

Appendix N

Tier-One Authority Submission
(with response)



PCC Response to Norfolk County Council

Contents

1. Introduction	3-4
Status of Draft Business Case	
Consultation Process	
Detailed comments on the PCC's business case	
2. Sections	
2 Strategic Case	6-11
3 Economic Case	11-24
4 Public Safety Case	25-39
5 Commercial Case	39-44
6 Financial Case	44-50
7 Management Case	50-54

Introduction

This document provides the detailed response to Norfolk County Council's 'Norfolk Fire & Rescue Service – Keep in Safe Hands' response to the PCC's formal consultation process.

Status of the Draft Business Case

The draft business case sets out the details of the proposal to adopt a new Governance Model for the Fire and Rescue Service. The proposal is based on the Government's statutory test of being in the interest of improving economy, efficiency and effectiveness, while maintaining and where possible improving public safety.

The document was prepared for the PCC, in the first instance, to enable him to make a decision on whether to proceed to consultation with the proposed option, following an initial Option Appraisal.

The consultation process provided the opportunity to gather views from all public sector partners, representative bodies and the general public. Following completion of the process, the draft would be reviewed and updated to a final version, to reflect any queries or amendments that arise from the consultation.

The business case comprises a number of sections as set out in the statutory guidance, which together provides detailed information on all aspects that need to be considered in developing the proposal to adopt the Governance Model.

It is important to reiterate that the consultation focussed on a draft business case, and necessarily, put forward a range of proposals in sufficient detail to provide assurance that they are realistic and deliverable, in each case based on past precedent, either in Norfolk or in fire services elsewhere in the country.

It would not be possible at this stage to commit to specific particular operational changes, it is however possible to identify a range of potential options that could be considered to enable the changes to take place safely and deliver the projected benefits. These options would necessarily be assessed by the Chief Fire Officer, post implementation, to take into account public safety and risk.

The benefits also reach far beyond being purely financial, and focusses on aligning strategies and priorities to drive and keep a focus on joint working, to make the most effective and efficient use of the resources available to deliver the best possible services for local residents.

Consultation Process

The statutory consultation process was particularly challenging, in the face of strong opposition from Norfolk County Council. The publication of an alternative business case and communication strategy, run in parallel with the 8 week statutory consultation period, raised concerns over the risk that public understanding could be compromised.

The consultation report provides full and comprehensive details of all the PCC's activity. A chronology of Norfolk County Council's media activity is also included together with wider coverage from all interest parties.

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 each section is set out below in a table identifying Norfolk County Councils position alongside the OPCCN formal response.

2 Strategic Case

2.1 The purpose of this section	
No comments.	Noted
2.2 There are many drivers for change	
No comments.	Noted
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.	Agreed. The National Fire Chief's Council (NFCC) and its predecessor the Chief Fire Officers Association (CFOA) and other leaders within Fire and rescue, have long recognised the need for reform within the sector, particularly in the context of continuing pressure on public finances.
2.4 The Policing and Crime Act 2017 presents an opportunity	
No comments.	Noted
2.5 New governance models are already emerging	<p>A number of PCCs have already explored the available options around fire & rescue governance. Essex has already had its local case approved and now has a Police, Fire and Crime Commissioner.</p> <p>Business cases for Staffordshire, Northamptonshire, West Mercia, Cambridgeshire and North Yorkshire have been approved by the Home Secretary and will see the creation of Police, Fire and Crime Commissioners. The Gloucestershire PCC is currently in the process of a public consultation.</p>
In respect of Northamptonshire County Council, we do not agree that their position is similar to that of Norfolk County Council.	<p>We acknowledge that the financial situation is different in both counties however the structures, transition and delivery of the governance model is similar.</p> <p>Northamptonshire PCC gained approval from the Home Office to transfer the governance arrangements from the County Council in April 2018.</p>
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	<p>Northamptonshire CC supported the change in governance as being in the best interests of the public. It is noted however that the context in which this approval and support was given is different. However, the principle of transfer remain the same.</p> <p>Northamptonshire CC faced similar challenges to that of Norfolk County Council in terms of their concerns about</p>

interests of the public. However, it is important to note the context within which this approval and support was given, i.e. that:-	asset transfer and the financial impact that a transfer to a PCC might entail.
The County Council is a failing authority with significant financial issues	It is important to note that Northamptonshire adopted the same CIPFA methodology to calculate the quantum of each funding source.
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.	Noted
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.	Noted
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.	This proposal is not about protection of the fire and rescue service, this business case is about the development and reinvestment in the service. There is a fundamental difference in strategic visions between the NCC and protection of the budget and the PCCs vision about the developing and modernisation of the fire and rescue 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.	Agreed. However; the Communities Committee budget of £48.3m is only 8% of the estimated County Revenue Budget 2019/20 of £591m.

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.	In terms of Police and Fire Collaboration, track record suggests that progress has been slow, patchy and complicated. As of spring this year, the operational police and fire joint collaboration board had not met for more than 12 months.
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.	Under the new Governance model NFRS would gain full control of its budget. It will be ring fenced, enabling the CFO to identify efficiencies and re invest back into the service. As part of the new governance arrangements, the PCC is also proposing to set up a grant fund of £100k per annum. This will support the NFRS to develop and deliver collaborative community safety projects to address the root causes demand for Fire and Rescue services and help improve public safety. The fund is available to locality leads to address local issues.
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.	The demand is shifting away from the conventional fire fighter role. Nationally the Fire and Rescue service is looking to reform, there is a drive to change Integrated Risk Management Plans (IRMPs) from being reactive to a more proactive risk based modelling approach. HMICFRS expectations of IRMPs moving forward are that they need to change tack and start articulating the FRAs capacity and capability to respond to threat and risks (similar approach to the Statutory Policing Requirement signed off by Home Secretary for Policing). Furthermore, there is opportunity for the IRMPs to link in with Local Resilience Forums and articulate and cross reference to community based risk registers alongside taking into account the Hackitt review recommendations following Grenfell.
climate related – increases in severe weather events, including coastal and inland flooding and forest fires. Norfolk is the 10th most at risk area of flooding. We are also seeing increases in the need for water rescue (also see 4.3.6 below).	The Fire Rescue Services Association (FRSA) in their response stated that: 'There are many opportunities for modernisation within the Fire service itself, whereby expansion to the role of firefighter would provide greater opportunities to protect the public by means of social care, safe and well visits, co responding (emergency medical response), and patient transportation etc., similar to the work being undertaken in Lincolnshire. As fire calls reduce, it is imperative that the Fire service remains relevant in a modern society by

	diversifying the service it provides to the public’.
2.9 Under the PCC, Norfolk Constabulary is modernising its service	
No comments.	Noted
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.	<p>Whilst there are examples of some good work, the successes in terms of collaboration have too often been slow, patchy and complicated. As of spring this year, the operational police and fire joint collaboration board had not met for more than 12 months.</p> <p>The PCC asked the Chief Constable and his Deputy on the status of Collaboration meeting. They are both very clear that the Collaboration Board has not met since May 2017 and would confirm this if asked publicly. The last collaboration meeting to their knowledge dates back even further than stated. The Chief Constable has indeed publicly stated that the Collaboration Board has not met for more than 12 months, and that any progress in this area has been slow.</p> <p>At the NCC Communities Committee meeting on 17th January, 2018, following a question from one of the members, The Chief Fire Officer confirmed that the Board does not meet.</p> <p>The meeting that NCC refers to (April, 2018) is not the same meeting. This was, In fact, a meeting in the Deputy Chief Constables office with himself and the Chief Fire Officer only. The Deputy Chief Constable has not seen any minutes of the meeting.</p> <p>The FRSA also raises concerns in their response that they were unable to gain access to any of the minutes to the Emergency Services Collaboration Steering Group.</p>
2.11 There are further collaboration benefits but these are getting harder to realise under the current model	

