

Gloucestershire County Council's  
**Response to Gloucestershire  
PCC's Submitted Business Case**



Gloucestershire  
**Fire and Rescue Service**  
Working together for a safer Gloucestershire



**Gloucestershire**  
COUNTY COUNCIL

# Executive Summary

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Gloucestershire County Council, along with most other key partner agencies and local MPs, categorically urges the Home Secretary to reject the proposed governance takeover of Gloucestershire Fire and Rescue Service by Gloucestershire's Police and Crime Commissioner.

## Economy

- The financial arguments put forward do not stack up and the proposed transfer would create an unnecessary additional cost to Gloucestershire taxpayers

## Efficiency

- The transfer of governance to a less transparent and accessible Police and Crime Commissioner would weaken democratic accountability

## Effectiveness

- The sector-leading Health and Social Care integration achieved by Gloucestershire Fire and Rescue Service through its integration with Gloucestershire County Council protective teams would be disastrously impacted by a transfer of governance
- Effective collaboration between blue light services, which the county council wholeheartedly supports, does not require any transfer of governance
- Highly desirable collaboration on property and assets for the benefit of the taxpayer, as spearheaded by the county council and partners through the One Public Estate programme, also does not require any costly transfer of governance

## In addition, this document sets out:

- Fundamental flaws in the way the PCC conducted his consultation on this proposal during 2018 and analysed those results
- The range of key partners and stakeholders opposing this proposal, including five of the county's MPs



# Dear Home Secretary

**Gloucestershire's Police and Crime Commissioner (PCC) has written to you seeking permission to take over responsibility for Gloucestershire Fire and Rescue (GFRS) from Gloucestershire County Council (GCC). In this response, I set out why this is a terrible idea, that will cost taxpayers significant sums, give no increase in public safety, and jeopardise existing best practice collaboration. Much of this is set out in the PCC's own independent report, funded by your department, which he has chosen to overlook.**

GFRS has been run successfully by GCC for more than 40 years. In that time, investment in the service has ensured it is a modern service, meeting the needs of the county's residents. That investment has ensured our firefighters have the most up-to-date equipment, training and facilities to enable them to work safely and meet the challenges they face operationally.

GFRS delivers well today in terms of value for money, where independent analysis by CIPFA shows the second lowest spend per head of population, thanks to joint working and cross-subsidy with the county council. GFRS uses that funding effectively – cutting primary and dwelling fires by more than the national average in the last decade – and cutting casualties in dwelling fires by a third more than the national average in the last eight years.

The PCC's proposals put that success at risk. They do not stack up in a number of key areas:

- The proposals will not save money, and in fact could cost taxpayers as much as £15.7million. That money will have to be found from tax increases or cuts to vital services
- There are no identified improvements in public safety
- Cutting senior firefighters would risk public safety
- Under the proposal, future decisions about GFRS would be taken in private, with no public scrutiny
- The proposals would jeopardise GFRS' partnership with GCC and the NHS, which currently helps protect some of the most vulnerable people in Gloucestershire

The PCC complains of "intense political resistance to change". He is correct. County and district councillors from every party, and five of Gloucestershire's MPs, intensely resist this proposal, because it is expensive, wasteful and offers no benefit, risks the safety of local residents and the effectiveness of a good fire and rescue service. It is our job, on behalf of local residents, to resist it.

The PCC complains of "a deliberate policy by the county council to discredit the advantages reform offers, based on self-interest." Speaking for myself, I do have a deliberate policy, of speaking publicly about my concerns and of highlighting the serious flaws the PCC's own research demonstrates with his proposal. The PCC's choice of words in his letter points to some of the challenges emergency services collaboration faces in Gloucestershire. I will not engage in a personal dispute. The county council stands ready to continue with co-operation with both Gloucestershire Police and the PCC, once this issue is resolved. Gloucestershire and GFRS do not need a change of governance. We need to stop unnecessary and costly internal wrangling between publicly funded agencies and get on with providing what our residents need.

**As part of GCC, working with our partners, our fire and rescue service will deliver assistance and protection for all our communities. We urge you to promptly reject this proposal and let us get on with doing that job.**



A handwritten signature in black ink that reads "Dave Norman".

**Councillor Dave Norman MBE**  
Cabinet Member for Public  
Protection, Parking and Libraries

# 1. Flawed finances

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**The financial business case put forward by the PCC is flawed. A transfer of governance would cost Gloucestershire taxpayers more.**

The PCC's business case claims the change of governance would provide around £4m in savings over a ten-year period. This is an inaccurate and deeply flawed analysis for the following reasons:

## 1. Procurement savings

The PCC case estimates procurement savings of c. £1m over 10 years. This assumes that having access to joint procurement arrangements with three other police forces would generate 3% savings on GFRS' total non-pay costs. However, GCC already provides similar and larger procurement arrangements with gross annual spend of c. £600m, compared to the Constabulary's £100m. Indeed, GFRS already benefits from participation in a South West procurement portal for goods and services.

## 2. Cutting senior fire officers

The PCC estimates a £0.9m saving from cutting the number of senior fire officers from three to two. This saving would endanger operational effectiveness and is not deliverable. Today, GFRS's Chief, Deputy and Assistant Chief Fire Officer ensure the service can deliver 24-hour senior leadership cover. In order to help pay for this protection, the county council cross-subsidises GFRS leadership roles, with senior firefighters taking management of wider GCC functions – such as the Civil Protection Team and Trading Standards. The PCC's proposals could only be delivered by removing the 24-hour contingency, which would be a particular issue during long running emergencies such as Gloucestershire's 2007 floods, and by assuming all of GCC's existing cross-subsidy would pass to GFRS. Senior fire officers question whether, the management changes are deliverable, given the scale of other changes.

