

Item Number	Item 5 – Paper 2
Title of Paper	Response to <a href="#">HMICFRS's Misconduct Review</a>
Decision or Information	For discussion and decision
Date of Meeting	3 <sup>rd</sup> April 2025
Presented by	Fire Standards Team

## Summary

This paper provides the response of the Fire Standards team to the HMICFRS's Misconduct Review and the outcome of the initial mapping of the recommendations against the Fire Standards.

## Recommendations

- That the Fire Standards Board note the content of this paper
- That a new standalone Misconduct Fire Standard is not necessary or appropriate
- That there is further exploration with the NFCC People, Culture and Leadership (PCL) Hub and the network of SME's on the conclusions in this paper regarding the strengthening of the Leading and Developing People and Leading the Service Fire Standards; and
- The proposed pausing of any work on the exceptional reviews of the Leading and Developing People and Leading the Service Fire Standards relating to Asset Management and Finance in order to allow time to complete the consideration of addition of elements concerning the handling of misconduct in those standards.

# **Fire Standards Board**

## **Response to HMICFRS Misconduct Review: Fire Standards Misconduct Gap Analysis Report**

March 2025

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## Introduction and Background

At the Fire Standards Board meeting in September 2024, Board member Mark Hardingham, NFCC, presented a paper proposing a Fire Standards Board response to HMICFRS’s misconduct thematic review, *“Standards of behaviour: The handling of misconduct in fire and rescue services”*, published in August 2024. In his paper, he advocated that the Board consider the creation of a separate Misconduct Fire Standard as part of its response to the thematic review.

At its December 2024 meeting, the Board in response agreed to the Fire Standards Team undertaking the following work:

### **Activity 1 – Mapping Exercise**

The Fire Standards team would undertake a mapping exercise to identify whether certain existing Fire Standards, particularly the Code of Ethics, Leading the Service and Leading and Developing People, adequately covered the 15 recommendations identified in the Inspectorate's review.

If gaps were identified, the Team should make recommendations to the Board on how these could be addressed.

### **Activity 2 – Fire Standard Implementation Workshops**

Using the activity 1 mapping exercise as a guide, the Team would then adapt the existing Fire Standard Implementation workshop approach to accommodate any recommended changes or gaps in the existing provision. This might also include making recommendations to other NFCC Teams, including the PCL Hub, to consider any suggested changes, adaptations or additional new guidance or toolkits needed to support services in addressing the handling of misconduct.

### **Activity 3 – Deliver new activity**

To be aware that the mapping exercise and implementation approach might highlight potential new activity which either the Fire Standards or Implementation Team would deliver, subject to there being appropriate resources, and for these to be aimed at supporting services in realising the benefits of Fire Standards and NFCC implementation support.

This report details the findings relating to Activity 1 – Mapping Exercise and touches on activity 2. Activity 3 and any subsequent deliverables is dependent upon the outcome of Activities 1 and 2.

## Executive Summary

The Fire Standards team has conducted an initial assessment to identify any gaps in existing fire standards coverage, based on the 15 recommendations set out in HMICFRS's misconduct thematic review.

The table below lists the recommendations and the FSB gap analysis. It shows that of the recommendations, seven require no further action because:

- They are sufficiently addressed within existing fire standards; or
- The level of detail within the recommendations is not consistent with the type of content contained in the fire standards and would be better suited as either policy or guidance

The assessment resulted in the identification of eight recommendations where there were potential gaps in existing fire standards. These recommendations require further investigation with SME's from the NFCC PCL Hub and associated network, before being brought to the Fire Standards Board for consideration and decision.

Appendix A gives the full wording of each of the recommendations, the findings and the recommended response. The table below summarises the findings which relate to each HMICFRS recommendation:

HMICFRS Recommendation	FSB Gap Analysis Output	Relevant Fire Standard Impacted
<a href="#">1</a>	No further action required. The Fire Standards already address the recommendation	n/a
<a href="#">2</a>	Consider amendment to the Leading and Developing People and/or Leading the Service Fire Standards to include requirements for probationary employees. It is recommended that the Fire Standards Team explore this further.	Leading and Developing People Leading the Service
<a href="#">3</a>	No further action required. The recommendation is too detailed for a Fire Standard and may be better as policy or guidance.	n/a
<a href="#">4</a>	Consider amendment to the Leading and Developing People and/or Leading the Service Fire Standards to reference a professional standards. It is	Leading and Developing People Leading the Service

	recommended that the Fire Standards Team explore this further.	
<a href="#"><u>5</u></a>	No further action required. The Fire Standards already address the recommendation	n/a
<a href="#"><u>6</u></a>	No further action required. The recommendation is too detailed for a Fire Standard and may be better as policy or guidance.	n/a
<a href="#"><u>7</u></a>	No further action required. The Fire Standards already address the recommendation	n/a
<a href="#"><u>8</u></a>	Consider amendment to the Leading and Developing People and/or Leading the Service Fire Standards to include a criterion on misconduct. It is recommended that the Fire Standards Team explore this further.	Leading and Developing People Leading the Service
<a href="#"><u>9</u></a>	No further action required. The recommendation is too detailed for a Fire Standard and may be better as policy or guidance.	n/a
<a href="#"><u>10</u></a>	Consider amendment to the Leading and Developing People and/or Leading the Service Fire Standards to include consideration of external and independent investigations. It is recommended that the Fire Standards Team explore this further.	Leading and Developing People Leading the Service
<a href="#"><u>11</u></a>	Minor change proposed to explicitly mention misconduct in the existing Fire Standard.	Leading and Developing People
<a href="#"><u>12</u></a>	Minor change proposed to explicitly mention misconduct in the existing Fire Standard.	Leading and Developing People
<a href="#"><u>13</u></a>	No further action required. The recommendation is too detailed for a	n/a

	Fire Standard and may be better as policy or guidance.	
<a href="#">14</a>	Consider minor amendment to Leading the Service Fire Standard criteria to include reporting of its organisational responsibilities. It is recommended that the Fire Standards Team explore this further.	Leading the Service
<a href="#">15</a>	Consider amending the Leading the Service Fire Standard criterion outlined in the findings from should to must. it is recommended that the Fire Standards Team explore this further.	Leading the Service

The Fire Standard gap analysis demonstrates that the 15 HMICFRS misconduct recommendations closely map against two existing Fire Standards, Leading and Developing People and Leading the Service. To maintain clarity and the important status of those two Fire Standards within the entire suite, the team would advise that developing a further misconduct Fire Standards would be inappropriate and lead to duplication.

## Next Steps

Of the recommendations where further investigation is suggested, it is anticipated that there may be a small number of amendments to those two Fire Standards, which could be addressed with the inclusion of a single new criterion.

At this stage, it is too early to say whether a consultation would be required, and this will only be determined once the team has engaged with the PCL Hub and its network of SME's.

Alongside this, the Fire Standards Team proposes engaging with the PCL Chair and wider committee to ensure that the Fire Standards Board, along with the NFCC, are providing cohesive support to Fire and Rescue Services. The Fire Standards Team proposes to work with the PCL Hub to inform proposals to develop guidance and policies which may support the HMICFRS's recommendations.

The Leading and Developing People and Leading the Service Fire Standards have recently undergone reviews to determine whether amendments should be made to them to incorporate elements of finance and asset management. That process is still underway and proposed changes to those standards have been shared with the Board. It is recommended that the changes be published once, following the completion of the misconduct work.

## Recommendation

- The Board is asked to agree to the following:
  - That considering the results of the gap analysis a new Misconduct Fire Standard is not necessary or appropriate;
  - That there is further exploration with the NFCC PCL Hub and the network of SME's on the amendments required to action the conclusions in this paper on the Leading and Developing People and Leading the Service Fire Standards; and
  - The pausing of any work on the exceptional reviews of the Leading and Developing People and Leading the Service Fire Standards relating to Asset Management and Finance in order to allow time to complete the consideration of addition of elements concerning the handling of misconduct in those standards.

## Ongoing work (Activity 2)

The approach that the Implementation Team has taken to misconduct has been to demonstrate to FRSs how both the Leading the Service and Leading and Developing People Fire Standards already provide a framework for meeting the recommendations in the HMICFRS report.