<p>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.</p>	<p>Bringing the governance of police and fire & rescue services under a Police, Fire and Crime Commissioner (PFCC) would allow collaboration between our fire & rescue and police to go much further and at a faster pace. Bureaucracy would be cut, duplication of governance would be cut and efficiency would be improved. Efficiencies gained over time would be reinvested into the service.</p> <p>There would be greater transparency, greater dedicated focus and greater access for the public to hold their fire & rescue service to account. Under the proposed move of governance, Norfolk Fire & Rescue service will have its own budget that will be ring-fenced to fund fire & rescue services only. The PCC believes that if we seriously want to bring about real change and achieve better outcomes for the people of Norfolk then we must do things differently.</p>
<p>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.</p>	<p>This response suggests a 'if it isn't broke, don't fix it approach'. The Business case sets out a range of options with the opportunity to unlock potential efficiencies to reinvest in emergency services. Further examples have been provided in formal stakeholder responses, together with additional ideas and initiatives from the Fire service based on local knowledge and wider best practice.</p>
<p>2.12 Better strategic alignment could be a game changer</p>	
<p>Fundamentally, the Fire and Rescue service and the Police Service have different overarching priorities, operational plans, approach 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.</p>	<p>Figure 3 (Page 31) Analysis of Strategic Alignment' sets out examples in terms of local strategic priorities and a focus on delivering emergency services in Norfolk and how they link together.</p> <p>It is important to note that the two services would remain completely separate with separate budgets. There will be separate chief officers and distinct operational roles. Even with a change of governance, firefighters would remain firefighters and police officers would remain police officers.</p> <p>We are talking about two distinct services with distinct cultures, histories and traditions; both are rightfully proud to serve. That would not change and the two services would continue to retain their unique identities, roles and finances – one service's savings would not fund the other, for example. But, by sharing oversight and making the lines of governance much simpler and clearer, both services would work better together and achieve and deliver much more for the people of Norfolk</p>
<p>That does not mean that there isn't any strategic alignment or common ground. There are already a number</p>	<p>A change in governance can make a difference.</p> <p>Governance is how an organisation is overseen and</p>

<p>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.</p>	<p>scrutinised and how decisions are made. This will include the setting of budgets, how money is spent, overseeing plans and performance, etc. Governance structures differ at different organisations, but often dictate how decisions are made and implemented, and the speed of the process.</p> <p>An effective governance model can lead to better spending decisions, policies, practices and procedures and, ultimately, a better quality service, leadership and conduct. A new governance model can demonstrate transparency and enable the public to hold those in charge to account.</p>
<p>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.</p>	<p>A change of governance does not mean that the Fire and Rescue service would not continue to work together with County services or the NHS.</p> <p>The PCC has been clear that he believes the governance of fire & rescue sits better alongside the governance of a fellow emergency service, rather than alongside libraries, museums, archives, arts and events.</p> <p>He has stated that such a move would not adversely affect the positive and important working relationships the fire & rescue service enjoys with key departments at Norfolk County Council.</p> <p>The PCC has given the example of Norfolk Constabulary which manages to maintain such relationships perfectly successfully as a separate body, as do many other partners. In fact, the business case sets out that the proposed change in governance will speed up decision-making which is beneficial for working with partners to align strategies and create a more joined-up approach</p>
<p>2.13 Conclusion – there is a strategic case for change</p>	
<p>We do not agree that the information in the business case sets out a strategic case for a change in governance.</p>	<p>Fire and Rescue and Police have similar characteristics in terms of local strategic priorities and a focus on delivering emergency services. The ability of a single governance arrangement to focus time and effort on service delivery will help improve the efficiency and effectiveness of both services.</p>

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.	Currently, the PCC holds the police to account, whilst the fire & rescue service is part of Norfolk County Council – meaning twice the governance. Two lots of governance frankly does not make sense, certainly not when it comes to quick and effective decision making. One of the real benefits of the role of PCCs is that it is not hampered and delayed by a complex structure of committees, sub-committees and immovable meetings. PCCs can make informed, evidence-based decisions in a sharper, quicker and more effective manner.
---	--

3 Economic Case

3.1 The options that were considered	
<i>3.1.1 The purpose of this section.</i>	
No comments.	Noted.
<i>3.1.2 The options</i>	
No comments.	Noted.
<i>3.1.3 Option 1 – Enhanced voluntary collaboration</i>	
We believe that option 1 – enhanced voluntary collaboration - offers the best balance of benefits of risks.	Noted.
<i>3.1.4 Option 2 – PCC representation model</i>	
No comments.	Noted.
<i>3.1.5 Option 3 – Governance model</i>	
No comments.	Noted.
<i>3.1.6 Option 4 – The Single employer model</i>	
No comments	Noted.
3.2 How the options were evaluated	
<i>3.2.1 Critical success factors</i>	
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).	It should be noted that the efficiencies generated from the proposals outlined in the business case are not intending to take money out of the service and the use of this freed up resource is not being predetermined in terms of services. The efficiencies generated are to be reinvested in priority areas, as determined by the Chief Fire Officer in discussion with the PCC (e.g. flood protection service, increased

	prevention activity or re-investing in full time fire fighters).
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.	<p>Benefits will accrue to both services, in a way that protects the budgets of both (e.g. fire budget will not be used for police activity and vice versa).</p> <p>The assumption is that benefits will fall to the relevant party, e.g. in the case of a co-location project, the proceeds from an asset disposal will fall to the party owning the asset, but the benefit of sharing running costs could be shared.</p> <p>It is not possible to be more specific at this stage, as all projects must be risk assessed prior to approval, and therefore the exact sites or assets selected and the timing of the project cannot yet be known.</p>
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.	<p>It is true that in theory, few of the proposals are wholly dependent on a change in governance. The case as to why option 3 is considered to be preferable to options 1 and 2 is set out in the business case (page 43, and in Section 4 the Public Safety case). A single strategy, a single point of ownership for assets, and a simplified decision making and governance process mean that projects have the potential to be delivered faster and can be more ambitious than have been delivered to date and at which rate they are anticipated to continue under options 1 and 2.</p> <p>The financial plans for options 1 and 2 have striven to reflect as fairly and completely as possible the current direction of travel in regard to the Council and fire services intentions for co-location, fleet and control room and there is no evidence (e.g. in the form of a long term strategic plan for NFRS) to suggest that strengthened governance arrangements would seek to go beyond this. Under option 3 the PCC sets out the wider scope of change that he thinks could be achieved under a new strategy, under his leadership, based on the results of detailed consultation with both police and fire management.</p>
We do not believe that the economic case has been proven.	Noted.
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	Noted.

of risks.	
<i>3.3.3 Option 3- PCC governance model</i>	
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.	<p>The business case takes great care to fairly represent the level of financial benefit that is likely to be generated under Option 1 and 2, taking into account our understanding of the Council and NFRS's current intentions in regard to co-location, fleet and control room. This includes an assumption about further currently unplanned co-location opportunities that could be explored under Options 1 and 2.</p> <p>Under section 3.3.3, further opportunities are set out under Option 3 that reflect the benefit of a process that goes further and faster under a more streamlined governance model. Therefore, it is logical and fair for the additional financial benefits of option 3 to be added to those possible under Options 1 and 2 and for the total figure of £10m to be presented. Evaluation of the options, is therefore the comparison between the £5.5m generated under Options 1 and 2, and the £10.1m (net of costs) that Option 3 could deliver.</p>
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.	<p>The financial benefit is expressed in both simple absolute terms and in terms of Net Present Value (NPV), to recognise the time value of money. The former is a more readily understandable form for the majority of readers who are not professional accountants or economists.</p> <p>NPV is a more complex accounting concept, which is nevertheless the standard form used for evaluations in government business cases for use by professional evaluators. As the difference between Options 1 or 2, and Option 3 is proportionally the same under either method, it does not alter the comparative evaluation of the options or affect the scoring of options.</p>
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.	<p>As noted above, the purpose of including current plans and direction of travel in the evaluation of Option 1 and 2, was to ensure that a true picture of the potential for change was given for these options. To disregard these benefits would be to imply that options 1 and 2 do not offer any benefit, which is not the case.</p> <p>However, we have committed to providing further clarity on this, and have separated out those savings which represent a continuation of the current direction of travel from the NPV assessment of all options and provided further narrative to make this clear.</p> <p>We have taken care to ensure that, while recognising that some of the planned benefits have been committed to and</p>

