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# **HM Fire Service Inspectorate**

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## **Assessing the Effectiveness of Inspection Activity**



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**Integrity, Objectivity, and Fairness.**



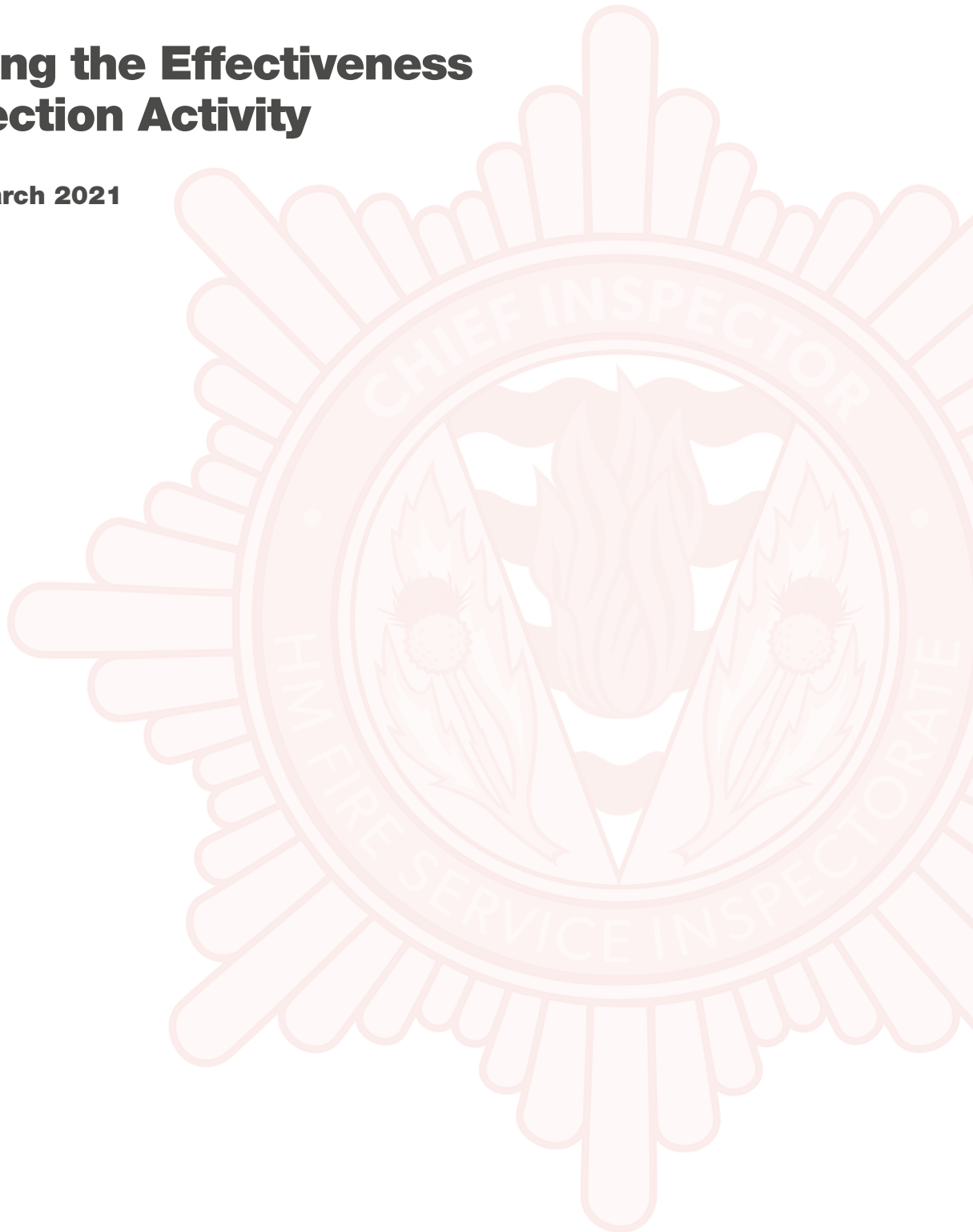
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**Published March 2021**



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# Acknowledgements

We are grateful to the SFRS Strategic Leadership Team (SLT) and those members of staff who provided us with information and helped us to organise visits and interviews. We thank all who contributed constructively to interviews.

The Inspection team members were:

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A quality assurance review of this report was carried out by Assistant Inspector Rick Taylor.

All the members of the inspection team contributed to the development of this report and the quality assurance check 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.

Laid before the Scottish Parliament by HM Chief Inspector of the Scottish Fire and Rescue Service under section 43C(5) of the Fire (Scotland) Act 2005 March 2021 SG/2021/42.

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# 1 Introduction

1. Her Majesty's Fire Service Inspectorate in Scotland (HMFSI) operates as a body within, but independently of, the Scottish Government. Inspectors have the scrutiny powers specified in section 43B of the Fire (Scotland) Act 2005 'the 2005 Act'. These include inquiring into the state and efficiency of the SFRS, its compliance with Best Value, and the manner in which it is carrying out its functions.
2. After a gap of a number of years, the HMFSI inspection role was re-established in 2013 when a single public fire and rescue service was created in Scotland. Further information about HMFSI is contained in appendix 1.
3. Inspection is, by definition, at the heart of what HMFSI does. Since 2013, HMFSI has published 14 thematic inspection reports, and since commencing a rolling programme of Local Area Inspections (LAIs) in January 2015, has published 13 LAI reports. The reports are available on the HMFSI webpages at [www.gov.scot/fireinspectorate](http://www.gov.scot/fireinspectorate).
4. The thematic reports are laid before the Scottish Parliament and issued to the Service. The LAI reports are issued to the relevant SFRS Local Senior Officer (LSO) and are not laid before the Scottish Parliament. The thematic reports normally cover Service-wide issues while the LAI reports are intended for the LSO and cover local issues, though the LAI reports can at times contain recommendations on national issues.
5. The SFRS has a legal obligation under section 43E of the 2005 Act to have regard<sup>1</sup> to HMFSI reports given to it and, having done so, must take such measures (if any) as it thinks fit in relation to the report.
6. It can be difficult for scrutiny bodies to evaluate the impact of their scrutiny activity. For example:
  - it can be difficult to distinguish whether something happened as a result of scrutiny, or if the same thing would have happened regardless
  - the body being scrutinised has ultimate control over putting the findings of scrutiny into practice
  - an organisation can be subject to scrutiny from a number of different scrutiny bodies
7. We decided that it would be valuable to look back at a section of our work: to consider the extent to which the findings and recommendations of our reports have been adopted by the SFRS, and to draw some conclusions. We carried out this work as an inquiry under section 43B of the 2005 Act.

