

# Norfolk Fire & Rescue Service – Keep in safe hands

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Norfolk County Council's  
formal detailed response to the  
PCC's business case



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# **1 Summary of key comments and areas of concern on the PCC's business case**

Detailed comments from the County Council on the 'A Case for Change' document are set out in this consultation response document.

In summary, the County Council has a number of key common areas of concern relating to the information set out in the business case, and in particular in relation to Option 3 – which the PCC is proposing. These concerns are:-

- Removing the fire and rescue service from the County Council presents a significant financial risk to the service, and therefore a risk to public safety.
- The claimed £10m efficiency figure is speculative and misleading.
- The medium term financial plan figures are flawed.
- It is not clear which service (police or fire and rescue) will benefit from any claimed savings and additional investment.
- The proposal makes a number of assumptions and untested claims.
- The cost and disruption of change is unquantified and untested.
- The proposed changes to operational response are not clearly articulated and have not been risk assessed, and therefore there is a significant risk to their deliverability and ultimately public safety.
- The claimed benefits could be achieved without a change in governance, and without the associated cost and disruption.

**In summary, the County Council's clear view is that, based on the evidence and information set out in the 'A Case for Change' document, there is no case for a change in governance arrangements for the Fire and Rescue service in Norfolk.**

**We do not believe that the case published by the PCC would meet the statutory tests of economy, efficiency, and effectiveness.**

**We have concerns that the proposal, if implemented, would create a real risk to public safety.**

**Therefore, the County Council cannot support the proposal.**



## **2 General comments**

### **A Deliverability**

Many of the figures used to calculate the claimed overall savings are theoretical, without detail and would be subject to further work to develop associated individual business cases. Any claimed benefits are theoretical only. The true costs and benefits are not known, and therefore there are significant deliverability risks.

In terms of operational delivery, the way that the Norfolk Fire and Rescue Service is organised is determined by the statutory Integrated Risk Management Plan (IRMP). The operational changes being proposed do not feature in the current plan and so they would need to be considered as part of developing a new IRMP so that they can be fully assessed. There is a statutory requirement for a public consultation on a proposed new IRMP, which enables the public to shape the future of the service, and this would need to be carried out before it could be finalised.

There is no guarantee that the proposed operational changes, once fully risk assessed and consulted on, would be considered as suitable to be delivered and they are theoretical at this stage. Therefore, we have concerns about the deliverability of the proposals and associated savings.

The scoping work in preparation for the Norfolk Fire and Rescue IRMP for 2020 onwards has commenced. It is this process where any changes to emergency and operation response would be risk assessed and, where relevant, consulted on.

A key element of the existing efficient operational response in Norfolk is on-call (retained) firefighters. This model of delivery does not appear to have been understood.

Over 80% of the Fire and Rescue Service's stations are crewed solely by on-call retained firefighters. This means that other than training, they are only called in to work when it is essential (where there is an emergency) and are paid on this basis. This is not free resource that is sitting around waiting to be called out. Additional responsibilities and additional time delivering service by this workforce will increase costs.

### **B Why a change in governance is not needed**

We have not seen any proposals in the document that require a change in governance in order to deliver.

We have also not seen any evidence that a change in governance could increase the pace of change, or deliver better solutions.

The reasons why we think the County Council should continue to run Norfolk's Fire and Rescue Service are set out on page 30 of this document. The risks and dis-benefits of removing the service from the County Council are included at page 31 of this document.

## **C Public safety**

We have significant concerns about the impact on public safety. These are in two areas.

The first is the financial impact. The proposed change of governance would mean that the funding for the Norfolk Fire and Rescue Service would be ring fenced and therefore unable to benefit from the County Council's ability to allocate its total income from Council Tax to protect it. As such, the service would need to directly address any funding pressures from within the existing budget. Recent examples include the high levels of deployment to deal with wildfires and increased activity dealing with the prolonged snow last winter.

It appears that the service, if the proposals were implemented, could be facing an almost 20% reduction in fire engine capacity in rural areas, and would impact on our ability to respond to emergencies and would mean the service could not be resilient. This would represent an unacceptable level of public safety risk.

The second public safety concern is around operational response. The operational changes proposed within the document are untested, unquantified and it is difficult to understand what they actually consist of. None have been assessed in terms of risk or public safety impact.

A move to the PCC would mean that the Fire and Rescue Service would appear as a separate line on the Council Tax bill. It would be possible for the service to increase Council Tax, but this increase would be capped (without a local referendum) in the same way that it is currently for the County Council. If the Norfolk Fire and Rescue Service was a stand-alone service (in the way being proposed by the PCC), and the budget continued at the same levels that have been provided by the County Council (i.e. was protected in the same way as it is now), then the service would have had to raise council tax by 16% over the spending review period 2016/17 to 2019/20. This would be well in excess of the Government's permitted limits for what Council Tax can be raised without a local referendum.

## **D Local authority fire and rescue service model**

There are two main types of fire and rescue service. Stand-alone services - where the service is a separate stand-alone entity – and local authority embedded services. In Norfolk, the Fire and Rescue service is a local authority embedded service, meaning it is an integral and integrated part of the County Council.





In general terms, we can support changes in governance for stand-alone Fire and Rescue authorities, and we are aware that the Home Secretary has approved a number of these. Changes in these services provide some obvious immediate benefits in terms of providing public transparency and governance arrangements (arrangements that were unsatisfactory in some stand-alone authorities). They are also relatively straightforward to achieve.

The situation where the service is governed as part of a County Council is different. Disaggregation from the County Council would not be straightforward. In addition, there are already strong public accountability and governance arrangements in place through the Council's 84 locally elected Members.

We note that the Home Secretary has only approved one local business case for a local-authority led service, in Northamptonshire and in the context of a failing authority (see comments at 2.5 below). In contrast, Norfolk already benefits from a well performing service with strong financial management.

### **3 Detailed comments on the PCC's business case**

The 'A Case for Change' document is structured in a number of sections (sections 2-7), each with sub headings.

For ease of reference and clarity about how the County Council's comments align to the information included in the business case, our detailed comments on the consultation response as set out below under these headings.

#### **A Strategic Case**

##### **2.1 The purpose of this section**

No comments.

##### **2.2 There are many drivers for change**

No comments.

##### **2.3 There is a national agenda to reform fire and rescue services**

We support the national agenda for reform. The introduction of the new inspection regime for Fire and Rescue services will provide the basis for the service to be assessed, and also the opportunity for learning across the whole fire and rescue family.

##### **2.4 The Policing and Crime Act 2017 presents an opportunity**

No comments.



## **2.5 New governance models are already emerging**

In respect of Northamptonshire County Council, we do not agree that their position is similar to that of Norfolk County Council.

