



NFCC
National Fire
Chiefs Council



Appendix A

Fire spending review proposal

Collaborative LGA and NFCC submission for SR2022

Cllr Ian Stephens (Chair, LGA Fire Services Management Committee) and
Mark Hardingham (Chair, National Fire Chiefs Council)

Collaborative LGA and NFCC submission for SR2022

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Introduction

This document represents the fire sector request for funding to inform the Spending Review 2021-22. It has been developed in collaboration by colleagues in the National Fire Chiefs Council (NFCC) and Local Government Association (LGA) and will focus on three key elements:

1. The base case for Fire and Rescue funding and productivity opportunities
2. Significant cost pressures
3. Improvement activity arising from the Grenfell Tower and other Recommendations

These elements are well aligned with the ministerial priorities of People, Professionalism and Governance.

Her Majesty's Inspectorate of Constabulary, Fire and Rescue Services (HMICFRS) State of Fire Report identified that Fire and Rescue Services (FRS) funding position and pressures vary widely, with a small number of services struggling to meet operational requirements, while also acknowledging there is a financial disparity across the sector. Given that the process for establishing a new Fire Funding Formula has been paused and is not covered in this proposal, changing referendum limits to allow Council Tax precept flexibility of £5 for all FRS is the only viable option for addressing systemic local funding issues. It should be for local areas to decide how local services are paid for and the LGA has consistently opposed nationally set referendum limits.

As a short-term measure, the Home Office must also consider the provision of one-off 'Special Grant' funding for services that have acute financial difficulties and that, without this support, could result in either a financial or operational failure.

SR20 and SR21

For SR20 a joint LGA and NFCC submission was produced, which amongst other items covered:

- Efficiencies – delivering collaborative procurement and delivering technological improvement
- Productivity – capacity to deliver increased fire prevention and protection activity, and the impacts and outcomes

For SR21 the LGA and NFCC have built on this work by:

- Updating the SR20 submission with the latest data
- Undertaking an FRS wide survey of efficiency and productivity across several areas such as shared estates, sharing of collaborative roles, reductions in headcount, fire stations and appliances and the number of fire safety audits undertaken. The survey identified lots of areas of good practice, but further highlighted the gaps in national data collection, reinforcing the need for improved coordination at a strategic level.

The sector is in the process of establishing a productivity and efficiency group, which will look to replicate the objectives of the Efficiency in Policing Board, namely:

- improving the evidence base on productivity improvements and efficiencies delivered in recent years and the scope for further gains
- developing a mechanism for collating information on ongoing productivity and efficiency plans and identifying those from which the wider sector might benefit
- sharing, or encourage sharing of, information on productivity and efficiency improvement work

- developing a reporting framework to enable monitoring and verification of progress in delivering productivity and efficiency gains
- supporting the delivery of productivity and efficiency gains by identifying barriers and enablers, seeking solutions to overcome the former and options to maximise the benefit of the latter
- coordinating with other governance structures to ensure that understanding of productivity improvements and efficiencies is embedded within broader work around investment, outcomes and demand.

It is also proposed that every service will produce a productivity and efficiency plan, covering the three-year SR period, similar to the efficiency plans previously required but expanded to also include progress on improving workforce productivity. These will be supported via the newly created NFCC productivity and efficiency group.

1. The case for Fire and Rescue funding – baseline funding should be increased by the rate of inflation each year to enable FRS to maintain workforce numbers

Notwithstanding the lack of focus, a decade of austerity measures has had significant impact on fire and rescue services (FRSs) under all governance models. As some FRSs are in embedded governance models such as county councils and are part of a wider budget where data can be inconsistent and not easily disaggregated from the wider council budgets, figures quoted here are for the 29 standalone Fire and Rescue Authorities. In 2009/10 core spending power was estimated at £1,523m, falling to £1,413m in 2021/22, equating to a cut of 34% in real terms.

FRS capabilities are built around our people. Staff costs make up a large proportion of budgets and therefore it is inevitable that staff numbers have declined whilst services have had to make cuts, with full time equivalent firefighter numbers declining from 41,201 in 2010/11 to 32,171 in 2019/20, a fall of 22%.

Despite this, Her Majesty's Inspectorate of Constabulary, Fire and Rescue Services (HMICFRS) found in their 2018/19 State of Fire report that the sector is generally effective in responding to fires and other emergenciesⁱ. This shows the sector's ability to maintain its core response services with the staffing levels at that time. The picture is not the same for Fire Protection (fire safety audit of buildings), a vital part of integrated service delivery and risk reduction.

The Inspectorate, and the sector, have identified a number of areas for improvement (which will be covered later in this report) but it is likely that the level of improvement will be restricted if staff numbers are reduced further due to a) needing a base of resource to respond to risk and b) needing the capacity to deliver improvement activity.

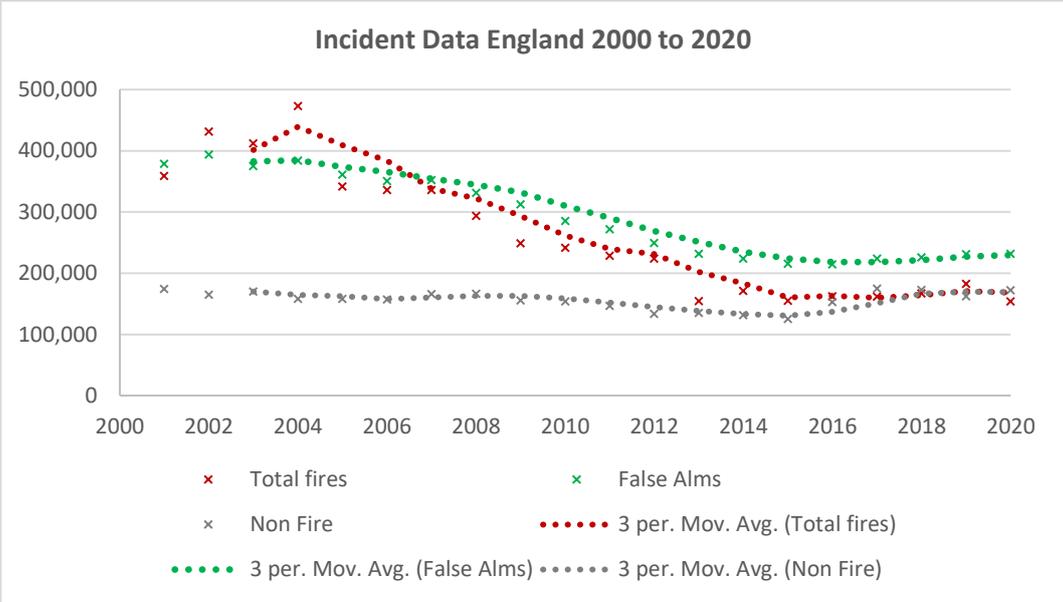
1.1. Resourcing to Risk

Unlike some public services which are demand led, we need to have enough resources available to provide an emergency response even in times of exceptional demand. This includes the ability to deal with large scale emergencies and/or a range of smaller incidents but all occurring simultaneously and/or incidents that are of extended duration.

