



STAFFORDSHIRE FIRE & RESCUE SERVICE AND POLICE, FIRE & CRIME COMMISSIONER FOR STAFFORDSHIRE

Sustainability Strategy Review

FINAL Internal Audit Report: 3.24/25

21 October 2024

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EXECUTIVE SUMMARY

In line with our scope, included at Appendix F, the overview of our findings is detailed below.

Conclusion: The Strategy developed by Staffordshire Fire and Rescue Service ('SFRS' or 'the Service') is ambitious and demonstrates the commitment of the Service to not only upholding their responsibilities as a fire and rescue service, but also to act as stewards towards the environment and society they operate in. Many of the goals and initiatives as part of the Environmental & Sustainability Strategy 2022 – 2027' (the Strategy) are in alignment with best practice and strive to meet the goals of the Service. As SFRS progresses along their sustainability journey, the continued progress and ultimate success of their Strategy will require a clear overarching direction from leadership. This direction should guide the sustainability priorities through policies and collaborative initiatives to capitalise on efficiencies and reduce duplication of efforts, as well as create a culture of shared responsibility towards sustainability. The overarching direction will also be imperative to help SFRS balance the priorities of operations and sustainability efforts. The analysis and management action that have been presented in this report should be reviewed and utilised by the Service to continue to build on the progress that has been made towards their Strategy and to support an increasingly collaborative and environmentally responsible Service.

Key findings:

1.1 Introduction and project overview

RSM was engaged by SFRS to review and assess the progress made towards achieving the objectives set out in the Strategy as part of the internal audit engagement for the period ended 31 March 2024. The objective of the review was to evaluate the current progress and priority activities against the five themes presented in the Strategy. As strategic priorities and progress are underpinned by strong processes, procedures, ownership, accountability, and leadership; RSM assessed a sixth pillar – 'governance'. Collectively, these are referred to as the 'Six Pillars' throughout this report. The review was therefore organised around the following Six Pillars:

1. Waste Reduction;
2. Reduce our Energy Usage;
3. Air Quality Improvement;
4. Operational Incidents;
5. Green Space Generation; and
6. Governance.

We conducted the following activities in order to achieve the objective of the review:

- **Strategy Review:** A review of the Strategy, as well as other relevant and applicable documentation; including, but not limited to SFRS's Environmental Reports and Environmental Strategy Working Group updates. A list of documents reviewed can be found in Appendix B. Key stakeholder interviews to further review the activities pertaining to the Strategy. A list of interviews and stakeholders can be found in Appendix C;
- **Benchmarking:** Benchmarking of SFRS's Strategy and progress against two fire authorities' (South Yorkshire Fire & Rescue (SYFR) and Greater Manchester Fire & Rescue Service (GMFR)) sustainability / environmental strategies to identify any best practices, challenges, gaps; and overall maturity of information disclosed. Additionally, best practices were identified from a 'large' fire service, London Fire Brigade (LFB), to provide additional insights. The results of the benchmarking exercise are incorporated into our analysis with additional details found in Appendix D;
- **Gap Analysis:** Analysis of the current state of the Service against the Strategy, as well as with reference to the benchmarking, was performed to understand successes, gaps, and potential barriers; and

- **Management Actions:** Based on the Gap Analysis, management actions for improvement were developed to support the Service along their Strategy. Throughout the review, we have referenced and leveraged the [National Fire Chiefs Council \(NFCC\) Environmental Protection Handbook for the Fire and Rescue Service](#), as well as other NFCC guidance on environmental sustainability and climate change, where applicable and appropriate, to incorporate best practices for the fire and rescue services into our review and management actions.

We acknowledge that the Service's sustainability aims run alongside the primary aim of safely protecting life, property, and the environment from fire and other emergencies. Therefore, we recognise that some management actions may need to be considered with the potential implications for this primary aim in mind.

1.2 Key findings and management actions

The findings and management actions presented in this section summarise the information throughout the report. More detailed findings and management actions with suggested timelines and priority levels can be found in Section 2 of this report. From our review, three key priority, overarching themes were identified. Throughout our review, these themes were both directly and indirectly referenced as key challenges, as well as opportunities for the Service to continue to make progress against the Strategy.

Overarching themes

Sustainability Direction from the Top	In order to ensure the success of their environmental strategies, SFRS (and the Commissioner/Force) should implement an overarching direction for their sustainability priorities and initiatives at the Commissioner Office. This should include a level of enforcement as well as cultural tone at the top that is bolstered by clear and well communicated policies around initiatives and priorities to provide the operational teams with the necessary information and direction to implement and integrate environmental strategy across the services.
Shared Services	SFRS and the Force share many services and functions, with critical stakeholders in their sustainability and operational journeys being shared. As it is expected for future additional shared service functions and sites, there is a clear opportunity to pursue shared environmental strategies and initiatives that can lead to greater efficiencies and cost savings. It will be critical that SFRS and the Force quantify these efficiencies and incentives to demonstrate the value in collaboration. This will enable consistent processes, procedures, and policies to be developed across SFRS and Force to support joint progress towards environmental goals.
Private Finance Initiative (PFI) Sites	There are 21 private finance initiative (PFI) sites for SFRS and the Force across Staffordshire, representing more than half of the sites that both services operate. These sites pose challenges, especially related to energy use, waste reduction, and green space generation, due to a lack of control which can slow or halt progress towards sustainability objectives.

Key findings and management actions

Key findings and management actions were compiled based on the assessment and analysis, aligned to the Six Pillars. An assessed progress level, based upon SFRS's current progress against expected progress (i.e. how far along comparator fire services are, progress against targets, year-on-year improvement) was assigned at the pillar level (i.e. topics). The below table summarises the key findings and management actions for each of the Six Pillars.

Overall, the SFRS is at a 'Progressing' level towards their sustainability goals aligned to the Strategy:

