



# HM Fire Service Inspectorate

<b>Report to:</b>	<b>Director for Safer Communities Scottish Government</b>
<b>Date:</b>	<b>8 April 2020</b>
<b>Report By:</b>	<b>Simon Routh-Jones HM Chief Inspector of the Scottish Fire and Rescue Service</b>

<b>Subject:</b>	<b>Report on the Scottish Fire and Rescue Service's planning and preparedness for COVID-19 (Light Touch Review)</b>
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## 1. Purpose

This report has been provided by HM Chief Inspector of the Scottish Fire and Rescue Service, following a request from the Director for Safer Communities on behalf of the Scottish Government (SG), to provide assurance on the Scottish Fire and Rescue Service's (SFRS) plans and preparedness for COVID-19. The report focuses on three specific areas; Governance, Operational Service Delivery and Critical Support Functions. These areas have been identified as critical to ensure the SFRS can deliver its Statutory Duties as contained within the Fire (Scotland) Act 2005.

The information and evidence has been gathered from SFRS provided documentation, and phone calls together with skype meetings with senior SFRS managers. The information is current at the time of writing this report.

### 1.1. Business Continuity Management (BCM)

The SFRS Business Continuity Management Plans (BCMPs) are based on best practice and guidance under the Civil Contingencies Act 2004. The SFRS gives the responsibility to Heads of Departments for the maintenance, audit and exercising of their individual BCMPs, in conjunction with other departments whose plans may have an interdependence

We have not explored these plans in great detail as they are not new for COVID-19, and have been in existence, tested and exercised in the past following events such as; severe weather (February 2018 'beast from the east'), and European Athletic Championships. These events have provided opportunities for the Service to learn, review and adapt their BCMP arrangements.

The Service has a bespoke seasonal Influenza Pandemic BCMP. We have scrutinised key areas within this business continuity plan.

## **2. Background**

On the 30 January 2020, the World Health Organisation (WHO) declared that the outbreak of a new coronavirus, COVID-19 constituted a public health emergency of international concern. There are many coronaviruses that are transmitted from human-to-human which are not of public health concern, however COVID-19, which is a new strain of the virus, that has not been previously identified in humans, can cause respiratory illness of varying severity. Common signs of infection include respiratory symptoms, fever, cough, shortness of breath and breathing difficulties. In severe cases, infection can cause pneumonia, severe acute respiratory syndrome, kidney failure and even death. Currently, there is no vaccine or specific treatment for COVID-19.

The SFRS, like most other organisations, already has planning arrangements in place for an Influenza Pandemic. The Service has been quick to update plans and supplement documentation with COVID-19 specific guidance for all staff. The suite of documents available and reviewed are:

- General Information Note – Operations Control Resilience Strategy
- COVID-19 Non-Attendance Administration and Management Procedure
- COVID-19 Operational Task Cards
- Influenza Pandemic Business Continuity Plan
- SOP – Delayed Attendance of the Scottish Ambulance Service Protocols
- Business Continuity Plan Response and Resilience Directorate
- COVID-19 Command, Control and Coordination (C3) Framework and Reporting Protocol
- General Information Note – Appliance Withdrawal Strategy
- COVID-19 National Event Operational Plan

The aim of the SFRS during this difficult time is to maintain high standards of Service Delivery within the challenging environment presented by COVID-19.

**With objectives to:**

- Continue to operate efficiently and effectively during this period of uncertainty and disruption
- Ensure that all areas of the Service are prepared and equipped to maintain Service Delivery safely, in the challenging conditions that may be presented
- Ensure that the Health and Wellbeing of all SFRS staff is a key priority (this will be achieved through key messaging and sign-posting to the most current information available from Government and public health sources)
- The SFRS has stated that it will collaborate with all partners in sharing information, intelligence and preventative measures which may be taken.

