BOARD PAPER

Item Number	**Item 5 – Paper 2**
Title of Paper	**Impact Assessment**
Decision or Information	For decision
Date of Meeting	21st December 2022
Presented by	Fire Standards Team
Attachments	Appendix A – Engagement event programme Appendix B – List of services attending

Summary

In response to action FSB-A116 and Board discussions, work has been progressing to understand how standards have landed within services following their publication, and their impact. This paper provides the Board with further feedback following the three impact assessment engagement events held over the past six months.

It includes some key findings and recommendations for the Board to consider based on the feedback received from those who attended these events.

Recommendations

The Board is asked to review the contents of this paper, consider the findings and, if content, agree the recommendations listed below.

That communications and engagement with services from both the Board and other stakeholders to support Fire Standards becomes a primary focus in 2023. To support this more detailed recommendations include:

1. Revising our current engagement and communications plan including to:

    –   consider how best to engage with Chiefs and Chairs especially about support for Fire Standards Single Points of Contact (SPOCs) in services;

    –   identify opportunities for communicating jointly about Fire Standards with key stakeholders including the Home Office, HMICFRS, the NFCC, APCC and the LGA;

    –   revise key messages in our communications strategy based on impact assessment feedback;

    –   consider further engagement events with services; and

    –   consider multiple channels of communication including service visits, workshops (in-person and online), direct emails, attendance at sector conferences, editorial

articles, providing content for local communication teams to use to promote Fire Standards.

2. Complete the mapping exercising of the recently released HMICFRS "good" statements against Fire Standards to clarify the links between standards and inspections.

3. Consider an online impact assessment survey distributed to those services which did not have any representatives at one of the workshop events.

4. Carry out more in-depth analysis of the feedback received to identify potential further actions and respond to individual comments, if required.

Background

Engagement Events

As discussed over the past few months, the Fire Standards Team is focussed on understanding how the published Fire Standards have been received by services and their initial impact.

The team is doing this in liaison with the NFCC Implementation Team and other NFCC personnel.

At the time of these workshop events, 12 Fire Standards had been published since early 2021 with the latest, Data Management, published in July 2022.

Three engagement events were arranged, led by the Chairs and facilitated by the Fire Standards Team with members of the NFCC Implementation Team also attending. The approach at the second two events was revised slightly following consideration of how the initial event in July went. The programme for the second two events is at Appendix A.

These events gave those attending from different services the opportunity to share their experiences and views about how the Fire Standards had landed and the impact of them generally. They also provided an opportunity for attendees to discuss how they are utilising the implementation tools and their various approaches to implementation.

The general feedback from each of the events was that attendees found them productive, especially because they were in-person rather than online meetings. Many expressed that the ability to discuss concerns or share views with the FSB Chairs, the NFCC team members and each other was hugely beneficial. This was evident from the level of engagement on each day and the appreciation voiced by all those who attended. They proposed that further events of this type should be considered by the Board.

Attendance

The events were well supported with **33 services** attending in total, including Defence Fire and Rescue which operates within the MOD. This represents 73% of services in England sending representatives to one or more of the workshops. The full list of services attending can be found at Appendix B.

The Fire Standards Team are considering ways in which to engage those services who were not represented at the workshops to provide them with the opportunity to comment on how the standards have landed and been implemented in their service and their impact.

Single Points of Contact (SPOCs)

Attendees at the workshops were generally those who act as the Single Point of Contact (SPOC) for Fire Standards in their service and were a mix of middle to senior management.

An observation after all three events is that often the person designated to "implement standards" may not have a level of authority or influence within their service to drive change or direct others. This may either be the SPOC themselves or those responsible for the department or function to which a Fire Standard may relate.

To support this observation, there were multiple examples given by the SPOCs about what happens when they liaise with the relevant department head as the local "subject matter expert" when a Fire Standard is published. The SPOC will generally suggest a gap analysis is made of their service against the Fire Standard, offering the Implementation Tool to support. Often though, the SPOCs appear to be met with challenges from colleagues in terms of their capacity to complete a Fire Standard gap analysis and the perceived lack of importance of doing so in comparison to local priorities and other tasks, such as preparing for an inspectorate visit or responding to inspection recommendations.

