

REPORT OF THE PRINCIPAL INSPECTION OF TAYSIDE FIRE BRIGADE 2003



HM Fire Service Inspectorate for Scotland





PRINCIPAL INSPECTION REPORT
TAYSIDE FIRE BRIGADE

February 2003

A Report by
HM Fire Service Inspectorate for Scotland
St Andrew's House
Edinburgh

INTRODUCTION

1. A Principal Inspection was conducted during the latter part of the 2002-2003 inspection year, between 25-27 February 2003, with the main attendance at Dundee. Present were Dennis Davis, Allan Whitton and Mark Jones of HM Fire Service Inspectorate, Bruce Crosbie of Audit Scotland, the Brigade's external Auditor, also attended. Following the retirement of Firemaster Derek Marr, Deputy Firemaster Stephen Hunter BSc MBA MCGI FIFireE, was appointed Firemaster on 18 December 2001 and was present throughout the inspection.

2. During the inspection a number of key issues were identified:

- ◆ **Service Planning can be further improved through better integration and definition of the aims, resources and allocation processes.**
- ◆ **Further development of Departmental Plans in all areas, using SMART criteria, will improve the Brigade's ability to work strategically.**
- ◆ **Review of training development structures should not be unnecessarily delayed in anticipation of the forthcoming national Integrated Personal Development System.**
- ◆ **The Structure of Operations should be reviewed.**
- ◆ **A formal, structured Procurement Policy should be developed and implemented.**
- ◆ **Fire Safety Departmental organisation, within the corporate framework, requires better definition.**

3. Whilst the Convener, Mrs Duncan, and Vice Convener, Mr Farquhar, who were not seen during this inspection, were noted as continuing in post, it was advised this would change in the forthcoming May 2003 elections when, in accordance with standing conventions, these posts would transfer between the Angus and Dundee Councils.

4. The fire service at a UK level was involved in a national dispute at the time of the inspection and in recognition of the sensitive nature of this situation the programme of inspection was modified slightly. Overall the Firemaster reported that industrial relations were constructive.

5. This report highlights in bold text areas for further consideration to assist in the process of continuous improvement and those of good practice. The purpose of this approach is to enable the Firemaster and other Brigade managers the opportunity to review, together with members of the Fire Board, the findings arising from the inspection. Having reviewed the findings it is suggested that action is taken in a programmed and targeted way to ensure advancement of the Brigade, either through the structured Brigade Service Plan or a specific action plan. HM Fire Service Inspectorate will review this progress during Performance Monitoring Inspections that will occur during the next two years.

6. By adopting this approach HM Fire Service Inspectorate believes sufficient time, and where required resource, can be allocated to secure the longer-term progress required in some areas.



7. It should also be noted that highlighting matters for further consideration is not intended to suggest that only the need for improvement was identified during the inspection. On the contrary, since fire brigades are extensive and complex organisations, the focus for improvement commences from a position that satisfactory performance exists in all areas and that in some, shows good practice.

8. Some of these good practice areas in the case of Tayside Fire Brigade are:

- ◆ **Partnership working in operational and fire safety activities.**
- ◆ **The Brigade's system for Health and Safety information sharing is effective and reflects suitable prioritisation.**
- ◆ **The 'ground up' approach to using information technology which supports staff wishing to raise their computer awareness and competency.**

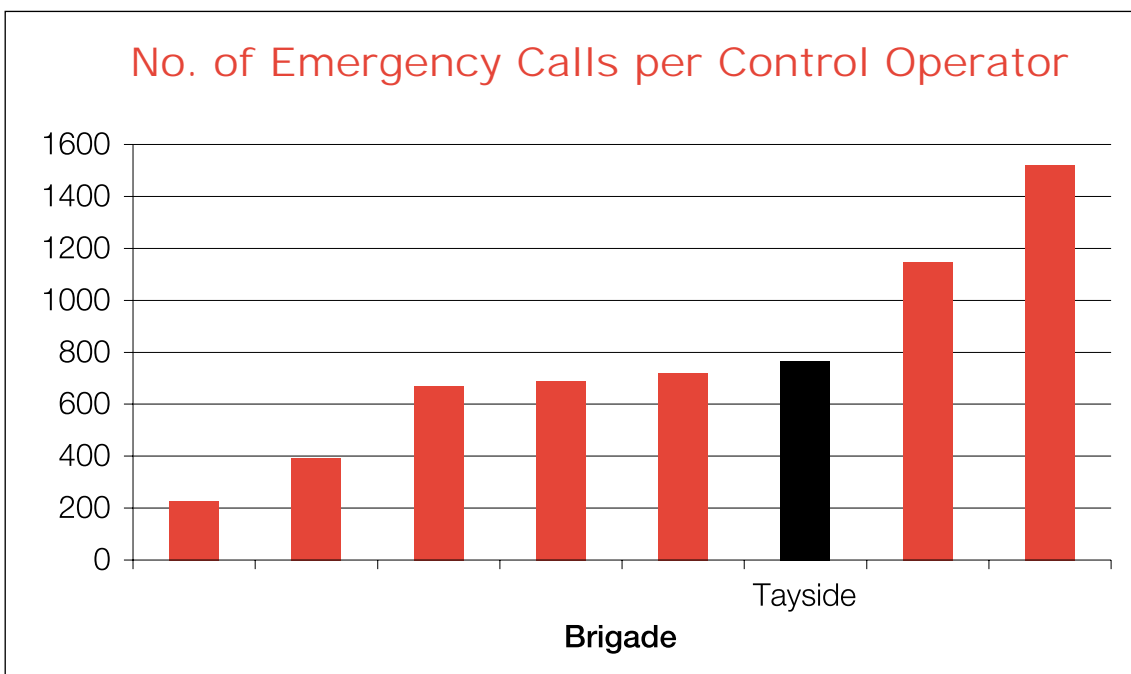
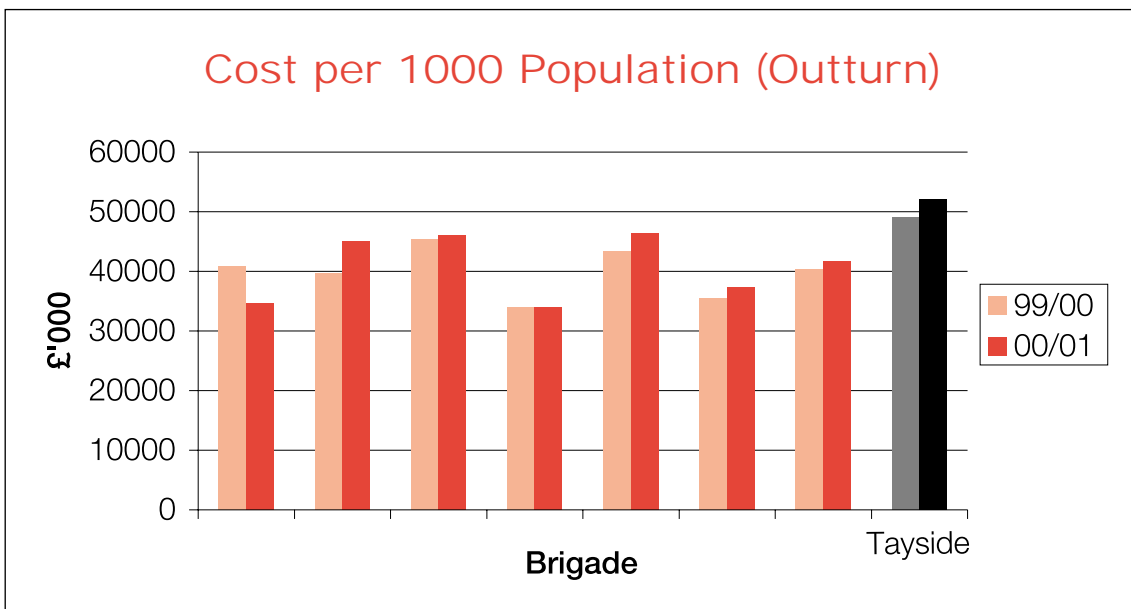
9. Overall, the service delivered by Tayside Fire Brigade is considered efficient, although the identified gaps in the information gathered during this Principal Inspection suggest managerial improvement is required.