This resilience is vital for our communities and in ensuring safe systems of work for our people, enabling cross-border working (such as that seen in recent wildfires and flooding incidents such as the Whaley Bridge dam collapse) and significant support for other agencies during the COVID-19 pandemic. FRS are needing to plan, train and respond to an increasing number of

weather-related incidents such as flooding and wildfire and these risks are likely to increase due to climate change. The LGA and NFCC would welcome a review of Fire and Rescue Statutory duties to include response to flooding. Whilst many FRS have some capability to respond to these incidents, support for a consistent approach based on risk is needed and would require a capital investment similar to that made by the Welsh Government.

While over the long-term incident numbers are down, there is evidence that this trend has started to plateau, demonstrating the need for continued resourcing for both service response and preventative activities.



Cutting firefighter numbers further at this time would compromise FRS ability to meet the inherent risks that we face and have a negative impact on the sector’s aspiration to create a more diverse workforce that can better represent the communities they are working with.

The benefits of a diverse workforce are well documented; engendering trust by representing the communities we serve, creating positive culture, removing barriers to potential recruits and bringing diversity of thought to planning and decision making. Developing a workforce for the future is a key area of reform for FRS and high up the LGAⁱⁱ and NFCC agendaⁱⁱⁱ. We need to do more to support staff and improve culture, progress towards which will be inhibited if there are a lack of resources to properly meet the challenges of the future.

Initial analysis of response times when compared to firefighter numbers has shown significant correlation between a reduction in English firefighter full time equivalent (FTE) and slower response times, since 2009^{iv}. This data suggests that a further reduction in FTE firefighters of approximately 6,000 England-wide corresponds to an increase in average response times of 30 seconds^v. Whilst this correlation does not directly indicate the cause of slower response times which may be impacted by factors such as traffic, funding pressures have resulted in greater use of On Call (part-time) staff which inevitably slows response. There are inherent risks with the On Call model of resourcing as FRS are struggling to maintain reliable response due to the appeal of the role, commitment required, financial reward and changes to lifestyles and primary working arrangements reducing availability of On Call staff. There are significant differences with how the system works across England, with some FRAs concerned about the future of the on-call system, and some experiencing a good availability of staff. Therefore, more work is necessary to see how we can ensure that the system can be sustainable for everyone into the longer term. During the early stages of the pandemic, some services

experienced an increase in on-call availability due to an increase in working from home arrangements, and because of some staff being furloughed from their primary employment. Although the furlough scheme is now winding down, depending on the extent to which working from home is sustained over the longer-term, there may be opportunities to attract people who would not have previously considered an on-call role.

The system is fundamental to the provision of fire and rescue services outside of large towns and cities so Government support for a review of the system would be welcomed. However, it is clear that any alternative to the current system would have cost implications and require funding to deliver.

1.2. Resilience in times of crisis

Throughout the COVID-19 pandemic FRS have demonstrated their ability to flex their resources, with minimal additional financial support, to support other agencies and the public in a time of crisis. This is in addition to the ongoing support that FRS give other blue light services; with medical co-responding and gaining entry activity common. Few other agencies have the geographical spread of local resources that FRS do, with good levels of public trust^{vi} which enables support to vulnerable people in our communities. To the end of March 2021 FRS had delivered considerable additional activity as shown in figure 3.

The NFCC, LGA and National Employers have both together and separately evidenced support to individual FRS and national government by leading and co-ordinating efforts, issuing communications, guidance, and agreements as appropriate to assist fire and rescue services to see their way through this national health emergency.^{vii} At times this has included working with partners in other agencies; including nationally with the National Police Chiefs Council and Association of Ambulance Chief Executives, which complemented the local work of FRS through the local resilience forum or similar.

Figure 3 COVID-19 Additional Activity delivery



1.3. Productivity: Capacity to deliver increased fire prevention and protection activity

A significant challenge exists within the sector in that it is difficult to robustly measure productivity and efficiency. This is based on a number of factors including the diversity of local CRMP's, and the varying delivery models deployed across the country. This is compounded further in that consistently measuring these areas of performance has not been a national or local priority for a number of years. Going forward, this needs to be addressed by the sector to ensure appropriate challenge, support and scrutiny can be applied.

We understand that all public services are under pressure to deliver more effectively and efficiently in light of the economic climate and public scrutiny. There are however opportunities to improve FRSs by making incremental improvements within existing resources.

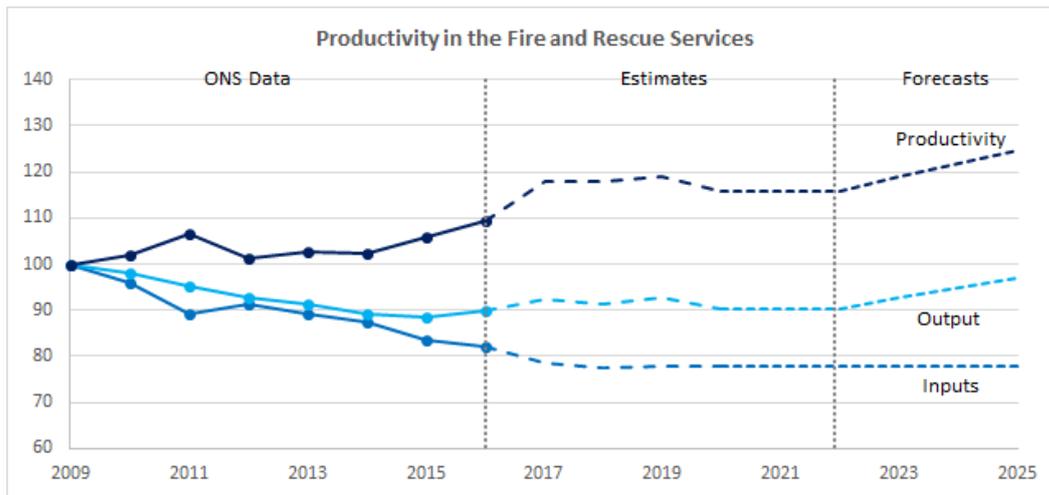
HMICFRS found that many services are under-resourcing prevention and protection and need to make sure their workforces are more productive. Office of National Statistics (ONS) data shows that productivity of FRS has improved since 2009, perhaps inevitably because of reduced staffing numbers.