This is at the same time as the PCC is advertising to increase his own costs by recruiting an additional Assistant Chief Constable, an additional senior police officer to bolster his current team of three officers, clearly recognising the importance of and demand on these roles.

In addition, the PCC estimates the cost of a Chief Finance Officer under its proposed organisational structure at c.£20k pa., based on the assumption that the existing Chief Finance Officer would increase their hours. This does not seem a viable or sensible assumption.

## 3. Vehicle Workshops

The PCC estimates a £0.7m p.a. saving from unspecified efficiencies generated as a result of closer working between GFRS and GC workshops. This is, in fact, a collaboration project which GCC has been happy to explore with the PCC for a number of years - but has been delayed, at the request of Gloucestershire Police, following significant staffing issues in their garage operation. If the PCC were to resolve the outstanding issues within his existing responsibility, this could be progressed now. Governance change is not necessary.

In the interim, in contrast, the GFRS garage has taken on the management of the entire GCC operational fleet, providing the taxpayer with a significant saving. This saving could be jeopardised under the PCC's proposals.

## 4. Missing additional costs

Even though much of the work of GFRS is cross-subsidised by GCC, the PCC's case makes no assessment of the cost his proposals would have to the taxpayer in general (e.g. the requirement to recruit additional managers to cover civil protection, trading standards and coronial services, loss of efficiencies, cost to social care etc). In many cases, he assumes that all of the budget for GFRS will transfer to him, but that all of the cost remains with GCC. Independent assessments put the cost of these proposals to GCC at £500k p.a. The PCC's proposals acknowledges these costs, however it merely states it "... assumes the cost of replacement would be capable of being absorbed [by GCC] overall".

The PCC's case only appears to be positive by counting benefits that accrue to Gloucestershire Constabulary, whilst ignoring the costs that it would cause GCC. This is perverse and disingenuous.

There is currently an internal GCC allocation of support service costs of £2.5m to GFRS. This is an allocation of central costs and does not reflect the true cost of services provided to GFRS. If a new organisation provides some or all of these support services, then it is unlikely that savings of £2.5m would result to GCC, thus resulting in greater overall cost to Gloucestershire taxpayers.

In addition, the PCC's case makes no estimate of the financial cost/risk resulting from novation of PFI and other contracts potentially resulting from a transfer of governance. This could likely be used by contractors as an opportunity to claim contract variation. The PCC's business case also contains no estimate of the impact of the transfer on pensions costs.

***The financial business case put forward by the PCC is flawed. A transfer of governance would cost Gloucestershire taxpayers more.***



## 5. Capital budget

The business case proposes a new £1.8m capital budget for the fire and rescue service. At present, capital funding for GFRS is provided by GCC on an ad-hoc basis. Because of GCC's much larger capital budget, this allows for significant contingency, removing the need for an ongoing "sinking fund" to pay for new capital projects. GCC currently funds much of its capital programme through development of other assets. The PCC's proposal, in separating GFRS from GCC, explicitly requires an annual £1.8m capital contribution from taxpayers – whether it is needed or not in that year. This revenue would have to be either provided from the government or raised locally via increased taxation. The PCC's financial net positive value analysis does not include this extra cost.

## 6. Debt finance

The business case requires 5.7% of GCC's funding and reserves to be transferred to the control of the PCC to pay for the fire and rescue service. However, the proposal does not propose transferring 5.7% of the county council's outstanding debts – which would amount to £16.4m – instead proposing an approach based on the value of non-PFI assets transferred, which is hard to justify.

## 7. Resilience

A key reason why there would be no savings to the taxpayer from a change of governance is because of the loss of the benefits of scale GFRS currently enjoys from being embedded within a large county council. The precept level that would have to be set by the PCC is unknown, but would almost certainly be higher for a stand-alone organisation than for the cost of GFRS within GCC. That gap would have to be funded through a precept on Gloucestershire taxpayers. The PCC has been clear throughout the consultation process that there can be no mixing of fire and police budgets and, in his words "the fire service will have to live within its budget". At present, as an integral part

of GCC, GFRS benefits from access to the council's whole reserves if needed, and the revenue budget can be flexed to support demand. The PCC argues that the ability to do so deprives GFRS of "certainty". However, this confuses certainty as to spending, with certainty as to budget. At present, GCC's greater budget backs GFRS in the event of an emergency, providing certainty that funds will always be available if they are really needed. In contrast, with a small, fixed budget, the PCC's proposed approach would leave GFRS vulnerable in the face of unexpected expenditure.

## 8. Cost of transition

This would be lengthy, expensive, require legal expertise and ultimately cost the taxpayers for arguably no benefit and increased risk. In addition, the timing is problematic as changes are unlikely to be achievable in time for the next round of PCC elections in 2020, so risk being overturned and waste further public money.

Whilst there are savings to the taxpayer that can be delivered through collaborative and partnership working, none of these would require a change of governance, merely a willingness to cooperate. Indeed, the PCC's own Home Office-funded independent report commissioned in 2017 clearly identified "no short-term savings to be made in sharing support services between police and fire".

Some of the potential benefits that could be achieved for the public would arise from sharing of community buildings between police and fire, allowing any capital gains to be put to the public good. Yet the PCC proposes to spend this windfall to cover the transitional costs of changing governance, rather than for the benefit of the people of Gloucestershire.

## 9. Net positive value

The PCC's financial argument are summarised in the Net Positive Value (NPV) section of the business case. This includes all of the benefits accruing to GFRS/GC from the change, but exclude any of the costs which the proposals would leave to GCC. This omission, sufficiently serious as to be potentially irrational, renders the conclusions unsound. Including GCC's independently assessed £0.5m pa costs means the NPV assessment overlooks £5m of cost to local taxpayers.

