

Consultation questions

1. How do you think this new duty would help drive collaboration between the emergency services?

We have a number of key points:

- a) The Government's strategy of continuing with its financial austerity will only be sustainable if it is accompanied by fundamental reform which focuses on *mergers* of police forces and emergency services, as opposed to collaboration, which can be more difficult to manage with potentially fewer benefits.
- b) Consideration of a national policing structure (e.g. force mergers, 'layering' of functions at regional and national level) would have to take place *before* either individual forces merge or enter into fundamental collaboration of core policing services and/or with other emergency service bodies. If not, opportunities for optimising services and benefits through collaboration could be missed or prevented if collaboration progressed in an ad hoc way. Planning and management at a strategic (regional/ national) level would mitigate this risk.
- c) A more fundamental change is required to enable the Government to take the lead in mandating the necessary changes to remove a number of obstacles. For example, in Thames Valley Police force area, there is 1 police force and 3 fire & rescue bodies. Accordingly, the PCC would only consider taking on the responsibilities of the fire & rescue authorities, and for merger/collaboration of policing and fire and rescue services, if there was one combined operational organisation with one common set of systems and assets (e.g. combined control rooms, vehicles and response teams). This would be necessary to avoid the emergence of inconsistent Force operational practices across and between the 3 county areas that the Force covers, and to maximise the potential benefits (operational and financial) from collaboration/merger.

2. Do you agree that the process set out above would provide an appropriate basis to determine whether a Police and Crime Commissioner should take on responsibility for fire and rescue services?

In principle, yes, although the practicalities will be difficult.
For example, it is unclear what the sanctions are if the 3 sets of emergency services are unable or unwilling for any reason to discharge their collective duty to collaborate with one another.

3. Do you agree that the case for putting in place a single employer should be assessed using the same process as for a transfer of governance?

In principle, yes, although, as above, the practicalities will be difficult.

4. What benefits do you think could be achieved from empowering Police and Crime Commissioners to create a single employer for police and fire and rescue personnel, whilst retaining separate frontline services, where a local case has been made to do so?

The time and resources required to achieve a successful cultural change need to be weighed against any financial gain and/or intended benefits. Given the relative sizes of fire and rescue services (FRS), the benefits could be marginal to the investment. While there may be some advantages in streamlining business support/ICT, there are no advantages in reducing police officer numbers.

Streamlining 'back office' (e.g. business support / ICT) functions could bring some material benefits, although there are a number of cultural and organisational challenges (primarily different systems, policies, terms and conditions, and cost of change) which may outweigh any advantage for creating a new single employer.

It is difficult to see local councils in Thames Valley fully supporting the move in such a way, although we are mindful that new PCC responsibilities – such as those seen in the 'Manchester Mayoral model' – may incorporate aspects of Health delivery in the future.

5. Do you agree that the requirement for a chief officer to have previously held the office of constable should be removed for senior fire officers?

No.

This is a questionable proposition. The suggested structure makes the new chief officer the same rank as a chief constable, when clearly the latter post holds – on paper at least – greater responsibilities (qualitative and quantitative). If this proposal was implemented, the necessary 'checks and balances' for determining the appropriate expertise and knowledge of a new combined chief officer will need to be particularly robust and would require strategic support as well as necessary training from the College of Policing.

6. How do you think the requirement for a Police and Crime Commissioner to have access to an informed, independent assessment of the operational performance of the fire service should best be met?

Under the current regime, HMIC's role and remit clearly does not extend as far as FRS, however, it does have experience and expertise in conducting large-scale assessments – PEEL is a pertinent example of this. Further consideration of a joint 'independent assessment framework' should be given in which HMIC, in collaboration with an appropriate FRS body (i.e. Chief Fire and Rescue Adviser and/or Chief Fire Officers Association) produce an assessment that will objectively inform and add value to the PCC.

7. Do you agree that where a Police and Crime Commissioner takes responsibility for a fire and rescue service, the Police and Crime Panel should have its remit extended to scrutinise decision making in relation to fire services?

Yes, as long as they are appropriately established, maintained and informed to provide expertise and effective scrutiny on key decisions and actions of the Police and Crime Commissioner relating to policy, resources and service delivery performance, and their composition demonstrably meets the statutory 'fair representation objective' for the combined police and FRS area.