The ONS data has been extrapolated to reflect changes in staffing numbers to date, and then projected forward based on consistent incident numbers and headcounts, but with FRSs delivering an increased number of home fire safety checks and fire safety audits, therefore showing a continued improvement in productivity.

We know that the number of home fire safety checks carried out by fire and rescue services has reduced by 26% since 2011 and that fire safety audits have reduced by 43% over the same period. We believe that FRS have the capacity to deliver a significant productivity increase within existing resources over the three-year spending review. The illustration below is based on using differently the equivalent of 3% of the wholtime firefighter hours available to deliver an additional 65,000 home fire safety checks (HFSCs) and 18,000 fire safety audits per annum by the end of 2024-25.

FRS already use their station-based staff to deliver targeted fire prevention and protection in their local areas. There is an opportunity to better utilise the fire station-based workforce to conduct more home and business fire safety checks in the community. This would have a positive impact on productivity and morale whilst providing an opportunity for FRS to invest in the development and training of staff. One outcome of having fewer fires to attend has been the need to increase training so firefighters are safe as possible when they do attend emergency incidents. Fire station-based personnel carrying out more routine fire protection work will improve their knowledge of the built environment and free up higher trained inspecting officers and fire engineers to deal with more complex buildings to support the new building safety regime.

These illustrations are used to give a sense of the scale of additional activity that could be achieved, however, it should be noted that there will be varying improvements in productivity not captured by these measures (e.g. educational visits, business engagement events, providing resilience to the on-call duty system etc.). The outcomes of improvements in productivity will be determined locally and captured within the proposed productivity and efficiency plans.



There may be further opportunities to improve workforce productivity by diversifying the work undertaken by staff, in line with 'Fit for the Future'.

1.4. Productivity: impact and outcomes

It is estimated that, in addition to making communities safer and reducing harm from dwelling fires, the 65,000 home safety checks provided as an illustration of potential productivity improvements, would deliver an economic benefit of £127m^{viii}. It is not so easy to identify the direct impact of regulatory fire safety audits and inspections on fires given the very different nature of the sectors that those buildings represent (that range from large hospital complexes to small takeaway food outlets). It is evident that more regulatory fire safety audits will increase the rate at which issues with the built environment, identified through the Government's Building Safety Programme, are able to be addressed. Over the 10 years between 2009/10 and 2018/19 there have been 3,631 fewer accidental fires across England in non-domestic buildings. At 2019 prices, this represents an estimated economic saving to society of £370 million, this reduction is supported by the inspection and enforcement work undertaken by FRS.

Again, for illustrative purposes the outcomes of this additional work would be:

- Reduction in number of fires in domestic premises
- Reduction in deaths from these fires
- Reduction in injuries
 - By targeting specific vulnerable groups e.g. elderly and disabled people
 - Providing community safety checks, like smoke alarm etc.
- Reduction in damage to properties from fires as there are fewer domestic fires and less damage as fires that do happen cause less damage
- Advise wider cross Government policies such as security, crime prevention and health and well-being
- Audits resulting in
 - Eventually, a greater proportion of satisfactory fire safety audits
 - publicity - using media to increase the deterrent effect

1.5. Efficiencies: Delivering collaborative procurement

The NFCC established its national procurement programme in 2015, with individual FRS taking a lead on each category of major expenditure. The programme resources were boosted by transformation grant funding awarded by the Home Office in 2016-17, with the programme expected to deliver savings from collaborative procurement of £27m by 2024-25 and the National Procurement Strategy for Fire published in 2018. As transformation funding was

exhausted during 2019-20, the programme is now resourced by the sector and the national savings register has evidenced savings of £13m.

The Fire Commercial Transformation Programme operates under 3 key principles:

- Standardised requirements: developing agreed standard specifications that are operationally driven rather than procurement-led.
- Aggregated volumes: FRS that bring larger volumes to market typically get better deals. Where possible, i.e. non-fire specific goods and services, consider the wider purchasing power of other public sector organisations.
- Collaboratively managed contracts and suppliers: joined-up strategic engagement, supplier performance and contract management

The programme is therefore on track to deliver the remaining £14m of savings over the spending review period, which will be utilised by FRSs to offset cost pressures.

1.6. Efficiencies: Delivering technological improvement

HMICFRS found that the use of technology in FRS varies considerably, and that whilst there are pockets of innovation the sector as a whole could use technology better. This view is supported by a recent study by Leeds University, which found that the condition of FRS ICT infrastructure differs greatly across England with a number of services facing significant ICT challenges.

It is apparent that in order to deliver transformative technology which will support business operations, promote productivity, operational decision making and service improvement to the public, significant investment will need to be in FRS technological capability. FRS have already identified improvements needed and have incorporated digital transformation into their change programmes, often funded by reserves^{ix} This investment will not be possible if baseline funding is cut and therefore reserves will be required to support revenue budgets rather than make sustainable changes. The NFCC Digital and Data Programme has a role to play in supporting FRS in technological improvement but will not in of itself solve the ICT infrastructure challenges that exist. The Fit for the Future partnership work is also mindful of this and considering an additional improvement objective in this area as part of its on-going work.

2. Significant Cost pressures – funding for national issues which are putting long-term pressure on FRS budgets

There are a number of issues impacting on the financial sustainability of FRS (amongst other public services) which could have a detrimental impact on the ability of FRS to maintain their services to the public.

2.1. Pay

The majority of services' budgets relate to staff costs and inflationary pressures on direct staffing costs, as well as indirect cost impacts where services are provided through a third-party, will have a significant impact on overall cost. This cost will need to be funded to avoid any detrimental impact on the level and quality of service provision.

Looking forward, it is clear that the sector would need an increase in central FRS funding if it is going to reform employees' roles in line with ongoing and emerging objectives. Any further reforms would need to be supported and sustained by Government funding, previous costing estimates for this have been in the region of 15% of the pay bill.

2.2. Pensions

This submission is made without prejudice to any New Burdens application FRAs may make.

Pension cost pressures and administration issues are a significant risk to FRAs budgets. The legislation requires each of the FRAs to locally manage their scheme (known as scheme manager), which means they operate in a complex environment of 44 scheme managers, 16 administrators and 2 software suppliers. The choice of software supplier is the decision of the administrator not the FRA. As such local administration carries inherent risks, particularly around discrepancies in treatment of pension administration changes and whilst there have been several joint procurement exercises between FRAs, there is further opportunity to seek collaborative solutions to pension administration.

2.2.1. GAD revaluation

The 2016 GAD revaluation resulted in a headline rate increase of 12.6% of employer pension costs, which in 2019-20 equated to £125m. The Home Office agreed to fund £115m of this pressure in 2019-20 and 2020-21, and for 2021-22 this was paid by MHCLG and will be added to base budgets in 2022-23 rather than offered as a grant to ensure financial sustainability and FRS ability to plan their resources. As pay costs increase, so do employers' pension costs and therefore this would also need to be reflected in funding.

