

Decision Note – CRMP Extension



STAFFORDSHIRE COMMISSIONER
Police | Fire and Rescue | Crime

REQUEST FOR DECISION BY THE STAFFORDSHIRE COMMISSIONER

	Policing:	Crime:	Fire & Rescue:
This decision relates to:			X

APPROVAL (for completion by Staffordshire Commissioner only)

Rationale for approval

STAFFORDSHIRE COMMISSIONER

Signature

Date 25/04/2023

Date decision required by:


If an urgent approval is required, please state reasons:

For completion by Staffordshire Commissioner's Office only:-

Decision Number: SCF/D/202324/001

Date Received: 13 June 2023

	Yes	No
Has the required decision been considered under the guidance of the Staffordshire Commissioner's Decision Making Policy?	Yes	
Has the required decision been deemed to be a Key Decision as defined within the Staffordshire Commissioner's Decision Making Policy?	Yes	
Who is empowered to make the required decision?		
Staffordshire Commissioner		

Title	Proposed extension to term of the Community Risk Management Plan (Safety Plan 2020-2024)		
Summary:	A request for a decision from the Staffordshire Commissioner as to whether the Service will now be required to extend the period of its current Community Risk Management Plan (Safety Plan) 2020-2024 until 31st December 2024.		
Recommendation:			
Chief Executive			
Signature		Date	25/04/2023

REPORT AND ADVICE TO THE STAFFORDSHIRE COMMISSIONER

1. Introduction and background

The Fire and Rescue National Framework for England 2012 (updated May 2018) requires that each Fire and Rescue Service produce a Community Risk Management Plan (CRMP).

A request for decision by the Staffordshire Commissioner as to whether the Service will now be required to extend the period of its current CRMP (Known as the Safety Plan) 2020-2024 until 31st December 2024. This will allow any potential new Police, Fire and Crime Commissioner some time to understand and approve the new Community Risk Management Plan (CRMP) for 2025-2028 once they take office following the elections in May 2024. This will also ensure that the 4 year CRMP aligns with the term of office following the extension due to COVID-19.

Full details in Section 9: Supporting Paper- outlining all implications.

2. Issues for consideration

The requirement to change the timescales of the existing CRMP from its current planned introduction in April 2024.

The potential impacts from HMICFRS following an extension to the current CRMP.

3. What other options have been considered?

Maintaining the current projected timeline for preparing a new Community Risk Management Plan to be introduced in April 2024.

4. Consultation and Engagement undertaken

The Principal Officers' of Staffordshire Fire and Rescue Service have consulted with the Staffordshire Commissioner, but no wider public or staff consultation has been carried out at this time.

Report Implications

5. Monitoring Officer comments:



Signature

Date

25/4/2023

6. Section 151 Officer comments:

No issues to raise regarding this decision notice.

Signature:  Date: 11 May 2023

	Yes	No
Has legal advice (outside of that provided by the Monitoring Officer) been sought on the content of this report?		X

7. Legal Comments:
n/a

8. Equality Comments – please attach the completed EIA

A People Impact Assessment is undertaken to support the CRMP process. We are required to have due regard to the Public Sector Equality Duty under section 149 of the Equality Act 2010 when taking decisions with regard to the need to:

- eliminate discrimination, harassment and victimisation and other prohibited conduct;
- advance equality of opportunity between people who share a relevant protected characteristic and persons who do not share it
- foster good relations between people who share a relevant protected characteristic and persons who do not share it

This process helps us to identify where we can have the potential to make a positive of impact by considering how risk and disadvantage can be linked to societal and human characteristic factors; and we are committed to undertaking equality analyses on parts of the CRMP that may impact on our own workforce and the communities of Staffordshire.

