been eager to emphasise that there is scope for firefighters to undertake non-warranted police activities, such as work with vulnerable people, particularly around issues relating to mental health, which take a substantial amount of police time. In some parts of the country, firefighters are exploring police community support officer (PCSO) work.

The FBU seek a firm commitment that you will maintain firefighters' operational independence from the police, and that firefighters will not be compelled to undertake police community support officer (PCSO) work.

Establishment, crewing, pumps and stations

Since 2010, the government has reduced central funding for fire and rescue authorities in England by over 30%. As a result, 11,000 frontline firefighters have been lost, 40 stations have closed and scores of appliances have been removed.

Fire and rescue services have downgraded their fire cover through the introduction of day crewing/plus and reduced night cover, lowering establishment and minimum staffing levels and replacing second pumps with targeted response vehicles, all of which diminish the service to the public. As a result, emergency response times are at a twenty year high.

How quickly firefighters arrive at the scene and how many resources are available can be the difference between a life and death. Financial savings must not come before public safety. It is imperative that fire and rescue services are properly funded, with resources determined by risk, not cost.

The FBU seek a firm commitment that you will maintain Hereford & Worcester Fire and Rescue Services' current establishment as a minimum initial requirement. This level is inadequate anyway and we seek a commitment to returning to the levels required to ensure local and national resilience to fire and other emergencies.

Efficiency savings

The government's austerity agenda has resulted in the police service facing similar unprecedented budget cuts. The FBU is concerned that under a shared governance model, fire service resources could be used to prop up ailing police forces. Although the legislation ensures police and fire services will continue to receive separate funding, there is still room for budget flexibility on shared and joint costs.

The FBU seek a firm commitment that the cost of joint ventures will be apportioned fairly, reflecting the usage use of each service, and that any efficiency savings achieved from the fire and rescue service will be reinvested in fire and rescue service front line staff and resources.

Privatisation/Mutualisation

The Fire and Rescue Service has witnessed creeping privatisation in many areas. Personnel, estates, training and frontline equipment including fire engines, have been handed over to the private firms seeking to make a profit out of the Fire Service. It is always claimed that this is a more 'efficient' way to operate but too often this proved not to be the case as epitomized by the scandalous FiReControl PFI contracts and the disastrous experience with AssetCo in London.

We have also seen examples elsewhere of privatisations which have completely failed, forcing the state to step in with a public bail-out. The failure of Metronet on the London underground is just one such example.

These examples highlight how the privatisation of emergency services is a dangerous and flawed policy. Local communities cannot afford to rely on the commercial success or otherwise of a private firm to ensure that they have fire cover. The only sensible and safe policy for the Fire and Rescue Service is that it remains firmly in the public sector.

The FBU seek a firm commitment that Hereford & Worcester Fire and Rescue Service frontline, operational personnel and resources, will remain in the public sector.

Control Rooms

Despite the government's assurances that the police and fire service will remain operationally distinct, several PCC have mooted merging police and fire controls and employing joint call handlers.

Fire control operators are uniformed personnel and an integral component of the fire and rescue service. They are dedicated professionals with an in-depth specialist knowledge of fire control and command, trained to provide life preserving advice to members of the public trapped, and determine what resources to mobilise to fire and rescue incidents.

Police control operators have a very different culture (non-uniformed) and call handling procedures with a separate role for call handlers and dispatchers.

The FBU seek a firm commitment that Hereford & Worcester Fire and Rescue Service control staff will continue to be employed on NJC terms and conditions and adhere to nationally negotiated role maps.

Use of Fire Service Premises

Aside from the savings in governance it appears that there is to be a radical review of the police estate in order to release capital and make greater use of fire services premises with the assumption that this is desirable and productive. We have grave concerns that a permanent police presence on fire stations may have an adverse effect on community use of those stations. Many community groups and charities which make use of the community facilities on fire stations work with the most vulnerable members of the community, asylum seekers from more authoritarian parts of the world for example, who may feel uncomfortable using a facility with an overt law enforcement presence.

Further we foresee a significant risk of reputational damage to the fire service if identified as an arm of law enforcement.

The FBU seek a commitment that community facilities and the neutrality of the fire service will not be compromised in the shared estate or in wider collaboration measures.

References

1 House of Commons Library Briefing Paper Number 00634, 14 June 2017 Police Service Strength

2 House of Commons Home Affairs Committee, Police and Crime Commissioners: here to stay, Seventh Report of Session 2015-16, March 2016

3 PCC Candidate Election Leaflets 2016 <https://www.choosemypcc.org.uk/area/west-mercia>

Regards

Steven Gould

FBU Brigade Secretary HWFRS

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Shropshire Fire Brigades Union response to the consultation on
the
Initial Business Case considering the governance of
Shropshire Fire and Rescue Service
and
Hereford and Worcester Fire and Rescue Service
by the
West Mercia Police and Crime Commissioner

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Introduction

The Fire Brigades Union (FBU) is the democratic, professional voice of Firefighters and other workers within Fire and Rescue Services (FRS) across the UK. We represent the vast majority of wholetime (full-time) and retained (part-time, on-call) operational Firefighters and Emergency Fire Control staff across the UK.

The FBU opposed the Government's Policing and Crime Act which passed legislation allowing Police and Crime Commissioners (PCCs) to take over governance of Fire and Rescue Services. The union argued that there was no demand and no mandate for such a change.

PCCs were first elected in 2012 and again in May 2016 with dismal turnout both times from voters. In West Mercia, voter turnout was just 14.5% and 20.7% respectively, despite the elections last year coinciding with local council elections, which theoretically should have increased much greater participation. The FBU believe this reflects the lack of public awareness about the role PCCs play. Consequently, the demand for PCCs to govern fire services cannot be assumed to have any democratic legitimacy.

In responding to the PCC's Initial Business Case (IBC), this document gives our position first on the possible change of governance in the context of the recent direction of the Fire and Rescue Service. And secondly, in the event of SFRS governance falling under the PCC, our concerns for the future running of SFRS.



Initial Business Case

Capacity/Efficiency

The success of the PCC model of governance of police forces across the country remains unproven and to allow its expansion to fire seems hasty and ideologically driven. The Initial Business Case claims it will be able to achieve £4 million efficiency saving without affecting frontline posts or service delivery. Having experienced severe cuts since 2010, we are very sceptical of this claim.

There is little evidence that the introduction of PCC's has led to efficiency in governance of Police forces nor protected its front line officer numbers. In fact, there has been a 7% reduction in West Mercia since 2012. (160 warranted officers have been cut from West Mercia since the PCC assumed governance in 2012). West Mercia is currently 25th of 43 police forces in England and Wales for the number of officers per 100,000 population.¹

Indeed Shropshire Fire and Rescue Service's (SFRS) emergency operational response can in no way be regarded as extensive in comparison to most other Fire and Rescue Services (FRS). This has meant that use of resources in Shropshire has historically had to be extremely efficient and effective resulting in SFRS being consistently recognised as one of the most efficient FRSs in the UK. Despite that low base, SFRS has had to endure a swathe of cuts to its operational response, even though David Cameron had promised, at Carlisle Fire Station on the eve of the 2010 general election, that Austerity would not lead to frontline cuts.

SFRS has completed a cycle of Integrated Risk Management Planning (IRMP) from 2010 to 2015 under the project "Public Value" and is currently undertaking the second cycle of IRMP under the "20:20" project. Under Public Value, cuts amounted to a reduction of 52 operational posts⁴ broken down below:

- 40 Firefighter posts (20 Retained and 20 Wholetime)
- 5 Watch Managers
- 6 Station Managers and
- 1 Brigade Manager

The exact level of cuts introduced by 20:20 is of course subject to further review and intervention. However, one Area Manager post has already been deleted and changes to the wholetime duty system (WDS) is likely to reduce



the operational establishment by a further 12 Firefighter posts. This has meant that the Service has had to begin planning for circumstances where minimum crewing for the 5 immediately available fire engines may not be achieved.

We also know that Austerity cuts to Hereford and Worcester Fire and Rescue Service (HWFRS) has left it underfunded and therefore understaffed too. Therefore, claims within the IBC consultation that an estimated further £4 million can be cut is, at the very least, unrealistic. **It is certainly evident to us that all three services require investment. Investment to fulfil their minimum service delivery targets rather than further cuts.**

Governance

The most recent Home Affairs Select Committee report² into PCCs states: *“The introduction of PCCs has worked well to date and has had some beneficial effect on public accountability and clarity of leadership in policing. However, this reform is still relatively new and understanding its impacts is still a work in progress. Any expansion of the PCC role needs to be incremental and carefully judged.”*

This would lead us to believe that bypassing the representation model and moving straight to governance is a step too far, too soon and should be given much more serious consideration. With the Policing and Crime Act 2017 making collaboration a mandatory duty on Fire, Police and Emergency Ambulance Trusts, there is no artificial barrier which can be maintained by any party. The representation model, expanded to allow an appointed FRA member to sit on Police and Crime panels as a reciprocal arrangement, could deliver all of the proposed benefits of the governance model without any of the implementation risks. The FRA could also give consideration to reducing the costs of governance whilst maintaining democratic representation.

During the PCC election the public were given no indication of John Campion’s plan to take over fire governance in his official election literature.³

How can the PCC claim that he has any mandate for assuming governance?

No PCC was elected as Policing, Fire and Crime Commissioner (PFCC). **If the joint governance bid is successful, in order to achieve a genuine mandate John Campion should stand down and seek re-election as PFCC.** This would remove any suspicion that the merger was engineered as a power grab or

some kind of empire building exercise and give the new PFCC a full term in which to achieve the stated aims.

Consultation

The FBU are concerned that the consultation is taking place over a holiday period which could lead to less public engagement in the process. **We would like to see an extension of the deadline if the responses to the consultation are not representative of a wide cross section of West Mercia communities. We would also like to see the full publication of the responses and a breakdown of the statistics.**

The Single Employer Model

The FBU is very concerned that a single-employer model, with increasingly integrated police and fire services including combined senior management, common complaints and conduct systems, and joint support services, would seriously undermine the firefighting profession.

Stakeholders from both FRSs and Police forces have expressed concern that a single employer model does not serve their own organisations best interests or those of the wider public.

Although the FBU recognise that the IBC recommends the governance model, we have concerns that this is just a precursor to full integration.

The FBU need a firm commitment that you will not seek to introduce a single employer model.

Future of SFRS

Whilst the FBU maintains its position that the PCC governance model is not the right way forward for the fire and rescue service, we recognise the reality of the situation and the possible outcome of the consultation. On that basis we make the following points with regard to our main concerns for the future of SFRS

NJC role maps, terms and conditions

The National Joint Council for Local Authority Fire and Rescue Services (NJC) is the body responsible for agreeing the national framework of pay and conditions for wholetime and retained Firefighters and Fire Control staff. It consists of 28 members appointed by the representative bodies of the employers and employees and each side is free to bring proposals to negotiations.