2.2.2. McCloud/Sargeant

The bill to introduce changes to the public sector pension schemes to remove the age discrimination identified by the courts including in the Firefighters scheme has now been introduced to the House of Lords. <https://bills.parliament.uk/bills/3032>

This bill confirms that remedy will be in two parts, both prospective effective by 1 April 2022 and retrospective to be introduced by 1 October 2023 but to apply retrospectively from 1 April 2015 to 31 March 2022.

Full details of the age discriminatory remedy can be found on the [age discrimination pages](http://www.fpsregs.org) of www.fpsregs.org.

This will create a significant project for FRAs to implement and there will be on-going pressure throughout the SR period across three main areas.

1. Operational costs

2. Actuarial Costs
 3. Other Costs
1. Operational costs. The costs of implementing remedy will fall on FRAs operational budgets, costs are likely to be across:
 - a. Software
 - b. Administration and management costs

Software

The implementation of remedy will require large scale and significant software amendments in a short timescale (it is envisaged that legislation may not be available until 9 months before the enforcement date), as well as substantial work by administrators and scheme managers.

The software solution will require the creation and maintenance of two sets of new benefits over a retrospective seven-year period, as well as maintenance of the current benefits, all of which need to satisfy the requirement of the tax systems and then maintained going forward over a period of 20+ years to allow a member their choice of benefits at retirement.

This introduces substantial risk and a scale of development in a short timeframe which has not been seen before. (The reforms in 2015 had a longer introductory period). The risk of the sector not being able to implement remedy for members without substantial automation is extremely high and the sector is dependent on two different software providers.

Co-ordination of this software project is being managed centrally by the pensions team at the LGA. One of the software providers has provided detailed proposals regarding their delivery plan which is across six clear phases of work and details how they can deliver in the timescales as well as early ballpark commercials, however these are both commercially confidential and still require detailed scrutiny including approval of requirements, assurance on delivery and value for money assurance and the second supplier has not yet provided similar plans.

Administration and management costs

FRAs are reliant on administrators to do the day-to-day processing of benefits, and each FRA is required to appoint an administrator. However, there are significant demands on the FRA as well as the administrator to implement remedy.

As a result of guidance on immediate detriment, FRAs along with their administrators are being asked to undertake lengthy and detailed calculations to pay members their benefits before the relevant legislation is introduced. That means operating without software systems and processes in place which is time consuming and will be chargeable as extra project work by administrators. Estimated chargeable hours to do one calculation is about 8 hours.

In the long-term, administrators are yet to assess their costs for implementing remedy, and they will to a certain effect reflect the level of automation of software that will be available. Once the software plans are approved and known, administrators and FRS's will then be able to assess their own resource needs, however at present these details are not known.

The Home Office provided a £3m grant to Fire and Rescue Services in respect of their pension admin costs incurred in 2020/21.

Total operational costs

When [responding to the HMT consultation on remedy](#), the SAB made some estimates (Paras 292 to 309) of the cost of implementation using the base costs from the report commissioned by the board in 2019^x which indicated that the cost of administering the scheme under business as usual requirements was currently estimated at £77 per member (Total cost £4,241,095).

The board modelled that the long-term effect of the Deferred Choice Underpin (DCU) would have a significant effect on the ongoing maintenance of solutions and estimated that the additional effort of implementing remedy would be between 50 to 75%, which at its highest could change the cost of the scheme per member to £168 per member (total cost £9,277,395).

Based on those figures at that time, the board predicted that the highest increase to operational costs to implement remedy would be circa £5 million (from £4.2m to £9.2m). At this current time, based on the current level of detail being provided by software administrators and software providers, that estimate might be considered a conservative estimate and effort appears to have been increased above the 75% the SAB envisaged, and estimates may now be higher than £5 million once the full software costs have been determined for both software suppliers.

2. Actuarial Costs: Increased employer contributions which are likely to impact on FRS budgets in the next valuation, with rates being implemented from 1 April 2024 and therefore within the three year spending review period. The employer contribution costs will be determined by the 2020 valuation and the outcome of the [consultation on the discount rate methodology](#), which if kept at the current methodology predicts an increase of over 20% in employer contributions. Given central estimates of £2.5bn per year for all schemes^{xi} it is clear that this cost pressure cannot be borne by FRS as there will be a significant impact on delivery of services to the public.
3. Other costs: There are other costs that also occur due to the age discrimination, including but not limited to:
 - The legal costs imposed on FRAs as a result of inclusion in the Sargeant litigation
 - Legal costs imposed on FRAs because of guidance on immediate detriment issued to locally administered schemes and the ancillary litigation against FRAs brought by firefighters unwilling to wait for the legislation relating to remedy to be implemented. Similar guidance was not issued by government to centrally administered schemes due to acknowledged difficulty in implementing immediate detriment before legislation. This forced FRAs to incur legal costs on how to implement immediate detriment for areas not covered by or unclear in the guidance.
 - It is not yet known how any compensation scheme will work for costs borne by employers before the legislation is in force, particularly for immediate detriment cases where employers might be liable for significant sums. Unless HMT

introduce suitable arrangements to ensure employers are fully compensated for those sums, FRAs will look to recover these costs from government direct where they arise because of remedy to the discrimination.

2.2.3. O'Brien/Matthews

The Matthews case will introduce a second options exercise for retained firefighters to join the Firefighters Pension Scheme 2006 (FPS 2006) from the start date of their employment, which could start from 1970. As such there are several financial issues that arise from this new options exercise.

1. Operational costs: Experience of the options exercise for special members of the Firefighters Pension Scheme 2006 (FPS 2006) across 2014 and 2015 was that this was largely a manual employers' project rather than a pension project. Calculators were provided via an Excel spreadsheet and calculations were run on a manual basis per member and were a considerable burden for those FRS with high numbers of retained staff.

The likely overlap with the McCloud exercise will mean resourcing this project will be difficult and may need to fund additional resource beyond expectations.

It is also highly likely that there will be further take up as any additional employee's pension contributions can be deducted from pension due, so at no detriment to the pensioner, which will increase both the operational costs of the exercise and the actuarial costs.

It is estimated that this burden will fall to FRS payroll, HR and finance teams at a further cost of approximately £1.4m^{xii} to English services.

2. Actuarial Costs: Increased employer contributions which are likely to impact on FRS budgets in the next valuation, with rates being implemented from 1 April 2024 and therefore within a potential three year spending review period. The 2020 actuarial valuation will only assess the cost of employer contributions for the first options exercise. The employer contribution cost of the second exercise will not be known until the results of the 2024 valuation. The current consultation on the appropriate methodology for the discount rate could also affect these employer contributions.
3. Other costs: There are other costs that also occur due to the second options exercise, including but not limited to Government agreement to extending the scope of the exercise to include more members who would be eligible to join, and any compensation costs for tax losses to members that are borne by employers before suitable funding mechanisms are in place.