The role of senior and political leaders is significant in ensuring that a service recognises the importance of the Fire Standards in improving their professionalism and service to the public they serve. Leaders need to clearly demonstrate their support for the standards overall and their local arrangements for how they will approach achieving them, including giving their SPOCs the support they need.

This is an area we feel needs further consideration and discussion with leaders. Potentially sharing some of the feedback included in this report, may be a useful start point for further discussions.

Feedback Analysis - General Observations

The feedback received at the three events has been collated and initial quantitative analysis completed.

The first area of feedback sought was to understand what impact the published Fire Standards had on services. Comments received were marked as either positive, neutral (comments that were neither positive nor negative) or negative. The total number of comments are shown as percentages below:

- positive impact 60%
- neutral 20%
- negative 20%

The team will be carrying out more in-depth analysis on the feedback in early 2023 especially those comments identified as negative.

Some examples of the comments received from services, both positive and negative, are quoted below:

Impact – Positive

❖ *Beneficial impacts of the standards are that they get the right people in the same room. This enables a better understanding of impacts across the service and provides a holistic view. Fire Standards are constantly on agendas within the service.*

❖ *Fire Standards are now everyone's responsibility. No longer individuals thinking "prevention is my area" - helping to remove silo-working across the sector. Improving conversation within services for example the Code of Ethics is across many areas; Operational Response Fire Standards affect many different depts.*

❖ *Fire Standards have made the organisation reflect more, bringing balance to the organisation's perspectives.*
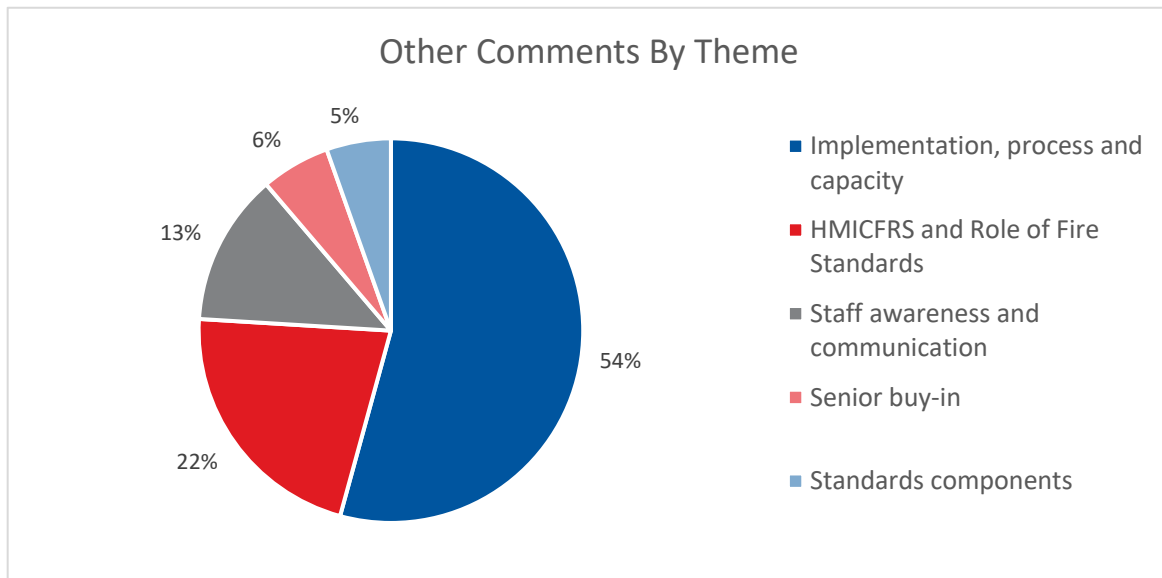
Impact – Negative

❖ *The Fire Standards are often treated as a compliance exercise only, which is a cultural issue within services.*

❖ *The pace of release is making prioritisation difficult - not helped by a current lack of internal governance, quality assurance. We have not got to grips with Fire Standards yet.*

❖ *These standards may compete against each other. If we had to guess where the SLT focus would be between "Leadership and People" and "Data Management", we think we would know the answer.*

Areas of Discussion

As mentioned above, the Fire Standards are generally seen as a positive step for the sector.