The NJC has an excellent record of progressing vital industrial relations matters. This includes the pay award process; ongoing work on terms and conditions; a fitness agreement; implementing the part-time workers settlement agreement; amending the Grey Book sections concerned with maternity, childcare and dependency; and the Grey Book sections relevant to health, safety and welfare.

The NJC has also been working on five significant work streams to transform and bring genuine improvement to the fire and rescue service:

- Environmental challenges flooding, inland water safety, snow, wild fire
- Emergency medical response: co-responding, falls, on-site trauma care, provision of community training
- Multi agency emergency response (MTFA): joint working, any issues falling out of JESIP
- Youth and other social engagement work: arson reduction, working with risk of offending youth groups
- Inspections and enforcement: schools, illegal homes, crown properties, expansion of unregulated business use, related fire safety advice.

Developing these work streams through the NJC will undoubtedly improve the service to the public whilst progressing Firefighters' conditions of service. This



is a 'win-win' programme of change, underlining the virtues of a national system of employment relations.

National bargaining provides stability, is cost-effective, strategic and efficient providing both the necessary competence and capacity that cannot be reproduced locally. Our members also value the national arrangements for negotiating their pay with five out of six (87%) indicating they were in favour of a national pay structure in a recent YouGov survey of Firefighters organised by the FBU.

It also makes strategic sense given that the demands on and operations of the service are not limited by administrative boundaries. Firefighters cross borders on emergency calls every single day and carry out work in areas covered by other FRSs. Major incidents requiring large number of Firefighters from many services are a regular occurrence. In these circumstances, national bargaining arrangements through the NJC provide a mechanism for addressing terms and conditions issues for sound organisational and operational reasons. They reduce costs by avoiding unnecessary duplication and ensure that Firefighters facing the same risks at incidents conform broadly the same conditions of service.

The FBU seek a firm commitment that, in the event of a transfer of governance, our members will continue to be employed on NJC terms and conditions and role maps, the PFCC will seek representation at NJC level and representative bodies will be afforded a seat on the PFCCP.

Non-warranted policing activities

Firefighters are dedicated professionals who provide an independent, humanitarian service. Operational and organisational independence from the police is a red line.

While the Policing and Crime Act maintains the ban on serving police officers working as firefighters, many PCCs have been eager to emphasise that there is scope for firefighters to undertake non-warranted police activities; work with vulnerable people, particularly around issues relating to mental health take a substantial amount of police time. In some parts of the country, firefighters are exploring police community support officer (PCSO) work.

The FBU seek a firm commitment that you will maintain firefighters' operational independence from the police, and that firefighters will not be compelled to undertake police community support officer (PCSO) work.



Establishment, crewing, pumps and stations

Since 2010, the government has reduced central funding for Fire and Rescue Authorities (FRA) in England by over 30%. As a result, over 11,000 frontline Firefighters have been lost, 40 stations have closed and scores of appliances have been removed.

Fire and Rescue Services have downgraded their fire cover through the introduction of day crewing/plus and reduced night cover, lowering establishment and minimum staffing levels and replacing second pumps with targeted response vehicles, all of this has, and continues, to diminish the service to the public. As a result, emergency response times are at their slowest for twenty years.

How quickly firefighters arrive at the scene and how many resources are available can be the difference between life and death. It is imperative that Fire and Rescue Services are properly funded, with resources determined by risk, not cost. Financial savings must not come before public safety.

Our document “Interim Review of Shropshire Fire and Rescue Service Public Value 2012,” outlined an evidenced minimum operational establishment in all departments for SFRS. The evidence and approach used to produce that document reflects the true methodology that should be used by FRSs to produce their IRMPs. And so, our position remains that SFRS should employ staff to the figures we produced in that report to maintain a minimum service delivery to Shropshire’s public.

The FBU seek a firm commitment that you will maintain Shropshire Fire and Rescue Services’ current establishment as a minimum initial requirement. This level is already inadequate and we seek a commitment to staff to the levels outlined in our “Interim Review of Shropshire Fire and Rescue Service Public Value 2012.” This is required to ensure local and national resilience to fire and other emergencies.

Efficiency savings

The Government’s Austerity agenda has meant Police forces facing similar unprecedented budget cuts. The FBU is concerned that under a shared governance model, FRS resources could be used to prop up ailing Police forces. Although the legislation ensures Police and Fire will continue to



receive separate funding, there is still room for budget flexibility on shared and joint costs.

Growing collaboration between each of the three services is becoming increasingly evident. The project to rebuild Telford Central Fire Station has investigated at length all opportunities for collaboration. The coordination between all services in planned and dynamic operational response has grown exponentially and communication lines are increasingly improving.

As stated previously, we believe in the need for investment not further cuts, but undoubtedly efficiency can always be found in an ever evolving environment. Closer collaboration has and will continue to take place. This can be done without a PCC governance takeover and therefore negate any discrepancies of funding between the three services.

The FBU seek a firm commitment that the cost of joint ventures will be apportioned fairly, reflecting the usage of each service, and that any efficiency savings achieved from the Fire and Rescue Service will be reinvested in fire and rescue front line staff and resources.

Privatisation/Mutualisation

The Fire and Rescue Service has witnessed creeping privatisation in many areas. Personnel, estates, training and frontline equipment including fire engines, have been handed over to the private firms seeking to make a profit. It is always claimed that this is a more 'efficient' way to operate but too often this proved not to be the case as epitomised by the scandalous FiReControl, PFI contracts and the disastrous experience with AssetCo in London.

We have also seen examples elsewhere of privatisations which have completely failed, forcing the state to step in with a public bail-out. The failure of Metronet on the London underground is just one such example.

These examples highlight how the privatisation of emergency services is a dangerous and flawed policy. Local communities cannot afford to rely on the commercial success or otherwise of a private firm to ensure that they have fire and rescue cover. The only sensible and safe policy for the fire and rescue service is for it to remain firmly in the public sector.

The FBU seek a firm commitment that Shropshire Fire and Rescue Service's frontline, operational personnel and resources will remain in the public sector.

Emergency Fire Control Rooms

Despite the Government's assurances that Police and Fire and Rescue Services will remain operationally distinct, several PCCs have mooted merging Police and Fire Controls and employing joint call handlers. The clear inferences in the IBC regarding SFRS's Fire Control represent our most immediate and urgent concern.

Firefighters in the Emergency Fire Control Room are uniformed personnel and are an integral component of the frontline in the Fire and Rescue Service. They are dedicated professionals with an in-depth specialist knowledge of fire command and control, trained to provide life preserving advice to members of the public trapped in burning buildings, and determine what resources to mobilise to fire and rescue incidents. Shropshire's Fire Control (more than any other) coordinates the entire Service in every aspect as a central logistics hub. The service that it provides cannot be replicated from a remote location outside the organisation.

Shropshire Control has only recently been the subject of a rigorous analysis under the 20:20 IRMP and its value to the service as a stand-alone control room should not be in doubt. The outcome of that analysis has provided a direction of travel for Shropshire's Fire Control to become an integral part of SFRS's operational intelligence in the Operations Dept. The value of this transition cannot be underestimated to secure Firefighter safety and the organisation's protection against litigation and reputational challenge.

Any suggestion that their role is now under the prospect of merger/transfer to another county or subsumed into some, as yet undescribed, joint police/fire organisation can only lead to greater stress on an already overloaded workforce and takes no account of resilience nor business continuity planning.

Business continuity planning dictated through the IRMP must recognise the correct balance between "dependency" and "duplication." Excessive duplication can clearly be seen as inefficient, but excessive dependency (in the case of Fire Control) can lead to catastrophic failure. Avon and Somerset Police control operations were severely curtailed recently, due merely to an



owl disrupting the power supply⁵. Plans for both Hereford and Worcester FRS and SRFS, to include the resilience that these essential departments provide, will require two provisions of the service that their Fire Control Rooms provide.

In terms of any integration with Police control, there are many further issues that need to be considered. Police control operators have a very different culture (non-uniformed) and call handling procedures with a separate role for call handlers and dispatchers.

The FBU seek a firm commitment that Shropshire Fire and Rescue Service control staff will continue to be employed on NJC terms and conditions, adhere to nationally negotiated role maps and that their position as a stand-alone Fire Control room in Shropshire is secure.

Use of Fire Service Premises

Aside from the savings in governance it appears that there is to be a radical review of the police estate in order to release capital and make greater use of Fire Service premises with the assumption that this is desirable and productive. We have grave concerns that a permanent police presence on fire stations may have an adverse effect on community use of those stations. Many community groups and charities which make use of the community facilities on fire stations work with the most vulnerable members of the community, asylum seekers from more authoritarian parts of the world for example, who may feel uncomfortable using a facility with an overt law enforcement presence.

Furthermore, we foresee a significant risk of reputational damage to the fire service if identified as an arm of law enforcement.

The FBU seek a commitment that community facilities and the neutrality of the fire service will not be compromised in the shared estate or in wider collaboration measures.



Conclusion

In responding to the PCC's IBC to takeover governance of SFRS there are two distinct areas which concern us. The FBU has a principled opposition to PCCs taking over governance of FRSs on the grounds that there is no public desire or mandate for such a takeover and also that the necessary and important distinction between the services require them to remain independent from each other. We also believe that the required collaboration and hence efficiency that can be exploited between the services can be achieved under the representation model. Under the representation model, the important issue of Fire Service neutrality and all that it gains us in community engagement will not be lost.

The second area of concern is around the future projection of service delivery for SFRS and the other two services. £4 million cuts is a real threat to the service provided to the Shropshire public. We have campaigned and worked to limit the Austerity cuts over the last seven years and find our service already barely functioning. Further cuts are not achievable. Had the IBC identified areas where real investment could be made to improve service in West Mercia, opposition to the IBC may not be so vociferous. Of course, either way (investment or cuts), the ability of the PCC to introduce change into the future better than the current governance model has not been convincingly made.

Summary of recommendations and position

- It is certainly evident to us that all three services require investment to fulfil their minimum service delivery targets rather than further cuts.
- If the joint governance bid is successful, in order to achieve a genuine mandate John Campion should stand down and seek re-election as PFCC.
- We would like to see an extension of the deadline if the responses to the consultation are not representative of a wide cross section of West Mercia communities. We would also like to see the full publication of the responses and a breakdown of the statistics.
- The FBU need a firm commitment that you will not seek to introduce a single employer model.
- The FBU seek a firm commitment that, in the event of a transfer of governance, our members will continue to be employed on NJC terms



and conditions and role maps, the PFCC will seek representation at NJC level and representative bodies will be afforded a seat on the PFCP.

