



*Government response to
consultation exercise*

Operational Assessment of Service Delivery



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On 5th May 2006 the responsibilities of the Office of the Deputy Prime Minister (ODPM) transferred to the Department for Communities and Local Government

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Introduction

The Office of the Deputy Prime Minister (now the Department for Communities and Local Government) published an Operational Assessment of Fire and Rescue Service Delivery Consultation Paper on 6 April 2006. The Consultation Document invited responses to questions relating to a 'toolkit' for self assessment by Fire and Rescue Authorities of their service delivery in five specific areas:

- Risk Analysis
- Prevention and Protection
- Operational Preparedness
- Call Management and Incident Support
- Emergency Response

During May 2006, three seminars were hosted by Communities and Local Government and the Audit Commission in order to collect feedback from Fire and Rescue Authorities and to supplement formal consultation responses. The seminars were held in London, the West Midlands and Tyne and Wear. 130 delegates attended with 44 out of 47 FRAs represented together with other stakeholders.

The feedback from seminars and all of the formal responses were considered in drafting the final version of the Toolkit and Guidance which was issued with Fire and Rescue Service Circular 37-2006 on 6 July. A list of respondents to the consultation is in Appendix 2. A list of frequently asked and answered questions from the seminars is in Appendix 3.

Communities and Local Government undertook the consultation exercise according to the Cabinet Office's Code of Practice on Consultation. In view of the extensive involvement of Fire and Rescue Authorities in the first draft of the toolkit, the consultation ran for 10 weeks, ending on 16 June 2006.

Overview

The Consultation Document invited consultees to respond to specific questions on the format, coverage, weighting and scoring of the toolkit and the workload and timetable of the self assessment process. Details of the responses received are in Appendix 1.

46 responses were received from a range of individuals and organisations:

Type of Organisation	Number of responses
Fire and Rescue Authority/Service	38
Employee Representative	3
Other Stakeholders	4
Anonymous	1

Analysis of questionnaire responses

Q1. DO YOU AGREE THAT THE TOOLKIT WILL OFFER A VALID ASSURANCE THAT SERVICE DELIVERY IS MANAGED IN ACCORDANCE WITH HS(G) 65?

Thirty seven respondents answered this question. One strongly agreed; thirty agreed; six were neutral.

Summary of comments

Most respondents agreed that the Toolkit would offer valid assurance that Service Delivery is managed in accordance with HS(G) 65. Respondents were content that links to the safe person concept and dynamic risk assessment were evident in the toolkit and that familiarity with HS(G) 65 would assist assessors to examine the Key Lines of Enquiry. A few respondents expressed reservations.

Our response

As most respondents agreed, the general direction and coverage of the toolkit and key lines of enquiry remain unchanged. A statement about Health and Safety being integral to all aspects of Service Delivery has been added to the Toolkit Guidance (page 8).

Q2a. DO YOU AGREE WITH THE OVERALL FORMAT OF THE TOOLKIT?

Thirty six respondents answered this question. Twenty six agreed; ten disagreed.

Summary of comments

Most respondents agreed that the overall format of the toolkit was satisfactory and that existing familiarity with the HS(G) 65 format would help FRAs in its use.

A number of respondents said that the toolkit was lengthy, had a high degree of duplication and that more detailed guidance was needed in order to help FRAs focus. A few respondents suggested alternative formats and felt that the toolkit was under developed.

Our response

The general format of the toolkit remains unchanged but considerable work was undertaken to remove duplication from key lines and areas of enquiry and improve the appearance of the document.

Descriptions of the Key Lines of Enquiry were moved to the Guidance section of the toolkit and descriptions of each key area were added along with additional guidance about the self assessment process. The Key Lines of Enquiry were reduced slightly in length from 38 pages to 34 pages.

Q2b. WOULD IT BE BENEFICIAL TO SIGN-POST WHICH PARTS OF THE TOOLKIT HAVE GREATER WEIGHT/IMPORTANCE?

Thirty six respondents answered this question. Thirty three agreed; three disagreed.

Summary of comments

If weighting is to be used, an explanation of the rationale behind them is required. Descriptors for the different levels of KLOE performance (1 – 4) would greatly assist understanding the importance of the various toolkit requirements. FRA Integrated Risk Management Plans allow for a greater degree of flexibility to determine local priorities which the toolkit should allow for.

Our response

Whilst most of the respondents agreed that it would be beneficial to signpost which parts of the toolkit had greater importance, there was no strong argument for doing this put forward. Descriptors were allocated to levels 2 and 3 performances to enable FRAs to better understand their importance and links to scoring.