<sup>1</sup> There is information on 'having regard' in an English High Court of Justice [judgement](#)

## 2 About the inspection

8. We considered that there are a number of ways to realistically review our work. These include:
  - looking at the SFRS decision-making and recording systems for considering the recommendations in our reports
  - speaking to relevant SFRS managers who are involved in decision-making processes
  - determining how recommendations in our reports have been adopted by the SFRS and the extent of that adoption
9. During our fieldwork we realised that it would be impractical and inefficient to consider all previous recommendations. Therefore we reviewed a wide number of recommendations, but ultimately concentrated on and wrote up details on a small number of key recommendations, to give ourselves and our contacts in the SFRS, an equitable workload and to produce a more succinct report.
10. We thought that selecting recommendations which we know to have been implemented may add little to our understanding. Therefore we selected some recommendations which had not been implemented because actions being taken in response are ongoing or long-term in nature and will take time to demonstrate impact.
11. We also spoke to the following in order to obtain feedback on their view:
  - Audit Scotland, because it has significant professional expertise in scrutiny and HMFSI has a statutory responsibility to co-ordinate our work with Audit Scotland
  - SFRS Board Members with experience of scrutiny of the implementation of our recommendations
  - The Fire and Rescue Unit of Scottish Government, representing a significant stakeholder interest of Scottish Government in our activities
12. Another area which we wished to reflect on is the burden of scrutiny on the SFRS – which is particularly relevant, given the number of bodies which have scrutiny functions in relation to it. Although the existence of a scrutiny function imposes a perceived burden on the body being scrutinised, that does not mean that we should not evaluate what we are doing in order to ensure that it is proportionate, and does not over burden the SFRS in delivering its functions.
13. We have been interested in assessing the way in which the SFRS has ‘had regard’ to our reports – which it is required by law to do. This report has however given us an opportunity to self-reflect on our own reporting.
14. The fieldwork for this inspection commenced early in March 2020 but was then put on hold for a time due to the restrictions imposed in response to the COVID-19 pandemic. Fieldwork recommenced in late 2020.

### 3 The SFRS’s process for ‘Having Regard’

15. As explained in section 1, the SFRS is required to have regard to HMFSI inspection reports.
16. When HMFSI completes a thematic report, a draft copy is sent to the Service to obtain feedback on the draft in respect of factual accuracy and professional judgement. Draft documents are distributed internally to the relevant SFRS executive and staff and feedback is collated. This is currently undertaken by a SFRS Business Support Team.
17. A similar consultation for LAI reports is undertaken with the relevant LSO.
18. Our consultation process is subject to a Consultation Protocol<sup>2</sup> (which is reviewed and updated periodically).
19. During the course of our inspection, the SFRS introduced a new system for the oversight of implementing the recommendations from external scrutiny.
20. When HMFSI published a final thematic inspection report, the previous system involved the SFRS Service Improvement Team (SIT) analysing the report to create an action plan with input from SFRS subject matter lead officers. An objective was to create actions which meet the SMART criteria.
21. Action Plans were supervised by a group of SFRS staff under the umbrella of the ‘Performance Improvement Forum’ (PIF). The role of the PIF was to provide a robust approach to performance improvement. The PIF in turn reported to the SFRS Corporate Assurance Board. The process was aimed at providing the Service Delivery Committee (SDC) and the SFRS Board with assurance that the SFRS had robust improvement review in place.
22. The PIF had formal minuted meetings to monitor and discuss reports and decision-making, and the progress of action plans. The PIF considered action plans on a six monthly basis, where appropriate a closure report of actions was considered. The PIF supplied a report to the SDC with biannual performance update on the response to reports.
23. In addition, there was a quarterly update for the SFRS response to national recommendations arising from LAI reports.
24. The Service used a BRAG rating scheme in its performance updates to monitor the progress of actions. The scheme is shown in Table 1.

