



HM Fire Service Inspectorate

**Integrity, Objectivity,
and Fairness.**



**An Overview of
the Scottish Fire
and Rescue Service**

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Summary

This report presents an assessment of the Scottish Fire and Rescue Service (SFRS) in an early stage of its existence. In summary, we examined the early transition of fire and rescue services in Scotland into a new national body and how the new management of the Service by the Board and Strategic Leadership Team is dealing with the complexity of reform whilst maintaining the delivery of 'business as usual'.

The Scottish Government is keen that reorganisation of fire and rescue services in Scotland into a single national body is used as an opportunity to maximise the benefits of reform, and wishes the SFRS Board to be ambitious in its aims. Therefore we also consider how well plans for the future of the Service are being set out. In addition, the Board asked us to make comment on the general direction of travel at this early stage.

All the members of the inspection team contributed to the development of this report and the quality assurance panel provided a professional challenge to the contents, assumptions and conclusions made. However, the Chief Inspector takes sole responsibility for the report, its contents and conclusions.

The key points we wish to make in this report are:

Overall

- The process of combining eight fire and rescue services and one fire service college into a single organisation is complex and time consuming. We acknowledge that our inspection of the Service, taking place as it did in a transitional phase for the organisation, would inevitably disclose areas where work would be at an early stage. There are parts of this report where, for the record, we have commented on issues where further work is required before the Service will have achieved a settled state: this should not however be seen as a negative reflection on the hard work that has already been done towards achieving these goals. Generally, we are satisfied with the progress the Service has made and the lack of disruption being caused.
- We give credit to the Board and Strategic Leadership Team for the progress which is being made and for the fact that the Service plans to complete its first year within its allocated budget. Within all of that complexity, there are some issues that we wish to call attention to and these are set out in some detail in the body of this report and collected together in chapter 4.
- The Scottish Fire and Rescue Service is on a journey of change. Our opinion at this stage is that the direction of travel looks good but that the Service is, understandably, closer to the beginning of its voyage than the end.

The impact of transition on service delivery

- To the best of our knowledge, the transition process has had no adverse effect on operational response. The complex work which is required to establish new staffing structures, particularly in the Prevention and Protection area of the Service, mean that delivery of these services is not yet optimised.

- The Service has made significant inroads into reducing duplication but the geographical distribution of remaining staff means that, in the short term, specialist staff may not be in the best locations.
- Specific pressures are affecting control staff in light of the likelihood of rationalisation. Particular attention will have to be paid to staff retention and engagement to avoid any degradation of service delivery pending the finalisation of control structures and staffing.
- The delivery of prevention initiatives is continuing, particularly Home Fire Safety Visits. The creation of national targets for their delivery is to be welcomed, but monitoring should continue to be used to build up consistency and ensure that high risk individuals are being appropriately targeted across the Service.

The effectiveness and capacity of the new management and supervision arrangements

- Relationship building and the interaction between the SFRS Board and the Service's senior leadership is being approached positively but is only now beginning to support detailed consideration of a longer term strategic direction, and therefore that direction is not yet clear.
- The Service has established its management structure at the most senior levels, but beyond that it is still to resolve its longer term structure, leading to some uncertainty among those middle managers who are affected and occasional lack of clarity about reporting lines – but with no significant adverse impact on service delivery. The decision to leave some former reporting lines in place on an interim basis has allowed SFRS to ensure business as usual.
- An overarching national performance management framework is still in a relatively early stage of development. Self-assessment is developing well and the Service is actively trying to embed that to inform national policy direction. Senior officers are working to establish a nationally consistent performance culture.

The extent and degree of clarity with which the Service has set out its plans to deliver the agreed benefits of reform

- The long-term strategic direction of the SFRS is only beginning to emerge at this point. Strategic planning could be improved through more detailed description of the measures that will be applied to meet the targets in the Fire and Rescue Framework.
- It is crucial that the work which is currently ongoing to pull together a large range of Directorate projects is completed, and the transformation work is overseen and coordinated by the Programme Board and Service Transformation Committee. We would encourage the ongoing development of a programme management function and its integration into the Service.
- Financial management is key to the effective operation of the new Service – the Service's senior leadership appears to be well focussed on finance and budgets.
- The Service is currently reviewing its specialist rescue capacity, but is some way from establishing its role as a champion of specialist rescue.

- During the development of this inspection report, we paid particular attention to the former **Highlands and Islands Fire and Rescue Service area**. Our observations appear within the main body of the report, but in summary are:
 - Business continuity in the former Highlands and Islands Fire and Rescue Service area is not yet assured. We have identified a number of issues that require ongoing monitoring to ensure that the special measures in place before SFRS was established do not suffer loss of momentum. In particular:
 - Operational Risk Information available to firefighters has not yet reached a satisfactory standard. The current service-wide project to address this issue should be encouraged and sufficient resources made available, particularly in the North Service Delivery Area, to ensure that this work is carried out as soon as is reasonably practicable.
 - During our November 2012 inspection, we noted that Highlands and Islands Fire and Rescue Service was being supported by training officers and fire safety enforcement officers from other fire and rescue services, channelled through the Peer Support Team. We pointed out that sustaining an increased level of support would be particularly challenging for the new Service. The Service is currently reporting high activity levels for key training, but with a review of the training structure currently underway, it is not yet clear that the Service will be able to deliver a permanent increase in training resources.

1 About The Service

The Scottish Fire and Rescue Service was fully established on 1st April 2013 as the national fire and rescue service for Scotland, combining eight predecessor fire and rescue services and the Scottish Fire Services College.

The reform of fire and rescue services in Scotland that led to the creation of the SFRS is intended to be aligned¹ to the outcomes of the Christie Commission on the Future Delivery of Public Services in Scotland². The aim is to provide a delivery model to secure continued and sustained delivery of fire and rescue services to communities across Scotland, to realise further improvements to service delivery, and to secure the efficiencies required to accommodate the financial challenges facing Scotland's public services.

The predecessor fire and rescue services had operational and organisational autonomy within their local areas, including independent sets of executive and command staff and back office functions. Reform of the Service sought to eliminate this duplication of functions, while at the same time promoting the sharing of operational resources outside the geographical areas in which they were based and improving on local engagement and partnership working.

The predecessor organisations had different governance structures. Two of these services were part of local authorities: Dumfries & Galloway, and Fife. Six were accountable to joint boards which covered more than one local authority area: Central Scotland, Lothian & Borders, Grampian, Highlands & Islands, Strathclyde, and Tayside. The Scottish Fire Services College was owned and operated by the Scottish Government.

The SFRS is a single corporate body which has been established as an 'Other Significant National Body'. It is governed and managed by an appointed Board and a Strategic Leadership Team working in close cooperation. The Board consists of the Chair and currently 11 members all of whom were appointed by Scottish Ministers in October 2012.

For service delivery purposes, the SFRS is organised into three Service Delivery Areas (SDAs). North SDA HQ is based in Aberdeen, East SDA HQ is based in Edinburgh and West SDA HQ is based in Hamilton. Each SDA has a number of Local Senior Officers (LSOs) responsible for managing the resources within their area to provide engagement with the local authority, and to deliver response and community safety strategies. There are 17 LSOs across the three Service Delivery Areas.

¹ Outcome-focussed, support local integration and partnership, and improve fire prevention
² Scottish Government, *Reform of the Fire And Rescue Service in Scotland: Outline Business Case*, September 2011

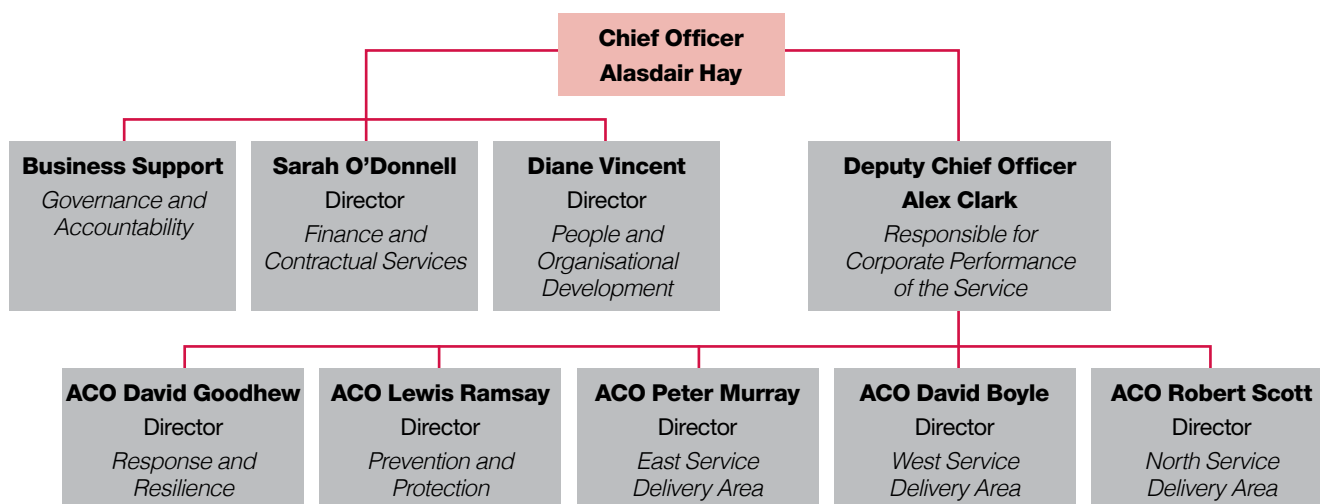


Figure 1 – organisational chart for the SFRS

The new combined Service inherited substantial assets from its predecessor organisations, including eight service headquarters and control rooms, 359 fire stations (74 wholetime, 4 day crewed, 238 retained duty system (RDS) and 43 volunteer), 449 fire engines, 171 other operational appliances and 895 other vehicles³. The SFRS has just under 9,000 staff supporting its service delivery to the Scottish community. It serves a population of 5.3 million people living in an area of 30,414 square miles, ranging from heavily urbanised and industrial landscapes to rural, remote and island communities. The SFRS annual budget for 2013-14 is £292.5 million. In addition, SFRS carried forward committed capital reserves from local government and has access to additional funding from Scottish Ministers specifically for transitional projects to assist the service in moving from the eight legacy services to a single national one.

The SFRS has benefited from the fact that its eight predecessor organisations agreed two protocols – one on appointments and the other on core workforce management issues. As a result, the new Service is in the process of delivering a relatively smooth staff transition. The Service has made some important early moves in reducing staff posts – examples include:

- (1)** 116 fixed term employee contracts were ended on 31st March 2013.
- (2)** There were 94 flexi-duty officers in temporary posts in predecessor services. Following the introduction of a new duty system on 2nd September 2013, 28 flexi-duty officers reverted to their substantive post and a further 25 temporary flexi-duty officers reverted to non-flexi posts.
- (3)** Prior to the introduction of the SFRS, the predecessor services approved 48 voluntary severance packages to support staff at the request of the SFRS.
- (4)** In August 2013, 18 staff transferred into wholetime firefighter posts via a recruitment campaign that was accessible only to support staff. A further 16 support staff are currently on standby to transfer into wholetime posts at the next recruitment intake.

³ All figures as at 31st March 2013

In addition to the establishment reductions and changes outlined above, a total of 149 other employees have left the SFRS since 1st April 2013. Of these, 23 were support staff.

The scale and the nature of the work done by the fire and rescue service in Scotland is changing over time. The number of emergency incidents attended by the Service is reducing over a sustained period – although the rate of fires and fire casualties per head of population is substantially higher than that in England and Wales. Chart 1 shows the trend in fires over 10 years. During 2012-13, the Scottish fire and rescue services responded to 26,600 fires, about 40% of which were categorised as ‘primary’ fires (generally, fires involving buildings and vehicles). 46 people died in fires and there were 1,311 non-fatal casualties⁴.

The recorded decrease in fire activity may be offset, at least in part, by other activities which have been undertaken by the SFRS and its predecessor services including specialist rescue, response to false fire alarms due to apparatus and community activities such as Home Fire Safety Visits. We have not, however, considered the relationship between the numbers of these activities in any detail for the purposes of this report.

Scottish Fire Statistics

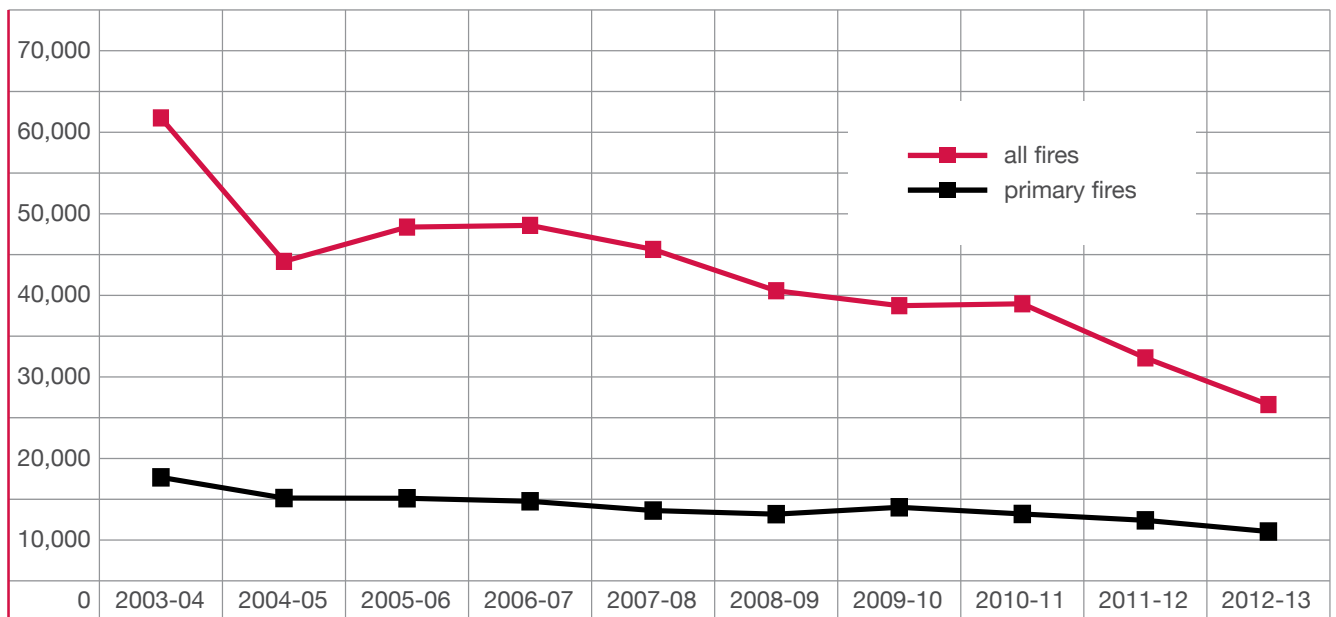


Chart 1 – the number of fires and primary fires over a 10 year period⁵.