There have been some significant areas of work that have been undertaken and/or are being developed since the Safety Plan was launched which have sought to address any potential equality impacts arising in relation to the Public Sector Equality Duty including:

- our 'Our Culture' report (a report following a series of culture sessions from May to August 2021);
- the publication of our Statement of Intent;
- the development of a new Workforce Strategy;
- the appointment of a new Head of HR dedicated to Fire; and


- the creation of a new Positive Action Support Officer post working within the shared service Positive Action Team to help Staffordshire Fire & Rescue and Staffordshire Police become organisations that truly represent and reflect the diverse communities, which they serve.

In light of the work outlined above, we do not consider that there are likely to be significant or disproportionate equality implications arising from the extension of the current CRMP, but in accordance with the Recommendations section above we will carry out a People Impact Assessment around the proposal to extend to ensure there are no significant changes or areas of concern on which the Service would need to consult with its workforce or its communities.

9. Background/supporting paper

Please answer the following questions	Yes	No
10. Public access to information?	X	
11. Does this decision involve the processing of personal data? (If yes please attach a completed Data Impact Assessment)		X
12. Is the publication of this form to be deferred? (If yes approx. how long?)		X
13. Does this form contain commercial or operationally sensitive information which is to be redacted? (If yes, please provide details with the submission of this note)		X

14. ORIGINATING OFFICER DECLARATION:

Author	Nick Jones: Area Manager-Strategy & Intelligence
Signed	
Date	4 th May 2023



Equality Impact Assessment

The purpose of this EIA is to ensure you consider any equality issues as part of your decision making when developing / reviewing your policy / procedure.

Please complete the sections below and send to the Staffordshire Commissioner's Office to be quality assured. New / revised policies cannot be published on the policy database until the EIA has passed the quality assurance process.

Title of policy/procedure:	Community Risk Management Plan 1 year extension
Department:	Staffordshire Fire & Rescue
Date:	24 th May 2023

1. Identify the aims and purpose of the policy

The 1 year extension for the finalisation of the CRMP 2024 – 2028 is to allow time for the new Commissioner to take office and fully understand the planning process, plan contents and to ensure that the governance arrangements for the Commissioner's office, police and fire are more closely aligned.

2. Identify the individuals and organisations who are likely to have an interest in, or be affected by the policy.

The Communities of Staffordshire and Stoke-on-Trent
 The Police Fire and Crime Commissioner
 FRS Employees in delivery and monitoring of Plan

3. Data

Summarise the findings of any monitoring data / information which you have considered regarding the impact of this policy on people from all or any of the protected groups. This could include national or local data.

3.1 Age

We ensure that Data relating to Age is captured through our day to day data collection methods. In order to understand risk and engagement alongside access to services. This information will be reported on through our Prevent and Protect Directorate

We will continue to engage and consult with internal and external stakeholders to inform our work.

Where specific targeting based on age is required we will ensure that communities are fully informed of the rationale for this approach.

3.2 Disability

We ensure that Data relating to Disability is captured through our day to day data collection methods. In order to understand risk and engagement alongside access to services. This information will be reported on through our Prevent and Protect Directorate

We will continue to engage and consult with internal and external stakeholders to inform our work.

Where specific targeting based on Disability is required we will ensure that communities are fully informed of the rationale for this approach

3.3 Race

We ensure that Data relating to Race is captured through our day to day data collection methods. In order to understand risk and engagement alongside access to services. This information will be reported on through our Prevent and Protect Directorate

We will continue to engage and consult with internal and external stakeholders to inform our work.

Where specific targeting based on Race is required we will ensure that communities are fully informed of the rationale for this approach

3.4 Religion or Belief

We ensure that Data relating to Religion or Belief is captured through our day to day data collection methods. In order to understand risk and engagement alongside access to services. This information will be reported on through our Prevent and Protect Directorate

We will continue to engage and consult with internal and external stakeholders to inform our work.

Where specific targeting based on Religion or Belief is required we will ensure that communities are fully informed of the rationale for this approach

3.5 Sex

We ensure that Data relating to sex is captured through our day to day data collection methods. In order to understand risk and engagement alongside access to services. This information will be reported on through our Prevent and Protect Directorate

We will continue to engage and consult with internal and external stakeholders to inform our work.