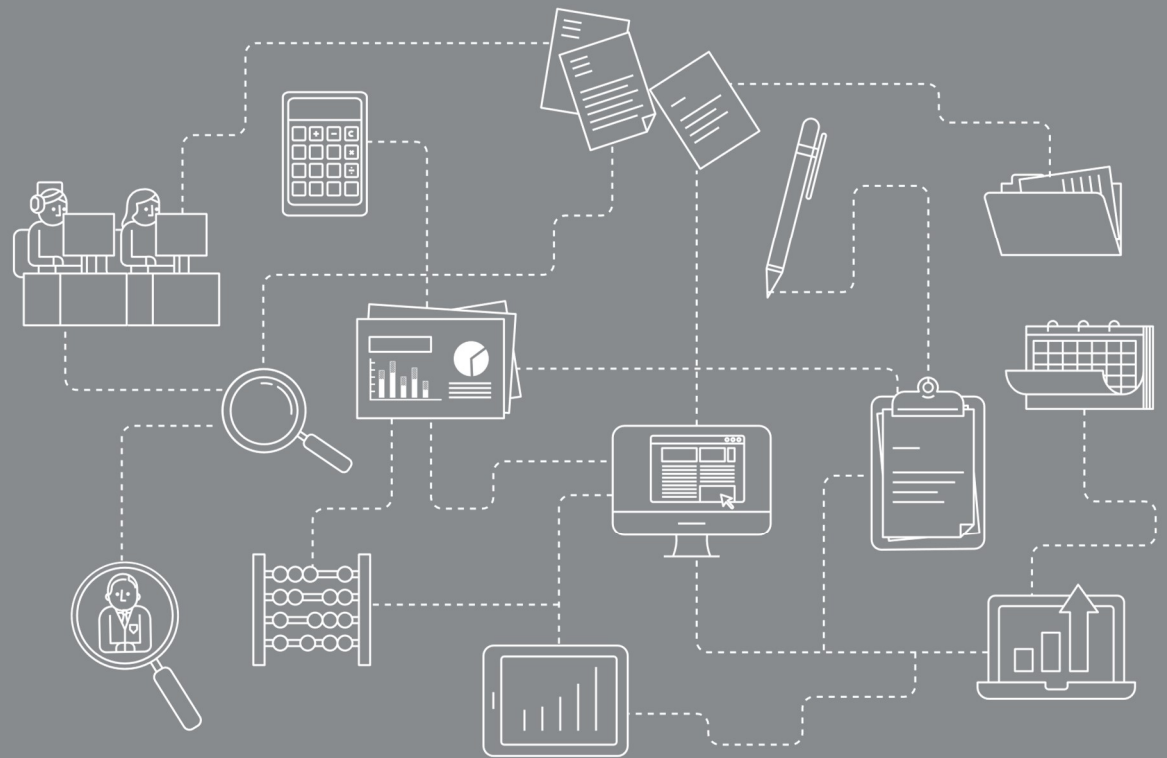
Strategic Pillar	Assessed Progress Level	Key Findings	Management Actions
Waste Reduction	Progressing	- The Service targets zero waste to landfill across its sites, with a majority of waste incinerated and a smaller proportion recycled. - Waste tonnage is monitored and reported under Streamlined Energy and Carbon Reporting (SECR), supported by intelligent data provided by the Service's waste monitoring provider. However, opportunities remain in the utilisation of this data to drive waste policy.	- Integrate the waste management strategy to allow for the utilisation of waste data across the organisation, to inform waste reduction strategies, considering consultation regarding PFI sites. - Set a target for the full elimination of avoidable single use plastics and engage with suppliers to minimise their use where possible. - Conduct a gap assessment between the Environmental Strategy and the Procurement Plan to include procurement provisions to support the reduction of waste.
Reduce our Energy Usage a) Estates	Progressing	- The Service encourages staff to adopt energy-saving behavioural practices, such as switching lights and equipment off when not in use. - Lights and equipment are replaced with more efficient alternatives as part of routine maintenance, contributing to a 25% reduction in energy usage from a 2019/2020 baseline in 2021/2022 as reporting in the 2021-2022 Environmental Report. - On-site renewable energy generation opportunities are being explored, with budget being allocated to the installation of photovoltaic (PV) panels. - There is a lack of an overarching strategy for the decarbonisation of the estate, and limited personnel resource allocated to overseeing measures implemented within estates.	- Develop a heat decarbonisation plan that sets out the achievable transition to lower carbon heating alternatives. This should include an assessment of site emissions and cost estimates for decarbonisation. - Offer carbon literacy training to staff. Initially this could be to management staff and those involved with sustainability but could be offered more widely. - Further formalise risks and benefits associated with energy reduction initiatives and incorporate financial considerations into sustainability decisions, to support in demonstrating the positive case for investment decisions that support the transition. - Continue development of on-site renewable energy at stations where feasible. To support this, consider feasibility analysis to demonstrate the financial and practical suitability of the available options. Consider setting a target for a proportion of consumed energy to be supplied by on-site renewable energy.
Reduce our Energy Usage	Progressing	A procurement plan is in place which facilitates the inclusion of social value sustainability considerations in procurement.	Consider mandating more rigorous sustainability requirements for larger procurement contracts. This could include increasing the social value weighting for contracts of a certain size or mandating a demonstrable commitment to a Net Zero target.

b) Supply chain and Scope 3		• However, the procurement within some departments or stations remains somewhat decentralised and without sufficient oversight. • Scope 3 emissions reporting is currently limited to business travel and waste.	• Many other public sector organisations are mandating procurement contract requirements, such as LFB who mandate that for every contract over £5m, the supplier needs to have a carbon transition plan. • Consider additional processes for seeking validation of suppliers' sustainability commitments that outline recourse if asserted targets are not met. • Consider upskilling or outsourcing to establish a Scope 3 inventory for a greater number of Scope 3 categories.
Air Quality Improvement	Progressing	• A vehicle replacement programme is in place with the aim of transitioning all light fleet vehicles to be ULEV compliant. Opportunities remain in the wider implementation of EV chargers. • The transition of heavy fleet vehicles to lower carbon EV alternatives is being explored in collaboration with the suppliers of these vehicles. Electric response vehicles are being considered, however budgetary and practical challenges remain. The Service is in the process of ordering one response EV vehicle as a pilot. • The Service has a high level of confidence over its reported emissions data from its fleet, due to physical controls within the fuel system. However, more frequent data collection and monitoring may be beneficial.	• Set a target for the full electrification of light fleet vehicles. • Consider staff incentives to encourage further electrification of personal vehicles. • Continue to engage with suppliers to explore emerging technologies that will allow for the decarbonisation of heavy fleet vehicles. Consider interim steps such as hybrid-electric vehicles or switching diesel fuel to hydrogenated vegetable oil (HVO) fuel. • Consider implementing fleet management software to allow for enhanced monitoring of fleet data, with the view of promoting more efficient travel and enhanced vehicle performance.
Operational Incidents	Progressing	• The prevention of incidents is a priority for the Service, with a dedicated education team that inform communities of ways to reduce the risks of fire. These initiatives include education to reduce the risk of accidental dwelling fires and commercial building fires. • The Service engages in collaboration with local groups and education institutions to inform the community and help mitigate the risk of wildfires, such as building strategies for resilience into forest management plans. • There is no quantification of the avoided emissions from educational efforts, however, we are not seeing peer organisations doing this.	• Adopt a data-driven approach to better identify high risk premises to deliver more targeted educational resources. • Consider quantifying or estimating historic and current emissions of fires (both in built environment and wildfires) within Staffordshire to then be able to quantify or estimate the impacts of prevention programs. • Aim to quantify the impacts of educational programmes through monitoring metrics such as public awareness of fire risks or smoke alarm installations. • Explore opportunities to collaborate and share best practices with other fire services in adjacent regions.