We are aware that the Home Office has approved the proposal to change governance in Northamptonshire to enable a Governance Model under the Police, Fire and Crime Commissioner. We are also aware that the County Council supported this move as being in the best interests of the public. However, it is important to note the context within which this approval and support was given, i.e. that:-

- The County Council is a failing authority with significant financial issues
- It is being managed by two Government appointed commissioners
- An unprecedented two Section 114 notices have been issued in the last 12 months
- The structure of the council will be changing to a new unitary model, and government has been clear that a single unitary council is not an option

## **2.6 Norfolk is a dynamic place with its own challenges**

No comments.

## **2.7 Norfolk County Council has its own strategic priorities**

It is correct that the Fire and Rescue service does not feature specifically among the strategic priorities set out in the Norfolk County Council vision for Norfolk in 2021. None of the County Council's services feature specifically in this vision. This is because the document sets out the vision for Norfolk (and communities); it is not intended to be a vision for service delivery.

The comment that '...NFRS is a comparatively small component of Council operations...' is correct in terms of the County Council's overall spend. However, the service continues to be a priority for the County Council, which is why we have continued to protect the service.

The Fire and Rescue Service is not a small component of the Fire and Rescue Authority – the Communities Committee. 59% of this Committee's revenue budget relates to the Fire and Rescue Service.

## **2.8 Norfolk Fire and Rescue Service recognises the value of collaboration**

We have a mature and strong track record of collaboration, and are committed to continued collaboration.

We disagree with the comment 'The service has been under pressure to make further savings to support Norfolk County Council's financial plans'. Like all parts of the County Council, the Fire and Rescue Service seeks to identify opportunities for efficiency savings each year to mitigate the impact of Government funding reductions. This is no



different to the approach taken by other publicly funded services, including Norfolk Constabulary.

We don't disagree that 'demand continues to shift away from a conventional fire-fighter role', but do not necessarily agree that the shift in demand is towards just "...road traffic collisions and community safety". In particular, the key demand pressures being faced by the service are:-

- an increasing and ageing population. People who are elderly or limited mobility are at the highest risk of losing their life in a fire. Norfolk has a high proportion of older people, and it is increasing.
- climate related – increases in severe weather events, including coastal and inland flooding and forest fires. Norfolk is the 10<sup>th</sup> most at risk area of flooding. We are also seeing increases in the need for water rescue (also see 4.3.6 below).

## **2.9 Under the PCC, Norfolk Constabulary is modernising its service**

No comments.

## **2.10 Current collaboration provides a starting point**

The SWOT analysis states the "Police/Fire Collaboration Board no longer meets". The Board was formed as the Norfolk Emergency Service Collaboration Steering Group, and this Group continues to meet. This meeting involves senior officers from fire and rescue, police and ambulance services.

## **2.11 There are further collaboration benefits but these are getting harder to realise under the current model**

There is no evidence that a change in structure/governance will make collaboration opportunities, easier, better or faster. Our experience is that willing co-operation and a commitment to deliver agreed priorities delivers the best results.

We agree that it is getting harder to realise the benefits of closer collaboration. That is because we have been working together for some time, and there are simply no quick wins left.

## **2.12 Better strategic alignment could be a game changer**

Fundamentally, the Fire and Rescue service and the Police Service have different overarching priorities, operational plans, approaches and cultures because they provide different services. This is not a bad thing. The two services are different and their respective plans and approaches reflect that.

That does not mean that there isn't any strategic alignment or common ground. There are already a number of very specific common objectives between the Police and Fire and Rescue, and these have underpinned our collaboration and joint working to date. It





should be noted that these aspects of common interest are operational and public facing and, as such, a change in governance is incidental rather than critical.

We have noted the analysis of strategic alignment table set out in the consultation document, and agree that there are areas where there could be benefit from a more integrated approach. However, a similar table could be compiled to show similar synergies and opportunities between the Norfolk Fire and Rescue Service and social care, or the NHS, or other Fire and Rescue Services. The role carried out by the service is wide ranging and it is of no benefit to communities to seek to align to just one other service.

## **2.13 Conclusion – there is a strategic case for change**

We do not agree that the information in the business case sets out a strategic case for a change in governance.

Clearly there is strategic case for reform of public services, and this is recognised by Government (including through the implementation of the Policing and Crime Act 2017) and the National Fire Chiefs Council. However, there is no case in Norfolk for a change in governance to achieve appropriate change and reform of services.

## **B Economic Case**

### **3.1 The options that were considered**

#### *3.1.1 The purpose of this section.*

No comments.

#### *3.1.2 The options*

No comments.

#### *3.1.3 Option 1 – Enhanced voluntary collaboration*

We believe that option 1 – enhanced voluntary collaboration - offers the best balance of benefits of risks.

#### *3.1.4 Option 2 – PCC representation model*

No comments.

#### *3.1.5 Option 3 – Governance model*

No comments.

#### *3.1.6 Option 4 – The Single employer model*



No comments

## **3.2 How the options were evaluated**

### *3.2.1 Critical success factors*

We note that the intention is only to include financial benefits where there is strong evidence to support the values presented. It is notable therefore that none of the proposed efficiencies have been reflected in the Medium Term Financial Plan (see comments at 6.4 below).

### *3.2.2 Scoring methodology*

The evaluation model takes into account the changes across both the police and fire and rescue services. Because the assessment takes into account both of these, it is very difficult to see what relates to, or could impact on, the Norfolk Fire and Rescue Service. This is critical in terms of consultation as it is difficult to understand the implications and potential benefits for the fire and rescue service without this clarity. It is possible that all of the benefits could fall to the police service.

## **3.3 Economy and efficiency**

### *3.3.1 Overview*

None of the proposals in the document are dependent upon a change in governance and we have not seen any evidence that a change in governance will make the proposed changes easier to deliver. Therefore, we cannot see how the ratings for economy and efficiency can be different across options 1, 2 and 3.

We do not believe that the economic case has been proven.

### *3.3.2 Options 1 and 2 Enhanced voluntary collaboration and PCC representation model*

We believe that option 1 – enhanced voluntary collaboration - offers the best balance of benefits of risks.

### *3.3.3 Option 3- PCC governance model*

The case claims that the PCC's office taking over the running of the Norfolk Fire & Rescue Service would be more efficient by a sum of £10m. We believe this claim is wrong as the business case acknowledges in the other options that a significant proportion of these efficiencies will be delivered without a change in governance. Therefore, it is misleading by overstating the proposed efficiencies for options 3 and 4.

From the savings table included in the business case, it is also difficult to understand what the actual level of saving will be. Rather than a £10m saving, the business case



states that the total efficiencies claimed over 10 years is £8.588m figure, at current values.

This £8.588m figure includes £4.696m of financial benefit that would be delivered in any of the options – meaning it includes the benefit of changes the fire and rescue service has already committed to, planned, and budgeted for. This is double counting. These efficiencies are being delivered now, without the need to change governance, and without the associated cost and disruption.