Where specific targeting based on sex is required we will ensure that communities are fully informed of the rationale for this approach

3.6 Sexual Orientation

We ensure that Data relating to Sexual Orientation is captured through our day to day data collection methods. In order to understand risk and engagement alongside access to services. This information will be reported on through our Prevent and Protect Directorate

We will continue to engage and consult with internal and external stakeholders to inform our work.

Where specific targeting based on Sexual Orientation is required we will ensure that communities are fully informed of the rationale for this approach

3.7 Transgender

We currently find our data collection needs for the analysis of gender reassignment Data relating to gender identity is not fully in place, we are following the NFCC guidance on the collection of gender identity and our Prevent department is exploring methodology to capture this in our Service delivery data collection sets. . In order to understand risk and engagement alongside access to services. This information will be reported on through our Prevent and Protect Directorate

We will continue to engage and consult with internal and external stakeholders to inform our work.

Where specific targeting based on Sexual Orientation is required we will ensure that communities are fully informed of the rationale for this approach

4. Research

Summarise the findings of any research you have considered regarding this policy for all or any of the protected groups. This could include information you have obtained from other sources e.g. Home Office.

4.1 Age

NFCC and Home Office guidance
GHS
ONS
Age UK
NHS England

4.2 Disability

NFCC and Home Office guidance
GHS
ONS
NHS/MIND/ Neurodiversity Specialists

4.3 Race

NFCC and Home Office guidance
GHS
ONS

AFSA
4.4 Religion or Belief NFCC and Home Office guidance GHS ONS AFSA
4.5 Sex NFCC and Home Office guidance GHS ONS WFS
4.6 Sexual Orientation NFCC and Home Office guidance GHS ONS Local Pride Leaders
4.7 Transgender NFCC and Home Office guidance GHS ONS

5. Consultation Summarise the opinions of any consultation for all or any of the protected groups. Who was consulted and how e.g. survey, discussion, forum. If there was no consultation please justify why.
5.1 Age Please refer to Communications Department and Business Intelligence Unit for 2020
5.2 Disability Please refer to Communications Department and Business Intelligence Unit for 2020
5.3 Race <i>Please refer to Communications Department and Business Intelligence Unit for 2020</i>
5.4 Religion or Belief <i>Please refer to Communications Department and Business Intelligence Unit for 2020</i>
5.5 Sex Please refer to Communications Department and Business Intelligence Unit for 2020
5.6 Sexual Orientation

Please refer to Communications Department and Business Intelligence Unit for 2020

5.7 Transgender

Please refer to Communications Department and Business Intelligence Unit for 2020

6. Conclusions

Taking into account the results of the monitoring, research and consultation, set out how the policy impacts or could impact on people from the following protected groups? (Include positive and/or negative impacts)

6.1 Age

Focusing upon a particular age group as part of a campaign or initiative could result in a reduction in service for other community members.
There is a potential that initiatives targeted on certain age specific groups could leave the Service vulnerable to challenge of prejudice/stereotyping. Focus on age specific groups may create the feeling of alienation.
Be mindful when dealing with small private companies that do not employ over 50s. Age legislation is in place and where a small company has an unvarying workforce prolife it may not mean they are operating discriminately.
Building relationships with the young and the elderly need to be mindful of their differing communications preferences.

6.2 Disability

Focus upon a particular disability group as part of a campaign or initiative could result in a reduction in service for other community members.
There may be instances where people with particular disability will not be able to use our packages due to their target or message.
Private organisations buildings, and this may be the case in terms of the premise of partners, need to be advised that the Service is bound by the PSED and therefore should we need to visit their premise without full access we may need to make suitable arrangements for them to visit on our premise if necessary. The majority of Service premise are accessible nevertheless service uses and community member need to be aware of the accessibility in relation to the building and its access, egress and use of building needs to be advised and where applicable recorded and detailed.