Green Space Generation	Progressing	• The Service have been innovative regarding greenspace generation with limited resource, leveraging relationships with wildlife organisations and local councils to hold community and school events, creating green spaces as well as educating communities on the importance of greenspace. • Stations have been communicating the importance of greenspace and biodiversity, encouraging staff to plant trees and incorporate plants in office spaces. • Initiatives are somewhat disparate and there is no formal strategy in place for the development of green spaces or the promotion of biodiversity. • Biodiversity reporting, such as the quantification of likely impacts on species of biodiversity and greenspace initiatives, is not yet a priority for the Service, and knowledge gaps would prevent this being implemented in the near-term.	• Plan to develop an overarching biodiversity and greenspace strategy that demonstrates how the Service plans to protect and enhance wildlife habitats, promote awareness of biodiversity, and promote access for staff to high quality green spaces. This should include the qualification and (if possible) the quantification of the benefits to people and environment. • Consider upskilling to allow for biodiversity reporting (i.e. against recognised frameworks such as the Taskforce for Nature-related Financial Disclosures) and the recognition of how greenspace generation improves health outcomes.
Governance	Progressing	• The Service published their Environmental & Sustainability Strategy in 2022, a comprehensive strategy that sets out the Service's priorities for operating more sustainably. Improvements are categorised under five key pillars, focusing on four areas to create improvements. • Progress against the Strategy is reviewed through the Service's existing governance structure. The Commissioner's Strategic Governance Board will hold the Service accountable for its environmental protection efforts. • Despite a commitment to aligning with the UK Government's Net Zero ambitions, there is a lack of a detailed transition plan laying out the pathway to decarbonisation and how this will practically be achieved. • The risks associated with climate change, such as the risk of increased wildfires, are recognised, however there is a lack of a documented climate change risk management strategy.	• Consider aligning a future sustainability strategy to a recognised sustainability framework, such as the United Nation Sustainable Development Goals (UN SDGs). GMFR's sustainability strategy has been developed aligned to UN SDGs and incorporate wider considerations on biodiversity, going beyond carbon. Additionally, LFB's Sustainable Development Strategy 2023-2025 incorporates the UN SDGs into their goals. • Establish and document the ownership of sustainability initiatives, as well as a rigorous framework to routinely review and monitor progress towards metrics and targets. • Set a formal Net Zero target and develop a climate transition plan to set out how the target will be delivered. The plan should set out time-bound measurable actions towards decarbonisation. The plan should identify and disclose anticipated actions that will support the delivery of Net Zero. • Develop a Climate Change Risk Strategy, either utilising internal resources or in collaboration an external partner. This should include identifying key risks from climate change, identifying and implementing strategies to improve the resilience of the Service, and integrating the strategy into the wider sustainability strategy.

Summary of Actions for Management

01



SUMMARY OF MANAGEMENT ACTIONS

Below we set out our management actions to improve and drive progress towards the Strategy. These management actions are developed based on identified gaps, comparator fire service best practices, NFCC Environmental & Climate Change Guidance and other industry best-practice sustainability guidance, and our unique expertise and experience in providing sustainability-related services to public sector organisations such as SFRS. These management actions are advisory rather than prescriptive and are not fully exhaustive, instead highlighting key actions that we have identified that should drive the Service towards the ambitions of the Strategy. SFRS should ultimately determine the best course of action to drive improvements internally.

The management actions are assigned a priority score of high, medium, or low based on their level of importance to achieving the Service's strategic aims as they relate to sustainability, as well as an 'Expected Level of Investment' which takes into account possible time, cost, and / or resources. A priority of 'High' and an expected level of investment of 'Low' would signify quick win opportunities for the Service. Some areas have a number of actions that can be achieved over time.

Ref	Strategic Pillar / Theme	Action	Priority	Expected Level of Investment	Responsible Owner & Date
1	Overarching Strategy	Increase collaboration with the private entities involved in the private finance initiative (PFI) collaborations. Aim to co-develop environmental strategies and initiatives to enable both parties to meet their strategic, operational, financial, and environmental goals.	High	Low	To be fully determined via the Environment Working Group
2		Formalise the approach to sustainability initiatives at shared services to facilitate greater efficiencies and cost savings at these sites. Where feasible, align the sustainability goals of the SFRS and the Force and define how the risks and rewards of investing in sustainability initiatives are to be distributed. It will be critical to quantify the efficiencies and incentives in order to demonstrate the benefits of collaboration between the services.	High	Medium	To be fully determined via the Environment Working Group
3		Aim to implement an overarching direction with enforcement and governance over the Service's environmental priorities, as well as clear policies and communication around initiatives to provide the 'operations' or 'doers' of the environmental initiatives to implement and integrate environmental strategy across the services.	High	Medium	To be fully determined via the Environment Working Group
4	Waste Reduction	Integrate the waste management strategy to allow for the utilisation of waste data across the organisation, to inform waste reduction strategies, considering consultation regarding private finance initiative (PFI) sites.	Medium	High	To be fully determined via the Environment Working Group

* Refer to Appendix E for more detail

Ref	Strategic Pillar / Theme	Action	Priority	Expected Level of Investment	Responsible Owner & Date
5	Reduce our Energy Usage – Estates	Set a target for the full elimination of avoidable single use plastics and engage with suppliers to minimise their use where possible.	Medium	High	To be fully determined via the Environment Working Group
6		Conduct a gap assessment between the Environmental Strategy and the Procurement Plan to include procurement provisions to support the reduction of waste.	Medium	Low	To be fully determined via the Environment Working Group
7		Develop a heat decarbonisation plan that sets out the achievable transition to lower carbon heating alternatives. This should include an assessment of site emissions and cost estimates for decarbonisation. The approach should be consistent but consider the unique aspects of each site. The plan should outline steps to decarbonisation with best practices, also considering how each site is able or unable to meet those targets and what the alternatives are. This strategy can be developed and improved over time.	High	High	To be fully determined via the Environment Working Group
8		Offer carbon literacy training to staff. Initially this could be to management staff and those involved with sustainability but could be offered more widely.	Low	Low	To be fully determined via the Environment Working Group
9		Further formalise risks and benefits associated with energy reduction initiatives and incorporate financial considerations into sustainability decisions, to support in demonstrating the positive case for investment decisions that support the transition.	High	Medium	To be fully determined via the Environment Working Group
10	Reduce our Energy Usage – Supply Chain & Scope 3	Continue development of on-site renewable energy at stations where feasible. To support this, consider feasibility analysis to demonstrate the financial and practical suitability of the available options. Consider setting a target for a proportion of consumed energy to be supplied by on-site renewable energy.	High	High	To be fully determined via the Environment Working Group
11		Consider mandating more rigorous sustainability requirements for larger procurement contracts. This could include increasing the social value weighting for contracts of a certain size or mandating a demonstrable commitment to a Net Zero target. Many other public sector organisations are mandating procurement contract requirements, such as London Fire Brigade (LFB) who mandate that for every contract over £5m, the supplier needs to have a carbon transition plan.	Medium	Low	To be fully determined via the Environment Working Group