The actual claimed financial benefits attributable to a change in governance – which is what the public consultation is about – would, using the figures in the business case, therefore be £3.892m. We need to see more information about the proposed changes underpinning this efficiency figure to enable us to assess whether the proposals could really be delivered and would improve or at least maintain the same level of public safety. This number remains highly speculative. Not least because we don't believe many of the proposals will be deliverable, in particular the control room (see 4.4) the joint responding proposals (see 4.5) In addition, we have concerns that any savings from estates would benefit the police (see 5.3).

The supposed benefits identified in the case include a mixture of ongoing year-on-year savings and a number of proposals which will only deliver one-off benefits to capital spending. It is unclear whether these benefits would relate to the Police, or to Fire and Rescue service budgets. This is significant in terms of responding to the consultation as the business case is clear that the benefits of any efficiencies will go back to the service budget they originated from. In other words, savings from police budgets will be used to reinvest in the police, savings from fire and rescue budgets will be used to reinvest in the fire and rescue service. The claimed savings appear to come from both budgets – but is not clear what, if any, benefit there could be for the fire and rescue service.

A significant amount of the savings claimed appear to come from selling off properties. It is difficult to see how the Fire and Rescue service can benefit from the sale of properties given the commitment not to close any fire stations, and it is not possible to move money between the police and fire and rescue service budgets. It would appear therefore that any sale of properties would be of police properties and so it would be the police service who benefit from this.

#### *3.3.4 Option 4 – the single employer model*

The Council is unconvinced by the suggestion that a transfer to the (smaller) OPCC organisation would deliver significant economies of scale in purchasing (£140k per annum from year 2 in figure 11) but that this would not result in any loss of existing economies of scale when separating from the (larger) County Council (see also comments at 5.7).

#### *3.3.5 Optimism bias, risk scoring and sensitivity analysis*

We note that a 'formula' type approach has been applied to determine optimism bias etc., rather than any practical assessment of deliverability that takes into account the



current context, work carried out so far, further work already underway and potential limitations in approach.

### **3.4 Effectiveness (improving public safety)**

#### *3.4.1 Overview.*

We have significant concerns about the operational proposals set out in the business case and the extent to which they could be delivered. We consider that they present a risk to public safety. See comments on the Public Safety Case later in this document.

Given our concerns, we do not agree that the ratings for Option 3 and 4 are appropriate.

We also do not agree with the 'moderate' rating for Options 1 and 2. The changes being progressed under these options have already been risk assessed and we can have a high level of confidence that they can be delivered. Therefore, the moderate rating does not seem to be appropriate. A budgeted plan to deliver £4.6m in savings which have already been risk assessed cannot be considered as 'moderate'. Indeed, this is significantly higher than the £3.892m that the business case claims would come from a change in governance (see 3.3.3 above).

#### *3.4.2 Option 1 – Enhanced voluntary collaboration*

We believe that option 1 – enhanced voluntary collaboration - offers the best balance of benefits of risks.

We do not agree that '...progress is likely to be slower and less likely to be optimised' under this option. It will still be for the Chief Constable and Chief Fire Officer to make operational decisions, whatever option is progressed.

Whilst the arrangements under this option are voluntary, it is in the context of a statutory duty for the services to collaborate. They can also be underpinned by clear direction from the respective service leadership.

There is no evidence that a change in governance will make collaboration opportunities better or faster. Our experience is that willing co-operation and a commitment to deliver agreed priorities delivers the best results.

#### *3.4.3 Option 2 – PCC representation model*

No comments.

#### *3.4.4 Option 3 – PCC governance model*

The 'evidence' quoted in this section as supporting a change in governance actually appears to support closer collaboration, and not specifically a change in governance. Therefore, this 'evidence' is also as equally relevant to Options 1 and 2. We agree with



the importance of a continuing drive on collaboration and the County Council, and the Norfolk Fire and Rescue Service, continues to be committed to this.

We do not agree that the bullet points set out on page 51 of the business case represent more streamlined decision making and accountability. It just offers a different model to the current one.

For example, the Chief Fire Officer already has full delegated power for fire and rescue budgets, and it is only those decisions that are financially significant or contentious that are taken through Committee for decision. In terms of accountability, it could be argued that taking these decisions in public through elected representatives is more accountable than the alternative model being proposed.

The comment on page 52 of the business case about sharing roles and responsibilities is interesting. The PCC has been very clear that there is no intention to share roles or to merge the two services, therefore it is unclear how this paragraph is relevant.

We are concerned about any proposals to reduce back office and support staff within the Fire and Rescue Service. See comments at 4.8 below.

#### *3.4.5 Option 4 – The single employer model*

This option references potential for further efficiencies through ‘...reconfiguring Fire and Rescue and Police services to match operational requirements rather than adhering to traditional service identities’. We would have various significant concerns about this, but as this is not the proposed option they are not detailed here.

### **3.5 Maintaining public safety**

#### *3.5.1 Overview*

The rating for option 3 does not appear to take into account the level of disruption that a change in governance would create for the service. Disaggregation from the County Council will be complex and will take significant time and resource to achieve, including resource from the Fire and Rescue service. We have noted that the Government Minister, in a letter to Hertfordshire County Council about the proposal in their area, acknowledged that extraction of fire and rescue from a County Council is complex.

Given implementation is anticipated to take 14 months – which we think is very ambitious and unlikely to be possible - the disruption will not be short term.

The ratings also do not appear to take into account the cost of the change. Whilst the business case estimates the cost of change for Option 3 to be £315k, this does not take into account the cost of County Council, including fire and rescue, resource that will be needed. We estimate the cost of change to be at least £1m, and have noted that Hertfordshire County Council (who are in a similar position to Norfolk) have estimated the cost in their area to be £1.3m.



### *3.5.2 The Public Safety Override*

We agree that there are no public safety issues for the existing service that are sufficient to justify the transition of governance to the PCC on public safety grounds.

We note the APACE guidance that a business case would not be considered by the Secretary of State if they are of the view that there would be an adverse effect on public safety. The County Council's view is that the option proposed by the PCC would negatively impact on public safety and therefore it should not be considered by the Secretary of State.

### *3.5.3 Option 1 and Option 2*

No comments.

### *3.5.4 Option 3 – PCC governance model*

See comments at 3.5.1 above.

We do not agree that a decision to proceed with a transfer in the face of opposition – including that of the County Council – would be a short term risk. Experience in other areas – in particular Hertfordshire – is that progressing in face of opposition significantly delays the process.

Another key point that has not been factored in is the impact that the disaggregation from County Council corporate support services could have. There is significant expertise in the County Council that the fire and rescue service currently taps into and which will not transfer over with the service if there was a change in governance. This is because relevant staff have wide ranging roles supporting a number of County Council services. Loss of this specialist resource (including strategic HR, procurement, finance, audit and other corporate services) and the organisational expertise and memory that will be lost with it, will impact on the effective delivery of support, at least in the short/medium term. The capacity and workload delivered by these corporate services will still be needed. This could create additional financial pressure as the workload and demand will continue. This financial pressure has not been factored into the business case in any way.