The powers and duties of the SFRS are set out in the 2005 Act which was substantially amended by the Police and Fire Reform (Scotland) Act 2012. SFRS also works within the Fire and Rescue Framework. The Framework reaffirms the aims of fire reform, sets strategic priorities and objectives for SFRS, and also sets quantitative targets, based on statistical performance indicators, for SFRS to aim towards.

⁴ Scottish Government, *Fire Statistics Scotland 2012-13*

⁵ Scottish Government, *Fire Statistics Scotland 2012-13*

2_ Why We Inspected

Her Majesty's Fire Service Inspectorate in Scotland (HMFSI) is a body that operates within, but independently of the Scottish Government. Inspectors have the scrutiny powers specified in section 43B of the 2005 Act. These include inquiring into the state and efficiency of SFRS, its compliance with Best Value, and the manner in which it is carrying out its functions.

The legislation that created the SFRS also redefined the role of HMFSI, with the intention of providing a robust and fit-for-purpose body that could provide assurance to Scottish Ministers and to the public about the functioning of the new Service.

An inquiry by the Inspectorate can be self-directed or can be subject to direction by Scottish Ministers. This Overview Inspection of the Scottish Fire and Rescue Service is self-directed by the Chief Inspector.

Reform of fire and rescue services in Scotland is intended to protect the Service at a time of reducing public sector funding and, at the same time, produce benefits for the community. With that comes an inevitable element of risk associated with the changes to the way in which services are delivered. We therefore consider it important, at an early stage, to inquire into the broad functioning of the new Service, to establish what effects reform is having on service delivery.

The purpose of this inspection is accordingly, to gain an overview of the functioning of the SFRS and in particular:

- To assess the impact of transition on service delivery;
- To assess the effectiveness and capacity of the new management and supervision arrangements in relation to monitoring performance and providing quality assurance;
- To gauge the extent and with what degree of clarity, the Service has set out its plans to deliver the agreed benefits of reform.

In the Summary of this report above, we have emphasised that this inspection took place at an early stage of the transition of the predecessor services into the SFRS. We understand that we are not seeing, or commenting on, mature structures and processes and any comment we make in this report must be read in the context that the SFRS is still evolving as an organisation and that a range of issues which we have captured may well have moved on come the publication of this report.

This inspection is intended to identify emerging issues for the Service and allow the Chief Inspector to make comment on them. It also provides a source of evidence and a base line for future work. HMFSI is committed to a proportionate and risk-based program of scrutiny work, and amongst other things, the outcome of this inspection will inform the Inspectorate's risk assessed planning for future inspection activity.

3 Our Findings

In this part of the report, we record and comment on what we found during the course of our inspection. This Chapter is divided into sections that discuss each of the aims of this inquiry, as described in Chapter 2.

It is of particular interest to us to examine whether the reform process has had immediate, short-term impacts on the delivery of fire and rescue services in Scotland. For that reason, the first four sections of this Chapter look at the impact of transition on the four main service delivery areas of Operational Response and Command and Control; Legislative Fire Safety Enforcement; Community Safety; and risk critical Learning and Development.

In the following sections on ‘Management and Supervision’ and ‘Reform Process and Plans’ we draw together the findings of our inspection from across the Service relating to those subjects.

3.1 The Impact of Transition on Service Delivery – Operational Response, Command and Control

Structure & Management

This part of the report focusses on the Response and Resilience Directorate which is responsible for all operational functions of the SFRS. The Directorate consists of a Headquarters team and teams within each of the Service Delivery Areas (SDAs).

The Response and Resilience Directorate recognised that a detailed structure issued within the first few months of the new Service forming would assist in communicating roles and responsibilities to staff. Staff have found this to be extremely useful and as a result we found little confusion regarding roles and responsibilities. As can be expected at this early stage in the development of the new Service, there are some areas of the structure that require more time to become fully embedded, particularly around the links between the Response and Resilience Directorate staff and the staff within the SDA/LSO areas.

It is clear that middle managers in post at the time of our inspection have played a significant role in the successful transition of the SFRS thus far. However, the effect of reducing flexi-duty managers in September 2013, and the implementation of the Service’s matching and transfer policy in early 2014, is as yet untested in terms of middle management capacity to manage incidents and at the same time to provide other management functions required of any large organisation. It is important that the capacity of this group to provide both incident command and other management functions is factored into any further revision of the middle management layer.

The workload within the Response and Resilience Directorate is substantial and covers a wide scope of service activities. There was some concern expressed at the flat structure beneath the Director and the uncertainty about reporting lines when the Director is absent. Area Managers working within the Directorate, as well as Coordinators within the SDAs, point out that they are not the Directors’ deputies, although this is often assumed by staff.

There is evidence to suggest that the impact of transition is being mitigated by adopting effective workforce planning and through providing a business case for staff retention in key areas, for example, the maintenance of temporary Group Managers in Orkney and Shetland.

Specialist Resources

Since the 1st of April 2013, all SFRS control rooms now share information on SFRS specialist resources and their locations: however at this time, the work is in its infancy. To ensure specialist resources are utilised, they should be configured within the command and control systems and control staff need to understand when a specific resource should be included within a response.

Within the former Highlands and Islands area, work has begun on configuring specialist resources within their command and control training system. This work is encouraging as it supports one of the benefits of the SFRS as outlined within the Framework document.

Response and Resilience Interoperability

Many of the management arrangements established by the predecessor services remain in place with the intent of ensuring business as usual is maintained during transition. There is no evidence to suggest any detrimental changes to service delivery: indeed there are examples of initial improvements such as access to specific specialist resources. For example, the newly formed Fire Investigation Team based in the North SDA (Aberdeen) was deployed to an incident in Orkney to provide full investigative support to officers on the island, as they worked with Police to identify the cause of the fire.

The removal of the 'borders' around the predecessor services has provided an opportunity for the Service to review response arrangements and make changes to allow the closest resources to be deployed to an incident. One such area is in Kincardine in Fife where the response arrangements have been changed. This improvement to community and firefighter safety is highlighted below in a case study. Risk modelling is providing the Service with other locations where changes to the service response need to be considered.

Improvements to Interoperability

The eight predecessor services and their associated fire controls worked largely in isolation with the exception of a small number of occasions where mutual support was provided. Early work within a reform Fire Control project identified areas of the country where improvements to the fire service response could be made. One area highlighted was the operational response in the Kincardine and west Fife area.

Kincardine is a small town located just inside the Fife county boundary with Clackmannanshire. Prior to 1st March 2013, an incident in Kincardine requiring two fire engines would have resulted in one fire engine from Central Scotland FRS (Alloa) and two from Fife FRS (Dunfermline) attending.

The Fire Service Emergency Cover Model (FSEC) highlighted that Dunfermline took on average 18 minutes to reach Kincardine, with Alloa, Falkirk and Larbert all being able to reach Kincardine within 10 minutes. Using this information, it is clear that there are significant benefits to firefighter and community safety in changing the pre-determined attendance for incidents in the Kincardine and West Fife locality.

As a result, an incident requiring two fire engines is now resourced from the former Central Scotland FRS area. This significantly reduces the attendance time of the second appliance. Operational risk information is shared across the former Fife and Central Scotland FRS to ensure key risk critical information is available to responding crews on their mobile data terminals.

Control Rooms and Rationalisation

A new managerial structure is in place for control rooms: a Group Manager has been appointed in each SDA, and two further Group Managers form part of the structure with responsibilities for Learning and Development and Technical Communications. An Area Manager in the Response and Resilience Directorate has the responsibility for Operations as well as responsibility for the strategic management of controls, whilst the Area Managers within the SDAs have responsibility for day to day management.

The Control Group Managers are working jointly across the three SDAs. However, they are mainly determining their own objectives and priorities within their SDAs in the absence of an overall strategic direction for the control room function across the Service. The Control Group Managers are not as yet working to a clear set of national priorities: this may be explained in part by the ongoing discussion over the future of control rooms in Scotland, but it underlines the importance of structured programme management in this area.

As expected the new appointees all displayed an enthusiasm to contribute towards the SFRS, and at this time they are developing their roles and creating relationships with each other and line managers.

There is an increase in communications between the control rooms due mainly to the roll out of Control Operating Procedures such as a Daily Incident Briefing Report. This briefing includes all incidents attended by the SFRS within a 24 hour period and input from every control room is required to compile this.

The SFRS is reviewing the location and capability of all existing control rooms. This has understandably created uncertainty amongst staff and we did find that morale is affected. The main issue raised by all the staff interviewed was the desire for clarity regarding the proposed number and location of control rooms. Of the staff interviewed during the inspection, many expressed frustration at a lack of communication in relation to the future of control rooms in Scotland.

Despite this background of uncertainty, all the staff we spoke to remained focussed on delivering the highest quality of service to the public. In addition to the review of the control room arrangements, there are a number of pressing challenges facing control staff at this time including:

- Control rooms running under their established staffing levels
- Long-term sickness levels
- Control staff moving to wholetime firefighter posts


The impact of these emerging staffing pressures is not equal across the current eight control rooms, due to a number of reasons including undertaking a differing range of duties outside their core function; performing reception duties due to the loss or redeployment of reception staff; different staff numbers, and differing levels of long-term sickness.

Operational Policy and Procedure

The task of rationalising policy and procedure throughout the Service is a major challenge which requires careful planning.

A significant amount of work had been carried out prior to the formation of the new Service, and this has been taken forward by the Response and Resilience Directorate. This identified the magnitude of the task to rationalise the existing operational policies and procedures. Staff pointed out the significant workload involved in developing policies and procedures for the new Service, and agreed that this has to be carefully managed to ensure all staff are aware of the changes, but at the same time not overwhelmed by the amount of information.

The initial deployment of a number of different doctrinal publications, including Standard Operating Procedures (SOP), General Information Notes, Control Operating Procedures (COP), Technical Information Notes, and latterly Urgent Operational Instructions, has led to significant concern amongst staff at all roles about the ability of individuals to absorb the amount of information being presented. Staff within the Retained Duty System expressed particular concerns about their ability to digest the new information and keep pace with their training demands. This concern has of course to be balanced against the Service's duty to provide standardised information and guidance to operational crews and the risk to the Service should it fail to do so.



The majority of changes instigated by Response and Resilience have an impact on control room processes, and in some cases, require significant alterations to command and control systems. There has been significant effort by control staff to get the new procedures in place – this has not always been possible, with interim procedures having to suffice until control systems can be updated. However, some members of staff did express concern that they are overloaded as a result of dealing with business as usual and having to incorporate the new operating procedures and processes. During our inspection we found that some control rooms did not have the capacity to absorb this additional workload. We suggest that prior to the introduction of new operating procedures, an impact assessment should be conducted on each control room.

In many cases, routine training has ceased so that control room staff can concentrate on the implementation of the new procedures. If this continues for a prolonged period, this could be detrimental. In some control rooms, staff are currently required to take on additional roles such as reception duties; this is increasing their non-emergency work significantly. It is important that SFRS reviews the practice of control room staff undertaking additional duties that may impact on their core business of taking emergency calls.

Additionally, concern has been raised at the short timescale available to staff to absorb the new information before the go-live date. The Incident Command SOP was often cited as an example of this, and whilst this appears to be exceptional, it was introduced on the SFRS intranet with a go-live date on the following day. Staff expressed concern about managing new information, and, in particular, operational procedures with too little time to plan and inform their staff.

It is clear from our inspection that the Response and Resilience Directorate needs to reflect on the impact of the changes it introduces on other functions within the Service.

Notwithstanding the above, it was also noted by the inspection team that the initial flow of information has begun to subside with the realisation that to accommodate operational demands, there needs to be a coordinated approach across all service functions. A draft SOP/COP implementation process is being prepared and was shared with the inspection team. This attempts to ensure that any new policy or procedure is fully circulated to all stakeholders with them being given the opportunity to respond to the draft and to highlight any requirements to complete the roll out of an Action Plan.

Operational Risk Information

The Service acknowledges that the provision of accurate and timely operational risk information to crews at an incident is an essential part of effective incident management, yet in some areas there is a lack of information available to operational crews regarding significant risks in their locality.

The SFRS has inherited eight operational information management systems all of which vary to some degree. The Service has recognised the risk associated with this and has begun a project to rationalise this key information which it sees as a priority. The Service has deployed resources to review and produce an outline plan to work towards a single system based on the existing technical infrastructure.

Included within the scope of the Service Overview was a requirement to review progress on the recommendations outlined in the report on Highlands and Islands Fire and Rescue Service in 2012⁶. An area of that report focussed on the provision of critical risk information as part of the recognised core skills required of a firefighter to effectively deliver an emergency response. During the current inspection it was noted that the information available to firefighters on the mobile data terminals had not yet reached a satisfactory standard.

Inspection team members visited Shetland, which is a remote island community with a relatively small population. There are, however, some significant risks located on the island including Sullom Voe (a major oil and gas terminal), two airports, and a number of floating barge style hotels for construction and oil workers based around the island. General risks such as a hospital, power station, care homes and hotels are also found on the island. Operational risk information currently relies significantly on the knowledge and experience of local crews and managers and is not recorded on or available to responding crews in a documented format, be that electronic or paper-based.