* Refer to Appendix E for more detail

Ref	Strategic Pillar / Theme	Action	Priority	Expected Level of Investment	Responsible Owner & Date
12	Air Quality Management	Consider additional processes for seeking validation of suppliers' sustainability commitments that outline recourse if asserted targets are not met.	Medium	Low	To be fully determined via the Environment Working Group
13		Consider upskilling to establish a Scope 3 inventory for a greater number of Scope 3 categories.	Medium	Low	To be fully determined via the Environment Working Group
14		Set a target for the full electrification of light fleet vehicles.	Medium	Medium	To be fully determined via the Environment Working Group
15		Consider staff incentives to encourage further electrification of vehicles.	Low	Low	To be fully determined via the Environment Working Group
16		Continue to engage with suppliers to explore emerging technologies that will allow for the decarbonisation of heavy fleet vehicles. Consider interim steps such as hybrid-electric vehicles or switching diesel fuel to hydrogenated vegetable oil (HVO) fuel.	Low	Medium	To be fully determined via the Environment Working Group
17		Consider implementing fleet management software to allow for enhanced monitoring of fleet data, with the view of promoting more efficient travel and enhanced vehicle performance.	Low	Medium	To be fully determined via the Environment Working Group
18	Operational Incidents	Adopt a data-driven approach to better identify high risk premises to deliver more targeted educational resources.	Medium	Medium	To be fully determined via the Environment Working Group
19		Consider quantifying or estimating historic and current emissions of fires (both in built environment and wildfires) within Staffordshire to then be able to quantify or estimate the impacts of prevention programs.	Medium	High	To be fully determined via the Environment Working Group
20		Aim to quantify the impacts of educational programmes, through monitoring metrics such as public awareness of fire risks or smoke alarm installations.	Medium	Medium	To be fully determined via the Environment Working Group
21		Explore opportunities to collaborate and share best practices with other fire services in adjacent regions.	Medium	Low	To be fully determined via the Environment Working Group
22	Green Space Generation	Plan to develop an overarching biodiversity and greenspace strategy that demonstrates how the Service plans to protect and enhance wildlife habitats, promote awareness of biodiversity, and promote access for staff to high quality green spaces. This should include the qualification and (if possible) the quantification of the benefits to people and environment.	Medium	Medium	To be fully determined via the Environment Working Group

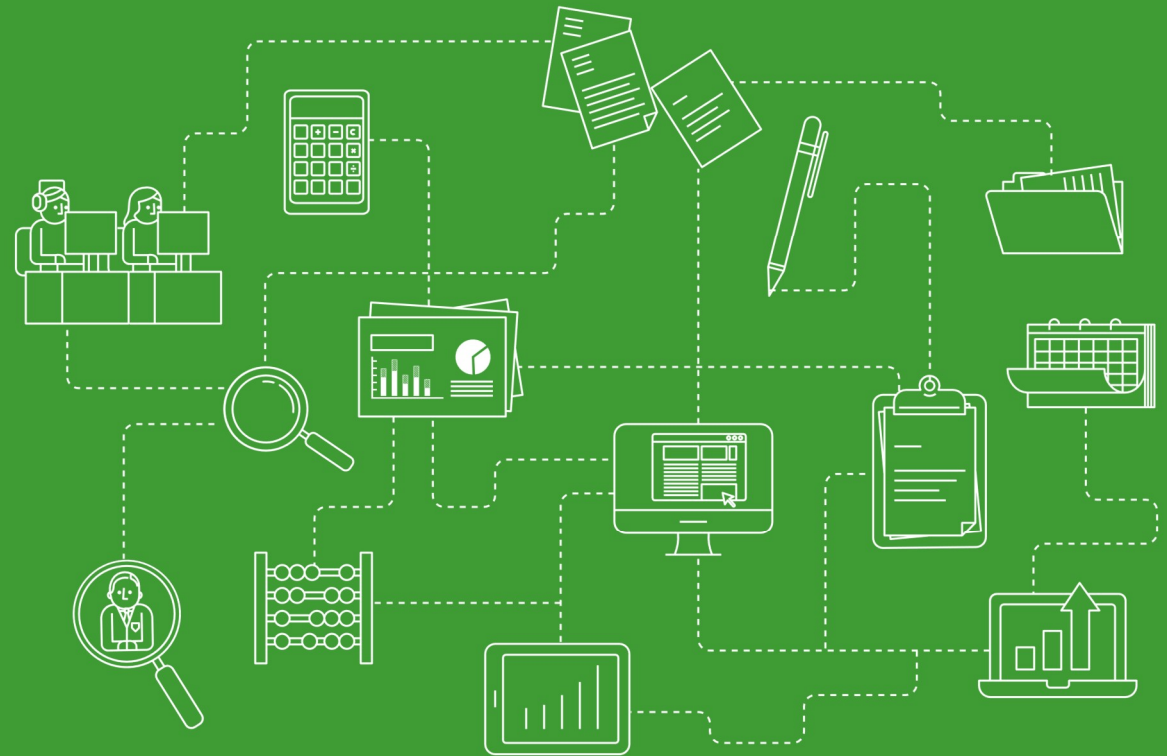
* Refer to Appendix E for more detail

Ref	Strategic Pillar / Theme	Action	Priority	Expected Level of Investment	Responsible Owner & Date
23	Governance	Consider upskilling to allow for biodiversity reporting (i.e. against recognised frameworks such as the Taskforce for Nature-related Financial Disclosures) and the recognition of how greenspace generation improves health outcomes.	Medium	Low	To be fully determined via the Environment Working Group
24		Consider aligning a future sustainability strategy to a recognised sustainability framework, such as the United Nation Sustainable Development Goals (UN SDGs). Greater Manchester Fire and Rescue Service's (GMFR's) sustainability strategy has been developed aligned to UN SDGs and incorporate wider considerations on biodiversity, going beyond carbon. Additionally, London Fire Brigade's (LFB's) Sustainable Development Strategy 2023-2025 incorporates the UN SDGs into their goals.	Medium	Low	To be fully determined via the Environment Working Group
25		Establish and document the ownership of sustainability initiatives, as well as a rigorous framework to routinely review and monitor progress towards metrics and targets.	High	Low	To be fully determined via the Environment Working Group
26		Set a formal Net Zero target and develop a climate transition plan to set out how the target will be delivered. The plan should set out time-bound measurable actions towards decarbonisation. The plan should identify and disclose anticipated actions that will support the delivery of Net Zero.	High	High	To be fully determined via the Environment Working Group
27		Develop a Climate Change Risk Strategy, either utilising internal resources or in collaboration an external partner. This should include identifying key risks from climate change, identifying and implementing strategies to improve the resilience of the Service, and integrating the strategy into the wider sustainability strategy.	High	Medium	To be fully determined via the Environment Working Group

* Refer to Appendix E for more detail

Detailed Findings and Actions

02



DETAILED FINDINGS AND ACTIONS

2.1 Environmental Strategy 2022-27

We have reviewed SFRS's Environmental Strategy 2022-27, in addition to other supporting documents listed in Appendix B, to assess progress towards the five pillars of the Strategy, as well as the maturity of the governance arrangements in place at SFRS. Additionally, we conducted eight interviews with key stakeholders, listed in Appendix C, which form the Environmental Strategy Working Group to understand the progress made against the Strategy and any existing or anticipated risks, opportunities, challenges, and changes.