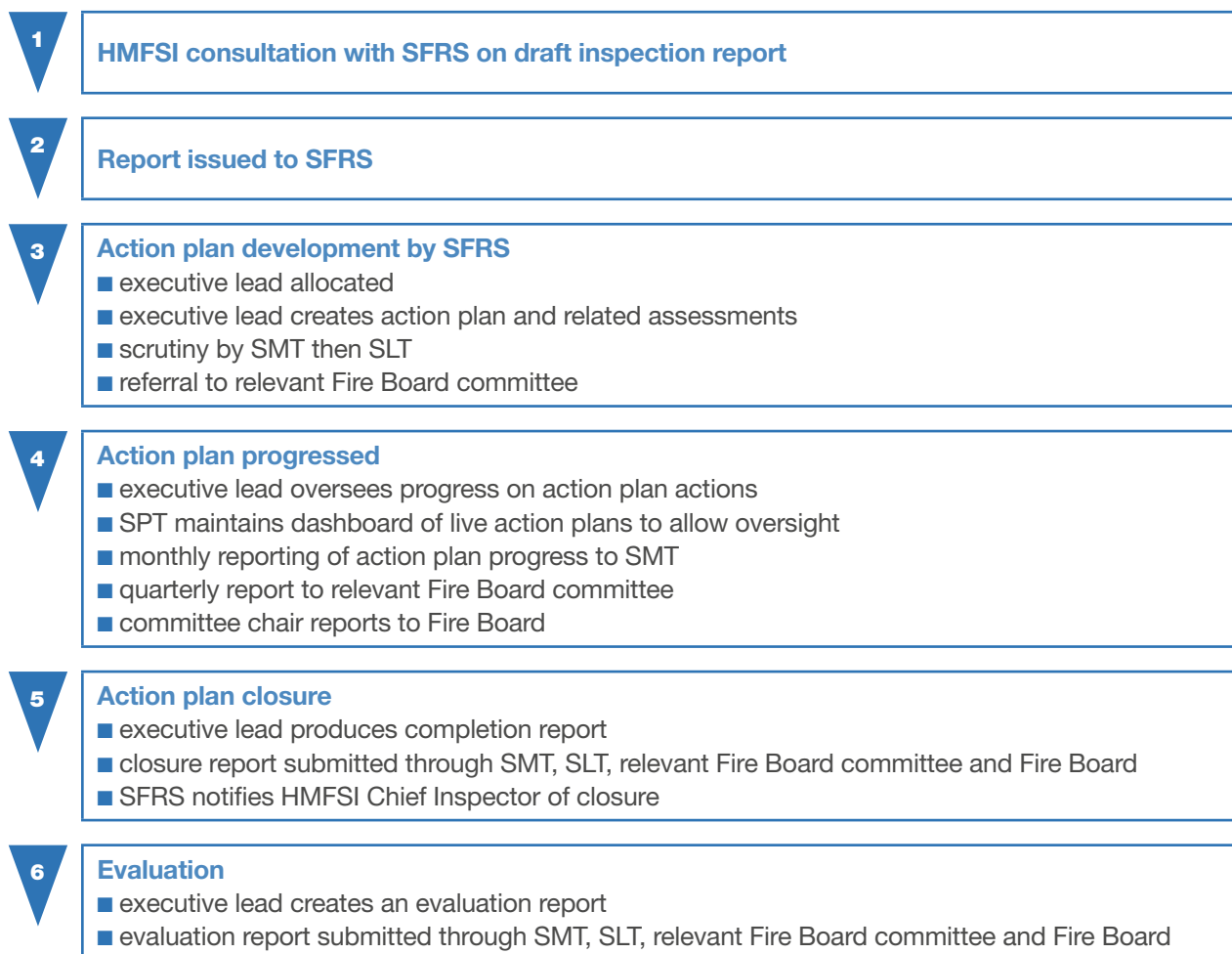
<b>Blue</b>	actions which are complete
<b>Red</b>	actions which are behind schedule and will not be completed by the target date
<b>Amber</b>	actions which may not be completed by the target date
<b>Green</b>	actions which are on track

Table 1 PIF BRAG categories

<sup>2</sup> <https://www.gov.scot/publications/hm-fire-service-inspectorate-consultation-protocol/>



25. The Service's [revised arrangements](#) for management of external scrutiny reports is shown in figure 1. The arrangements involve a Senior Management Board having oversight of scrutiny inspection action plans. A Strategic Planning Team prepares a report to the SLT which in turn appoints an executive lead to prepare a prioritised action plan and conduct impact and risk assessments but with the support of the Strategic Planning Team.
26. The SFRS's Senior Management Team (SMT) considers and agrees the action plan, and impact and risk assessment. The SLT considers and approves the action plan and recommends to the scrutiny committee. The relevant committee then scrutinises the action plan. The executive lead officer ensures progress on action plans is updated by action owners on a regular basis, and if required prepares exception reports. The Strategic Planning Team prepare a monitoring dashboard of all live action plans on a monthly basis and oversees preparations of cyclical progress reports. Reports are then submitted to SMT and quarterly to the relevant committee. The committee's consideration of the reports is then reported to the SFRS Board.



**Figure 1 SFRS management of inspection reports**

## 4 The impact of recommendations in HMFSI inspection reports

27. HMFSI has a process for following up on the SFRS's actions from our thematic inspection reports and for our LAI reports.
28. For the purpose of this inspection we selected some recommendations and comments from inspection reports to investigate. These are recommendations that are contained in reports<sup>3</sup> that were issued prior to the introduction of our follow-up arrangements.
29. We are mindful that some of our recommendations can be time-limited in so far as they are relevant at the time of issue, but issues can change and the relevance, importance and currency of recommendations can change, particularly given the early evolution of the SFRS. We have taken this into account in selecting which recommendations to follow-up.
30. The sample of recommendations we selected for investigation relate to the following issues:
  - the development of the Retained Duty System (RDS)
  - pre-planning for flooding
  - reducing unwanted fire alarm signals (UFAS)
  - fire safety enforcement
31. RDS and UFAS were selected as important areas where there had been little movement because actions being taken in response to our recommendations are ongoing or long-term in nature, but where we hoped to keep a continuing focus on the subject.
32. We have listed these recommendations and considerations in tables 2 to 5 and after each table we provide a narrative.

<sup>3</sup> The eligible reports are listed in appendix 2

## The development of the RDS

Report	<b>Equal access to national capacity</b> May 2014
Issue to consider	The long-term sustainability of the RDS/volunteer service is in question. We strongly support the recently initiated review of the RDS/volunteer service and encourage SFRS to develop previously untried solutions, as we think that many efforts have been made to date which have not been able to bring about fundamental change.
Report	<b>Planning and Defining Service Resources in the Scottish Fire and Rescue Service</b> September 2015
Recommendation	We encourage the Board and the SLT to continue in their efforts to secure service improvements at a time of fiscal austerity, by considering innovation and change in the implementation of the Emergency Cover Review and the RDS review.
Report	<b>Western Isles local area inspection</b> October 2015
Recommendation	The SFRS should introduce a greater flexibility in the way it staffs and crews emergency appliances in line with thinking which is evolving from the RDS and Volunteer review.