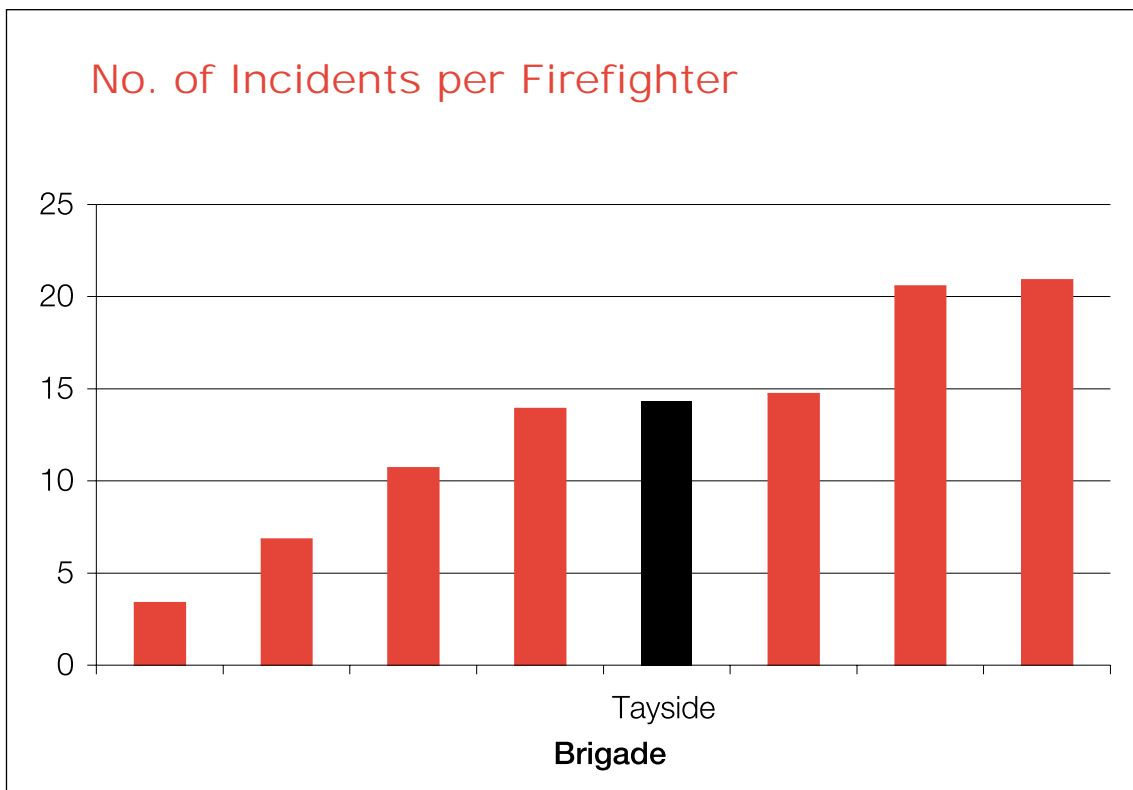
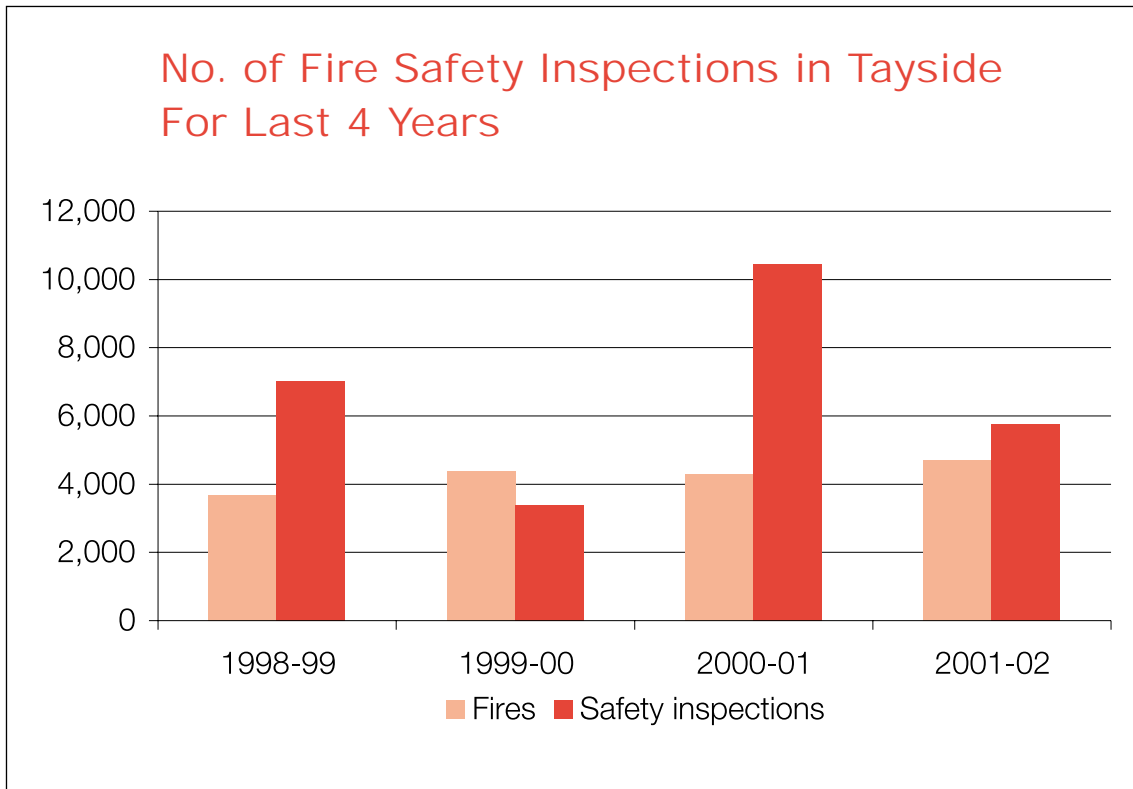