We would expect Option 3 to at least have an Amber, rating

The business case says that Option 3 can protect public safety in the longer term by ensuring fire and rescue services ‘...continue to be delivered in a way that meets public needs’. This comment is not quantified and no evidence is provided. We do not agree that this is the case, and our Integrated Risk Management Plan process ensures that the service is organised to meet the needs of the public. As part of the statutory public consultation process associated with this Plan, the public are able to have their say and help to shape the future of their Fire and Rescue Service.

### *3.5.5 Option 4 - The Single Employer Model*





Given that this option is higher risk than Option 3, we would expect it to have a Red rating (see comments at 3.5.4 above).

### **3.6 Deliverability**

#### *3.6.1 Overview*

We do not agree with the rating for Option 3. A 'moderate' or 'high risk' rating would be more appropriate. We do not believe that the proposed operational changes are deliverable. See comments at 3.4 above.

#### *3.6.2 Option 1 – Enhanced voluntary collaboration*

No comments.

#### *3.6.3 Option 2 – PCC representation model*

No comments.

#### *3.6.4 Option 3 – PCC governance model*

Taking into account experience elsewhere, particularly in Hertfordshire (see 3.5.4 above), we do not believe that it will be possible to implement by Summer 2019.

A change in governance will be complex to achieve, with numerous arrangements needing to be dismantled and reorganised on a stand-alone basis. Moving a local authority led Fire and Rescue service – like Norfolk's – has never been done before. On that basis alone, it is difficult to see how deliverability can be assessed as 'straightforward'. There is no tried and tested model that can be used, and those involved would be learning as they went.

Past experience suggests that projects such as this tend to incur higher costs, take longer, and deliver lower benefits than anticipated at the outset.

We do not agree with the assessment of additional costs to implement any change – and instead of the £315k additional cost quoted, we think the additional cost will be at least £1m (see 3.5.1 above for further comments).

Given the County Council's opposition to the proposed change in governance, if it was to progress then we believe an independent review would be needed.

#### *3.6.5 Option 4 – The single employer option*

No comments.

### **3.7 The preferred option**



Given the comments on the ratings above, and if they were adjusted in line with these comments, we do not believe that Option 3 would be assessed as the option that presents the best balance of benefits and risks.

We believe that option 1 – enhanced voluntary collaboration - offers the best balance of benefits of risks. This also enables the statutory duty placed on both the police and fire and rescue services to meet the requirements in the Policing and Crime Act 2017 to collaborate.

## **C Public Safety Case**

### **4.1 The purpose of this section**

No comments.

### **4.2 Overview**

We do not agree that there is a public safety case for change and we have significant concerns in this area.

We do not agree with the assertion that there is ‘difficulty of having to align two or more competing sets of strategic priorities’ or that this is making collaboration more challenging. See our comments on strategic alignment at 2.12 above.

The business case says that collaboration with the Ambulance Service would be easier to pursue with a ‘joined up strategic approach for fire and police’ on the basis that it means there will be ‘two rather than three approaches to consider’. All three services have shared purposes already, to protect and keep Norfolk people safe. They also already have a duty under the Policing and Crime Act 2017 to collaborate, and have already achieved a lot working together. There is no evidence to support the assertion that further strategic alignment would make it any easier to collaborate or open additional collaboration opportunities.

We are very concerned that the business case has presented a number of changes to operational and emergency response without any assessment of whether they are deliverable nor the impact they could have on resilience, response times or public safety. To base any element of the business case on such untested and unassessed propositions is flawed and disingenuous to Norfolk people.

Our initial assessment is that a number of these changes would not be deliverable, would not address the community risk that the Fire and Rescue service has a statutory duty to manage, and as such these changes represent a risk to the service and to public safety.

Putting aside the robustness and deliverability of some of the suggestions, all of the proposed changes could be delivered through closer collaboration and they do not

require a change in governance. There is no evidence to support the assumption that a change in governance would make any of these changes better, simpler or faster.

Changes to operational and emergency response would still be for the Chief Constable and Chief Fire Officer to determine for their relevant services. This is the case whether or not there is a change in governance.

### **4.3 Protection, prevention and community safety**

#### *4.3.1 Community Safety Hub*

We note the acknowledgement that there is already a co-located team in place including fire and rescue, police and other public service colleagues, all working together with a common purpose.

In principle, we support the suggestion of developing a fully integrated community safety hub. However, in practice it needs to be recognised that most of those in the team have a range of responsibilities, not all of which relate to the work of the community safety hub. Community safety is just one element of the community fire protection and prevention work we carry out. The business case does not seem to recognise the complexity of this work or the statutory duties set out in the Fire and Rescue Services Act 2004, the Regulatory Reform Order 2005 and the Fire and Rescue National Framework.

Whilst a centre of excellence type approach, with fully integrated teams, can be useful in some areas, we are not convinced that it is appropriate in this case. In particular, it is important for Fire and Rescue officers to be engaged in the wide range of activities carried out across the service, including emergency response, to enable them to operate effectively. We would not wish to see any integrated approach inadvertently introduce silo working.

The proposal also does not recognise the significance of working with health and social care colleagues to ensure Norfolk individuals can stay safe and healthy living in their own homes for as long as possible (also see 4.3.3 below).

#### *4.3.2 Community safety task force*

This could be achieved through collaboration and without a change in governance, e.g. through a virtual team. The joint community safety hub already put in place provides a strong basis on which to jointly consider this approach.

There are already some delivery arrangements in place with Police colleagues, including delivering the #Impact programme which is funded by the PCC.

#### *4.3.3 Volunteers*

The County Council's Community and Environmental Services Department (which is the home department of the Fire and Rescue Service) works with over 2,500 volunteers,



and there are many more supporting other County Council Services. We are already developing a strategy to ensure that we can better encourage and support these volunteers.

The 800 volunteers performing speed checks in villages and towns are already managed, co-ordinated and supported by the County Council's Casualty Reduction Team.

Whilst a co-ordinated approach to the management of volunteer resource across both police and fire and rescue services could be useful, we do not agree that co-ordinated delivery would be beneficial or achievable. This statement is naive and does not recognise the personal motivation and willingness of volunteers to give up their free time to support Norfolk people. Volunteers generally get involved in activities which they personally feel very strongly about, either because they relate to a personal passion or because they have benefited from the service in the past. It does not follow that because someone wants to volunteer for the Fire and Rescue Service that they may also want to do some Police Service volunteering activities. In fact, our experience of volunteers is the opposite, and trying to encourage individuals to step outside their personal passion and motivation actually discourages involvement.

#### *4.3.4 Safe and well visits*

We agree that there is scope for these visits – carried out across the whole of Norfolk - to be extended. We are already working with social care colleagues to do this, and have some pilot activities planned.

There is limited capacity to carry out these visits and therefore we need to ensure that they target the areas that can have the biggest impact, which is why our focus at this stage is on working with social care colleagues. We also make use of data that enables us to target our visits to the most vulnerable.

We do not think that a fire and police community safety volunteer approach would be deliverable (see comments at 4.3.3 above).