Q3. DO YOU AGREE THAT THE SECTION OF EACH KLOE SHOULD BE STRUCTURED ON THE BASIS OF THE MODEL SET OUT IN HS(G) 65?

Thirty seven respondents answered this question. Twenty nine agreed; eight disagreed.

Summary of comments

It is a good idea in principle but leads to much repetition. It is a structured, recognised approach and will assist compliance against a checklist but not in terms of local governance, risk assessment and local priority setting. The validity of having separate key areas for audit and review is questionable as they may not be as significant as other key areas.

Our response

The key areas of enquiry remain unchanged in their coverage. Audit and Review were combined into one key area, recognising their close relationship and reducing their weight within each KLOE.

Q4. DO YOU CONSIDER THAT THE FIVE COMPONENTS OF THE TOOLKIT COVER THE AREAS SUFFICIENTLY? ARE THERE ANY OTHER AREAS THAT NEED TO BE INCLUDED?

Thirty five respondents answered this question

- For Risk Analysis thirty three said yes; two said no;
- For Prevention and Protection thirty one said yes; four said no;
- For Operational Preparedness thirty one said yes; four said no;
- For Call Management and Incident Support thirty four said yes; one said no;
- For Emergency Response thirty one said yes; four said no.

Summary of comments

The KLOEs cover service delivery areas sufficiently and are comprehensive, detailed and methodical. The KLOEs are correct in principle and are thorough in their nature to the point of duplication. Descriptors are essential for consistency purposes.

The KLOEs are not necessarily in the right logical order and could be better linked to the national framework and IPDS. There is some duplication of CPA around management and corporate structures. FRAs have already started work on self assessment based on this consultation and any major changes to the KLOEs would create additional work.

Our response

The five KLOEs remain unchanged in title and the order they appear in. Reference to learning and development being integral to all aspects of Service Delivery has been added to the Toolkit Guidance (page 8) and relevant self assessment focuses.

Communities and Local Government recognise the overlap with CPA around corporate structures but this remains part of the KLOEs so that management structures for service delivery are specifically explored as an integral part of performance.

Q5. DO YOU SUPPORT THE PRINCIPLES OF THE SCORING PROPOSALS?

Thirty seven respondents answered this question. Nineteen agreed; ten were neutral; six disagreed; two strongly disagreed.

Summary of comments

Seems unfair to score as a 1 overall if any KLOE is below minimum requirements and could have achieved 4s in all the others. More detail of the scoring mechanism is needed before it could be fully supported. There is a lack of guidance on how to score KLOEs and their descriptors.

Our response

Scoring principles have been brought in line with the Audit Commission proposals to promote consistency and ease of approach. The key areas of Audit and Review have been combined to allow for a single rolled-up scoring mechanism. Levels of performance have been allocated to key areas descriptors together with a written description to fully explain the different levels of performance and the approach FRAs should take when scoring themselves (page 14).

Q6. DO YOU SUPPORT THE PRINCIPLES OF THE MEANS OF ENSURING CONSISTENCY (QA) AND THE REVIEW PROCESS?

Thirty seven respondents answered this question. One strongly agreed; thirty one agreed; three were neutral; two disagreed.

Summary of comments

A robust moderation and review processes is required. The final toolkit must include comprehensive guidance and explanation. Lessons should be learned from CPA with FRAs having a more substantial role in ensuring consistency. Reviewers need to be made aware of local complexities in their training. The process must be transparent throughout with impartiality assured. Need to know exactly what is required to achieve scores so that consistency can be assured between FRAs.

Our Response

Representatives from FRAs were sought to sit on the consistency panels. There will be two FRA representatives, one Communities and Local Government representative and one Audit Commission representative on each panel. Training is being provided to ensure consistency of approach and background to the consistency and review process will be shared with FRAs.

Q7. DO YOU CONSIDER THAT THE GUIDANCE NOTE AND TOOLKIT PROVIDE SUFFICIENT INFORMATION FOR YOU TO CARRY OUT A SELF ASSESSMENT?

Thirty six respondents answered this question. Twenty one agreed; four were neutral; seven disagreed; four strongly disagreed.

Summary of comments

More comprehensive guidance and a self assessment template would help. A word limit instead of a page limit would be better.

Our Response

The guidance for under taking a self assessment was strengthened with learning points from the West Midlands peer review (page 16). A word limit of 12, 000 words was applied and a self assessment template was made available to FRAs on 11 July 2006.

Q8. DO YOU BELIEVE THE TIMETABLE, AS PROPOSED ALLOWS SUFFICIENT TIME FOR THE ASSESSMENTS TO BE CARRIED OUT?

Thirty five respondents answered this question. Sixteen said yes; nineteen said no.