2.3. Impact of COVID-19 on collection funds

The COVID pandemic has had a significant impact on FRS, with business continuity processes being in place since March 2020. Whilst the impacts of the pandemic and subsequent lockdown are yet to be fully understood, the resulting recession will impact on households' and business' ability to pay their Council Tax and Business Rates. The impact will be felt across the sector, with grant funding being received for 75% of the deficits arising in 2020-21 and with FRS picking up the remainder, there may be a higher degree of impact on embedded FRS which have conflicting priorities such as adult social care and children's services.

It is currently difficult to collate data from billing authorities but national forecasts for income losses in 2020-21 are^{xiii}

- 4.54% of Business Rates = **£31.1m** for standalone FRAs
- 2.88% of Council Tax = **£24.5m** for standalone FRAs

For context, these losses of £55.6m are equivalent to 1,300^{xiv} firefighters or around 6% of the wholetime workforce^{xv} in just one year. Whilst the MHCLG announcement in July allowing local authorities three years to settle collection fund deficits is welcome, we request funding equivalent to, or on-going protection from collection fund losses to prevent cuts to front line services being made as a result of the pandemic. Given there will be local variation in collection rates, precept flexibility for fire would also support the ability of FRS to set balanced budgets over the medium term.

2.4. National Resilience

New Dimensions assets are now coming to the end of their life and require replacement at an estimated cost of £100m, however, the NFCC will work with the Home Office to see where efficiencies can be made that may be able to drive down these costs. We are clear that financial responsibility for New Dimensions national resilience capability sits with the Home Office and should not become a burden on FRS. The sector position is that future funding should not be subsumed into the Revenue Support Grant where transparency around the amount and allocation will be lost.

2.5. Emergency Services Network

The Emergency Services Network should improve digital capability in FRS. The delay in roll out of ESN is well documented and we are clear that additional costs arising from central issues with the programme should not become a burden on FRS, especially where the business case models an overall saving for the public purse. Recent research has found that the length of the ESN programme is creating inertia and restricting innovation by suppliers as well as the potential financial impact. Clarity is needed on the impact at local FRS level to support planning and risk awareness.

3. Sector Improvement – delivering enhanced building safety and ensuring FRS are Fit for the Future

3.1. Focus on Protection

The HMICFRS State of Fire report found that “Many services don't do enough to make sure premises comply with fire safety regulations”, “There is an inconsistent approach to the number of inspections services carry out” and “The lack of fire safety enforcement is a concern”. Protection teams have been disproportionately affected by funding cuts within FRS over the last decade, partly due to the rise of prevention since 2000 and more recently as FRS commit to protect frontline operational firefighters in response to risk and public consultation. Consequently, the number of Protection staff have reduced by as much as 32% in the last eight years^{xvi}, resulting in a loss of specialist skills and experience throughout FRS, reflecting an underinvestment in fire safety.

There is a clear need to invest more in protection activity as the sector responds to systematic deficiencies highlighted by the Grenfell Tower Investigation (GTI), with particular focus on high risk, high rise buildings. Dame Judith Hackitt's recommendations in the Independent Review of Building Regulations and Fire Safety – Building a Safer Future and resulting legislative changes have increased the duties and responsibilities for Protection teams.

The fire sector is progressing work to build understanding, capacity and capability to meet the requirements of the Building Safety Programme and recent findings for more complex buildings. Whilst there is an opportunity to boost the number of inspections delivered using

existing staff as outlined in section 1.5, targeted investment is needed to ensure that services are able to deliver against the new fire safety regime in a safe and sustainable way.

3.1.1. 2020-21 Grant Funding

In the 2020-21 financial year, £20m has been granted to the sector for enhanced protection activity with a further £10m available for implementation of the Grenfell Tower Inquiry Phase 1 report, of which £1.6m is being retained by the Home Office to deliver Control Room ICT infrastructure enhancements.

£21.4m in total has been granted directly to FRS support specific pieces of work, to deliver:

- Building Risk Review Exercise via MHCLG grant - £6m
- The Protection Uplift Programme - £10m
- Recommendations from GTI phase 1 report including purchase of smoke hoods - £5.4m

£7m has been granted to the NFCC (via CFOA Charity) in addition to established £1.5m funds for leadership and standards

- £4m for the Fire Protection Hub and Building Safety Team, including support to FRS for the work above, via MHCLG grant, the benefits of which were outlined in the Protection Board: Programme Business Case finalised on 6 March 2020 and delivery to date of:
 - Framework for Managing Risks for High-rise Residential Buildings with ACM Cladding
 - High-rise Residential Buildings Interventions Feasibility and Impact Assessment
 - Costs for Safety Interventions in High Rise Residential Buildings
 - Risk Assessment Process for High Rise Residential Buildings for the Protection Board Building Risk Review Process
- £3m uplift for Improvement Capability of the sector, to include recruitment of specialist expertise, NFCC capacity and enhance Programme Management Office programme plans, which is covered in more detail on pages 11-13 of this report

In the 2021-22 financial year a further £14m was allocated to FRS to continue their uplift in the protection teams, with a further £6.5m allocated to the NFCC to continue their work in this area.

3.1.2. Investment needed over the spending review period

Whilst this one-off funding is welcome and will deliver significant improvement to the sector's protection capacity as well as specific pieces of work (such as assurance on high risk, high rise buildings), it is the first investment in fire protection via FRS for many years and represents only 1.3% of core spending power^{xvii}. Sustained investment will support continued delivery against priorities already identified through legislative review, which align with ministerial priorities:

- Building upon 2020-21 and 2021-22 Grant funded activity to consolidate FRS protection teams' competence and capacity to respond to new legislative environment – maintaining the £10m Protection Uplift Programme to support sustainable recruitment in to specialist roles.
- It is assumed that the *High Rise High Risk Review* exercise was a one-off pending introduction of new legislation. If this work is to continue, ongoing funding of £6m is required
- The current Protection Board Programme is planned to run until December 2021; Augmenting the £0.7m NFCC funded Building Safety Team via a £3m per year grant

(£0.75m in year 1) to the Fire Protection Hub will maintain capability in key specialist areas to support new legislative requirements – this represents a £1m saving against the initial investment as individual FRS build their capacity and capability in Fire Safety

Figure 5 – Building Safety Team – planned annual investment

Data & analytics	Fire safety	Central Policy	Comms & education
current staff	current staff	current staff	current staff
new analysts	new legal advisers	new policy/admin staff	new comms/ed staff
IT and software	contracted services	hub leadership	learning
expenses	flexible resource, FRS	miscellaneous	engagement
£0.52m	£0.67m	£0.89m	£0.92m