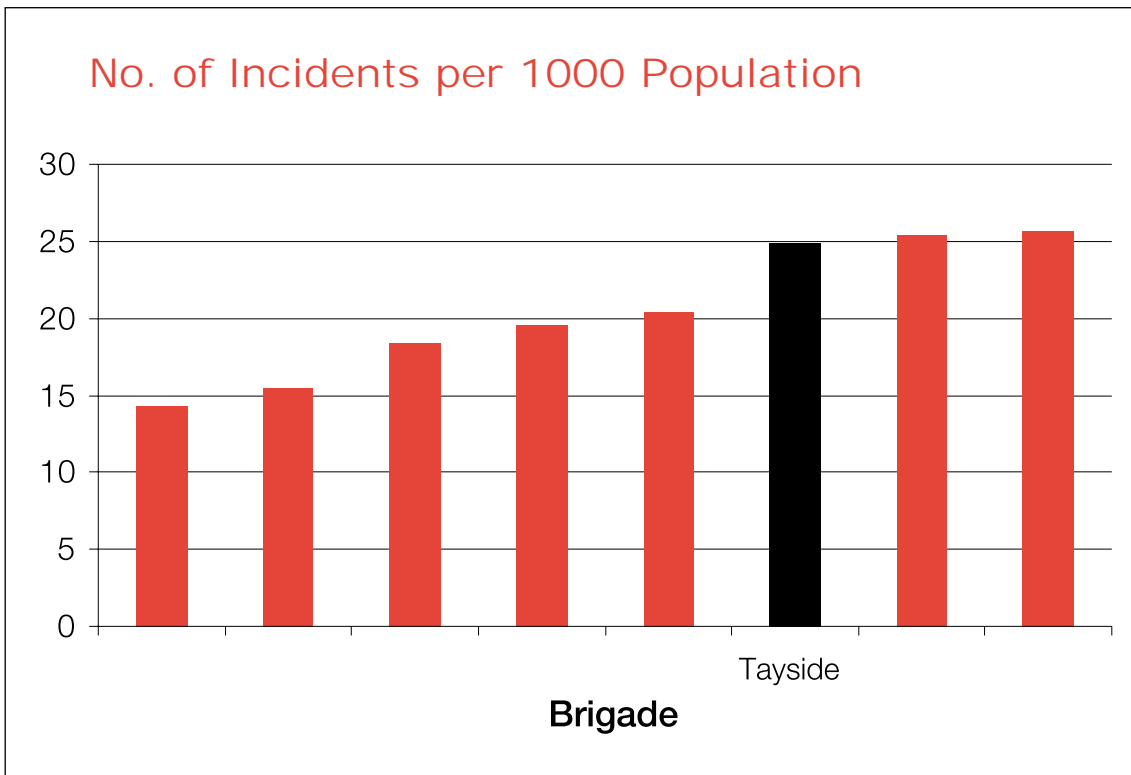
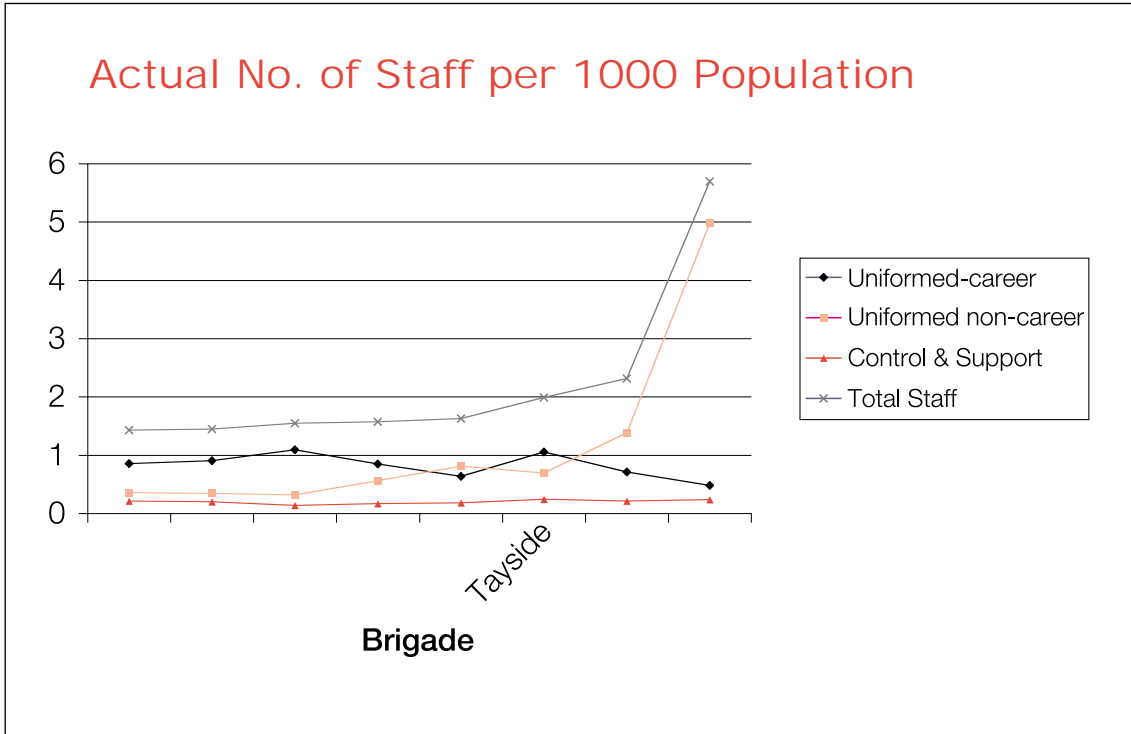
COMPARISON AND TRENDS BETWEEN ALL SCOTTISH BRIGADES