- The FBU seek a firm commitment that you will maintain firefighters' operational independence from the police, and that firefighters will not be compelled to undertake police community support officer (PCSO) work.
- The FBU seek a firm commitment that you will maintain Shropshire Fire and Rescue Services' current establishment as a minimum initial requirement. This level is already inadequate and we seek a commitment to staff to the levels outlined in our "Interim Review of Shropshire Fire and Rescue Service Public Value 2012." This is required to ensure local and national resilience to fire and other emergencies.
- The FBU seek a firm commitment that the cost of joint ventures will be apportioned fairly, reflecting the usage of each service, and that any efficiency savings achieved from the Fire and Rescue Service will be reinvested in fire and rescue front line staff and resources.
- The FBU seek a firm commitment that Shropshire Fire and Rescue Service's frontline, operational personnel and resources will remain in the public sector.
- The FBU seek a firm commitment that Shropshire Fire and Rescue Service control staff will continue to be employed on NJC terms and conditions, adhere to nationally negotiated role maps and that their position as a stand-alone Fire Control room in Shropshire is secure.
- The FBU seek a commitment that community facilities and the neutrality of the fire service will not be compromised in the shared estate or in wider collaboration measures.



References

- 1 House of Commons Library Briefing Paper Number 00634, 14 June 2017 Police Service Strength
- 2 House of Commons Home Affairs Committee, Police and Crime Commissioners: here to stay, Seventh Report of Session 2015-16, March 2016
- 3 PCC Candidate Election Leaflets 2016 <https://www.choosemypcc.org.uk/area/west-mercia>
- 4 Appendix to report on Public Value Review Update Shropshire and Wrekin Fire and Rescue Authority 17 June 2015
- 5 <http://www.bbc.co.uk/news/uk-england-bristol-41072875>



Consultation Response from APFO to the document West Mercia Fire and Rescue Governance

The APFO branch of Prospect is the Staff Association which represents the strategic leaders of the Fire and Rescue Service including Chief Fire Officers, Deputy Chief Fire Officers, Assistant Chief Fire Officers, Area Managers and their equivalents. We therefore represent members of the executive teams in both Hereford and Worcester and Shropshire Fire and Rescue Services.

In order to make the response easier to follow we have made a number of general comments and then supported these with section specific comments.

General Comments

APFO are pleased to offer a formal response to your consultation document "West Mercia Fire and Rescue Governance". APFO's position on changes to governance arrangements, following the introduction of the Policing and Crime Act 2017, is that we will review each business case separately and with an open mind. We will, as you would expect, look to protect the interests of our members and ensure that any such cases are robust and any proposals are in the best interests of the public.

APFO also believe that whilst it is not a statutory test, there should be a local will from the various key stakeholders for any change in governance to be taken forward. If a Police and Crime Commissioner (PCC) cannot convince the constituent local authorities, the fire and rescue authorities and the public that there is a local case for a change in governance then APFO would suggest that serious questions need to be asked about the robustness of any such business case.

Overall APFO are pleased with the approach taken and the tone of the business case that has been produced for West Mercia PCC. The language and openness of the document are different to approaches taken in some other parts of the country and, in our opinion, there is a greater balance to the document. It is pleasing to note that the suggested route, should the business case progress and be approved is to try and engage all stakeholders in any change process and take an incremental approach to what is a complex and difficult governance change. APFO's experience from across the UK with the mergers of fire and rescue services is that these change programmes are challenging and any business case that over promises perceived benefits is likely to under deliver. A change of this magnitude has the potential to seriously impact on public safety and should not be undertaken lightly or without deep consideration for both the benefits and potential risks that exist.

The document expresses strong sentiments in relation to the staff in all three organisations and again this is something we welcome. All three organisations are people centered with the vast majority of spend being in this area. In these situations an organisation's success or failure will ultimately depend on its people. Too often we have seen business cases that don't give due consideration to the staff who make up the separate organisations and treat people as a commodity rather than the most valuable assets. We would hope

this approach will continue in West Mercia no matter what the outcome of this consultation process.

There does however seem to be one significant omission from the business case options that have been examined. It appears that the representation model, whereby the PCC requests a seat on the fire authorities as a voting member, has not been examined at all. Given this is one of the options available to PCCs under the Policing and Crime Act 2017. It is hard to make a clear judgement on the business case and therefore the best option for the public when an important option appears to have been excluded. It is appreciated that the PCC already sits on both FRA's without voting rights, but APFO would suggest that the representation model (with voting rights at FRA and/or at a separately established Police/Fire Collaboration Board level) is a viable first step to improved collaboration even if the longer term aspirations are for a more radical change to governance in an area. To simply ignore this option denies any consultee the opportunity to consider all of the available options fully. There are a number of other PCCs around the country who have moved forward with this option showing that it does have significant potential to deliver tangible collaborative benefits.

The Policing and Crime Act 2017 only placed a statutory responsibility on the emergency services to collaborate from 03 April 2017, prior to this any collaboration was nothing more than a 'coalition of the willing'. We would suggest that there is possibly some merit in seeing if this new legislative environment does in fact deliver an increase in collaboration as was the intention of the legislation. This is particularly a viable option where there is no local agreement for any proposed changes to governance.

The business case makes reference to the Emergency Services Network from an enabling future change perspective but possibly doesn't fully acknowledge the significant workload that will be faced by all three of the impacted organisations over the next few years in implementing this programme. The Emergency Services Mobile Communication Programme (ESMCP), which will ultimately deliver ESN, has already suffered from implementation challenges and compressed timescales adding to the burden for each service. At a time of shrinking resources the implementation of such a major risk critical programme must be fully considered. Laying too much change on to any organisation is one of the major reasons so many change programmes fail to deliver the planned benefits from the original business case.

We would specially caution about the plans to move quickly towards the introduction of a merged Police / Fire control room system and function; although the soon-to-be opened Joint Operations Communications Centre between West Mercia Police and Hereford & Worcester FRS demonstrates clearly that the organisations see the merits of Fire and Police working more closely in this environment. Furthermore, the two FRS's are already working to align their Command & Control functions, supported by the fact that both currently utilise the same mobilizing system. However, APFO believe that due account should be given to the additional complications of doing this at the same time as implementing ESN. While savings from reductions in staff numbers can be assessed APFO would also suggest that definitive costs are gathered from the suppliers involved in the current control room capabilities before any savings are identified in the business case in this area. Our experience from across the UK

that the costs of any change to support ESN are already very high and delivering a major programme such as a shared control room during this transitional period may prove to be extremely expensive.

The business case puts forward the view that efficiency gains of £4m per year are possible from this governance change. However, there is a lack of real evidence to underpin the claimed savings. We would caution about making optimistic assumptions about staff headcount reductions without detailed analysis of the challenges that are faced during the merger of support services for the three organisations.

APFO believe that that almost all of the identified savings can be achieved from any of the governance options if there is a genuine will to collaborate – indeed, both FRS's have significant efficiency plans which they are on track to deliver by 2019/2020. This underpins our view that the new legislative environment may deliver this genuine will to collaborate without the disruption of a significant change to the governance arrangements being necessary.

We fully support the view put forward in relation to the disruption caused by the Single Employer Model. APFO do not support a single Chief Officer approach and believe it is fraught with individual, organisational and operational risk. We certainly do not view the maintenance of a Chief Officer for each organisation as a luxury. We believe this is both necessary and will help ensure the correct level of strategic knowledge and experience is available throughout what is likely to be a challenging journey.

The operating environment for both the fire and rescue services and police forces at the moment is changing rapidly and dynamically. New risk environments are emerging requiring the chief officers to have a deep understanding of the cultures, capabilities and limitations of their individual services. We do not believe this is currently achievable from a single chief officer with either a police or fire background. In future development programmes and planned relevant experience may make this an option to consider but we do not believe it is a viable option at this moment in time. We also believe that a PCC will make better decisions if they have independent advice from heads of service from both fire and police chief officers. We therefore support the recommendation made that this option should not be pursued.

Specific Comments in Relation to the Strategic Case

The strategic case discussed three opportunities to be addressed: accelerating collaborative working from front-line services; transforming enabling services; and exploiting investment in an information enabled future. APFO would suggest that all of the potential benefits and efficiencies could be achieved under any of the governance options if there was a genuine will to do so. There are numerous examples from across the country of ambitious collaboration projects, delivering tangible benefits and efficiencies that are not linked to governance changes.

APFO are slightly concerned about the terminology used in relation to transforming enabling services. Suggesting a 'rapid' reappraisal and redesign of the enabling services seems at odds with the more measured approach

throughout the rest of the document. In our experience rapid service redesigns are likely to fail or not deliver the intended benefits. We would suggest a measured approach to service redesign with full analysis and careful consideration. The level of change suggested should not be underestimated and APFO would not like to see the performance of either organisation deteriorate as a result.

It is worth restating our concerns about relying too much on early efficiencies enabled through ESN. The ESN will no doubt, at some stage, become a strategic enabler for technology change and efficiencies between emergency services. The programme however has already experienced significant delays and this will likely increase the pressure on all of the emergency services. In addition, there is no mention in the initial business case of the potential upfront investment that would be required to get all three organisations on the same technology platforms. Specifically, we would suggest trying to deliver further changes to control rooms during this period is fraught with risk and could possibly be extremely expensive.

The business case states that change is hindered at present by the multiple governance bodies. Whilst this statement may well be true it is difficult to see where this statement is supported by evidence.

Specific Comments in Relation to the Economic Case

The reduced governance costs outlined in the economic case seem reasonable but it is difficult to understand exactly how the calculation has been made. The assumption about reducing existing costs that are borne by the PCC would suggest a level of existing over capacity or inefficiency. Greater clarity around the transitional costs would also be helpful and we suggest, based on our experience in other areas, that the costs may be greater than is being portrayed in the business case (as highlighted above in respect to the potential investment requirements for ICT).

APFO would also suggest that the predicted 25% saving from re-design of enabling services is an ambitious target especially given the fairly substantial existing collaboration through the Police Alliance and the fact that both FRS's have already significantly reduced their support service costs over the last 5-10 years.

Specific Comments in Relation to the Commercial Case

APFO support the approach to maintaining the separate strong brand identities for the existing organisations. APFO also support, in principle, the adoption of advisory support for the PCC although we would be interested to understand the detail behind this proposal.

Specific Comments in Relation to the Financial Case

Again more detail around the elements of the financial case would have made analysis of the options a little easier. APFO welcome the acknowledgement that delivering the savings will not be easy. We have already stated that taking this approach from the beginning, should the change of governance occur, will hopefully ensure that the correct level of resources are allocated to the transition, although it is not at all certain from the business case if those resources are readily available within the three organisations.

APFO would also suggest more work is required in relation to capital costs. The current lack of capital funding from government for the fire and rescue services is a real concern and has the potential to create greater financial burdens for the sector.

Conclusion

Overall APFO welcome the proposed approach to the preparation of the business case and the sentiment in which it is written. We have attempted to take a critical friend approach with our consultation response. It is important to remember that any change to governance for a fire and rescue service is a significant event and therefore careful analysis is needed before a final decision is made.

The main weaknesses with the case are in our opinion:

- The lack of analysis in relation to the representation model (with voting rights). This model provides some significant opportunities to improve collaboration without the cost and disruption of a more radical approach to governance change. To simply ignore this option, which may deliver similar levels of savings to the Joint Governance approach denies any consultee the opportunity to consider all of the available options fully;
- The IBC contains insufficient information to assess whether the £4m figure is an achievable level of savings or to clearly identify where they might be drawn from without compromising FRS function and delivery. It is difficult to see how even the very ambitious expectation of a 25% reduction in enabling would achieve this when the dual role of many officers (operational and managerial) and the technical nature of their roles (such as operational training) are taken in to account.