Table 2

33. It has been generally accepted that there are challenges to the viability of the RDS and that it is difficult to address these challenges and introduce change. Problems pre-date the creation of the SFRS and are not unique to Scotland. Recommendations on the development of the SFRS RDS have appeared in three of our reports as shown in table 2.
34. The SFRS fire cover model provides for RDS-crewed fire appliances to be available 24 hours a day, 7 days a week. In practice this was not being universally achieved. During the course of our inspection field visits, we were repeatedly advised by local staff of the fragility of many RDS (and Volunteer Duty System (VDS) crewed) appliances. Although there were examples of strong, viable units, many RDS units across the country had long-term and growing difficulties in attracting and retaining staff and providing operational fire cover for 24 hours a day, 7 days a week.
35. Part of the background to our recommendations is that it was our view that protocols for station availability and appliance response were unnecessarily restrictive. Staff are required to book 'unavailable', potentially making a station or appliance unavailable, if they are more than six to eight minutes from the fire station. We suggested that a new category of 'delayed availability' could be introduced for staff and stations, to recognise that it may take an extended time to assemble a crew at some times of the day, but for many locations it may still be much quicker to do so than to wait for an appliance from another fire station to attend.

36. Another example of prescriptive rules is that staff who required only a short period of time off, for example a few hours, were required to make themselves unavailable for a longer period of time.
37. Additionally, we believe there was scope for the SFRS to consider how personnel from neighbouring fire stations might be aggregated to form a full crew and maintain a response capability, even when individually those stations are unable to muster a full crew. We were aware of a pilot that had been run on Islay where personnel from more than one station would be mobilised if there was insufficient numbers of personnel to crew an appliance at the fire station closest to the incident.
38. However, these are only specific examples of potential change and our recommendations were made to encourage and assist the Service with the review and on bringing about fundamental and innovative change and flexibility to the RDS.
39. The SFRS created an action plan for all the recommendations in the 'Equal Access' report. The action plan acknowledged the problem with RDS fire cover and proposed that the RDS and Volunteer project (which was then in place) would consider standardising and consolidating a sustainable RDS and Volunteer service in the short to medium-term, and to explore future options for medium to longer-term which will be visionary, bold and innovative. Progress on the action plan was reported to the Audit and Risk Assurance Committee (ARAC) meeting on a 6 monthly frequency commencing on 16 September 2014. The action plan proposed examination and review of personnel response times, recruitment, selection, contracts, promotion, annual leave, personnel development, integration opportunities, and greater resilience to appliance availability.
40. The SFRS action points relevant to this recommendation were signed off as complete in 2016. Although the actions were annotated as complete, the Service was unable to complete some actions at that time and those actions then became part of a further wider, later developed project, the Service Delivery Model Programme Framework.
41. The recommendation in the 'Planning and Defining' report was reported at ARAC as already complete with work ongoing as part of other workstreams.
42. The recommendation in the Western Isles LAI report is a national issue in a local report. We have not been able to find anything recorded about actions taken in relation to this recommendation. Though the Service identifies that it now has a procedure to consider such national issues referred to in LAI reports.
43. A SFRS review of fire and rescue provision commenced in April 2014 with the aim of providing an accurate picture of fire station locations to identify obvious gaps, duplication or over-provision in service delivery, to inform a standard approach to all areas of emergency response.

44. More recently, in June 2019, the Service has created a Service Delivery Model Programme Framework, the work on this is ongoing which contains a RDS/VDS Strategy project. The declared purpose of this RDS/VDS Strategy project is to maximise the use and associated benefits of on-call firefighters, ensuring the provision of an appropriate balance of prevention and protection and emergency response services to communities across Scotland.
45. The project is being undertaken in three phases, phase one 'Research' was due to conclude in October 2019 (this was later changed to Q3 December 2019, with a report, taken in private, to the Transformation and Major Projects Committee in February 2020). The phase 1 report was considered in February 2020. SFRS Board Standing Orders enable the Board and its committees to discuss matters in private. HMFSI understands the need to be able to do this at times, however, our ability to track progress on actions when they are addressed in private is obviously restricted.
46. The RDS/VDS project will seek to create an overarching strategy to identify other initiatives and improvements that can be implemented to further support and strengthen the Retained and Volunteer duty systems. It is anticipated that the focus will be on but not limited to recruitment, retention, response models, station duties and enhanced engagement.
47. One change that has been implemented by the Service is the creation of the role of a RVDS support Watch Commander. In January 2019, SFRS appointed 18 staff to these posts to act as support officer for RDS and VDS fire stations. There has been a further appointment process which should lead to the appointment of a further 18 posts, at the time of writing a third phase is due to deliver 18 more posts in January 2021 in a number of areas across the country, giving a total of 54 posts. The posts are being allocated to geographic clusters of fire stations, with the type of support provided varying across the country as dictated by the LSOs.
48. The Service's assessment<sup>4</sup> of these posts for the period 14 January to 30 June 2019 was that there were 254 instances of where appliances were enabled to turnout as a result of the post. During that period 5,668 hours of appliance availability were provided by these support Watch Commanders. Our limited assessment of these posts from an LAI perspective has been positive.
49. The positive impact of these officers goes beyond the simple increase of appliance availability into providing wider areas of support, such as administrative functions, gathering of risk data, training, etc. The creation of these posts has resulted in an increase in the establishment of the Service and therefore the employee and additional associated costs. The Service, however anticipates that the recruitment of these posts will be offset by the future rebalancing of existing wholetime resources, but that would be subject to the successful delivery of other Transformation projects.