2.2 Sustainability Direction from the Top

It will be critical to implement an overarching direction with enforcement / cultural governance over top of their environmental priorities, as well as clear policies and communication around initiatives to provide the 'operations' / 'doers' of the environmental initiatives to implement and integrate environmental strategy across the services. Additionally, while both Fire and Police have their own Environmental Strategies, the independent nature of their operations and a lack of 'one source of truth or governance' at the top create risks of duplication, siloes, inconsistencies / inefficiencies, and overall lack of buy-in into environmental priorities.

2.3 Shared Services

With the existing services and planned additional sites moving to shared services between SFRS and the Police Force, there is a clear opportunity to develop environmental strategies and initiatives that can lead to greater efficiencies and cost savings. However, it will be critical that these efficiencies and financial incentives are quantified in order to demonstrate the value in collaboration between SFRS and the Police Force. This will also enable consistent processes, procedures, and policies to be developed across SFRS and the Police Force to support joint progress towards environmental goals.

2.4 Private Finance Initiative (PFI) Sites

The PFI sites pose a challenge as well as an opportunity from an environmental perspective. Challenges exist due to a lack of control which can slow or halt progress on environmental priorities. However, from a strategic perspective, there is an opportunity to increase collaboration with PFI sites to co-develop environmental strategies and initiatives that will enable both parties to meet their strategic, operational, financial, and environmental goals. Additionally, there is the opportunity going forward to include more specific environmental (and broader ESG) provisions in their PFI contracts to enable further environmental progress.

2.5 Gap Assessment and Best Practice

The results of our analysis, namely the Strategy Review, Benchmarking, and Gap Analysis findings are provided in the tables below. Findings include, but are not restricted to, sub-topics assessed through the benchmarking exercise. The below findings also relate to key findings that are overarching throughout the Service's approach to sustainability. Each pose challenges in implementing an effective strategy whilst providing opportunities for development. The findings were compiled and categorised around the Six Pillars to provide an overview of assessed progress level, key gaps, and identified best practices from benchmarking.

It is worth noting that the assessed progress level is based upon SFRS's current position against the expected progress (i.e. how far along comparator fire services are, progress against targets, year-on-year improvement). The have been assigned at the pillar level (i.e. topics) based on the following evaluation criteria:

Assessed Progress Level	
Lagging	Minimal and / or slow progress and / or negative progress towards stated objectives and associated targets. Strategic objectives are not feasible within current state.
Progressing	Year-on-year positive progress towards stated objectives and associated targets. Best practices, enhanced processes, and / or further investment can be leveraged to continue to make progress.
Achieving	Meeting / exceeding objectives and associated targets. Actions and results are leading peer fire services and meeting broader socio-economic and environmental targets.

2.5.1 Waste Reduction: Assessed Progress Level - **Progressing**

Sub-Topics	Current State Findings	Key Identified Gaps	Benchmarking Best Practices
Resource Management / Waste Production	There is a zero waste to landfill approach in place across the Service. The most recent published data reveals 85% of waste was incinerated and 15% recycled. A circular economy approach is adopted where possible, such as the donation of retired fire equipment to be repurposed.	Due in part to limited control over PFI sites, there is a lack of a unifying approach to waste management and reduction. Despite the collection of detailed waste data at most sites, these data do not inform practices aimed at reducing waste streams across the Service.	GMFR has an overarching strategy that aims to develop a high-level understanding of total waste generation in order to develop initiatives that enable implementation of the waste hierarchy.
	The Service is minimising the use of single-use plastics across sites, through the use of plastic cups at water coolers and issuing reusable water bottles.	No gaps identified.	LFB has eradicated all unavoidable single-use plastics within its catering contracts.
Waste Monitoring	Waste tonnage is monitored and reported as part of Scope 3 reporting under Streamlined Energy and Carbon Reporting (SECR). Intelligent waste monitoring data is provided by the Service's new waste monitoring provider, though this is not comprehensive across the service due to the subcontracting of waste removal at some sites.	No gaps identified.	SYFR is rolling out improved recycling facilities and holding regular meetings with their general waste and recycling contractors. They have successfully applied for a project to identify waste streams and develop an overarching waste strategy.

2.5.2 Reduce Our Energy Usage: Assessed Progress Level - **Progressing**

Estates Energy Usage			
Sub-Topics	Current State Findings	Key Identified Gaps	Benchmarking Best Practices
Behavioural Practices	The Service encourages staff to adopt energy-saving behavioural practices, such as switching lights and equipment off when not in use.	There is no formal carbon literacy training offered to staff.	
Emissions Reporting and Strategy	Scope 1 and Scope 2 emissions are reported under SECR. Targets have been set to reduce overall electricity and gas consumption.	There is a lack of an overarching strategy for the decarbonisation of the estate, and limited personnel resource allocated to overseeing measures implemented within estates. Therefore, much of the onus falls on individual departments and stations to plan and implement initiatives that contribute to the broader aims of the Service's environmental strategy.	SYFR has developed a data-driven heat decarbonisation plan, including initiatives to build more energy efficient new stations and reduce overall direct buildings emissions by 75%. LFB has installed an air source heat pump at their first zero carbon fire station. These are being trialled more widely at other stations and 15 boilers have been replaced thus far.
Efficiency Measures	Lights and equipment are replaced with more efficient alternatives as part of routine maintenance, contributing to a 25% reduction in energy usage from a 2019/2020 baseline in 2021/2022 as reporting in the 2021-2022 Environmental Report.	Efficiency measures do not currently form part of an overarching decarbonisation strategy.	
On-Site Renewable Energy Generation	The Service are beginning to explore on-site renewable energy generation opportunities, with budget being allocated to the installation of photovoltaic (PV) panels. The financial implications, including payback periods, have been considered in the allocation of funds for this project.	There are no targets in place for on-site renewable energy generation.	Other services are further developed in the adoption and expansion of on-site renewable energy. LFB is producing in excess of 11% of its consumed electricity from on-site renewables and SYFR has set a target of 10% of energy generated from renewables by 2026.

Supply Chain and Scope 3			
Sub-Topics	Current State Findings	Key Identified Gaps	Benchmarking Best Practices
Procurement	The Service implements a three-year procurement plan, which facilitates the inclusion of social value and sustainability considerations in procurement. Variable weighting is given to these topics depending on the size and nature of the contract. Sustainability is given greater weighting and consideration where there are potentially material negative impacts, for example the procurement of waste services that minimise the production of toxic waste. The Service has sought to be innovative in its adoption of more sustainable alternatives for products and machinery. This has included becoming the first service to adopt biodegradable foam, and seeking electric alternatives to equipment and water craft.	Despite the Strategy recognising the importance of integrating consistent procurement procedures across the Service, procurement within some departments or stations remains decentralised and without sufficient oversight to ensure the Service's social value and sustainability standards are met by all suppliers.	GMFR have set a target of 2026 for 80% of their supply chain to have a demonstrable commitment to a net zero target. LFB have a procurement plan that requires every supplier with a new contract >£5m must produce an organisational carbon reduction plan. All new contracts with the Service are also to require freight and servicing vehicles to be zero emissions by 2025.
Scope 3 Emissions Reporting	Emissions associated with business travel and waste are monitored and reported.	Further data collection and upskilling to allow for the development of a more comprehensive Scope 3 inventory are not currently prioritised or sufficiently resourced.	LFB have engaged in a collaborative study to establish a Scope 3 emissions baseline on a spend-based analysis.