APFO believe that the Joint Governance model should only be adopted when there is local support from the constituent local authorities in an area.

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Police and Crime Commissioner
OPCC
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Hindlip Hall
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WR3 8SP

11th September 2017

Dear Mr Campion

Fire and Rescue Service Governance Business Case Consultation Response

As you are aware from our conversation the Fire Officers Association has no political affiliation and therefore our work is focussed on providing the best support we can for our members. It is with this in mind that we take a pragmatic approach to any possible change in governance arrangements for fire and rescue services.

At all times we will act in what we consider to be the best interests of our members.

Our main points are;

- The fire and rescue service identity should be retained.
- The organisations should remain separate with their own leadership.
- Budgets should remain separate at all times.
- The FOA would like to see continued investment in training for firefighting staff, we see this as being essential to maintain firefighter safety and maintaining the appropriate level of professional competence.
- Collaborative work is important but the FRS does not need to lose sight of the single service skills such as fire and rescue core skills and fire safety work and inspections. In addition it is also important that time and adequate resources are available for these single service functions to be carried out.

Members wanted to reinforce the importance of the service retaining and strengthening their prevention role so they do not just become a response service. The fire and rescue service nationally has a very strong brand image in this area of work that has led to many successes in the past. Members are keen to see this being continually exploited for the good of West Mercia residents.

The FOA would not advocate a policy of compulsory redundancies from the fire and rescue service support staff (or compulsory redundancies from any section of the workforce). The FOA would advocate an incremental approach merging "back office" arrangements and allow natural wastage to occur over time where possible.

Our middle manager members have in our opinion taken more than their fair share of reduction in numbers leading to significantly increased workloads. In some cases this has led to unsustainable levels of responsibility and work leading to mental health problems for our members. We would seek reassurance that further reductions would not be made and our members well being is considered at all times.

For many years we have been critical of some fire and rescue authorities not holding Chief Fire Officers to account resulting in some services being statutorily inspected with all the negative attention that brings to the fire and rescue service in general. The FOA would be interested in hearing in detail how the change in governance arrangements would improve accountability within the Fire and Rescue Service.

In addition the FOA would be interested to learn the detail of how you would ensure that both Fire and Rescue Services would be prepared and positioned to score well in its first HMICFRS inspection.

The FOA would be interested to hear in detail how you would deliver the bullet points listed on pages 4-6 of your business case?

Considering all the above the FOA would support in principle your preferred option as described in the consultation document.

As stated above this is an "in principle" decision and the FOA will be guided by the FOA national Executive Board and its members in the two Fire and Rescue Services as the move towards a change in governance progresses.

Yours sincerely



Ade Robinson
Assistant Chief Executive
Fire Officers Association

Information about the Fire Officer's Association

The Fire Officers' Association was formed in 1994 in order to offer members of the service an alternative representative body which would seek to represent their views and further their aspirations in a non militant manner, free from political affiliation. A Certificate of Independence under the above-mentioned 1992 Act was granted in June 1995.

Management of the Association is vested in the Chief Executive and the Executive Board comprises serving personnel from around the United Kingdom. Membership is open to all roles (uniformed and support) but predominantly includes middle managers. It is this group of FRS staff that the Association represents in the national negotiating machinery through membership of the Middle Managers Negotiating Body (MMNB).

Since its formation the Fire Officers' Association has developed the service offered to members and we believe that the Association is in a position to offer members of the Service, particularly those in management roles, an organisation that provides representation in a responsible, constructive and modern manner.

Whilst the Association represents members in all sections and roles within the Fire and Rescue Service, our primary focus is on those members working in management roles who have day-to-day responsibility for the implementation of policy and development initiatives.

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FIRE CONSULTATION RESPONSES

Members of the public / businesses - written submissions

In view of the recent FIASCO, involving your leader and Prime minister, I think you should be trying to get CLOSER to the PUBLIC. MRS. (EQUALITY)MAY has GAMBLED and FAILED, I want SERVICES, and if these have got to be paid for by INCREASED TAXES, then I want to be CONSULTED, I was born in the town in 1948, the population has increased, yet the policing has got WORSE, we had a SUPERINTENDENT based in Evesham controlling 100 officers, now we have a sergeant? .A police house /officer, in every village, sold off by the CONSERVATIVES? IF the FBU are to be believed Evesham's overnight fire cover, will be provided by PART TIME RETAINED FIREFIGHTERS. In CONCLUSION I would like to see your CV, to see if you're a part time County /District councillor drawing ALLOWANCES, in addition to your £70k+ P&CC SALARY.

When bodies get so big issues arise, need to stick to one job ?

I am responding as a Member of the Public to your proposals to take over Shropshire and Wrekin Fire and Rescue Authority please don't assume that I'm interfering I'm only trying to help.

Stage One

The proposed takeover of the control room of Shropshire Fire and Rescue Service to create the three counties super control room based as West Mercia Constabulary force headquarters Hindlip Hall Worcester.

Stage Two

The proposed creation of West Mercia Constabulary Police and Fire Authority which is the next step.

Stages Three and Four

Just like you would have done with the control room of Shropshire Fire and Rescue stages 3 and 4 would be done same as the Shropshire Division of West Midlands Ambulance and Paramedic Authority.

Q1 Do I support your proposals

Answer. I can only support your proposals only if after stages one and two you improve Shropshire Fire and Rescue Service what I mean by this is there are lot of people in Shropshire who would like to presume that Shropshire is 50 years behind and I can only support your proposals if you can try to agree to take Shropshire Fire and Rescue Service forward 50 years my proposals shall be set up further down.

Q2 What are my main reasons for answer to Q1

Here are my answers financial considerations, service resilience, service collaboration, replacing the existing fire and rescue authorities and upgrading West Mercia Constabulary and Shropshire Fire and Rescue Service.

Q3. In what capacity are you responding

Answer. As an individual member of the community of Shropshire as I believe when you grow up within a emergency service there comes a time when you need to give something back and never take an emergency service for granted.

Q4 Do you work for any of the following: Hereford and Worcestershire Fire and Rescue Service, Shropshire Fire and Rescue Service and West Mercia Constabulary

Answer. I currently do not work for either Hereford or Shropshire Fire and Rescue Service or West Mercia Constabulary

Q5. Are you any of the following, Town or Parish Council, District/Borough/City Councillor, Unitary

Answer. At present I am not a Councillor

Q6 Please confirm your age.

Answer 47

Q7 Please confirm which local policing area you live in

Answer Shropshire

Other Stakeholders – Written Submissions

SECOND TIER COUNCILS
<p>Malvern Hills DC</p> <p>Thank you for the opportunity to respond to the current consultation on proposals to change the fire governance across the West Mercia area involving the PCC taking over responsibilities from the current two Fire Authorities.</p> <p>I recognise that district councils are not statutory consultees but hopefully our response is helpful as the proposals will affect one of our key frontline services serving our communities. I am sending this response on behalf of the District Council. Our Overview and Scrutiny Committee considered a report on your proposals at its meeting on 27th July 2017 and made some specific comments and questions which are included below.</p> <p>We have the highest respect and support for all of our ‘blue light’ services and it is hoped that the current proposals will not have any impact on the ability of all of these services to continue to deliver to the highest quality. The Malvern Hills district is very rural and the Hills pose a fire and rescue risk and we would wish to see the excellent cover maintained.</p> <p>The Council acknowledges that the Act allows for Police and Crime Commissioners to consider governance changes in the manner you are proposing. Clearly, you will need to make a judgement whether the timing of the proposals is right and serves the best interest of our communities. Our Overview and Scrutiny Committee has asked if the model you propose has been used elsewhere; and if so has it been successful? There has been some concern raised by Councillors that a democratic deficit could be created by replacing the councillors who sit on both Fire Authorities with a single person.</p> <p>Increased joint working between the two fire services within West Mercia is perhaps a much more effective route to pursue by the two respective Fire Authorities rather than start with governance changes. Our experience of joint working is that it builds resilience, improves services and delivers managerial savings where there is duplication whilst protecting the frontline services. We believe that this could equally be true of the two fire services having a much closer integration.</p> <p>From a financial standpoint, the business case, which states a saving of £4m from the proposals, does not appear to be clear enough on how those savings would be achieved. Again, our Overview and Scrutiny Committee has asked that the independence used to assess the report of the business consultants should be demonstrated, if this were to go ahead.</p> <p>In summary, while the Council is not persuaded that the governance changes are required at this time we support any efficiency gains and options for increased resilience both between the two fire services and by West Mercia Police working with the fire services.</p>
<p>Redditch Borough Council</p> <p>I am contacting you in my capacity as Leader of the Council to outline Redditch Borough Council’s response to the current consultation process in respect of the future governance arrangements for the Hereford and Worcester and Shropshire Fire and Rescue Services.</p> <p>During a meeting of full Council in Redditch, held on 24th July 2017, the West Mercia Fire and Rescue Governance consultation pack was debated by Members. Based on the content of the consultation pack and the points discussed by Members during the meeting it was concluded that Redditch Borough Council’s preferred option would be for the current governance arrangements that are in place for the Hereford and Worcester and Shropshire Service to continue. I have attached a completed copy of the consultation form together with an extract from the minutes of the Council meeting which provides further information about the background to our position.</p>

Worcester City Council

I am writing in relation to the recent meeting, convened by the Communities Committee, here at Worcester City Council. An informal session was held at the Guild Hall on Wednesday August 2 2017. The objective was to engage all member in the consideration of the Fire and Rescue Governance proposals for consultation and to develop a response. Thank you for the input provided by Andy Champness who attended the meeting along with Gareth Boulton to introduce the proposals and answer questions.

Following an extensive and lively debate I now enclose the completed consultation form which represents the cross party view of Members at Worcester City Council, for your due consideration. It is recognised that the City Council is not a statutory consultee in this matter, however it is equally anticipated that our collective opinion will add value to the process.

Should any further engagement with this process be required, the opportunity to input into and shape future governance proposals would be welcomed. (COMPLETED CONSULTATION SURVEY INPUT)

Wychavon District Council

On behalf of Wychavon District Council, thank you for the opportunity to respond to the current consultation on proposals to change the fire governance across the West Mercia area involving the PCC taking over responsibilities from the current two Fire Authorities. I recognise that district councils are not statutory consultees but hopefully our response is helpful as the proposals will affect one of our key frontline services serving our communities.

I am sending this response on behalf of the District Council which considered the consultation at its meeting on 26 July 2017.

We have the highest respect and support for all of our 'blue light' services and it is hoped that the current proposals will not have any impact on the ability of all these services to continue to deliver to the highest quality.

The Council acknowledges that the Act allows for Police and Crime Commissioners to consider governance changes in the manner you are proposing. Clearly, you will need to make a judgement whether the timing of the proposals is right and serves the best interest of our communities.