**3. Findings**

**3.1 Governance**

The main purpose of the SFRS is to work in partnership with communities and with others in the public, private and third sectors on prevention, protection and response to improve the safety and wellbeing of people throughout Scotland. In order to effectively support this strategy during the ongoing crisis, the SFRS has created a bespoke COVID-19 Tactical Action Group (COTAG).

The main purpose of the COTAG is to ensure that the SFRS continues to operate efficiently and effectively, whilst maintaining a high standard of Service Delivery during this period of uncertainty and potential disruption, through effective BCM plans. It is also responsible for ensuring that all areas of the Service are prepared and equipped to maintain service delivery safely, in challenging conditions that may be presented by COVID-19, in support of its aims and objectives.

A Senior Responsible Officer (SRO) at an Executive level has been appointed by the SFRS to chair the COTAG, routinely the ACO Service Delivery, which will convene on a daily basis during normal office hours, with the chair delegated to a duty officer outwith these times. The COTAG Chair will normally be the direct link to the Scottish Government Liaison Officer (SGLO) should there be a need to brief SG directly on behalf of the SFRS Gold Commander.

The COTAG is supported by two sub-groups:

Operational Availability Sub Group – Responsible for:

- Developing a range of scenarios on reduced staff availability
- Reviewing the effectiveness of the Appliance Withdrawal Strategy (AWS)
- Updating the appliance withdraw hierarchy in line with the current situation
- Developing staffing guidance for staff
- Monitoring staff attrition and recruitment scenarios.

Civil Contingencies Sub Group – Responsible for:

- Providing regular COVID-19 information updates to the COTAG
- Acting as conduit for all information supplied by partner agencies to the SFRS
- Providing information to local managers attending LRPs on the current SFRS position.

The COTAG will feed into and offer advice to SFRS Gold, Silver and Bronze Commanders, Operations Controls, Incident/Event Support Rooms, Multi-Agency Coordination Centres (MACCs) and internal Heads of Function. To ensure that all areas of the Service are prepared and equipped to maintain service delivery safely.

### **3.1.1 Reporting**

Any actions coming into the Service are recorded and actioned appropriately, with plans updated as required.

Reporting is carried out on a daily basis beginning with a Common Recognised Information Picture (CRIP) feeding into internal staff briefings culminating in a Scottish Government Submission at 14.30 hrs every day, giving a summary of the SFRS response readiness.

The SFRS has a robust Governance Structure and Reporting Protocol which is well developed, and has an appropriate weight of authority and support to play an accountable and leading role in mitigating the effects of the crisis.

### **3.2 Service Delivery**

The SFRS has produced a comprehensive suite of documents in support of its COVID-19 response, which are continually being refined and updated as more intelligence is gathered, guidance produced or challenges emerge. At the time of writing, some of the finer detail was sparse but we are assured that documents are continually updated as guidance evolves.

It can be reasonably assumed that business as usual will be negatively impacted by potentially high levels of staff absence. Furthermore there exists a possibility of a significant and swift reduction in the Service's operational response. At the time of writing, the SFRS is reporting that the level of appliance availability is up to 96%, which considering the rate of national virus spread is a strong position, but may possibly be a consequence of increased availability of RDS pumps, due to restrictions placed on the normal primary employer work activity of crews.

In pre-planning for a reduction in operational response the SFRS has an Operations Control (OC) Resilience Strategy and an Appliance Withdrawal Strategy:

- OC Resilience Strategy – The SFRS has OCs located in the North, East, and West of Scotland. For the duration of the crisis each is treated as an island site to prevent the possibility of cross contamination. The SFRS has mitigation strategies to improve staffing, if required in OCs, including re-engagement and the re-allocation of staff roles where skills allow.

An OC's operational capability is predicated on maintaining a minimum staffing number in order to carry out essential duties. In pre-planning for a reduction in normal staffing the Service has a three tiered response, based on crisis escalation. The SFRS has successfully tested its planning assumptions to prove resilience at all of its OCs.