The NPV for the PCC's preferred model is underwritten by four areas of savings. None are realistic:

**Joint Estates Strategy** - This is assessed in detail in Section 5, but these benefits are entirely deliverable under any governance model.

**Chief Officer Costs** - This assumes all current GCC cross-subsidy transfers to the PCC, as well as reducing GFRS resilience.

**Fleet Management Savings** - These benefits are entirely deliverable under any governance model.

**Purchasing economies of scale** - The business case irrationally assumes that procurement savings will be delivered in forcing GFRS to jointly procure with a smaller partner than it does today.

Even using this flawed approach, the proposed change delivers a very low level of savings. In addition, the following costs, identified elsewhere in the PCC's proposals are missing from the NPV calculation:

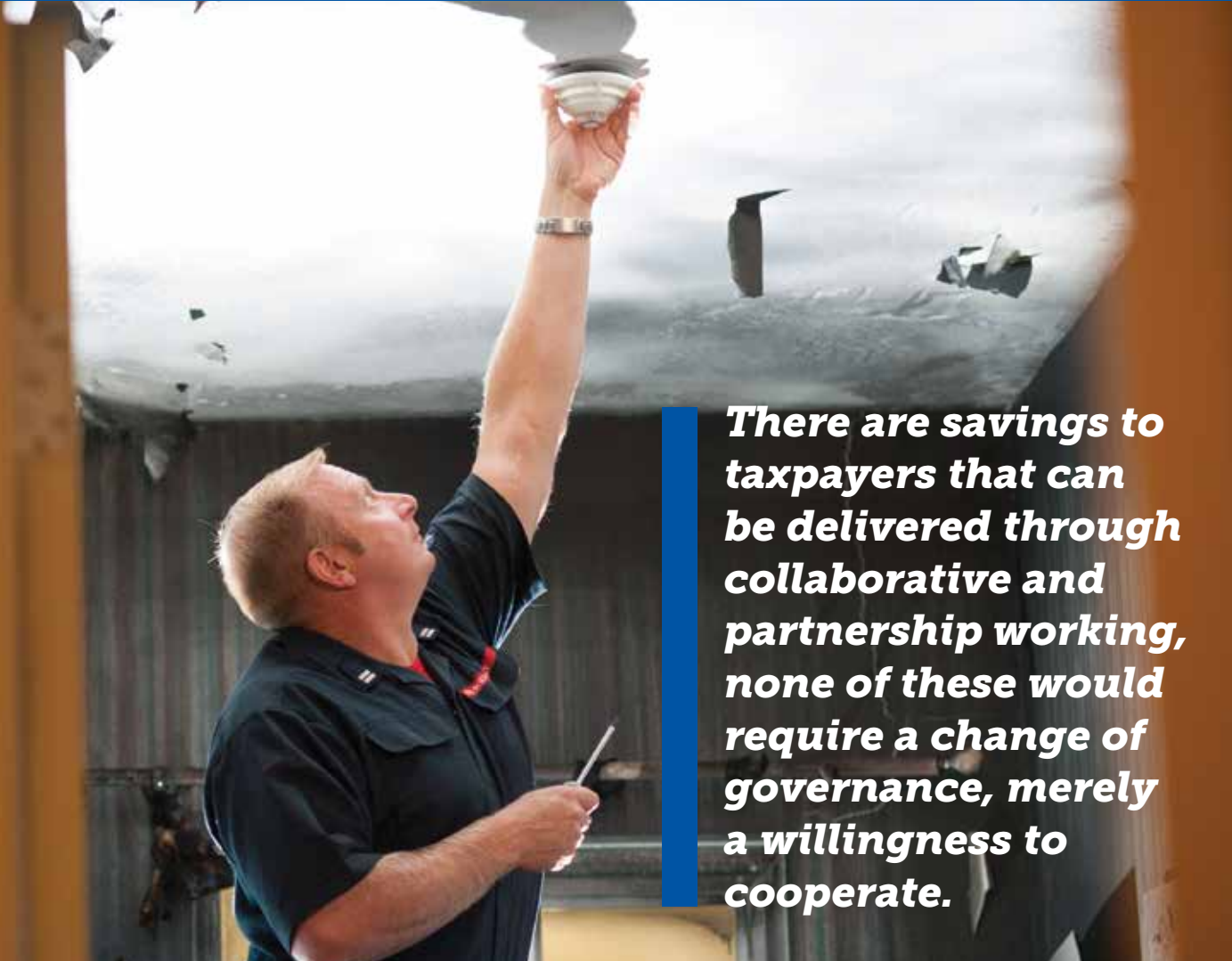
**Capital financing costs** - £1.8m pa

**New training facility** - cost unspecified, but Cheshire's planned fire training facility is expected to cost £9m

**PFI contracts** - no allowance for risks in these contracts

Taking these together, the NPV ought to show a cost to taxpayers, over ten years of between £6.7m<sup>1</sup> and £15.7m<sup>2</sup> of the PCC's suggested approach.

<sup>1</sup> Removing Estates, Fleet Management and economies of scale, including capital costs  
<sup>2</sup> As above, but including new training facility costs.



***There are savings to taxpayers that can be delivered through collaborative and partnership working, none of these would require a change of governance, merely a willingness to cooperate.***

## 2. Less accountable to the public

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### **The PCC's proposal would reduce the public accountability of Gloucestershire Fire and Rescue Service to local people.**

The case for change put forward claims improved governance and scrutiny as a key benefit. However, today, all county council decision-making on the fire and rescue service, as in other areas, takes place in public, with significant opportunities for questioning by the public and opposition councillors. Under the proposals, there would be no opportunity for formal public questions and the opportunity for scrutiny by opposition councillors would be dramatically reduced.