However, discussion at all three events led to feedback being received across a range of topics. These comments also contain a mix of positive and negative but for the purposes of this report and have been grouped by theme.

The chart below shows the range of themes which are discussed in more detail in the section "Summary of Findings".

Other Comments By Theme

- **Implementation, process and capacity** — 54%
- **HMICFRS and Role of Fire Standards** — 22%
- **Staff awareness and communication** — 13%
- **Senior buy-in** — 6%
- **Standards components** — 5%

The themes are a useful indication of where services' concerns lie, but analysis to date is limited to quantitative rather than qualitative with no weighting of importance or priority applied.

Not surprisingly, given the focus of the events there was a lot of discussion about implementation of standards and the local processes services deploy to do this. The next biggest area of discussion was in relation to the "role" of Fire Standards in comparison to legislation, the National Fire Framework, national guidance and local policies and procedures.

There seems considerable confusion or uncertainty particularly about the role of Fire Standards in relation to inspection raised at all three events.

Summary of Findings

Below is a summary of the key findings following the themes mentioned previously. This is followed by conclusions and recommendations for further action.

Implementation, Process and Capacity

- most services have identified a Single Point of Contact (SPOC) for Fire Standards and they tend to either lead or coordinate responses to Fire Standards consultations and then local implementation activity once a Fire Standard is published;
- where there is either no SPOC or one who is not well empowered, there appear to be more issues in terms of progressing implementation and more perceived barriers in the way of making progress;
- some services have a process in place for evaluating their current position against a newly published Fire Standard, a methodology for identifying gaps or areas for further improvement and governance processes that oversee this process;
- the implementation tools are seen as useful, although some specific feedback about structure and purpose was given, which the team will be considering for future Fire Standards;
- most services are not seeing the opportunities to connect their local organisational development or change work with work to achieve Fire Standards and work to address inspection recommendations. This can lead to a service having multiple action plans with the same overall intention of driving continuous improvement, creating confusion and potential duplication of effort for their people;
- most services mention a lack of capacity as a major barrier to achieving the Fire Standards and implementing any changes that are required as a result. This supports evidence collected in connection with past Fire Standards consultations; and
- some services feel the Fire Standards potentially stifle opportunities for local innovation whereas other services feel the Fire Standards could be more directive and specific.

Inspection and the Role of Fire Standards

- most services are not seeing a link between the Fire Standards and inspection judgement criteria leading to interpreting them as two separate measurement mechanisms;
- most services feel that the Fire Standards would have more validity if they were more clearly and explicitly referenced by HMICFRS;
- there is a perceived disconnect between HMICFRS and the Fire Standards Board which creates nervousness in services over whether the standards will be a measure of success in future inspections;
- most services are concerned about what appear to be differing levels of interpretation of Fire Standards by the cohort of HMICFRS inspectors;

- services are not always understanding that Fire Standards are not just about a paperwork compliance check;
- some services are focussing on gathering evidence and improving inspection grades rather than improving the service provided to the public and in turn their own organisation;
- some services recognise the opportunity the Fire Standards present to review how they operate and address any areas they may not have considered before or that have potentially been recognised through inspection;
- some services are not recognising that national guidance which underpins a Fire Standard is there to help services achieve the standard and following it should lead to consistency in service delivery and improved ways of working; and
- most services are not recognising that in fully achieving a Fire Standard outcome, they are more likely to see overall service improvements and then better inspection outcomes.