Increased joint working between the two fire services within West Mercia is perhaps a much more effective route to pursue by the two respective Fire Authorities rather than start with governance changes. Our experience of joint working is that it builds resilience, improves services and delivers managerial savings where there is duplication whilst protecting the frontline services. We believe that this could equally be true of the two fire services having much a closer integration.

From a financial standpoint, the business case which states a saving of £4m from the proposals does not appear to be clear enough on how these savings would be achieved. In summary, while the Council is not persuaded that the governance changes are required at this time we will support your aims to achieve any efficiency gains and options for increased resilience both between the two fire services and by West Mercia Police working with the fire services.

TOWN AND PARISH COUNCILS**Alvechurch PC**

Alvechurch Parish Council welcomes the opportunity to comment on the Police & Crime Commissioner's (PCC) proposals to bring together police and fire service governance within his role as Commissioner. He expects that by replacing the committees currently responsible for the Shropshire and Hereford/Worcester Fire Services, he will achieve better collaboration between police and fire services and significant savings through efficiency gains of over £4 million per year.

We, as a council, do not support the PCC's proposals and offer the following points in support of our position:

The basis in law or in government policy for a PCC to take on Fire Service governance is not clearly given in these consultation papers from Mr Campion. If this is speculative activity by Mr Campion and other PCCs in a few places, the results could be several forced and unhappy service combinations and a too piecemeal, country-wide arrangement.

However we now know from further study, that support for exploration of the PCC acting as Fire Service Authority comes from the Policing and Crime Act 2017 which, among other matters, contains a wide range of measures to improve the efficiency and effectiveness of police forces, including through closer collaboration with other emergency services and to enhance the democratic accountability of police forces and fire and rescue services (Home Office Circular of March 2017 provides details of the provisions of the Act coming into force on or before 2nd May 2017).

Taking on the role of Fire Service Authority is one of several new arrangements for the PCC that the Act permits and we will comment later on the benefits of giving prior consideration to these other routes.

We have yet to see convincing evidence that PCCs are the successful model for Police Service governance as it does seem to depend on the qualities of the particular post holder. Mr Campion in his first year has produced a useful plan for a Safer West Mercia in the period 2016 to 2021 and the matters to which he will give particular attention as Commissioner run from page 4 to page 12. In Appendix 1 the Commissioner then adds his pledge to sustain existing and build new partnerships towards a Safer West Mercia – no mention here of acting as Fire Service Authority .

We think in this, his second year in office, and with much of the timeframe for the Police Plan still remaining, it is too early for him to consider seeking the Home Secretary's agreement to take over as the Fire Service Authority for Shropshire and Hereford / Worcester. There is also accumulating evidence from the Inspectorate of Constabulary and the Independent Police Complaints Authority that changes and/or improvement in the Police Service's performance are needed in those police services to which these matters apply. Surely a PCC's over-riding priority is to hold the Chief Constable to account and to maintain this focus on policing and crime reduction.

This proposal to extend the PCC's role to cover fire services looks to be a too top-down initiative with little evidence provided in the consultation papers of what the two fire services covering West Mercia themselves might be proposing in terms of future ways of working including greater collaboration

We consider that recent developments in England relating to terrorism and the police response and to the safety of buildings and the fire services response have stirred public concern. Whilst savings across emergency services should always be investigated, the national mood is currently very much against proposals to save money in that sector. Greater investment is clearly needed in our emergency services: in the Police Service to recruit more officers and strengthen areas like cyber-crime and especially in the Fire Service to promote more rigorous fire inspections. Public perception of a desire for more savings in the emergency services will not be positive even if the claim is that the PCCs projected £4m savings will not impair fire services front- line capabilities. That public perception could also extend to concern over whether there is a natural blending of criminal investigations with rescue services.

The PCC's initiative around governance will have been helpful if it does encourage a review by the two fire services in question of how they might be better managed and structured to work together, and with the police service for greater effectiveness and efficiency. It is here that the new Policing and Crime Act 2017, Sections 1- 5, on collaboration agreements are helpful in introducing new duties on police, fire and rescue and emergency ambulance services to keep opportunities to collaborate under review, and further, to enter into collaboration agreements where it is in the interests of their efficiency or effectiveness. This sets a clear expectation that collaboration opportunities should be fully exploited and this is where we consider the PCC should direct his best efforts towards a West Mercia Fire Service that forms organically from within the existing Fire Services and then enters into a formal collaborative relationship with West Mercia Police.

Collaboration efforts will almost certainly be assisted if, in using section 7 of the 2017 Act, the West Mercia PCC seeks representation on the local Fire and Rescue Authorities and with their agreement, becomes a

member of those two authorities with voting rights. We see governance as a later step, better considered within the process of these service collaboration and service authority membership developments. Trials of combined police and fire service models **in a semi-rural, low-problem area** under the auspices of the national Emergency Services Collaboration Working Group **would be a useful way forward. From the particular perspective** of a Parish like Alvechurch, which has a common boundary with Birmingham and major infrastructure connections with the city, closer collaboration between West Midlands and West Mercia emergency services would be a model we would like also to see being trialled.

The collaboration debate as it relates to emergency services and where savings might continue as a Government imperative, inevitably will bring in consideration of a reduction in the number of Police Forces around the country (as has happened in Scotland). This would generate savings, though it could result in some Police & Crime Commissioner posts being lost. Any savings that do accrue from any such changes must be directed back to front-line services i.e. more officers on-the-beat or in detective work....and/or more firefighters.

Clun PC

Clun Town Council with Chapel Lawn objects to the proposals for the West Mercia PCC to take over governance of the Fire and Rescue Service. We concur with the objections raised in the response from the Shropshire Fire Service

Dodford with Grafton PC

Dodford with Grafton Parish Council considered that it was difficult to respond to the proposals in this consultation without the wider context. The proposals would need to be properly costed and very clear about budgetary responsibility and overall control. It would be helpful to know if what was proposed had been implemented in any other area and if so with what result. However, the wider issue was the national context and whether these proposals were appropriate just for West Mercia. The Council could not reasonably form a view without knowing whether the proposals were consistent with what was being considered at national level and properly debated in that wider context, including a consideration of how all the emergency services operates.

Great Hanwood PC

I write on behalf of Great Hanwood Parish Council in relation to this matter. The parish council objects to this proposal because it is concerned that this represents an over centralisation of power with too much control resting with one person. The parish council also has concerns that the PCC lacks the specialist knowledge to govern the Fire Service effectively.

Hadley and Leegomery PC

The Parish Council has considered the above and has resolved to **object** to your proposals to take on the roles currently performed by two local Fire Authorities within your policing area.

The Parish Council notes that the Fire Authority has reduced its budget by 15% since 2012, achieving savings of £3.5m. The Council further notes the Fire Authority's plans to make additional savings of more than £400k by 2020 which would enable it to deliver services without any reduction in the front line, and that it has already invested in appropriate technologies to enhance Shropshire Fire and Rescue Service's organizational resilience and improve its operational efficiency.

The current and future savings have been achieved as a result of staff engagement, public consultation and prudent financial planning from the Authority. The Parish Council is not persuaded that there is a compelling argument for changing the existing governance arrangements.

Oswestry Rural PC

Further to your recent consultation on changing governance arrangements for the local fire services, Oswestry Rural Parish Council considered all the relevant information at its meeting on 29 August 2017. I have been asked to respond that the Parish Council resolved to object to your proposals.

Oswestry TC

The Town Council has considered the above Consultation Paper whereby the Police and Crime Commissioner suggests that by changing governance arrangements for our local fire services, he can deliver more efficient and effective services to our communities. The Town Council wish to strongly oppose the measures as suggested. This on the basis that there are no public concerns over the existing arrangements

and significant concern is voiced over how the Police and Crime Commissioner appears to be exercising more power over significant and long established public services.

The Town Council challenge the financial savings and question the due diligence that has been afforded to the exercise.

There are also major concerns over the potential loss of local accountability if the measures were to be introduced.

It is sincerely hoped that the Police and Crime Commissioner will accept the lack of public appetite and the views of the professionals in this matter; however if the intention is to pursue, then the Council extend a formal invitation for the Police and Crime Commissioner to attend a meeting in Oswestry so that public views can be expressed.

Rock Parish Council

At our most recent Council Meeting my Council considered your Consultation Paper very carefully. Council acknowledges in all public services there is, in the current economic climate, a clear need for savings and it is noteworthy that as PCC you decided to address this. Clearly there is justification for you doing so within the Police services, but the logic behind you trying to do so in another service is not so clear and has arguably, not been made any clearer by this paper.

The respective Chief Fire Officers of Herford and Worcester and of Shropshire are, doubtless, equally aware of the need for economies, and HWFRS carried out an extensive survey of cost cutting proposals in 2013.

Council agreed, there are, and will be, needs for savings and efficiencies for the foreseeable future, but the claim, in the letter attached to your foreword, that the only way this can be achieved is by making your proposed changes, seems too narrow a perspective.

It is not reasonable to assume that as a member, presumably an active one, of HWFR authority for some years, many of your suggestions for efficiency and savings would have been made before. Had they been considered viable by the Fire Authority and the service at that time, surely they would have been implemented.

Whilst the leaders of the FRS's have been consulted about these proposals, your report appears to have taken little account of any views, opinions or suggestions of the other parties regarding their governance. For instance, have the two FRS's expressed any interest in changing their governance system to a commissioner, along the lines of the PCC model, rather than an authority in order to help them make savings? Have they shown any interest in amalgamation between themselves, let alone with the Police?

As far as the latter is concerned, there seems to be some evidence to the contrary, not least because, whilst the public hold both services, in high esteem, their feelings towards the Police are, apparently, not the same as their feelings towards the FRS. There is some merit in the suggestion in the recent report from Shropshire FRS that, there may be some advantages in an amalgamation of FRS and the Ambulance service and that this would make more sense than the proposals put forward by your PCC report for the amalgamation of FRS's and the Police.

Council further debated the salary that goes with the position of PCC they believe it should be a full time job. Council believes that given you currently hold other positions in public office, it is hard to see how you can consider finding the time to take on, and give adequate time to, another complex role. From a cost cutting viewpoint, to propose undertaking further responsibility, with, initially, no increase in salary, is very noble but it might be considered naïve to believe that this would remain the situation in future years.

If, as suggested, no changes to front line services are proposed, all cost cutting would be back office support staff and, presumably, from the current leadership plus the modest saving of fees paid to members of the Authorities. It is easy to imagine a scenario where the savings made by getting rid of a management salary here or there, together with the saving of the cost of having 50 or so County Councillors sitting as FRS authorities, could soon be eroded by salary increases among the remaining managers who have had to take on expanded duties.

Council believes it is reasonable to assume both the Police and the FRS have addressed the need to find ways of reducing the cost of back room as well as front line services and have taken, or are taking, steps to improve the efficiency of these operations. It is hard to see how, in the vast majority of situations, given the totally different operational roles and activities of the Police and FRS, the back room activities could possibly be handled by the same staff.

