

**HM FIRE SERVICE INSPECTORATE IN SCOTLAND**  
**THE CHIEF INSPECTOR'S PLAN 2022-25**



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We aim to deliver our programme in line with our core values of

# Integrity, Objectivity, and Fairness.

The Chief Inspector's three year Plan (the Plan) outlines how HM Fire Service Inspectorate in Scotland (HMFSI) will meet its statutory purpose to inquire into the efficiency and effectiveness of the Scottish Fire and Rescue Service (SFRS) to assist in its continuous improvement.

This Plan describes the role and function of the Inspectorate, along with our strategy and priorities for the inspection of the SFRS.

The Plan has been prepared to meet the requirements of section 43F of the Fire (Scotland) Act 2005 (the Act), which is reproduced at the back of this document.

The Plan contains information on priorities for inquiries to be carried out by Inspectors, and details how these will be conducted, in a proportionate, accountable and transparent manner.

Each year HMFSI identify a number of specific areas of business that have been risk-assessed as being particularly significant. These form the basis for our programme of Thematic inspections.

In addition to our Thematic inspections we seek to assure the public, and Scottish Ministers, that SFRS is performing in an efficient and effective manner and is working effectively with local authorities and strategic partners.

To provide this level of assurance we have, since 2014, undertaken a rolling programme of inspections of fire and rescue service delivery across Scotland's 32 local authorities areas.

Whilst this Local Area Inspection (LAI) approach has provided a valuable insight into SFRS arrangements at a local authority level, it is a resource intensive process and the results of inspections can at times appear repetitive.

With this in mind we have taken the decision to introduce a new style of inspection that will consider performance across an entire Service Delivery Area (SDA) of the SFRS against a range of key themes.

Whilst this new SDA inspection approach will replace the LAI process, we will ensure that we maintain our focus on arrangements for ensuring suitable local service delivery. Further detail with regard to this new approach can be found within this Plan.

In addition, the Inspectorate may from time to time respond to investigate unplanned events under the description of 'significant incidents' or otherwise. These can be either self-directed or where Scottish Ministers have directed the Chief Inspector to carry out such an inquiry.

HMFSI will keep this Chief Inspector's Plan under review and adapt it, as necessary, over the course of the three years' to meet any changing or pressing requirements identified or placed on the SFRS.

We have consulted with our key partners regarding this Plan and, will further consult should any changes during the course of the three years' be proposed.

HMFSI is committed in delivering against its statutory purpose, as defined by the Act, and looks forward to supporting the SFRS as it goes about its duty of protecting the communities of Scotland and continuing on its transformation journey.

## COVID-19 PANDEMIC

This Plan cannot be presented without acknowledging the challenging and unprecedented times that have resulted from the Covid-19 pandemic.

The restrictions imposed across the country in a bid to minimise risk, made it very challenging to carry out our functions in a traditional manner. As such, as has been the case across many other organisations, we have had to adapt and introduce new ways of working to reduce travel and physical contact. Whilst this has had an impact on our planned programme of events, we have also learned to operate in a manner that can at times improve efficiency and reduce cost. We will ensure that this is considered in all future inspection activities and lessons learned are used to improve performance.

Whilst the Chief Inspector's Plan 2022-2025 sets out our intent, we recognise that we may need to further adapt areas of inspection throughout the period of the document.

In accepting the possibility of slippage to our programme, we remain committed to delivering this three year Plan to fulfil our statutory duty and to support the SFRS in its journey of continuous improvement..



**Robert D Scott QFSM**

HM Chief Inspector of the  
Scottish Fire and Rescue Service





## Our purpose

HM Fire Service Inspectorate in Scotland (HMFSI) exists to provide independent, risk-based and proportionate professional inspection of the SFRS. Its purpose is to give assurance to the public and to Scottish Ministers that the SFRS is working in an efficient and effective way, and to promote continuous improvement. We also provide independent, professional advice to Scottish Ministers and have functions in relation to non-domestic fire safety.