The lack of risk information in the former Highlands and Islands Fire and Rescue Service area is being addressed in advance of the current Response and Resilience review on operational intelligence. The installation of a wireless network to update mobile data terminals remotely, and to improve the basic mapping arrangements available to crews has been completed in advance of the roll out of the information to mobile data terminals. However, we found that the roll out of mapping and data has been prioritised on numbers of calls received by stations and not operational risk. The former Grampian Fire and Rescue Service made its data capturing processes and procedures available to Highlands and Islands Fire and Rescue Service to allow data to be recorded on a standard template, as part of the peer support provided to that service. At this time, only limited information has been uploaded to appliances in Inverness and some RDS stations categorised as having a larger number of incidents.

It is clear that this lack of operational information needs to be addressed as a matter of priority, and given the nature of the risks associated with parts of the former Highlands and Islands Fire and Rescue Service area, this should be based on operational risk. The use of a recognised template should be encouraged and sufficient resources made available, particularly in the North SDA, to ensure that this work is carried out as soon as is reasonably practicable and in tandem with the development of the technical platform.

⁶ HM Chief Inspector of Fire and Rescue Authorities, *Report on an Inspection of Highlands and Islands Fire and Rescue Service*, November 2012

3.2 The Impact of Transition on Service Delivery – Legislative Fire Safety Enforcement

Background

Fire safety duties in Part 3 of the 2005 Act apply to most non-domestic premises⁷ in Scotland, with dutyholders under an obligation to assess the risk in ‘relevant premises’ and take steps to ensure the safety of persons. The SFRS is the enforcing authority for this non-domestic fire safety regime⁸ for the majority of non-domestic premises, as the successor to the role undertaken by the predecessor services. Additionally, the SFRS became the enforcing authority in respect of civil Crown premises, a role which transferred from the Chief Inspector of Fire and Rescue Authorities. A major part of the enforcement role involves auditing premises with the greatest risk to life, to check the actions of dutyholders.

The SFRS also has a wide advisory role. A general duty to promote fire safety by virtue of section 8 of the 2005 Act applies also in respect of non-domestic premises.

Structure and Resources

Fire safety enforcement delivery is organised so that delivery is part of the function of each LSO area, with policy and support coming centrally from the Director of Prevention and Protection and a small headquarters team. This arrangement is described as matrix management.

On 1st April 2013, one of the changes introduced into the 2005 Act was the involvement of the local authority in determining the priorities and objectives of the SFRS within the LSO area. However fire safety enforcement policy is mostly determined and issued centrally by the Prevention and Protection Directorate. Our view is that centrally issued policy and target-setting is essential to the delivery of improvements in consistency.

There is in place a Business Engagement Forum which predates the SFRS. This forum has a broad membership and is a suitable arena for the business sector and the fire sector to raise issues and influence SFRS policies at a strategic level.

The proposed enforcement structure is to have a specified number of enforcement staff managed in each LSO area by a Group Manager and Station Manager, both of whom will have a wider prevention and protection role.

At the time of inspection, the LSO areas visited have, with one exception, interim arrangements with two managers in post with a designated prevention and protection role. The level of development of fire safety enforcement differed between the predecessor services, and the staffing of delivery and management of fire safety enforcement is one of the challenges facing the new service. It was commonly encountered that only one of the interim managers within each LSO area has a fire safety enforcement background. In one LSO area there is a single interim manager.

⁷ ‘Premises’ has a wide meaning in the legislation and is not restricted to buildings.

⁸ Information about non-domestic fire safety can be obtained on the Scottish Government Firelaw web pages www.scotland.gov.uk/firelaw

Generally, LSO areas do not yet have the full planned level of resources in place. Peripatetic support was in place to support some areas which have resource issues.

While the total number of enforcement staff was still to be approved, the proposal is to have 119 enforcement staff. This will be made up of 84 enforcement officers and 22 auditing officers along with some SDA and headquarters staff. By comparison, during 2011 the predecessor services had an establishment of 139 equivalent staff carrying out enforcement.

Some predecessor services used multi-role officers for fire safety enforcement. In these areas it is proposed to move away from this arrangement and for enforcement to be delivered by dedicated staff. The use of multi-role officers for enforcement can be problematic as identified in our report on Highlands and Islands Fire and Rescue Service⁹, so this would be an important positive change for some areas.

'Enforcement officers' are staff whose conditions of service are governed by the 'grey book'¹⁰ and are essentially persons who joined the fire and rescue service as firefighters, have been promoted into an enforcement officer role, and may at some point return to a firefighting role, perhaps on promotion.

On the other hand, 'auditing officers' are not firefighting staff and are on different contractual arrangements. They may be recruited directly into the post. Auditing officers carry out a narrower range of work than an enforcement officer. Unlike the enforcement officer, there is no career development opportunity for auditing officers. The number of auditing officers proposed within the SFRS is based on the number of equivalent staff in the establishment of the predecessor services. Some LSO areas will have no auditing officers. The SFRS should consider whether there is scope to convert some of the enforcement officer posts to auditing officers to achieve a consistent approach in LSO areas.

The SFRS should also consider the scope for introducing the opportunity for non-firefighters to be enforcement officers and middle managers. Removing the restriction where appointment as an enforcement officer is only open to firefighting staff would bring with it a number of benefits such as more flexibility in filling appointments, more cost effective, reduced turnover with staff remaining longer in post, reduced need for induction training, and introduction of career development opportunities for auditing officers.

The number of enforcement officers and auditing officers necessary within the Service to deliver fire safety enforcement is substantially influenced by the number of non-domestic premises to be audited within each LSO area, and the desired audit frequency which is determined by policy. By comparison the number of fire safety managers proposed at LSO level has been determined by the number of LSO areas rather than by an assessment of required managerial capacity. Some managers will have few staff to manage and there may be an over capacity of managers: the enforcement resources proposed for each LSO area ranges from three to twelve.

⁹ HM Chief Inspector of Fire and Rescue Authorities, *Report on an Inspection of Highlands and Islands Fire and Rescue Service*, November 2012

¹⁰ National Joint Council for Local Authority Fire and Rescue Services scheme of conditions of service

It is proposed to have 34 prevention and protection managers in the LSO areas (17 Group Managers and 17 Station Managers). The resource needs of the new Service during development are likely to be different from its final state needs. Once fire safety enforcement has settled down, there may be scope, in some areas, for fire safety enforcement staff to be more effectively managed across LSO boundaries, though this would need to take into account other support and delivery issues.

There is in place in each SDA a Group Manager with the function of Prevention and Protection regional coordinator. The three posts are filled by a Group Manager with some experience in fire safety enforcement. The regional coordinator role provides communication between the LSO Prevention and Protection managers, and the prevention and protection directorate and assists with consistency of delivery. There was limited evidence that the co-ordination role was being used for quality assurance testing in the wider prevention and protection role. The post holders are at an early stage of developing their own role.

Enforcement Priorities

SFRS has issued a Fire Safety Enforcement Framework document ('FSE Framework') which identifies how the fire safety enforcement role will be delivered. The FSE framework contains fire safety audit workload targets for the period covering 2013 to 2016. The audit targets in the FSE framework are:

- a.** An annual audit of hospices and hospitals with in-patient care;
- b.** An annual audit of care homes and some other registered care premises;
- c.** An annual audit of other premises which fall into the high risk category following a previous audit; and
- d.** An annual audit of HMOs (Houses in Multiple Occupation) which fall into the high risk category, otherwise audit in line with licence renewal frequency.

The audit priorities have been covered in SFRS internal training days to ensure awareness and consistency of approach.

There is also provision in the FSE framework for dealing with complaints, post-fire audits, statutory consultation, audits in response to levels of unwanted alarm signals, scope for other thematic audit work, and quarterly inspection of multi-storey flats by operational personnel.

The early issuing of audit policy and targets in the FSE Framework has allowed enforcement activity to be consistently targeted, and for enforcement staff to know priorities and have a degree of certainty in their work. While there were differences in the approach to fire safety by the predecessor services such as in the targeting of fire safety audits, there was, in principle, a broadly consistent approach to certain aspects of the process of fire safety auditing which assisted the SFRS. This included a premises risk categorisation methodology and a procedure for audit and data gathering by which levels of compliance and risk in premises was determined.

While most enforcement staff interviewed think the general targeting of premises in the FSE framework is similar to the priorities of the predecessor services (other than in the case of HMOs), this is not supported by information in the Scottish Government statistical bulletins¹¹ which show that the services were previously auditing premises across all occupancy types and devoting the majority of their audit activity to premises where the level of risk was recorded as 'average' or 'below average'.

SFRS has assessed its audit target as 9,900 audits for 2013-14 with further increase for future years. By comparison, in 2012-13 FRSs carried out 11,406 audits¹² and in 2011-12, 10,255 audits^{13,14}. However the lower SFRS target should not be seen as a reduction in delivery standard. Audit performance should not be measured merely by number of audits, but by targeting at risk and in terms of outcomes. The FSE framework offers a more targeted approach than the practice followed by the predecessor services, although this may benefit from further refinement as discussed below.

The SFRS has adopted a generic approach to its audit strategy, targeting certain occupancy types and generally other premises which fall into FSEC generic high risk bands. The SFRS approach is in line with a performance indicator in the Fire and Rescue Framework, and also takes into account the need to move to a consistent application of risk levels in premises given that there is known inaccuracy or inconsistency of information in some premises databases.

Item 1 in the appendix to this report contains an analysis and discussion on risk levels. Once systems have bedded in and risk profiling records are mature and consistently applied, the SFRS should consider whether audit targeting priorities should be modified to take account of relative risk levels.

A substantial amount of resources will be devoted to fire safety audits in Houses in Multiple Occupation (HMO). The situation with fire safety in HMOs is complex because of the interaction with licensing legislation, the different legacy approaches used in different areas of Scotland and a lack of clarity on levels of risk in HMOs. HMOs are specifically discussed in item 2 in the appendix to this report. SFRS should ensure appropriate risk categorisation for HMOs. The SFRS as the enforcing authority for the 2005 Act has primary responsibility for fire safety enforcement in HMOs and should consider auditing HMO premises and allocating resources in line with the level of risk in individual premises, rather than auditing reactively in line with licensing arrangements.

¹¹ Scottish Government, *Fire and Rescue Services Statistics, Scotland 2011-12 and 2012-13*

¹² Scottish Government, *Fire and Rescue Services Statistics, Scotland 2012-13*

¹³ Scottish Government, *Fire and Rescue Services Statistics, Scotland 2011-12*

¹⁴ While the SFRS targets and the statistical totals are not exactly comparable due to recording rules for the statistical bulletins, they do allow a broad comparison to be made.

Specialisation

Having a single fire and rescue service in Scotland allows for a strategic approach to fire safety enforcement issues and the creation of national topic specialists or specialist departments, an opportunity which was not universally available to the predecessor services. This is reflected in a number of current developments such as establishing:

- a specialist fire engineering section in the East and North SDAs along the lines of the existing section in the West SDA;
- a small team of specialists who will deal with enforcement where prosecution may follow;
- a specialist group to develop expertise in hospital fire safety to support enforcement staff in LSO areas, and delivering consistency of approach in high risk premises.

This is a positive move, though the SFRS should be mindful to avoid any duplication of effort.

Monitoring and quality control

The new Service has placed a major emphasis on targets. The FSE framework contains targets in terms of premises to be audited. A personal target of 132 audits a year has also been issued for all enforcement staff. The target takes no account of geographical issues such as travel time and could potentially be more easily achieved in urban areas where there are short journey times. While the cascading of targets to individuals is a positive step in improving accountability for performance, geographical issues should be taken into account.

There is consistent monitoring of audit activity. This is reported from each LSO area to the Directorate through the regional coordinator. There is not yet a consistent approach to the quality control of audit work. Arrangements in place ranged from scrutiny of all reports, selective checking, peer review and no checking. This is an area where policy is still under development.

Crown premises

Civil Crown premises' enforcement moved to the SFRS with effect from 1st April 2013. There are around 870 premises involved; a high proportion are offices which offer only a relatively low life risk in event of fire. The highest risk civil Crown premises are prisons which under the FSEC system, fall into the occupancy type with the highest generic risk (see table 2 in the appendix).

Prior to the transfer of enforcement responsibility, a small number of FRS enforcement officers were carrying out Crown enforcement work for the Chief Inspector of Fire and Rescue Authorities as part of a transitional arrangement. This allowed a degree of familiarisation with fire safety enforcement in prisons in Scotland to be built up, and allows an enforcement strategy to be developed from an informed viewpoint.

LSO enforcement staff interviewed broadly knew about the change but were unsure regarding any local implications. They were generally of the view that issues or inquiries in respect of Crown premises would be referred to the Prevention and Protection Directorate for action centrally. The FSE Framework document contains no specific reference to Crown premises. It would be of benefit to roll out a policy on Crown premises enforcement to staff.

3.3 The Impact of Transition on Service Delivery – Community Safety

This section of the report covers an overview of Community Fire Safety activity. As part of its core function the SFRS carries out prevention work in the drive to reduce fires, fatalities and casualties. Section 8 of the 2005 Act requires the SFRS, as it did the predecessor services, to make arrangements for the provision of fire prevention information and publicity.

Scotland historically has had a poor fire death record. There has been a welcome downward trend over the last 20 years in the number of fire fatalities and injuries in Scotland. In 2012-13, there were provisionally 46 fatal casualties in fires, making the fatal casualty rate 8.7 fatalities per million population. This is the lowest rate in the last ten years.

However, as shown in chart 2 the rate of fire fatal casualties per million population in Scotland at 8.7 was greater than England and Wales (5.1 and 5.5 respectively). Over the last ten years Scotland has continually had a higher fire fatality rate than the rest of Great Britain.