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<sup>4</sup> Rural Full Time Posts Project Closure report TMPC committee 7 November 2019

50. The SFRS had the additional challenge of addressing different conditions of service between the predecessor organisations. But other than some standardisation and the creation of support posts, the position with the RDS in 2020 is not much different from when we issued our reports. While there has been a previous Service review and an ongoing review, there have been no fundamental changes to RDS conditions or to fire cover modelling affecting the RDS.
51. Our recommendations have offered external influence to highlight issues but cannot be seen as having brought about significant change. We do acknowledge the interdependency with other resource allocation issues and the difficulty in addressing the challenges that exist with RDS availability.
52. The issues surrounding the RDS are complex and connected to wider problems such as recruitment, retention and training, which have a link to crewing and availability. Through the earlier studies conducted, the Service has an awareness of the problems that need resolving. However, to an outside observer there appears to be inertia in implementing change given the Service's understanding of the problems that exist. This may be linked to ongoing negotiations involving changes to national conditions of service and national employment arrangements. We see the introduction of the RVDS support Watch Commanders as a welcome positive step. Given the relative importance of RDS and Volunteer firefighters, crewing almost 80% of SFRS fire stations, we continue to support efforts to create duty systems that can flexibly recognise the important role played by these firefighters in providing a service to their communities, while recognising that what will be a good solution for one community might not be appropriate for another.

### Pre-planning for flooding

Report	<b>Preparedness of the Scottish Fire and Rescue Service for a serious flooding event</b> October 2015
Recommendation	SFRS development of national policy and procedures for flooding is underway. It is important that this work is completed, and that partner agencies can be fully briefed on SFRS capabilities at a serious flooding incident for planning purposes, and we recommend that development work on these policies and procedures is completed as soon as practicable and shared with partner agencies as appropriate.
Recommendation	The SFRS should ensure that level 1 (water awareness) training is completed by all its front-line staff, with particular reference to the North SDA, and a needs analysis should be carried out, again with particular reference to the North SDA, to identify, train and equip an appropriate number of level 2 (flood first responder) staff to participate in and support flood operations.

Table 3

53. We commenced the inspection in May 2015. The purpose was to consider the way in which the SFRS had planned to carry out its functions under the Fire (Additional Function) (Scotland) Order 2005 in relation to serious flooding and, in particular in relation to our first recommendation above, we sought to establish, among other things:

*How it has defined the limits of its responsibilities under legislation and secured a common understanding of them among other relevant agencies, including the definition of 'serious flooding'.*

54. At the time of our fieldwork the SFRS was working on the development of policy and procedures for flood response, which was to be completed by the end of 2015.

55. The initial SFRS action plan for this report was presented to the ARAC meeting in June 2016 in which it was detailed that the Service intended to carry out two actions to address this recommendation:

- to finalise the SOP 'Water Rescue Incidents', (which was in its consultation phase); and
- to carry out Water Rescue Training.

56. One item in the SFRS action plan, in response to our second recommendation in table 3, was marked as 'no longer pursuing', in relation to training, because the Maritime and Coastguard Agency wouldn't sign a Memorandum of Understanding (MOU). It is not clear to us now what the relevance of the proposed MOU was in response to our recommendation. However, we believe that this highlights that HMFSI missed an opportunity at the time to seek clarification from SFRS on its proposed course of action as it stated it was no longer pursuing. Had we done so, we would have been able to assess whether the SFRS had misinterpreted the intention of our recommendation or not, and to consider the appropriateness of the SFRS's intention to not pursue action.

57. A closure report of the actions taken for all the recommendations in the report was considered at the meeting of 3 July 2018. Although the action to carry out water rescue training was marked as complete, not all water rescue stations had concluded the training of personnel and it was reported that training was still on-going at four remaining fire stations.

58. As we have referenced earlier in this report, in other action plans, actions were marked as complete when in fact the action had been passed to another workstream to take forward. The new arrangements for monitoring action plans implemented by ARAC, mentioned earlier, allow for the recording of an action as being 'transferred', where it is managed and scrutinised through another forum, such as the Programme Office. This should ensure that a complete and auditable trail exists for our report recommendations.

## Reducing UFAS

Report	<b>Managing Automatic Fire Signals</b> October 2015
Recommendations	<ol style="list-style-type: none"> <li>1. We think that the suite of policy and procedure documents is unnecessarily complex and recommend a significant simplification in the next iteration.</li> <li>2. We recommend that a consistent PDA should be planned for calls originating from automatic fire signals where the cause of actuation is unknown, regardless of how that call is transmitted to the SFRS.</li> <li>3. We recommend that the Scottish Fire and Rescue Service should reflect on the reports by Mott MacDonald and DCLG on speed and weight of response to AFA calls referenced in this report, and if it intends to continue to take a different approach, it should explain why.</li> <li>4. We recommend that the Board and Strategic Leadership Team of the Scottish Fire and Rescue Service consider numerical targets for a reduction in calls responded to which have been received from automatic systems, and the number of 'blue light' journeys made by fire appliances to automatic fire signals.</li> </ol>

**Table 4**

59. The SFRS attends a large number of calls which turn out to be false alarms. SFRS incident statistics show that in 2019/20, the Service attended a total of 91,971 incidents and that 57.8% (53,122) of these incidents were false alarms. A substantial proportion of these false alarm calls are designated by the Service as UFAS calls. SFRS performance reporting indicates attendance at 29,171 UFAS calls in 2019/2020. This represents around 32% of all calls attended by the Service.
60. Our report was issued at a time when the Service had standardised its UFAS policy, a change which in some cases, introduced an increased PDA to suspected UFAS calls in some parts of Scotland. At the time of the inspection we felt that although the intent of the SFRS policy was clear, in its aim to provide a single national framework to target demand reduction, we found it difficult to understand the detail as we felt it was overly complex. Through our interviews we found that staff were interpreting the policy differently.
61. One detail that was identified was that the policy allowed a reduction in attendance to an AFA in some circumstances, but not where a call was received through an Alarm Receiving Centre (ARC). HMFSI believed there was a 'conflict of logic' between two elements of the Service policy. An automatic fire alarm call received via an ARC (or auto-dialler) attracted a 'full fire PDA'; and a call received via a person calling from a premises where an automatic alarm has actuated, who cannot confirm whether or not there is actually a fire, results in the PDA with a reduction of one fire appliance being mobilised. These are essentially the same circumstances in both examples, but they were treated differently in the level of response.