	<p>budgeted for in terms of planning, we have found that in these cases the projects have not yet been realised, and have not manifested in financial plans as MTFP savings. In this case they do not create double counting. For example, the 5 replacement 4x4 engines are set out as an intended direction of travel in the current approved IRMP, however they have not yet been developed into a declared budget saving in the Council's MTFP.</p> <p>However, the level of opposition to the proposed change in governance declared by the Council in this document and elsewhere, creates the need for us to review the timing of when any change in governance could realistically take place (if that were the outcome). As a result, it is possible that some of these planned benefits could start to be realised, prior to a decision on the business case. In this case, it may be necessary to revise the business case, to remove the affected benefits from the NPV tables of all the options. It should be noted that this will not affect the overall ranking of the options, as each will be impacted in the same way.</p>
<p>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.</p> <p>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).</p>	<p>Noted. The figures quoted are indeed drawn from the business case, and are a true reflection of the additional value that has been calculated for Option 3 over that offered by Options 1 and 2. This is the reason that Option 3 ranks higher in the options appraisal calculation.</p> <p>Disagree. As the Council has pointed out, all projects will have to be subject to full detailed review to ensure that they can be delivered while managing risk in regard to public safety. As the Council is aware, it is not possible for a full review of risk to be conducted for this business case for specific proposals. This is particularly true in a partisan environment where the Council has already expressed its opposition to Option 3 prior to the business case being presented, and where senior NFRS fire officers are employees of the Council.</p> <p>We have therefore had to strike a balance between developing sufficiently specific proposals to which financial benefit can be attached with a reasonable degree of certainty, without attempting to predetermine the outcome of review (for example, the specific sequencing and location of co-location projects). We also point out that the proposals have been developed in consultation with officers from NFRS and Norfolk Constabulary to develop the projects presented, and in each case are based on pre-existing precedent set by NFRS.</p> <p>We are not clear what objection the Council has to Norfolk Constabulary benefiting from a share of co-location benefit. As noted previously it is expected that the police would benefit from a capital receipt where a police asset is</p>

	disposed of, but that both police and fire benefit from reductions in running costs.
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.	<p>As noted above, in regard to co-location it is appropriate for police and fire to receive benefit in proportion to the assets disposed of, and that there should be no transfer of benefit between budgets. Because the closure of fire stations is particularly problematic in terms of managing risk and workforce, it is logical that the majority of the capital benefit will fall to police. However, we have also indicated that both organisations stand to share revenue benefits in areas such as running costs.</p> <p>In regard to the fleet proposals, any financial benefit would likely fall to fire, although there may be shared operational effectiveness benefits by using the new vehicles as a platform for developing co-responding.</p> <p>In regard to control room, joint planning and implementation of MAIT coupled with co-location is assumed to benefit both organisations, depending on the level of management time that can be freed up in each case.</p> <p>Joint procurement opportunities, would also be expected to result in shared benefits.</p>
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.	We have answered this above. It is true that NFRS can only derive asset disposal benefits, from disposal of its assets. However, we point out that this is only a part of the full financial benefits available.
<i>3.3.4 Option 4 – the single employer model</i>	
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	Noted. The modest savings proposed reflect the fact that unrealised economies of scale are likely to exist only in a few selected areas.

when separating from the (larger) County Council (see also comments at 5.7).	
<i>3.3.5 Optimism bias, risk scoring and sensitivity analysis</i>	
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.	The detailed work behind the assessment of the impact of delivery risk on the realisation of benefits includes sensitivity analysis of cost and phasing. Note also that the business case necessarily, did not prejudge the results of public and stakeholder consultation, but following the formal response from the council the delivery risk will need to be reassessed in terms of the adverse impact on projected financial benefits.
More fundamentally, it does not appear that the outcome of the independent analysis carried out as part of the initial business case process has been taken into account. In particular, the initial business case included the following:-	See below.
"If a local consensus cannot be achieved, the deliverability score of Option 3 will be severely affected. It would remain possible for the PCC to make a successful case to the Home Office without local consensus – as is being attempted elsewhere in the country. However, in our view this approach would carry a higher level of risk, with implications for public safety and value for money. In this case, Option 1 – to continue with voluntary collaboration under refreshed and strengthened arrangements - would need to be considered as a viable alternative."	As noted above, the business case necessarily, did not prejudge the results of public and stakeholder consultation. The options will need to be revisited in the light of increased deliverability risk, as a result of the stated opposition from the Council.
Given the County Council's views (as set out in this document) it is difficult to see how local consensus could be achieved, meaning that the 'higher level of risk, with implications for public safety and value for money' highlighted in this independent assessment are relevant and should be taken into account.	Noted. As above.

3.4 Effectiveness (improving public safety)	
<i>3.4.1 Overview.</i>	
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.	Noted.
Given our concerns, we do not agree that the ratings for Option 3 and 4 are appropriate.	Noted.
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).	<p>This comment seems to be referring to the financial benefits that have already been discussed – the comment that £4.6m is higher than £3.9m is an incorrect understanding that contradicts the correct understanding the Council has shown above.</p> <p>In terms of effectiveness, the moderate rating refers to the fact that the planned co-locations (including control room) and the fleet changes under Options 1 and 2 while offering some potential financial benefit, do not contribute to operational improvements through co-responding or looking for opportunities to work more closely together with police. Case in point, the current control room project limits itself to sharing office space but there is no emphasis on how the two teams can benefit from working more closely together in handling calls and developing an efficient approach to joint responding.</p>
<i>3.4.2 Option 1 – Enhanced voluntary collaboration</i>	
We believe that option 1 – enhanced voluntary collaboration – offers the best balance of benefits of risks.	Noted.
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.	Noted. The argument made here is that currently decisions around assets, particularly fire stations, has to pass through additional governance and any decision has to align to Council strategy, as well as the IRMP and the Police strategy and that this is likely to be slower. We note that there has been significant delay in delivering projects such as control room, co-location projects and the fleet changes, under current arrangements.
Whilst the arrangements under this option are voluntary, it is in the context of a statutory duty for the	Noted.

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 of faster. Our experience is that willing co-operation and a commitment to deliver agreed priorities delivers the best results.	Noted. See comments under 3.4.4 below.
3.4.3 Option 2 – PCC representation model	
No comments.	Noted.
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 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.	The Council acknowledges the importance of driving forward the collaboration agenda. The contention of this business case is that although some good progress has been made – it has been limited in scope and has not focused on how sharing locations can lead to more effective joint responding and better outcomes for the public. Current voluntary arrangements have not resulted in a defined joint strategy for developing community safety and other opportunities to improve co-responding, despite there being an opportunity to do so. The IRMP leads with a discussion about managing budget reductions and although it mentions police collaboration it provides neither the vision nor detailed plans as to how this could be driven forward to the benefit of the community.
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.	Disagree.
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.	It is clear that almost all major strategic decisions are financially significant and contentious to some degree; therefore the Chief Fire Officer currently must always look to the Council to make these decisions. Under the new proposals the Chief Fire Officer would be accountable for delivering an agreed joint strategy (agreed with the PFCC), but would have significantly more financial autonomy, with only the FRS budget and not the Council budget position to be concerned with. On balance, the stronger argument is that it is more effective for the public to be able to hold a single individual to account, who is elected on the back of a specific