Rate of fatal fire casualties per million population – Great Britain

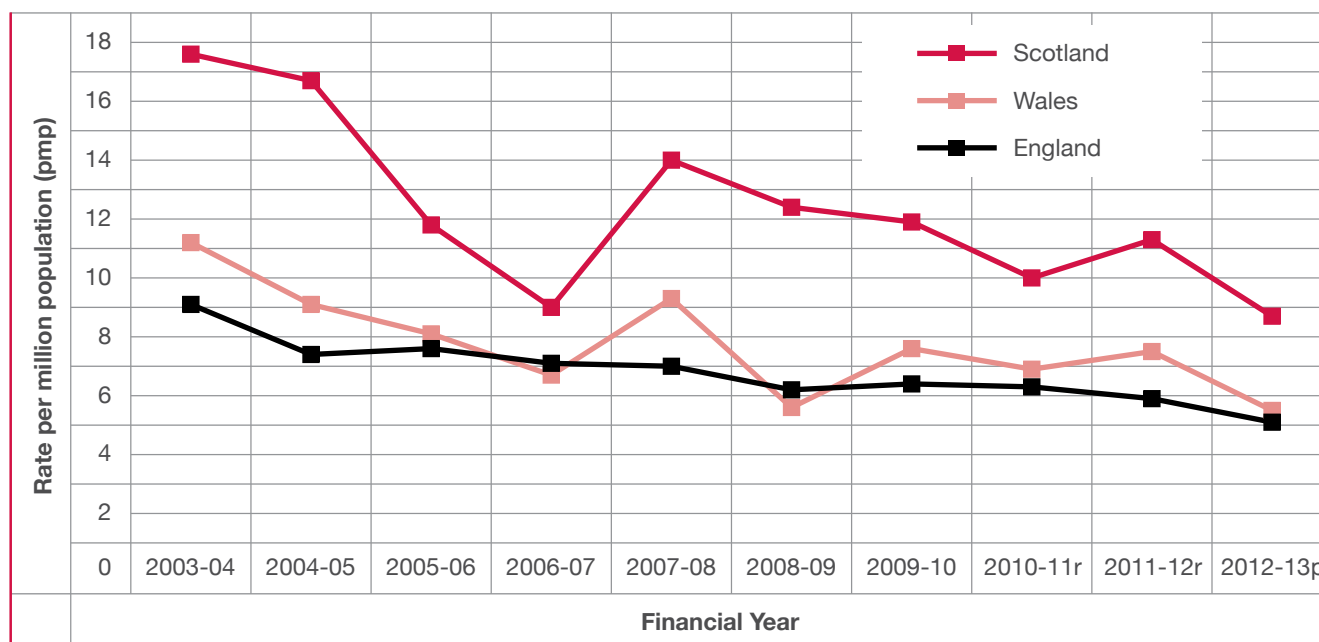


Chart 2 – rate of fatal casualties per million population – Great Britain

Notes – p: provisional, r: revised

This reduction in fatal casualties may be a consequence of the overall reduction in the number of fires, which can be attributed to a number of factors including legislative fire safety improvements, changes in smoking habits and the prevention activities of the fire and rescue service.

As the Accounts Commission highlighted in the Best Value audits report¹⁵ carried out on the eight former services, all carried out prevention activities, but to varying degrees. One of the most important features of community fire safety engagement is the delivery of a Home Fire Safety Visit (HFSV). A HFSV involves fire and rescue service personnel visiting the home of a member of the public to provide fire prevention advice and, if required, install one or more smoke alarms.

National statistical reporting of these visits has only been in place since 2012. The most recent statistics¹⁶ indicate that 56,251 visits were carried out by the eight predecessor services in 2012-13 (56,545 in 2011-2012).

Although the predecessor services all delivered HFSVs, the level of engagement differed across the country. Chart 3 illustrates the variation with, for example, Tayside carrying out a visit rate of 79.2 per 10,000 properties while the rate in Grampian was 3.5. This variation was for a number of reasons and, in itself, should not necessarily be seen as a criticism.

HFSV per 1,000 Dwellings

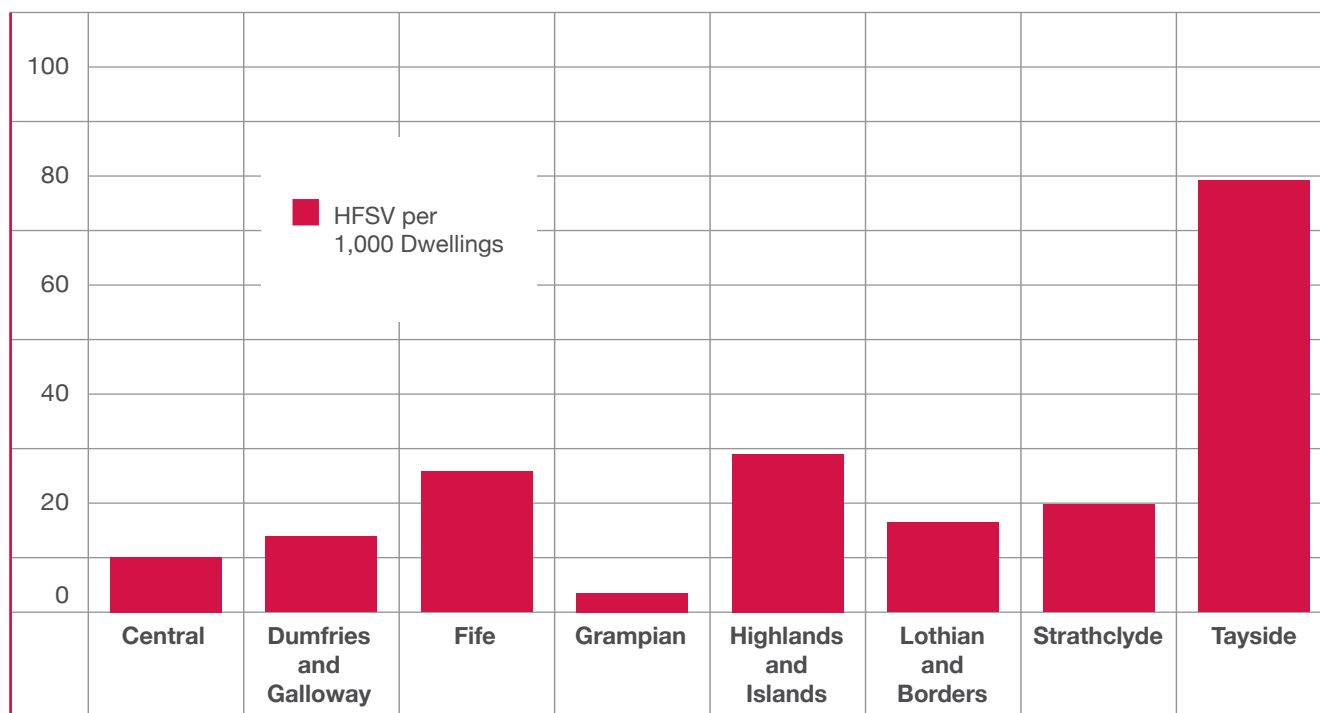


Chart 3 – rate of home fire safety visits per 1000 dwellings

Source: Fire and Rescue Service Statistics 2012-13

¹⁵ Audit Scotland, *Best Value in fire and rescue services in Scotland*, July 2012 (prepared for Accounts Commission)

¹⁶ Scottish Government, *Fire and Rescue Service Statistics 2012-13*

The creation of the SFRS has given the opportunity to implement a single policy for Community Safety Engagement (CSE) activities across the country, drawing on recognised best practice. To help achieve this, the Prevention and Protection Directorate has developed a number of policies related to community safety engagement, some as an output from the 'Scotland Together' report¹⁷. These policies are all currently in draft version. To avoid 'information overload' the Directorate has taken the decision not to publish these yet as finalised documents. During the inspection, staff in LSO areas advised us that they were working to these draft policies. The SFRS could be exposed to adverse comment if draft policies are being relied upon and the final versions should be published as soon as possible. If a policy needs to be released quickly, it could be released as a 'version 1' and given an early review date.


The Community Safety Engagement Toolkit (CSET) is an electronic recording system for generating and recording requests for Home Fire Safety Visits. Information relating to the household is captured on a risk rating form. Once the form is completed the system will allocate a perceived risk category for the occupier, allocating a high, medium or low risk categorisation. The rating is dependent on factors such as household demographics, lifestyle and existing fire safety measures within the property. The system then automatically allocates the visit request to the relevant community fire station and prioritises the visits for the station in order of risk. High risk households are contacted within 24 hours to arrange the visit.

The development of the CSET system commenced as a recommendation of the 'Scotland Together' report and was originally intended to be rolled out to the predecessor services. Although all the LSO areas visited use the system to record HFSVs, and welcomed its introduction, the system is not yet fully developed. The partnership and initiatives elements still await completion, currently scheduled to be completed by the end of this year. These two elements represent important features of effective community safety delivery and the implementation of these packages should be finalised.

National targets

The Prevention and Protection Directorate has set targets for the number of HFSVs to be conducted in each LSO area (see Appendix). There is an overall national target of 65,700 visits for 2013-14. The majority of HFSVs are delivered by frontline station based crews, with specialist community firefighters conducting the more complex 'enhanced' visits to vulnerable members of society. In all the LSO areas visited during the inspection, the targets for HFSV had been disaggregated, providing a target for either wholtime watches or Retained Duty System stations.

¹⁷ Strathclyde Fire and Rescue, *Scotland Together*, November 2009



Local managers use performance reports which display variance from target to review progress, taking action where required to improve performance. The reports also record the number of visits undertaken for each risk category. Studies have been conducted in other parts of the UK which suggest that HFSVs are of greatest value when they focus on those who are at highest risk from fire. Although the overall targets are generic and not specific to the number of high, medium or low risk visits required, the level of detail in the performance reports allows managers to monitor and ensure that the visits concentrate appropriately on areas of highest risk. During the inspection there was evidence of a focus on 'high risk' households. Identifying high risk households is achieved through a combination of referrals, local knowledge, FSEC mapping information and other targeting tools.

As well as giving SFRS strategic priorities on a number of issues, the Fire and Rescue Framework also provides SFRS national targets. These include national targets for reductions in accidental dwellings fires and fire fatalities and casualties. The targets are set against rolling three year averages and are reductions of 10% per 1,000 households for fires and 5% per million population for fatalities. These national targets have been included within some of the LSO area plans. In some LSO areas, the ability to meet a national target at a local level may be challenging. The use of locally determined targets, which contribute to the overall national target, within local plans would be more relevant and meaningful. The majority of plans seen by the inspection team pre-date the commencement of the Service. It could be expected that subsequent local plans would contain local targets.

Comprehensive Ward Analysis Reports are used to monitor and report all aspects of incidents within the local authority ward districts. These reports enable local managers to focus on areas of greatest demand and include trend analysis to aid future CSE planning and could be used to generate local targets. Further monitoring reports are available at station level which provide an analysis of station activity, broken down to watch level in some cases, that is used to provide a focus for station action plans to address specific local issues.

A National Structure for Prevention

The SFRS has developed a national structure for Prevention and Protection, defining a personnel structure for each LSO area. Dedicated prevention staff are a resource of the LSO, with support from the Prevention and Protection Directorate. The dedicated prevention staff are under the direction of the Group and Station Managers mentioned earlier and consist of Local Authority Liaison Officers (LALO), Community Firefighters, and Community Safety Advocates. Due to the transfer and matching process not yet having been implemented for some personnel grades, the planned structure has not been fully resourced. In the areas visited this delay was cited as the cause of a degree of uncertainty. Whilst all those spoken to who were directly impacted by this issue remained committed to delivering CSE, some reservations were expressed about the ability to effectively deliver CSE activities and, to a degree, the future quality of that delivery.

Although the full structure is not yet in place, there was evidence that the new Service had been able to temporarily move resources across LSO areas to fill short-term gaps. By those directly affected this was seen as a substantial benefit of the new single Service.

One key feature of the new structure will be the proposed use of Community Safety Advocates. A Community Safety Advocate, similar to the Legislative Fire Safety Auditing Officer mentioned above, is someone employed outwith the national 'grey book' fire service terms and conditions. These Advocates will be employed specifically to carry out community safety engagement work. Advocates can have a broad range of skills or can have skills specific to one particular target group, for example, ethnic minorities, young people or those with special care needs. The use of advocates is not new: however, such widespread usage is an innovation in Scotland. There are some advantages in their use but until such time as the new structure is in place, and fully operating, the impact and effectiveness of Advocates cannot be assessed. Much will depend on the skills of the individual personnel appointed. Over time, it is likely that the cost of Advocates would be less than that of Community Firefighters.

Partnership working

The 'Scotland Together' report helped to confirm the vital contribution that partnership working makes to improving the safety of communities. The Local Government in Scotland Act 2003 requires the fire and rescue service to contribute to community planning by participating in Community Planning Partnerships. The Prevention and Protection Directorate has created a staffing structure to help deliver enhanced partnership working. Specifically, each LSO area has a designated LALO at Watch Manager level. In some cases, the introduction of LALOs has enhanced the effectiveness of local partnership working. However, a lack of clarity was also described about what LALOs are expected to do as the role has not been formally defined. The LALOs are approaching their role based on their personal interpretation of what is required.

One of the benefits of working in partnership with other organisations is the generation of contacts and referrals for HFSVs for those who may be described as at high risk from fire. For the majority of areas visited, officers confirmed that CSE work was being carried out in partnership. Examples were given of working with housing associations, social services and charities. Some areas had been carrying out training of partner organisations staff to give those staff basic skills to help them identify risks within the homes of their clients and then make referrals for HFSVs to SFRS. For example, within the Dumfries and Galloway area 204 home care staff had been given training under a programme called 'Olive Branch'.

The obvious benefit in such co-operation is that it is then possible to access vulnerable people who may not ordinarily come to the attention of SFRS, such as a high risk individual living in a predominately low risk area. Engaging effectively with health professionals has been previously identified as problematic by the 'Scotland Together' and in Audit Scotland Best Value reports. There are, however, good examples of working with the NHS: for example, within the Dundee area SFRS personnel have access to an NHS Tayside secure system, *MIDAS*, which allows NHS Tayside staff to record referrals which can then be directly accessed by SFRS staff. This has the advantage of NHS staff recording referrals on their own system rather than have to access a separate SFRS system.

Focus on Community Engagement

There are many examples of good local community engagement across Scotland. Two of these are:

Oban Community Fire Station

Oban Fire Station provides a particularly good example of how local engagement and partnership working can operate.