62. However the recommendations contained a more general and fundamental challenge to SFRS policy. National reports had been published which identified the potential for 'Variable attendance by Time and Risk', where response is varied by time of day, and building and occupancy risk; and Call Challenge, where response is assumed to be delayed while the call is verified. There was no evidence of this national work having influenced SFRS policy.
63. There were also no targets set for the reduction in calls or 'blue light' journeys. The SFRS reported on the number of UFAS calls it responded to, but at that time did not set reduction targets for them. The Service did not report on the number of 'blue light' journeys undertaken as a result of responding to UFAS calls: this information could only be extracted manually, taking significant time to do so.
64. The action plan in response to our recommendations reported that the SFRS Prevention and Protection Directorate had carried out a review of its UFAS policy during 2015. The review included awareness and understanding of its policy intentions and direction. The findings of the review were then included in a wider action plan covering many areas of UFAS in the Service. The Directorate worked with Service Delivery and Response and Resilience to progress arrangements to automatically reduce the number of appliances sent to identified premises types on receipt of an automatic alarm to the SFRS.
65. The progress of the SFRS action plan was reported to the SDC and all recommendations signed off as complete in 2018.
66. A further paper was presented to the SDC meeting of 4 December 2018. This paper set out to provide an update on UFAS response strategy currently under consideration which is predicated on time and risk factors. The paper stated that 'Following the submission of a UFAS response options paper to the Board in March 2018, it has been agreed that the SFRS should adopt a time and risk response model to AFA calls from non-domestic premises.' The paper concluded with next steps, and set out that 'a further paper will be produced detailing an implementation strategy alongside timescales and any impact or benefits on service delivery.' The work and research to provide a response based on risk and time was on-going and not complete.
67. In February 2018, a 15% reduction over a three year period was set as a Service wide target. According to the closure report on 13 September 2018, the Service do not report on the number of 'blue light' journeys undertaken as a result of responding to UFAS calls. This work has been highlighted as an area to be explored as part of the Command Control Futures project, which is implementing a new single system across the three SFRS control rooms. This is done with a view to simplifying the process by which individual 'blue light' journeys can be recorded.
68. It is still the case that the Service doesn't report the number of 'blue light' journeys and the counting of journeys isn't included in the Performance Management Framework.

69. At a meeting of the SDC on 12 March 2020, a paper was brought forward outlining plans for reducing UFAS demand. The plans provided the basis of a project, upon which the following priorities would be delivered:
  - mainstreaming best practice UFAS initiatives across the country; and
  - consolidating the SFRS's overall approach to managing UFAS.
70. In consolidating the SFRS's overall approach to managing UFAS, the Prevention and Protection function committed to conducting a UFAS Stocktake Review – a detailed examination of the effectiveness of the SFRS's UFAS arrangements, and a key action within the SFRS's Annual Operating Plan 2020/21.
71. At a meeting of the SLT on 23 June 2020, a report outlining the findings and recommendations of the UFAS Stocktake Review were presented and subsequently approved by the SLT. A Board Strategy Day was held on 30 July 2020 where the highlights of the Review and next steps were set out.
72. A total of 20 recommendations were proposed by the UFAS Working Group as part of the Stocktake Review, subdivided into 'Improvement', 'Change' and 'Implementing Change'. The Stocktake report highlights that, of themselves, the 13 recommendations for improvement are unlikely to address the longer-term challenges of tackling UFAS demand.
73. The SLT approved the recommendations and gave the UFAS Working Group direction to develop a plan that prioritised implementing the recommendations for improvement over the short-term and in parallel with that, take forward the recommendations for change by starting to evaluate potential policy changes.
74. Although work on this is continuing, in May 2020, influenced by the impact of the COVID-19 pandemic, the Service announced that it was changing its response at AFA actuations to a single pumping appliance, with the exception of sleeping accommodation and other specific high-risk premises which will continue to receive either a full or appropriately modified PDA. Premises such as hospitals and care homes will not see any change, as will premises that already have a single pump strategy under the previous policy.
75. The Service intends to evaluate the outcome of the overall impact of this change of policy as a result of the pandemic. The results of this evaluation would then be fed into the UFAS Stocktake Review Project mentioned above. We consider that the implementation, in May 2020, of the revised mobilisation policy should provide a sizable data source to analyse and reach robust conclusions which ultimately could result in a long-term decline in the number of UFAS mobilisations.
76. The HMFSI recommendations comprised two specific and two general recommendations. While general recommendations can be useful at times to allow the Service flexibility in the action it may take to respond to a recommendation, there may be times when flexibility in response may not be appropriate.

77. Although HMFSI has limited knowledge of the detailed work of the Stocktake review of UFAS, we are supportive of activity taken to reduce the negative impact of UFAS calls on the Service. We would encourage the Service to use the opportunity presented by the response to the pandemic and, using this experience, implement changes, such as those identified in the Stocktake review, that will lead to long-term and sustainable reductions in the number of UFAS calls and mobilisations.

