

## **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.