	mandate for Fire (and Police), rather than a Committee of members elected and responsible for a much broader range of issues and priorities.
In addition, we are concerned about the resilience of governance arrangements under the PCC. At present, the Fire and Rescue Authority (the Communities Committee) consists of 13 elected Members. Given that the Deputy PCC role was abolished by PCC, under the proposed model governance would be vested in a single person – the PCC – which does not provide any resilience if, for example, the PCC was not available for any reason.	<p>The legislation is clear on procedural matters relating to a Police and Crime Commissioner, as set out in the Police Reform and Social Responsibility Act 2011, Part One, Chapter 6.</p> <p>Furthermore, the work and decisions of the PCC are scrutinised by the Police and Crime Panel, made up of elected members of the County and local authorities, as well as Independent members. If this was to proceed, the Panels remit would increase to become the Police, Fire & Crime Panel.</p>
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.	It is true that the PFCC will not seek to merge the services, as is more likely to be the case under Option 4. However, the statement is highly relevant because the PFCC will look to make sure that all the potential advantages of changes in national guidance on the role of a firefighter are understood, so that a modern fire service can emerge – and this may well open up more opportunities for there to be overlap in some of the roles of police and fire, as is already the case in regard to the road safety prevention agenda, for example.
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.	It is agreed that to reduce back office support from current levels, without an alternative or replacement function would be a cause for concern. However, it would also be a cause for concern if opportunities were not taken to be more efficient, e.g. if opportunities for police and fire to achieve economies of scale without compromising the level of support, particularly over the longer term where the impact of current staff can be mitigated. This is public money and any opportunity to release resources for more effective use elsewhere in the service, particularly where it can benefit the service to the public, is an important feature of Option 3.
<i>3.4.5 Option 4 – The single employer model</i>	
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	Agreed.

significant concerns about this, but as this is not the proposed option they are not detailed here.	
3.5 Maintaining public safety	
<i>3.5.1 Overview</i>	
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.	<p>The complexity of a change, particularly in regard to disaggregating the service from the County Council is relative, but is acknowledged. In the context of public sector reform, Option 3 should be possible to manage – especially as there will be very little change to front line services or to their immediate support services. Past precedent, whether from the setting up of PCCs to NHS restructuring and the introduction of CCGs, shows that this kind of change should be achievable without significantly disrupting emergency services to the public.</p> <p>However, the level of difficulty in the short term is likely to increase without full and proactive co-operation from the County Council and this will need to be taken into account.</p>
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.	14 months is considered to be ‘short term’ in the context of a 10 year initial implementation set out in the business case.
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.	<p>It should be noted that the 315k relates to one off costs only. A further £1.2m of investment has been identified to provide additional support, particularly in the first few years of implementation – particularly in regard to finance, estates and governance. The intention is that this will mitigate against the level of support required from Council and FRS officers.</p> <p>It is true that implementing this where there is opposition from the County Council increases the risk of further cost, which will need to be considered in the revised draft.</p> <p>While there is likely to be a requirement for management time on the part of the Council and FRS, the parties should be willing to support change if a successful case is made that Option 3 offers the greatest level of public benefit.</p>
<i>3.5.2 The Public Safety Override</i>	
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.	Agreed.
We note the APACE guidance that a	Noted. See response to comments under 3.5.1.

<p>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.</p>	<p>In addition, it should be noted that persisting with a governance model that does not optimise efficiency through collaboration or one that attempts to preserve the status quo for reasons other than the improving the effectiveness of the service, carries the risk that the service will not be sustainable in the medium to long term. Particularly in an environment where local government is under significant financial pressure, and may be forced to look to the FRS to provide savings – while this is not yet the case in Norfolk, there is a growing precedent on this among County based fire services and we note that NFRS already has a very low cost per head in comparison to Council based peers and therefore has less potential to be able to sustain further cuts safely.</p>
<p>3.5.3 Option 1 and Option 2</p>	<p>Noted.</p>
<p>No comments.</p>	
<p>3.5.4 Option 3 – PCC governance model</p>	
<p>See comments at 3.5.1 above.</p>	<p>Noted.</p>
<p>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.</p>	<p>We agree that to deliver change in the face of Council opposition of such a high degree, as has been demonstrated both prior to and following the development of the options appraisal and business case, presents an increased risk of prolonged disruption.</p>

<p>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.</p>	<p>We recognise that a change of this type, could result in the potential loss of some corporate memory.</p> <p>We dispute that ‘specialist’ rather than general corporate services form the bulk of the corporate support services that will not transfer, as the FRS establishment due to transfer will include ‘specialist’ HR, ICT, finance and some procurement capability. Other areas such as Internal Audit, and procurement in particular are areas that can benefit from a fresh approach that could more than compensate for lost corporate knowledge.</p> <p>Note also that the £1.5m investment cost includes provision for additional finance, governance and estates resource to support implementation and mitigate financial pressures.</p> <p>It is envisaged that a key part of the detailed implementation plan will include measures to mitigate against this risk – including the option of continuing to procure services from the council in the short to medium term if this is the best and safest option.</p>
<p>We would expect Option 3 to at least have an Amber, rating</p>	
<p>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.</p>	<p>Disagree. It is logically in the best interests of public safety, if the FRS adopts the most efficient and effective governance model, as has been argued under economy, efficiency and effectiveness in the business case.</p> <p>The IRMP will apply equally to Option 3, and will continue to be consulted on in the normal way. The IRMP would need to be updated as a result of a planned change in governance and would continue to be a key safeguard to preserve public safety and all proposed projects would need to be checked to ensure they are aligned to the IRMP prior to implementation.</p>
<p><i>3.5.5 Option 4 - The Single Employer Model</i></p>	

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).	Noted. Option 4 is not necessarily unsafe if delivery is adequately planned and managed.
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.	Agreed. We agree to the extent that to deliver a change to Option 3 in the face of Council opposition, significantly raises the risk of a smooth and efficient transition.
3.6.2 Option 1 – Enhanced voluntary collaboration	
No comments.	Noted.
3.6.3 Option 2 – PCC representation model	
No comments.	Noted.
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.	We agree to the extent that given that the County Council is opposed to a change to Option 3, it will take longer to deliver and therefore Summer of 2019 target for implementation will have to be reviewed.
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.	<p>We agree that there is some complexity involved in a change to Option 3. We point out that Northamptonshire is in the latter stages of its implementation phase and fire services will transfer from the County Council in the near future. Northamptonshire therefore provides a model to follow and Norfolk could benefit from the experience of all parties, including the Home Office. The Hertfordshire case has also provided useful experience to draw on in this regard.</p> <p>Having said that, the scale of change is no more complex than other public sector governance changes that have been successfully and smoothly delivered over the past decade. In this we point to the establishment of PCCs to take over the governance of police, and the establishment of Clinical Commissioning Groups (CCGs) in the NHS. The creation of combined fire authorities is also a relatively recent model that can be drawn on.</p> <p>In this context, Option 3 is comparatively straight forward as the operational resources and the majority of support services will transfer in their entirety, along with buildings, vehicles and other assets, and they will continue to deliver</p>

	to the existing service plans until these can be updated. The complexity is limited to the transfer of governance arrangements, funding and the remaining general back office support functions. In the case of support functions, arrangements can be made to implement transfer over a longer period of time, post implementation, in order to facilitate a smooth transition and in most cases, it is envisaged that these services will be incorporated into the existing police shared service function.
Past experience suggests that projects such as this tend to incur higher costs, take longer, and deliver lower benefits that anticipated at the outset.	Delivery risk has been considered in the business case. There is an increased risk premium as a result of attempting to deliver change without the support and full co-operation of the Council, which will now have to be incorporated into the final business case.
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).	We have commented on this in the response to 3.5.1 above.
Given the County Council's opposition to the proposed change in governance, if it was to progress then an we believe an independent review would be needed.	Agreed. This is our expectation and would be welcomed.
<i>3.6.5 Option 4 – The single employer option</i>	
No comments.	Noted.
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.	Noted. We will consider the impact that Council opposition will have on the successful delivery of the preferred option and the realisation of benefits.
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.	Noted.

