

NORTH WALES FIRE AND RESCUE AUTHORITY

Response to the proposed performance measurement framework and performance indicators for Fire and Rescue Authorities in Wales.

North Wales Fire and Rescue Authority is grateful for the opportunity to submit comments on the proposed performance measurement framework and performance indicators.

Please find the Authority's response to the three key questions posed in the document, and comments on the detail of the proposed indicators.

We also wish to make some comments of a more general nature regarding the proposals:

'Coming into effect'

We would welcome clarification regarding the status of the proposed framework and indicators in this financial year. Given that Improvement Plans for 2007-08 will already have been published before the close of this consultation, and that very little of the year remains, can the Minister's stated intention that FRAs should 'have reference to' the indicators, but not necessarily to the framework be read as being a voluntary arrangement until such time as a Welsh FRS Circular is issued and an Order brings the National Strategic Priorities PIs into effect?

We would not expect any Welsh FRA to be criticised for waiting for the proper introduction of the new framework and indicators before discontinuing their reporting and monitoring of existing ones.

Link to the FRS National Framework for Wales

At a time when the FRS National Framework for Wales is undergoing a root and branch review, we assume that any changes to national priorities would need to be reflected within the National Strategic Indicators set too.

Welsh Language

We note with disappointment that although the Welsh Assembly Government has stated that it is committed to making sure that all people living in Wales have the opportunity to speak whichever language they prefer while carrying out their everyday business and way of life, there are no indicators on the Welsh language profile of the workforce being proposed although there are very detailed ones being proposed on workforce ethnicity, disability and gender.

Overall number

Whilst welcoming and supporting the stated approach of seeking to reduce the number of statutory PIs and of focusing on measuring outcomes wherever possible, we note that the proposed National Strategic and Core indicator sets in total (i.e. when counting all the sub-

sections) number more than the existing BVPIs set despite the fact that the subject areas covered are broadly the same. Furthermore, six of the BVPI sub-sections have actually been dropped from the proposed new Welsh set.

Comparability

In relation to comparing performance we note that there is no intention to compare performance between the three Welsh FRAs in relation to the National Strategic Indicators – an approach that we would support wholeheartedly given the distinctive and unique characteristics of all three FRAs.

However, we also note that the wording of the final bullet point of paragraph 10.3.1 suggests that this same thinking might not have been carried over into the set of Core Indicators. We assume that the implication of the wording was not intended, and that the real intention was to be in a position to assess how FRAs' performance... compares, where appropriate, with the performance of other FRAs, both within Wales and more widely.

Consistency

We welcome the flexibility of the Core Indicators, to allow them to develop over time without the need to undergo legal processes to amend them. However, to ensure consistency of reporting and to support like-for-like comparison, we would expect to see a statement requiring FRAs to compile these Core Indicators according to the latest issued guidance. Local variations would need to be marked as being part of a different set of local performance indicators.

Sharing Information

Similarly, in welcoming the flexibility of reporting requirements for Core Indicators, we would nevertheless expect that FRAs would be required to share details of their performance in relation to them, even when they are not considered to be a local priority.

2007 Survey

We note the reference to FRSs being subject to a public satisfaction survey in 2007. In the absence of additional information, and given that this was not confirmed in time for the 2007-08 budget setting process, we would welcome confirmation that this survey work will be conducted at no cost to the Fire and Rescue Authorities.

Differentiating groups of employees

We note that the corporate indicators follow the previous pattern of differentiating between 'uniformed' and 'non-uniformed' sectors. Whilst accepting that this is probably intended to support comparison with FRSs in other parts of the UK, we would have to question whether there is, in reality, any logical basis for continuing to make the distinction along these same lines. Increasingly, FRSs are employing 'non-uniformed' staff to deliver core 'front-facing' services to the public, namely to promote fire safety in the area. It is therefore difficult to explain why sickness absence, ill-health retirements and ethnicity/disability/gender profiling should be seen as more or less significant in one section than in another.