### Fire safety enforcement

Report	<b>Planning and Defining Service Resources</b>
Recommendation	Examine the scope to increase the proportion of non-uniformed staff within fire safety enforcement (FSE), including fire engineering, along with a potential expansion of role, as a means of delivering an improved service.
Report	<b>Fire Safety Enforcement by the Scottish Fire and Rescue Service 2018</b>
Recommendations	<p>1. FSE is not fully transparent for dutyholders or members of the public. The SCOP<sup>5</sup> requires the SFRS to publish clear risk assessment methodologies and risk ratings and review these regularly. We recommend that the SFRS does this. This should be part of a move by the Service to embrace an enforcement culture of transparency and accountability. It should also:</p> <ul style="list-style-type: none"> <li>a. Produce fire safety audit guidance which is clear and understandable for dutyholders.</li> <li>b. Proactively make its fire safety audit procedure and guidance available on its website.</li> <li>c. Improve its written communication with dutyholders in line with the SCOP requirement to communicate effectively. An objective of letter writing should be the understanding of dutyholders and the giving of feedback. The Service should also introduce changes to address the issues regarding letter content, listed in section 4.5 of this report.</li> </ul> <p>5. The Service should place less emphasis on quantity (the use of personal fire safety audit targets) and place more emphasis on quality of work and effectiveness.</p> <p>7. The Service should continue to move towards the conversion of uniformed enforcement posts to non-uniformed, and introduce career progression opportunity for non-uniformed staff.</p>

Table 5

<sup>5</sup> Scottish Regulators' Strategic Code of Practice

## Conditions of service


78. Two of our reports contained a recommendation on the increased use of Auditing Officer posts within fire safety enforcement. These reports were issued by different Chief Inspectors.
79. With regard to the Planning and Defining report, the Service had in 2013, a Prevention and Protection Directorate Working Structure which outlined the number of Fire Safety Enforcement Officers (FSEOs) and Auditing Officers (AOs) that were notionally allocated to each LSO area. The split between FSEOs and AOs was based on legacy FRS arrangements. The Service then developed an options paper with options to blend these roles to varying percentages of balance. Work commenced to move towards the blended structure. Local structures were to be further reviewed to ensure resources were in place to match available budgets.
80. AOs made up 17% of FSE staff as at May 2017, the majority of enforcement staff being uniformed FSEOs, working to 'Grey Book' conditions of service, and Auditing Officers working to 'Green Book'. This was the position at the time of our fieldwork for the FSE report.
81. Although the Service accepted all the FSE report recommendations during our informal consultation, the Service subsequently adopted a position that it would not have a programme for converting FSEO posts to AO posts. Career progression and Incident Command resourcing were seen as factors influencing Service policy. However the Service did support the further blend of FSEOs and AOs in response to recruitment challenges.

## Other issues

82. Our FSE report on the inspection of fire safety enforcement contained a number of other recommendations to the Service. We have selected two of these other recommendations for follow-up, though one of the selected recommendations has four separate elements to it. These recommendations refer to increased transparency, communication and quality.
83. An action plan for the FSE inspection was first presented to the SDC meeting of 3 July 2018.

## Transparency

84. There was no information or guidance on the SFRS website about the fire safety audit process even though it is a requirement of the SCOP to publish risk methodology and risk ratings (our report made other comments on risk methodology and risk ratings, which are not considered here).
85. The Service undertook to develop a webpage with a specific information page to dutyholders within the "For Businesses" section on how enforcement activities are delivered.
86. Standardised templates were created for Local Enforcement Delivery Plans laying out the process and methodology for fire safety audits. All plans to be accessible via the "For Businesses" section on the SFRS website.

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87. Guidance on the SFRS audit process has been incorporated into the Local Enforcement Delivery Plans for LSO Areas which will be published on the SFRS internet site in due course. Further guidance is also provided in a pre-audit letter sent to dutyholders at the time an audit is confirmed.
  88. The Prevention and Protection Directorate was unable to directly access the SFRS website to make quick changes and relies on SFRS communications staff to amend the website. A review of the business page for fire safety is being undertaken centrally which will incorporate all appropriate and linked documents alongside the Local Enforcement Delivery Plans.
  89. We have seen local enforcement plans during our LAIs which explain the LSO area strategy for targeting audits, which generally reflect the SFRS Enforcement Framework. There is no information on the risk assessment methodology and risk ratings.
  90. The Service's action plan considers the fire safety audit process and priorities but does not consider implementing the recommendation about risk assessment methodology and risk ratings.
  91. It is still the position that there is nothing relevant on the SFRS website explaining risk assessment methodology and ratings. And the Service reports that it is involved in national developments that may see changes to risk rating systems.

### ***Communication quality***


92. Although we had come across some evidence of excellent communication, the general standard was below this. For example, it was commonplace for letters sent to dutyholders to contain general recommendations which do not relate to any deficiency, prescriptive requirements with no accompanying descriptive explanation or rationale for the action; and the distinction between mandatory and non-mandatory was blurred.
93. The SFRS has recently changed its standard paragraphs which are used by enforcement staff in drafting reports and letters to dutyholders. However, we have received negative comments, from enforcement personnel, during LAI's that the revised paragraphs are poor.

### ***Targets***

94. At the time of inspection there was an emphasis on numbers with a personal audit target of 132 audits per person per year.
95. The Directorate stated it has continued as part of its training events and quality assurance processes, to promote detail and quality whilst undertaking audits and demonstrate full reasoning for comments made. The Directorate also stated it has little concern regarding this recommendation, however it will look to improve upon performance in conjunction with the Fire Safety Enforcement Policy Framework and Local Enforcement Delivery Plans. The SFRS comments in its action plan about targets being too onerous and quality of the completion of audit paperwork appear to miss the point of the recommendation 5 above.