The statutory basis for the Inspectorate is derived from sections 43A to 43G of the Act. HM Chief Inspector is appointed by an Order in Council and operates independently of Scottish Ministers and the SFRS. Assistant Inspectors are appointed under Ministerial powers contained in the Act, and are equally expected to act independently.

We have a statutory duty to co-operate and co-ordinate with the Auditor General. We also work with other Inspectorates and agencies across the public sector to share specific expertise and contribute to shared outcomes. We co-ordinate our activities to reduce the burden of inspection and avoid unnecessary duplication.

The SFRS is the UK's largest fire and rescue service and one of the largest of its kind in the world. The Service was formed on 1 April 2013 when the eight legacy services that had existed in Scotland since 1975 were amalgamated. The SFRS has 357 fire stations. Approximately 79%<sup>1</sup> of these are crewed predominately by firefighters working either the Retained or Volunteer Duty Systems [RVDS]. The remaining 21% are Wholetime crewed (this includes 23 Wholetime fire stations which also have a Retained capability). As at 31 August 2021 the SFRS had a total workforce of 7,831; of these 3,584 are Wholetime firefighters with 2,872 RVDS firefighters making up the next largest group.

The legislation that led to the creation of the SFRS, the **Police and Fire Reform [Scotland] Act 2012**, also enabled the change to the scrutiny role of HMFSI to provide independent, risk-based and proportionate professional inspection of the SFRS. Unlike the equivalent organisation for England, HM Inspectorate of Constabulary and Fire and Rescue Services [HMICFRS], HMFSI has an exclusive focus on fire service matters in Scotland. There is a separate scrutiny body for police matters, HM Inspectorate for Constabulary in Scotland [HMICS].

<sup>1</sup> Source: "Fire Station Dataset" found at <https://www.firescotland.gov.uk/about-us/who-we-are/statistics>

Since its formation, the SFRS has made significant progress in the harmonisation of working practices, policies and staff terms and conditions and this work is continuing. However, progress in relation to the next phase of transformation is being affected by continuing UK national discussions between employers and employee representative bodies regarding any expansion

of the role of firefighters. HMFSI will continue to support the Service and Scottish Government, and will offer independent advice and scrutiny relative to transformation, as well as continuing with our programme of Thematic inspections and introducing our new Service Delivery Area Inspection regime.



### Inspectorate Establishment

The Inspectorate team is made up of the Chief Inspector, four Assistant Inspectors, one Inspection Manager and two Administrative Staff.

In addition to this core team of eight staff, HMFSI offers opportunities for members of SFRS to join the Inspectorate on secondment. On occasions, the Inspectorate calls upon subject matter experts to assist in Thematic reviews.

### Budget

HMFSI's budget allocation is determined by Scottish Government. HMFSI also uses IT, Procurement and HR functions of the Scottish Government. As the main function of the Inspectorate is the scrutiny of the SFRS, our spend is based around providing the appropriate staffing and other resources needed to facilitate the inspections set out in our Inspection Plan. Our staffing roles are filled by both full-time and part-time workers. Under normal operating conditions the budget is usually split on an 80:20 basis [staff/running costs].

### Values

Our stated values are:

#### Integrity, Objectivity and Fairness.

- **Integrity** – putting the obligations of public service above the personal interests of inspections;
- **Objectivity** – basing our inspection conclusions and recommendations on rigorous, unbiased analysis of evidence;
- **Fairness** – in conducting our inspections, when interacting with members of the SFRS and relevant stakeholders, we do so in a way that would be considered reasonable and will not impose an unwarranted burden or adversely affect individuals.

In addition to our **Values**, our guiding principles are that our inspection work is proportionate, accountable and transparent. We will always act independently and publish impartial and objective reports. We will be accountable for what we do and will justify our actions and reports by evidence. We will ensure our scrutiny is proportionate and that, we only inspect what is necessary to achieve our statutory purpose.