### **How are decisions about the fire and rescue service made today?**

As part of Gloucestershire County Council, all major decisions about Gloucestershire Fire and Rescue Service are taken in public, with the opportunity for public and councillor questions to be asked and for elected representatives from all parties to take part. All meetings are fully minuted, with the minutes publicly available. Any five councillors can call-in any decision, pausing its implementation until it can be referred to a scrutiny committee for examination in public. With over half of county councillors also serving on district councils, current governance arrangements also help ensure decisions take into account the perspective of individual local communities.

### **How would decisions be made under the PCC?**

Under the proposed change, decisions about the fire and rescue service would be made by the PCC in private. There would be no opportunity for public or councillor questions, nor any ability for decisions to be called-in or challenged. Police and Crime Panel meetings would be the only opportunity for formal public scrutiny of issues relating to GFRS.

The proposal would see a 79% reduction in public meetings that can look at Gloucestershire Fire and Rescue Service and a 100% reduction in the opportunity for the public to formally raise questions on related issues.

### **Parish and Town Councils**

County councillors are the eyes and ears of their local communities, regularly attending parish and town council meetings across the county, allowing any local concerns about GFRS to be quickly highlighted. In contrast, the PCC does not regularly attend parish and town council meetings.



FIRE

## Current Fire Governance

Structure	Meetings per year	Open to public?	Public questions?	How is meeting recorded?	How constituted?	Cross party?
Adult Social Care and Communities Committee	6	Yes	No	Full minutes	Elected	Yes
Corporate Overview and Scrutiny Committee	c.6	Yes	No	Full minutes	Elected	Yes
Cabinet	6	Yes	Yes – on agenda	Full minutes	Elected	No, except questions
Full Council	6	Yes	Yes	Webcast	Elected	Yes

## PCC Governance

Structure	Meetings per year	Open to public?	Public questions?	How is meeting recorded?	How constituted?	Cross party?
Joint Independent Audit Committee	4	No	No	Agenda and key decisions- last published 2015	Appointed	No
Accountability and Performance Meeting	12	No	No	Unknown	By PCC	No
Governance Board	12	No	No	Unknown	By PCC	No
Finance Panel	12	No	No	Unknown	By PCC	No
Holding to account meeting	52	No	No	“Themes” published	PCC and Chief Constable	No
Police and Crime Panel	5	Yes	No	Full minutes	Elected	Yes

**All county council decision-making on the fire and rescue service, as in other areas, takes place in public, with significant opportunities for questioning by the public and opposition councillors.**



***A new Chief Fire Officer has been appointed and is working closely with auditors and other colleagues to ensure the highest standards of governance, oversight, scrutiny, compliance and leadership are in place.***



The PCC's business case makes much of the alleged misdemeanours of the former Chief Fire Officer. Without commenting on the ongoing criminal investigation, that case in fact shows GCC's policies working as they should. GCC's whistleblowing policy allowed the issue to be promptly reported, to be immediately referred to the police and to GCC's internal audit service, and for a full, transparent investigation of the issues to be carried out, with full scrutiny from opposition councillors and the media.

A new Chief Fire Officer has been appointed and is working closely with auditors and other colleagues to ensure the highest standards of governance, oversight, scrutiny, compliance and leadership are in place.

The PCC's case suggests that GFRS performance data is not easily accessible. This is not the case and fails to recognise that anyone can compare GFRS performance against all fire and rescue services' on LG Inform as well as through Home Office National Statistics. This gives members of the public access to published data about their local fire and rescue service and the performance of the council or fire and rescue authority can be compared to the performance of all other authorities.

The PCC's business case also makes no mention of the positive feedback that Gloucestershire County Council received from its independent LGA Peer Review June 2018, which reported among other findings that:

- The county council has a strong team of political and officer leaders which is now being used to work with partners, establishing ambitious plans for the future
- The council understands the needs and priorities of its communities
- The council has a good track record of managing its finances
- The council is clearly a community leader

Lastly, it should be noted that HMICFRS oversight and investigation of fire and rescue services continues wherever governance sits, so there would be no increase in accountability in this respect, from a change of governance.

### 3. Risk to health and social care integration

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**Gloucestershire County Council's integration of its fire and rescue service and adult social care prevention agenda is nationally class-leading and arises solely because the fire and rescue service is embedded within the county council. It would be negatively affected if Gloucestershire Fire and Rescue Services' governance was transferred to the PCC.**

GFRS holds a statutory duty to prevent fires and other emergencies. For 20 years early intervention approaches have been adopted by fire and rescue services, including Gloucestershire. These early intervention services have evolved significantly during these 20 years with the broadest successes being realised in services with either greater resources (people and financial) or where they are closely integrated as part of the same organisation e.g. where the fire and rescue service is part of the county council and sits alongside Social Care and Public Health etc. This success comes from effective relationships with colleagues across the council, working towards a shared vision and agreed objectives.

Gloucestershire communities, particularly the most vulnerable, have witnessed this integration first hand and have been in receipt of some of the most effective and visionary prevention activity. The benefits to the community are significant, as are the efficiency savings (social return on investment) to the public purse across Gloucestershire.

As demand for the emergency response of GFRS has reduced (over 40% reduction in emergencies across England in past 10 years), although the risks protected by GFRS have remained constant, GFRS staff have been able to allocate additional valuable time to prevention activity. The integration appetite and capacity pressures faced by the broader public sector have created opportunities to utilise the unique and trusted position held by firefighters in the community.