## 5 Conclusions

96. This report differs from our other thematic reports in so far as it contains no new recommendation for the SFRS. We have decided not to include any new recommendations because of the subject area of the report, and it seems to us clumsy and counter-productive to make such recommendations. We have however formed some conclusions in relation to this inspection and reported on some suggestions received.
97. We have mentioned above that we now routinely undertake a review of progress of actions made by the SFRS in response to our reports. For those inspections that we had published before we introduced this routine review process, we intend to continue to annually review progress of actions from those reports. This will be done by monitoring reports made to ARAC.
98. While looking at the Service, this report has given us an opportunity to be self-reflective and consider our own ways of working.
99. Our conclusions are:
  - a) That our inspection work has added value to the SFRS. This is the consistent message we received during interviews.
  - b) The operation of the RDS is still a major challenge to the Service. We continue to support the SFRS in addressing RDS issues.
  - c) The Service has a structured process for considering our recommendations and creating an action plan. Oversight sits at Fire Board committee level where members monitor progress. Board members rely substantially on the expertise of Service senior managers for technical aspects which limits the type of scrutiny available to members. One advantage of HMFSI reports is that they assist the Fire Board to assess how the Service is performing.
  - d) There are some examples where the intent of HMFSI recommendations have not totally matched the action plan implemented by the Service. The follow-up process that we now have in place, will allow greater engagement. However, it has been suggested that there should be additional feedback to the Service which would include Fire Board members. We consider that going forward we need to change the way we engage with the Service to include closer and better engagement with Fire Board members. This would assist Board members with their own scrutiny role and give us greater awareness of the Service's action plans.
  - e) While the Service often has competing priorities, we received feedback that our level of inspection reporting was not an undue burden for the Service.
  - f) To assist the SFRS, our reports need to have clear conclusions and recommendations. Some of our early reports contained terms which did not assist the Service. We have improved our report structure in a way that highlights our recommendations. The SFRS has requested that recommendations are capable of having SMART criteria applied. We think that our current approach to making recommendations achieves this where appropriate, but we will continue to keep this factor in mind.

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- g) Some small differences in the formatting of our reports will assist recipients. This involves including the date of publication in a prominent place, paragraph numbering and recommendation numbering. (We have introduced this change from January 2021).
- h) We received comments regarding aspects of our report construction, and while these are relevant and issues that we are aware of and try to follow, they are worthy of restating here:
- reports should use plain language;
  - rather than emphasising areas for improvement there should also be an explanation of what the Service has achieved and should include positives; and
  - report recommendations should be outcome focused.

## Glossary and abbreviations

An explanation of abbreviations and terminology used in this report can be found below.

AFA	Automatic Fire Alarm
AO	Auditing Officer
ARAC	Audit and Risk Assurance Committee
ARC	Alarm receiving centre
biannual	Occurring twice in one year
DCLG	Department for Communities and Local Government (UK Government)
FRS	Fire and Rescue Service
FSEO	Fire Safety Enforcement Officer
Green Book	Green Book covers the pay and conditions for local authority staff, but can be also used for non-local authority staff
HMFSI	Her Majesty's Fire Service Inspectorate
LAI	Local area inspection
LSO	Local Senior Officer: there is a LSO for each of the 32 local authority areas in Scotland.
PDA	Pre-determined attendance
PIF	Performance Improvement Forum
predecessor organisations	The eight fire and rescue services in Scotland, and the Scottish Fire Services College, that were combined into SFRS.
RDS	Retained duty system
SCOP	Scottish Regulators' Strategic Code of Practice
SDA	Service Delivery Area
SDC	Service Delivery Committee
SFRS	Scottish Fire and Rescue Service
SLT	Strategic Leadership Team of the SFRS; the senior executive officers and Directors.
SMART criteria	Criteria which are Specific, Measurable, Action-based, Realistic and Time-limited.
SMT	Strategic Management Team
SOP	Standard Operating Procedure
UFAS	Unwanted fire alarm signal: A false alarm incident in non-domestic premises where the SFRS is called as a consequence of a fire alarm operating.
2005 Act	The Fire (Scotland) Act 2005



# Appendix 1

## About HM Fire Service Inspectorate

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 Act. These include inquiring into the state and efficiency of the SFRS, its compliance with Best Value, and the manner in which it is carrying out its functions.

HMFSI Inspectors may, in carrying out inspections, assess whether the SFRS is complying with its duty to secure Best Value and continuous improvement. If necessary, Inspectors can be directed by Scottish Ministers to look into anything relating to the SFRS as they consider appropriate.

We also have an established role in providing professional advice and guidance on the emergency response, legislation and education in relation to the Fire and Rescue Service in Scotland.

Our powers give latitude to investigate areas we consider necessary or expedient for the purposes of, or in connection with, the carrying out of our functions:

- The SFRS must provide us with such assistance and co-operation as we may require to enable us to carry out our functions.
- When we publish a report, the SFRS must also have regard to what we have found and take such measures, if any, as it thinks fit.
- Where our report identifies that the SFRS is not efficient or effective (or Best Value not secured), or will, unless remedial measures are taken, cease to be efficient or effective, Scottish Ministers may direct the SFRS to take such measures as may be required. The SFRS must comply with any direction given.

We work with other inspectorates and agencies across the public sector and co-ordinate our activities to reduce the burden of inspection and avoid unnecessary duplication.

We aim to add value and strengthen public confidence in the SFRS and do this through independent scrutiny and evidence-led reporting about what we find. Where we make recommendations in a report, we will follow them up to assess the level of progress.

We will aim to identify and promote good practice that can be applied across Scotland. Our approach is to support the SFRS to deliver services that are high quality, continually improving, effective and responsive to local and national needs. The terms of reference for inspections are consulted upon and agreed with parties that the Chief Inspector deems relevant.

## Appendix 2

### HMFSI thematic reports issued between 2013 and 2019

- Fire Safety Enforcement by the Scottish Fire and Rescue Service 2018
- The Scottish Fire and Rescue Service Operations Control Room in Dundee, and Service Delivery and Support in Highland, Western Isles, Orkney Islands and Shetland Islands 2017
- Emergency Medical Response and the Scottish Fire and Rescue Service
- Planning and Defining Service Resources
- Performance management information systems in the Scottish Fire and Rescue Service
- Managing automatic fire signals 2015
- Preparedness of the Scottish Fire and Rescue Service for a serious flooding event
- Risk-based operational decision-making in the Scottish Fire and Rescue Service 2014
- Equal Access to National Capacity 2015
- An Overview of the Scottish Fire and Rescue Service





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