

Item 1

Appendix A

**LGA's Fire Services Management Committee's response to the Fire
National Framework Consultation**

Introduction

1. The Local Government Association (LGA) is a voluntary membership body and our member authorities cover every part of England and Wales. Together they represent over 50 million people and spend around £113 billion a year on local services. They include county councils, metropolitan district councils, English unitary authorities, London boroughs and shire district councils, along with fire authorities, police authorities, national park authorities and passenger transport authorities.
2. The Fire Services Management Committee represents, as an LGA body, the views and concerns of the fire community in relation to the fire services modernisation agenda. It ensures that local circumstances have a voice in the national context.

Our response

3. The Fire Services Management Committee welcomes the opportunity to comment on the proposals for the new National Framework and the strategic governance arrangements for national resilience.
4. The LGA has contributed to the development of the National Framework and considerable progress has been made in capturing the new relationship between central government and fire authorities. Although the general direction is positive in our view, there is still scope to reduce the level of direction and requirements.
5. We welcome the remarks made by the Fire Minister Bob Neill MP, in the foreword to the draft National Framework, in particular the recognition that "the best thing central government can do to improve the services provided by fire and rescue authorities and the professionals they employ is not to micro manage from the centre, but to provide an overall strategic direction and support, to empower and encourage them but not to interfere in the way in which they serve their communities".
6. We also welcome the Government's strong statement on its own responsibility for national resilience.
7. However, there are a number of areas where FSMC would like to see clarification and/or amendment.

Item 1

Resilience and risk

8. Fire authorities are very comfortable with the requirements of collaboration and intra and inter operability. However there is a concern in the sector that the basis for the risk analysis set out in the proposed National Framework is drawn very broadly, particularly as it relates to risks outside an authority's geographic borders (paragraph 1.3 in the consultation document). Greater clarity is required on the expected scope of the risk assessment. The assessment of risk should be based on all reasonable fire authority risks.

Strategic governance arrangements

9. The supplementary letter from DCLG and CFA sets out a proposal for the new strategic governance arrangements for national resilience. The governance arrangements are a very significant issue and should be incorporated into the National Framework document, and consultation, rather than being the subject of a separate process. On that basis we are commenting on the strategic governance arrangements as part of this consultation response.
10. We recognise the need for a strategic body to oversee national resilience issues. The current National Resilience Forum does excellent work, but it does not perform a strategic role. However, in establishing a strategic body it is essential that it has formal membership (rather than visitation rights) from across Whitehall, so that resilience can be considered at a strategic level across all category 1 and 2 responders.
11. It is very important that the strategic governance body has elected member involvement and we would like to see greater representation from FSMC.

Scrutiny

12. Fire authorities, and more generally local government, has been, and is, open to scrutiny. There is no single model of scrutiny and so it is to be welcomed that the proposed National Framework is not prescriptive on this matter. Each fire authority comes to its own arrangement on scrutiny and, as the new National Framework implies, it for local communities to judge the appropriateness of those arrangements. However, local government is not complacent on this matter and the LGA will continue to support authorities on this issue as required.

Item 1

Improvement support

13. There appears to be a fundamental misunderstanding of the concept of improvement support within the proposed new National Framework. Peer supported improvement programmes, such as the LGA's well respected peer review and challenge programmes, are primarily forward looking. They are an aid to unlocking future potential rather than an audit process or a form of intervention (see paragraph 4.3 of the proposed new National Framework). The peer review process has always been voluntary and will remain so. The LGA has always encouraged councils and fire authorities to publish the peer reports, but this has been, and should remain, a decision for individual authorities. Paragraph 2.9 of the proposed new National Framework should be amended so that the requirement to publish peer reviews and self-assessments is removed.

Annual statement of assurance

14. The requirement for an annual statement of assurance (paragraph 3.2 of the proposed new National Framework) needs further clarification. There could be merit in this proposal if it means a consolidation of existing reporting requirements and a reduction in the burden of reporting. However, if the requirement is for an additional publication over and above existing reports such as annual financial reports then this must be seen as duplicative and unnecessary. We ask that DCLG clarify its expectation about the annual assurance statement in advance of any decisions on this proposed requirement. In any event we do not think that a template is required as this should be left to individual fire authorities.

Conclusion

15. Overall our view is that this is a much improved National Framework and this has been achieved through the engagement with the fire sector. The comments in this response should be seen in that context.
16. We would welcome working with you further on the detail of the new National Framework in the coming weeks.