Amongst other things, the station has been involved in:

A community safety advice distribution initiative: the local Tesco store had implemented a grocery delivery service and through negotiation with the store's management, an agreement was reached that delivery vehicles would distribute community safety literature. As a result, some 7,000 leaflets have been delivered to isolated communities since the beginning of 2013. Amongst other things, the initiative is generating requests for home fire safety visits in areas which would otherwise have been hard to reach.

A partnership with NHS Highland, which aligned the health authority's campaign on encouraging a smoke free environment for children with the fire safety strategy on reducing the risk of fire through the use of smoking materials, was delivered in the spring of 2013.

Aberdeen City Partnership Hub

Within the Aberdeen City LSO area, Aberdeen City Council launched in April 2013 a 'Partnership Hub' to help with the delivery of a range of Community Safety Initiatives. A number of Community Safety Partners, including SFRS, have personnel located in the Hub, for example Police Scotland, Aberdeen City Council Community Safety Teams, and NHS Grampian. Prevention and Protection staff advised that the co-locating of all the relevant partners makes it easier to address fire related issues, from anti-social behaviour to identifying vulnerable persons requiring fire safety advice through a HFSV. Daily tasking meetings are held which make the work very dynamic and allow for a quick response to issues.

SFRS staff also advised that the relationships built up at the Hub between co-located staff make the sharing of information regarding vulnerable people easier.

3.4 The Impact of Transition on Service Delivery – Learning and Development

This section considers the impact of reform on learning and development – with a particular emphasis on risk-critical training.

Prior to Fire Service Reform, learning and development in Scotland was coordinated in a partnership between the predecessor fire and rescue services (through the Chief Fire Officers Association) and the Scottish Government. The main coordinating body, known as the Workforce Development Group, reported into a strategic partnership body, the Ministerial Advisory Group. With reform, these bodies naturally fell away and their work was taken on by the SFRS.

The Workforce Development Group took responsibility for a large spectrum of learning and development activity across the predecessor fire and rescue services, delivered through the Scottish Fire Services College. It had a particular interest in risk-critical command and control training and was instrumental in the reinvigoration of this training across Scotland. The training was designed and delivered by Strathclyde Fire and Rescue on behalf of the College and – as with all of the training provided through the College – was directly funded as part of the Scottish Government’s central training fund. Amongst its functions, the Workforce Development Group and the College designed and arranged quality assurance through partnerships with bodies such as the Scottish Qualifications Authority and Skills for Justice.

It is crucial, therefore, that the new Service is able to pick up where the Workforce Development Group left off and ensure continuity of training design, delivery and quality assurance across the board. We have been impressed by how that work is being managed and business continuity is being maintained within the College in the short term – with a structured approach to the transfer of skills, knowledge and functions in place. Sound work has been done to bring about the seamless transition of procurement contracts for external delivery of training from the former Fire Services College to the SFRS procurement arm.

The predecessor services worked to their own annual training plans, and learning and development plans were in place for each service for the 2013-14 year, before the 1st April. For that reason and the minimal disruption noted above, reform has not had a noticeable short-term impact on business as usual for learning and development in the new Service – the existing plans are being used to deliver learning and development activities for the current financial year. We found some evidence of increased sharing of resources across the country following reform: for example, the use of driving instructors from the former Lothian and Borders Fire and Rescue Service in the West SDA, and sharing of hot fire training facilities. There is still some way to go in establishing what resources can usefully be shared and streamlining the processes for doing so, for example in cost allocation.

Of particular interest is the ongoing pressure within the former Highlands and Islands Fire and Rescue Service area. During our November 2012 inspection¹⁸, we noted that Highlands and Islands Fire and Rescue Service was being supported by trainers from other fire and rescue services, being channelled through the Peer Support Team. We pointed out that sustaining an increased level of support would be particularly challenging for the new Service. With a review of the training structure currently underway, it is not yet clear that the SFRS will be able to deliver a permanent increase in training resources. This is particularly important, as the gaps in risk-critical training which were identified in the Accounts Commission report, and further considered by the Chief Inspector in his November 2012 report, represented a very significant risk to FRS staff and to the corporate body. And the work to address those gaps as part of the 'safer firefighter' programme was, arguably, the most important element of the peer supported work which was taking place in Highlands and Islands prior to 1st April 2013.

Because of this, and related matters, it is likely that the former Highlands and Islands Fire and Rescue Service area will remain high on our assessment of risks to which the SFRS is exposed.

Focus on the Western Isles

The SFRS's presence in the Western Isles is not unique, but it provides a good example of the challenges of delivering core staff training in a remote, rural area.

The Western Isles stretch over 130 miles from the Butt of Lewis in the North, to Barra in the South. The traditional industries are crofting, fishing and Harris Tweed. However, risks include large sea-going vessels in dock, fabrication and petrochemical storage. The Scottish Fire and Rescue Service provides services for the population of around 26,500 from a network of 14 stations, using around 150 Retained Duty System and three wholetime staff.

Between the 1st April 2011 and 31st March 2012, fire engines from the Western Isles attended 510 of the 4902 incidents responded to by Highlands & Islands Fire and Rescue Service.

The remoteness means that a pragmatic balance of resources needs to be adopted to ensure a practicable level of management and operational supervision.

The routine task of sending a firefighter on a breathing apparatus course illustrates the cost and complexity involved. In order to attend a two day course, the firefighter may be required to travel by ferry and road to Stornoway, will take a flight from there to Inverness, will be given hotel accommodation there and will require road transport to the training centre at Invergordon. A two day course might involve compensation for four days loss of earnings and all of the travel and subsistence costs. The effect of a member of staff being away from home and family and, potentially, a full-time employer, is significant.

The Service has developed a business case for local training provision which, on the face of it, seems to be eminently sensible. Local delivery has been piloted by the Service.

¹⁸ HM Chief Inspector of Fire and Rescue Authorities, *Report on an Inspection of Highlands and Islands Fire and Rescue Service*, November 2012

The Scottish Government in partnership with the Chief Fire Officers' Association (Scotland) had provided two records management tools for learning and development prior to reform, LCMS (Learning Content Management System) and PDRPro (Personnel Development Records Pro). These were made available to all the predecessor services. Our interviews with users around the country made it clear that these tools were seen as highly effective and important to the continued efficient management of learning and development activities at the local level. We also collected good evidence that LCMS, in particular, is being used to drive learning and development which relates directly to local risks.

There was some suggestion that these systems had not been used consistently across the predecessor services, and we would suggest that the SFRS directs some attention to maintenance of these tools, and assurance that they are being used consistently and to best effect across the Service.

We were told that the SFRS will be auditing core skills across operational staff over the course of the year. One issue that has been brought to our attention already, and that is likely to arise during the year, is that of the way in which LSO driven training will interact with the SFRS central training team. LSOs each have a Station Manager working to monitor and direct training in their area, and it is as yet unclear how this will interface with the work being done centrally. We heard some evidence in the course of our field visits that uncertainty has crept in over how learning and development issues are to be escalated in the SFRS.

The function has been challenged by the early recognition that the theoretical model for learning and development designed in the lead-up to 1st April 2013 might not be cost effective, and did not take into account the need to rationalise duplicated management and supervision structures and training estate. Learning and Development managers have accordingly been working to re-structure national delivery arrangements to match the Service's strategic intent.

While we recognise the challenges that forward planning to take account of budget variations can present, and we saw no evidence to suggest that a leaner model will not be effective to deliver the learning and development facilities that the SFRS requires, it could be seen as unfortunate that there was not a clearer idea of what resources would be available to support the Learning and Development function in the Service to avoid the duplication of planning work arising from this situation.

The Service's senior managers are carrying out a review of training assets and there are some potential 'quick wins' for the new national Service. For example, a 'state of the art' training facility in Oban is perceived by staff as being under-utilised and could very quickly become a regional asset if appropriately qualified instructors were assigned on a part-time basis. Also, the island groups local training facilities initiative which is noted in the 'Focus on the Western Isles' case study, looks, on the face of it, to have a very strong business and financial case. Beyond that, longer term decisions on training assets are likely to be more challenging – it could be argued that with the opening of a very large facility at Clydesmill there is currently an over-provision of training facilities across Scotland. However, we recognise that any decisions to rationalise will be a matter for the Board.

We also noted pressures that are being felt in control rooms in relation to training. We discuss earlier in this report some of the effects that reform has had on control room workload, and we were advised that in some cases this had made it impossible to deliver training as scheduled to control room staff. Training for these staff is no less vital than for firefighters on station, and additionally control room staff and flexi-duty officers have had to assimilate new procedures issued by the Service.

3.5 Management and Supervision of the Scottish Fire and Rescue Service

One of the aims of our inspection was to assess *the effectiveness and capacity of the new management and supervision arrangements in relation to monitoring performance and providing quality assurance*. In reviewing those arrangements, we made a number of more general observations about the SFRS's new management structure. We discuss below some of these more general issues relating to management of the new Service.

The SFRS is a single corporate body which is governed and managed by an appointed Board and a Strategic Leadership Team working in close cooperation. In this report, we use the term *senior leadership* to describe the combination of the Board and Strategic Leadership Team.

The eight predecessor fire and rescue services each had an executive management team of principal officers, as well as stand-alone management structures for the diverse functions required to run the services. An early requirement for the SFRS was to establish a new Strategic Leadership Team responsible for the operational management of the Service. The approach taken in setting up the Strategic Leadership Team whilst leaving management structures in place below that – at least on a temporary basis – has helped the SFRS to maintain business as usual.

Relationship between the Board and Strategic Leadership Team

As the Service goes through its initial development there are three related things going on: the Board is developing as a team, the Strategic Leadership Team is developing as a team, and the two groups are developing their engagement and working relationship. The members of these two subsets of the Service's senior leadership team recognise that the Board of a national body is significantly different to the local authority bodies which preceded it and are working with that in mind.

Appropriate schemes of functional responsibility and delegation are in place in the new Service and we saw evidence of a positive and constructive approach to relationship building at senior leadership level. However, we believe that it will take some time for the various relationships to settle down and mature. Having discussed these matters with Board members and members of the Strategic Leadership Team, and thinking about the subjective nature of this sort of association, our view is that relationship building is something which will continue to need attention through the medium and long term.

We encourage the Board and Strategic Leadership Team to build a reflection of business relationships into the permanent arrangements for the Board. As a suggestion, Board standing orders might include a principle that reflection time is permanently built into the Board's and Strategic Leadership Team's programme. The senior leadership should consider whether facilitator led sessions might be useful. The publications *Role of boards: a summary for non-executive board members*¹⁹ and *On Board: a Guide for Board Members of Public Bodies in Scotland*²⁰ provide useful advice.

Change management process

The Board has stated that its short-term focus is on supporting the settling in of a new management structure and ensuring business as usual and this is, of course, entirely appropriate. However, the Board also recognises its role in driving through change and innovation in the Service. Our understanding is that change is intended to be managed through a Service Transformation Board, chaired by the Deputy Chief Officer, which in turn reports to a sub-committee of the Board. It is not yet clear how effectively that change management process is being coordinated through this arrangement but we believe that it is crucially important to the Service that this structure is appropriately resourced and used.

This programme management arrangement is also viewed as very important by staff representative bodies. The SFRS and Scottish Ministers have been commended²¹ for the way in which service transformation is being led in partnership with staff representative bodies. However, we think that in the longer term there is an opportunity to further develop this work. We would encourage the Board's Service Transformation Committee and the Service Transformation Board to further reflect on how they might use their processes to support partnership working.

Planning of new organisational structures

A priority for the SFRS was to establish new organisational structures to replace those of the eight predecessor services. In doing so, the Service had to take account of the expectation that savings could be achieved through eliminating duplication of roles from the predecessor services, and rationalising the number of locations from which back office functions would be delivered in future. A particular challenge was to reconcile the expressed aim of fire reform to strengthen local engagement, with the requirements of a national service to provide consistency of direction across the country.

It is apparent that the complexity of the exercise, combined with budgetary pressures, has not made it easy for the SFRS to finalise its new structures and this work is ongoing. As noted above in the context of learning and development, this is not to say that the effectiveness of the final structures will be compromised by budgetary revisions: rather that this has led to avoidable duplication of planning work. We were advised that the rationalisation of flexi-duty officers should be complete by January 2014, and job matching for support/administrative staff should be complete by December of this year. The implication is that the necessary organisational structures are now all but finalised, but a more joined-up approach to people and financial planning would be beneficial in future.

¹⁹ Audit Scotland, September 2010

²⁰ Scottish Executive, April 2006

²¹ Scottish Government, *Fire and Rescue Reform Programme Gateway Review 0*, 4 February 2013

Managerial structures relating to Specialist Rescue

We noted that national coordination and development for specialist rescue, much of which was delivered under the auspices of the Chief Fire Officers' Association (Scotland) which had been in place under the predecessor services, are no longer in operation. It is important that new managerial structures that are appropriate for the national service are implemented and that these include a strategic forum for specialist rescue as a whole. The Service may wish to consider how any potential gap in the management of specialist rescue could be filled until new national managerial structures are in place.

Communication with staff

During the course of our field visits we encountered significant comment to the effect that middle management, while it was fundamental to the successful delivery of reform and crucial to maintaining the momentum of reform at a local level, had felt that the restructuring process had been confusing and had led to uncertainty among middle managers about their future. In some cases, this had led to disengagement and a level of dissatisfaction with the Service. More than one respondent advised us of their fears that competent managers would end up disengaged and leave the Service when these people were in fact critical to the Service's future and represented its next generation of leaders.

We are aware of a number of initiatives put in place by the SFRS to promote communication to staff, including an Employee Partnership Forum, a regular video blog from the Chief Officer, and staff meetings and engagement events within Directorate teams. While we do not think that the Service has overlooked the importance of staff communication, with the benefit of hindsight, some additional communication in relation to middle management restructuring may have been beneficial. The uncertainty affecting middle management might have been reduced if a national organisational structure had been published at an early date along with a clear statement of when existing staff would either be matched to a post in that structure, or identified as supernumerary.

By the time this report is published these observations may have been overtaken by events, and we expect that much of this planning would be complete. We would invite the SFRS to take note of these observations should it be in a position of having to rationalise staff positions at any time in the future, and to follow a process of establishing, at an early time, what form the new structure will take, and then publicising a timeframe in which staff will be mapped to the new structure. Any future rationalisation of control rooms, for example, would benefit from this process.