**Our guiding principles are that our inspection work is proportionate, accountable and transparent.**

## How the inspections are carried out

Under section 43F of the 2005 Act, the Chief Inspector must prepare a Plan setting out:

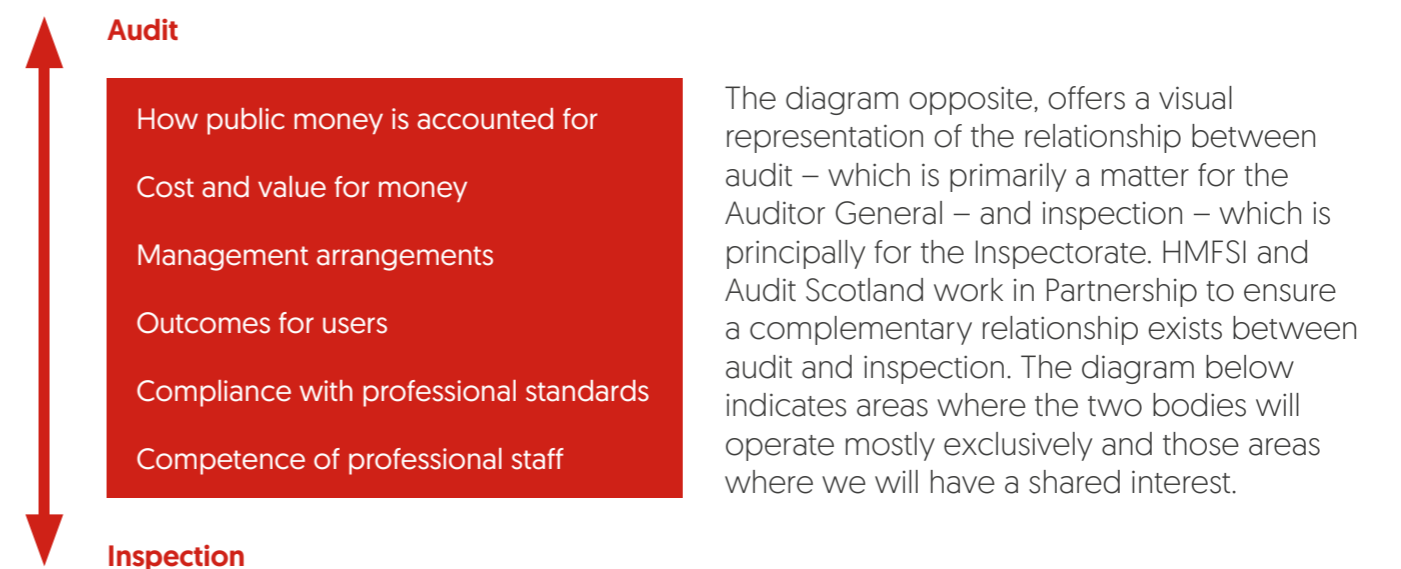
- (a) priorities for inquiries to be carried out; and
- (b) information on how inquiries will be carried out in a way which is proportionate, accountable and transparent.

In line with that requirement, our Chief Inspector's Plan outlines our intended priorities and scrutiny activities for the 2022-25 period. The Plan was developed through discussion with the SFRS, other scrutiny bodies, targeted stakeholder engagement, and on our previously identified areas of interest, including our knowledge of issues identified through our existing inspection programme.

We will keep this Plan under review and make such changes as we determine necessary to enable us to both respond to risk and discharge our statutory obligations.

As mentioned above in the **Our Purpose** section, there is a complementary relationship between the Inspectorate and the Auditor General [supported by a Memorandum of Understanding with Audit Scotland], and with other Inspectorates and agencies across the public sector to share specific expertise or, where appropriate, jointly examine important areas where the SFRS works in partnership and contributes to shared outcomes.