In fact, the current governance delivers not only prevention, but benefits collaboration on wider community safety, vulnerability and independence. Examples of this progressive activity include:

- GP surgeries and hospitals: as part of the safety agenda for the most vulnerable, safe and well visits are integral and GFRS works with hospitals and GP surgeries in various ways to enhance the safety of the most vulnerable

- Community Hospitals and Adult Social Care: working closely with community hospitals and adult social care to provide the advices and support to the most vulnerable and allowing them to feel safe on leaving primary care
- Mental Health Services: as part of the Mental Health Crisis Care Concordat, GFRS works closely with other agencies to provide training and advice to those working with the most vulnerable in relation to dementia or mental health issues. These agencies include Gloucestershire Clinical Commissioning Group, Gloucestershire Care Services NHS Trust, Gloucestershire Hospitals NHS Foundation Trust, 2gether NHS Foundation Trust, NHS England, South Western Ambulance Service NHS Foundation Trust, Gloucestershire Constabulary, Gloucestershire Police and Crime Commissioner, the Samaritans, Healthwatch Gloucestershire, Turning Point, County Community Projects, Rethink, Carers Gloucestershire and the Independence Trust
- Out-of-Hours GPs and paramedic teams: GFRS works closely with the ambulance service to provide co responding and support for nurses and to help reduce pressures on partner agencies. GFRS incorporate the following into their Safe and Well visits:
  - Falls assessments
  - Other agency assessment e.g. Telecare, hearing impaired equipment
  - Equipment supply and fitting at point of visit (specialist equipment)
- Telecare Responder Service: the Telecare initiative provides significant social return on investment with care home placements, ambulance, emergency admissions and hospital stays, police, local authorities and fire and rescue service call outs avoided or reduced. In 2017/18 GFRS attended 1,312 Telecare calls

Examples of the notable practice carried out through the integration of services in Gloucestershire can be found at Appendix 2.

***GCC remains absolutely committed to exploring opportunities to reduce the public estate and share buildings and facilities throughout the county with the police.***



## 4. No benefit to blue-light collaboration

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**The Police and Crime Act places a duty on blue light services to collaborate where efficiency and effectiveness can be improved. This is deliverable independently of where governance sits, and no change is required to deliver this.**

Collaboration has been a focus for both GCC and GFRS for several years. GCC operates as a 'commissioning council', working across a variety of functions and organisations to deliver effective services to the communities of Gloucestershire. GFRS is an integral part of the South West Emergency Services Collaboration Group and the Gloucestershire Emergency Service Collaboration Board (GESCB). Both the council's Lead Cabinet Member and senior officers are represented.

There is a significant amount of innovative collaboration taking place both between blue light services and wider public sector agencies including:


- Joint strategic working through the Safer Gloucestershire Partnership
- Integration of GFRS and GCC fleet management and servicing
- Joint training on both operational and leadership development between GFRS and Gloucestershire Police
- Joint exercising and blue light training through the Local Resilience Forum (LRF)
- Sharing of incident ground welfare facilities
- Road Safety education
- Emergency medical response services with SWAST (South West Ambulance Service Trust)
- Joint fire investigations involving death, serious injury and significant financial loss
- National Inter-agency Liaison Officer training
- Missing persons search response with Gloucestershire Police

Through the GESCB, there is a significant programme of work to explore and develop opportunities across a range of collaboration areas. Whilst some opportunities are more difficult to achieve than others, the established governance arrangements indicate a clear commitment to collaborate and engage in positive dialogue to make progress which will benefit the communities of Gloucestershire.

Importantly, the scale of collaboration achieved to date should not be overlooked and considering the age of some key collaboration successes should be considered as pioneering. This level and success of collaboration clearly indicates that the PCC's governance case has little or nothing to do with the ambition or ability to collaborate.

Gloucestershire County Council wants to continue with this partnership and look for additional opportunities for collaboration, in the same way that it has actively delivered partnership working with e.g. GFirst LEP (acting as the accountable body for the Local Enterprise Partnership), CCG (jointly funding co-commissioning posts) and Gloucester City Council (where it co-funds an innovative joint Managing Director/Commissioning Director post as well as a range of shared back office services). GFRS already works with Gloucestershire Constabulary to develop better ways of working and logistical support. GCC also works closely with Home Office and Crown Commercial Services. Wider work into logistic support functions is due to start as part of current collaboration and efficiency work being completed by both Gloucestershire Constabulary and GFRS and will be completed independent of any governance change.

The county council would also strongly wish to re-form the county's Road Safety Partnership, broken up at the PCC's behest a couple of years ago.

A firefighter in a blue uniform with reflective stripes and a badge is focused on working on the engine of a vehicle. He is wearing blue gloves and using a large wrench. The background shows the interior of a fire engine with various mechanical parts and hoses.

***Our analysis indicates that there is not a case for change on performance or public safety grounds for fire and rescue***