- Appliance Withdrawal Strategy – The SFRS has operational appliances at 356 Fire Stations across Scotland, some of which have multiple appliances. In order to pre-plan for a severe and prolonged staff reduction, it has categorised its pumping appliances into three priority bandings, which will drop off from operational response on a controlled basis. The SFRS is employing mitigation strategies in order to maintain appliance availability including reducing ridership factors from five to four Firefighters on a pump where practicable (this will be continuously reviewed), re-engagement of those operational staff recently retired and the re-allocation of staff roles where skills allow.

In order to carry out a phased reduction effectively the SFRS has produced a four tiered reduction in response based on crisis escalation, Tier 1 (100% - 96%), Tier 2 (95% - 80%), Tier 3 (80% - 60%) and Tier 4 (60% and below). At the time of writing, the SFRS is operating comfortably in Tier 2.

Should the Tier 3 level of attrition be reached the SFRS will introduce a temporary response reduction, according to incident type. Local officers are liaising with stakeholders as to what this reduction will look like in order to inform their risk assessments.

As the SFRS capacity diminishes it will undoubtedly have an impact on its ability to support large concurrent events. In consideration of this, the SFRS National Event Concurrency Risk Matrix has been reviewed and updated to fully assess reasonably foreseeable events, weighted against current mitigation policies, procedures and protocols utilising Reasonable Worst-Case Scenario (RWCS) of the effects of COVID-19.

We challenged senior managers in the SFRS on the evidence presented, to ensure the delivery of an effective operational response and were given assurances that the comprehensive planning and procedures produced are suitable and sufficient.

### **3.2.1 Training and Operational Competence**

It is safe to say that mitigation strategies to limit the exposure to and spreading of COVID-19, will impact on training courses and training opportunities thus affecting competence levels of staff.

It is reported that all non-essential training has been cancelled and that risk critical training will go ahead based on a risk/benefit analysis.

Retained Duty System (RDS) training nights have been cancelled for a three week period, albeit staff will still be paid.

We feel that this is entirely appropriate in support of the Government strategy for social distancing, but feel that competence levels will have to be closely monitored, in order to reduce the likelihood of skills decay down to unacceptable levels. We are particularly concerned about the effects on RDS Firefighters who, as reported in our review of RDS Training are, under normal circumstances, severely limited in their ability to train for operational competence.

### **3.2.2 Partnership Working**

The Civil Contingencies Act 2004 places a legal obligation upon emergency services and local authorities (defined as "Category 1 responders" under the Act) to assess the risk of, plan, and exercise for emergencies, as well as undertaking Business Continuity Management.

Historically, the SFRS has worked hard to build good relations with Regional (RRP) and Local Resilience Partners (LRP) (both category 1 and 2 responders) in order to work effectively and efficiently during difficult times. The SFRS, in its planning for a COVID-19 response is supporting these platforms at an appropriate level with DACOs attending RRP and LSOs attending LRP along with civil contingencies officers who add expertise and continuity to the process.

The Scottish Ambulance Service (SAS) in conjunction with all health sector workers is working incredibly hard in response to the demands of COVID-19. The SFRS is working closely with the SAS to mitigate any joint response issues with effective de-conflicting strategies working well to harmonise joint working in support of mutual aims and objectives.

The SFRS has recently reviewed the existing section 35 and 36 arrangements of the Fire (Scotland) Act 2005 for mutual aid and cross border assistance. The Service has a Memorandum of Understanding (MoU) with Northumberland and Cumbria Fire and Rescue Services and these are operating under 'business as usual' at present.

We consider these arrangements appropriate with the correct weight of authority and support to play an accountable and leading role in mitigating the effects of the crisis at a multi-agency platform.

### **3.2.3 Communication and Engagement**

The SFRS recognises the changing way that people are living their lives during the COVID-19 pandemic, most particularly during the current lock-down. This change has resulted in a change in risk profile for communities. The SFRS is responding to this change through a targeted community engagement strategy focusing on supporting the public, relevant premises duty holders and partners.