The main vehicle for communicating the messages that the team has used has been a series of Thematic Leadership Fire Standard workshops delivered to different groups of regional services. The focus on addressing misconduct is at the heart of the delivery approach of the workshops. Each session includes a look at the approach to implementation, products, guidance and support available from the NFCC and a guided discussion (including handling misconduct) about progress in services towards the selected theme (see table below). The person responsible for managing the suite of Fire Standards in each service is invited to attend each session accompanied by the appropriate thematic lead and service sponsor for the leadership standards.

### Themes

Theme	Session
Introduction to the Leadership Fire Standards	Session 1
Service Improvement/Organisational Learning	Session 2
Workforce Planning <ul style="list-style-type: none"><li>• Talent Management</li><li>• Recruitment</li><li>• Training</li></ul>	Session 3
Communication and Engagement	Session 4
Leadership and Code of Ethics	Session 5
Wellbeing, Equality, Diversity and Inclusion	Session 6



The workshops are an opportunity for participant services to exchange ideas and information about approaches to embedding these Fire Standards, how NFCC products and tools can support this and to share other techniques and processes adopted. Each workshop is organised to allow time to develop strategies and plans to be delivered after the workshop to help embed learning from that theme and to make continuing progress.

Since July 2023, the Team has delivered 13 thematic workshops to 132 participants from 33 FRS and is continuing to roll these out in 2025.

# Appendix A

## Detailed findings

### HMICFRS Recommendation 1:

*By February 2025, chief fire officers should, as a priority, make sure their staff are aware of, and follow the Core Code of Ethics. FRSs should build the code into all relevant policies and practices*

Findings: The Leading the Service, Leading and Developing People and Code of Ethics Fire Standard all explicitly state that services must embed the Core Code of Ethics (core code) and all fire and rescue employees must embody the behaviours set out in the core code.

FSB Recommended Action: No further action as existing Fire Standards address the HMICFRS recommendation.

### HMICFRS Recommendation 2:

*By 1 February 2025, chief fire officers should make sure a policy for probationary staff is in place. This policy should make clear that FRSs can immediately dismiss probationers who fail to meet the required standards of behaviour set out in the Core Code of Ethics and the Code of Ethics fire standard.*

Findings: The Code of Ethics Fire Standard states that behaviours set out in the Core Code are embedded into its decision-making, policies, procedures, processes, and associated guidance that govern how the service manages and supports its workforce.

Additionally, the Leading and Developing People Fire Standard adequately covers the need for services to have robust policies and processes in place for the “effective recruitment, induction, ongoing development and training of their employees and volunteers”.

FSB Recommended Action: Consideration to include requirements for probationary employees within the Leading the Service and/or the Leading and Developing People Fire Standard. It is recommended that the Fire Standards Team explore this further.

### HMICFRS Recommendation 3:

*By 1 May 2025, chief fire officers should make sure their workforce plans allow staff to be moved from a wholetime watch to a different watch or station, within their contractual requirements, proactively and reactively as required.*

*By 1 May 2025, chief fire officers should also make sure firefighters who are promoted are posted to a different watch or station, including when the promotion is temporary for two months or more. If*

*this isn't possible, chief fire officers should show how the risks of reinforcing a negative culture have been addressed.*

#### Findings:

The Leading and Developing People Fire Standard does note that services must conduct robust workforce planning to fulfil certain requirements, none of which relate to culture.

As mentioned in HMICFRS's recommendation 3, the Code of Ethics Fire Standard states that the behaviours set out in the Core Code are embedded into its decision-making, policies, procedures, processes, and associated guidance.

FSB Recommended Action: The level of detail within this recommendation is not consistent of that within Fire Standards and therefore it is not recommended that Fire Standards cover the topic to this degree. No further action required.

#### **HMICFRS Recommendation 4:**

*By 1 February 2025, chief fire officers should make sure their FRS create or have access to a dedicated professional standards function to oversee the investigation of concerns raised within a FRS or from an external source. This should oversee cases to make sure they are investigated in a fair and transparent way, manage complex cases directly and act as a point of contact for all staff involved.*

Findings: The Leading and Developing People does not specifically mention a dedicated professional standards function. However, it does state that a service must have the following in place:

- robust and transparent performance management processes to effectively manage and learn from appraisals, grievances, complaints and disciplinary procedures
- systems, policies and processes in regard to positive employment relations
- robust and transparent performance management processes in place to effectively manage and learn from: appraisals; grievances, complaints and disciplinary procedures; competence achievement and maintenance.
- employee engagement policies and procedures, providing a clear and transparent route in highlighting organisational concerns, improvements and ideas in an open and inclusive environment.