Council agreed, that there may be scope for considering the sharing of buildings and common facilities where new buildings are needed, but not at the expense of abandoning existing, sound premises and then spending valuable resources adapting others to make them suitable.

Doubtless, all these, and many other, possibilities will have been considered at length by the two FRS's in the proposal if they consider amalgamation is advantageous. Whilst there may appear to be, to an outsider, some obvious advantages to amalgamation and co-operation at varying points, those in day to day contact with the system are surely best placed to decide on the advantage or otherwise of any such proposal. It is also reasonable to imagine that complete cross border co-operation already exists where and when necessary and that deeper integration has probably also been discussed in the past.

It is reported you said at the meeting of the HWFRA on June 5th "The job of holding to account is what we are debating here". Your suggestion that a commissioner, would do a better, more efficient job than is currently being done the two existing FR Authorities. More specifically, you suggest that as joint Commissioner you would do the best job.

Council believes that the idea that having the FRS answerable to one elected commissioner is somehow more democratic than having it answerable to 25 elected councillors sitting as the FRS, is certainly hard to accept. Also coming, as they do, from different backgrounds and areas within the FRS region, 25 members of an authority would, arguably, be a useful source of local information to the chief fire officers, and a great aid in their management decision making.

Your commissioned report offers only three possible choices. It would be interesting to know if the FRS's consider governance changes necessary and as a route to cost saving and, if so, what other options they feel are worth considering.

On balance, given that the answers to the questions in the report, seem to raise many further questions, the subject has clearly not been aired sufficiently, nor would it seem, have all the possible options been considered.

Much more information is needed and more discussion needs to take place before game-changing steps are taken, Changes which may well prove to be most unpopular, and possibly demoralising, to both the members of the three services and members of the public.

Council believes that if you really wish to gather as much opinion about your proposal as possible then it seems that the proposed deadline is too soon.

From the information provided in the consultation document, and from the evidence currently available from other sources, Rock Parish Council is not in favour of the proposed changes in Governance for the H&W and Shropshire FRS's.

It was felt by member that the dedicated Fire Service we have now is the best on offer and Council RESOLVED unanimously to support a proposal to leaving the Hereford and Worcester Fire and Rescue Authority and West Mercia Police Authority alone as two separate organisations with governance as it is now.

Shrewsbury Town Council

Members of Shrewsbury Town Council have had an opportunity to review the West Mercia Fire & Rescue Governance Consultation and we wish to make the following comments.

Just by way of background we are your largest Town Council within your area and act as lead organisation of the Team Shrewsbury Partnership. We have seen close hand how not only West Mercia Police & Shropshire Fire & Rescue but also other organisations work collaboratively together whilst operating under different governance structures. This has been done through a change in culture with operatives and also a clear understanding of the benefits that can be achieved by closer working.

Members are at a loss to understand how you feel the management of police and fire services across four principal authority areas under one single commissioner is likely to become cost effective. Whilst there is much played on the reductions in costs incurred by the Fire Authorities, there is very little on likely increases in costs of the Office of the Police & Crime Commissioner. The suggestion of saving £4m a year comes without any clear business plan on how this will be achieved.

Members also fail to understand the appointment of the Police & Crime Commissioner as the sole commissioner for Police & Fire is improving democratic accountability. The Fire Authorities also have a panel of democratically accountable elected members who by their very nature have a hands-on understanding of the area they serve.

With the reduction in local democratic accountability and lack of clarity as to savings, Shrewsbury Town Council is opposed to proposals to changing the governance arrangements of local fire services in the area.

Stone Parish Council

At our most recent Council Meeting my council considered your Consultation Paper very carefully. It was felt by members that the dedicated Fire Service we have now is the best on offer and Council RESOLVED unanimously to support a proposal to leaving Hereford and Worcester Fire and Rescue Authority and West Mercia Police Authority alone as two separate organisations with governance as it is now.

My Council do not want to see “operational matters” being transferred into the hands of the Police Commissioner who they believe is already a busy position covering the West Mercia Division on its own.

Stone Parish Council wish to express their total support for our dedicated Fire and Rescue Service and the separation it currently has between the West Mercia Police Force.

Shropshire Association of Local Councils (received 15/09/17)

Firstly, I would like to thank you again for joining the meeting of our Executive on 17 July when our Executive members and other representatives of local councils were able to hear your presentation of the proposals and to ask you a number of questions. I forwarded on to you the notes of the meeting and the Association very much appreciated your attendance at the meeting.

Following further discussion at our meeting on Monday, members agreed that they could not support the proposals and were in favour of option one, to maintain the status quo. Whilst members understood the sensitivities around staffing issues, they did not consider there was sufficient evidence to support cost savings of £4m outlined in the consultation document and questions remained about frontline services and equipment and ultimately public safety. Members were concerned that of the £4 million outlined, £2 million of this already related to savings proposals intended by both FRAs so the potential for cost benefits of a single governance did not appear as significant as was suggested. Members noted that those responsible for the governance of the Fire & Rescue Service in Shropshire, Telford & Wrekin were already achieving considerably efficiencies. The Government has recently approved Shropshire FRA Efficiency Plan and through its Service Transformation Programme efficiencies were already being delivered to the way in which the service operates. Members also noted that relations between the Fire & Rescue Service in Shropshire, Telford & Wrekin and West Mercia Police worked extremely well.

With regard to scrutiny and accountability, the performance of the Service is already accountable to local Councillors who represent a wide cross section of the County of Shropshire via an effective Audit and Performance Management Committee. A further opportunity arises for councillors to raise questions via quarterly reports to the unitary authorities. Movement to a single governance will not improve this level of accountability, openness or scrutiny.

May we thank you once again for your time and wish you well for the future in your role as Police and Crime Commissioner.

FIRE AND RESCUE AUTHORITIES

Hereford and Worcester Fire and Rescue Authority

I am writing to provide you with the formal response of Hereford & Worcester Fire Authority to your Initial Business Case (IBC), which recommends a PCC-governance takeover of both Fire and Rescue Services in the West Mercia area.

Firstly, can I thank you for the opportunity that you offered to the fire authorities to provide evidence and context to the consultants as they developed the IBC, which also allowed for some robust debate and challenge to take place prior to its publication.

However, on its publication, it became evident that the genuine concerns raised by the fire authorities during the process had not been reflected in the final document. This led the constituent authorities to ask their respective fire authorities to jointly commission an independent analysis of the IBC, in order to provide a critically constructive view of both the recommendations and any associated rationale and evidence base that supported them.

The analysis report was authored by a former chief fire officer and a former senior public sector manager – both with significant experience in organisational collaboration, as well as shared service and outsourcing models. I have attached the analysis report for your information but I would like to highlight some key findings that the fire authority unanimously felt made the IBC a flawed business case which, as a result, they cannot support:

- a lack of overall detail and clarity of the IBC – particularly in relation to both the nature of and plans to achieve the estimated £4m of savings, as well as how the change in governance was, in itself, the fundamental driver in making it happen;
- the IBC is unclear about the timeline for achieving the savings – as well as there being some real confusion as to whether the proposed changes would or would not impact on operational effectiveness and efficiency of the fire services;
- the scale of benefits (not only from sharing enabling services but also from the shared use of ICT and data) are highly questionable as they appear to be based on academic and theoretical industry standards, as opposed to the reality of three organisations that had already undergone significant change and rationalisation for almost a decade in the face of prolonged public sector austerity and reductions in both annual revenue and capital investment funding;
- an apparent lack of understanding that many so-called "enabling services" including senior managers and training functions are carried out by staff who also have operational responsibilities. The inclusion of such roles within any proposed savings will therefore also reduce operational frontline staff

During the Fire Authority's debate on the IBC, which included the presentation of the analysis report, a number of other areas of concerns were also voiced by fire authority members regarding the practical deliverability of the proposed benefits. Most notably these included the following issues:

- Concern that West Mercia Police were already in the middle of a substantial transformational alliance programme with Warwickshire Police (which requires a significant investment of both people and resources to make it a success) – potentially leading to direct conflict with and/or poorer outcomes for any Police-Fire collaboration work.
- Recognition that the Police were only one of the many partners that Fire currently work with – especially in the wider harm prevention and public wellbeing arenas – which raised concern that Fire's important partnership contribution outside of its work with Police could be detrimentally impacted.
- Appreciation that the delivery of better community outcomes should be the key driver when considering if any collaboration work is worth undertaking in the first place – which, in turn, could mean having to invest in the appropriate time, effort and resources in order to make such initiatives happen. In contrast, the IBC seemed wholly focussed on reducing organisational costs without any real appreciation of the potentially negative impact this could have on ability of the three organisations to deliver such innovation.
- Acknowledgement that the status quo in respect to current governance arrangements should not remain and that a more collaborative approach to the governance of collaborative projects, where

appropriate, could not only help to deliver organisational savings, but more importantly, also help to deliver improved outcomes for our communities

Therefore, in relation to offering a constructive way forward, I would like to invite you to engage, at the earliest opportunity, with myself and Eric to consider how best we could progress the collaborative agenda between our three organisations.

We would like this approach to be one that doesn't involve the wholesale change of governance but, instead, looks to build upon our good track record of collaboration between the three organisations to date and, at the same time, helps to develop appropriate governance arrangements for such activities based on the representation model.

Shropshire Fire and Rescue Authority

Introduction

This document sets out Shropshire and Wrekin Fire and Rescue Authority's (SWFRA) formal response to the consultation on the West Mercia Police and Crime Commissioner's (WMPCC) Initial Business Case (IBC). The response provides background and context to SWFRA's position and it identifies areas within the IBC where there is agreement and areas of grave concern. The document also sets out what SWFRA believe to be a far more practical way of moving forward that includes adoption of the "Representation Model," whereby the WMPCC joins the SWFRA, rather than the proposed "Governance Model," where the existing fire authority is abolished and the WMPCC takes on sole control and responsibility of both Shropshire Fire and Rescue Service (SFRS) and Hereford and Worcester Fire and Rescue Service (H&WFRS) alongside his existing responsibilities for West Mercia Police (WMP).

Background

Following the advent of the Policing and Crime Act 2017, the WMPCC decided to commission a team of consultants to develop a business case for the WMPCC to take on the role of governance for the Fire and Rescue Services that fall within the service area of West Mercia Police; these being Shropshire Fire and Rescue Service and Hereford and Worcester Fire and Rescue Service.

On the 29th March 2017 the Chair of Shropshire and Wrekin Fire and Rescue Authority, alongside the Chair of Hereford & Worcester Fire and Rescue Authority (H&WFRS) and senior officers from SFRS, H&WFRS and WMP were invited to attend a "Collaboration Workshop" at West Mercia Police (WMP) Headquarters. This initial workshop was followed by a number of meetings between Beckford Consulting and individual officers and the Chairs of the Fire Authorities. During this period SFRS, and the other services involved, willingly provided a considerable amount of financial, organisational and cultural information to the consultants in order for them to carry out their analysis with a full understanding of the organisations involved. This included a high degree of candour on the strengths and challenges of each organisation, along with the existing ambitions for greater collaboration.

