# **Kent & Medway Fire & Rescue Authority**

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Dear Mr How

# South East Regional Management Board Comments on the Fire Control Business Case Part 1 – Regional Case for the South East

I refer to the recent issue of the regional Business Case for the Fire Control Project in which you requested comments by the 30 September 2008, subsequently extended for the South East by two weeks. As Vice-Chairman of the South East Regional Management Board, I am authorised to write to you with the comments of the Board, which we discussed at a meeting on 8 October 2008.

Before I outline these comments, I should reiterate the South East Regional Management Board's (RMB's) commitment to the LGA/CFOA's stated position and the achievement of a viable Regional Control Centre.

In addition, I must also advise you of the RMB's overarching concern that if the areas identified within this letter are not resolved, then they will begin to impact, to varying degrees, on individual Fire and Rescue Authority risk assessments which will, in turn, impact on the ability of those Authorities in meeting their strategic responsibilities.

The response from the South East Regional Management Board (RMB) is divided into general and specific details, and seeks to embrace the thoughts of RMB Members and will not, necessarily, reflect those comments made by individual Fire and Rescue Authorities.

#### 1. General Comments

Firstly, I must express our profound disappointment that the Business Case was not released on the well publicised date of 30 June.

Members had high expectations that the long awaited answers that they had been requesting





Kent & Medway Fire & Rescue Authority provides fire services through Kent Fire & Rescue Service Chairman Bryan Cope would be forthcoming and the failure to publish by the due date eroded members' confidence in the project. We were also very surprised at the manner in which the Business Case was released, i.e. in two parts, one of which has yet to be issued. We have been informed by our officers that they too were very surprised at the manner of the release which does nothing to promote or support the partnership approach that is so often quoted by CLG.

#### Funding - General

Discussions at RMB over recent years have focussed on financial savings. We were sceptical from the start when, in 2003, we were told that there would be 30% savings from the Fire Control Project but we have seen this fall steadily over the years as we predicted.

Some costs are presently unquantifiable, i.e. data. It is clear to members and officers in the South East that true costs of the Regional Control Centre Project will not be known until the centre has been operating in steady state for some time. Therefore, we cannot see the logic in the costs or savings being fixed at this moment in time especially this far before go live.

### Funding – Resilience Payment

Although a matter for individual Fire and Rescue Authorities, the RMB has discussed the potential of Fire & Rescue Authorities being unlikely to agree in principle to transfer its operations into the Regional Control Centre if there was to be an increase in costs at an individual FRA level.

Neither is it considered likely to be acceptable for those Fire and Rescue Authorities showing savings to subsidise those in a cost situation and we would need to consider the legality of such an approach. Therefore, in order to avoid compulsion through Section 29 of the Fire and Rescue Services Act, it is the RMB's belief that CLG must find a mechanism to offer savings to each Fire & Rescue Authorities.

If government insists on maintaining the present policy of regional resilience payments, then the capping of that payment to three years is unacceptable.

As a result early announcement of the specifics of the Resilience Payment is essential, not just with regard to the net payment principle, but also the period of time over which it is envisaged it will be paid and whether the calculation will be subject to review.

#### Funding - National Resilience

We fail to understand why Fire and Rescue Authorities are bearing the cost of national resilience. If Fire & Rescue Authorities were building or installing new Fire Controls they would not be installing the level of resilience that is specified for this project. That is a government decision and it is therefore our view that government should bear the cost of that national resilience. We consider that the best way to do this would be for CLG to calculate the extra cost of the resilient aspects of the project, e.g. increased costs for the building, the





FM contract and the infrastructure services contract, and to make those payments centrally. This would simply be an alternative way of distributing funding but its effect would most likely be to place all Fire & Rescue Authorities in the South East in a savings situation which would go some way to realising the promises which were made at the commencement of the Project.

#### Out of Scope Activity

One area that seems to have been understated is in respect of the remaining activities that the current control rooms provide to FRAs. From discussions around the south east region the rough apportionment seems to equate to be around a 60:40 split with 40% of funding required to maintain out of scope work. Much more detailed work now needs to be done by the FRAs on an individual basis but it would appear that this level of financial provision has not been factored into the regional business case.

Across the region there remains considerable scepticism about whether the residual activities that will remain with FRAs will be deliverable for as little as £0.218m. That figure averages at less than £25,000 per FRA, in particular, it does not allow for the wider contribution that control rooms make towards corporate objectives. The project seemingly regards such activity as laying outside its remit, which is completely unacceptable since that work will continue to need to be undertaken. Not to recognise this in the business case is tantamount to passing an unfunded burden to the FRAs so affected.