Summary of comments

Concerns over the short time between end of consultation and issue of the revised toolkit. The effect of self assessment and visits during the summer leave period when Audit Commission use of resources assessments are also being carried out needs to be considered.

Our Response

Whilst the demands of the timetable are acknowledged, services have had up to six months notice of this work and due to Audit Commission work on single tier county councils, of which county council FRA assessments form part, adjustment of the timetable was not possible. The Use of Resources and Direction of Travel assessments are taking place after the self assessment process has been completed, as the Audit Commission combined and slightly delayed the work. The effect of this has been to avoid a clash of timetables for the self assessment and other two assessments. The review team work consists of three days with each service, spread over the period 14 August – 30 November. The majority of this falls outside of the summer leave period.

Q9. DO YOU THINK THE TOOLKIT COMPONENTS SCORES SHOULD BE WEIGHTED?

Q10. IF YES DO YOU AGREE WITH THE PROPOSED SYSTEM?

9. Thirty five respondents answered this question. Twenty four said yes; eleven said no.

10. Twenty six respondents answered this question. Of those who replied yes to Q9, fourteen said yes; nine said no.

Summary of comments

Weightings should be applied to areas which support the National Framework. Full justification required for any weighting system to be used. Some respondents did not agree with weightings being applied as KLOEs are equally important and rely on the effectiveness of each other to support service delivery functions.

Our Response

Although most respondents agreed that toolkit components scores should be weighted, there was no agreement on which areas should carry a greater weighting. In the absence of a clear justification for weighting, the weighting was removed from the KLOEs so that they carry equal importance and form a complete service delivery control loop. Descriptors were allocated to levels 2 and 3 performances to enable FRAs to better understand their importance in relation to scoring.

Q11. DO YOU AGREE WITH THE ESTIMATED WORKLOAD ARISING FROM USING THE SELF ASSESSMENT TOOLKIT?

Thirty four respondents answered this question. Four said yes; thirty said no.

Summary of comments

Workload and timing of the self assessment mean 10 days is unrealistic. A template for returns would help.

Our Response

Communities and Local Government recognise that 10 days was an under estimation of the resources required to complete a self assessment. The amount of resources required will vary between FRAs and their chosen approach. The extent to which the FRA is “self aware” will also have an impact on the resources required. It is also hoped that the resources required will reduce in the future when a sustainable baseline has been put in place. A ten step approach to undertaking a self assessment has been added to the guidance (page 16).

APPENDIX 1

Number of responses by question

No.	Question	Total responses	Yes	No	Strongly agree	Agree	Neutral	Disagree	Strongly disagree
1	Do you agree that the Toolkit will offer a valid assurance that Service Delivery is managed in accordance with HS(G) 65?	37	–	–	1	30	6	0	0
2a	Do you agree with the overall format of the toolkit?	36	–	–	–	26	–	10	–
2b	Would it be beneficial to sign-post which parts of the toolkit have greater weight/importance	36	–	–	–	33	–	3	–
3	Do you agree that the section of each KLOE should be structured on the basis of the model set out in HS(G)65	37	–	–	–	29	–	8	–
4a	Do you consider that the five components of the toolkit cover the areas sufficiently?								
	Risk analysis	35	33	2	–	–	–	–	–
	Prevention and Protection	35	31	4	–	–	–	–	–
	Operational Preparedness	35	31	4	–	–	–	–	–
	Call Management and Incident Support	35	34	1	–	–	–	–	–
	Emergency Response	35	31	4	–	–	–	–	–
5	Do you support the principles of the scoring proposals?	37	–	–	0	19	10	6	2
6	Do you support the principles of the means of ensuring consistency (QA) and the review process?	37	–	–	1	31	3	2	0
7	Do you consider that the Guidance Note and Toolkit provide sufficient information for you to carry out a self assessment?	36	–	–	0	21	4	7	4
8	Do you believe the timetable, as proposed, allows sufficient time for the assessments to be carried out?	35	16	19	–	–	–	–	–
9	Do you think the toolkit components scores should be weighted?	35	24	11	–	–	–	–	–
10	If yes to Q9, do you agree with the proposed system?	23	14	9	–	–	–	–	–
11	Do you agree with the estimated workload arising from using the self assessment toolkit?	34	4	30	–	–	–	–	–