#### *4.3.5 Investing in children and young people*

We welcome closer collaboration on work to invest in children and young people. There is already significant joint work and delivery of programmes like #Impact. We have a strong track record in this area and welcome the opportunity to help others, through collaboration, to further develop approaches.

As with volunteers, we would not wish to negatively impact upon our ability to successfully engage by diluting messages and opportunities. For example, our cadets and Princes Trust programmes are both well established and recognised programmes that have led to new careers in the fire service; indeed Norfolk was the first fire and rescue service in the country to set up a cadets programme. Individuals participate because of the culture and traditions of the fire service and it is that service they wish to engage with.



#### 4.3.6 Water safety

Water rescue is not a statutory duty but the County Council has supported it because it is one of the highest risks on the national risk register, particularly pertinent in Norfolk given the threat of North Sea inundation and our history of inland flooding. If the service was not part of the County Council, it would be more difficult to fund non-statutory but critical elements of service.

Also see comments on Community Safety Hub and Volunteers above.

#### 4.4 Control room

We note the acknowledgement that the Norfolk Fire and Rescue service already uses ‘...smarter call handling and despatch technologies...’ compared to the police service.

We also note the acknowledgement that the Norfolk Fire and Rescue Service are, with four other fire and rescue services, putting in place a new and ambitious project that will see a new resilient and cutting-edge control system that provides greater resilience. This is funded by a £7.2m Government grant. The scope already includes incorporating the MAIT system. The plans to co-locate the fire and rescue and police control rooms at OCC in Wymondham are also well progressed.

It is very difficult from the information in the business case to understand what has been assumed and is being proposed in relation to the control room. The document says the proposed model “...does not anticipate merging the control room teams”. But, it then goes on to say that there will be savings ‘...through redeployment and reducing vacant posts over an extended period of time...’, and that there will be ‘...capability for the control rooms to share resource’ and ‘...reconfiguration of management roles’. These appear to be mutually exclusive positions – and could cause staff uncertainty. We cannot understand how the level of proposed saving set out in Appendix A - £1.483m – could be delivered, particularly given that introduction of MAIT is already due to be delivered for the East Coast and Hertfordshire Consortium, which includes Norfolk Fire and Rescue.

In addition, the FAQs published by the OPCC now acknowledge that an integrated control room is not practical. It goes on to say that it is co-location of the teams which will allow the teams themselves to drive developments and joint working.

The two elements of the claimed £1.483m saving for the control room under option 3 are attributed to introducing MAIT and integration of roles. Given that there are already plans to introduce the MAIT system, the OPCC acknowledgment that integrated teams is not possible, and also given that co-location is already being progressed through a continued commitment to collaboration, there does not seem to be any benefit that could be attributed to a change in governance. Therefore we cannot see how the claimed saving could be delivered.

#### 4.5 Co-location and joint responding



We are concerned by some of the proposals and assertions made in this section about potential changes to front-line activities and emergency response. Anything that we introduce is preceded by a full assessment of the potential risks and benefits, particularly in the context of the statutory Integrated Risk Management Plan (IRMP) that drives the way the service is organised, and is first subject to public consultation. It is important that changes are made based on an assessment of risk and impact, and can deliver safer communities, and not because they may deliver a saving or efficiency. The proposals in the business case have had no such assessment.

The diagram in Figure 19 does not include two of the existing Fire stations. The PCC and OPCC have confirmed during the consultation period that these stations were omitted in error, and we have been able to communicate this message to our staff. However, we are concerned about how such a fundamental error was made in such an important document. We are also concerned that this error has not helped in terms of understanding exactly what it is that is being proposed and it does cause us to question the veracity of other assumptions that underpin the business case.

We disagree that a change in governance would enable a programme of joint stations to be put in place more quickly just because the PCC would control the assets. It will still be for the Chief Constable and Chief Fire Officer to make operational decisions, and that includes deciding on the location of fire stations. Any decisions on fire estates would also continue to be governed by the IRMP – mindful of the need for fire crews to reach any incident within a set time period.

The location of fire stations is determined through a rigorous assessment and evaluation as part of the IRMP process, taking into account local need and risk. It is on this basis that decisions are made, and not to enable delivery of savings.

We would question any assumption in relation to a programme of joint stations and that it would be possible to create ‘financial benefit by freeing up resources’. We must recognise the reality that there are practical and budgetary limitations to very close collaboration e.g. in terms of roles. For example, over 80% of the Fire and Rescue Service’s stations are crewed solely by on-call (retained) firefighters. This means that other than training, they are only called in to work when it is essential (where there is an emergency) and are paid on this basis. This is not free resource that is sitting around waiting to be called out.

The business case correctly highlights that we are planning to introduce lightweight 4 x 4 vehicles at five retained stations as a replacement for the 2<sup>nd</sup> fire engine. This is a significant decision that has had to be carefully and rigorously assessed to make sure we are confident that it will meet local community risks. There will continue to be full-sized fire engines in those stations to ensure continued capability to respond to fires and larger incidents.

The business case appears to argue for putting unspecified lightweight vehicles at eight stations. Once more there is a lack of clarity in the business case as to whether these vehicles would be additional to those already in place at these eight stations or replace existing vehicles.





If the vehicles are in addition, there will be an additional cost. Because these stations are crewed by retained firefighters who are only called in when needed, there would continue to be the same resource requirement. Therefore, there would be no saving possible for the service.

Conversely, if the new vehicles are intended to replace an existing vehicle, i.e. a smaller vehicle at a lower cost, we assume that there would no longer be a full-size fire engine in those stations, which will significantly impact on the ability to provide a resilient and effective emergency response and mean it will take longer to attend some incidents with all the appropriate equipment to hand. So there may be a modest financial saving but at an unquantified risk to public safety and the safety of our firefighters.

In addition, the business case also says that this type of approach is useful in 'urban areas and inner cities', but the diagram at figure 19 shows that the proposal for these small vehicles is in very rural areas only. Therefore, we cannot see how the intended benefits could be realised – and it again represents a basic lack of understanding about the role, and dangers faced, by the fire and rescue service.

Introducing lighter vehicles as a way to achieve smaller crews, and therefore reduce the cost of response, is a significant decision that needs to be carefully weighed against risk. The proposal does not appear to have done this and seems to suggest this approach on the basis that it will generate savings.

It is very unclear what is being proposed in relation to the location of lightweight vehicles. Appendix A states the financial assumption is that the five lightweight vehicles already being introduced will be delivered, along with a further three, giving a total of eight. However, the diagram at figure 19 does not show the areas where the five planned vehicles are being introduced. It identifies a further eight stations where lightweight vehicles could be introduced, making a total of 13 stations (not 8).

If the proposal is for an additional eight stations (so 13 in total) to have lightweight stations, and this also means removing full size fire engines, there will be a significant reduction in capacity of close to 20%. This would represent an unacceptable level of public safety risk.

