

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

Malvern Hills DC

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. 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.

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.

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.

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.

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.

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.

Redditch Borough Council

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.

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.

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&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 Champion 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 Champion 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 Champion 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 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 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 Champion'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 Champion, 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 Champion'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.