Sampling performance within Scotland

10. Tayside Fire Brigade has the highest cost of provision per 1000 population in Scotland and in common with most other brigades this cost has risen slightly over the previous year's. The number of calls per Control operator is among the mid-range for Scotland as is the number of incidents per Firefighter. This reflects the fact that the Brigade employ 1.99 staff per 1000 population – towards the upper end of the majority of Scottish Brigades. However, the number of incidents per 1000 population is among the higher end of the scale in Scotland.







STRATEGIC MANAGEMENT

Strategic Management is concerned with leadership direction and effective performance of desired outcomes.

Activities include management and planning of all resources and assets together with financial and performance monitoring. Consultation and information management are also important aspects with this activity.

Overview

11. There has been a perceived change in outlook and enthusiasm which suggests the stage is now set to develop further strategy and managerial commitment. The discussions held revealed enthusiasm and understanding in many areas. Less than satisfactory progress was found in a few areas whilst the majority indicated a framework for planning, monitoring and review had been established. Taking this on to the next developmental level is important. The following areas for improvement were identified:

- ◆ Outstanding reviews of areas of resource utilisation should be undertaken urgently.
- ◆ The planning framework needs enhancement to ensure objectives meet defined corporate aims and that resource allocations are systematically identified and allocated.
- ◆ Documenting existing practices to manage business continuity and management performance would be helpful – demonstrating quality and outputs.
- ◆ Best Value requirements could be enhanced by subjecting projects to wider external comparison.
- ◆ Information and knowledge management is at an early and important stage of development. The strategy should be subjected to wide review, given its importance to the Brigade, including the Inspectorate before implementation.

Performance Monitoring Inspection 2001

12. Discussion of issues arising from the previous Performance Monitoring Inspection, conducted between 18-21 September 2001, were held. In some areas steady progress had been made. In particular it was also found that the Scottish Executive had responded positively to both pension and training needs identified on the earlier inspection. This has released additional funding and provided capital consent to enable a realistic fire training facility to be installed at Perth.

13. Pension spending had been assisted by the Scottish Executive and the Firemaster reported the coming year is unlikely to present similar expenditure problems.



14. Outstanding identified improvements still requiring drawing to a conclusion, are:

- ◆ Availability of appliances.
- ◆ Staffing for ridership requirements.
- ◆ Confirmation for approval purposes of the establishment variations.
- ◆ Formal review of support staff requirements.

15. It is recognised that the current national industrial relations situation has inevitably delayed bringing many of these issues to a conclusion. However, this is a situation needing some urgent clarification. For example, the existing management system at the Brigade command level does not suggest resilience or corporate capacity. It is reliant on two officers continuing to provide 24-hour cover 365 days a year and meeting the decision and strategic leadership of the wide portfolios of responsibilities which now face all fire authorities. This arrangement exists alongside a hierarchical two Division system. **Attention should be given to meeting these issues, outstanding from 2002, as soon as possible.**

Capital Project

16. The new training facility at Perth was visited during the inspection and is well advanced. Additional development on site, to provide silo and road accident training with further improvements to the existing station training tower and breathing apparatus building, are being provided. The development is greater than that originally perceived in the application for consent, which was essentially for realistic facilities.

17. The Perth project is being managed and developed under the Partnership Project mechanism identified in the *Rethinking Construction* publication resulting from the study led by Sir John Egan on behalf of the UK Government. The partnership approach has provided a number of direct opportunities to achieve savings, for the contractor and client, on construction work. At Perth this method of working has proved helpful in overcoming groundwork difficulties occasioned by ground contamination and debris removal, which under a normal construction contract may well have caused delays and extended formal contractual negotiation.