Staff Awareness and Communication

- uncertainty about the Government's White Paper and its implications are leading to a perception that Fire Standards may be replaced with something else in future leading to apprehension about working to achieve them;
- some services felt that their Governing bodies and local MPs would benefit from understanding more about Fire Standards enabling them to support their use locally and promote that to communities;
- levels of awareness about Fire Standards amongst staff within services is mixed, this appears dependant on the approach taken by the service in how they are approaching Fire Standards overall and their relevance locally;
- if a service has a SPOC who is positive about Fire Standards, has the right level of delegated authority and structures and internal governance to support them, it appears more progress is made with promoting Fire Standards within that service;
- some services would welcome tools and information to support local promotion of Fire Standards, for example, posters for use at stations, standardised wording that can be used on service intranets and for staff communications; and
- services welcomed the workshops as a way to clarify understanding, ask questions and share local approaches.

Senior Buy-In

- some services expressed concern over levels of support and understanding about Fire Standards at senior and middle management levels and by political leaders;
- some services feel that as there is no mandate to achieve the Fire Standards, they are not a priority for leaders who are primarily concerned with preparing for inspections and inspection outcomes rather than overall improvement;
- some services are potentially creating a lot of additional work and internal confusion by having multiple action plans for improvement rather than consolidating continuous improvement plans - thus improving capacity and better oversight;

- some services said that their senior leaders are supportive of Fire Standards in principle, but do not appear to understand the resources and holistic approach required to achieve them; and
- most services talked about competing demands influencing how services approach Fire Standards.

Standards Components

- some services are focussed mainly on the "*How to Achieve*" section of a Fire Standard. This has the tendency to lead to a compliance mentality, rather than considering the "*Desired Outcome"* of each Fire Standard which is the more important component and aligns better with the inspection approach, which focuses on outcomes;
- a few services felt the distinction between "Fire Standards" and "Guidance" was not clear;
- some services felt the clarity of language in some Fire Standards could be improved; and
- some services challenged some of the Fire Standards benefits and how they would be measured.

Implementation Support

To continue to support services, the Implementation Team have undertaken a series of online implementation workshops aimed at bringing services together to discuss and share their experiences of implementing Fire Standards, topic by topic. These have been incredibly popular and well attended.

The team continue to have regular dialogue with services, responding to requests for support with implementation of Fire Standards and providing feedback to the Fire Standards Team so that any issues or concerns can be addressed jointly.

In early discussions with the Board, an Impact Assessment Tool was discussed. We now feel the need for the tool as it was originally intended, has been superseded given the extent of feedback we have received in person through the engagement events. However, as has been proposed as part of ongoing communications and engagement, we will invite those services who were not represented at the events to provide their feedback via an online impact assessment survey.

Conclusions

The comments and observations were similar at all three events, although the last two events saw a broader range of feedback received.

It would appear there is more to do in providing clarity about the role of Fire Standards and their relationship with inspection. It would be more meaningful and potentially have more impact if a coordinated approach to communications was taken by all stakeholders who can influence improving the service to the public such as the Home Office, HMICFRS, the NFCC, the LGA and the APCC.

There remain concerns about how HMICFRS will refer to Fire Standards, not only in their inspection arrangements, but more generally when they speak about improvements and what services should or should not be doing to deliver better for the public.

This may be further complicated by the recent release of a series of "what does good look like" statements from HMICFRS ahead of their next round of inspection.

We believe these have the potential to cause further confusion amongst services as they consider what HMICFRS will look for and how to provide evidence for inspection. Some assurance from the HMICFRS team has been given that their statements align with Fire Standards.

The Chair raised this point with HMI Roy Wilsher and he agreed with her proposal that the Fire Standards Team should carry out a mapping exercise between the HMICFRS statements and the Fire Standards, to provide further guidance to services.

In addition, there appear to be opportunities to do more with leaders, both service and political, to improve levels of understanding about the Fire Standards and discuss the implications of them. In particular, the recognition that the forthcoming Leadership and People Fire Standards will require leaders who are more self-reflective and have greater self-awareness to lead the behaviour changes needed to see reform within services.