4 Public Safety Case

4.1 The purpose of this section	
No comments.	Noted.
4.2 Overview	
We do not agree that there is a public safety case for change and we have significant concerns in this area.	Noted.
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.	Noted.
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.	This refers to advantages to the next tier of strategic planning, including alignment of resources and improving co-responding. The simple point is that at this more detailed level it will be easier to achieve closer alignment with Ambulance (and other services) if police and fire have already aligned their strategies and are working towards joint service planning, where this is appropriate. At the moment, police and fire do not align their strategies to this degree and therefore strategic alignment is harder to achieve with Ambulance.
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.	This is itself a disingenuous argument. The Council knows that the proposals in this business case cannot be fully risk assessed at this stage in terms of the IRMP. The business case necessarily, puts forward proposals in sufficient detail to provide assurance that they are realistic and deliverable, in each case based on past precedent, either in Norfolk or in fire services elsewhere in the country. It is not possible at this stage to commit to specific particular operational changes, e.g. to locations or vehicles at those locations. It is however possible to identify a range of potential options that could be considered to enable the changes to take place safely and deliver the projected benefits – and these options would necessarily be assessed post implementation, to take into account safety and risk.

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.	We address the more specific comments below.
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.	<p>From the evidence available from the Council, we have not been able to see a detailed long term strategic plan for the development of the fire service that has closer collaboration with police and other services at it's core, either in the Council's strategic plan, the IRMP or from discussion with Fire managers.</p> <p>The business case acknowledges that progress has been made, but has been relatively slow – for example, the interval between the time taken to deliver co-location sites, including the control room.</p> <p>A joint strategy, a single decision maker in regard to assets and a streamlined governance process with fewer key stakeholders – are, on the balance of probabilities, likely to enable faster delivery of more ambitious plans.</p>
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.	Agreed. However, it will remove the need for the Council to have a say on how fire assets are used, which is informed by the Council's own financial position.
4.3 Protection, prevention and community safety	
<i>4.3.1 Community Safety Hub</i>	
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.	Noted.
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	<p>Protection and prevention are areas where police and fire can work together more closely, under the umbrella of community safety.</p> <p>The business case is fully cognisant of the statutory responsibilities of the fire service, and the community hub can continue to support fire or police specific aspects (such as crime prevention and fire prevention).</p>

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 centre of excellence approach would not prevent staff from engaging in a wider range of activities, or on a rotation basis, alongside some individuals who may wish to specialise. It is anticipated that the detailed development of this scheme, would be down to police and fire to agree, it would not be imposed on NFRS.
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).	The business case fully recognises the importance of NFRS's role in supporting health and social care and it is anticipated that this will continue (see business case p60).
<i>4.3.2 Community safety task force</i>	
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.	We agree that this is not dependent on the governance model, but point out that given the amount of time that police and fire have been collaborating in Norfolk, that these opportunities have not yet been fully developed.
There are already some delivery arrangements in place with Police colleagues, including delivering the #Impact programme which is funded by the PCC.	Noted. As above.
<i>4.3.3 Volunteers</i>	
The County Council's Community and Environmental Services Department (which is the home department of the Fire and Rescue	Noted.

<p>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.</p>	
<p>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.</p>	<p>Noted.</p>
<p>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.</p>	<p>Disagree. This acknowledges that co-ordinated management of volunteers could be useful, but then makes very broad assumptions about what motivates volunteers to help their communities, as a reason for not developing it.</p> <p>It follows that the motivation for volunteering is complex, and that there is no reason why a significant cohort of people would be interested in helping both emergency services (with others specialising), and there is no reason to think that this is a binary decision between one or the other.</p>
<p><i>4.3.4 Safe and well visits</i></p>	
<p>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.</p>	<p>Noted.</p>
<p>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,</p>	<p>Noted. Capacity to do this work is an area that some of the financial benefit could be re-invested in if this was seen as a priority area and access to Police resource may be able to assist directly or indirectly with freeing up FRS</p>

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.	capacity.
We do not think that a fire and police community safety volunteer approach would be deliverable (see comments at 4.3.3 above).	See comments above.
<i>4.3.5 Investing in children and young people</i>	
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.	Noted.
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.	Noted. The business case argues that by bringing these schemes closer together, young people would be given exposure to both services, which may help fire recruitment and encourage young people in either service to come through the ranks with a more open mind in regard to the benefits of collaboration.
<i>4.3.6 Water safety</i>	
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, particular 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.	We are aware that the Council has been funding this provision through ring-fenced grant funding, which is now coming to an end. This is an area that could benefit from re-investment of FRS budget that will be freed up as a result of the financial benefits generated by Option 3.

Also see comments on Community Safety Hub and Volunteers above.	Noted. See response 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.	Noted.
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.	Noted.
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.	<p>While the East Coast Consortium work assists with resilience, in the case of a rare or one off event, it does little to enable local efficiencies to be made, by developing the police and fire control rooms.</p> <p>As set out in the business case, the core benefit comes through developing and implementing MAIT jointly between police and fire in Norfolk – so the systems and supporting processes are co-ordinated and rolled out in tandem. This is expected to lay the ground for increased co-operation in the future (i.e. familiarity with each other’s processes). It is also expected to improve the efficiency of co-ordinating a response to a call - between agencies, and particularly the large numbers of calls that require a multi-agency response, through greater automation and common processes, replacing manual processes.</p>

<p>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.</p>	<p>Agreed. See above.</p>
<p>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.</p>	<p>This is addressed in our response above.</p>
<p>4.5 Co-location and joint responding</p>	
<p>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.</p>	<p>As stated in the business case, all proposed changes are subject to agreement with the FRS managers and due consideration of the IRMP (p60). Public safety remains the overriding priority, with an emphasis on improving this over time.</p> <p>The risk assessment argument in the IRMP works both ways, in that it should be focused purely on managing risk in terms of the service offered to the public – which the PCC fully supports. However, there is also a duty on the part of those charged with governance to make sure that police and FRS resources are not tied up in assets and buildings, that are not required in order to manage the risk safely – e.g. for reasons of local political expediency.</p> <p>It should be noted that the financial benefits identified in the business case are not ‘savings’ to be taken out of the FRS or police, they represent resources that can be freed up to reinvest in other areas of the service that will have more impact on improving the service.</p>
<p>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</p>	<p>Noted. As stated, this was an error in the map presented as part of the business case, which has been acknowledged.</p>

<p>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.</p>	
<p>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.</p>	<p>Disagree.</p>
<p>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.</p>	<p>Noted. See response above.</p>
<p>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</p>	<p>Due to the emphasis on protecting Fire stations in order to preserve the integrity of the IRMP risk assessment, in most cases the benefit is expected to accrue from enabling the police estate to be sold, with police and the fire service both benefitting from sharing the running costs. In this way, fire assets that would otherwise be vacant for the majority of the time are being utilised more efficiently.</p> <p>The point being made about retained staff is not relevant, as there are no proposals to reduce current fire officer establishment.</p>