The use of 4 x 4 vehicles being introduced by the fire and rescue service does not appear to have been understood. It is not intended for these vehicles to provide the immediate front-line response to emergencies, and they will be used to call in additional resource or capability at incidents. We will continue to send full size fire engines to emergencies as they have the resources and equipment needed to address a range of emergency incidents. It can be difficult to determine the nature and size of emergency incidents before arriving on site and they can often present as more serious or complex than anticipated. That is why it is important to ensure that we respond with appropriate capability first time.



There is also a proposal to open a new joint Police and Fire station in an area of Norwich (Broadland Gate). This area is already covered by a new and modern station (at Carrow), along with the existing station in Sprowston.

It is unclear how the new station would be funded, but if it were crewed with whole-time firefighters that would introduce a new annual revenue cost of around £1.1m. Any changes to our emergency response would need to be risk assessed as part of the statutory IRMP process and the proposal for a joint station at Broadland Gate has not been fully assessed through this process. The Fire and Rescue Service did discuss the possibility with the Police of a joint station at this location and, as part of these initial discussions, identified that it is unlikely to be suitable in the context of future housing growth and development in the area.

There are also other suggestions for how ways of working could be changed. The PCC's office and their consultant have themselves acknowledged that these are ideas only and further work would need to be carried out to consider the business cases for each of these changes. Therefore, any associated savings or efficiencies cannot be relied on in terms of considering the business case and potential benefits – the claimed benefits remain highly speculative.

We have already introduced joint fire and police stations in three locations, and have plans for three more. We also already have a joint HQ in Wymondham and well progressed plans for a co-location control room.

The business case suggests a 'floating resource' model could be introduced. This is already in place. The fire and rescue service has a team of seven retained support officers that provide a roving resource that can address any short-term operational deficiencies. The service also has Retained Support Volunteers (RSVs) where on-call staff can provide availability for stations where there is a known deficiency.

It is correct that the Fire and Rescue Service is not charged for rent at the HQ in Wymondham. Under the same principle of joint working and collaboration, the Police Service is also not charged for their use of the fire and rescue fleet workshop at King's Lynn. This demonstrates the real progress on collaboration made by both services.

#### **4.6 Resource planning**

Again, it is difficult to determine in this section exactly what is being proposed, and how a change in governance arrangements would help to deliver it, given that both services will continue to be led by the separate chief officers.

It is unclear what is meant by the comment 'these roles could help free up front-line firefighters to work where they are needed, crewing fire appliances and engaging with the public to prevent fires and other emergencies'. Our front-line workforce is already focussed on these activities – this is their role. They are not required to carry out non-critical tasks that they need to be 'freed up' from.

We already actively plan our workforce and, where the Home Office guidance permits, we open up non-uniform vacancies to staff who have retired. We also already have a strong approach to ensuring that staff on restricted duties are fully occupied with other activities as part of their return to work process.

#### **4.7 Commercial revenue and training**

The Council is committed to operating more commercially. We want to make sure that it does so in a way which meets the desired financial outcome, including making money or fully covering overheads. This means identifying and meeting clear targets for trading entities' profit, return on assets, and return on investment, as well as making sure internal activities such as contract and establishment management are run effectively to eliminate financial waste.

Under our Norfolk Futures programme, one of the seven priority workstreams is commercialisation and work is well progressed on the following key areas of focus:-

1. Improving the return on existing assets and the return on investments;
2. Making the Council's trading functions more profitable and charging fully (including overheads) where the charging framework is set out in statute;
3. Implementing a more business-like approach to managing our services.

The scope of Safer Norfolk (the CIC) is determined by the Articles of Association. As acknowledged in the business case, the CIC is providing a surplus that can be used to support community safety activities.

The principles outlined in 4.7 are indeed laudable but it is important to remember the primary focus of each service is not to make money but keep Norfolk safe.

#### **4.8 Other potential benefits in support services**

We generally support sharing of processes, ways of working etc. and are happy to continue to progress these through collaboration.

We are concerned about any proposals to reduce back office and support staff within the Fire and Rescue Service. Appendix A indicates an assumption in the proposal of a removal of two posts (2 ftes) through a reduction in 'administration'. We find it impossible to believe that these posts could be saved from within the Fire and Rescue, and so we assume that they will provide a saving from, and therefore benefit, the Police Service budgets.

The support service posts within the Fire and Rescue team are essential to keep the service running as efficiently and effectively as possible. We have a lean structure and have already delivered significant efficiency savings. We do not believe it will be possible to reduce this capacity any further without impacting on front-line service delivery.



In terms of context, the ratio of support staff as a % of total workforce in Norfolk Fire and Rescue Service is 9.85%, compared to a national average of 17.17%. There are just five other fire and rescue services in the country with a lower ratio. This is in the context of an increasing number of incidents (no reduction in workload), demonstrating the efficient approach already being taken.

## **D Commercial Case**

### **5.1 The purpose of this section**

No comments.

### **5.2 Overview**

We do not believe that the commercial case has been proven.

The business case does not appear to take account of the need to transfer vehicles or plant in the event of a change in governance. These are critical to front-line service delivery.

### **5.3 Estates**

Whilst the PCC has given assurance that no fire stations would close, the FAQs published by the OPCC make it clear that an exception will be where “...there is an opportunity to develop a new joint facility in the same location”. It is unclear what “same location” could be defined as, and the buildings could be several miles apart. This is concerning. The location of fire stations needs to be based on an assessment of fire and public safety risks and not on savings or proximity to police assets.”

The County Council has already provided information about estates to the OPCC. There is an established history of colocation and joint working between the County Council, Fire and Rescue and the Police; the PCC has not made any case as to how the new proposals would improve this situation. Through the County Council there is a dedicated team who understand the requirements of Norfolk Fire and Rescue and have had a history of delivering successful capital projects for them. In comparison Norfolk Police’s property function is shared with Suffolk Police, covering a large and diverse Police estate. It is unclear how savings will be made and how the quality of service will be maintained.

We have been clear that it is only buildings and land that directly relate to operations that will be transferred in the event of any change in governance, and any surplus land or buildings will be retained by the County Council.

In addition, given that the County Council already has a programme of asset rationalisation underway, we would also intend to retain the freehold of any sites with possibilities of co-location.



Therefore, we do not believe that the claimed £3.784m is deliverable, or at least in a way that could benefit the fire and rescue service.

#### **5.4 Human resources**

Formal agreement has been signed to enable West Yorkshire to deliver administration of the Firefighters Pension Scheme 2015.

Whilst it is noted that there is no intention for compulsory redundancies, it is also noted that the business case is predicated on a reduction in resource levels and does not take into account County Council corporate support services (see 3.5 above). To deliver the financial savings claimed, it may be necessary for compulsory redundancies.

#### **5.5 Information and communications technology (ICT)**

Changes in ICT systems and software need to be carefully planned, managed and implemented to ensure changes do not impact on operations. A number of changes are proposed and this could take significant resource to achieve. The transition costs for ICT systems in Appendix A seem to be understated and cover just accounting and payroll system changes, and do not seem to take account of the complexity and number of existing systems that would need to be changed or addressed.