The Communications and Engagement Loop

The SFRS's understanding of the need to establish communications structures is demonstrated by its development of a Communications and Engagement Loop for communications with key stakeholders. Implementation of the loop is in its infancy, with some meetings yet to take place; however, it provides a good framework for engagement. A visual representation of the Communications and Engagement Loop is provided overleaf.

Communication and Engagement Loop

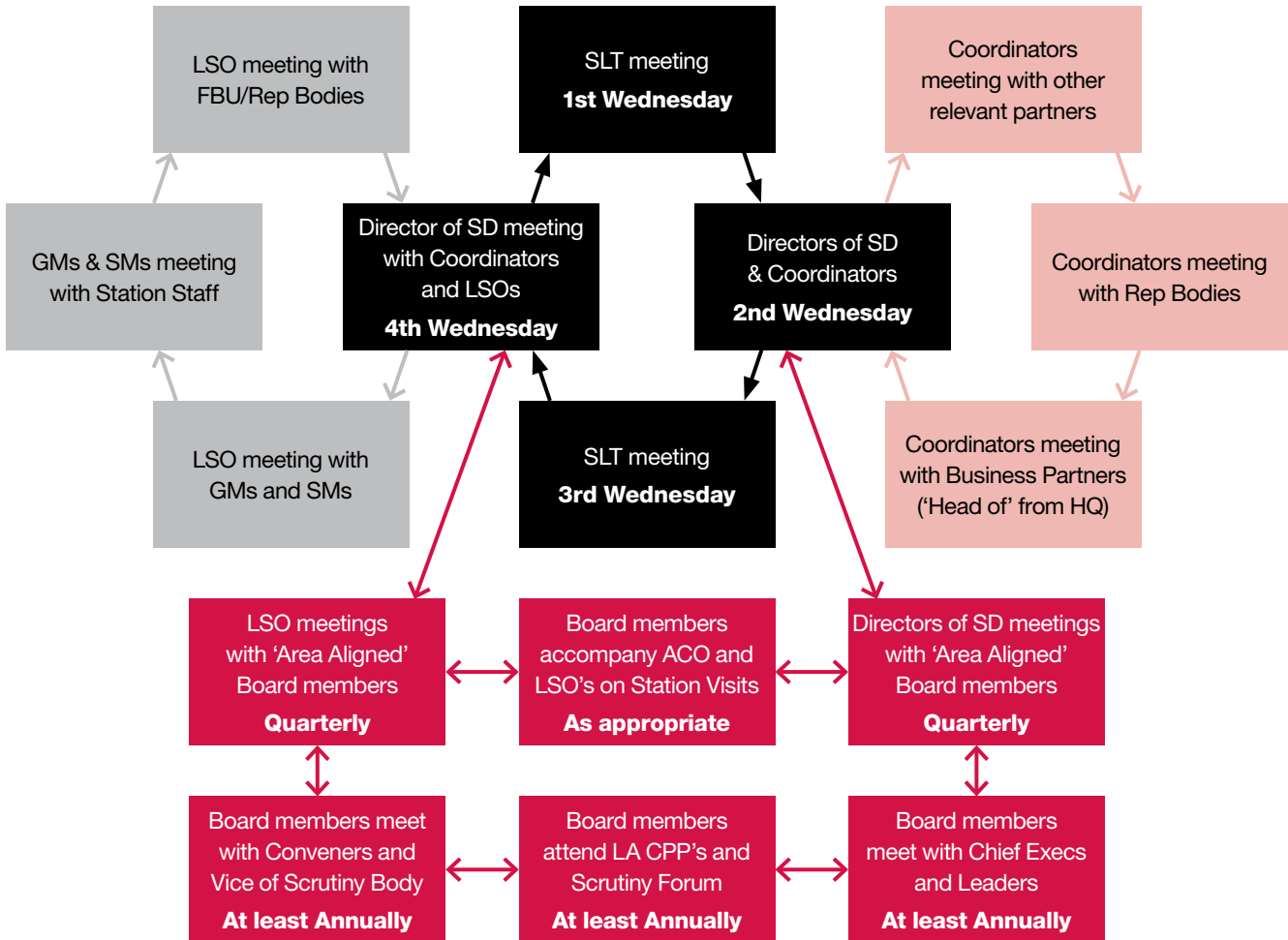


Figure 2 – the SFRS Communication and Engagement Loop

Coordinators

We have discussed above the Coordinator role that has been established as a way of bridging the potential gap between local practice and national direction. Feedback provided to us during the course of our field visits suggested that the Coordinator role was not well-defined, and Coordinators had to reconcile their role of providing national direction with the fact they were not in a line management relationship with LSOs. Nor was it apparent to all of our interviewees whether the Coordinator role was a temporary expedient, or a permanent part of the SFRS management structure going forward. This is a further illustration of the desirability of publishing final organisational structures for the management of the SFRS, and providing clarity around reporting lines for managers.

We suggest that the SFRS should revisit this issue and either satisfy itself that its final management structures are in place and published in a form easily accessible to staff, along with an explanation of reporting lines and avenues for escalation of issues where these are not clear: or, if this has not yet been done, that this work be finalised. It may also be helpful if some clarification can be provided to the Service generally about the nature of the Coordinator role, and expectations of how differences between Coordinators and officers in the SDAs can be resolved, should they arise.

The North SDA provides a good example of how the Area Coordinator's role aligns with the overall communications within the SDA. Regular meetings with key departmental leads provide the Coordinator with an overview of objectives within the SDA and allows the Coordinator to inform the Director of progress. The Coordinators across the Service meet regularly with the SDA Directors to ensure consistency across each of the SDAs.



Figure 3 – North SDA – Coordinators Meeting

Performance management and self-assessment

A key responsibility of the leadership team in the new Service is performance management. Each of the eight predecessor services had its own performance management framework, albeit many of the statistical indicators involved were reported on at a national level. However divergences in approach can clearly be seen when it comes to indicators such as numbers of home fire safety visits carried out. One of the major challenges for the SFRS is to establish a national performance management framework and achieve consistent reporting against it.

Our assessment is that, at this early stage, this work is still in development. The Service is alive to the issues posed by performance management requirements, but recognises that there is some way to go before a consistency of approach is achieved. Where we were provided with information about performance management issues, this was often on the basis that new approaches were being trialled and developed. For example, in the West SDA, attention was being paid to individual performance management arrangements with efforts being focussed on cultural change in relation to personal performance management.

Importantly, self-assessment tools for the SFRS are being developed and trialled in the West SDA with the assistance of partner agencies. It is fundamental to the way in which the SFRS and HMFSI interact that HMFSI is not primarily responsible for performance monitoring and assessment of the SFRS – this is a function that the Service itself is responsible for carrying out. We are encouraged that the SFRS has recognised the importance of self-assessment of its performance and we look forward to continuing to work with the Service to provide assurance that those tools are fit for purpose and working well.

A national performance management team has been set up working out of SFRS headquarters in Perth, and the intent is that over time, this team will be responsible for collecting information from across the Service that will enable judgements to be made about operational effectiveness and lead to improvements in service delivery. It is reassuring that the importance of this work has been recognised and we expect that this will continue to be a priority for the SFRS – although we note later in this report one area in which a clearer roadmap to meeting the Scottish Government's performance expectations of the SFRS would be helpful.

3.6 The Service's Plans to Deliver the Benefits of Reform

In this section, we comment on the extent to which, and with what degree of clarity, the Service has set out its plans to deliver the agreed benefits of reform.

Strategic planning and programme management

Reform of the fire and rescue service in Scotland is a major business change.

The Service is adopting a structured approach to business planning. Drawing on the Fire and Rescue Framework for Scotland, and in order to meet its statutory duty, the Service has prepared a 3 year Strategic Plan and, below that, an Annual Operating Plan. The Annual Operating Plan restates the set of primary and secondary performance indicators published in the Fire and Rescue Framework.

Alongside that, the Service's Transformation Programme Board maintains a Service Transformation Plan and, in turn, each Directorate is managing a suite of projects, designed to enable the change required to meet the Service's strategic aims and defined benefits of reform.

A Programme Manager, on secondment from the Scottish Government, worked for a period on building a programme management framework based on a top-down and bottom-up approach. That is to say that the sets of Directorate projects and outputs are being aligned to the Service's strategic aims and ultimately to the benefits of reform. The Programme Board is effectively sponsored by the Service Transformation Committee – a sub-committee of the SFRS Board. We are advised that the current Programme Manager post will be supported by a small Programme office – however, none of these arrangements have been firmed up at the time of writing.

Alongside this work, a new blueprint for service transformation is being developed, again through the top-down and bottom-up integration of transformation projects. The Strategic Leadership Team is well engaged in this development work.

Consultation on the strategic plan is well advanced, with a few councils still to respond. Responses from partner organisations are suggesting that the plan is very clear, confirming that objectives are in alignment with local authority, Community Planning Partnership and Strategic Coordinating Group aims and objectives. Respondents all state they are looking forward to the implementation details which will follow in local plans.

We strongly support a structured approach to programme management, the introduction of which was a key recommendation of a Gateway Review of reform²². Amongst a range of benefits (and assuming the process is implemented well), programme management provides two key things: (1) structure and integration of the many projects running or planned across the SFRS, and (2) the ability for the Service to *demonstrate* effective and efficient change management.

²² Scottish Government, *Fire and Rescue Reform Programme Gateway Review 0*, 4 February 2013

The preparation of a relatively complex set of plans has, in itself, been a challenge to the new Service which, because specialist staff whose roles were duplicated across the predecessor services have now had their numbers rationalised, has less capacity to draw on than its predecessor organisations. Also, the plans have of necessity been prepared out of sequence, so that they do not flow smoothly and they contain duplicate content. With that in mind, and reflecting on our observations above, we make the following comments:


- The second generation of plans would most certainly benefit from a removal of duplication and the reduced amount of content this would produce. We would encourage the production of clear and concise 2nd generation plans with focussed and measurable objectives.
- A large proportion of the Directorates' objectives set out in the Annual Operating Plan understandably relate to the process of integration. As a result, they say nothing about the process of change beyond that point. Our overall assessment is that a broad direction of travel has been set out – principally related to the recognised agenda of combining nine predecessor organisations into one and meeting the three defined benefits of reform. Beyond that, however, we cannot say that there is particular clarity on the practical effects of reform or evidence of ambition at this stage.
- To ensure the co-ordinated organisation, direction and implementation of the service transformation programme, it is crucial that the work which is currently ongoing to pull together a large range of Directorate projects is completed, and the transformation work is overseen and coordinated by the Programme Board and Service Transformation Committee. We would encourage the ongoing development of a programme management function and its integration into the Service.

Thinking about equality and diversity within the reform process

The Board has made its strategic intent on equality and diversity matters clear and, amongst other things, has approved an equality and diversity mainstreaming policy. The nature of the SFRS's business means that equality and diversity underpins everything the Service operates internally and provides its services to the public. For a public service which is held in high regard, strong moral obligations and the ability to lead by example sit alongside, and complement, legal duties.

The reform process is, in many ways, providing opportunities to re-design and re-engineer the Service. Further and worthy ambitions relate to the development of organisational culture. There is therefore a clear and unique opportunity to build in and reinforce the principles of equality and diversity.

We have noted that policy papers are being submitted to the Board which have not yet been Equality Impact Assessed. We recognise that the new Strategic Leadership Team has been under a great deal of pressure to develop submissions within tight timescales. However, we would strongly encourage the Board to accept such submissions only in exceptional circumstances. Amongst other things, this will help the Board to promote the mainstreaming of these matters.



The Inspectorate's general intention is that equality and diversity matters within the SFRS will not be examined as a 'stand-alone' topic but will form a thread through all of the inquiries and reports we undertake.

Planning to meet Framework targets

In the Fire and Rescue Framework, the Scottish Government has set targets for the SFRS. These targets are distinct from the Aims of Reform articulated in the Framework: the Aims are broadly qualitative whereas the targets are specific and quantitative. Many of the documents we have seen explain how the SFRS intends to deliver the Aims of Reform, often in detail as in the Draft Annual Operating Plan for 2013-14. What is not always apparent is how the SFRS intends to deliver the targets set out in the Framework.

An example is the target of reducing fire casualties (excluding precautionary check-ups) by 5% each year. In the Draft Annual Operating Plan, SFRS discusses how it will deliver the aim of protecting and improving local services. In its draft Strategic Plan 2013-16, the SFRS specifically notes this (and other) targets that the Service has been set, and discusses some of the ways in which these targets may be realised.

In our view, however, there is still a lack of clarity about how planned changes will make a difference. For instance, does the SFRS feel confident that it knows why the rate of fire casualties is what it is, and what the levers are for reducing that rate? What is the Service's opinion about the interaction of prevention and response in reducing fire casualties? Where will it focus its efforts and limited budget? And importantly, does the SFRS agree that it is within its power to deliver these targets – or are there other factors at play?

We understand that not all the answers to these questions are clear cut. We appreciate also the difficulties inherent in predicting the outcome of intended activities. We note, though, that the targets set are annual ones. In our opinion this implies that the SFRS should be able to articulate specifically what it is going to do in 2013-14, and subsequent years, which it considers will reduce fire casualties; whether it expects to meet the target of a 5% reduction, and what its contingency plans are if the hoped-for outcomes are not achieved. These specific targets and service objectives will form the basis of any performance based systems developed by the Service for teams and individuals.

Review of a number of the Local Fire and Rescue Plans that we have seen shows that at local level, importance has been attached to setting out the framework targets, and identifying the interventions that are intended to address them. In many cases a more specific relationship is set out between a target and the relevant interventions.

Local plans are not, however, sufficient to fulfil the requirement for the SFRS to plan on a national scale. It may be unrealistic for a local area to plan to reduce casualties by 5%, particularly where its base level of casualties is very low to start with. It is a more pertinent question to ask how, across Scotland, casualties will be reduced by 5%, and this may involve different actions in different local areas.