FSB Recommended Action: The Leading and Developing People Fire Standard covers the key topics a professional standards function would be responsible for, but there is no explicit reference to a dedicated team, nor reference to investigations from external sources. It is recommended that the Fire Standards Team explore this further.

## HMICFRS Recommendation 5:

*By 1 November 2024, chief fire officers should make sure all staff understand how to raise a concern and use grievance and whistle-blowing processes. Chief fire officers should:*

- make sure staff know how FRSs will handle responses and maintain confidentiality and anonymity; and*
- explain how staff can access FRSs' whistle-blowing capability and the difference between whistle-blowing and other processes for raising concerns.*

Findings: The Leading the Service Fire Standard states that robust mechanisms should be in place to monitor and manage grievance, whistleblowing, complaints and staff disclosures.

The desired outcome of the Leading and Developing People Fire Standard states that the service prioritises the health, safety, and wellbeing of its people, who know where they can get help and support, if needed. It also states that the processes for appraisals, grievances, complaints and disciplinary procedures must be robust and transparent. Finally, at another point, it notes that there must be clear and transparent routes to feedback organisational concerns, improvements and ideas in an open and inclusive environment.

FSB Recommended Action: The Leading the Service and Leading and Developing People adequately cover the points within the recommendation. Additionally, the NFCC Implementation team deliver leadership workshops to services which showcase how NFCC products, such as the model policies and other PCL guidance, can be used to meet this recommendation. No further action required.

## HMICFRS Recommendation 6:

*By 1 February 2025, chief fire officers should make sure a programme of training is in place for all supervisors and managers on how to manage staff performance and welfare and how to raise an issue. It should be supported by relevant policies and procedures. Training should include:*

- staff welfare and absence management;*
- the process for managing individual staff performance, addressing poor performance and potential misconduct issues;*
- how to handle difficult conversations and resolve issues informally, if appropriate, when a concern is identified; and*
- clarifying the role of HR services in helping managers to deal with staff concerns and misconduct issues.*

*Chief fire officers should make sure all managers and supervisors attend the training programme*

Findings: The Leading and Developing People Fire Standard states that all employees, including leaders, are trained so that they are competent in their role and that competency must be maintained through continual professional development.

Furthermore, the same Fire Standard also states that an FRS must have in place systems, policies and processes in regard to: a) employment legislation; b) effective recruitment, induction, ongoing development and training of their employees and volunteers; c) the monitoring and management of employee and volunteer performance and competence; d) open and regular communications between leaders, employees, partners and stakeholders; e) fair, transparent and inclusive people and performance management practices; f) employees or volunteers exiting the organisation; g) the evaluation of workforce delivery; and h) positive employment relations.

FSB Recommended Action: The Leading and Developing People Fire Standard adequately covers the recommendation that those in managerial positions should be trained in how to manage their employees. The level of detail within this recommendation regarding what training should cover is not consistent of that within Fire Standards and therefore it is not recommended that Fire Standards cover the topic in question to this degree. No further action required.

### **HMICFRS Recommendation 7:**

*By 1 May 2025, chief fire officers should make sure the policies and processes for misconduct are consistent for all staff and are fairly applied within their respective conditions of employment.*

*By 1 August 2025, the National Joint Council for Local Authority Fire and Rescue Services and the National Joint Council for Local Government Services, supported by NFCC, should make misconduct processes consistent for all staff irrespective of the terms and conditions of their employment."*

Findings: The Leading and Developing People Standard states that an FRS must have robust and transparent performance management processes in place to effectively manage and learn from: a) appraisals; b) grievances, complaints and disciplinary procedures; and c) competence achievement and maintenance.

The Leading the Service Fire Standard states that a service must put robust and transparent controls and processes in place so that it can effectively monitor and manage: a) finances; b) commercial activities and procurement c) corporate risks; d) resources and capability; e) organisational performance; f) compliance with legislation and statutory responsibilities; g) communication, engagement and consultation; h) talent management, organisational development, and change; and i) disciplinaries, grievances, complaints, staff disclosures and whistle blowing.

FSB Recommended Action: No further action as existing Fire Standards address the HMICFRS's recommendation.