#### **5.6 Finance team**

No comments.

#### **5.7 Procurement and commercial contracts**

In relation to contracts, the business case says that the current arrangements for most contracts would be able to continue if a change in governance is progressed.

It also says that the existing Police contracts are 'joint' contracts with Suffolk PCC/Constabulary. It goes on to say that including fire requirements in these contracts may not always be possible and advice would need to be sought on a case by case basis.

The claimed efficiencies from procurement are based on rudimentary calculations e.g. that 5% of a spend category could be saved. But, there is no practical assessment of whether this would actually be possible e.g. no analysis of whether the current prices could benefit from aggregation of arrangements, or whether there are valid operational reasons that would not enable aggregation e.g. the need for different protective uniforms. This also assumes that collaborative and joint purchasing doesn't already take place.

There is no certainty that it will be possible to join up contract arrangements and deliver the financial benefits associated with this as set out the business case. This means the £1.12m claimed benefit from purchasing economies of scale is speculative and may not be possible to deliver.



## **E** Financial Case

### **6.1 The purpose of this section**

No comments.

### **6.2 Overview**

The conclusion in the business case that a new organisation is affordable and sustainable based on current government funding projections and share of council tax to be transferred is not evidenced in the business case. There is considerable uncertainty as to the level of future government funding levels after 2019-20 which is subject to a Spending Review and future funding levels have not yet been announced. We have not seen any evidence to lead us to believe the change will be affordable or sustainable – in fact we think the opposite.

The business case incorrectly states that County Council provided a financial solution. In fact, the County Council provided information requested by the OPCC and their consultants, but many of the assumptions then made within the business case were not agreed with the County Council. To say the County Council provided the financial solution or confirmed assumptions is misleading.

The level of council tax assumed in the business case is higher than the amount that would be provided by the County Council to the OPCC. These were not the figures the County Council provided.

If the proposed transfer proceeds, all financial assumptions would be subject to local negotiations and agreement. However, this is from a starting point where the County Council does not agree.

There can be no certainty that the amounts assumed in the business case would be agreed by the County Council and therefore this impacts on the claimed financial viability. This is especially true if the government continues to reduce the amount of grant funding it provides for local authority services, which would impact directly on a ring-fenced Fire and Rescue Service budget. The current Revenue Support Grant is being replaced from 2020/21 and the impact of this is also unknown.

### **6.3 Funding NFRS**

#### *6.3.1 The Methodology*

We note that the CIPFA guidance relied on is draft.

The County Council does not agree with the proposed methodology in the business case. The County Council supplied the OPCC and consultant with information provided





by the government to the County Council and does not agree with how this has been used.

The methodology used in the business case seeks to transfer financial risk to the County Council by understating the amount of Revenue Support Grant that is provided by the government for the Fire and Rescue Service, and overstating the amount of council tax. This is unacceptable.

### *6.3.2 Establishing the NFRS budget*

As set out in 6.2 above, the County Council did not confirm assumptions made in the business case.

### *6.3.3 Key differences*

See comments at 6.2 above.

### *6.3.4 Minimum Revenue Provision (MRP) holiday*

We do not agree with OPCC's view of MRP set out in the business case and therefore do not agree with the associated affordability calculations.

### *6.3.5 Savings*

The £874k figure quoted is simply a planning assumption which is made for all Council services. It is a pro-rata share of the total 2019/20 budget shortfall that the County Council needs to address and is used for planning purposes only.

In practice, any proposals for service changes or reductions are subject to public scrutiny through the annual budget process and decisions are ultimately made by the County Council in February each year. As we do every year, the County Council is currently planning for its budget for next year. At this stage, no decisions about savings or changes in the Fire and Rescue service have been made.

Like all parts of the County Council, the Fire and Rescue Service seeks to identify opportunities for efficiency savings each year to mitigate the impact on Government funding reductions. In the last three years, the service has delivered £1.227m of savings without any changes in resilience of the service. In the same period, the service benefitted from funding increases of £1.484m for pressures such as inflation, the introduction of the National Living Wage, as well as capital investment.

It is interesting that the business case does not accept the County Council's planning assumption and has chosen not to include any savings in the baseline savings transfer on the basis that '...savings decisions should be those of the PCC and not Norfolk County Council'. Surely it does not matter where any saving decision is made, just that the saving is deliverable and does not impact on the resilience of or the service or public safety. In any event, the County Council has not yet made any decisions about new budget savings in 2019/20 for any services.



### *6.3.6 Cost pressures*

One of the key benefits of the fire and rescue service being part of the County Council is that it can use its significant budget to spread financial pressures. In practice, this means that we are able to re-prioritise spend and activity to ensure that critical activities can continue to be developed. Including water rescue – see comments at 4.3 above.

### *6.3.7 Revenue budget of NFRS*

No comments.

### *6.3.8 Funding allocation*

This financial position has not been agreed with the County Council and, should the proposal proceed, will be subject discussion and local agreement, and therefore could change.

### *6.3.9 Future funding risks for the PCC*

As mentioned in 6.2 and 6.3, the Medium Term Financial Plan is based on assumptions that the County Council does not agree with.

## **6.4 High level Medium Term Financial Plan (income and expenditure)**

See 6.3.9 above.

It is also notable that none of the proposed efficiencies have been reflected in the Medium Term Financial Plan which highlights a concern about their robustness and the confidence that they can be delivered. Also see comments at 3.2.1 above.

## **6.5 High level Medium Term Financial Plan (capital programme)**

The business case proposes, following any transfer, to review the capital programme and develop a revised funding model. This puts at risk the Fire and Rescue Service improvements that the County Council has already deemed to be operationally necessary and has committed to fund and implement.

In 2018/19, the County Council has already committed £5.347m of capital funding to the fire and rescue service, and we have fully funded plans to deliver a further £3.6m investment over the next two years – making a total planned investment of £8.947m.

This will mean:-

- 20 new fire engines
- A replacement aerial ladder platform
- 800 new specialist protective uniforms
- Replacement fire training towers



- Critical equipment, including hydraulic cutting gear, ladders and breathing apparatus
- New technology, including ICT equipment and mobile data terminals

There does not appear to be any future investment plan set out in the business case e.g. to invest in fire stations, vehicles, equipment etc. Any delay in this programme could have safety implications on the public and on firefighters themselves.

## **6.6 Balance sheet**

We agree that the illustrative balance sheet reflects information provided by the County Council and if the transfer proceeds would be subject to change and local agreement.

As stated in the business case, the transfer of pension liabilities between organisations is complex. As this work has not been completed, it is unclear what impact this would have on the financial viability of the business case.

Transferring Local Government Pension Scheme liabilities from a larger organisation (County Council) to a smaller one (OPCC) is likely to impact on the actuarial assumptions and could result in an increase in the employer's contribution rate which would need to be funded by the Fire and Rescue Service.