The Board aims to strengthen protection activities across FRSs in England and is charged with delivery of the ministerial commitment to increase the pace of inspection activity across high rise/high risk buildings to inspect or assure these properties no later than December 2021. The Board has been developing a programme of work to meet this new expectation and increase the capacity of services ahead of the new Building Safety Regime, helping to identify and help resolve fire safety issues before other major incidents occur. The work of the Board will be essential in supporting the new Building Safety Regime going forward, central support capacity will continue to be needed alongside:

- New burdens are being placed upon FRS through the introduction of new legislative requirements. The Fire Safety Bill familiarisation costs are expected to be £0.7m in year 1, with ongoing costs of fire safety inspections increasing by £0.7m^{xviii}
- The draft Building Safety Bill has identified in its central case £30.3m - £44.7m of ongoing costs^{xix} for FRS to support the safety of 1.7m homes
- The impact assessment for the uplift to the Fire Safety Order and changes to building control consultations with FRS are still unknown but will not be insignificant

3.2. Fit for the Future – enhancing professional expertise

HMICFRS has identified an urgent need for the sector to enhance its capability to deal with existing and emerging issues: the assessment of risk, data needed to inform decision making, developing a diverse and inclusive workforce which is appropriately trained to prevent and respond to incidents and incorporates learning. These issues are well highlighted by the Grenfell Tower Inquiry, Lord Greenhalgh’s ministerial priorities, the LGA Fire Service Management Committee and previous reviews of Fire (such as Thomas/ Knight).

The NFCC, LGA and National Employers (England) have therefore developed a “Fit for the Future” plan which identifies sector improvement objectives. This joint piece of work provides a roadmap for the development of the sector going forwards, with each organisation contributing to its implementation. The NFCC Central Programme Office (CPO) coordinates the multiple improvement programmes of work on behalf of the NFCC. This overarching coordination helps the NFCC avoid duplication; prioritise work more effectively; and develop solutions and tools more efficiently which support fire and rescue services where a national approach would be beneficial. The NFCC CPO also provides support to the Fire Standards Board and coordinates the development of the full suite of Fire Standards. The guidance that underpins each Fire Standard will be developed by the subject matter expertise drawn from the NFCC network of services and other relevant stakeholders. All NFCC products and Fire Standards will be subject to Quality Assurance to ensure those products have been produced

efficiently and effectively involving all stakeholders and are fit for use. Use of those products, especially when they underpin fire Standards, will help bring about national consistency and drive transformation across services^{xx}.

Development of guidance and standards works well but it has been identified as one of the Fit for the Future improvement objectives that a key element of reform delivery across many of the improvement objectives going forward would be the creation of a central resource to aid implementation and support consistency. The NFCC and the LGA working together are well placed to provide this implementation support, subject to provision of funding.

3.2.1. 2021-22 Grant Funding

In the 2021-22 financial year, a £3m grant has been provided as an uplift for Improvement Capability of the sector, to include recruitment of specialist expertise, NFCC capacity and enhance Programme Management Office programme plans. This funding is in addition to the £1.5m funding available for the Fire Standards Board. The deliverables against this funding have been identified in the Home Office Grant Conditions^{xxi} and performance against plans will be monitored on a quarterly basis.

3.2.2. Investment needed over the spending review period

Whilst this one-off funding is welcome and will deliver significant improvement to the sector's capability and capacity as well as specific pieces of work (such as fire standards), sustained investment will support continued delivery against priorities already identified through legislative review.

- The Fire Standards Board will continue to require funding and support by the CPO as this is ongoing work
- The current programme of deliverables is due to complete by Q1 of 2021-22; Augmenting the £1.1m NFCC funded CPO via a £2.5m per year grant (£1.5m in year 1) to enable further activity– this represents a £0.5m saving against the initial investment as individual FRS build their capacity and capability in these key areas
- Funding will also be needed for a team of implementation officers - embedded within the LGA and NFCC - to support roll out of reform within Fit for the Future. At present the NFCC and the LGA feel that the flexibilities and potential of the current grey book provisions and associated firefighter role expectations are not fully utilised by all services. The LGA posts would provide a consultancy and support service to enable them to do so. This should ease the introduction of initiatives like more effective working patterns and flexibilities within the role maps. These are key elements in support of a number of Fit for the Future initiatives. The NFCC CPO has identified specific deliverables^{xxii} which cannot be supported by the current programme, which will be aligned to the key areas of
 - Leadership
 - Digital & Data
 - Community Risk
 - Culture & Ethics

3.3. Leadership development

Governance is a central pillar of the fire sector and elected members set the policy direction of their services, set the budget and hold assets, provide scrutiny and challenge to services to make improvements and deliver on the policy priorities of the authority. The LGA as the representative body for 44 out of 44 English fire authorities, providing a voice for the sector and supports member development through a sector improvement offer which it funds itself.

The LGA's support offer is open to elected members from all fire authority types. The support offer is designed to support members to further develop their leadership and

governance skills, to promote a deep understanding of key issues like building safety and support the sector to improve equality, diversity and inclusion. This is done through a series of activities including training, such as the Leadership Essentials programme for fire and rescue authority members, governance and leadership training events and the Diversity and Inclusion Champions Network. It is vital that the LGA can continue to support members in this way to ensure members have access to resources that can help them provide good governance. Sustained activity to embed these principles will be required to create the desired impact.

3.3.1. Investment needed over the spending review period

Responsibility for the member development offer should sit within the Home Office fire budget.

- This work will continue to require funding and support by the LGA to ensure that we can provide ongoing development for members. A grant of £115,000 over the spending review period would allow the LGA to continue to provide the member development offer and to work with the NFCC to develop and support the development of a programme of activity around principles of good governance and decision-making and to develop training events for members and officers to embed those principles. Over the three year SR period this would include approximately
 - £50,000 for 6 leadership essentials programmes
 - £40,000 governance and leadership training
 - £25,000 for specialist training for the Inclusion and Diversity Member Champions Network and wider FRA members on equality, diversity and inclusion issues.