Both organisations are members of the Strategic Scrutiny Group [SSG] which is chaired by the Accounts Commission. The SSG is comprised of Scotland's main public sector scrutiny bodies, and seeks to support the delivery of better coordinated, more proportionate and risk-based scrutiny, predominately at a local authority level.



<b>Audit Scotland on behalf of the Auditor General for Scotland and the Accounts Commission</b>	<b>Areas of shared interest</b>	<b>Her Majesty's Chief Inspector of the Scottish Fire and Rescue Service</b>
Financial audit	Proportionate and risk-based best value audit and inspection activity covering:	Operational inspection, including:
Value for money	Outcomes	Policies and practices
Performance audit	Service performance	Operational guidance
	Continuous improvement	Safety
	Partnership working	Staff learning and development
	Performance management	Legislative fire safety enforcement
	Use of resources	Community safety engagement
	Governance and accountability	
	Community planning	



## Inspection process

As has been the case for a number of years, we use the Scottish Fire and Rescue Framework, as a guide to how we measure the effectiveness of the Service. The Framework has recently been revised and the 2022 edition will continue to guide our approach to inspection.

The Framework defines priorities for the Service covering the following specific areas.

- Prevention
- Response
- Innovation and Modernisation
- Climate Change
- Effective Governance and Performance
- People
- Partnership

The Chief Inspector gives as much notice of an inspection as is reasonably practicable to the SFRS. From time to time the Inspectorate may carry out unannounced visits as part of an inspection programme. The Inspectorate has an agreed communication and feedback protocol with the SFRS which sets out how we take feedback into consideration.

When we conduct our inspection activity, the SFRS must provide us with such assistance and co-operation as we may require to carry out our functions, and must comply with any reasonable request that we make. When we publish a report, the SFRS must give consideration to the findings and take such measures, if any, as it thinks fit.

## Local Area inspections

The 2005 Act requires the SFRS to appoint a Local Senior Officer (LSO) and develop a Local Plan for each local authority area in Scotland. The Local Fire and Rescue Plan sets out the SFRS's priorities and objectives for that local area. Inspections of the SFRS service delivery within local authority areas aim to examine the development and delivery of Local Fire and Rescue Plans.

Since 2014, HMFSI has carried out a programme of inspections of the SFRS local service delivery across some of the local authority areas of Scotland.

These Local Area inspections have played a valuable part in ensuring that the SFRS gives due consideration to both national and local needs when designing and developing systems of work.

Whilst this approach has provided a valuable insight into SFRS arrangements at a local authority level, it is a resource intensive process and results of inspections can at times appear somewhat repetitive.

Between 2014 and 2022 HMFSI has carried out a total of 16 LAI's, an average of 2 inspections per year. Given there are 32 local authorities in Scotland, it would seem likely that it would take around 16 years to complete this programme, and provide comfort that arrangements across the entire country are fit for purpose.

With this in mind, we have taken the decision to review our current arrangements and to move to a new style of inspection that considers performance over a larger area against a range of key themes. Whilst our approach will change we will maintain our focus on arrangements for ensuring suitable local service delivery.

All LAI reports carried out to date are published on our website and can be viewed at <https://www.gov.scot/collections/hm-fire-service-inspectorate-in-scotland-reports/>

## Local Area inspections undertaken to date

1. Aberdeen City
2. Dundee City
3. East Renfrewshire
4. Na h'Eileanan Siar
5. Glasgow City
6. Moray
7. Scottish Borders
8. South Ayrshire
9. West Lothian
10. Highland
11. North Lanarkshire
12. Dumfries and Galloway
13. Edinburgh City
14. Midlothian
15. Argyll & Bute
16. Angus





## Service Delivery Area inspections

SFRS currently operates across 3 Service Delivery Areas (SDA). Each SDA (East, West and North) is managed by a Head of Service Delivery. These Heads of Service Delivery each has direct responsibility for a number of Local Senior Officers (LSO). LSOs in turn manage a team and oversee activities across Scotland's operational fire stations.