In future any further increase in costs as a result of the triennial actuarial valuation will have to be funded solely by the Fire and Rescue Service and the service would be unable to benefit from the County Council's economies of scale and ability to allocate its total income to protect priority services.

## **F Management Case**

### **7.1 The purpose of this section**

No comments.

### **7.2 Overview**

We note that work will begin following transfer to "...realise the ideas set out in the business case...". We agree that these are just ideas, and have concerns about the weight that may have been placed on these in the business case given that they are essentially untested and unverified. In practice, it may not be possible to achieve any of these. Also see 4.5 above.

### **7.3 Governance and project management arrangements**

No comments.

### **7.4 Business case development process**



The opportunity to be involved in the development of the business case was welcomed.

However, we would point out that the majority of our involvement in development was as part of unstructured discussions focussed on theoretical possibilities. We cannot see that they were followed up with technical assessments or consideration of other evidence available. These are just untested and unstructured ideas.

## **7.5 Transition management**

No comments.

## **7.6 Implementation timetable**

Taking into account the process and timescales for the PCC's proposed change in governance in Hertfordshire (where the position is similar to Norfolk), the timescales and the ambition for a transfer on 1 April 2019 do not appear to be realistic.

## **7.7 Transition planning assumptions**

See comments on 7.6 above.

## **7.8 Implementation post transfer**

No comments.

## **7.9 Stakeholder engagement**

No comments.

## **7.10 Public consultation**

No comments.

## **7.11 Risk management**

We have noted the detailed risk register included at Appendix E. We have some specific comments on some of these risks, as follows:-

- OPCC10 – benefits stated in the business case are overstated  
We do not agree with the commentary and risk score. Given the lack of evidence or assessment of some the changes proposed – in particular those that are not clearly articulated and are difficult to understand – we find it hard to believe that the risk score is so low. We also do not find any evidence to support the mitigation that 'benefits and assumptions are conservatively stated...'. Our view is that this risk should be score as 4 – high and severe.
- OPCC11 – Local Authorities do not agree with the case for change, triggering the independent assessment process



It is not clear why this risk has been given such a high score. Whilst it is possible that an independent assessment process could be triggered, this should be seen as a positive intervention that could offer an independent view on the proposals, and therefore give greater reassurance to the public.

In addition, we feel that four key risks are missing from the risk register:-

- The impact that the possible disaggregation of the Norfolk Fire and Rescue Service from the County Council could have on other County Council services. There is extensive collaboration with other services in the County Council. There are also a number of unquantifiable benefits of the service continuing to be part of the County Council that come from being part of the same 'family' and would erode with a change in governance. This includes shared policies and procedures and sharing skills and experience easily across a wide range of services. See page 31 for further details.
- The business case fails to consider potential unintended consequences and the impact of any transfer on the County Council and the wider system. For example, separation of a Fire and Rescue precept would have a direct impact on the Council's ability to raise additional funding through any future adult social care (or similar) precept on council tax. Reducing the County Council's Band D tax amount would therefore limit future amounts that could be raised to fund vital services such as social care.
- The increased risk to the Fire and Rescue budget that arises if they are no longer part of the County Council, and therefore could no longer be protected from any reductions in funding levels.
- The capacity of the organisation to deliver change. The business case sets out details of additional technical resource that may be commissioned to support any transfer. However, it does not capture the existing internal resource that would need to be diverted from other activities to support any transfer – from the Fire and Rescue Service and the wider County Council. We anticipate that significant resource will be needed, particularly as disaggregation will not be straightforward.

## **7.12 Benefits management**

No comments.

## **7.13 Equality impact assessment**

As the initial Equality Impact Assessment has not been published we are unable to comment on it.

In respect of a change in governance, we would not anticipate that there would be any potential inequalities or disproportionate/detrimental impact on people with protected characteristics (including staff), provided that any changes was carefully managed.



In respect of changes to operational response, including changes to fire stations, fire vehicles and other front-line ways of working, these changes could have a disproportionate and detrimental impact on people with protected characteristics. Because these changes are unquantified they cannot be fully risk assessed and it is not possible to determine at this stage the extent of this potential impact.

#### **7.14 Legal review**

No comments.

### **4 Why we think Norfolk County Council should continue to run Norfolk Fire and Rescue Service**

- Norfolk has an efficient, effective and economically viable Fire and Rescue Service
- We have a strong and productive track record of working together with Norfolk Police (including a shared HQ, joint fire stations, co-located teams and sharing resources) – and plans to do more.
- Efficiencies are always possible and this is part of our approach to everything we do.
- As part of the County Council, Fire and Rescue budgets have been protected from the full impact of budget pressures. Front-line services continue to be modernised and compare well with others.
- We operate from 42 fire stations. Our risk assessments, and the public, tell us these are much needed and valued. We will continue to protect these.
- We have made - and will continue to make - significant investment in the service to ensure it has the modern equipment and facilities it needs to operate effectively. We are purchasing 20 new fire engines, 800 new protective uniforms and more specialist equipment. We have joint procurement arrangements with other fire and rescue services.
- The service is held to account at a community level by 84 representatives on the County Council, elected by Norfolk people, in meetings held in public.
- The Fire and Rescue service already has control of its budget and operations. The budget provided to the Fire and Rescue service is used only for Fire and Rescue.





- The Fire and Rescue service, as an integrated part of the County Council, contributes to a broad range of services through shared agendas and outcomes, including Public Health, Adult Social Care and Trading Standards in particular.

## **5 Risks and dis-benefits of Norfolk Fire and Rescue Service no longer being run by the County Council**

- The service would no longer receive financial protection from the County Council. Therefore, the service would need to directly address any funding reductions or pressures from the Fire and Rescue budget, whereas now these can be met from elsewhere in the County Council.
- The unquantifiable benefits of being part of the same organisation as the rest of the County Council would quickly erode, and would be lost. The County Council is a large and complex organisation and it simply isn't possible to replicate or continue these benefits whilst no longer part of it. The current benefits include:-
  - Being able to work together and direct resources more easily.
  - Building up relationships and contacts – and being able to call on those people to get things done. The reality is that if you work for the same 'company', it is much easier to get things done together as you don't need to ask for permission.
  - Benefiting from shared policies, procedures and ways of working. Being part of a large organisation gives means there is almost always someone who has experienced a similar problem who can help, so we don't need to keep reinventing the wheel.
  - Able to share information/data more easily with each other, and more quickly.
  - Sharing skills and experience with others – just attending the same corporate training sessions means that the Fire and Rescue service and other parts of the County Council come into contact in a way that would not happen during the course of a normal day, and really does help to make connections and improve our overall service delivery. It helps tap into insight from all levels across the organisation, not just at the top.
- Removing the service from the County Council will impact on the level of funding for other services. In particular, the total possible adult social care precept on Council Tax would be lower because it is based on the Council's total budget – and removing the Fire and Rescue Service means the overall budget would be lower. This means the amount of funding that can be raised for the already overstretched and under pressure adult social care budgets would be lower.