

28/02/2024

Fire Standard Board: Written Submission to the Senedd's Equality and Social Justice Committee Inquiry into Fire and Rescue Services in Wales

1. The Fire Standards Board is honoured to have been asked to provide evidence to the Senedd's Equality and Social Justice Committee. We hope that the Committee finds the contents of this written submission helpful. It is intended to form the backdrop to the oral evidence that the Fire Standards Board (the Board) Vice Chair, Alison Sansome, will give to the Committee.
2. While the Fire Standards Board's terms of reference are limited to England, and the Fire Standards are directly addressed to the 44 Fire and Rescue Services in that country, we have had contact both with the Welsh Fire and Rescue Services and Services operating in the other devolved nations. Recognising the collaboration that exists across borders, we have encouraged those services to engage with the Standards.
3. We believe the Standards demonstrate the professional considerations any Fire and Rescue Service in any part of the UK although the Fire Standards are based on English legislation. It is important to understand that Standards cannot be altered to reflect national considerations, but must remain intact as published.

The Fire Standards Board

4. In May 2016 the then Home Secretary, Theresa May, announced an ambitious fire reform programme aimed at making England's fire and rescue services more effective, professional, and accountable. The Government felt that the agenda needed to be owned by the sector empowering it to shape and deliver reforms and become self-transforming.
5. Included in this agenda together with the establishment of an inspection regime led by Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) was the creation of the Fire Standards Board. This body was tasked with developing a coherent and comprehensive set of professional standards for the Service. It was given the role to oversee the identification, development, and maintenance of professional standards for the benefit of the profession, the services and the public served by them. It began operating in 2019, and, following the work necessary to identify what areas of service activity required standards and the process for producing them, the first Standards were published in February 2021.
6. The Board's composition reflects its major stakeholders. In addition to the independent Chair and Vice-Chair, the Board includes the Chair of the National Fire Chiefs Council (NFCC); a representative each from the Local Government Association (LGA); the Police, Fire and Crime Commissioners Association (APCC); and the Home Office. All who attend do so as representatives not delegates. The list of 2023/24 Board members is at [Annex A](#).
7. The NFCC, which is itself a UK-wide organisation, provides both the Board's executive support, led by the Fire Standards Team, and access to subject matter experts who lead on developing the different standards. As neither the Board nor the Inspectorate are regulators, the responsibility for ensuring that Standards are implemented and their benefits achieved falls to the services themselves and their employers, who are represented on the Board by the LGA and the APCC.

8. The Fire Standards Board strongly believes that services should consider their improvement action plans holistically as it is likely the improvements required to achieve the outcomes of a Fire Standard may well correlate to areas for improvement identified through governance and audit.

The Suite of Fire Standards

9. The development of a Standard is thorough and consultative. Starting with a scoping and planning stage, there then follows development work including peer review leading to the Board agreeing to a public consultation on the draft Standard. Consultation responses received are analysed, with the Fire Standard Team producing a full report for consideration by the Board which explains why proposed changes to the draft have been accepted or rejected. The Board will consider signing off the Standard for publication once it has reviewed and is satisfied both with the final draft Standard and the conclusions of the Quality Assurance Report which is focused on commenting on the Standard's production process, noting any recommendations for possible improvements. Once approved, the Standard is launched with suitable communications together with an accompanying implementation tool. Thereafter information is continually gathered on the Standard's impact. The process from start to finish takes on average approximately six months to a year.
10. We appreciate the engagement of colleagues from Welsh Services who have contributed to both the development of Standards and responded to consultations. Their contributions have been beneficial. In addition, Welsh Fire and Rescue Service colleagues have attended workshops designed to help Services successfully embed the Standards.
11. The Board has recognised that it was important to publish a statement on its website outlining the Board's position with regards to the level of equality impact assessment undertaken when producing Fire Standards. The statement reads as follows:

"The Fire Standards are designed to be applicable to all fire and rescue services in England and for the wider benefit of local communities. Fire Standards are produced by the services for the services.

The Fire Standards Board is committed to listening and responding to a diversity of voices. Through its open consultation process, it welcomes views and feedback from those with differing backgrounds and experiences about its Fire Standards. With best endeavours, it considers all feedback as part of its development and approval process to ensure the standards will not directly or indirectly discriminate against a person or persons or negatively affect them.

Achieving the Fire Standards will support fire and rescue services in complying with their public sector equality duty under the Equality Act 2010, in particular that means their responsibility to; eliminate discrimination, harassment and victimisation, advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it, and to foster good relations between persons who share a relevant protected characteristic and persons who do not share it. The impact of this will benefit the fire sector and the wider community."