## Financial Planning

The size and complexity of this project is fully recognised by Members and it would not be unreasonable to anticipate that further changes in the implementation timetable will occur, particularly, with the close proximity of the 2012 Olympic Games. For most FRAs the implementation of the RCC now falls within the timeframe of the 2009/10 to 2011/12 medium term financial plans and judgements will have to be made about resource impact. Given the many unknowns surrounding the detail and cost associated with out of scope activities, together with the questions surrounding the phasing of the release of existing control room budgets, as well as the possibility of further slippage, it is difficult to forecast the impact with any degree of certainty. It may therefore be necessary to secure additional flexibility from the CLG to increase and extend its new burdens funding, or provide some for of transitional grant, to cushion the impact of cost.

# Regional v National Assumptions

We understand that national assumptions have been used in the Business Case. We acknowledge that this was necessary in order to gauge true comparisons between regions. However, in analysing the Business Case at a regional level we need to use regional assumptions and actual data.





# (a) Local Authority Controlled Company (LACC)

LACC running costs have been estimated locally at more than calculated by CLG. This figure is made up of actual costs being incurred on staff within Fire and Rescue Authorities who may transfer or be appointed. It also includes some assumed (but prudent) costs for utilities, company running costs, etc.

# (b) Data

The staffing model has recently been changed with no consultation with FRAs or project officers. CLG now assumes there will only be two persons within the Regional Control Centre to perform all data related functions. The allocation of an extra 0.5 person per Fire and Rescue Authority is considered to be substantially underestimated. It is also the case that increased data requirements may fall disproportionately on Fire and Rescue Services in the South East, as those who do not have a substantial data capability at present will require more personnel than those with a higher current capability. This has not been taken into account as far as we are aware.

#### Staff Modelling

The RMB is now only just considering the implications of the staff modelling as contained within the Business Case. On early reflection, it has concerns that the crewing levels suggested may be incompatible with the effective and efficient running of an Emergency Fire Control Centre.

#### 2. Specific Comments

- a) There are some minor inaccuracies in the detail of Table 4, and in the dates of Table 7.
- b) Current Control Room Costs: We know that you are already aware of our views on the verification of existing costs done by the independent consultants (paragraphs 1.21, 2.44). The South East Fire and Rescue Authorities had welcomed this work, and put considerable effort into ensuring that the information available to the consultants would reflect cashable savings. We were therefore dismayed by the abrupt truncation of the work and the consequent inaccuracy in comparing current control room costs with predicted costs in the Regional Case.
- c) **Predicted RCC costs:** We are concerned at the number of unknown costs at this point in the project:
- d) The review of Business Case Assumptions referred to (1.20, 2.47) was welcome and clarified a number of areas, but was rushed, did not go into detail, and ignored feedback on some key areas of concern.
- e) Lack of detail about the system design means we cannot predict the resources needed to service the RCC, which will be additional to current costs.





- f) Recent work has created doubts about the robustness of the RCC Organisational Design. Although it is recognised that CLG has put considerable effort into developing and explaining the control room staffing model, it has always been a theoretical model, which is proving problematic to put into a real-life shift pattern. Little evidence has been presented on the staffing of the support side of the RCC. Concerns therefore remain that the RCC staffing costs will be more than predicted, possibly substantially.
- g) Group Services: although we were told in 2006 that development of Group Services was a priority, very little information has been forthcoming. We remain unsure about CLG's proposed approach and the projected costs of a function that will be essential for realizing the benefits of a national system.
- h) Outside of the Business Case itself, we remain very uneasy about the timescales of the project, especially given the continued lack of detailed information, 18 months after IS contract signature, to allow FRAs to plan their resource and budgets. Ultimately, any issue with timescales may also impact upon FRAs' existing mobilising systems, and FRAs' ability to continue to fulfill their statutory obligations.

The Board is sure that we do not need to reassure you that we will continue to work in support of this project provided it does demonstrate the much improved service described in this and previous versions of the Business Case. However, we would respectfully suggest and request further activities to address our remaining concerns.

Whilst not a direct part of the regional FireControl business case and therefore not a central part of our comments, we would wish to reiterate our concerns over the implementation issues of Firelink and its impact on the FireControl Project and 'vice versa'. The central coordination of both projects is central to its final success and further work needs to be undertaken to ensure this outcome is achieved.

In conclusion, it would appear that on current evidence, FRAs in the South East are unlikely to commit to moving into the RCC under current CLG proposals until all of our concerns are answered.

The comments within this letter are understandably critical of CLG in the manner that this project has been managed. However, we hope that some of the suggestions contained within the letter will assist CLG in gaining the support of the Fire and Rescue Authorities not only in the South East but across the country.

Yours sincerely

**B R Cope** 

Vice Chairman
South East Regional Management Board