The LSOs have direct responsibility for engaging with local authority partners, and other relevant stakeholders to ensure SFRS plays an active role in the Community Planning process. Local authorities also have responsibility for scrutinising performance and holding LSOs to account through appropriate scrutiny arrangements.

It will therefore remain vitally important that we continue to consider the systems in place for ensuring this vital local connection is fit for purpose and that local authorities, and other partners, are satisfied with the service provided by LSOs and by SFRS.

Our new Inspection process will consider performance across the SDA, and across each LSO area within that SDA, against 4 key themes.

- Prevention
- Response
- People
- Partnership

We will measure performance under each theme against a range of indicators, and will aim to identify areas of good practice and areas for improvement across this much wider geographical area. We aim to do this without losing focus on the need for local engagement in the design of delivery systems.

The move from the LAI to the SDAI approach will mean that we can provide assurance that the SFRS is delivering an efficient and effective service across the entire country.

The move to a three year rolling programme of inspections will allow us to ensure that our assessment of suitability remains current and fit for purpose, as well as confirming that the Service is making best use of available resources.



## Thematic inspections

Our Thematic inspections are an examination of a particular service-wide theme, and generally seek to understand how the Service as a whole is managing the subject under scrutiny. The inspection reports are laid before the Scottish Parliament.

The SFRS has an internal process for considering our reports, and their recommendations or observations. Officers of the Service compile an action plan for each report we produce, and these action plans are submitted to either the Audit and Risk Assurance Committee or the Service Delivery Committee of the SFRS Board for consideration and scrutiny.

The Chief Inspector is invited to attend and contribute to specific agenda items at both of these committees thus providing the Inspectorate with oversight of progress and assurance that recommendations have been considered and relevant action taken.

All inspection reports are published on our website and can be viewed at: <https://www.gov.scot/collections/hm-fire-service-inspectorate-in-scotland-reports/>

Figures 1 and 2 show the elements we consider in arriving at the themes for our forthcoming thematic inspections which we may conduct during the lifespan of this Plan.

Figure 1: Safe Firefighter Concept



Figure 2: Governance



## Planned inspection activity 2022-23

Due to the significant impact of Covid-19 restrictions in 2021-22, our programme of inspection and our work was unavoidably delayed. As a consequence two of our Thematic inspections, planned to conclude in 2021-22, have been carried over to 2022-23. We anticipate that both of these inspection reports will be laid before Parliament in the first quarter of this year, and as such, will have minimal impact on other planned activities for the year ahead.



### Service Delivery Area Inspection

In line with our planned move to an SDA level approach, we plan on carrying out a thorough inspection of activity against key themes in one SDA each year. The schedule of inspections for the lifespan of this three year Plan is shown in Table 1 below.

Table 1

2022-23	East SDA
2023-24	West SDA
2024-25	North SDA

### Thematic inspections

As indicated above two of the Thematic inspections planned for 2021-22 have been unavoidably delayed. Schedules for publication of these, and other Thematic inspections planned for 2022-23 are set out in the table below.

Table 2

Health and Safety – An Operational Focus	Expected Publication April 2022
Firefighting in High Rise Buildings	Expected Publication June 2022
Mental Health and Well-being	Expected Publication March 2023
Operational Impact of Climate Change	Expected Publication March 2023

## Our Activity 2022-23

### Health and Safety – An Operational Focus

The aim of this inspection was to look at the organisational culture towards Health, Safety and Welfare, whether Health and Safety is centred on firefighter safety and that operational staff understand, and can demonstrate, how the 'firefighter safety maxim' is being applied in the SFRS. The inspection team also considered how the Service is using national learning, data and other information to reduce risk and improve the overall safety and welfare of its staff.

The team looked at governance and management, policy and planning, training and recording arrangements.