8. Do you think that where a Police and Crime Commissioner takes responsibility for a fire and rescue service, the Police and Crime Panel should have its membership refreshed to include experts in fire and rescue matters?

No.

This proposal appears to be inconsistent with the current legislative arrangements applicable to membership and maintenance of police and crime panels in that, at present, panel membership criteria does not specifically incorporate any prior requirement for 'policing and crime' expertise.

9. Do you think that where a Police and Crime Commissioner puts in place a single employer for fire and rescue and police services personnel, complaints and conduct matters concerning fire should be treated in the same way as complaints and conduct matters concerning the police?

Yes – consistency of policy and process as far as reasonably possible would be beneficial to facilitate a less complex/less confusing system and, therefore, a clearer understanding by the public of the complaints system(s) applicable to operational services overseen by the Police and Crime Commissioner.

10. Do you agree that Police and Crime Commissioners should be represented on fire and rescue authorities in areas where wider governance changes do not take place?

Yes - but only to have a discretionary opportunity, rather than mandatory statutory requirement, to be represented on the respective FRS authorities across the Thames Valley. This would then represent a sensible proposal to ensure the PCC can influence FRS strategic planning and service delivery in the event that the collective duty to collaborate fails to facilitate and secure more efficient and effective service delivery between the emergency services.

11. Do you agree that the London Fire and Emergency Planning Authority should be abolished and direct responsibility for fire and rescue transferred to the Mayor of London?

This will require a 'London-centric' response; however, we are mindful that the London Fire Brigade and London Fire & Emergency Planning Authority currently provide strategic support on a range of policy areas to the FRS National Coordination Centre role. Reassurances and mitigation measures would be required that such a transfer would not result in an adverse impact on the future effectiveness of the FRS outside of London?

12. In the event that the London Fire and Emergency Planning Authority is abolished, how should responsibility for fire and rescue be incorporated into the mayoral structure?

See previous response

13. To what extent do you think there are implications for local resilience (preparedness, response and recovery) in areas where the Police and Crime Commissioner will have responsibility for police and fire?

We feel there will be no significant impact on police and crime commissioners (PCCs).

PCCs (and Chief Constables) already have clearly defined roles and responsibilities in relation to the Strategic Policing Requirement, a strand of which includes 'civil

emergencies'. PCCs have oversight for their chief constable's delivery of the '5C's within the SPR, including - under 'Consistency' – an existing framework which requires police officers to work effectively with fire officers and ambulance in emergency situations.

PCC's may need to enhance their oversight of the Joint Emergency Services Interoperability Programme (JESIP) at a local/regional level, but this is not insurmountable. Equally, the JESIP governance structure could reflect PCC responsibilities for police and fire.

We are mindful that HMIC (in conjunction with the Chief Fire & Rescue Adviser and Association of Ambulances Chief Executives), recently reviewed JESIP arrangements. Their forthcoming report may cast a further light on the future role of PCC responsibilities; including local resilience (although we note this report will not be for publication?)

Also in relation to local resilience, PCC's are already sighted on the key role played by Local Resilience Forums in which emergency services, local authorities and government agencies combine to support communities in challenging situations.

14. To what extent do you think there are implications for resilience responsibilities in areas where an elected metro mayor is also the Police and Crime Commissioner and responsible for the fire and rescue service?

Police and Fire (plus established relevant local authority partners) already collaborate through Local Resilience Forums; we therefore believe that any changes would have little detrimental impact under such a proposed structure.

15. Are there any other views or comments that you would like to add in relation to emergency services collaboration that were not covered by the other questions in this consultation?

At Thames Valley, neither the PCC nor Chief Constable is convinced that ambulance service control rooms should be merged with police and FRS control rooms. Ambulance service control room operators receive basic medical training to enable them to act as part of a 'triage' function, which would be expensive to deliver for all call operators under collaborative function.

Therefore, the PCC's starting point in any collaboration model is that it should involve a merger/collaboration between police and FRS only, and should *exclude* the ambulance service.

16. Do you think these proposals would have any effect on equalities issues?

None identified