6.3 Race

Potential for a delay in delivery of materials or service due to specific language requirements
Lack of local knowledge and understanding of our community could result in exclusion when carrying out particular community safety activity.
International dealings with an organisation that is in dispute with another possible partnership business or businesses that currently do not understand that possible employees with an immigrant background who speak English at home can perform at similar levels to employees without an immigrant background.
To progress community engagement with BME needs due regard considerations for the development of networks, volunteering, community advocates, and places of socialising and worship to enable more sustainable relationship building.

6.4 Religion or Belief

We ensure that Data relating to Religion or Belief is captured through our day to day data collection methods. In order to understand risk and engagement alongside access to services. This information will be reported on through our Prevent and Protect Directorate. This is a significant part of our business and commercial engagement as well as community engagement activity.

We will continue to engage and consult with our stakeholders to inform our work to build sustainable and meaningful regular engagement.

Where specific targeting based on Religion or Belief is required we will ensure that communities are fully informed of the rationale for this approach

6.5 Sex

A business/partner/community group that does not have a current Equality and Diversity policy and does not provide equal pay. This is at risk of challenge and should be assessed.

6.6 Sexual Orientation

Possible partnership with a family business that still follows its own traditional family values. The Service needs to be mindful of this when entering into partnerships. Members of the staff, visitors and members of the community who are going through transition need to be treated sensitively and have access to the appropriate gender facilities they are living as.

6.7 Transgender

We will ensure that data relating gender reassignment is captured through our day to day data collection methods. In order to understand risk and engagement alongside access to services. This information will be reported on through our Prevent and Protect Directorate

We will continue to engage and consult with internal and external stakeholders to inform our work.

Where specific targeting based on Gender Reassignment is required we will ensure that communities are fully informed of the rationale for this approach

7. Decisions

If the policy will have a negative impact on members of one or more of the protected groups, explain how the policy will change or why it is to continue in the same way.

If no changes are proposed, the policy needs to be objectively justified.

The Objectives of the Public Sector Equality Duty will continue be the overarching principles and objectives for the Service. Objectives that remain under development, and completed objectives within the current plan such as the significant levels of Transformation work and Reviews all have a specific People Impact Assessments (PIA) for the demonstration of Due Regards to the Public Sector Equality Duty as is required by Law. These PIAs may have mitigation action requirements to be undertaken by an identified departmental planning team.

The 'Level of Assurance' documentation provides the evidence against that the current Safety Plan is achieving its agreed objectives and this will continue until such times that the New 2024- 2028 CRMP is finalised before December 31st 2024.

Over the past 3 years of the current Safety Plan there has been significant challenges that the Service has adapted to, whilst remaining cognisant of the Community Safety Plan. These have been recommendations from the Grenfell Inquiry, Covid-19 implications, environmental impacts, the cost of living crisis and reports concerning some systemic and behavioural difficulties across the Fire and Rescue sector. All of these have had disproportionate impacts for those most vulnerable in society some of whom have a contributing protected characteristic as stipulated in the Equality Act 2010.

As the Service is developing its New Community Risk Management Plan it will need to stay consistent and constant with the delivery objectives of the Community Safety Plan. This is absolutely required explicitly if the planning timeline is to be extended in order to protect objectivity, confidence and delivery without losing momentum.

It is unlikely that the extension will result in a negative impact in so far as the current Community Safety Plan continues to be demonstrating due regard in its mechanisms to deliver the agreed objectives and act on any mitigations that have been identified.

8. Monitoring arrangements

If the policy is new what consideration has been given to piloting the policy?

If monitoring is not already in place what arrangements have been made to monitor the effects of the policy on equality and diversity?

Annual Statement of Assurance,
Service Delivery Boards,
Service Management Boards,
Service Governance Boards.