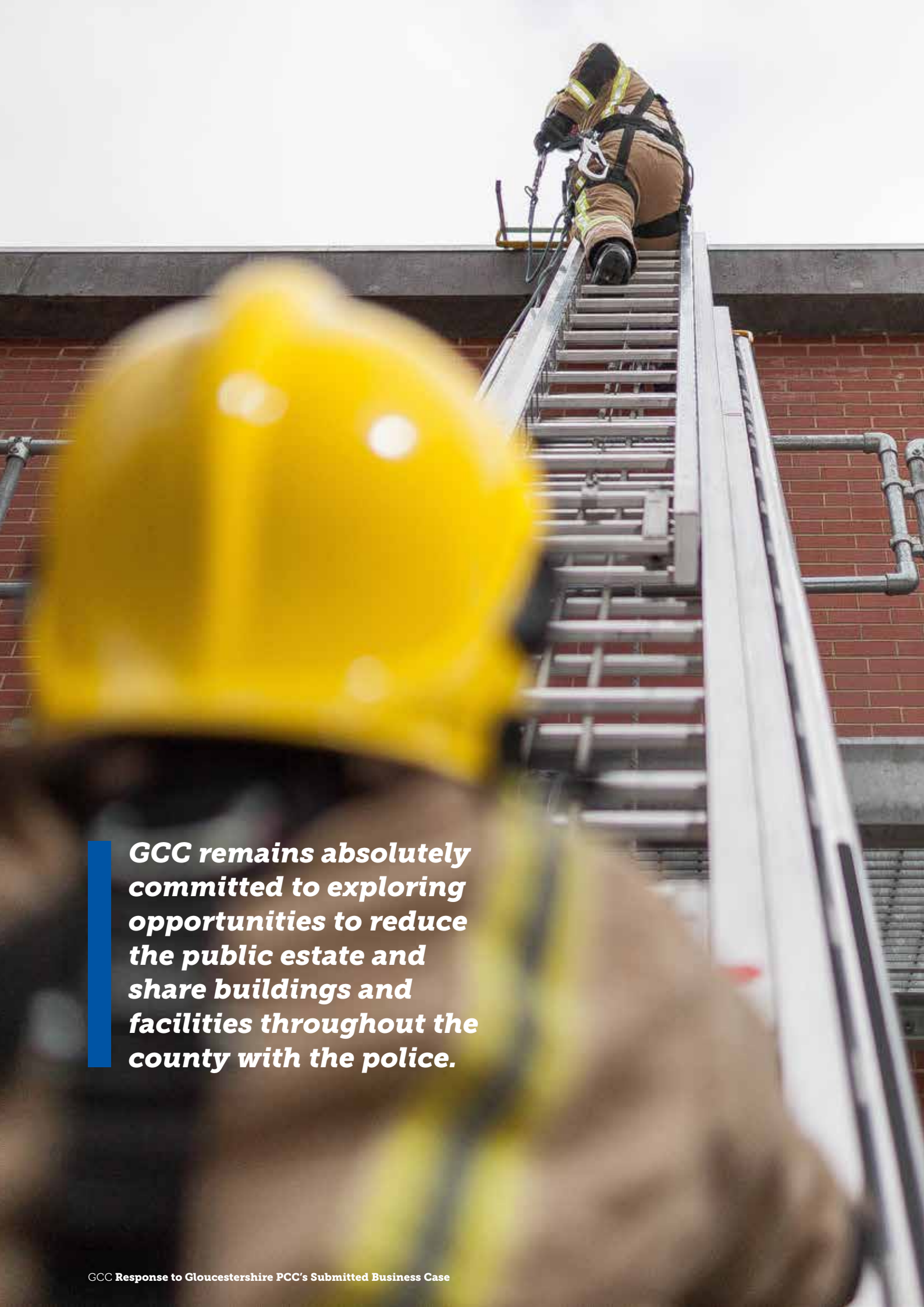
Home Office-funded, independent report commissioned by the PCC in 2017

## **Wider protective collaboration**

Collaboration goes beyond the duty within the Police and Crime Act. As part of GCC, GFRS has responsibility for the oversight and delivery of the Civil Protection Team (CPT) and the Trading Standards Service. The CPT, as a category 1 responder and key member of the Local Resilience Forum, works effectively in partnership with GFRS to bring greater resources and skills to bear in order to protect the communities of Gloucestershire.

In terms of regulatory protection, bringing together the fire protection and trading standards functions ensures end to end support and protection to businesses, consumers and industry across Gloucestershire. The ongoing delivery of these partnerships by GFRS is not referenced in the business case, nor is the alternative arrangements which would be required or the disadvantages arising from creating distance between or disconnecting them.

The initial, Home Office-funded, independent report commissioned by the PCC in 2017 stated “Our analysis indicates that there is not a case for change on performance or public safety grounds for fire and rescue”. The PCC’s amended report provides no concrete examples of how governance change would improve public safety.



***GCC remains absolutely committed to exploring opportunities to reduce the public estate and share buildings and facilities throughout the county with the police.***

## 5. No shared property benefits

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**The proposals identify no genuine opportunities to deliver savings or efficiencies from the public estate, beyond proposals which have already been explored.**

Gloucestershire County Council leads the 'One Public Estate' programme for the county, where GFRS commits 21 fire station locations in addition to sharing space at the Tri-Service Emergency Services Centre (GTEC), Quedgeley with the police and ambulance service.

In addition to GTEC, there are several excellent examples of successful estate collaboration achieved through this programme, including:

- Shared estates between Gloucestershire Police and GFRS in Lydney in the Forest of Dean
- Shared use of the acclaimed SkillZone facility between GFRS and Gloucestershire Police
- Agreed PCSO use of all fire stations across Gloucestershire (including a commitment to make stations accessible to police officers whenever required)
- Agreed access to all fire stations by SWAST (South West Ambulance Service)

GCC remains absolutely committed to exploring opportunities to reduce the public estate and share buildings and facilities throughout the county with the police. What the PCC case fails to highlight, however, is that this can be done completely independently of the governance of police and fire services.