Service Planning

18. Progress is being made in advancing the service planning process, which has now been published in an improved form for two years. The Service Plan offered as evidence and considered during the inspection related to the 2002-2003 year and was structured around the concept of four functional aims relating to prevention, intervention, people and performance. There is ample evidence that the planning process has a foundation based around achievement with monitoring leading to continuous improvement. Stakeholder consultation has been gathered primarily by an external survey conducted by an independent consultancy and the Fire Board both annually approves the plan and monitors performance outturn.



19. There is therefore the basis of a substantial planning process. **This could be further improved by providing a better series of corporate objectives and indications of the clear mechanisms which link the Service Plan to the financial and physical assets to be deployed.** There appeared little evidence that the integrated mechanism referred to exists in a systematic way, although it is recognised that at Board and at senior officer level there are discussions during the budget-setting process. However, the two processes of service and financial planning, need better integration. It would also be helpful if the Fire Board were more engaged in setting the objectives and exercising judgement on options.

20. There has been a continuing growth in the networking and partnership arrangements which can influence the planning thinking and outcomes. This is an aspect of strategic development likely to add to the formal consultation already undertaken. Examples given included working with local authorities in community safety initiatives, partnering the Prince's Trust Volunteers, supporting Tayside Health Trust non-smoking initiative and developing long-term relationships with Abertay University.

21. Although **little detailed consideration had been given to business continuity** in a review discussion it was observed that most issues likely to impact upon the Brigade had been thought about and were therefore probably within acceptable risk boundaries. Documenting this process would be helpful. The provision of services to the Board and the Brigade are supplied by the three constituent Councils and thereby provide resilience for key support functions, such as payroll management, capital assets or information technology.

Managerial Commitment

22. The Brigade does not operate a formal staff management appraisal or personal development system. It envisages the national Integrated Personal Development System will effectively fill this gap and prefers to await outcomes of the national system. Whilst this is understandable, progress should not be unnecessarily delayed and a form of appraisal should be introduced. Devolution in decision making and allied functions, such as budget management, is progressively occurring with senior managers, members of the Best Value Group or Management Team, being engaged in service planning and budget formulation. The Brigade is also shortly to adopt the EFQM quality approach and members of the Management Team have already received preservation. The same managers are also involved in setting the performance indicators used to review achievements.

23. There is therefore evidence that managers are committed to achieving continuous improvement and a less insular approach is evolving in areas such as procurement. One practical example witnessed related to the provision of personal uniform being acquired jointly between Fife, Grampian and Tayside Brigades. **Overall, management commitment is therefore less defined than in many other brigades and further action in this area would be useful.**



Resource Management

24. Mention has been made of the issue of review of the management structure outstanding in the previous report. This review needs to link the planning and organisational relationships already described in this report. It should also **rectify minor outstanding errors in the Brigade establishment** relating to SDO and ADO posts, which have not been filled for many years. It would be sensible to include in this review any future requirements of the Brigade which may arise from the current national considerations.

25. There is a planned programme of Best Value Reviews and in the current year these include reviews of fire cover in Dundee, driver training, information technology support, frequency of fire safety inspection, premise cleaning services and fire control. **Whilst some of these reviews had been initiated, others had not.** For example the fire control review had been held pending consideration of national issues, the Dundee cover review related specifically to attendance time performance rather than risk analysis and the IT support review was ongoing, a data assessment stage having been commenced.

26. A Best Value Review was examined relating to Occupational Health Services. This BVR had followed guidance produced by CACFOA and included elements of comparison with other Scottish brigades. The review had advanced to an options stage to allow consideration of staff changes and an improvement in the range of services offered. External comparison, resource challenge and a decisive stage had therefore yet to be determined. In this BVR there was the added linkage of an external provider of part of the service who had acted as an external adviser. Whilst the BVR process had been adapted to reflect these features the outcome, which was projected over another year, was likely to be beneficial. **Testing during the coming year of the options within a wider group of external providers and users would help demonstrate a more rigorous process.**

27. Operational resource utilisation has been commented upon previously and **it is unfortunate better progress had not been made on review of issues like the ridership factor, availability of pumping appliances and usage of special appliances. The area risk review is outdated and not well documented.** There is a need to draw these matters together within a future plan and to carefully consider realignment of resources to operational work patterns. For example the relatively low activity rates at Balmossie and higher level of resources localised around central Dundee. The current national activities will no doubt impact upon such considerations, but sensible action could be taken to bring together data sources to enable a full programme of review to go ahead.

28. Arrangements are underway to increase prime mover and demountable units and a **good example of collaboration was seen with the demonstration of a closed circuit television unit linked to a new command module.** The CCTV unit was provided under a community safety partnership between Dundee Council, Tayside Police and the Brigade and illustrated valuable technology being mutually provided for common benefits.

29. Mention has also already been made of the need to review non-rider provision. The overall scale of the number of staff available, a minimum of five command officers with a Principal Officer supported by rider Station Officers, appears appropriate, but **there is value in reviewing responsibilities and ranks.**



Consultation

30. A formal meeting is held on a monthly basis with the Fire Brigades Union and opportunity was taken to briefly discuss, in a mobile telephone conversation, the overall industrial relations situation with a senior member of the local FBU Branch. He confirmed there were no outstanding issues and where necessary use was made of the established consultation and negotiation arrangements to resolve issues in a satisfactory manner.

31. The Brigade had engaged external consultants to conduct a public opinion survey and is clearly working with a number of partners in the local community. An example of joint working with specific community groups was the Race Equality Scheme being jointly advanced by Tayside Police and the three constituent Councils. **No media plan exists as such**, but ample evidence of sound working relationships with media sources was given.