#### **a. Community Safety Engagement**

- The SFRS has halted its Home Fire Safety Visit (HFSV) programme to prevent transmission of COVID 19, the Service is developing digital HFSV checklists
- In response to the lock-down the SFRS has developed COVID-19 specific home fire safety messaging, launching a TV advertising campaign on 28 March, running to 12 April. This includes a focus on five key elements; cooking, smoking, smoke and heat alarms, electrical safety and establishing a night time routine. Each of these messages is supported by specific social media campaigns
- The SFRS is also developing awareness campaigns to target emerging issues such as the accumulation of combustible materials. This message is also expanded to duty holders in non-domestic premises concerning the storage of goods and materials safely.

#### **b. Fire Safety Enforcement**

- The SFRS has ceased its routine fire safety audits although it is still has a response to high risk issues and complaints
- To support those vulnerable in the community during this difficult time, the Service is working with the relevant partners including the Care Inspectorate (CI) and Health Facilities Scotland (HFS)
- For both the CI and HFS, the way it operates within its MoU has been reviewed. It has developed Joint Working Agreements to support the streamlining of processes to open new facilities
- The Service has circulated guidance to its LSO areas, to engage with the duty holders for non-domestic premises regarding issues such as reviewing their Fire Risk Assessment (FRA), in light of any COVID-19 related changes and the safe storage of stock or materials.

c. Youth Volunteer Scheme

Youth Volunteer Schemes are a valued part of the SFRS. To ensure the continued engagement with these groups a digital strategy for communication is being developed. All training content is being reviewed with a view to supporting online delivery. Webinars for Youth Volunteers are being considered as part of this review.

d. Unwanted Fire Alarm Signals (UFAS) - The Service is reviewing its UFAS policy.

It is also reported that the Service has a process in place, which includes the consideration of requests for assistance from communities and partners. We would hope that there will be a consistent approach to all LSO areas of the Service

HMFSI is content that the SFRS is reportedly addressing the fact that people's lives may have significantly changed during this lockdown phase of the COVID-19 pandemic and is taking steps to mitigate associated factors and that these are suitable and sufficient.

### **3.3 Critical Support Functions**

#### **3.3.1 Procurement**

In line with the majority of organisations the SFRS has introduced homeworking for its non-operational staff where this is possible, which is reported to be operating well, with ICT structures coping with versatility and demand. The procurement department is reported to be operating efficiently under these constraints with no noticeable slow down or loss of normal provision.

There is however, concern over the ability to procure disposable PPE items such as latex gloves, disposable aprons and face masks following a NHS England communication to suppliers of these products to only supply the NHS. To mitigate this in the short term, the SFRS has alerted staff to use PPE appropriately as at present they have a finite stock. This issue has been escalated, see detail in risks and issues below.

#### **3.3.2 Appliance and Equipment Testing and Maintenance**

As is to be reasonably expected, a reduction in staff will cause a reduction in output or service. This will manifest in different ways depending on the issues at hand. The SFRS has reported that internally its fleet and equipment function is operating at normal levels with no noticeable reduction in output at this time. This will be monitored and contingency plans put in place as and when required.

Although RDS training nights are cancelled for three weeks, staff have been given authority to carry out critical maintenance which will include local based equipment inspection, testing and maintenance which will ensure, if carried out appropriately, that equipment remains ready for operational use.

An area of concern for the Service is the continual compliance with legislation such as the Lifting Operations and Lifting Equipment Regulations 1998 (LOLER). The Health and Safety Executive (HSE) is not currently relaxing regulations during the crisis. Legislation requires the equipment to be tested against a standard by a specialist in a certain field. If the availability of specialist equipment inspectors' becomes compromised, it will become difficult to comply with current inspection regimes. The SFRS will have to carry out a risk based analysis when a piece of equipment falls outwith compliance as to whether or not it can remain in service. Further detail is noted in risks and issues below.

