



HM Fire Service Inspectorate

Report to:	Director for Safer Communities Scottish Government
Date:	December 2020
Report By:	Simon Routh-Jones HM Chief Inspector of the Scottish Fire and Rescue Service

Subject:	Update report on the Scottish Fire and Rescue Service's planning and preparedness for exiting the European Union
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1. Purpose

This report has been provided by HM Chief Inspector of the Scottish Fire and Rescue Service to the Director for Safer Communities on behalf of the Scottish Government (SG), and provides a follow-up report on the Scottish Fire and Rescue Service's (SFRS) readiness for exiting the European Union (EU).

A report was presented on 18 March 2020 that focused on a 'No Deal Brexit'. Whilst negotiations to secure a deal are still ongoing, the respective governments have until 31 December 2020 to agree the terms of a trade deal. What is clear is that the SFRS must make a reasonable assessment of the likely outcome and plan accordingly. Both the public and SG will expect the Service to be able to respond to emergency calls and deliver its Statutory Duties as contained within the Fire (Scotland) Act 2005.

2. Background

In 2018, the SFRS started its formal planning and preparation for an exit of the EU. Much of its early work was paused in 2019, as it waited for clarity from the UK Government on the details, risk and opportunities that may emerge during the transition arrangements. This work was then overshadowed in 2020 by the global pandemic Covid-19 (C-19). Whilst some work has continued on exiting the EU, it is not surprising the focus of the SFRS and other Local Authority partners has been directed at managing within the C-19 pandemic.

The original governance arrangements that were established to manage exiting the EU, have been replaced by the Covid-19 Tactical Action Group (COTAG). COTAG was initially established to manage C-19, however it was soon recognised that the concurrent nature of events being planned for by the SFRS would lead to a significant duplication of work for staff. The terms of reference for COTAG were extended and cover 'exiting the EU' as a sub group.

A Senior Responsible Officer (SRO) at an Executive level has been appointed by the SFRS to oversee the development and delivery of a high level EU exit plan which is informed by the overarching UK Government and Scottish Government Planning Assumptions. The primary focus of the high level plan is to ensure the SFRS is able to maintain operational service delivery and meet its statutory duties.

The information and evidence provided has been gathered from meetings with senior management from the SFRS, regional resilience partners and representative bodies.

3. Findings

The SFRS has been using the National Planning Assumptions in preparation for exiting the EU and has consulted with SG, Police Scotland, other key stakeholders and agencies to develop plans and priorities.

In early December 2020, there are still ongoing discussions between the UK Government and its European counterparts to finalise a trade agreement. The lack of clarity at this time places additional risk on any proposed arrangements and plans that have been prepared.

3.1 The Operational planning assumptions for the SFRS to deliver its statutory duties:

The SFRS was originally planning to deliver 100% availability of its operational resources in the event of a 'No Deal' EU exit. Organisational learning during C-19 has led to the production of an appliance withdrawal policy. This document provides detail on how the SFRS will utilise its available resources at any time, and covers a wide range of reductions going down through four tiers of attrition to a minimum level of appliance availability. This change to the original planning assumption considers all reasonable foreseeable staffing issues (Appendices A).

We have seen that the corporate risk register has been regularly updated and risk levels adjusted to reflect changes in the information that is available at the time.

3.2 Details of the workforce planning and the capacity arrangements to deliver the Operational Response Model:

The SFRS has a range of plans, policies and procedures available to mitigate the potential risks to the service delivery Operational Response Model. Planning assumptions and lessons learnt during C-19 are included. The recent experience during C-19 is a good baseline for SFRS to be assured of its preparation (Appendices B).

3.3 The Business Continuity Management plans and resilience arrangements in place to deal with the potential of medium to long term disruption to Operational effectiveness:

The SFRS has been planning in line with the SG forecast for a reasonable worst case scenario of 3-6 months impact/disruption if there was a 'No Deal' Brexit. The SFRS has also considered and is aware of the impact this may have on revenue budgets and future forecasting.

The SFRS has previously and more recently had opportunities to test its Business Continuity Management Planning (BCMP) arrangements and the ability to deal with concurrent events. Events include C-19 pandemic, Severe weather (12 August 20), and Bonfire night response. These events have provided opportunities for the Service to learn, review and adapt its BCMP arrangements.