### Firefighting in High Rise Buildings

We commenced a thematic inspection into firefighting in high rise buildings in 2021. The inspection is considering how the Scottish Fire and Rescue Service prepares for and carries out this function. Aspects of this work which were considered as part of the inspection included:

- pre-planning and information gathering;
- operational procedures;
- training and awareness of staff;
- Operations Control procedures, including fire survival guidance;
- building checks and familiarisation visits by the Service;

- how the SFRS dealt with or is dealing with the recommendations from the Phase 1 Report of the Grenfell Inquiry; and
- how the SFRS is adapting to developments in high rise fire safety.

Inspection work has been ongoing during the year, and in line with other workstreams, Covid-19 restrictions have had an impact.

The work undertaken has included requesting and considering evidence from the Service, attending live play exercises, and field work visits to seven different local authority areas where we have examined some high rise inspection work, examined risk information and spoken with different categories of staff.

### Mental Health and Well-being

There are many factors that can lead to issues of mental ill health. Problems of a financial nature, personal or family matters, relationship breakdowns or any number of other external issues can have an effect on our health and well-being and can have a negative impact on mental health.

Working within a frontline emergency service can of course be stressful and exposure to traumatic events can also have an adverse impact on the mental health and well-being of some staff.

The SFRS, as a responsible employer, is sighted on this issue and has recently published a Mental Health Strategy and given a commitment to support its staff and to provide a positive and inclusive culture for them to operate within.

We will give consideration to this issue and reflect on the appropriateness of current arrangements to support staff and reduce instances of mental ill health. We will consider the culture across a range of workplaces including fire stations, offices, control rooms and workshops to better understand and identify any barriers that may exist to achieve this desired open and inclusive approach.

We will examine available detail relative to mental ill health and speak to those directly involved in implementing change and improvement to understand the progress that has been made, and the journey ahead, with regard to mental health and well-being.

### Operational Impact of Climate Change

The effects of climate change are of significant interest to governments and communities across the globe. The impact of weather related emergencies has been in the public eye for many years. News coverage of wildfires, flooding and the effects of water causing landslides and coastal erosion have become regular features for media outlets around the world.

The COP26 Climate Change Conference, held in Scotland in 2021, brought world leaders and experts to Glasgow to debate and discuss the impact, future approaches and develop potential agreements to tackle worldwide climate change.

The impact that weather-related incidents are having on the SFRS emergency response profile is already recognised by the Service. The number and scale of incidents that fall into this category is increasing in volume, and severity. The ability to predict these events, and the release of safety-related information to communities, will require organisations to develop greater data sharing arrangements and deliver a response plan with agreed priorities. This will affect the preparation, planning, exercising, equipment and training needed to respond.

We therefore plan on examining, how the Service seeks to understand, prepares for and delivers emergency response to incidents that can be classified as climate/weather-related events. Examples of such events might include wildfires, flooding and flood water, landslides and the impacts of storms and high winds. We will aim to identify any arrangements in place for forecasting any rise in activity levels that may be foreseeable and to understand how the Service will evolve to ensure it provides an adequate response to such events.

## Potential future activity up to 2025

The thematic activity which we shall undertake beyond 2022-23 during the course of this Plan, will depend on the issues that influence our inspection work but may include some of the following areas of interest:

- climate change and Service's actions relative to reducing its carbon footprint;
- the Service's planning and preparations for a response to a Marauding Terrorist Act;
- the state of the provision of specialist resources (specialist appliances, equipment and staff, including training);
- recognising and embedding organisational learning;
- National Resilience assets – provision, location, skills and usage;
- fire cover – distribution, modelling and standards;
- HR/workforce planning – recruitment, attrition, diversity and skills (all duty systems); support to LSO areas;
- administration and use of technology;
- Operations Control;
- RVDS duty system.