It is also important that plans discuss how proposed actions will produce the desired effect. For example, if targeting vulnerable individuals with Home Fire Safety Visits is identified as a proposed intervention, is this based on evidence that this intervention has been successful in the past? Simply saying that a particular activity will be undertaken with a view to achieving a target may not be very helpful if there is no explanation of why the activity will help to achieve the target. This is particularly the case where the link between Fire Service intervention and outcomes is weak or uncertain, for example in relation to the target of reducing casualties from non-fire incidents.

It would be telling if one local service delivery area had a particularly effective intervention that was proven to produce lower rates of fire casualties, in a similar socio-economic area, than were found elsewhere in the country, and we would anticipate that identification of good practice in this way would be a key benefit of Fire Reform. We are not yet confident that the SFRS is able to do this for all the targets in the Framework.

Local engagement

Strengthening engagement, and working in partnership with local government is a key part of the Fire and Rescue Framework, and indeed ‘working in partnership with communities’ is enshrined in the Scottish Government’s description of the purpose of the SFRS. This is a principle which the new Service has taken seriously. The structure of the Service has been designed to facilitate local engagement and accountability, with 17 LSOs having been appointed with the express aim of engaging with local government in their areas. The aim is to allow a two-way dialogue between SFRS and partner organisations to influence the development of SFRS local service delivery plans as well as partner organisations’ service delivery.

Local scrutiny and engagement structures were the subject of a report²³ by HM Inspectorate of Constabulary for Scotland (HMICS), supported by HMFSI, in May 2013. In that report the importance of these structures, and the desirability of monitoring their ongoing effectiveness, was noted.

We have seen examples of the local plans that are being prepared by all LSOs for their local government areas, and the evidence suggests that engagement with local government has been good and that the partnership working foreseen in the Scottish Government’s plans for the Service is being realised. This is also being demonstrated in the community safety field, with strong examples of partnership working between the SFRS and other agencies, for example in identifying vulnerable people who might benefit from a Home Fire Safety Visit.

Accordingly our assessment is that from the perspective of the SFRS, the planning and structures that have been put in place should appropriately address this core principle underlying the Service’s operations. The way in which these structures operate in practice may be something that we, along with HMICS, wish to revisit in the future.

²³ HMICS, *A thematic inspection of the development of local police plans and local fire and rescue plans and associated arrangements for local scrutiny and engagement*, 23 May 2013

There is one issue that was raised with us in the course of our interviews with SFRS staff that we would note at this stage. We were advised that the Service Delivery Director – East wrote to some 360 elected representatives after SFRS came into being, introducing himself and offering meetings. Only five responses were received. Whilst other evidence suggests that there is no lack of engagement with local authorities, the involvement of elected representatives is a valuable way in which the principle of local engagement can be reinforced. We would hope that as the profile of SFRS increases over time, elected representatives will see it as in the interest of their constituents to engage directly with SFRS officers where the opportunity presents itself.

Specialist Rescue

HM Chief Inspector of Fire and Rescue Authorities' report on the 2008 Galston Mine Incident²⁴, published in 2012, recommended that,

“...the Scottish Fire and Rescue Service acts as a champion and coordinator of specialist rescue.”

This was adopted within the Fire and Rescue Framework for Scotland 2013 which states:

“Whilst acknowledging the UK Search & Rescue Framework, which sets out the co-ordinating arrangements for Search & Rescue incidents in the United Kingdom, the SFRS should actively develop a leading role as a champion of specialist rescue. The SFRS should pro-actively engage with the other emergency services and relevant voluntary groups to understand and manage the risk across Scotland, and, in doing so, create more equal access to specialist rescue capability, whether provided either directly by SFRS or utilising other existing specialist support based on community risk.”

Since the introduction of key specialist rescue capabilities, the Service has developed substantial expertise in roles such as urban search and rescue, dealing with chemical and other hazardous materials incidents, mass decontamination, flooding, technical rope and swift water rescue. The equipment and training facilities available to the Service have also been developed in response to the increasing demand on the fire service to respond to diverse rescue situations. The facilities available to the SFRS with regard to specialist rescue are well established and, to the best of our knowledge, fit for purpose. They provide first class training facilities for multi-agency training and exercising and an excellent opportunity to promote and engage with other emergency rescue providers.

The Response and Resilience Directorate is currently evaluating the provision of specialist rescue capability across Scotland with a view to providing the Strategic Leadership Team and the Board with a Fire and Rescue Cover Review. This information will go some way to rationalising the current rescue capability within Scotland and allow the redeployment of resources, based on risk rather than on a combination of risk and previous organisational boundaries. At present, resource information is largely confined to the SDAs, due mainly to technical constraints with the existing mobilising systems, with national systems yet to be fully deployed. The East SDA provided an example of awareness of this issue in a General Information Note to that effect.²⁵

²⁴ HM Chief Inspector of Fire and Rescue Authorities, *A Report to Scottish Ministers – The 2008 Galston Mine Incident*, March 2012
²⁵ SFRS, *General Information Note – E22/13 – Special Appliances and Capabilities*, 2013

Although there are some future plans to rationalise specialist rescue in the Service, the champion and coordinator role is yet to be defined or developed. We suggest that this role should build on the existing working relationships between Fire, Police and Ambulance and be expanded to other specialist providers, such as voluntary groups, Local Authorities, Regional Resilience Partnerships and Emergency Planners. The Service should consider establishing a centre for excellence for specialist rescue, including co-location and a close working relationship between staff, coordination of supervisory and strategic management and shared policy development.

The SFRS has improved and developed the Scottish Coordination Centre Database (SCCD) following the introduction of a Control Operating Procedure. The SCCD is a central database that stores all the nationally available Resilience equipment in Scotland. The SCCD provides a means to access and maintain information on resource availability and operational readiness. This will ensure the better management of resources and their availability across the country.

It is important that the Service recognises its limitations regarding its rescue capability and builds partnerships with other blue and non-blue light organisations to further enhance the protection afforded to Scotland's communities. Staff interviewed found it difficult at a local level to arrange training and would welcome a more strategic approach to improving these relationships. It has to be recognised, however, that a lot of these agencies are volunteer and regular training opportunities can be difficult to arrange. Relationships have been built within some sectors with varying degrees of success. For example, work with the Coastguard in many parts of the country is well established: however, in some areas, where there is no rope rescue capability, liaison with the Coastguard who provide this function has been difficult to establish. Similarly, training and exercising with Mountain Rescue Teams is sporadic, and generally difficult to organise at a local level.

We found that some work has been undertaken around a database which would provide information regarding relevant available resources and their contact information. ICT resource limitations were cited as the reason this work has not been progressed.

Integration of critical communication systems

The predecessor fire and rescue service control room systems enabled the movement and tracking of appliances and officers within their service areas and included the capability to operate 'cross-border' where required. With the introduction of the single Service, a more flexible approach is required, both technically and procedurally to allow these resources to operate over a wider geographical area and interface with a number of control rooms.

Work has begun within the Service to identify and implement short-term changes to meet the emerging needs of the Service. However, key success factors and medium to long-term planning has yet to be formalised. This work is required in order that the Service may realise the benefits of reform through a more efficient, effective and sustainable delivery model, irrespective of the Service's plans to rationalise control rooms.



There are well-known challenges involved in the integration of disparate ICT networks and systems, and the discussions we had with relevant SFRS managers indicated that these challenges are understood within the Service. It is important that SFRS is mindful of the conclusions of the Audit Scotland report *Managing ICT Contracts: an audit of three public sector programmes*²⁶ when planning and implementing the integration of the predecessor services' ICT systems: for example that clear objectives have been set for the project/s and that they are aligned to overall strategic objectives of the Service.

²⁶ Audit Scotland, August 2012

4 Next steps in reform – issues for the SFRS to consider

One of the intentions of this report is to allow the Chief Inspector to identify emerging issues and make comment on them.

We have avoided making any formal recommendations as such. As we have stated at a number of places in this report, we understand that this is a time of transition for the SFRS, and it would be artificial to put forward recommendations that might be appropriate for a service that was in a steady state, when in reality the journey of Fire Reform in Scotland is still a work in progress.

In places, perhaps unusually for an Inquiry report, we have made statements of opinion and impression as opposed to specific findings. This is a deliberate reaction to the circumstances firstly, that as an overview inspection, it would have been very difficult to follow up in detail every issue that arose; and secondly, that an issue that had prominence at a given time and location may rapidly diminish in importance as reform continues.

The 2005 Act requires that the SFRS must have regard to this report and, having done so, must take such measures (if any) as it thinks fit in relation to the report. We are therefore confident that where we have expressed a view on particular issues, SFRS will consider what we have said and will take it into account in its forward planning. In order to assist with this, we have gathered together below a list of issues raised in this report that we consider the SFRS may wish to focus on.

Issues – the impact of transition on service delivery

Operations

- a) Particular attention will have to be paid to staff retention and engagement to avoid any degradation of service delivery pending the finalisation of control structures and staffing.
- b) Control rooms now share information on SFRS special resources and their locations: however at this time, the work is in its infancy. To ensure specialist resources are utilised, they should be configured within the command and control systems and control staff need to understand when a specific resource should be included within a response.
- c) It is important that the SFRS fully assesses the impact of any plans to change the current arrangements for control rooms to ensure effective project management.
- d) Business continuity in the former Highlands and Islands Fire and Rescue Service area is not yet assured. We have identified a number of issues that require ongoing monitoring to ensure that the remedial activities in place before SFRS was established do not suffer loss of momentum.
- e) Operational Risk Information available to firefighters has not yet reached a satisfactory standard across the Service. Provision of operational risk information needs to be addressed. The use of a recognised template should be encouraged and sufficient resources made available, particularly in the North SDA, to ensure that this work is carried out.

Legislative Fire Safety Enforcement

- f)** SFRS should consider whether there is scope to convert some enforcement officer posts to auditing officers to achieve a consistent approach in LSO areas, and should also consider the scope for introducing non-firefighters as enforcement officers and middle managers.
- g)** SFRS as the enforcing authority for the 2005 Act has primary responsibility for fire safety enforcement in HMOs and should consider auditing HMO premises and allocating resources, in line with the level of risk in individual premises.
- h)** Item 1 in the appendix to this report contains an analysis and discussion on risk levels. Once systems have bedded in and risk profiling records are mature and consistently applied, SFRS may wish to consider whether audit targeting priorities should be modified to take account of relative risk levels.
- i)** The FSE framework document contains no reference to Crown premises. A policy on Crown premises enforcement would be of benefit.

Community Safety

- j)** Studies elsewhere in the UK suggest that Home Fire Safety Visits are of greatest value when delivered to those at highest risk. Performance of visits undertaken in LSO areas is reported by occupant risk category. Appropriate monitoring of performance should continue to ensure that priority is given to identifying and engaging with households categorised as high risk.
- k)** The partnership and initiatives elements of CSET still await completion, which are currently scheduled to be completed by the end of this year. These two elements represent important features of effective community safety delivery and the implementation of these packages should be finalised.
- l)** In some LSO areas, depending on the LSO area concerned, the ability to meet a national target at a local level may be quite challenging. The use of more localised targets, which contribute to the overall national target, within local plans would be more relevant and meaningful. In time it could be expected that subsequent local plans would contain local targets.
- m)** SFRS could be exposed to adverse comment if policies still marked 'draft' are being used. If a policy needs to be released quickly, it would be better released as a 'version 1' and given an early review date.

Learning and Development


- n)** There was some indication that LCMS and PDRPro had not been used consistently across the Service in the past and we would suggest that the SFRS directs attention to maintenance of these tools, and assurance that they are being used consistently and to best effect.
- o)** The Service needs to monitor learning and development provision to control staff to ensure that they have equitable access to training.

Issues – management and supervision of SFRS

- p)** The Service may wish to consider how any potential gap in the management of specialist rescue could be filled until new national managerial structures are in place.
- q)** The SFRS should ensure that its management structures are published in a form easily accessible to staff, along with an explanation of reporting lines and avenues for escalation of issues where these are not clear. If any of these management structures remain to be finalised this should be completed.
- r)** It is important that the capacity of middle management to deliver operational command as well as the other management functions required by the Service are factored into any further revision of the middle management layer.

Issues – the extent to which SFRS has set out its plans to deliver the benefits of reform

- s)** Strategic planning could be improved through more detailed analysis of the measures that will be applied to meet the targets in the Fire and Rescue Framework.
- t)** We have noted that policy papers are being submitted to the Board which have not yet been Equality Impact Assessed. We would encourage the Board to accept such submissions only in exceptional circumstances.
- u)** We would encourage the Board and Strategic Leadership Team to build a reflection on business relationships into the permanent arrangements for the Board.
- v)** We would encourage the Board's Service Transformation Committee and the Service Transformation Board to further reflect on how they might use their processes to support partnership working.
- w)** It is crucial that the work which is currently ongoing to pull together a large range of Directorate projects is completed and the transformation work is overseen and coordinated by the Programme Board and Service Transformation Committee. We would encourage the ongoing development of a programme management function and its integration into the Service.
- x)** The second generation of strategic plans should be clear and concise with focussed and measurable objectives.
- y)** The SFRS should address its role as a champion of specialist rescue by:
 - considering the establishment of a centre for excellence for specialist rescue,
 - building partnerships with other blue and non-blue light organisations to further enhance the protection afforded to Scotland's communities,
 - nationally managing and coordinating information regarding non-fire service rescue resources, for example, Mountain Rescue Teams, voluntary organisations, Maritime Coastguard Agency etc.

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- z)** A more flexible approach is required, both technically and procedurally, to allow the tracking of appliances and officer resources over a wide geographical area and ensure an interface with a number of control rooms. Key success factors and medium to long-term planning have yet to be formalised. Through this work, the Service may realise the benefits of reform through a more efficient, effective and sustainable delivery model, irrespective of the Service's plans to rationalise control rooms.
 - aa)** SFRRS should be mindful of the conclusions of the Audit Scotland report *Managing ICT Contracts: an audit of three public sector programmes* when planning and implementing the integration of the predecessor services' ICT systems.