Question 1 – Do you agree that the local government performance measurement framework should be adapted for use by Fire and Rescue Authorities in Wales?

Response – Yes, this would seem reasonable.

Question 2 – Do you agree with the categorization and coding of the proposed indicators?

Response – Yes, to have the four categories (shared outcomes, national strategic priorities, core indicators, local indicators) makes sense, and follows the pattern used by local government.

Similarly, it is entirely logical to follow the same numbering protocol as local government, including coding amendments and revisions, although the length of the codes will inevitably mean that they will not be used much day to day.

We would suggest also, that consideration be given to aligning the fire and rescue codings with the local government codings where appropriate. For example, the sickness absence indicator is coded as CHR/004 in the fire and rescue set, but CHR/002 in the local government set. This is the same for ethnic origin, disabilities and invoice payment indicators. This would promote comparison in areas where appropriate.

Question 3 – Should there be an annual review and consultation on non-statutory indicators and/or statutory indicators?

Yes, in the same way as already happens for local authorities. We feel that this is particularly important in the first few years of the new set of indicators to allow for amendments to be made; and also in anticipation of the change to the Integrated Recording System (IRS) that will replace the current FDR1, FDR3 and some annual returns reporting.

Comments on the detail of the proposed indicators:

Indicator	Comment	Suggested amendment
Generally	The guidance is insufficiently detailed in relation to FDR1 sources. For example, should the indicator on fire deaths and injuries capture data from all boxes in section 6.7, or only where column 2 records an M, F or X, and not a B or a C? In other words, should deaths and injuries of service employees be included in this indicator?	That sections referring to ‘As detailed within the FDR1 guidance’ should be revisited and more closely defined to ensure consistency in reporting.

Indicator	Comment	Suggested amendment
External Sources	The Local Government Data Unit have been very helpful in defining sources of information.	That all sources of external data (e.g. population and ethnicity) be confirmed with the Data Unit.
Data source:	Where population is 'as specified by the Welsh Assembly Government', there is no guidance as to which source or at which time of year. For example, would mid-year estimates be used?	That sources of population data should be more clearly defined to ensure consistency of calculations.
Data source:	Where non-domestic premises are as per the 'National Non-Domestic rates Provisional Contributions', regulations to amend the 1992 regulations were brought into effect in December 2006. Are they still an appropriate denominator for this indicator?	Confirm that the denominator for this indicator is still appropriate, and that there are no unanticipated changes arising from the amendment to the 1992 regulations in 2006.
Data source	The sources of the calculation data for those indicators that rely on FDR1, FDR3 or annual returns have not been defined.	That the sources of calculation data for all the indicators be clearly defined.
Format	These are not described consistently for each indicator. We would expect to see a section that defines whether the result is to be expressed as a number, a percentage, etc. and whether to 1 or 2 decimal places.	That the Data Unit be approached to support the work of compiling this detail.
Terminology of 'uniformed' and 'non-uniformed'	(Refer to previous comments re the appropriateness of making these distinctions.) References to employee groupings are inconsistent – FRS/CHR/C/001 refers to 'uniformed staff', FRS/CHR/C/004 refers to 'uniformed operational staff', FRS/CHR/C/005 refers to 'uniformed personnel'. Staff on grey book conditions ('uniformed') would not necessarily be required to respond to fires. There is a risk, therefore, that the term 'operational' might be	Ensure that terminology and references to groupings of employees who work different duty systems and/or are employed under different terms and conditions of service are consistent and clearly defined.