The PCC's business case references the co-location of three rural police stations into retained fire stations as a key benefit, delivering an estimated capital receipt of £2.3 million. This was a proposal originally made at the existing blue light collaboration board, GESCB. At the time, the PCC proposed that GFRS contribute to the capital costs of the change, but not benefit from any of the capital receipts that the police would realise from selling their stations. This was felt to be an unjustified transfer of funding from GFRS to Gloucestershire Constabulary (GC). Indeed, this project could go ahead under current governance arrangements if the PCC would agree to either meet the costs of the necessary adaption or share the capital receipt. As the PCC has stated that, even under a changed governance model, it would not be possible for GFRS funding to subsidise GC, the proposed governance change has no relation to the viability of this project.

There are examples of police and fire and rescue services building collaboration from around the country which illustrate this point. In Suffolk for instance, where the fire and rescue service is embedded within the county council, two thirds of the county's fire stations double as police stations. In Nottinghamshire, which has a stand-alone Fire Authority, several fire stations double as police stations, without needing to bring together the governance of the services. This sort of co-location model between fire and police can work anywhere, where there is a genuine partnership will.

The PCC's proposals calls for the withdrawal by GFRS from existing regionally shared fire training arrangements, and instead re-procuring new training facilities with the police. There is no estimate for the cost of this facility. Firefighter training currently takes place in a state of the art facility in Severn Park, which includes facilities such as carbonaceous training units, an LP gas training house, multi-purpose industrial building, and a flange fire simulator. It is difficult to see what use Gloucestershire Police trainees would make from these facilities, were they to be re-provided in Gloucestershire, nor how the multi-million pound cost of providing them would provide any efficiency savings from current arrangements.

Lastly, as noted earlier, its very disappointing that the case put forward by the PCC indicates that any financial benefits from co-location should be put towards meeting the cost of transition arising from its proposed change of governance, instead of directly benefitting the taxpayer if changes happened without a governance change.

## 6. Flawed consultation methodology/analysis

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### **The PCC's claims of public support for the proposals don't stand up to scrutiny.**

GCC was so concerned at the approach to consultation taken by the PCC and the conclusions drawn from that consultation, that it commissioned an independent review by the respected lead UK advisor, the Consultation Institute (tCI).

A copy of tCI's independent review is attached at Appendix 4. In summary, these are the tCI's greatest concerns with what the PCC did, and the errors in how the PCC analysed those results:

- There was insufficient time granted for the consultation: 6 weeks 2 days, barely half the recommended minimum 12 weeks
- Paper copies of the PCC's case were only submitted to libraries on 10th Dec, just 12 days before consultation closed
- tCI points out that no stakeholder prioritisation or mapping was undertaken, citing this as evidence of poor analysis of consultation feedback
- tCI recommends that consultees should always be made aware who is consulting and for what purpose. They state this was not done.
- tCI highlight unreasonable and unfair claims regarding GFRS staff consultation, namely:
  - No staff attended one of the meetings, feedback to tCI was that staff felt intimidated at having to attend police HQ for this event
  - Too short notice period, and no specific feedback provided by PCC on views of staff, an important omission given the crucial importance of views from this stakeholder group
  - The views of the Fire Brigades union (FBU) were discounted by PCC for political reasons, even though they are a key representative group for the staff
- "tCI would normally expect to see stronger efforts made to encourage staff to make their views known directly, and to have a clearer analysis of the views of staff in the consultation findings"
- The options appraisal in the LBC does not numerically score each of the governance options: such a presentation would have allowed the reader to understand more clearly why the recommended governance model was selected, "and provided a stronger opportunity for the scoring of options to be scrutinised"
- The document is long and complicated, and would have benefitted from a stronger and more balanced executive summary
- There is no description of the decision-making process and how the findings of the consultation will be used to influence decision-making
- The introductory section appears overtly positive and is designed to communicate the benefits of changing to the new governance model, rather than offering a more balanced perspective of the model
- There is no separate questionnaire provided
- The introduction to the consultation, the current situation and proposed changes were not consistently described across different questionnaires
- The various models were not adequately described in terms of benefits and disadvantages
- Important information about the proposals was not included or incorrectly described in the online introduction
- The first question was not appropriately worded and does not offer respondents the option to express an opinion between the four governance options available: it forces the respondent to answer a closed question regarding support of the PCC preferred option only
- There is no mechanism for the respondent to raise any other concerns or issues they may wish to make
- Concerns over the non-transparent analysis of the consultation being undertaken by PCC's own staff, even though the consultation was undertaken by an independent third-party agency, in contradiction of good practice
- Concerns that the PCC's case does not describe the cause of the concerns raised by GCC and other stakeholders who disagreed with their proposal in sufficient detail to enable the reader to understand the full extent of why views are held
- Criticism of 'selective reporting' of the public survey data, which is not consistent with the more detailed findings in the supporting documentation, and the conflation of survey data collected from online and on-street surveys to represent

the overall view of the public, an approach which “is not consistent with accepted market research and data analysis practice.” Similarly, the PCC’s analysis selectively removed ‘not sure’ respondents from the survey findings, also poor practice

- The way this data is currently presented does not allow the reader to understand that in the on-street survey, there was a more negative response to the proposals than in the online survey
- The concluding section of the PCC case does not address any of the issues and concerns raised, nor suggest how the PCC has considered each of these issues, which suggests that consideration of the contentious findings may not have been undertaken

Supporting Document 06 in the PCC’s case shows the online poll was hijacked by activists with concerns about unconnected council decisions, although this is not referenced in the main report. The supporting document showed that 43% of respondents who left a free-text message referred to building of an incinerator in the county, or dislike of local councillors. However, whilst highlighted in the supporting document, this is not referenced in the business case.

**GCC believes these fundamental flaws legally undermine both the required consultation and the business case submission itself.**



## 7. Widespread stakeholder opposition

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The county council's opposition was expressed by a motion supported by all political parties in November 2018 which stated:

"This council restates its opposition to proposals to transfer the governance of Gloucestershire Fire and Rescue Service from the county council to the Police and Crime Commissioner. We call on the Police and Crime Commissioner to abandon the plan, and, if he does not, for the Home Secretary to reject it."