## HMICFRS Recommendation 8:

*By 1 November 2024, chief fire officers should make sure all allegations of misconduct are handled in a consistent way and staff have confidence in misconduct processes. Chief fire officers should carry out a full review of the processes, from initial identification of a misconduct issue through to the resolution or outcome. This should include a review of how FRSs:*

- *monitor and manage investigations;*
- *maintain accurate records; and*
- *adhere to required timescales.*

Findings: The Leading and Developing People Fire Standard states that an FRS must have robust and transparent performance management processes in place to effectively manage and learn from: a) appraisals; b) grievances, complaints and disciplinary procedures; and c) competence achievement and maintenance.

FSB Recommendation: There may be some merit in including a criteria relating to misconduct covering processes and policies; training to staff carrying out investigations; support to employees/wellbeing considerations; learning; and independent investigations to add additional clarity to the existing Leading and Developing People Fire Standard. It is recommended that the Fire Standards Team explore this further.

## HMICFRS Recommendation 9:

*By 1 August 2025, chief fire officers should introduce a case management system if they don't already have one. The case management system should allow data to be produced that will help them to better understand and oversee misconduct cases in their services.*

Findings: The Leading and Developing People Fire Standard states an FRS must have in place systems, policies and processes regarding the monitoring and management of employee and volunteer performance and competence; positive employment relations.

The same Fire Standard states that there must be employee engagement policies and procedures, providing a clear and transparent route in highlighting organisational concerns, improvements and ideas in an open and inclusive environment. Leaders will then act appropriately and proportionately with the items raised and share any learning, changes or actions back into the service.

FSB Recommendation: The level of detail within this recommendation is not consistent of that within Fire Standards and therefore it is not recommended that Fire Standards cover the topic in question to this degree. No further action required.

## HMICFRS Recommendation 10:

*By 1 May 2025, chief fire officers should make sure their FRSs have enough capacity to carry out their misconduct investigations. They should consider using external investigators or a similar independent resource to support the process if required."*

Findings: This is not explicitly covered by a Fire Standard, although the Desired Outcome section of the Leading the Service Fire Standard states that "[A service must have] fair, transparent and trusted people management practices"

FSB Recommended Action: Consider amendment to the Leading and Developing People Fire Standard to include the consideration of external and independent investigations. It is recommended that the Fire Standards Team explore this further.

## HMICFRS Recommendation 11:

*By 1 May 2025, chief fire officers should review the training their FRSs provide for supervisors and managers who investigate misconduct issues at all levels. Chief fire officers should make sure:*

- *all staff who carry out investigations receive adequate training to carry out the task;*
- *a programme of refresher training and ongoing support is available so that staff can maintain a level of competence; and*
- *it is clear how services' HR provision, staff associations and any trade union representative or fellow employee will support the investigation process.*

Findings: The Leading and Developing People Fire Standard has several criteria which address this recommendation and would be further strengthened with explicit mention of misconduct.

It states that an FRS must have in place systems, policies and processes in regard to: a) employment legislation; b) effective recruitment, induction, ongoing development and training of their employees and volunteers; c) the monitoring and management of employee and volunteer performance and competence; d) open and regular communications between leaders, employees, partners and stakeholders; e) fair, transparent and inclusive people and performance management practices; f) employees or volunteers exiting the organisation; g) the evaluation of workforce delivery; and h) positive employment relations.

A service must train and develop employees, including leaders, so they are competent in their respective roles.

It must also provide continual professional development to employees, including leaders, so competency is maintained and developed.

FSB Recommended Action: Minor change proposed to explicitly mention misconduct in the existing Fire Standard.

## **HMICFRS Recommendation 12:**

*With immediate effect, chief fire officers should make sure all staff are aware of the welfare support, including occupational health support, that is available to staff involved in misconduct processes. Chief fire officers should encourage all staff involved in misconduct processes to access this support, whether they are an alleged perpetrator, complainant, witness, investigator or decision-maker.*

*Welfare personnel should be independent of the investigation and have been appropriately trained for this role.*

Findings: The desired outcome statement and an underpinning criteria for the Leading and Developing people addresses this recommendation and will be further strengthened with an additional reference to misconduct.