12. At the time of this review, 16 Fire Standards have been published, which can be found on the Fire Standards Board website by following this link: <https://www.firestandards.org/>. The expectation is that the initial suite will consist of around 20 Standards. The Board decided that four areas were better expressed not as separate Standards, but as cross-cutting themes reflected in several Standards, as appropriate. These cross-cutting themes are identified as: environment and sustainability; equality, diversity, and inclusion; health and wellbeing; and organisational learning.

13. Standards should not be seen as silo documents as their relationships produce positive synergies needed to achieve improvements. Separately and together, they help drive improved quality of service to support the safety, health, and wellbeing of communities. They act to enhance professionalism through consistent application, improved competence and diminishment in organisational risk. They enable services to collaborate effectively with other services across borders or nationally. They ensure better and greater accountability assisting governing bodies and operational leaders in assessing local performance. The outcome of achieving the Standards is a more positive Service culture and working environment leading to increased public confidence which can only add to maintaining trust in and the upholding of the Service's reputation.
14. Recognising that services can have very different demographics, geographies and challenges, the Standards are deliberately written to be principles based. Each begins with an outcome statement which states what good looks like. This is followed by what is required to achieve that outcome, the "how to" section. This directs services to the tasks they must, should, or may take to achieve the outcome. The Standard's remaining sections are: expected benefits of achieving the Standard; legal requirements or mandatory duties; linked qualifications, accreditations or Fire Standards; and guidance and supporting information. This material is published separately by NFCC and contains any necessary further details.
15. Services are encouraged and expected to work towards achieving the Standard's stated outcome through reflection and self-assessment and by avoiding simply treating Standards as a tick box compliance exercise. The Fire Standards Board anticipates that in many cases services may already be achieving much of what each Standard's outcome requires understanding that different services will have specific strengths and weaknesses. Every Fire Standard has a corresponding Gap Analysis Tool to support services with implementation. These help services assess how well they currently meet the outcome statement and to identify any additional actions required.
16. Whilst it is not mandatory for English Services to comply with the Fire Standards, England's National Fire Framework makes clear that Services are expected to pay due regard to them.
17. [Annex B](#) is a table which lists Standards which are especially directed in supporting a service's effectiveness, efficiency and care of its people.

Leading the Service, Leading and Developing People, Communications and Engagement, Code of Ethics Standard and Safeguarding

18. For the purposes of this inquiry, these five Standards merit particular attention. Considering the need to improve values and culture in the sector, the Fire Standards Board and the NFCC's Implementation Team have worked to focus Services on delivery of these Standards.
19. The two Leadership Standards were benchmarked against recognised leadership Standards, but, as with all Fire Standards, were put into a context suitable for fire and rescue services. The Leading the Service Fire Standard was developed to help leaders to self-reflect, lead by example and clearly articulate the expectations of those who lead within services, particularly their behaviours, ethics and the activities required in an ever changing world. It expects senior service leaders to set a compelling vision for their service and translate that into a comprehensive delivery plan. The Leading and Developing People Fire Standard concentrates on how services should attract and retain a competent workforce that is diverse, motivated, and engaged. That Standard also puts an emphasis on workforce development, health, and wellbeing. The NFCC Implementation Team has provided significant support in embedding these two standards within services.
20. The Code of Ethics Standard is coupled with the Core Code of Ethics for Fire and Rescue Services and seeks to ensure that Services embed and are committed to the ethical principles and professional behaviours contained in that document as evidenced by the attitudes and conduct of those who lead and who work for or on behalf of the service, with the service operating according to corporate ethical business practices.

21. Recognising that accessible, and inclusive communication and engagement are fundamental in building a positive working environment and culture and key in keeping communities safe, the Communication and Engagement Fire Standard clarifies the importance of these areas in all aspects of a fire and rescue service. It aims to ensure Fire and Rescue Services have defined approaches on how to strategically communicate to all stakeholders, both internally and externally. FirePRO, the membership body for communications professionals working in fire and rescue, developed the Standard, on behalf of the FSB, engaging with industry leaders both from the Chartered Institute for Public Relations and the Local Government Association
22. The Safeguarding Standard promotes the safeguarding of those in the community, employees, and volunteers. It seeks to encourage services to work proactively to reduce the risk of abuse, harm, and neglect. It is expected that services will be compliant with safeguarding legislation and fulfil their safeguarding obligations and responsibilities. It puts emphasis on staff being suitably trained, supported, and empowered to be able to respond adequately to safeguarding incidents as appropriate to their roles and responsibilities.
23. The Communication and Engagement Fire Standard (discussed above) and the Fire Control Fire Standard were both launched in April 2023. The development of the Fire Control Standard was influenced by major incident incidents such as Grenfell and the Manchester Arena bombing. It addresses the fundamental and strategic role that Fire Control plays from initially receiving the first contact through to the very close of an incident. This Standard's development drew on the expertise and wide knowledge of Fire Control in all operational service activity including the NFCC Fire Control Team, the NFCC Lead for Fire Control, the Mobilising Officers Group and control specialists from a wide range of Fire and Rescue services. The intention is for this Standard to assist in creating better resilience, greater strategic awareness and interest in Fire Control, improved levels of recruitment and retention and professional development opportunities.