Indicator	Comment	Suggested amendment
	inconsistently interpreted.	
FRS/RRC/S/001	Deliberate secondary fires and chimney fires would not appear on FDR1 forms.	Guidance and data sources need to link to FDR3s, and to Supplementary Annual Returns .
FRS/RRC/S/002	Does not consistently stipulate that FRSs must have attended the fire.	Amend by adding 'attended by the FRS' to d.
FRS/RRC/S/003	This indicator specifically excludes fires in Houses in Multiple Occupation (HMOs), but it is unclear how such fires should be dealt with. There is a danger that fires in, say, the stairwell of a block of flats, could be overlooked in that they might not appear as 'dwelling fires', but neither would they appear as 'fires in non-domestic premises'.	That the specific issue of fires in HMOs should be reconsidered, to make sure that the RRO(FS)O has been taken into account, but also to avoid reporting difficulty in the case of fires affecting both communal areas and individual dwelling areas.
FRS/RRC/S/004 FRS/RRC/S/001 FRS/RRC/S/002	<p>These indicators have been the subject of a further meeting between FRSs and WAG to confirm a common understanding of the requirements.</p> <p>The agreed interpretation of the Service Standard is that it seeks a position whereby FRSs reach 100% of fires in dwellings that lie within mapped catchment areas no further than 5 minutes travel time from RDS and day crewing stations and 9 minutes travel time from 24 hour shift stations. Where areas of above average risk have been identified through FSEC, the travel time from 24 hour shift stations would reduce to 4 minutes.</p> <p>Additionally, CFS activity is to be measured and reported in relation to Home Fire Safety Checks delivered in all areas, differentiating between those that lie beyond and within the catchment areas, and between</p>	That the guidance and wording of this indicator be amended in line with agreement reached between the FRSs and WAG.

Indicator	Comment	Suggested amendment
	<p>areas of 'above average' or 'well above average' risk.</p> <p>Any dwelling fires that do occur will be cross-referenced to CFS activity at those same premises within the 24 month period prior to the fire.</p> <p>We are concerned, however, that NWFRA will be disadvantaged for the first two years of this last element. NWFRS has already stated that it is currently unable to report against this indicator as records of Home Fire Safety Checks undertaken in North Wales since 2005 are not available to cross-match to incident data.</p>	<p>In relation to the requirement to report on dwelling fires that occurred in premises where Home Fire Safety Checks had been delivered in the two years prior to the incident, we would urge WAG to remove this to the Core Indicator set for the first two years to allow time for internal systems to be developed to provide high quality data.</p>
FRS/RRC/C/001	<p>The guidance does not take into account open verdicts and how these might be recorded where the open verdict was based on insufficient evidence that the fire was either accidental or deliberate.</p> <p>[Note, an open verdict based on whether the death itself was accidental or deliberate is not applicable to this indicator.]</p>	<p>Add two more sub-sections:</p> <p>Deaths caused by fires in dwellings where an open verdict was recorded in relation to the cause of the fire....&etc.</p> <p>Deaths caused by fires in premises other than dwellings where an open verdict was recorded in relation to the cause of the fire....&etc.</p>
FRS/RRC/C/003	<p>The indicator is inconsistent in its use of terminology for Automatic Fire Alarm Systems.</p> <p>Also, the guidance for this should link to guidance for FDR3, not FDR1, as no fire is involved.</p>	<p>To apply consistent terminology for Automatic Fire Alarm Systems throughout this indicator, and link it to guidance in the FDR3, not the FDR1.</p>
FRS/RRC/C/004	<p>The FDR1 guidance in relation to primary fires suspected of being deliberate has been updated since 1994, so as to avoid, where possible, the use of 'malicious' or</p>	<p>The source of guidance for compiling this indicator to be reviewed and amended.</p>