The Desired Outcome states that “People know they can safely raise concerns and challenge behaviour, especially where the behaviour is not aligned to the Core Code of Ethics, its own service values, or codes of conduct. The service prioritises the health, safety, and wellbeing of its people, who know where they can get help and support, if needed.”

The relevant criteria states the service has in place: a) health and wellbeing policies and support which are inclusive, actively and widely promoted and embedded; b) health and safety policies and processes to ensure a safe working environment, in line with relevant legislation; c) provide clear support and advice for employees in relation to employment, leaving the service and welfare matters; d) employee engagement policies and procedures, providing a clear and transparent route in highlighting organisational concerns, improvements and ideas in an open and inclusive environment. Leaders will then act appropriately and proportionately with the items raised and share any learning, changes or actions back into the service; and e) recognition scheme that motivates, engages and encourages positive behaviours amongst employees.

FSB Recommended Action: Minor change proposed to explicitly mention misconduct in the existing Fire Standard.

## **HMICFRS Recommendation 13:**

*By 1 November 2024, fire and rescue authorities and chief fire officers should consider varying the approach to hearing appeals so that appeals for complex or serious cases are heard by a panel rather than one person.*



*By 1 February 2025, fire and rescue authorities and chief fire officers should make sure all FRS managers and members of fire and rescue authorities who hear appeals receive appropriate training.*

*Chief fire officers should make sure FRSs have a consistent approach to hearing appeals."*

Findings: This is not covered by a Fire Standard, and would be best addressed through guidance, training and policy, potentially model policies.

FSB Recommended Action: The level of detail within this recommendation is not consistent of that within Fire Standards and therefore it is not recommended that Fire Standards cover the topic in question to this degree.

We may wish to suggest to the NFCC PCL Hub that they consider whether this recommendation needs to be addressed through the work of their team, based on services demand for support. It is recommended that FSB engages with the PCL Hub on this.

#### **HMICFRS Recommendation 14:**

*By 1 November 2025, chief fire officers should implement a process that makes sure they can oversee and scrutinise their FRS's performance relating to misconduct issues. This process should provide:*

- *a strategic overview of performance and analysis of trends, including disproportionality;*
- *regular reporting of issues, outcomes and trends to the fire and rescue authority; and*
- *identification of learning outcomes and how they will be shared with FRS staff, to prevent repeat behaviours"*

Findings: One of the Leading the Service's criteria states that an FRS must put robust and transparent controls and processes in place so that it can effectively monitor and manage: organisational performance; compliance with legislation and statutory responsibilities; and disciplinaries, grievances, complaints, staff disclosures and whistle blowing;

FSB Recommended Action: Consider minor amendment to Leading the Service Fire Standard - "monitor and manage" to potentially be amended to "monitor, manage and report" in the criteria. It is recommended that the Fire Standards Team explore this further.

#### **HMICFRS Recommendation 15:**

*By 1 February 2025, chief fire officers should put in place a process for sharing learning from misconduct cases that have been resolved while preserving the confidentiality of all parties involved. Any learning should feed into the national system, when established.*

*By 1 May 2025, NFCC should establish a system for sharing learning from more serious cases of misconduct with fire and rescue service staff. The information shared should preserve the anonymity and confidentiality of all parties involved. The College of Fire and Rescue, once it is established, should take responsibility for maintaining this system."*

Findings: The Leading the Service includes a criterion that states that a fire and rescue service *should* consider its approach to organisational learning by identifying, capturing, evaluating and sharing learning which could benefit itself and others, engaging with national learning arrangements, where they exist.

NFCC has also established an Organisational Learning Team, which includes the engagement in governance processes from the NFCC PCL Hub.

FSB Recommended Action: Consideration could be made to the Leading the Service Fire Standard to change the criterion outlined in the findings from *should* to *must*.

It is recommended that the Fire Standards Team explore this further.

# Appendix A

## NFCC Response to Misconduct Review

The NFCC PCL, has analysed the 15 recommendations and placed them in one of four categories illustrated below:



Beyond this, the NFCC is not yet engaging in developing new work to support the recommendations, instead offering to help services based on demand for support. The Implementation team is providing direct support to a number of services by providing Leadership Thematic Fire Standard workshops, which frame NFCC products and guidance, including Core Code of Ethics and the Leadership Framework in how they support FRS to embed the two leadership Fire Standards.