3.4 Detail in respect of the planning arrangements with regard to the Fire (Scotland) Act 2005, Chapter 6 of Part 2 Mutual Assistance:

The SFRS has reviewed and updated the existing mutual assistance arrangements of the Fire (Scotland) Act 2005. Both Northumberland FRS and Cumbria FRS provide mutual aid. Specialist assistance from the National Fire Chiefs Council for access to specialist TAC advisors and National Co-ordination Advisory Framework assets is also available.

3.5 The Governance Structure in place to deliver the Operational Response and Resilience arrangements:

The SFRS has a robust governance and reporting structure in place to ensure it has the relevant scrutiny and oversight of the planned Operational Response and Resilience arrangements. COTAG has responsibility for overseeing all EU exit issues as a concurrent event alongside its primary management of C-19. Progress against the plans is routinely reported to the Senior Leadership Team (SLT) meetings.

3.6 Procurement/Supply Chains:

The SFRS could be severely impacted by shortages and increased costs of EU supplies due to delays at borders/ports impacting on imported goods from the EU which is a key issue for the Service as are issues affecting contracts and contract management. This could impact on the SFRS's operational effectiveness and resilience as firefighters cannot be deployed without appropriate Personal Protective Equipment (PPE), with the potential for operational equipment and fire appliances to be unavailable if spare parts cannot be provided.

To reduce the risks identified the SFRS has analysed each of its high risk work streams and put the following plans in place:

Property: Risk is loss of power/heat on stations with the supplier unable to deliver parts to maintain or repair.

The SFRS will use back-up diesel generators to power some fire stations and is actively working to understand energy suppliers' contingency plans. If required, it plans to deploy normal business continuity planning to use back-up generators with additional emergency generators being available via Property.

Fleet: Risk of appliances not being available for operational response due to a lack of parts.

The SFRS is holding 11 extra appliances for strategic reserve (in addition to normal levels of 42) to be used when required, and is now stockpiling fast moving parts. There are supplies of tyres for appliances with Kia tyres now in stock for emergency response vehicles. Four ISO containers are being used to store additional consumables and spares, these are located in Dundee, Hamilton, HQ and Inverness. There is six months' stock of hydraulic rescue equipment and Draeger (the Breathing Apparatus supplier) has highlighted a new UK warehouse for Breathing Apparatus equipment to be stockpiled.

Fuel: Lack of fuel could result in appliances not being able to respond.

Bunkered fuel is available at a number of the SFRS stations and is available for response vehicles. We are aware that fuel bunkers are to be restored to their maximum level and instructions to use fuel from garage suppliers until early January 2021 to preserve the services capacity. The SFRS has 9 fuel bowsers that each hold 1000 litres of fuel, these are available to transfer fuel if required.

PPE: Personal Protective Equipment and equipment may not be available for firefighters.

The replacement of new firefighter PPE is in the final stages of delivery, approximately 13000 sets of fire kit have been issued across the SFRS and approx. 7.3% are awaiting delivery. No issues or concerns were raised during our discussion with senior staff.

Water: Disruption of water supplies may lead to firefighter dehydration at incidents.

The SFRS is stockpiling supplies of bottled water. The amount of water needed will be dependent on a number of factors including; the scale and type of incidents attended as well as the ambient temperature. Stocks of water are to be stored at strategic sites and all operational staff have been issued with a refillable water bottle.

ICT: If the ICT systems fail, Operations Control (OC) sites could fail to mobilise resources to incidents.

Multiple contingencies are already in place and plans tested. This includes secondary facilities for the three OC sites. The Head of Operational Control is aware of the fragility of the legacy system and is waiting for the replacement mobilising system project to deliver in the summer/autumn of 2021. The SFRS has confirmed that there are no issues with its network supplier 'Airwave' as it is a UK based company, and already has sufficient levels of resilience built into the legacy network.

Contracts: There is risk of contract variances and increased costs in the life and the end of existing contracts.

We received assurance that a review of current contracts has been undertaken. No issues have been highlighted, however, it is acknowledged that if contract costs were to change significantly, there are options available to the SFRS to vary and re-negotiate contracts.

4. Conclusions

A series of remote interviews were carried out with senior managers within the SFRS, representative bodies and partners regarding the SFRS's preparedness for 'exiting the EU', this was done in conjunction with our work reporting on C-19. At the time of the inspection the SFRS was carrying out a review of its exiting the EU documentation, and there was no opportunity for the Inspectorate to review the revisions.