Information Management

32. Serious consideration is being given to information technology needs and both a strategy and a working group have been created to consider future requirements. At the time of inspection a draft strategy was in the course of preparation. Those responsible recognised the importance of integrated communication technology and technology management and had commenced with a review of user business systems. **The initial objectives appeared well founded and included an initial stage of electronic archive and extended e-mail.**

33. Sub-system software exists in the usual activities of fire safety, transport, personnel, pay, stores and debtor and creditor systems. The Brigade has also advanced the vehicle mounted data system on appliances, with system support in place to ensure currency.

34. The Brigade has also decided to support personnel wishing to engage in the European Computer Driving Licence project designed to raise computer awareness and competency in use. The ECDL project is a collaborative venture with Abertay University and **is illustrative of the overall encouraging approach of creating a 'ground up' approach to using computer technology.**

35. **The completion of the strategy is clearly a key component in the use of IT across the Brigade**, which currently is limited to discrete users that do not, for example, include part-time staff. Further investment in this area is likely to be of significant benefit, given the existing limited coverage.

Performance Monitoring

36. A wide range of 38 performance indicators has been developed. These include 5 Statutory Indicators, 13 Local Indicators, offering across-Scotland comparison, and 10 Brigade Indicators.

37. The Firemaster chairs the CACFOA(S) Best Value Forum and is informed and active in this area. Brigade monitoring is routine and responsible officers evaluate performance to the chosen indicators. Trend analysis is possible using 5 years of data. Exception and variation reporting is undertaken by the Management Team. The chosen indicators reflect current accepted practice and a system of review exists. **Integration of the performance review system within the service planning process is less evident and could be strengthened.**



AUDIT SCOTLAND

The following section, paragraphs 38-62, was prepared following review independent of HM Fire Service Inspectorate, by the Audit Services section of Audit Scotland.

Introduction

38. Her Majesty's Fire Service Inspectorate (HMFSI), following consultation with Audit Scotland, has developed an integrated inspection process that incorporates the key elements of a Performance Management and Planning (PMP) audit.

39. The way in which a fire board and its senior management team supports the strategic management framework of a fire brigade has a significant impact on the achievement of Best Value.

40. Part of the auditor's responsibilities is to be satisfied that a fire board has in place appropriate management arrangements to secure value for money for the resources available to it. With the introduction of the Best Value regime, the guidance issued by HMFSI, based on an established PMP framework, has been used to review the progress that fire boards are making in implementing the framework set out by the Best Value Task Force.

Audit Approach

41. Tayside Fire Board was one of the three Fire Services selected for Principal Inspection by HMFSI in 2002-2003. As part of our 2002-2003 audit we have participated in the Principal Inspection and reviewed Tayside Fire Board's progress in developing a PMP framework within its Financial Management and Capital Financing processes.

42. The Board's management team was requested to complete a self-assessment of its progress against pre-set criteria. The audit task was to verify the self-assessment and agree any revisions.

Findings

43. The broad picture emerging from our review of financial management and capital financing is that Tayside Fire Board has made some progress in implementing a PMP framework in those areas, but that a level of improvement is still required to implement an effective approach.

44. The Brigade has put in place some elements of a sound financial management system, including approved Standing Orders which are regularly reviewed and well documented accountability for the management of budgets. The following areas were identified, however, where improvement could be made:

- ◆ There is no link between the costed Service Plan and the Three Year Budget.
- ◆ The Three Year Budget is not based on full zero-based budgeting.



- ◆ **Variances identified from the review of monthly monitoring reports are not documented agreed actions and monitored to ensure that agreed actions are effective.**

- ◆ **There is no financial model in place to enable prediction of future commitments.**

45. Our review of capital financing/asset management revealed that the Brigade has adopted alternative methods of capital procurement, as part of the Perth Partnership Agreement. The partnership is an alternative to the traditional procurement method of competitive tendering and is an initiative promoted as best practice by the Government, where procurement is based on trust and team work and new procurement methods are used involving evaluation of quality and cost through questionnaire, presentation and interview.

46. Our review also revealed areas of the Brigade's capital financing/asset management procedures which required improvement:

- ◆ **The Brigade's asset base is not currently matched to its objectives.**

- ◆ **A comprehensive asset register is not maintained.**

Management Action

47. Detailed recommendations on those areas where further improvement could be achieved are included in our audit findings report which includes a summarised action plan, submitted separately to the Brigade.

48. The assistance and co-operation we received during the course of our audit is gratefully acknowledged.

Financial Management

49. The financial affairs of the fire authority should be unambiguous, comply with legislation, allow effective delegation and operate with clear public accountability. Reporting should detect and allow approved variations.

50. The key requirements of an effective financial management system are:

- ◆ the existence of comprehensive guidance and control mechanisms which comply with or exceed current statutory requirement;
- ◆ the existence of a well defined budget-setting process;
- ◆ financial procedures or standing orders which permit flexible yet accountable and approved use of budgets by delegated budget managers; and
- ◆ the provision of training and support to ensure that budget holders have the necessary skills for managing budgets.



Audit Findings

51. We are pleased to note the following elements of good practice within the Brigade:

- ◆ **Approved Standing Orders for the regulation of financial matters are in place and are reviewed annually. These were last updated in May 2002.**
- ◆ **Accountability for the management of budgets is documented, with documented procedures submitted to budget holders in late 2001. Monthly reports annotate the budget holder responsible, i.e. head of service.**
- ◆ **The Brigade has set out its commitment to Best Value in its Service Plan and Best Value Service Review Guidance.**
- ◆ **The requirements of the CIPFA Best Value Accounting Code of Practice 2001 introducing the new Service Expenditure Analysis for Fire Services have been implemented. The coding structure within the revenue ledger is now structured to enable benchmarking.**

52. Tayside Fire Board's revenue budget for 2002-2003 is £21.1 million (2.47% above the Grant Aided Expenditure (GAE) assessment). The Board also has a capital budget of £1.26 million. Monitoring reports reveal that actual expenditure in 2002-2003 is expected to be within budget.