Throughout this part of the process concerns were raised about:

- the likelihood of the process of changing governance diverting energy and resources away from core activity
- the risk of compromising any of the Services' existing reputation and "brand," thereby affecting their ability to effectively deliver their service
- the apparent democratic deficit that would arise from a move away from a governance model delivered by truly local politicians
- that savings on the scale being purported as achievable by the PCC could only be achieved by the wholesale outsourcing of all Fire and Rescue Service (FRS) support
- functions to the Police. This was immediately recognised as being impractical and not assured of achieving the best outcomes for the Service or the public. There were real concerns from the Chair of the FRA that by becoming nothing more than a very small stakeholder in a much larger operation, the outcome was likely to be degradation of the supporting services that currently appear to be far more integrated into everyday operations in a FRS than they do in other emergency services
- the original intention to discount the current governance situation as "no change," which was eventually amended to read "Sustain Current Trajectory" even though this didn't fully recognise the progress that had already been made towards the PCC being represented on the FRA.
- Throughout the process it was reiterated by all parties that there was already evidence to show a significant amount of collaborative activity was already taking place, both between each FRS and WMP, and there was enthusiasm and appetite for this to grow ever deeper and stronger. What the FRAs didn't believe, was that there was a need to go through the considerable upheaval of a change in governance to achieve this.

There was then a second workshop one month later on the 27th April 2017 when Beckford Consulting sent their findings out to a smaller group of senior officers and elected Members and it was these proposals that have subsequently gone on to form the Initial Business Case (IBC) that is now being consulted on by the WMPCC. It was clear that many of the views and ambitions had been incorporated into the IBC (indeed the idea of a stronger partnership between the two FRSs was gleaned from interviews with Chairs and senior officers from the FRSs) but the areas of concern had not been met i.e. where the proposed £4m in savings would come from and how the democratic deficit would be accounted for.

The WMPCC published his IBC for a 12 week consultation period to run from 12 June 2017 to 11 September 2017. Although this was eventually extended to 15th September 2017 at the request of the Leaders of the Constituent Authorities (CA), who requested a short extension to allow them adequate time to use their Scrutiny Committees to undertake an analysis of the relative merits of the IBC before the CAs could provide a considered opinion.

Early on in the consultation period, the Chairs of the Fire Authorities were asked by the Leaders of their relevant CAs to commission an independent analysis of the IBC. This was in order to undertake “due diligence” in what was recognised as a de facto “hostile takeover bid.” This was to allow the Scrutiny Committees of the CAs to have some context and the ability to balance the evidence being provided to them. This was agreed to and a team from Ameo and Alendi Consulting Services were contracted to undertake an analysis (which is attached within this response as an appendix)

The Ameo/Alendi report was completed at the end of July. At an extraordinary meeting of the SWFRA on 1st August, it was agreed that this report was suitable to be put forward to the relevant CAs to support their Scrutiny Committees and that the report should form a substantive part of the SWFRA’s response to the WMPCC IBC consultation.

During the consultation period, Members of SWFRA have also engaged with a number of key stakeholders. The purpose of this was to get full appreciation of the views of the public and constituents on the relative merits of what is seen as a proposal for a “once in a generation” change.

General Points

Throughout the process SWFRA have accepted and supported the idea that there is both opportunity and benefit from increasing the level of collaboration with both other emergency services and other organisations. SFRS has a history of working closely with partners, whether it be to deliver their front line service more effectively through intelligence sharing and joint delivery or to secure the best support services. The Service is recognised as being at the forefront of adoption of the Joint Emergency Services Interoperability Programme (JESIP), has delivered market leading improvement in Control Room resilience through a partnership with H&WFRS and Cleveland Fire Brigade, and adopts a best practice approach to sharing intelligence with both Telford and Wrekin and Shropshire Councils to target preventative work at those who are most vulnerable and at risk of fire.

SFRS, as one of the smaller standalone FRSs, has also evolved to be an adept and sophisticated commissioner of services; exploiting the market and existing partnerships to get the very best deals and services. Large parts of building, financial, treasury, legal, payroll, pension, occupational health, procurement and much of the IT infrastructure is already managed through contracts with other public sector partners and commercial organisations; vehicles, plant, equipment and clothing are all procured through framework agreements and maintenance is generally carried out through total care packages or partnerships, such as the one with WMP for light vehicles. It is only where a service is highly specialist or critical to our operation that it is maintained in-house – such as servicing and maintenance of the heavy fleet (fire engines), managing contracts or parts of ICT, HR, finance, technical services and planning and performance management, where these functions are time bound and critical to the operation of the SFRS.

Where SWFRA has been frustrated is in its endeavours to collaborate more fully and effectively with other emergency service partners. There has been no progress on valuable initiatives such as co-responding from West Midlands Ambulance Service (WMAS), despite direct approaches from SFRS and a regional approach

from all five FRSs in the West Midlands. SWFRA believe this reticence to collaborate is actually putting the residents of the more rural areas of the West Midlands at greater risk.

SWFRA also feel frustrated at the pace at which progress has been made towards greater sharing of estates. Along with WMP, SWFRA are members of the Shropshire Strategic Estates Partnership and are partners in the “One Public Estate” bid. Along with representatives from WMP, we have enthusiastically entered into investigations to share facilities at several of our premises but to date have only achieved a very small scale initiative at Newport Fire Station. The urgent re-development of one of our primary fire stations at Telford has been significantly slowed as WMP have been determining how the collaboration might best serve their needs. This information is not necessarily put forward as an indication of a lack of will from WMP to collaborate more fully – more as an illustration of the current effectiveness of the WMP enabling services in delivering change across such a “broad canvas.” It is worth note that these are one of the “enabling services” that Mr Campion proposes should take on the additional responsibility for FRSs in West Mercia. To support this the Ameo/Alendi research found evidence that the current pace of progress was “less influenced by the commitment of the parties but (more) by the sheer volume of projects currently being undertaken within West Mercia.”

5 Point Analysis

The Ameo/Alendi report on their analysis of the WMPCCs IBC adopted the Treasury’s “5 Case” model for ease of referencing. This section will do likewise and provide further context and an explanation of some of the key issues in the IBC that are of concern to SWFRA.

i. Strategic – While both Police and Fire and Rescue Services have a shared interest in making our communities safer, the prisms through which both must view this are different. Both seek to protect the most vulnerable but the FRS approach is often more aligned to a public health agenda than one specifically of law and order.

FRSs have had considerable and unique success in reducing the demand on their services through a complex, yet targeted, approach involving initiatives such as lobbying for changes in legislation at one end, right through to delivering programmes of intervention with individuals with fire setting behaviour at the other. In between these two extremes are thousands of targeted home visits, extensive schools’ education programmes and an intelligence led risk based inspection regime of commercial premises. All this leads to a particular relationship with the public that makes up the FRS “brand.” There is real concern that this highly effective strategic direction for FRSs would be compromised once a single governing body was in place over police and fire which would quite naturally, but probably unconsciously, bias the operations of the Services to what is seen as the most pressing issue – i.e. the ever increasing demand on police capacity and the increase in recorded crime. Alongside this there is a genuine concern, from both SWFRA and its employees, that an overtly closer relationship with the Police, and the change to the FRS “brand” that would bring, might compromise the relationship the FRS officers currently rely on when delivering their operational service and accessing the most vulnerable members of the public. We are already seeing increasing numbers of firefighters being attacked while undertaking their duties. Again, this is not a criticism of the Police but a realistic recognition of the power public perception has on how effective Police and Fire Services can be in undertaking their different roles.

ii Economic – It was not made obvious in the PCC’s IBC, but SWFRA were pleased to see from the Ameo/Alendi analysis that the existing combined costs for providing governance to the two FRSs was less than 20% of the costs of the OPCC. In addition to this stark difference in costs, it is clear to see that there are significant benefits in having governance for SFRS being provided by a committee of up to 17 Members, rather than one Commissioner who would have to cover a large police force and two Fire and Rescue Services. The benefits are in having diversity and challenge in decision making, capacity and local knowledge when engaging with communities and staff.

Looking beyond the costs of governance, the IBC purports to be able to make savings in the region of £4m. Within the IBC there is little to substantiate this figure and this has been one of the primary areas of contention for most stakeholders who have tried to analyse the case. Another factor is that Mr Campion himself has conceded in two public meetings that the £4m includes efficiencies totalling nearly £2m that already exist in SFRS’s and H&WFRS’s published Efficiency Plans and will be delivered regardless of any

changes in governance. Discounting this apparent change of tack the Aмео/Alendi analysis points towards the only logical way of achieving the stated £4m as being firstly to rationalise management structures through a merged management team to cover both FRSs and then/also to have all the enabling functions currently carried out by FRSs (finance, HR, training etc.) subsumed into the police and effectively be delivered as a commissioned service. Whilst the FRA believes there is a high level of naivety in this proposal (probably brought about by the pace in which the original IBC was developed, leading to a lack of understanding of the operational or dual role many of our “enabling functions” have in providing incident command, mobilising and control and operational resilience functions) it has already been stated that SFRS has always been open to the idea and practice of outsourcing certain services – but always with the ability to exploit the market to get the best deal for the people of Shropshire. The IBC relies on a considerable restructure across the three organisations that will see the removal of all FRS enabling service costs (through removing over 100 posts), a further reduction of police posts in the region of 30 - 40 and all the work currently being undertaken by FRS staff being subsumed into this reduced police “enabling services” team.

It is also concerning that the actual costs of change, such as project management and redundancy, have not been factored in to the IBC. It is the view of SWFRA, who have had considerable experience and success in reducing the FRS budget over the last 5 years by £3.2m, that the proposed efficiencies of 25% are unrealistically optimistic; particularly when we are advised that the creation of the existing Warwickshire and West Mercia Police Alliance only managed reductions of “back room” costs in the region of 10%.

It should also be recognised that SFRS and H&WFRS currently only spend in the region of 12% of their overall budget on “enabling services” and governance, whereas WMP spends 21%. SWFRA believe this indicates there is some spare capacity, and opportunity for increased efficiency, in WMP but that doesn’t require a change in governance or merger to exploit. SFRA again reiterates that it does support greater and more structured collaboration but it should be where improvements can be made in capacity, resilience and better outcomes for the public.

iii. Commercial – The commercial case in the IBC is confused and difficult to understand but seeks to address the strategic advantage of maintaining the “brand” and achieving political accountability.

It is clear from the reaction in the local press, in Members’ direct contact with their constituents, the views of parish and town councils and the views of the Trade Unions, that a move to the PCC taking over control of the FRS is an unwanted one and is seen as a move that changes the public perception of the FRS. There have been views publically expressed that Mr Campion is “empire building” or should perhaps “stick to the job in hand” with running the Police; but discounting this there are real concerns about an eventual reduction in firefighting resources in Shropshire.