What is evident is that whatever we feel we have expressed either in direct communications through updates and newsletters or via the website, does not mean our intended messages have been heard clearly enough or been interpreted as intended.

The Chairs firmly believe that, as a result of the engagement events, clearly targeted communication will assist in clarifying misunderstandings and misconceptions about Fire Standards.

Recommendations

That communications and engagement with services from both the Board and other stakeholders to support Fire Standards becomes a primary focus in 2023. To support this more detailed recommendations include:

1. Revising our current engagement and communications plan including to:

   – consider how best to engage with Chiefs and Chairs especially about support for Fire Standards Single Points of Contact (SPOCs) in services;

   – identify opportunities for communicating jointly about Fire Standards with key stakeholders including the Home Office, HMICFRS, the NFCC, APCC and the LGA;

   – revise key messages in our communications strategy based on impact assessment feedback;

   – consider further engagement events with services; and

   – consider multiple channels of communication including service visits, workshops (in-person and online), direct emails, attendance at sector conferences, editorial articles, providing content for local communication teams to use to promote Fire Standards.

2. Complete the mapping exercising of the recently released HMICFRS "good" statements against Fire Standards to clarify the links between standards and inspections.

3. Consider an online impact assessment survey distributed to those services which did not have any representatives at one of the workshop events.

4. Carry out more in-depth analysis of the feedback received to identify potential further actions and respond to individual comments, if required.

APPENDIX A

Workshop Programme events Two and Three

Agenda

👤	**11:00**	**Welcome and Introduction's**
💼	**11:30**	**The Journey of the Fire Standards**
👥	**12:00**	**Impact Assessment Group Discussion #1**
🍽	**13:00**	**Lunch Break – 30 mins**
💬	**13:30**	**Impact Assessment Group Discussion #2**
🤝	**14:40**	**Thank You and Next Steps**

The questions posed in Group Discussion 1

1) What does your service do when a Fire Standard is published?
   a) Processes?
   b) Dedicated resources?
   c) Have the implementation tools helped?
2) Are there any challenges?

The questions posed in Group Discussion 2

1) What has changed in your service as a result of Fire Standards?
2) What have been the positive or negative consequences?

APPENDIX B

Attending Services

The table below shows those services who were represented at the three engagement events.

Event 1 – July London	Event 2 – October Manchester	Event 3 – November Salisbury
Cambridgeshire	Derbyshire	Avon
Cheshire	Durham & Darlington	Bedfordshire
Cumbria	Greater Manchester	Devon & Somerset
Defence Fire and Rescue (MOD)	Humberside	Dorset & Wiltshire
Devon and Somerset	Merseyside	Hampshire &IoW
Dorset and Wiltshire	North Yorkshire	West Midlands
East Sussex	Northamptonshire	West Sussex
Essex	Northumberland	
Hampshire and IOW	Nottinghamshire	
Kent	Shropshire	
Leicestershire	Tyne & Wear	
London	West Yorkshire	
Northamptonshire		
Nottinghamshire		
Oxfordshire		
Staffordshire		
Suffolk		
Surrey		
Warwickshire		
West Midlands		

The services who did not manage to attend include:

1. Buckinghamshire FRS
2. Cleveland FRS
3. Cornwall FRS
4. Gloucestershire FRS
5. Hereford and Worcestershire FRS
6. Hertfordshire FRS
7. Lancashire FRS*
8. Lincolnshire FRS
9. Norfolk FRS
10. Royal Berkshire FRS
11. South Yorkshire FRS

*It is worth nothing that the Chairs and members of the Fire Standards Team visited Lancashire FRS in the summer 2022. Feedback about the impact of Fire Standards formed part of those discussions which may indicate why a representative from Lancashire FRS did not attend an event. Many of the points raised during the visit matched the feedback we have received more widely. Further services visits are planned for 2023 as detailed in Paper 5.