Indicator	Comment	Suggested amendment
	<p>'doubtful' categories.</p> <p>Also, secondary fires are reported via FDR3, but this report relies on a Supplementary Annual Return to differentiate between accidental and deliberate secondary fires.</p> <p>The explanation refers to the Arson Reduction <i>Team</i>, whereas a reference to the Authority's Arson Reduction <i>Strategy</i> would be more accurate as success can stem from a wider base than the team itself.</p>	<p>Amend the reference to the Arson Reduction Team to read Arson Reduction Strategy.</p>
FRS/RRC/C/005	<p>Comment 1:</p> <p>There is a small but significant difference of interpretation (around 5%) with this indicator, in relation to the inclusion or otherwise of heat/fire detection systems in dwellings, as opposed to simple smoke detectors. This could be resolved in one of two ways.</p> <p>Although the FDR 1 data source has not been identified, we assume that it would be the same as for BVPI 209, i.e. sections 2.13 and 2.16.</p> <p>Either:</p> <p>a) The first option is to confirm that no distinction should be made between heat, smoke, flame or other types of alarms (i.e. that section 2.14 has no impact on the result), which would mean that the calculation would be based on all dwelling fires attended, and would not exclude those where a heat/fire detection system had been installed. The 3 sections of the indicator would add up to 100%.</p> <p>b) The second option is to add a fourth category to record those</p>	<p>NWFRA favours option a) as the most straightforward to implement.</p> <p>If a) is accepted, the wording and headline would need to be amended to reflect that the indicator is not just about smoke alarms. Additional explanation would need to be included in the document to ensure consistency of reporting throughout Wales.</p> <p>If b) is accepted, the wording and headline would remain</p>

Indicator	Comment	Suggested amendment
	<p> dwellings that had no smoke alarm, but which had a heat/fire detection system installed. The 4 sections of the indicator would add up to 100%.</p>	<p> unchanged, but the calculation would need to be extended to accommodate a section iv) $N = (e/b) \times 100$, where e = dwelling fires attended where a heat, flame or other automatic fire alarm system had been installed.</p>
<p>FRS/RRC/C/005</p>	<p>Comment 2: FRSs have realized that there is a problem associated with this indicator in relation to the way the FDR1 guidance, section 2.13, asks ‘Was there an automatic fire alarm system <u>in the area affected by fire?</u>’. This produces misleading results where, for example, a fire starts in guttering or in a meter box located outside the dwelling, or in a communal concrete stairwell in high-rise flats, and where no-one would reasonably expect there to be a smoke detector installed. This indicator, even after the addition of the words ‘affected by fire’ does not take account of this difficulty, and a higher % are inevitably having to be recorded in the third category of ‘no smoke alarm was fitted’.</p>	<p>This is not easy to resolve without FRSs becoming involved in additional recording or analysis that might be so onerous that the effort involved could not be justified. It may be more realistic, therefore, to include additional explanation as a temporary measure, pending the introduction of the Integrated Recording System to replace the FDR1. In the event that any of the 3 Welsh FRSs decide that they wish after all to exclude some dwelling fires from this indicator on the basis that smoke alarms would not reasonably be expected to be installed in the area of the fire, this fact would need to be revealed, for the sake of clarity.</p>
<p>FRS/CHR/C/001 FRS/CHR/C/002 FRS/CHR/C/004 FRS/CHR/C/005 FRS/CFH/C/001</p>	<p>There are no data sources identified either from the annual returns or from external (population) sources. (Refer to previous comment about adopting numbering and guidance consistent with local government indicators dealing with the same subject areas.)</p>	<p>That the Data Unit be approached to support the work of identifying data sources for this indicator.</p>
<p>FRS/CHR/C/004</p>	<p>We see no reason for not reporting the number of days/shifts lost to sickness absence by ‘non-uniformed’ staff. Although the UK government’s target reduction</p>	<p>To add a section iv) by non-uniformed staff (and include in the guidance and calculation sections).</p>

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	related only to wholetime uniformed staff and to control staff, support staff represent a significant proportion of the workforce, and poor performance in this sector would be of interest. Their inclusion would also be consistent with CHR/C/005.	
FRS/CHR/C/005	It is not clear from the guidance that this relates only to ill-health retirements, not to medical discharge. Also, there is no indication as to whether or not it is confined to those who have actually been awarded an ill-health pension.	That the guidance and data sources for this indicator be clearly defined (i.e. linked to annual returns) to ensure consistency.
FRS/CFH/C/001	The reference to invoices sent to schools is irrelevant.	Delete this reference.

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