Eliminating any unlawful discrimination

Our Targeted Work

SFRS targets its collective capabilities and resources effectively to better protect those most at risk from fire, and takes an holistic approach to our work, looking at wider issues away from fire, for example, social isolation, warmer homes etc. that are all included within Home Fire safety Visits carried out by the Service formally known as safe and well checks. SFRS actively targets groups that are at higher risk such as those who are over 65 years old, living alone, have mental health issues, lower on socio-economic scale and those with hearing and vision difficulties. These people are potentially more at risk of fire due to the very nature of their characteristics, which are protected under the Equality Act 2010. Using "Exeter" and "Mosaic" data we can understand how they correlate with risk and we produce risk profiles identifying areas of concern. The Home fire safety visit process and the guidance from NFCC person centred approach promotes the elimination of unlawful discrimination as it applies consistency across the County as it allows us to positively target and prioritise specific risks of individuals due to their protected characteristics. It promotes a consistent approach by embracing national guidance provided by the Fire Sector Federation, National Fire Chiefs Council (NFCC), British Automatic Fire Sprinkler Association (BAFSA), the Insurance Industry and UK and European Fire Sprinkler Networks.

Work specific to Domestic properties and their occupiers

SFRS works with the communities of Staffordshire and Stoke on Trent, to actively safeguard people and property from fire, as well as enhancing their wellbeing. We complete this work by training our staff in prevent work and understanding how inequalities contribute to risk in domestic settings. The awareness packages include Home fire safety visit training, olive branch training, recognition of unconscious bias. This contributes to the delivery of a range of initiatives, campaigns, education and home visits, etc. For the majority, the individuals that we engage with are identified by factors that increase their risk of death or injury, based upon our statistical evidence and demand. This allows us to target and prioritise the inequalities that result in an increased risk such as over 65's, mental health issues, hearing impairments, etc, which are protected under the Equality Act 2010 – our Home safety visits formally Safe and Well visits are an example of this.

Work Within The Wider Community

The continuous review and consultation with staff, partners, community groups and customers allows monitoring of performance across all information, data gathering and analysis giving due regard to protected characteristics. The process of analysis is designed to identify the most vulnerable groups in our community and to focus service delivery to best meet the needs of the communities. We will then tailor our services by understanding the risk profile of individuals, groups and communities.

Learning we gather

As a Service, we are required to adapt and meet constantly evolving and emerging risks across the communities and so therefore we seek to learn from all areas of our work,

including Prevention and Protection. We seek to eliminate any unlawful discrimination by analysing incident, safe and well and Fire Safety datasets on a person level basis. This has proved hugely beneficial in the development of our Risk Profiles identifying person, property and building risks, which has been integrated in to our contact Centre and our Home Fire safety visit approach.

In addition to this, following every fire fatality we hold a case conference meeting to explore individual factors, which led to the unfortunate outcome. This in turn, feeds into our policy and procedural development processes.

Advancing equality of opportunity

Our Targeted Work

SFRS ensure that all those who use the services provided by SFRS, or whom we contact through any aspect of service delivery, are given the protection that they require based on an understanding of need and risk. Our fire safety teams across the county base their inspection programmes on risk, for example premises with sleeping accommodation, which pose a greater risk to life should a fire occur. Recognition of those most at risk from fire in our communities will enable them to be assessed and dealt with effectively. Our CYP projects and Princes Trust activity effectively target those who may be at risk of becoming socially isolated and disillusioned with social ethics.

Work specific to Domestic properties and their occupiers

When we have recognised an additional need of an individual, we will endeavour to go above and beyond where possible, to provide the correct solution, to aid their requirements. An example of this is the specialist equipment in addition to standard smoke alarms that we issue, such as specialist hard of hearing equipment, heat alarms, CO alarms, etc. The Home Safety Visit and person centred concept is designed to ensure that an interaction carried out by SFRS maximises its potential to ensure the Health and Wellbeing of individuals in our communities.

Work Within The Wider Community

This priority is about developing the systems of collating and interpreting information to enable us to get a clearer understanding of the vulnerabilities and needs of our communities. An example of this is working with our colleagues to provide measures and information. It will also enable us to target the most vulnerable individuals and communities opening up access for our service users who would not usually engage with our activities. An example of this would be sharing information and data with colleagues in social care and health to identify individuals that would benefit from Assistive Technology due to their personal situation/vulnerabilities and all associated inequality contributing factors.