APPENDIX 2

Respondents

Anonymous

Audit Commission

Avon Fire and Rescue Service

Chief Fire Officers' Association

Cleveland Fire Authority

Cornwall County Fire Brigade

Cumbria Fire and Rescue Service

Cumbria Fire and Rescue Service Operational assessment team

Derbyshire Fire and Rescue Service

Devon Fire and Rescue Authority

Dorset Fire and Rescue Service

East Sussex Fire and Rescue Service

Essex County Fire and Rescue Service

Fire Brigades' Union

Fire Protection Association

Greater Manchester Fire and Rescue Service

Hampshire Fire and Rescue Service

Health and Safety Executive

Hereford and Worcester Fire and Rescue Service

Humberside Fire and rescue Service

Institution of Fire Engineers

Isle of Wight Fire and Rescue Service

Julian Hilditch

Kent Fire and Rescue Service

Lancashire Fire and Rescue Service

Leicestershire Fire and Rescue Service

London Fire and Emergency Planning Authority

Merseyside Fire and Rescue Service

Norfolk Fire and Rescue Service

Northamptonshire Fire and Rescue Authority
Northumberland Fire and Rescue Authority
North Yorkshire Fire and Rescue Service
Nottinghamshire Fire and Rescue Service
Oxfordshire Fire and Rescue Service
Royal Berkshire Fire and Rescue Service
Shropshire Fire and Rescue Service
Somerset Fire and Rescue Authority
South Yorkshire Fire and Rescue Service
Staffordshire Fire and Rescue Service
Surrey Fire and Rescue Service
Tyne and Wear Fire and Rescue Service
Warwickshire Fire and Rescue Service
West Sussex Fire and Rescue Service
West Midlands Fire Service
West Midlands Region fire and rescue services
West Yorkshire Fire and Rescue Service

APPENDIX 3

Frequently asked questions and answers

1. WILL YOU TELL US WHAT THE KEY ISSUES ARE TO HIGHLIGHT IN THE SELF ASSESSMENT?

We are considering signposting parts of the toolkit to carry greater weight and will share information and bounce proposals with the CFOA working group. Key issues should be evident from the final toolkit. Weighting is part of the consultation and views are welcomed – it represents the importance of both areas; service delivery and outcomes.

2. WILL THE PROCESS USED BY COMMUNITIES AND LOCAL GOVERNMENT TO DETERMINE WHETHER THE SELF ASSESSMENT SCORE IS VALID BE OPEN TO FRA'S?

Yes, the process will open. Anything we do to vary judgements will place the onus on us to justify that and the same applies for consistency panels.

3. HOW WILL YOU SEEK TO ENSURE THAT SCORING THE SELF ASSESSMENT IS CONSISTENT BETWEEN FRA'S?

We are considering reformatting the toolkit to provide descriptors (like the Use of Resources assessment) and to avoid scoring being open to interpretation. The toolkit should be treated as a sub-body of work with the consultation and pilot activity helping to shape the finished product.

4. DO YOU PLAN TO REDUCE THE DUPLICATION IN THE TOOLKIT? WE ONLY HAVE 20 PAGES TO DO THE SELF ASSESSMENT – IS IT APPROPRIATE TO REFER BACK?

Yes it is appropriate to refer back to previous evidence e.g. Training and Development Strategy. The reason for repetition is because we have adopted the HS(G) 65 format and examine six themes within each KLOE.

5. WHY THERE IS NO H&S PI'S INCLUDED IN THE BASKET OF PI'S?

PI's need to be outcome based as a measure of the FRA performance – performance around Health and Safety is captured in the operational assessment.

6. WHAT DO YOU SEE AS POLICY? E.G. WE HAVE BEEN CROSS JUMPING FOR 20 YEARS BUT DO NOT HAVE A WRITTEN DOWN POLICY

We want pointers to things; it is up to the FRA to decide what evidence of policies is. We will look from the strategic level through to practices in place. The FRA is responsible for ensuring competency of staff – this may be via a relevant external qualification but is more about whether they are trained to do it, supervised and monitored. Accepted practice is policy. We do not want FRA's to be quickly writing policies.

7. THE ASSESSMENT IS A SUBSTANTIAL PIECE OF WORK – IS IT WORTH OUR RESOURCES?

We are looking to put something sustainable into place for the future and the resources required will become less as we work from this year's baseline.

8. WILL WE GET TO SEE THE REVISED TOOLKIT IN ADVANCE OF STARTING TO COMPLETE THE SELF ASSESSMENT?

The timetable doesn't allow for the toolkit to be consulted on again. It started life as a CFOA/Communities and Local Government assurance tool and covered eight areas but has been condensed to five and remodelled. The content comes from subject matter experts and is unlikely to change as the pilot studies have said that the content is appropriate. Descriptors will be added and criteria may be signposted. We would like to go back to the working group with a reformatted toolkit and test it on stakeholders but time is of the essence. This is a genuine consultation process and we will incorporate consensus views.