2.5.3 Air Quality Management: Assessed Progress Level - **Progressing**

Sub-Topics	Current State Findings	Key Identified Gaps	Benchmarking Best Practices
Light Fleet	A vehicle replacement programme is in place with the aim of transitioning all light fleet vehicles to be ULEV compliant. This is achievable with the shift of car manufacturers towards EVs. The Service has a number of EVs and plug-in hybrids currently and is shifting away from plug-in hybrids as technology improves.	Opportunities remain in the identification of potential benefits for the wider implementation of EV chargers.	GMFR are investing widely in EVs for its fleet, as well as in charging infrastructure. They are investing in more efficient frontline response vehicles where EVs are not practicable. SYFR have installed telematics across its fleet to identify and minimise unnecessary journeys. They have also begun surveying sites to assess the potential for the installation of EV charging infrastructure.
Heavy Fleet	The transition of heavy fleet vehicles to lower carbon EV alternatives is being explored in collaboration with the suppliers of these vehicles. Electric response vehicles are being considered, however budgetary and practical challenges remain.	There is a lack of a comprehensive strategy to support the repurposing of heavy fleet vehicles.	LFB have taken part in an exploratory project to trial a Zero Emission Capable Pumping Appliance (ZECPA) as a step towards the decarbonisation of heavy response vehicles.
Fuel Data	The Service has a high level of confidence over its reported emissions data from its fleet, due to physical controls within the fuel system.	The inventory calculation for fleet emissions is currently only undertaken annually, limiting the potential for identification of trends within the year. However, a commitment has been made to increase the frequency of this to be quarterly.	More regular monitoring of fleet emissions is conducted at benchmarked services.

2.5.4 Operational Incidents: Assessed Progress Level - **Progressing**

Sub-Topics	Current State Findings	Key Identified Gaps	Benchmarking Best Practices
Prevention Strategy	The prevention of incidents is a priority for the Service, with a dedicated education team that inform communities of ways to reduce the risks of fire. These initiatives include education to reduce the risk of accidental dwelling fires and commercial building fires.	There is a lack of documented consideration of how fire prevention and education efforts may be impacted by climate change.	LFB have a rigorous risk assessment process that identifies fire and non-fire emergency risk factors and how these evolve over time, including the emergence of novel risks such as changes in the built environment and climate change. This process informs the Service's risk management plan that engages with the community to minimise risks.

Sub-Topics	Current State Findings	Key Identified Gaps	Benchmarking Best Practices
			SYFR adopt a data-driven strategy to identify high-risk areas to target educational and practical support, such as tailored fire risk advice, escape plans, and safety equipment. Collaborative education programmes are developed with input from the police and fire community safety department. GMFR's risk management and response plans include the consideration of contingency capacity, allowing for the recruiting of additional firefighters and enhancement of training procedures.
Education	Overall, the purpose of the Operational Incidents team is to reduce the number of times that the fire engines are getting called out to an event. The Service engages in collaboration with local groups and education institutions to inform the community and help mitigate the risk of wildfires, such as building strategies for resilience into forest management plans.	There is no quantification of the avoided emissions from educational efforts, however, we are not seeing peer organisations doing this.	SYFR implements a risk-based approach to inspecting domestic and commercial premises, focusing on ensuring compliance with fire safety regulations and higher risk premises. The Service have recognised increased smoke alarm installations as a result of their educational programmes.

2.5.5 Greenspace Generation: Assessed Progress Level - **Progressing**

Sub-Topics	Current State Findings	Key Identified Gaps	Benchmarking Best Practices
Community Outreach	The Service have been innovative regarding greenspace generation with limited resource, leveraging relationships with wildlife organisations and local councils to hold community and school events, creating green spaces as well as educating communities on the importance of greenspace.	Despite several positive initiatives, these are somewhat disparate and there is no formal strategy in place for the development of green spaces or the promotion of biodiversity.	GMFR highlight in their outreach the importance of preventing wildfire incidents, due to their displacement or destruction of wildlife, damage to peatlands crucial for carbon storage, and risks to human health. GMFRS's wider initiatives align with Greater Manchester's Five-Year Environment Plan, aiming to protect and enhance natural assets.

Sub-Topics	Current State Findings	Key Identified Gaps	Benchmarking Best Practices
Staff Education	Stations have been communicating the importance of greenspace and biodiversity, encouraging staff to plant trees and incorporate plants in office spaces.	Biodiversity reporting, such as the quantification of likely impacts on species of biodiversity and greenspace initiatives, is not yet a priority for the Service, and knowledge gaps would prevent this being implemented in the near-term.	GMFR supports the local combined authority's biodiversity initiatives, including ensuring development projects contribute to a net gain in biodiversity, improving green spaces on their estate to benefit biodiversity and overall health and well-being, and collaborating with community groups and grassroots organizations to support local biodiversity initiatives. Biodiversity impacts are assessed throughout their value chain and investment activities, and measures are implemented to mitigate negative impacts.

2.5.6 Governance: Assessed Progress Level - **Progressing**

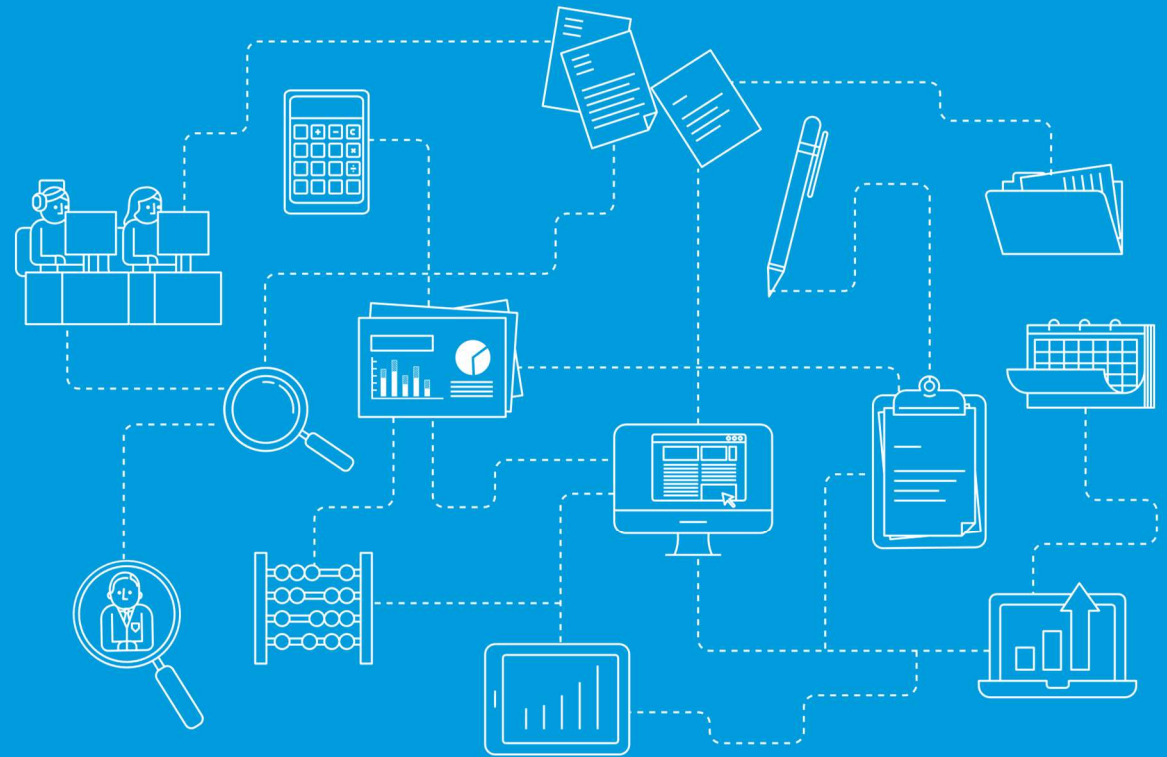
Sub-Topics	Current State Findings	Key Identified Gaps	Benchmarking Best Practices
Sustainability Strategy	The Service published their Environmental & Sustainability Strategy in 2022, a comprehensive strategy that sets out the Service's priorities for operating more sustainably. Improvements are categorised under 5 key pillars, focusing on 4 areas to create improvements.	No gaps identified.	GMFR's sustainability strategy is aligned to the local combined authority strategic plan. This plan has been developed through extensive stakeholder engagement, and clearly defines sustainability objectives and how they plan for them to be achieved and is aligned to the United Nation Sustainable Development Goals (UN SDGs). As part of the strategy, five priorities are set, against which progress is measured and reported quarterly.