53. In a report to the Finance Sub Committee of 28 January 2002, the Firemaster and Treasurer reported that 'every element of the Brigade's expenditure has been reviewed and a budget has been developed which meets the operational requirements of the Brigade for 2002/03'.

54. Our review of the Brigade's Service Plan has revealed that there is currently no link between the Service Plan and the Three Year Budget. The Brigade is aware of this deficiency, however, and intend to develop this in the future. In addition, the Three Year Budget is not fully zero based, with year 1 being zero-based and years 2-3 incremental on year 1.

55. Our review of the Brigade's budgeting process also revealed the following:

- ◆ **The February 2002 Management team paper *Capital Expenditure* recognises that 'the Brigade does not have clear guidelines with respect to the planning, incurring and recording of capital expenditure'. Action to date, on the recommendations contained in the paper has been slow.**
- ◆ **Budget profiling currently used is simplistic. Budget monitoring reports show expenditure to date (expenditure to date/full year budget, as a percentage), there is little evidence of profiling of the budgeted costs.**
- ◆ **The Head of Corporate Services and the Financial Controller review monthly monitoring reports and any significant variances identified are raised with the Firemaster. The Firemaster also carries out an overview of the monitoring reports. However, this does not result in documented agreed actions to manage these variances.**



- ◆ **There is no financial model in place to predict future commitments and inform the financial planning process.** However, a paper is prepared on the determination of pension commitments of the next 10 years.

56. Budgets should be devolved to appropriate budget holders to secure economies through local ownership and control. To be effective, however, this requires the provision of training and support to ensure that the budget holders have the necessary skills for managing budgets. Our review revealed that there is currently little financial training for budget holders. The Brigade is considering the introduction of such training.

Capital Financing/Asset Management

57. Capital intensive programmes require careful assessment and systematic management. Key assets require effective utilisation and planned replacement.

58. The key requirements of an effective capital finance programme are:

- ◆ a clear strategy to manage and maintain the organisation's key assets;
- ◆ planning for the achievable replacement of assets;
- ◆ a thorough assessment of need and consideration of provision options; and
- ◆ all significant assets are accounted for, and regular reviews are undertaken, to ensure they are appropriate and useable by the organisation.

Audit Findings

59. **There is little evidence of a process of matching the Brigade's asset base to what is required to deliver their objectives.** After setting out the objectives via the Service Plan, the Brigade needs to demonstrate how this flows into asset requirements. This would incorporate assessment criteria for identifying asset requirements. In addition, a comprehensive asset register (including testing information) is not maintained. Work is currently underway to produce a register in consultation with all brigades as a national initiative.

60. We are pleased to note that a Capital Monitoring Report is submitted monthly to the Management Team and on a quarterly basis to the Board. The Firemaster also reports any tenders for vehicle and equipment procurement to the Board.

61. Our review of the Brigade's procurement process revealed that the Brigade is considering the development of a more strategic approach to procurement and hence improve its management of key assets. This would include:

- ◆ Consideration of the appointment of a procurement officer to assist with a more systematic approach to procurement within the Brigade.
- ◆ Following the appointment of a procurement officer, consideration of the introduction of a new procurement/stock control system.



62. We are pleased to note that the Brigade has also considered alternative methods of capital procurement, as part of the Perth Partnership Agreement. This is an alternative to the traditional procurement method of competitive tendering and is an initiative promoted as best practice by the Government, where procurement is based on trust and team work and new procurement methods are used involving evaluation of quality and cost through questionnaire, presentation and interview. The benefits generated by effective Partnering include:

- ◆ improvement in delivery, quality and predictability of the end product;
- ◆ improvement in predictability of time and cost;
- ◆ reduction in non-value added costs;
- ◆ improvement in working environment based on co-operation not conflicts;
- ◆ improvement in future long-term working relationships; and
- ◆ improvement in client and user satisfaction.



HUMAN RESOURCES

The development of Human Resources is especially important in the fire service where high levels of competency and availability are a central part of an efficient organisation.

Overview

63. The lack of clear departmental planning across many of the Human Resource arrangements of the Brigade makes the linkage to the Fire Board's corporate aims difficult to note. Many Human Resource areas were said to be awaiting the implementation of the Integrated Personal Development System, yet few examples of preparation for adoption of the system were observed.

Training and Staff Development

64. The training needs analysis recommended in previous reports has not been undertaken as such. The document studied – *Report on Training Needs Analysis* – is a resources assessment for the training department but does not appear to be related to a needs-based analysis of the Brigade's employee group. **Apart from those intentions listed within the Brigade's Service Plan, little evidence was presented which suggested a planned, strategic approach to meeting the majority of staff development needs.**

65. Within the Training Department, a dedicated approach towards maintenance of delivery has caused senior managers to over-focus on delivery to the detriment of forward planning. **The rigid adherence to repetitive training such as Breathing Apparatus annual refreshers is unlikely to merge with an Integrated Personal Development System (IPDS) and the Brigade is encouraged to adopt a more forward-looking approach.** The Training Department is committed to attempting to meet its traditional delivery commitments to wholetime staff members. Whilst commendable in intent, the practical implication is to delay progress in the development of policy and planning. **It is imperative that a corporate assessment is conducted to visibly assess the potential outcomes of this policy.** Competency-based training was adopted from the process used by a neighbouring brigade. This is a vital component of IPDS and the implementation of this system to all staff will be essential.

66. It was noted that critiques are taken from staff undertaking internally-provided developmental training. The absence of a procedure for incorporating this feedback mechanism when reviewing training provision, whilst not diminishing the value of the feedback received, reduces the effectiveness with which the findings are utilised.