But what was also demonstrated through the PCC's consultation was the far wider opposition to this proposal, expressed by local MPs and many other agencies that work in partnership with the fire and rescue service.

Five of Gloucestershire's six MPs felt strongly and wrote a joint letter of opposition, stating:

"In this environment, we believe that Police and Crime Commissioners should ensure that every aspect of the police budget is spent wisely. We do not believe that re-opening the issue of amalgamating the fire and rescue service into the Gloucestershire Constabulary is helpful to this. We are therefore surprised that after one expensive inquiry found no proven financial benefits you have decided to launch another enquiry – likely to cost the constabulary yet more. This would not be compatible with our drive for value for money."

**Sir Geoffrey Clifton-Brown MP** The Cotswolds

**Alex Chalk MP** Cheltenham

**Richard Graham MP** Gloucester

**Rt Hon Mark Harper MP** Forest of Dean

**Laurence Robertson MP** Tewkesbury

All six of the six district councils in Gloucestershire wrote letters of concern and objection to the PCC's case for change <sup>1</sup>. Comments from these letters include:

"Out of the four options under consideration, the three political groups would prefer to remain with the Status Quo...we remain to be convinced that your proposals for the fire service provide an effective substitute for existing democratic services which are already holding the fire service to account."

**Cheltenham Borough Council**

"Having reviewed the consultation document, we are not convinced that the outline business case for your proposals has been clearly demonstrated and, therefore, we cannot support your proposed approach."

**Cotswold District Council**

"Those present...did not consider that at this stage the business case had been clearly demonstrated"

**Forest of Dean District Council**

"Joined up services with the county council such as firefighters responding to the telecare alarms of vulnerable older people, and targeting safe and well checks using social care information to identify the most vulnerable, would be undermined. When this issue has been carefully examined so recently, and no benefits identified, it seems difficult to justify spending further time or money on this issue. Your latest business case does nothing to change this view."

**Gloucester City Council**

"...we are not convinced that your proposal to take over the running of the service from the county council is the answer. The business case would appear to be the same as the one proposed in 2017. We do not think that the business case for change of this order has been clearly demonstrated."

**Stroud District Council**

"Tewkesbury Borough Council considers that the Police and Crime Commissioner's 'Case for Change' business case is ill-founded, and would, if implemented, be likely to deliver a deterioration in the standards of fire and rescue service currently experienced by the residents of the borough"

**Tewkesbury Borough Council**

**Gloucestershire Clinical Commissioning Group wrote a letter (Appendix 5) of strong support of GFRS' impact on the preventative agenda.**

**It said:**

"It is also worthy of note that our shared work with GFRS is currently held up as national best practice by the Department of Health and Local Government Association.

The impact of the fire service on the health and social care system (from all their work) was quantified as around £2.9m benefit to the system in 2016.

Analysis showed that the cost of commissioning equivalent service from independent sector providers rather than from fire and rescue has been calculated at £1.35m per year. "

**The South West Branch of the Fire Brigades Union wrote to express its opposition to this proposal, in line with the national stance of that union:**

"...we are wholly against this proposed takeover of the fire and rescue service...we feel that your proposals would not promote or enhance efficiency, economy and public safety..."

**Lastly, among others to express their opposition to the PCC's proposal were three of the larger town councils in the county: Stroud, Stow-On-The-Wold and Moreton:**

"Stroud Town Council recently considered the consultation and survey and agreed it does not support the two services being run by the PCC."  
**Stroud Town Council**

"Resolved...that the clerk should write to Mr Peter Bungard, Chief Executive of GCC to give full support to them retaining governance of GFRS."

**Stow-On-The-Wold Town Council**

"Resolved to ask the Finance and Governance Committee to express the council's support for GCC retaining responsibility for the fire service"

**Moreton Town Council**



<sup>1</sup> Other than the letter from the CCG, copies of the letters of opposition are included in the document pack 04 which accompanied PCC's business case.

## 8. Conclusion

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### **The case put forward by the PCC simply does not stack up.**

A number of financial claims have been made that may look favourable for the PCC but would result in millions of pounds of additional costs being loaded onto the council, impacting on vital services for communities, for no identifiable benefit whatsoever.

The ability for the public to scrutinise decision related to and performance of the fire and rescue service would be seriously reduced under the PCC's plan, with decisions being taken by him alone, behind closed doors.

GFRS has become an integral part of delivering the health and social care agenda, supporting thousands of vulnerable people to remain safe and well in their own home, which is what they have told us they want. The PCC's plan would wrench GFRS out of the wider community, of which it has become an invaluable member.

GCC stands ready to go on integrating with blue light colleagues, where it makes sense and supports better, more joined up service delivery. There are many examples around the country of fire and rescue services who have integrated with other blue light services, without a change in governance arrangements - its simply not necessary and diverts time, resources and funding away from delivering for communities.

Finally, there is simply no support for the proposed change. Public sector partners and MPs from across the county have written to the PCC to express their concerns about and opposition to his plan. The consultation process and analysis the PCC has relied on has been scrutinised by market leaders, the Consultation Institute, who found the whole exercise seriously wanting.

Increased costs, reduced service delivery, broken partnerships and no support are all clear indicators that the PCC does not have a case that stacks up. No further time, energy or money should be spent on this flawed and unnecessary exercise.



# Appendix

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Gloucestershire  
**Fire and Rescue Service**  
Working together for a safer Gloucestershire



**Gloucestershire**  
COUNTY COUNCIL