<p>basis. This is not free resource that is sitting around waiting to be called out.</p>	
<p>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 2nd 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.</p>	<p>Noted.</p>
<p>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.</p>	<p>The pilot scheme discussed on pages 64-65 of the business case is for 3 additional vehicles, in addition to the 5 planned vehicles (8 in total).</p>
<p>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.</p>	<p>There will be no additional cost, as the intention is to replace existing larger engines. Some saving will arise from the smaller vehicles being able to operate with a smaller crew. The saving arises from fewer retained call outs and less requirement to backfill crew with full time staff. Again, this is not about reducing the number of fire fighters (full time or retained), it is about freeing up resource, including staff time, which can be re-invested in other areas of the service.</p>
<p>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.</p>	<p>The business case has deliberately avoided attempting to second guess the operational decisions that will need to be made by the Chief Fire Officer in regard to the deployment of resources, and has restricted the proposal to a projected 3 vehicle pilot project to be accommodated following review of all current stations and appliances. It is envisaged that this opportunity could arise from:</p> <ul style="list-style-type: none"> • Existing stations where there are currently 2 full size appliances. • New co-located stations that could replace one or more smaller stations in the same location, over time. • Single appliance stations in specific circumstances - e.g. that have struggled to recruit retained crew

	and/or where full size appliances could be deployed from nearby stations or as part of a mobile resource, without adversely impacting on response times, in proportion to assessed risks.
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.	As has been established – the diagram referred to was incorrect, and in any case presented only one of many possible permutations for deploying smaller vehicles. We also note that smaller vehicles also have advantages in remote rural locations, e.g. where there is narrow or restricted access.
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 agreed that additional lighter vehicles would be a significant decision that would need to be subject to a review of risk, in due course. As stated in the business case, the financial benefit does not reflect 'savings' to be taken out of the budget, as the FRS is used to experiencing under the Council governance. The financial benefits represent freed up resource for re-investment (e.g. in additional full time firefighters).
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).	As stated, the specific location of lightweight vehicles will be a matter for the Chief Fire Officer and his team to determine following a review of risk implications. As has been established – the diagram referred to was incorrect, and in any case presented only one of many possible permutations for deploying smaller vehicles.
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	The proposal is not for an additional 8 vehicles, it is for an additional 3.

risk.	
<p>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.</p>	<p>The deployment of fire appliances in a modern fire service, is a function of co-ordinating a large number of stations and appliances that mutually support one another. It is not just a matter of the nearest local appliance attending. Modern resource management also makes use of floating resource, which adds further resilience.</p> <p>The business case is fully cognisant of the possibilities and deployment of smaller vehicles of various kinds. It is noted that smaller vehicles have already been deployed in various permutations across the UK, including the Scottish Fire and Rescue Service, Hampshire, Royal Berkshire, West Midlands, East Sussex, Cheshire, Devon and Somerset, North Yorkshire and Tyne and Wear. It is a model that is establishing a proven track record.</p> <p>In this respect, Norfolk are not currently one of the leading innovators in this field, however in Norfolk the current IRMP does sanction the development of 5 smaller vehicles – so there is a local precedent. It is therefore misleading to suggest that a modest increase of a further 3 smaller appliances, would be intrinsically unsafe where 5 would not be.</p> <p>The business case provides the Chief Fire Officer with a good deal of flexibility and does not seek to restrict NFRS to a narrow set of specific options at this stage. Smaller vehicles can range from very small ‘buggies’ to 4x4 lightweight appliances to 12 tonne lighter appliances. Although the proposal costing is based on 3 4x4 lightweight appliances, all of these options remain on the table.</p>
<p>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.</p>	<p>This appears to be referring to the diagram on page 66. As has been established – the diagram referred to was incorrect, and in any case presented only one of many possible permutations for deploying smaller vehicles.</p>
<p>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</p>	<p>As stated, the specific location of future co-located sites will be a matter for the Chief Fire Officer and his team to determine following a review of risk implications. There is no commitment to develop an additional opportunity at Broadland Gate, although it remains a possible site for review in due course, following implementation.</p>

<p>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.</p>	
<p>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.</p>	<p>It has been necessary to build in flexibility into all the proposals, in order to recognise the fact that all operational changes will need to be thoroughly risk assessed and the decision will ultimately rest with the Chief Fire Officer.</p> <p>It is disingenuous to argue for the Council to argue the above, and then to criticise the fact the detailed proposals have not been put forward that could then be fully risk assessed. This is particularly true in a situation where the Council manages the fire and rescue service, and is therefore not in a position to assess the proposals objectively – given its opposition to the proposals that pre-date the business case and the preceding options appraisal.</p> <p>The proposals have been developed following significant consultation and are rooted in existing precedent in Norfolk and the wider UK. They are therefore significantly more than just 'ideas'.</p>
<p>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.</p>	<p>Noted.</p>
<p>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.</p>	<p>The floating resource model that is currently in place has scope to be developed further, to compliment the proposals in the business case.</p> <p>The statement regarding rent is not disputed.</p>

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.	As referenced in the business case, a change in governance will enable the sharing of tasks across fire and police, through closer collaboration and blending of skillsets will provide the scope to innovate, respond better to local priorities, and through better engagement, achieve value for money.
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 noncritical tasks that they need to be 'freed up' from.	Feedback we have had from NFRS indicates that there are staffing pressures that have to be managed. Use of freed up firefighter time would be at the discretion of the Chief Fire Officer but could be used for: prevention, community safety, and service development, additional training, as well as plugging gaps in the retained resource (e.g. by a larger mobile resource).
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.	Noted.
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	This has not been achieved under the Council to date, and this is a key area of growth that requires impetus and strategic focus.

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 work streams is commercialisation and work is well progressed on the following key areas of focus:-	All noted.
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.	Noted.
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	There are a few instances where opportunities for using a shared resource in support services could reduce the overall need for current staff roles. Again to be managed through closure of vacancies rather than redundancy.

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.	As above.
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.	Noted.

5. Commercial Case

5.1 The purpose of this section	
No comments.	Noted
5.2 Overview	
We do not believe that the commercial case has been proven.	Disagree
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.	The transfer of assets (property, plant, equipment and vehicles) would be detailed in a Transfer Order.
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".	The first priority locations for possible site sharing would be the following: <ul style="list-style-type: none"> ○ Attleborough ○ Holt ○ Hunstanton ○ Loddon ○ Reepham

<p>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.”</p>	<ul style="list-style-type: none"> ○ Stalham ○ Watton <p>In the above, the existing fire station would remain and police would review joining on to the existing premises, together with Ambulance Service and other partners in some cases.</p> <p>Having the estate assets under the one governance of the PCC means we can deliver the projects quicker and at lower cost for the public.</p> <p>The future location of fire stations would be risk assessed and prioritised in accordance the IRMP, responsibility for which rests with the Chief Fire Officer. This would be in the context of understanding the future housing/commercial development as the population of the County of Norfolk grows.</p> <p>The “same location” will depend on the geographical context. The positioning of fire and police stations in an urban environment is more likely to be nearby each other in the same town/community suburb. In the rural environment, this co-location would cover a wider area, reflecting the parishes/villages and risks the station will serve. All decisions linked back to the IRMP.</p>
<p>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.</p>	<p>Under one governance structure the delivery of site sharing estates projects will be easier and more efficient as:</p> <ul style="list-style-type: none"> ○ One decision making and finance review process ○ No formal legal leases required between the parties ○ No formal development agreements required between the parties ○ Building specifications and contracts outputs prepared by one party only ○ One party to any build/construction contracts ○ One party to any maintenance and facilities services contracts ○ No formal external orders and invoicing between the parties, reducing administration ○ One asset and insurance valuation undertaken ○ One set of Estate maintenance and Fire policy covering the management of buildings ○ Clear one line responsibility for statutory duties/maintenance and project delivery. <p>The Norfolk PCC’s Joint Estates department has an excellent understanding of Fire and Rescue and joint premises needs.</p> <p>The Joint Estates department also manages Suffolk Constabulary premises where we have already delivered joint police and fire capital projects premises in:</p> <ul style="list-style-type: none"> ○ Debenham