The Learning We Gather

We seek to advance equality of opportunity with partners and community groups, through our olive branch training work, our risk based inspection programme, as required by section 7.2d of the Fire Services Act 2004, and our learning which feeds into our data risk stratification.

Furthermore, we have worked in partnership with a variety of agencies and representatives from across the community, such as AGE UK, PHE and the Health & Wellbeing board, in order to develop a community fire safety training framework that will

equip our staff to engage and interact effectively with people according to their needs in relation to any activity or intervention.

Fostering good relations between different groups

Our Targeted Work

Using the Local Authority Planning Portal Fire Safety Officers in the Service Delivery Groups are able to identify any new housing developments within Stoke on Trent and Staffordshire. SFRS send out the pre-planning letter to the Local Authority Building Control (LABC) or the Approved Inspector (AI). This allows the earliest possible intervention where changes to plans may need to be applied to premises to comply with fire safety legislation, reducing the regulatory burden on the end user.

SFRS also partake in the Primary Authority Scheme. This allows us to work on a national level with BUPA, Bromford Group, Horizon Care, Life ways (care Provider) and Busy Bees Nurseries, again reducing the regulatory burden, in line with the regulators code, by giving those companies a single point of contact for fire safety advice and guidance.

SFRS will aim to target those partners identified as being in a position to add positive support to the campaign through a greater understanding and awareness of the use of sprinklers. Primary targets for such engagement will include: Members of Parliament; planners; Local Authority Councils; Stoke City Council; Staffordshire County Council; District and Borough Councils; building groups; and construction firms. Using the toolkit made available by the NFCC to provide assistance and guidance for engagement. We will also have specific relationships with NGOs acting on behalf of disability, age (the young and the old as appropriate) religious groups, economically disadvantaged, refugees and asylum seekers and race equality advocacy.

Work specific to Domestic properties and their occupiers

We are continuously working with partner agencies to provide the correct level of service to our communities, by sharing of information and best practice. We maximise opportunities for engagement, by utilising our community fire stations and their facilities. Our prevent teams work closely with their local councils and attend locality meetings, in order to share case information and work together, in order to find an effective outcome for the client. We will have Service Level Agreements in place with our partner agencies, to provide a structured approach around our processes, allowing for effective work practices, these will cover all our partners who we refer into or vice versa, organisations such as Staffordshire Cares

We also advocate pro-active action at local level providing an intelligence lead risk based approach to all areas of our prevention and protection work. This is identified through data stratification and the use of our Risk profiles which has identified areas of the community more at risk of a fire death such as the elderly living alone.

Work Within The Wider Community

The process of information and data led Prevention and Protection work looks to build on the good relationships and identify new and beneficial partner and community groups to ensure we deliver a customer focused and needs based service. We recognise that the most knowledgeable, experienced and/or 'current' partners are not necessarily the most traditional, well-known or best resourced organisations. Clear and meaningful information is gathered and shared across the County and City to enable customer focused

interventions to be delivered at the correct time and place using a partnership approach. An example of this would be the fatal fire reviews where partners, staff and family members meet to discuss, share and act upon information/intelligence that has been gained from the incident, to inform future work and limit/prevent re-occurrence.

The Learning We Gather

We seek to foster good working relationships from our ongoing learning gained via Post Incident Questionnaires (PIQ), which are completed by service staff and volunteers following an Accidental Dwelling Fire. The PIQs, as well as seeking data and intelligence on causal factor, provide the opportunity for a follow-up engagement between the Service and the individual(s) whereby they can gain further information and support as required.

Our ongoing commitment to olive branch training and case conferences support the ongoing learning linked to person based risks and are always arrived out in an inclusive manner, with partner and community group involvement.

This equality impact assessment will be published on the SC website.

EIA Form Dated
01/08/2018