Glossary and abbreviations

Throughout this report, at the risk of some repetition, we have minimised the use of abbreviations in the interests of readability. There are some exceptions, particularly where an abbreviation is used so widely within or outside the Scottish Fire and Rescue Service that spelling it out on each occasion would look unnatural. Examples are ‘SFRS’ for Scottish Fire and Rescue Service and ‘LSO’ for Local Senior Officer. An explanation of abbreviations used can be found in the table below.

COP	Control Operating Procedure
Fire and Rescue Framework	The Fire and Rescue Framework for Scotland 2013 sets out Scottish Ministers’ expectations of the SFRS. The Framework reaffirms the Aims of Fire Reform, sets strategic priorities and objectives for SFRS, and also sets quantitative targets, based on statistical performance indicators, for SFRS to aim towards.
Flexi-duty officer	A uniformed fire and rescue officer at Area, Group or Station Manager level who is contracted to work a shift system which, in addition to working managerial duty hours, also requires them to be on-call to respond to emergency incidents as a supervisory officer or member of an incident command team.
FSEC	Fire Service Emergency Cover Model – an evidence based tool for assessing risk and assisting with the allocation of resources.
HFSV	Home Fire Safety Visit – A visit to a member of the public in their own home by SFRS personnel to provide fire safety advice and, where necessary, install one or more smoke alarms.
HMICS	HM Inspectorate of Constabulary for Scotland
HMO	House in Multiple Occupation
LALO	Local Authority Liaison Officer
LSO	Local Senior Officer
Matrix Management	An organisational structure in which an individual may report to more than one manager, usually depending on which of a number of different organisational functions the reporting relates to. Contrasts with direct line management in which every individual in an organisation has one identified person they report to.
Predecessor organisations	The eight fire and rescue services in Scotland, and the Scottish Fire Services College, that were combined into SFRS.
SDA	Service Delivery Area. SFRS is organised into three geographical areas for service delivery.
Senior leadership	The term we have used to describe the Board and Strategic Leadership Team acting together to provide governance and management of the Scottish Fire and Rescue Service.
SFRS	Scottish Fire and Rescue Service
SLT	Strategic Leadership Team. The most senior operational leadership group within SFRS.
SOP	Standard Operating Procedure
2005 Act	The Fire (Scotland) Act 2005

How we inspected the service

The Inspection took place in July and August 2013.

The Inspection team members were:

Steven Torrie QFSM
Alasdair Perry
Tracey McKenzie
Brian McKenzie
Mark McCabe
Graeme Fraser
Paul Considine
Bob Arnott

A Quality Assurance Panel helped us by challenging a draft of the report. The team was:

Peter Holland CBE, Chief Fire and Rescue Adviser for England;
Lee Howell, Fire and Rescue Adviser to the Welsh Government;
Christina Yule, Lead Inspector, HMIC Scotland.

We began this inspection process by interviewing a number of the Service's Board members, Directors and senior managers.

The most substantial part of our work involved the inspection teams visiting a number of fire stations and offices across Scotland. We chose the sites to visit by considering a number of criteria:

- A good geographical spread. A visit to each of the predecessor FRS areas and, if possible, a visit to each of the 17 LSO areas
- A good variation in risk profile e.g. urban areas and remote rural
- Our existing knowledge of the Service (e.g. derived from HM Chief Inspector of Fire and Rescue Authorities and the Accounts Commission reports into Highlands and Islands FRS)
- Sites particularly pertinent to the function or functions we were looking at.

Prevention and Protection manager/s were interviewed in eight LSO areas, and selected Community Safety and Fire Safety Enforcement staff in those areas were either interviewed or took part in a group discussion. We looked at structures, workload, resources and communications but did not undertake any examination of the quality of work carried out by enforcement staff.

We conducted a number of group interviews with station based personnel. We also wrote to staff representative bodies and spoke to those who wished to meet with us.

We are grateful to the Board, Strategic Leadership Team and the many members of staff who helped us to organise visits and contributed constructively to discussions and interviews.

Appendix

Legislative Fire Safety Enforcement

Item 1. Risk categorisation of premises for fire safety audit

Accurate risk categorisation of non-domestic premises is necessary so that an enforcement policy can be based on risk, that enforcement resources are appropriately allocated, and that policy development is informed by accurate statistics.

The risk methodology generally used by the predecessor FRSs uses the FSEC software which provides scientifically-derived, consistent risk levels. This software provides the risk level of the premises where fire safety audits have been carried out and can be used to assist with determining the scheduling of audits and allocation of resources to areas which have the greatest number of premises which pose the highest risk to life.

In FSEC, there are 17 different occupancy types. The use of occupancy types allows comparison of generic risk between the different types of premises. 15 of these occupancy types are relevant to non-domestic fire safety in Scotland, these are shown in Table 1. Occupancy types are described by a designation letter and a short generic description.

Occupancy Type	Generic Description*
A	Hospitals and prisons
B	Care homes
C	HMOs of 3 or more storeys
E	Hostels
F	Hotels
H	Other sleeping accommodation
J	Further education
K	Public buildings
L	Licensed premises
M	Schools
N	Shops
P	Other buildings open to the public
R	Factories/Warehouses
S	Offices
T	Other workplaces

Table 1 – FSEC occupancy types

*The description in the table is not necessarily an exclusive description, but is a short generic title

With the FSEC system, the level of risk in individual premises is indicated by a **Relative Risk Score** for the premises. This unique numeric score depends on the size, fire safety management, occupancy etc. of the premises, and allows the societal life risk in individual premises to be compared against the risk in all other (assessed) premises.

To allow life risk to be compared within each occupancy type, risk scores are banded into risk bands – ‘very high risk’, ‘high risk’, ‘medium risk’, ‘low risk’ and ‘very low risk’ bands. Table 2 shows, for comparison only, the relative position of generic risk bands for the occupancy types and the relationship between risk bands in different occupancy types. In Table 2, the greater the relative risk score, the greater the risk.

	Relative risk score	Occupancy type										
		A	E	B	C	F	N	H	J, K, L, M, P	R, T	S	
↑ RISK		VH										
		H										
	6	M	VH	VH	VH							
			H	H	H	VH						
						H	VH	VH				
	5	L	M	M	M		H	H				
						M						
		VL					M	M	VH			
			L	L					H	VH		
			VL		L	L				H	VH	
	4			VL	VL		L		M		H	VH
						VL	VL			M		H
							L			M		
							VL				M	
3								VL		L		
									VL		L	
										VL		
											VL	

VH: Very High, H: High, M: Medium, L: Low, VL: Very Low.

Table 2 – Generic risk bands

Source: adapted from Table 1 of Fire and Rescue Service Circular 53/2009.

While generic risk bands allow a comparison within the specific occupancy type, they do not allow comparison across occupancy types. To give an example of this, a warehouse (occupancy type R) which is very high risk has a similar level of risk as that of hospitals (occupancy type A) which fall into the very low risk band; the warehouse risk is only very high relative to the general level of risk in warehouses.

When comparing risk across all occupancy types, this requires consideration of the relative risk score rather than consideration of generic risk bands. A policy which uses the FSEC risk methodology and where audit priorities are determined only on the basis of occupancy type or risk bands will not be uniformly targeting enforcement at premises which have the greatest risk to life and may not be robust.

UK Government guidance²⁷ in respect of fire safety audits, advises that relative risk scores, (which can be banded across all premises types) is an appropriate method of determining audit scheduling. The guidance contains a banding system for relative risk scores across all premises types and this is shown in Table 3. Relative risk bands are the categories used in the Scottish Government’s statistical reporting²⁸.

Relative risk score	Description
6	Well above average
5	Above average
4	Average
3	Below average
	Well below average

Table 3 – Relative risk bands

²⁷ DCLG, *Fire and Rescue Service Circular 53/2009 Revised IRMP Guidance Note 4. A risk based approach to managing a fire safety inspection programme*, 2009

²⁸ Scottish Government, *Fire and Rescue Services Statistics, Scotland 2012-13* Chart 8

Table 4 shows the relative risk bands overlaid on the FSEC generic risk table. The occupancy types shown in red are broadly representative of those subject to annual audit in the FSEC framework. This shows that one of the strengths of the SFRS approach is that almost all premises which fall into the 'Well above average' or 'Above average' bands will be subject to annual audit (though audit policy on prisons is not yet issued.) A potential area of weakness in the audit policy is that there is no consistency in respect of premises which fall into the 'Average' risk bands.

RISK	Relative risk score	Occupancy type									Relative Risk bands	
		A	E	B	C	F	N	H	J, K, L, M, P	R, T S		
6		VH										Well above average
		H										
5		M	VH	VH	VH							Above average
			H	H	H	VH						
		L		M		H	VH	VH				
4		VL	M		M	M	M					Average
			L	L				M	VH			
			VL		L	L			H	VH	VH	
3				VL	VL		L		M			Below average
						VL	VL	L		M	H	
								VL	L	M	M	
2												Well below average
									VL	L		
1												Well below average
										VL		

Table 4 – relative risk bands overlaid on the FSEC generic risk table

Legislative Fire Safety Enforcement

Item 2. Houses in Multiple Occupation

HMOs are 'relevant premises' for the purposes of Part 3 of the 2005 Act and dutyholders are subject to the provisions of fire safety law. Based on the most recent Scottish Government housing statistics²⁹ there are around 14,000 HMOs in Scotland.

In addition to the fire safety regime, HMOs are subject to the mandatory licensing scheme in the Housing (Scotland) Act 2006. HMOs which have a licence and HMOs which require a licence are both 'relevant premises', fire safety legislation applies by virtue of the way that the premises are used, not by the existence of a licence.

Anecdotally, it is common for HMOs to be described as being high fire risk. However for fire safety enforcement purposes, premises are recorded under FSEC occupancy types so that a standard risk categorisation approach is achieved. The recording of HMOs using FSEC occupancy types has historically been problematic and there has been a lack of clarity with risk levels.

Research³⁰ into fire safety in HMOs was carried out for Government a number of years ago. This identified that risk varies significantly between HMOs. The report indicated that there were a number of risk factors associated with HMOs and that for some types of HMO, the risk of death from fire was considerably greater than comparable single occupancy property, but for others there was little or no additional risk. HMOs of three or more storeys were identified as posing a relatively high risk and hence warranted priority for enforcement of statutory duties.

The fact that HMOs of three or more storeys have an elevated risk level is reflected in the FSEC categorisation system. Under the FSEC system, HMOs of three or more storeys fall into occupancy type C while HMOs comprising less than three storeys fall into occupancy type H, a category with lower generic risk³¹. The difference in generic risk between these occupancy types can be seen in Table 2.

One weakness with the use of FSEC occupancy types has been the use of short generic descriptions. In the text description of occupancy type C, the term 'HMO' is often incorrectly used instead of the correct description which is 'HMO 3 or more storeys'. This adds to the confusion. The fire safety enforcement framework contains no acknowledgement of different risk levels within different types of HMO and incorrectly uses the shortened description of HMO in its FSEC occupancy type table. Definitive guidance³² on risk-based audit scheduling issued by CLG contains an example of the use of the correct description of HMO.

A consequence of using incorrect occupancy type categorisation is that incorrect risk category may be used and that resources are targeted at HMO audits when premises with a higher life risk go unvisited.

²⁹ Scottish Government, *Housing Statistics for Scotland 2013*

³⁰ Wright, M, *Fire risk in Housing in Multiple Occupation. Research Report for DETR, 1997*

³¹ ODPM, *FSEC toolkit review manual 2006*

³² DCLG, *Fire and Rescue Service Circular 53/2009 Revised IRMP Guidance Note 4. A risk based approach to managing a fire safety inspection programme, 2009*

The Scottish Government identified difficulties with the recording of HMOs by the predecessor FRSSs and requested that HMOs be reported as a single category for publication in its most recent statistical report³³. One consequence of reporting all HMOs as a single category is that the distinction between the different FSEC risk categories cannot be applied.

One of the aims of the 2005 Act was that fire safety should be dealt with under the 2005 Act and not by licensing or registration legislation. Accordingly, the ability of the HMO licensing scheme to apply fire safety provisions has been restricted by section 71 of the 2005 Act. While it should not be imposing fire safety provisions, the licensing authority can take into account whether dutyholders are complying with fire safety legislation and there is provision in the legislation for the licensing authority to consult the SFRS.

The licensing scheme operates with a three yearly licence renewal default but at least one authority offers an annual renewal option. This authority's area contains 41% of the HMOs in Scotland

Arrangements for engagement with the licensing authority differed between the predecessor services. SFRS policy is to audit high risk HMOs annually and otherwise, in line with the licensing renewal frequency. One consequence of this is that potentially HMOs with average or below average risk will be audited annually for no other reason than the licensing authority offers this renewal frequency to landlords.

The issues with the SFRS policy are:

- it contains no acknowledgement of different FSEC risk levels within different HMO types
- it contains audit frequencies that are not wholly based on risk
- it is substantially designed to support the licensing scheme rather than discharge responsibility as 2005 Act enforcing authority.

SFRS, as the enforcing authority for the 2005 Act, has primary responsibility for fire safety enforcement in HMOs and should be auditing premises and allocating resource in line with the level of risk in premises.

³³ Scottish Government *Fire and Rescue Services Statistics, Scotland 2012-13*

Community Safety

Home Fire Safety Visit LSO Area Targets

LSO Area	Area performance 2012-13	2013-14 Target
Glasgow	5,673	6,500
North Lanarkshire	1,877	2,400
South Lanarkshire	2,240	2,700
Dumfries and Galloway	1,000	1,200
E, N and S Ayrshire	4,673	5,000
E & W Dunbartonshire, Argyll & Bute	2,896	3,400
Renfrewshire, E Renfrewshire and Inverclyde	4,122	4,500
Edinburgh City	3,159	3,600
East and Midlothian, Scottish Borders	2,609	3,100
West Lothian and Falkirk	2,174	2,600
Stirling and Clackmannanshire	1,388	1,700
Fife	4,509	5,000
Aberdeen City	369	2,500
Aberdeenshire and Moray	548	1,000
Dundee, Angus, Perth and Kinross	15,425	15,500
Highlands	3,414	4,000
Orkney, Shetland and Western Isles	891	1,000
TOTAL	56,967	65,700

Source: SFRS P&P Directorate



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