	<ul style="list-style-type: none"> ○ Felixstowe ○ Framlingham ○ Ixworth ○ Newmarket ○ Saxmundham ○ Woodbridge <p>We also currently have more projects under way in:</p> <ul style="list-style-type: none"> ○ Beccles ○ Ransomes, Ipswich ○ Stowmarket <p>Within Norfolk, we have also been pro-active to share sites with the East of England Ambulance Service. This has been achieved at:</p> <ul style="list-style-type: none"> ○ Attleborough Police Station ○ Aylsham Police Station ○ Earlham Police Station (West Norwich) ○ Hunstanton Police Station ○ Long Stratton Police Station ○ Sprowston Police Station <p>We are working with the Norfolk Fire & Rescue Service to advance project proposals at Attleborough, Holt and Reepham, but if single governance under the PCC was put in place, this could be achieved quicker and at lower cost.</p> <p>We also understand that Norfolk County Council enjoys the full time support of a consultant Fire Service building surveyor. In the PCC's plans it is assumed that this post will continue and will form a future part of the PCC's Estates Unit. This will help provide the continuity of service and background knowledge of the Fire & Rescue estate. <i>(NOTE: This and other posts will be reviewed as part of HR/TUPE legal process).</i></p> <p>Estates savings will be made from:</p> <ul style="list-style-type: none"> ○ Shared/reduced revenue running costs ○ Reduction of building planned maintenance costs ○ Capital receipts from the sale of surplus premises <p>As estates fixed over-head cost savings are made the quality of service for the front-line should be maintained and possibly enhanced; as there will be more resource for this purpose.</p>
<p>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.</p>	<p>What estates assets transfer or not transfer depends on what the Fire & Rescue Service uses on and before the date of transfer.</p> <p>This has been allowed for in paragraph 5.31.1. We have outlined that the sites and premises used by the Fire & Rescue service will be reviewed into categories identified as:</p> <p>1) Simple, 2) Shared, 3) Complex and 4) Surplus.</p>

	<p>Our report outlines that the identified ‘surplus’ sites and premises will remain with Norfolk County Council.</p> <p>A similar estates transfer process was undertaken in 1995/1996 with Norfolk County Council when the then Norfolk Police Authority was established. Both parties Estates staff and consultants have experience of dealing with the transfer issues at that time.</p>
<p>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.</p>	<p>As stated above, what assets transfer or not transfer depends of what the Fire & Rescue Service uses on and before the date of transfer. Again, this been allowed for in paragraph 5.31.1 as any existing internal NCC co-location and external leases with other partners will be considered as ‘shared’ premises and documented to continue.</p> <p>Future ‘possibilities’ do not exist at the date of transfer. However; such matters would have to be reviewed on a site by site basis by the responsible parties. Such an example may be if the Fire & Rescue service has vacated premises just prior to the date of transfer, but an alternative NCC department has not moved in that location as yet.</p> <p>Post transfer – the parties will still support partner premises co-location and use through the Norfolk One Public Estate Programme Board.</p>
<p>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.</p>	<p>The Estates department has outlined the savings in the business case which are deliverable from both parties estate changes. To date, annual policing joint estate (<u>revenue</u> only) savings of £6.48m have been achieved over a similar timeline for the historic period of 2011-2017, (This excludes capital receipts from the sale of property) therefore the business case is confident of achieving this goal.</p> <p>Even though many police stations will move to fire station sites, the Fire & Rescue service will benefit from savings by way of:</p> <ul style="list-style-type: none"> - Reduced business rates costs for shared areas - Reduced energy and facilities costs for shared areas - Reduction in planned maintenance part liability – following part police new builds on the fire station premises. <p>As outline above, PCC governance of the estate would simplify the processes to achieve the state financial proposals.</p>

5.4 Human resources	
Formal agreement has been signed to enable West Yorkshire to deliver administration of the Firefighters Pension Scheme 2015.	Noted – the business case reflected our assumption that this would take place and that the arrangement would continue.
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.	<p>The proposal to transfer governance of NFRS to the Norfolk PCC would not result in compulsory redundancies as a direct result of the change in governance.</p> <p>As stated by NCC, delivery of proposed financial savings <u>may</u> result in future redundancies but any such proposals would be subject to future review and subsequent business case. Reduction in resource levels does not always result in compulsory redundancies; natural turnover and review of posts as and when they become available can result in a reduction in resources and financial saving.</p> <p>Any redundancies would not be a direct result of the transfer and in the current financial climate within the public sector reduction in resources 'may' be necessary regardless of employer.</p>
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.	<p>Given the very different security level between Police and Fire IT networks there is no initial plan to provide joint Police/Fire IT. It should be accepted that there are current collaborations in place between Norfolk Fire and other Fire Authorities which the OPCCN would not want to jeopardise such as the arrangement with Humberside, Lincolnshire and Hertfordshire. However, as illustrated in the business case, there will be a more immediate need to provide HR and Financial systems to support the management of the people element of the Fire Service by the OPCCN therefore there is a cost to enable some integration for HR and Finance systems to support that activity.</p> <p>IT would seek to explore Police/Fire IT integration as and when opportunities present themselves where single systems would support efficient and effective management of both entities.</p>
5.6 Finance team	
No comments.	Noted.
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	The means by which this will be achieved has already been articulated in the business case.

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.	Despite requesting the information NFRS did not provide a full list of their contracts and associated costs, both those directly awarded by NFRS and those utilised from Norfolk County Council. More detailed mapping and a pipeline of convergence would be required but the principle remains as detailed in 5.7.1. Given the options presented in this section and subject to due diligence, even where fire requirements cannot be included in existing contracts NFRS is extremely unlikely to be without contracts for the goods and services that it needs.
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.	It was not possible to provide a broader assessment of savings as contract information was not provided by NFRS. Norfolk Constabulary is progressing into a 7 Force Procurement collaboration with the other Eastern Region Forces and Kent which will see it becoming the second largest police procurement group after the Metropolitan police. Additionally, all forces are participating in the Collaborative Law Enforcement Procurement (CLEP) programme which is a national initiative led by the Home Office and providing savings across national areas of aggregate spend delivering savings in excess of 5%. The Fire Service within the Home Office is also running a similar programme where there are synergies with the police. Given usual predictions of procurement savings from collaborations being sometimes as high as 20%, 5% appears conservative and reasonable.
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.	Please see the earlier comments.

6. Financial Case

6.1 The purpose of this section	
No comments.	Noted.
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	Disagree. This comment summarises the County's various comments on all sections of the Financial Case. The business case does conclude that, subject to

<p>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.</p>	<p>agreement on the financial disaggregation, the new organisation will be affordable and sustainable going forward.</p> <p>The uncertainty of future funding is clearly identified in the business case but the Medium Term Financial Plan set out in Figure 23 of the Business Case shows that there is headroom of £0.3m from 2020/21 which could be used to absorb funding pressures or for investment.</p>
<p>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.</p>	<p>Agreed. The County Council provided financial information, not a ‘solution’. The wording will be amended.</p> <p>However, the paragraph goes on to say that ‘...a solution must be found which recognises the financial position of the Council.’</p> <p>Future funding risks are acknowledged in 6.3.9.</p> <p>The FAQ published on the website 19/7/18 also acknowledges that the county provided ‘information’.</p>
<p>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.</p>	<p>Agreed, but the county does not calculate the budget for NFRS by taking the notional RSG amount and then topping up with council tax.</p> <p>For this reason the independent CIPFA (draft) model for calculating funding has been used which produces different figures.</p>
<p>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.</p>	<p>Agreed. It was envisaged that the financial separation could be negotiated with the county post consultation, however no further figures have been provided at this time.</p> <p>The budget and financial planning assumptions going forward will be for the new organisation to determine.</p>
<p>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</p>	<p>See above. Any financial separation would need to be ‘viable’ for both parties.</p> <p>The assumption in the financial forecasts within the business case continues to be that any reductions in RSG will be offset by similar increases in business rates. This assumption has been used in a number of similar business cases submitted by PCCs to the Home Office.</p> <p>This matter has been the subject of correspondence between the Leader of the Council and the PCC and</p>