With regards direct political accountability, SWFRA recognise that, following a legislative change to abolish Police Authorities, PCCs are indeed directly elected to serve their communities and govern police services. However there has been no such change for FRAs and Mr Campion was elected to run WMP and not the combined Police and Fire Services of West Mercia. It is Fire Authorities and their elected Members who have provided direct political accountability to the people of Shropshire since 1997 without complaint from the public. While it is true that Members of FRAs are appointed, it is also true that they are taken from a body of elected representatives who have a legitimate political mandate following elections that express the views in Shropshire of between 55% and 60% of the electorate. Unfortunately the same cannot be said for any PCC to date, with an electoral turnout in West Mercia of less than 21%. Perhaps the FRA’s views on this might be weakened if Mr Campion had included his intentions to assume the role of governance for SFRS and H&WFRS in his 2016 manifesto, and the electorate had been able to choose on that basis. As it stands SWFRA believes the people of Shropshire are not behind the IBC and a recent poll in the Shropshire Star, which elicited in the region of 1,200 responses, provided a staggering 78% return opposing the change of governance to the PCC.

The relatively modest costs of FRAs, as compared to the OPCC, has already been highlighted but what has not been recognised is the huge capacity for engaging with the staff and public that can be delivered through the 47 elected Members of FRAs. The Integrated Risk Management Plan (IRMP) is the guiding document for any FRA in improving public safety. It is a statutory duty on the FRA to consult broadly on the

proposals within the IRMP and this is achieved, highly effectively, through the use of officers and FRA Members together.

As a consequence of this IRMPs are considered and measured documents that have consistently brought about improvements in safety and high levels of public satisfaction within ever decreasing budgets.

iv Financial – Concerns about the viability of the financial case have already been raised but there are more technical issues that appear to have had a lack of consideration, such as the impact on precepts and other funding when capital programmes and priorities start to become aligned. However, SWFRA does recognise this is not a problem that is specifically related to the change in governance being proposed and will arise with any progressive alliance between the two FRSs or WMP. However, it is believed that it is easier to maintain integrity in decision making and avoid conflicts of interest when the governing bodies are as separate as the budgets and funding streams.

v. Management – SWFRA are pleased to see that the IBC recognises that any change will require considerable leadership capacity to achieve the level of co-operation that any change demands. Indeed the IBC does not seek to achieve any reduction in posts or capacity until the new plans are fully embedded, with 2019 being indicated as the earliest date. The FRA also recognises that in any alliance there will be the opportunity to rationalise posts as more efficient ways of working are identified – although SWFRA believe that in some areas it will be better to harness the capacity that has been released to maintain momentum for change and improvement rather than simply make cuts. SWFRA's primary concern here is that the IBC purports to maintain the three services as sovereign entities below the level of governance but the actual mechanics of the changes will deliver the contrary. Shropshire currently benefits from a local FRS, governed by local people and delivering a full service for its communities. It is clear that the outcome of the IBC will be something very different, with a governing body based in Worcester, and it is inconceivable that there won't be an eventual migration of management there too. While there will always be benefits in seeking to share specialist resources and services, the outcome of implementing the IBC will be different and SWFRA would worry that Shropshire's safety would then come far lower down in the priorities of any larger organisation or governance model. A change of focus and resource allocation is commonplace whenever emergency services expand to cover a larger area. This refocusing of priorities is entirely understandable in a new context but the reallocation of resources as budgets tighten over time would also be inevitable and to the detriment of areas with lower populations.

vi. Implementation – The major concerns in this area are around the absence of any reference to implementation costs in the IBC. This may be because there is an unrealistic suggestion that the change would be achieved through this new work being absorbed into the workloads of existing staff and managers, who are already dealing with other new burdens such as the introduction of the Emergency Services Mobile Communications Programme (ESMCP), the reintroduction of a long awaited inspection regime, existing collaborations around property, training and procurement, the new responsibilities already coming from the tragic events of Grenfell Tower and countless other smaller changes such as the apprentice levy and gender pay gap reporting; all this on top of the day-to-day business of providing a world class emergency service.

Findings

SWFRA are encouraged that the IBC is not overtly critical of the performance of the FRAs up until this time, and does recognise that significant collaboration already takes place between FRSs, other emergency services and key partners. However the IBC does level implied criticism that greater collaboration can only be achieved through the PCC assuming governance. This is a flawed and inaccurate assumption with little to support it.

The task set to Aмео/Alendi was to undertake a full analysis of the viability of the PCC IBC and, in addition to this, consider its merits against an alternative way forward where the PCC became a full Member of each FRA as part of a review of the structures of the authorities and where a new partnership was created to build a strategic alliance between SFRS and H&WFRS, alongside striving for even greater and more effective collaboration with WMP. SWFRA believed this was a practical and achievable way forward and felt the momentum of collaborative change could effectively be governed by a strategic group of Members and

officers that would include the PCC. Their finding was that all the efficiencies and operational benefits proposed by the IBC could be achieved through greater co-operation as described above.

Many of the respondents to the IBC consultation have complained that the “Representation Model” set out in the Policing and Crime Act had been overlooked or intentionally discounted by Beckford Consulting on the basis it was “business as usual” or “status quo” or eventually “Sustain Current Trajectory.” Indeed several of the other PCCs (Gloucestershire, Sussex, North Yorkshire and Thames Valley) who have committed themselves to undertaking a review of assuming a governing role over FRSs have already arrived at the decision that the “Representation Model” is the most relevant for them.

Both SWFRA and HWFRA have publically demonstrated their enthusiasm to work more closely with the PCC by inviting him to attend Fire Authority meetings and take part in deliberations. The only thing prohibiting the ability of the PCC from having full Member’s rights is the need to change the legislation that constitutes each FRA and this is in the gift of the Home Office.

It is frustrating that more critical analysis of the proposed £4m of savings has not been possible because of the lack of information contained within the IBC. However SWFRA do believe that the analysis that was achieved by Ameo/Alendi is accurate and have grave concerns about the viability of these savings being achieved through the movement “en masse” of enabling services to the Police, and even more grave concerns that if this were to be done that SFRS would not continue to receive the high level of support it currently relies on.

SWFRA welcome Mr Campion’s commitment that he will not undertake any changes that might negatively impact on front line operations but, with the best will in the world that can only be a “gentleman’s agreement” with a short term applied to it. The evidence of 20 years of a locally led Service is clear to see, with SFRS continually improving its service and reducing the numbers of fires, deaths and injuries in the County. This has been brought about through the combined efforts of a 17 strong Fire Authority and a determined focus on the communities in Shropshire. At times, SWFRA has taken decisions that are at odds with both local and national politics because they have been best for safety. That is what an effective local FRA brings. Unfortunately the PCC cannot quote such heritage or assure the security of tenure that allows long term promises to be made about Shropshire continuing to receive the level of service it currently does or that as Services combine their ambitions the needs of the less populated areas in West Mercia will continue to be as recognised as they currently are.

This is not a criticism of Mr Campion, it is simply a product of a political system and the natural behaviour of any organisation that grows to cover a larger area with limited resources.

Conclusion

FRA Members from Shropshire have been engaged in this process throughout and feel that the questions raised at the onset have not been answered. They have already seen considerable officer capacity diverted away from dealing with core activities; concerns about the “brand” being compromised have not been allayed.

The track record of SWFRA speaks for itself. It shows strong and decisive governance over the last 20 years whereas the change proposed in the IBC would bring about conflicts of interest and a democratic deficit. SWFRA have steered Shropshire through a very challenging period of financial hardship and they have delivered a Fire and Rescue Service for the communities of Shropshire that is both financially and operationally healthy. This experience leaves them highly sceptical that the scale of the savings suggested in the IBC can be made without severely compromising the effectiveness of SFRS. However SWFRA have been interested to note that in Mr Campion’s most recent presentations to the CAs he stated that, in fact, the £4m of savings predicted by the IBC actually include approximately £2m of savings already identified in published FRA Efficiency Plans. This makes the proposal for two successful organisations to go through the level of upheaval suggested in the IBC to be even more incredible; particularly when recognising that the anticipated level of savings is now less than 1% of their combined budgets.

Members might have been more assured if there had been enough detail available through the IBC or supporting documentation to allow a fuller analysis, but this has not been the case.

SWFRA do not agree with the PCC's assertion that the only way to make sure the emergency services in West Mercia collaborate effectively is to move governance away from dedicated groups of locally elected representatives, to the hands of one person who will sit remotely and have their capacity stretched between three organisations and three counties. Fire and Rescue Authorities, even prior to the advent of any statutory duty, have a proud history of effective collaboration and the evidence already suggests that this will only continue to improve with the change in legislation.

SWFRA do recognise that after 20 years the time has come to consider a review of the structure and operation of the FRA but they would want to build on the success of the last 20 years, rather than dispense with it.

SWFRA also agrees that even more advantage should be taken of working with partners in the emergency services, but not to the exclusion of others when that makes more operational or commercial sense.

SWFRA strongly believe that a more practical and effective way to foster, drive and harness collaborative innovation is through a combination of a structural review of FRAs, inclusion of the PCC as described by the "Representation Model" and creation of a new, more formal alliance between the Fire and Rescue Services in West Mercia that will secure all the financial and operational benefits of being able to behave like a larger organisation, without any of the cost of becoming one.

In this way local Fire Services can be governed by local representatives who are able to work together where improvements, efficiencies or economies of scale can be achieved.

As such, SWFRA urge Mr Campion to take account of the views of the public, Shropshire, Telford and Wrekin, Worcestershire and Herefordshire Councils, staff representative organisations and those that have been charged with the successful governance of Shropshire Fire and Rescue Service for two decades and consider whether the most appropriate way forward would be the "Representation Model," rather than the one proposed in the IBC. SWFRA believe this to be a more progressive model that harnesses the combined energies of three organisations and allows for innovation to flourish in a truly collaborative environment and without conflict.



HOUSE OF COMMONS

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OFFICE OF THE POLICE
& CRIME COMMISSIONER
WEST MERCIA

19 SEP 2017

RECEIVED

Mr John Campion
Police & Crime Commissioner
West Mercia
PO Box 55, Hindlip Hall
Worcester WR3 8SP

18th September 2017

Our ref: JB / MJC / 18.09.2017

Dear John

I am grateful to you for alerting me and other Shropshire MPs to the consultation on your proposals to seek a merger of the governance and accountability of Shropshire Fire and Rescue Service with Hereford & Worcester Fire & Rescue and West Mercia Police. I would like to offer formally my own thoughts on these proposals.

I support broadly the principle of looking to increase efficiencies within public services, and to increase accountability to the public, which are the driving principles behind your proposals.

Where possible and practical, reducing back office costs through collaboration is an effective way of protecting frontline services, while maintaining good value for money for the taxpayer. I think it is important to retain the distinct identities and budgets of each fire service, as your proposal makes clear it would do.

With Hereford and Worcester Fire Service already looking to combine more closely with the police, including its control centre, it is timely to consider whether it would help service provision in Shropshire to do the same.

I would like to understand more about the practical implications of such a move and therefore look forward to hearing the feedback you receive from the public consultation.

Yours sincerely

Philip Dunne
MP for Ludlow

Dictated and signed on his behalf

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