HMFSI is content that critical support functions within the SFRS are reported to be working well and we are given assurances that contingency planning is suitable and sufficient.

#### **4. Risks and Issues Reported**

1. The availability of disposable Personal Protective Equipment (PPE) is a concern following on from NHS England communications to suppliers that they should supply the NHS only. This has been raised internally within the SFRS to the SFRS Gold Command Group. The SFRS is in close co-ordination with the Scottish Government over PPE and a collaborative PPE subgroup has been established to look at requirements across the emergency services in order to collaboratively procure additional appropriate PPE, in accordance with EU procurement directives. The SFRS is also looking at cleaning and maintenance requirements for structural fire kit and breathing apparatus. The SFRS has also established a PPE and Policy Sub Group as part of its actions in support of the response to COVID-19. It has also established a Community Resilience Assistance Group to liaise with Local Resilience Partnerships to consider local needs and feedback, to support national delivery.
2. The Health and Safety Executive (HSE) is not currently relaxing regulations, specifically regarding; Lifting Operations and Lifting Equipment Regulations (LOLER). This is impacting upon the 'safe working at height' and 'rope and rescue operational response'. This has been raised internally within the SFRS to the Gold Command Team. The objective of the LOLER regulations is to make working life safer for all workers who come into contact with lifting equipment. The HSE has also not made a relaxation of the HSE Display Screen Equipment Regulations (DSE). The DSE regulations place specific requirements on employers with the aim of protecting workers from the health risks associated with DSE. Concerns regarding the LOLER and DSE Regulations are being carefully monitored by officials and they have been raised strategically within the Scottish Government, coordinated via the Safer Communities and Justice Division Hub and are being fed into SGoRR.

3. Childcare provision for critical workers remains a concern, as some Local Authorities have not given clarity yet as to critical workers. This has been raised internally within the SFRS to the Gold Command Team. The SFRS is not reporting any significant impact on the availability of firefighters caused by the closure of schools, despite the childcare provisions not being extended beyond NHS staff in many Local Authority areas. However, the situation is being monitored and raised within the Scottish Government, with coordination via the Safer Communities and Justice Division Hub and fed into SGoRR.

## 5. Conclusions

A desktop review of documentation, subsequent supporting evidence and Skype interviews carried out with SFRS senior managers, on preparedness for a COVID-19 response has been undertaken, to provide assurance to the Director for Safer Communities on behalf of the SG.

The review concentrated on three specific areas; Governance, Operational Service Delivery and Critical Support Functions to ensure the Service maintained its Operational effectiveness during a difficult period of uncertainty that has the potential to last for an extended period.

**HM Fire Service Inspectorate believes there is good evidence to support the SFRS's strategic planning assumptions and the necessary mitigation that will enable the Service to deliver its statutory duties.**

This evidence is summarised in the key findings below:

- We recognise that there has been a significant amount of work undertaken to consider the wider implications to the SFRS and the communities it serves during the COVID-19 pandemic. This has resulted in a robust planning process that has involved the SG, Civil Contingency partners, key stakeholders and other agencies.
- We believe the SFRS has identified the most appropriate risks associated with COVID-19 that could have a detrimental impact on its operational planning assumptions and Service Delivery.
- In the creation of a suite of supporting documentation including, policies and procedures the SFRS has put the necessary mitigation in place to reduce the risks identified to an acceptable and manageable level.
- There is a robust governance structure, including regular updates and briefings provided through a comprehensive reporting protocol to all stakeholders and staff on the Service's COVID-19 operational and resilience preparedness.
- It is evident that planning has also taken place to reduce the potential risk to critical support functions and how they impact on Service Delivery.

- Consideration has been given to an important and targeted Community Safety Strategy, recognising that people's lifestyles and workplaces may have materially changed during this period of lockdown.
- Ongoing risks and issues are logged and taken forward by SFRS Gold Commanders through various platforms for multi-agency consideration and ultimately Scottish Government assistance where required.

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