CPO Activity Plan beyond grant funding

Activity/Project	Deliverables
Developing effective communications and data sharing (including improving site specific information to operational crews) at operational incidents	Review of the nature and structure of communication between incident ground and control rooms considering technical solutions, message discipline and existing changes in technology.
Developing effective communications and data sharing (including improving site specific information to operational crews) at operational incidents	Conduct feasibility study and survey into existing technical solution and impact upon command and control structure.
Reviewing National Operational Guidance (NOG)	NFCC guidance on risk inspection visits and ensure all actions relating to plans and 7(2)(d)s are incorporated.
Review of National Operational Learning system and arrangements	Recommendations for expansion of National Operational Learning (NOL) to accommodate organisational learning inputs
Supervisory Leader Development Programme	A development programme to nurture leadership at the first level of management with an FRS organisation.
Direct Entry Pathways	A Direct Entry Pathway to include a training programme for entrants on operational duties above firefighter level.
Organisational Learning project	To be scoped
Culture (diagnostic tools)	To be scoped - review of the diagnostic tools available to fire service organisations that support cultural improvement
Health & Wellbeing	To be scoped - would include research projects to provide the evidence-base to support delivery of standards and improved practice in the physical and mental health and wellbeing.
Training courses procurement framework	To be scoped - A procurement framework that aligns National Operational Guidance against training courses bringing consistency and best value.
Immersive technologies	To be scoped - A review and research project into the immersive technologies available (such as virtual reality) and how they might translate to address some of the challenges around maintaining the competency of the workforce.

Fire Protection national guidance	Develop Fire Protection national guidance to support changes made following recommendations by MHCLG Building Safety Programme Resident's Voice Work stream. Development will follow the NFCC Quality Assured approach, hosted on a digital platform using the same integrated approach and accessibility as NOG.
Enforcement toolkit	To maintain a toolkit that can be used by services to improve the consistency and effectiveness of enforcement.
Online public services	Equitable online access to the public for all non-response services.
Data skills	All fire and rescue service staff have a level of data literacy appropriate to their role.
Application development guidance	Standards for local development of software and applications to enable sharing and scalability across services.
Evaluation	Areas of best practice within the UK fire and rescue service will be identified and scaled to be made available to all, improving consistency and maximising existing investment.
Evaluation	Consistent and comparable methodologies to evaluate the performance of local activities.
National Organisational Learning	Evolution of National Operational Learning into National Organisational Learning platform
Digital information service	A national Digital Information Service provides clear direction and consistency in relation to the use and implementation of data analytics within the UK fire and rescue services.

4. Summary

The FRS has demonstrated through national incidents such as flooding and the C19 pandemic its ability to step up and meet demands placed on the country. Within this the FRS has demonstrated its expertise in command and control and logistics. With further development there is no doubt that the FRS can be the primary rescue organisation for the UK, with control of the inner cordon at major incidents and a more significant role in command, logistics and resourcing of national emergencies.

A decade of austerity measures and the localism agenda has had a significant impact on the way that fire and rescue services operate and their financial sustainability. FRS are resourced to risk, focus must be placed on delivering greater consistency and productivity whilst maintaining the ability to respond to local risks and provide essential cover across England. There are clearly opportunities for increased collaboration and more efficient ways of working. However, any resulting savings are tiny when compared to the amount of investment needed to deliver against the new legislative requirements alongside legacy improvements and reform.

The sector is responding to these challenges using a coordinated approach to deliver sustainable change to fire and rescue services and ultimately improved outcomes for the public.

In the last decade the sector has made efficiencies, for example, through a reduction in staffing numbers, estate rationalisation, collaboration and sharing of support services and procurement practices. Further opportunities remain and work is underway to improve

understanding, identify and share good practice across the sector and monitor delivery of gains.

The sector proposes to offer further efficiency savings of 2% of non-payroll budgets, totalling circa £500m, with the savings to be reinvested within the sector.

The productivity improvements shown on pages 7 and 8 are illustrative, based on using the equivalent of 3% of wholetime firefighter time differently to drive local activity, for instance this would be equivalent to increasing the number of home fire safety checks by 65,000 (3.7% increase per annum over three years) and fire safety audits by 18,000 (11.1% increase per annum over three years).

The NFCC is in the process of establishing a productivity and efficiency workstream, and it is suggested that the Home Office should consider establishing a Board similar to the Efficiency in Policing Board, in order to provide a forum to share information and strengthen work on efficiency and productivity. This board should comprise of the LGA, NFCC, HMICFRS and the appropriate Government departments to better inform future spending reviews and sector improvements.

Although productivity improvements are illustrated in terms of additional HFSCs and fire safety audits, local services are best placed to determine the output from improvements in productivity. Likewise, although the improvement has been illustrated using the equivalent of 3% of wholetime firefighter time, some services will inevitably deliver productivity improvements through on-call firefighters and/or support staff.

Services will commit to improvements by producing local productivity and efficiency plans, and progress against these will be monitored and reported on over the SR period through the newly created NFCC productivity and efficiency group.

To enable all of this, the sector would need:

- Council Tax precept flexibility of £5 for all FRS
- Baseline FRS funding to increase by the rate of inflation each year
- Other specific funding requirements identified to be fully funded by Government

Annex 1 – Fire Sector funding proposal

			Sector proposal for Spending Review (£m)				
Funding Requirement	Recipient	2021-22	2022-23	2023-24	2024-25	Notes	
Baseline FRS Funding	FRS (SFA)	1.51%	1.79%	1.89%	1.93%	Inflationary uplift (based on current projections)	
Flooding Capability	FRS (Capital)	-	30	-	-	Purchase of response assets to meet new duties	
Precept Flexibility	FRS	2.00%	£5 flexibility				
Pay	FRS	1.50%	5.00%	5.00%	5.00%	Estimate - subject to negotiations over reformed role	
GAD revaluation	FRS (SFA)	115	117.4	119.9	122.4	Inflationary uplift as a minimum - should track pay	
McCloud Sargeant (Implementation Costs)	FRS	-	5	-	-	Current minimum estimate of implementation costs only (software and administration)	
McCloud Sargeant (Revaluation and potential injury to feeling awards)	FRS	n/a	To be confirmed			In base funding	
McCloud Sargeant (Other Costs)	FRS	3	To be confirmed			Includes on-going admin costs, legal costs and compensation costs.	
O'Brien/Matthews (Administration)	FRS	n/a	1.4	1.4	1.4	Assumes implementation from 2022-23	
O'Brien/Matthews (Resulting revaluation)	FRS	n/a	To be confirmed			In base funding	
Collection Fund Deficits 2021/22	FRS	n/a	18.5	18.5	18.5	One-third of calculated figures in section 2.3, to be updated by Home Office	
Collection Fund Deficits 2022/23	FRS	n/a	To be confirmed			To be assessed by Home Office	
Collection Fund Deficits 2023/24	FRS	n/a	To be confirmed			To be assessed by Home Office	
National Resilience	FRS	10.2	10.4	10.6	10.8	Support required to project FRS grant funding	