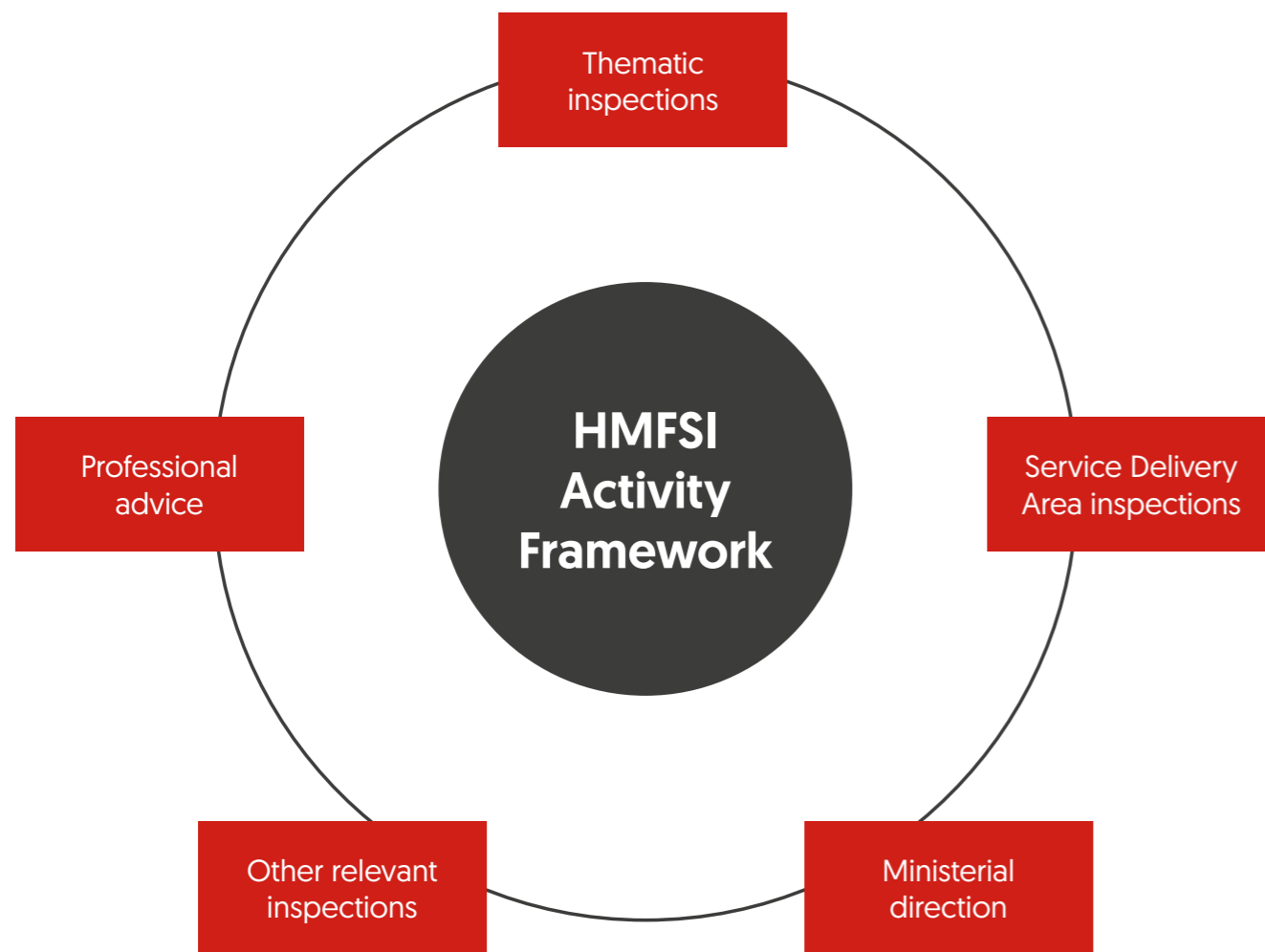
## Significant Incidents and Unplanned Events

We have written a policy outlining our approach to conducting an inquiry into a significant incident, that is, an incident the circumstances or outcomes of which are likely to attract public interest or concern. Generally speaking, we will not commence an inquiry into a significant incident where this would substantially duplicate work being done by other bodies. We reserve the right, however, to undertake our own inquiry where this would bring benefits that would not be realised by other investigations. We will always consult with bodies holding statutory responsibility for investigating the circumstances, before deciding to carry out a significant incident inquiry.