Fire and Rescue Service budget. The current Revenue Support Grant is being replaced from 2020/21 and the impact of this is also unknown.	between the Managing Director and the OPCC Chief Executive. The financial assumptions for a single purpose local authority (which the separated F&R service would be) will be different to those of a multipurpose local authority.
6.3 Funding NFRS	
6.3.1 The Methodology	
We note that the CIPFA guidance relied on is draft.	As set out above, the County does not calculate the budget for NFRS by taking the notional RSG amount and then topping up with council tax.
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.	As a result, the CIPFA (Option 3) methodology has been used, which is the only independent guidance available at this time. CIPFA believes this to be “the only option which would be fair to county councils and to PCC-style FRAs”.
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.	It is acknowledged that the financial separation needs to be viable for both parties.
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.	Noted. The assumptions referred to in 6.3.2 are budget (cost) assumptions, not financing assumptions.
6.3.3 Key differences	
See comments at 6.2 above.	The County comments on 6.2 relate to financing assumptions.
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.	Reasons for not agreeing have not been provided.
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	It is acknowledged that this figure is a ‘planning assumption’ provided at a very early stage. We have now been advised, and can see from Committee

<p>2019/20 budget shortfall that the County Council needs to address and is used for planning purposes only.</p>	<p>papers that NFRS will not have to make any savings in 2019/20.</p>
<p>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.</p>	
<p>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.</p>	<p>Noted. This is the reality of budgeting in austerity. The business case presents a series of options for potentially significant efficiencies.</p>
<p>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.</p>	<p>The business case includes a number of proposals for potential financial benefits. More detailed work on these would be required before they could be included in the budget/financial plan.</p> <p>It is clear, however, that efficiencies are possible and they will enable investment in the service and/or help to balance the budget moving forward.</p>

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.	Noted, but the comment does not address the point that the NFRS budget is underfunded for water rescue. It is contradictory to say that transfer of the F&R budget cannot be afforded but additional money can be found for pressures (e.g. for water rescue) at any time.
6.3.7 Revenue budget of NFRS	
No comments.	Noted.
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.	Agreed. In the business case and in the response to FAQs the need for agreement between the parties on the financial separation has been highlighted.
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.	See above.
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.	The business case includes a number of proposals for potential financial benefits. More detailed work on these would be required before they could be included in the budget/financial plan. It is clear, however, that efficiencies are possible and they will enable investment in the service and/or help to balance the budget moving forward.
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	The PFCC would not ‘put at risk’ any operationally essential improvements.

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	Noted. We have been unable to establish how this NFRS capital programme is financed.
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.	Noted. The business case is predicated on significant changes to the estate and to the fleet. To suggest that safety is an issue as a result of a detailed capital programme not being published is disingenuous.
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.	Noted.
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.	Agree. Permission has not yet been sought from the County for use of their data in the actuarial assessment.

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.	Agree. See above
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.	Agree. See above.

7. Management Case

7.1 The purpose of this section	
No comments.	Noted.
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.	<p>All PCC business cases are developed on proposals, the first stage is to conduct a strategic options appraisal, and the second is to complete an outline business case (which is used to conduct the public consultation).</p> <p>Once all of the results have been analysed a final business case will be produced for the PCC to decide on whether to submit to the Secretary of State or not.</p> <p>Under this proposal it is estimated that over £10m worth of efficiencies can be generated over the next 10 years, primarily from accelerating the programme of co-location and collaborative solutions to the operational response.</p> <p>Each scheme would be subject to its own individual business case, to be overseen by the Chief Fire Officer and his/her team in order to align with the Integrated Risk Management Plan.</p> <p>It is important to note that the benefits of the proposal reach far beyond being purely financial. The proposal is about aligning strategies and priorities to drive and keep a focus on joint working to make the most effective and efficient use of the resources available to deliver the best possible</p>

	services for the people of Norfolk.
7.3 Governance and project management arrangements	
No comments.	Noted
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.	<p>The OPCCN set up an engagement structure to support the business case development process, outside of statutory necessity.</p> <p>The PCC recognised the importance of an inclusive approach, engaging with key stakeholders to share and validate information. A series of meetings, workshops, and exchanges of information have taken place with key stakeholders including the Fire & Rescue Service, Norfolk Police.</p> <p>Three groups were put in place, supported by our business partner Grant Thornton:</p> <ul style="list-style-type: none"> • A Strategic Reference Group (SRG) consisting of the OPCCN CEO, Chief Fire Officer and Project Manager • A business case development Group, chaired by the OPCCN CEO consisting of senior personnel, supported by work stream leads, giving access to staff and data as necessary • An Expert Advisory Panel consisting of experienced professionals working with 'blue light' services, including Sir Ken Knight (former Chief Fire & Rescue Advisor to the UK Government). The Panel was further supported by professionals in the field of accounting, legal advice, human resources and communications. <p>The Chief Fire Officer attended the Strategic Reference Group, progress reports, information were provided, minutes of meetings also taken.</p> <p>The Terms of Reference for each Group is included in Appendix B of the business Case.</p>
7.5 Transition management	
No comments.	Noted.
7.6 Implementation timetable	

<p>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.</p>	<p>The business case sets out the likely timelines, it also identifies a range of planning assumptions including:</p> <ul style="list-style-type: none"> • Original assumptions based on timings indicated by the Home Office, factoring in an Independent assessment, the earliest target date for the new governance arrangements is 1st April, 2019. • It is acknowledged however, that with the addition of an independent assessment, timelines could be affected with the potential for a revised implementation date. <p>The Hertfordshire business case is different; their process was lengthened due to additional information being requested by the Home Office through the Independent Assessment process, in the form of an addendum submission by the PCC.</p>
<p>7.7 Transition planning assumptions</p>	
<p>See comments on 7.6 above.</p>	<p>In preparation of this business case proposal there was sufficient time 'built in' to the transition timetable in case any delays were encountered as this is good business case management. There are no concerns around the implementation timetable at this time.</p>
<p>7.8 Implementation post transfer</p>	
<p>No comments.</p>	<p>Noted.</p>
<p>7.9 Stakeholder engagement</p>	
<p>No comments.</p>	<p>Noted.</p>
<p>7.10 Public consultation</p>	
<p>No comments.</p>	<p>Noted.</p>
<p>7.11 Risk management</p>	
<p>We have noted the detailed risk register included at Appendix E. We some specific comments on some of these risks, as follows:-</p>	
<p>OPCC10 – benefits stated in the business case are overstated</p>	<p>Disagree.</p>
<p>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</p>	<p>Disagree.</p>

and severe.	
OPCC11 – Local Authorities do not agree with the case for change, triggering the independent assessment process	This risk focusses on the potential delay in benefits realisation should an Independent Assessment be triggered. However, with the County Council in opposition to the change in governance, this provides an opportunity for third party review/scrutiny of the business case should the PCC submit to the Home Secretary.
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.	This is viewed as a positive step and one that would be welcomed. This is reflected in a change to the scoring.
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.	We see no reason why collaboration and cooperation would cease on day one of the new arrangements. Indeed we would expect collaboration with the County to continue. Over a period of time there would be a new blue light 'family' developing its own identity and shared arrangements.
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.	It is Medium Term Financial Plan the County has assumed that the additional precept for Adult Social Care will not be repeated from 2019/20 onwards. If, in fact, the additional precept is approved for 2019/20 we would expect to consider the impact on the County's budget as part of the disaggregation discussions.
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.	There are presently 23 stand-alone (combined) fire authorities all of whom have to manage their own budget and funding pressures. The business case identifies options for significant benefits and the savings would be available to help balance the budget.
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	If there is internal County Council resource attributable to fire and rescue activity this should be identified and included in the disaggregation calculation.

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.	Noted.
7.13 Equality impact assessment	
As the initial Equality Impact Assessment has not been published we are unable to comment on it.	The Business Case clearly sets out on Page 93, that the Equality Impact Assessment will be published once the feedback from the public consultation has been received as it is a required component to inform this assessment.
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.	The Chief Fire Officer, under the new Governance arrangements, will have operational independence. This is no different to that of the Constabulary. Therefore, any operational changes will be the responsibility of the Chief Fire Officer in line with delivering the Integrated Risk Management Plan (IRMP) and will be subject to the relevant impact assessments on a case by case basis.
7.14 Legal review	
No comments	Noted.