Sub-Topics	Current State Findings	Key Identified Gaps	Benchmarking Best Practices
Governance of the Strategy	Progress against the Strategy, such as the attainment of energy and emissions reduction goals, is reviewed through the Service's existing governance structure. The Commissioner's Strategic Governance Board will hold the Service accountable for its environmental protection efforts.	No gaps identified.	At LFB, a sustainable development team, with support from departments and internal working groups, is responsible for the day-to-day management of sustainability issues within the Service, including the review of progress towards metrics and targets. The Commissioner's Board is responsible for reviewing policy, strategy and performance related to sustainability, whilst a Fire and Resilience Board provides scrutiny and high-level oversight of strategic delivery. All Board reports are required to detail the sustainable development implications of the issues addressed in the report, to ensure sustainability is considered in all major decisions.
Net Zero and Transition Plan	The Service has asserted a commitment to achieving change in line with the UK Government's Net Zero target of 2050. The Strategy includes targets for reductions in electricity and gas usage by 10% and 20%, respectively.	There is a lack of a detailed transition plan laying out the pathway to decarbonisation and how this will practically be achieved. Despite asserting an alignment to the UK Government's 2050 Net Zero ambitions, no firm target has been detailed and there are no interim targets set.	SYFR has set a Net Zero target of 2040 for Scopes 1 and 2, with interim targets for an 18% reduction by 2026 and 45% emissions reduction by 2030. GMFR is targeting carbon neutrality by 2038 for Scopes 1 and 2, with an interim target of 50% reduction by 2026. LFB has an interim target of 2030 with a number of interim targets in place.
Risk Management	The Service recognises within the Strategy the risks associated with climate change, and how these might affect the Service. For example, it recognises how the increased frequency of extreme high temperatures and drought events may drive more extreme wildfires.	There is a lack of a documented climate change risk management strategy.	SYFR held a climate change risk workshop to identify and manage the impacts of climate change. They now recognise and manage climate change as a corporate risk and have issued a heatwave contingency plan. GMFR have plans to develop a comprehensive climate change adaptation strategy by 2026.

Sub-Topics	Current State Findings	Key Identified Gaps	Benchmarking Best Practices
Shared Services	A number of services and buildings are shared by the fire and police services. This gives rise to opportunities for the sharing of knowledge and resource in the delivery of sustainability initiatives.	There is currently not an integrated approach to sustainability shared across the fire and police services, creating uncertainty regarding the risks and rewards associated with implementing sustainability initiatives.	The sustainability strategy in place at GMFR is shared across the Greater Manchester Combined Authority, allowing for the sharing of resource and aligning distinct organisations towards common goals.

Appendices

03



APPENDIX A: GLOSSARY

- **Biodiversity:** The variety of plant and animal life in the world or in a particular habitat, a high level of which is usually considered to be important and desirable.
- **EVs:** Electric vehicles.
- **GMFR:** Greater Manchester Fire and Rescue Service.
- **HVO Fuel:** Hydrogenated Vegetable Oil (HVO) is a fossil-fuel free paraffinic diesel-like fuel that can directly replace diesel fuel in plant and equipment. The fuel is renewable and has a substantially lower emissions factor than traditional diesel fuel.
- **LFB:** London Fire Brigade.
- **NFCC:** National Fire Chiefs Council (incorporating the [National Fire Chiefs Council \(NFCC\) Environmental Protection Handbook for the Fire and Rescue Service](#), as well as other NFCC guidance on environmental sustainability and climate change, such as the [NFCC Environment Sustainability and Climate Change Toolkit](#)
- **PFI:** Private Finance Initiative.
- **PV panels:** Photovoltaic (PV) panels.
- **Scope 1 emissions:** Direct emissions from sources that are owned or controlled by the company, for example, emissions from combustion in owned or controlled boilers, furnaces, vehicles, etc.
- **Scope 2 emissions:** Emissions from the generation of purchased energy consumed by the company, for example, purchased electricity which is defined as electricity that is purchased or otherwise brought into the organisational boundary of the company. Scope 2 emissions physically occur at the facility where electricity is generated.
- **Scope 3 emissions:** All indirect emissions (not included in scope 2) that occur in the value chain of the organisation, including both upstream and downstream emissions. Scope 3 emissions are a consequence of the activities of the company but occur from sources not owned or controlled by the company. Some examples are extraction and production of purchased materials; transportation of purchased fuels; and use of sold products and services.
- **SECR:** Streamlined Energy and Carbon Reporting [Environmental reporting guidelines: including Streamlined Energy and Carbon Reporting requirements - GOV.UK \(www.gov.uk\)](#).
- **SYFR:** South Yorkshire Fire and Rescue.
- **ULEV:** Ultra-low emission vehicles.
- **UK Government's Net Zero target of 2050:** This relates to the Government's strategy that sets out the policies and proposals for decarbonising all sectors of the UK economy to meet its Net Zero target by 2050 [Net Zero Strategy: Build Back Greener - GOV.UK \(www.gov.uk\)](#).
- **ZECA:** Zero Emission Capable Pumping Appliance.

APPENDIX B: DOCUMENTS REVIEWED

Documents were provided to us by SFRS via email and were reviewed through analysis against recognised frameworks, industry best practices, and utilising RSM's ESG team's industry experience.

Documents reviewed were:

- Environmental and Sustainability Strategy 2022-2027;
- Environmental Strategy Working Group Update 2023;
- 2021-22 Environmental Report;
- Safety Plan 2020-2024;
- Report on sustainability and cost savings for JETS April 2024;
- Prevention, Partnerships and Safeguarding Strategy 2024-2028; and
- Green Space Toolkit.