From time to time, the Inspectorate expects to respond to unplanned events whether under the description of 'significant incident' or otherwise (this may include instances where Scottish Ministers direct the Chief Inspector to carry out an inquiry). The Inspectorate may be in a position to deal with such an inquiry with existing staff and resources, or may need to take on additional support for the duration of the work. In any case, the staffing and work of the Inspectorate is intended to be sufficiently flexible to allow for an appropriate response.



The diagram below illustrates the activity framework covered by HMFSI through its inspection programme.



## Equality

The Inspectorate's scrutiny role includes the performance of the SFRS in relation to equal opportunities. The Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012 set out the requirement for certain public bodies, including the SFRS, to take steps to mainstream equality across all of its functional areas. The Equality and Human Rights Commission is the body responsible for scrutinising overall compliance with equality legislation. Nevertheless, the Inspectorate will take an interest in relevant equality issues within the function under inspection and consider the extent to which any associated equality obligations have been met.

In addition, the Inspectorate has equality responsibilities of its own. We are committed to ensuring that equality issues are considered across all of our activities, including corporate decision-making, the accessibility of materials, the accessibility of the Inspectorate as part of the requirement for service user involvement, the workplace culture of the unit, the decisions we make in relation to inspection activity and by assessing the performance of the SFRS in meeting the needs of the communities served.

## Excerpts from the Fire (Scotland) Act 2005 as amended

### 43B Inquiries by Inspectors

- [1] An Inspector may inquire into a matter mentioned in subsection [3].
- [2] If directed to do so by the Scottish Ministers, an Inspector must inquire into a matter mentioned in subsection [3].
- [3] The matters are—
  - [a] the state and efficiency of SFRS,
  - [b] whether in carrying out its functions SFRS is complying with its duty under section 39A to make arrangements which secure best value,
  - [c] the manner in which SFRS is carrying out any of its functions.
- [4] In carrying out an inquiry under this section an Inspector may—
  - [a] require SFRS to provide any information or documents relating to the functions of SFRS that the Inspector may require,
  - [b] enter and inspect any premises which are used by SFRS,
  - [c] inspect any equipment which is used by SFRS.
- [5] If an Inspector exercises a power of entry by virtue of subsection [4](b), the Inspector may—
  - [a] take onto the premises
    - [i] such other persons, and
    - [ii] such equipment,as the Inspector considers necessary,
  - [b] require any person present on the premises to provide the Inspector with any information or documents that the Inspector may reasonably request.

- [6] An Inspector may not under subsection [4](b)—
  - [a] enter or inspect premises occupied as a private dwelling,
  - [b] enter premises by force.
- [7] SFRS must provide such facilities, assistance and co-operation as an Inspector may reasonably request for the purposes of, or in connection with, an inquiry under this section.

### 43F Chief Inspector's plan

- [1] The Chief Inspector must prepare a plan setting out—
  - [a] priorities for inquiries to be carried out by Inspectors, and
  - [b] information on how inquiries will be carried out in a way which is proportionate, accountable and transparent.
- [2] The Chief Inspector—
  - [a] must keep the plan under review, and
  - [b] may from time to time revise the plan.
- [3] The Chief Inspector must, in preparing a plan [and any revised plan], consult such persons as the Chief Inspector considers appropriate.
- [4] The Chief Inspector must publish the plan [and any revised plan] in such manner as the Chief Inspector thinks fit.



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ISBN: 978-1-910349-42-7

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PPDAS5622960 (03/22)