Sector proposal for Spending Review (£m)						
Funding Requirement	Recipient	2021-22	2022-23	2023-24	2024-25	Notes
Protection Capacity	FRS	14	10	10	10	Assumes high risk high rise one-off exercise
Protection Team	NFCC	2.5	3	3	3	
Fire Safety Bill	FRS	-	1.4	0.7	0.7	
Building Safety Bill	FRS	-	30.3	30.3	30.3	Assumes implementation 2022-23
Fire Safety Order	FRS	-	To be confirmed			
Leadership Capability uplift	LGA	-	0.12	-	-	
Leadership Capability uplift	NFCC	2.5	2.5	2.5	2.5	
Fire Standards Board	NFCC	1.5	1.5	1.5	1.5	
Implementation Officer Group (Fit for the Future) *	LGA	-	0.2	0.2	0.2	1 x Industrial Relations Specialist 1 x Employment Law Specialist
Implementation Officer Group (Fit for the Future) *	NFCC	-	0.3	0.3	0.3	3 x GM 1 x SM 1 x FRS Grade F

* Figures in the table above are shown rounded to the nearest £m. Detailed figures (£) for the last two rows are:

Funding Requirement	Recipient	2021-22	2022-23	2023-24	2024-25	Notes
Implementation Officer Group (Fit for the Future)	LGA	-	£200,331	£204,578	£208,813	1 x Industrial Relations Specialist 1 x Employment Law Specialist
Implementation Officer Group (Fit for the Future)	NFCC	-	£309,500	£316,061	£322,603	3 x GM 1 x SM 1 x FRS Grade F

Annex 2 – NFCC, LGA and National Employers (England) Fit for the Future Improvement Objectives

1. Fire and rescue services have evidence based, high quality and consistent risk management plans that encompass all aspects of service deployment and delivery, addressing issues of local risk and ensuring they are resilient to national risks and threats including terrorism.
2. Fire and rescue services refocus their investment in the selection, training, development and support of employees to maintain, support and improve their skills and knowledge throughout their careers.
3. Fire and rescue services have access to a comprehensive national infrastructure and repository of standards, guidance and tools that are embedded in their own local service delivery.
4. Fire and rescue services support new and innovative ways to prevent fires and other emergencies. Firefighters work with people who are at risk in local communities to make them safer in all aspects of their lives, not only from fire.
5. Fire protection activity carried out by fire and rescue services is redefined and expanded by using new professional standards, competence requirements and training for firefighters and specialist protection staff assisted by a significant reallocation of resources through increases in productivity.
6. The benefits of all fire and rescue service activity are measured and evaluated so that decision making about resource allocation can be improved.
7. Prospective employees are attracted to fire and rescue services as an employer of choice where inclusive recruitment practices and the available diverse roles and responsibilities help the service manage risk in the local community.
8. An inclusive culture is at the heart of every fire and rescue service. They are a welcoming and supportive place to work for the widest variety of people from all backgrounds.
9. Political leaders, governments and fire and rescue service officers use a single leadership framework that sets out clearly a suite of service values, expectations and behaviours which all can promote and support. It is the basis on which fire and rescue services and all their employees operate.
10. Working with others in all aspects of fire and rescue service activity is core business, based on solid evidence and data that determines the most efficient and effective use of resources to ensure firefighter and public safety.
11. The National Employers (England), LGA and the NFCC jointly own and maintain an organisational learning system that will promote continuous improvement at a strategic level.

Annex 3 - Notes

ⁱ <https://www.justiceinspectors.gov.uk/hmicfrs/wp-content/uploads/state-of-fire-and-rescue-2019-2.pdf>

ⁱⁱ <https://www.local.gov.uk/inclusive-service-twenty-first-century-fire-and-rescue-service>

ⁱⁱⁱ

[https://www.nationalfirechiefs.org.uk/write/MediaUploads/NFCC%20Guidance%20publications/NFCC%20Position%20papers%202020/People/NFCC Equality and Diversity position statement.pdf](https://www.nationalfirechiefs.org.uk/write/MediaUploads/NFCC%20Guidance%20publications/NFCC%20Position%20papers%202020/People/NFCC%20Equality%20and%20Diversity%20position%20statement.pdf)



FRA Response
Times and Staffing.p

^{iv} Somerset Technical Team report “FRA Response Times and Staffing”, July 2020

^v Somerset Technical Team report “FRA Response Times and Staffing”, July 2020

^{vi} <https://www.justiceinspectors.gov.uk/hmicfrs/wp-content/uploads/public-perceptions-of-fire-and-rescue-services-in-england-2019-report.pdf>

^{vii} [https://www.nationalfirechiefs.org.uk/write/MediaUploads/COVID-19/NFCC Making A Difference Document.pdf](https://www.nationalfirechiefs.org.uk/write/MediaUploads/COVID-19/NFCC%20Making%20A%20Difference%20Document.pdf)



^{viii} Illustration of
65000 more HFSC.doc

^{ix} NFCC Reserves Surveys 2018 and 2019 identified 18% of reserves for change programmes and a further 2% for specific digital enhancements

^x 50% of grossed up admin cost per <http://www.fpsboard.org/images/PDF/Surveys/Aonreportfinal.pdf>

^{xi}

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/900766/Public_Service_Pensions_Consultation.pdf, page 31 para 2.58

^{xii} 2 x grossed up admin costs per <http://www.fpsboard.org/images/PDF/Surveys/Aonreportfinal.pdf>

^{xiii} <https://www.gov.uk/government/publications/local-authority-covid-19-financial-impact-monitoring-information>

^{xiv} Using pay including on costs of £41,100 = 1,352 FF

^{xv} % of 22,108 FF per [https://lginform.local.gov.uk/reports/lgastandard?mod-metric=964&mod-period=1&mod-area=E92000001&mod-group=AllRegions England&mod-type=namedComparisonGroup](https://lginform.local.gov.uk/reports/lgastandard?mod-metric=964&mod-period=1&mod-area=E92000001&mod-group=AllRegions%20England&mod-type=namedComparisonGroup)

^{xvi} HMICFRS State of Fire 2019 “In the 27 services that provided comparable data, the number of appropriately trained staff who were allocated to protection work had reduced from 655 in 2011 to 450 in 2019. Another problem the sector faces is the number of qualified protection staff who move to more lucrative posts in the private sector. With inspecting officer qualifications taking at least 18 months to complete, services don’t have a quick fix to fill staffing shortfalls.” (p87, para 3.)

^{xvii} £30m / £2.367bn from Fire Core Spending Power spreadsheet

^{xviii} <https://publications.parliament.uk/pa/bills/cbill/58-01/0121/20200316FireSafetyBill2020IA.pdf>

^{xix} “Further Costs to the FRS” Page 48 of

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/901866/20200708 Fire Safety Order 2005 Uplift Consultation IA.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/901866/20200708_Fire_Safety_Order_2005_Uplift_Consultation_IA.pdf)



^{xx} NFCC Plan on a
Page 2020-21.docx



^{xxi} CFOA GRANT
CONDITIONS- FINAL

^{xxii} CPO Deliverables list for Grant Conditions, July 2020 filtered by “Red” funding status and no timeline allocated