Ongoing Work

24. During the year progress was also made on the production of several other Standards as described below.
25. Currently an Internal Governance and Assurance Fire Standard is in development and is expected to be published at the beginning of 2024/25. Another Standard in production is the Procurement and Commercial Standard, which we hope will be ready for publication by early Summer 2024.
26. Work on the provisionally titled Digital and Information Technology Fire Standard was initiated with a working group session to confirm the Standard's scope and to gather any related information to support early drafting work. Again, the Board is expecting to consider approval of this Standard in summer 2024.

Responding to HMICFS' Spotlight Report on Culture and Values' Recommendations

27. In March 2023, HMICFRS published its Spotlight Report on Culture and Values. This contained three recommendations directed to the Fire Standards Board which referred to safeguarding measures, staff disclosures, complaints and grievances and misconduct. This led to the Board determining that to meet these recommendations moderate changes were needed to three Standards - Leading the Service, Leading and Developing People, and Safeguarding. The necessary changes were made by including additional guidance and supporting information, linked qualifications, and, in the case of the Safeguarding Fire Standard, additional material to reflect changes in primary legislation. The revised Standards were republished on the Fire Standards Board website.

Future Plans

28. If the production of Standards mentioned above proceeds as expected, it is anticipated that the initial suite of Standards will be completed during 2024/25. In addition, the Fire Standards Board has three priorities for the coming year. First, to begin its scheduled review of published standards to ensure they remain relevant and current. Second, to concentrate through enhanced communications and engagement the successful incorporation of the Standards and gain insight into the benefits for services by their implementation. It is apparent from feedback that whilst some services are making excellent progress towards achieving the Fire Standards, there is more to do in supporting services in achieving this. Third, to be sensitive to the possibility that there may be other areas where Standards might be beneficial.

How to find out more

29. The Fire Standards Board publishes information about its activities on the following channels – website (www.firestandards.org), twitter and linkedin. The website contains a number of short videos featuring Fire Standard Board members explaining how the bodies they represent on the Board contribute to developing and delivering the Standards.

Suzanne McCarthy

Alison Sansome

Independent Chair and Vice Chair, Fire Standards Board

28 February 2024

Annex A: Fire Standards Board Membership


The Board has a Chair and Vice Chair, both independent from Government and the fire and rescue

The membership of the Fire Standards Board is as follows:

- Suzanne McCarthy, Independent Chair
- Alison Sansome, Independent Vice-Chair
- Ben Adams, Police, Fire and Crime Commissioner for Staffordshire, representing Association of Police and Crime Commissioners
- Yvette Bosworth and Suzie Daykin Home Office
- Greg Brackenridge, Local Government Association
- Mark Hardingham, Chair National Fire Chief's Council

Annex B: Efficiency, Effectiveness and People Standards

Questions v approved and proposed Fire Standards



<p style="text-align: center; background-color: #c00000; color: white; padding: 5px;">How effective is the FRS at keeping people safe and secure from fire and other risks?</p> <ul style="list-style-type: none">• Community Risk Management Planning• Emergency Response Driving• Fire Control• Prevention• Protection• Operational Response x 3• Emergency Preparedness and Resilience (local, regional national)• Code of Ethics• Communication and Engagement• Safeguarding	<p style="text-align: center; background-color: #666; color: white; padding: 5px;">How efficient is the FRS at keeping people safe and secure from fire and other risks?</p> <ul style="list-style-type: none">• Community Risk Management Planning• Data Management• Fire Investigation• Safeguarding• <i>Procurement and Commercial</i>• <i>Internal Governance and Assurance</i>• <i>Digital and IT</i>	<p style="text-align: center; background-color: #c00000; color: white; padding: 5px;">How well does the FRS look after its people?</p> <ul style="list-style-type: none">• Leading the Service• Leading and Developing People• Code of Ethics• Safeguarding• Communication and Engagement
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* Standards in italics are still in development.