The uncertainties that remain in regards to any final trade deal will influence and impact on the preplanning and preparedness of the SFRS.

The review concentrated on three specific areas; Planning and Preparedness, Operational Service Delivery/Resilience and Procurement/Supply Chains. This was designed to ensure the Service is able to maintain its operational effectiveness and deliver its statutory duties during a period of uncertainty.

Her Majesty's Fire Service Inspectorate believes there is sufficient information available to support the SFRS strategic planning assumptions and necessary mitigation that will enable the Service to deliver its statutory duties.

This evidence is summarised in the key findings below:

Key Findings:

- We recognise there has been a significant amount of work undertaken to consider the wider implications to the SFRS as we approach an exit of the EU, should a 'No Deal Brexit' occur.
- This has resulted in robust planning and engagement that has involved the SG, Civil Contingency partners, key stakeholders and other agencies.
- We believe the SFRS has identified the most reasonably foreseeable and appropriate risks associated to exiting the EU, a 'No Deal Brexit' could have a detrimental impact on their planning assumptions.
- Experience gained in 2020, in managing C-19 has ensured plans have been reviewed, tested and lessons learnt. The SFRS has put reasonable mitigation in place to reduce the risks identified to a tolerable and manageable level.
- It is evident that extensive planning has also taken place to reduce the potential risk of essential goods and services and other supply chain issues, not being available to the SFRS.

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Appendices A

The Service has considered a number of potential possibilities that may impact on staff being available for work. The following areas were previously identified as requiring scrutiny and comments in *italics and underlined in blue* have been added to give context:

- Staff commuting home from holidays potentially being delayed at European airports or ports.
The number of staff affected is likely to be much lower than previously assumed as there are few airlines and holiday destinations open for business.
- Concern with regard to the increase in cost of fuel and food which may have an impact on staff being unable to afford to travel long distances to and from work locations.
A large proportion of staff in SFRS have been working from home therefore the impact is likely to be less than previous assumptions.
- Potential risk to Operational resilience relating to staff being unable to attend work because of illness or child care issues.
This continues to be a risk, but the risk has been managed during the C-19 pandemic.
- The threat of significant public disorder or other disruptions that may impact on the SFRS's ability to mobilise, attend and resolve operational incidents.
Police Scotland monitor changes to threat levels using intelligence led modelling, no significant risk has been identified to the SFRS.
- Concern for prolonged officer support to the Multi Agency Co-ordination Centre and Resilience Partnerships over a significant time period.
Planning for C-19 has identified a likely impact on the Flexi Duty Officer cohort with plans to increase capability utilising recently retired staff.
- Possible increase in fire loading within some premises caused by businesses stock piling goods.
This continues to be a risk as it is every year, during the Christmas period in some areas of retail.

Appendices B

The recent experience and organisational learning of the SFRS during C-19:

- The national event operations plan for EU exit was originally a standalone plan.
It is now a concurrency event plan.
- Assumptions are not always outcomes realised i.e. C-19 expectation of high levels of staff non availability.
Absenteeism at its lowest levels of sickness even compared to BAU.
- Plans need to be flexible to meet local needs and the organisation must be agile enough to amend plans if the impact is likely to be problematic.
Examples are available of how plans were adapted to ensure impact was appropriate.
- A range of management interventions to deal with limiting organisational impacts. i.e. use of overtime, shifts contractually owed by staff to the Service, cancelation of training courses.
These management tools are available to ensure staffing levels are maintained.
- Limit the movement of appliances, supported by intelligence led mobilising.
This will reduce fuel consumption and reduce road risk.
- Resilience and fallback arrangements are in place between the three SFRS OC sites to receive and process calls.
BCMPs have been recently tested to provide assurance on the SFRS ability to handle requests for service.
- Fire Safety enforcement officers are to be used to identify premises with increased fire loading that may present a risk to Firefighter safety.
Enforcement is a last measure to ensure compliance, advice and guidance will be provided as required.
- In response to C-19 recently retired staff in many roles from Firefighter, Firefighter (OC), specialist officers have been contacted and may be re-engaged to augment staff levels.
The provision provides additional capacity to maintain staff levels.