APPENDIX C: INTERVIEWS CONDUCTED

Interviews were conducted with key stakeholders at the Service to understand the progress made towards the Strategy:

Participants	Date	Topic
Louise Clayton	18 June 2024	Office Of Staffordshire Commissioner For Police, Fire And Rescue And Crime (Overarching Strategy And Priorities For Staffordshire Police / Fire)
Lindsey Reed, Dan Lycett, Fiona Robinson	24 June 2024	Energy Use Reduction (Facilities / Estates, Renewable Energy, Emissions)
Dez Stoddart, Jim Bywater	24 June 2024	Air Quality Management (Fleet, Fuel, Mileage, Vehicle Electrification)
David Greensmith	25 June 2024	Finance (Financing Sustainability Initiatives, Cost Reductions)
James Green, Caz Firkins	4 July 2024	Greenspace Generation (Wellbeing, Culture, Behaviour, Buy-In, Biodiversity)
Helen Holden, Dan Lycett, Caz Firkins	5 July 2024	Waste Reduction (Waste, Recycling, Procurement)
Chris Craddock	16 July 2024	Emergency Response Team
Carmel Warren	5 August 2024	Operational Incidents (Wildfire / Building Fire Prevention, Community Outreach)

APPENDIX D: BENCHMARKING RESULTS

The overall results from our benchmarking assessment are detailed below.

SFRS's Strategy was benchmarked against SYFR and GMFR to understand best practices, level of maturity, progress against targets and objectives, and challenges / successes of two comparable fire services. Additionally, we have included a 'large' fire service, namely LFB, to provide additional best practices and potential aspirational strategic priorities for SFRS.

SYFR, GMFR, and LFB were scored in the benchmarking based on publicly disclosed and available information, including web pages, governance documents, policies and news articles. SFRS was scored for each benchmarked topic based on the documentation received and reviewed as part of the Strategy review.

Benchmarking focused on the Six Pillars as topics, with relevant sub-topics, as shown in the table below, considered where applicable:

Pillar (Topics)	Sub-Topics	
Waste Reduction	1. Resource Management / Waste Production 2. Recycling 3. Waste Monitoring	
Reduce our Energy Usage	4. Fleet (Scope 1) 5. Fuel Usage (Scope 1) 6. Purchased Electricity (Scope 2)	7. On-site Renewables (Scope 2) 8. Purchased Goods & Services (Scope 3) 9. Commuting / Business Travel (Scope 3)
Air Quality Improvement	10. Travel & Transportation	
Operational Incidents	11. Prevention Strategies 12. Mitigation Strategies	
Green Space Generation	13. Engagement & Collaboration 14. Tree Planting & Biodiversity	
Governance	15. Strategic Plan 16. Governance Structure & Leadership 17. Risk Management	18. Net Zero Ambitions 19. Transition Plan

The criteria for scoring are outlined below. The maximum available score is 57 for each institution. Please note, our review only reflects the latest publicly available information from the list of institutions, and therefore the assigned scores are indicative but not conclusive of an institution's overall progress towards any sustainability topic. The benchmarking exercise identified examples of good practices that can be referenced for SFRS's Strategy and activities.

Score	Criteria for Scores
0	No substantial disclosure
1	Minimal disclosure with generic narrative
2	Thorough disclosure with case study examples or metrics and targets
3	Thorough disclosure, with case study examples, or metrics and targets with demonstrated year-on-year improvement

The outcome of our benchmarking exercise identified the following:

Pillar	Sub-Topic	SFRS	SYFR	GMFR	LFB
Waste Reduction	Resource Management / Waste Production	1	0	2	2
	Recycling	1	2	0	1
	Waste Monitoring	0	1	1	2
Reduce our Energy Usage	Fleet	2	2	2	2
a) Scope 1	Fuel Usage	2	2	3	2
Reduce our Energy Usage	Purchased Electricity	1	2	3	2
b) Scope 2	On-Site Renewables	1	2	2	3
Reduce our Energy Usage	Purchased Goods And Services	2	2	2	2
c) Supply Chain and Scope 3	Commute / Business Travel	2	1	1	3
Air Quality Improvement	Travel & Transportation	2	2	1	2
Operational incidents	Prevention Strategies	2	2	2	2

Pillar	Sub-Topic	SFRS	SYFR	GMFR	LFB
	Mitigation Strategies	2	2	2	2
Greenspace generation	Engagement And Collaboration	2	2	2	2
	Tree Planting And Biodiversity	2	1	2	2
Governance	Strategic Plan	2	1	3	2
	Governance Structure And Leadership	2	1	1	2
	Net Zero Ambitions	1	2	2	3
	Transition Plan	0	1	0	2
	Risk Management	0	2	2	2
Total		27	30	33	40

APPENDIX E: CATEGORISATION OF FINDINGS

The following table highlights the number and categories of management actions made as a result of this review.

Theme	Agreed actions		
	Low	Medium	High
Overarching Strategy	0	0	3
Waste Reduction	0	3	0
Reduce our Energy Usage - Estates	1	0	3
Reduce our Energy Usage – Supply Chain & Scope 3	0	3	0
Air Quality Management	3	1	0
Operational Incidents	0	4	0
Green Space Generation	0	2	0
Governance	0	1	3
Total	4	14	9

APPENDIX F: SCOPE

The scope below is a copy of the original document issued.

In order to support Staffordshire Fire & Rescue Service's ("SFRS") with their sustainability and environmental agenda, RSM reviewed the progress made against the five pillars identified in SFRS's Environmental & Sustainability Strategy 2022 – 2027 ("the Strategy"), as well as the governance the underpins these objectives. These pillars ("the Six Pillars") are listed below:

1. Waste Reduction;
2. Reduce our Energy Usage;
3. Air Quality Improvement;
4. Operational Incidents;
5. Green Space Generation; and
6. Governance.

RSM leveraged the [National Fire Chiefs Council \(NFCC\) Environmental Protection Handbook for the Fire and Rescue Service](#), as well as other NFCC guidance on environmental sustainability and climate change, such as the [NFCC Environment Sustainability and Climate Change Toolkit](#), where applicable and appropriate

The work performed as part of this review was undertaken across four distinct stages with the methodology for each stage detailed in this section.

Limitations

The following limitations apply to the scope of our work:

- The scope of our work is limited to the areas outlined above;
- We did not provide an opinion or assurance on the organisation's Strategy and GHG report;
- We did not provide assurance on the appropriateness of the Strategy and GHG report;
- We did not test the accuracy of any data we are provided with during the fieldwork;
- This is an advisory review therefore no formal assurance opinion is provided;
- The results of our work were reliant on the quality and completeness of the information provided to us; and
- This review was conducted remotely.
- Our work does not provide absolute assurance that material errors, loss or fraud do not exist.

Draft report issued	2 October 2024
Responses received	18 October 2024

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Final report issued	21 October 2024
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Client sponsor	David Greensmith, Director of Finance
Distribution	David Greensmith, Director of Finance

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