67. Whilst there is evidence that inter-station and cross-border exercises do take place, no plan or programme of future events was available. It is important to plan large training undertakings to ensure maximum benefit is derived and **a programme of Brigade operational validation exercises should be developed.**

68. A recent Best Value service review of driver training resulted in the Brigade electing to 'outsource' initial driver training with all other driver development being undertaken by the existing Brigade instructional staff.



69. The support staff training plan studied seems well-developed with costings, justification and prioritisation of the needs presented. **The Brigade may wish to formally adopt a process such as this for all workers.**

70. The 'training notes' presented in the audit listed operational procedures and practices. **The training syllabus for operational watch training reviewed remains a repetitive, routine training regime and should be replaced by a risk-based development scheme as soon as practicable.**

71. The Inspectorate was informed that Fire Safety Officers are required to perform time on-watch each year due to their involvement as emergency cover for operational staff. **The Brigade may wish to review their use for such cover as the ethos moves more towards prevention and away from intervention.**

72. Despite the absence of a clear training policy, strategy or plans, a number of worthwhile activities were noted during the inspection. Some examples include:

- ◆ The extrication group that seeks to enhance road traffic accident rescue skills. The Brigade may wish to consider formally adopting and supporting this team.
- ◆ Senior officer seminars – which are essentially awareness training days for managers.

73. **The Brigade should give urgent consideration to the staffing of its future training needs, particularly when planning human resources for capital developments such as the new training centre.**

Equality, Fairness and Diversity

74. The Brigade's equal opportunities policy is contained within the 'Equal Opportunities Orders'. The ownership by the Fire Board, recommended in 2001, has not been achieved. The position of these policies is that they are those of the employer – the Fire Board – and Board members should be aware of their responsibilities and take ownership. **A valuable change of terminology would be the removal of the term 'Orders' – to help signify the application to all staff. The cultural change associated with such a change may be helpful.**

75. The Equal Opportunities Committee has met regularly and deals with appropriate issues. The minutes are distributed to a narrow group of managers and **the subject could be made more prolific by widely circulating minutes and requests for agenda items.**

76. The Equal Opportunities Orders studied are an extensive set of Equal Opportunities policies and it was informed that, in a forthcoming review, the document *Toward Diversity II for the Scottish Fire Service* would be recognised and the revised fairness and equality guidance adopted.

77. Positive action has been taken in respect of wholetime recruitment. The Brigade has:

- ◆ Attended 'service' career open days.
- ◆ Targeted graduates and ethnic groups.
- ◆ Adopted an innovative advertising campaign.



78. To enable employees to contribute directly to the equality agenda, the Brigade has developed a 'contact officers scheme' which is supported by staff training and an active internal promulgation. No employees have utilised the scheme yet, and the Brigade may wish to establish the reasons for this.

79. The Brigade has been active in forging and strengthening partnerships aimed at increasing diversity, working closely with organisations such as Tayside Police, the local racial equality council and Tayside's joint partnership working group for the Race Relations (Amendment) Act 2000. **Further evidence of the Brigade's proactivity in the area of human resources can be seen by the achievement of the 'disability symbol' user-status**, which commits the Brigade to:

- ◆ interview all applicants with a disability who meet the minimum criteria for a job vacancy and to consider them on their abilities;
- ◆ ask disabled employees at least once a year what it can do to make sure they can develop and use their abilities at work;
- ◆ make every effort when employees become disabled to make sure they stay in employment;
- ◆ take action to ensure that key employees develop the awareness of disability needed to make its commitments; and
- ◆ each year, to review these commitments and what has been achieved, plan ways to improve on them and let all employees know about progress and future plans.

80. It is notable that in the statistical submission for 2001-2002 the Brigade had granted no trade union leave and negligible maternity or paternity leave to staff members. Recognition of representative body commitments and the maternity and paternity rights of workers are an important aspect of modern employment law **and the Brigade may wish to progress policy development in these areas.**

81. The Human Resources Department has conducted a series of 'single status' road shows aimed at increasing staff awareness but awareness among senior management was said to be in need of further development.

82. The Brigade has, in partnership with the Fire Board, produced a race equality scheme as required by the Race Relation (Amendment) Act 2000. This seems to be a broad commitment to the requirements of the Act and will create a significant workload for the Brigade in forthcoming years. **The Brigade may wish to embed the work commitments into future work plans to ensure adequate resourcing.**

Recruitment and Selection

83. The Brigade does not have a clear recruitment policy or strategy for all positions and many of the processes and procedures in place are solely for Wholetime Firefighter selection. The document entitled *Wholetime Recruitment Strategy 2002* is a worthwhile proposal for future changes but is not, in itself, a strategy or policy.

84. It was noted that the Brigade utilises the internal newsletter *Quickfire* for the purposes of raising awareness of forthcoming Wholetime selection processes. Whilst it is important to inform existing staff members of standards and procedures for recruitment,



encouraging their friends and family to apply using an internal publication may act to reduce the effectiveness of the drive towards greater diversity.

85. As with training, responsibility for recruitment of part-time Firefighters rests with operational divisions. **Whilst this seems to be a practical compromise, the guiding and standards-setting policies need to be robust in order to ensure consistency.**

86. The Brigade has no formal policy for promotion. This fact, combined with the demise of the Performance, Development and Review appraisal system leaves a significant 'gap' that will require to be addressed before the Integrated Personal Development System can be properly implemented. **The Brigade may wish to consider the implementation of an assessment centre procedure for all promotional processes.**

Health, Safety and Welfare

87. The reviewed policy has not been, as previously recommended, visibly adopted by the Fire Board. **It is clear that elected members have legal responsibilities under health and safety and it is recommended that this important action is undertaken as soon as practicable.**

88. A number of commitments on Health and Safety in the Service Plan have not been achieved. This was said to be due to the post of Health and Safety Adviser having been vacant. **The Brigade has not acted on previous advice to establish a health and safety committee.** It is strongly recommended that a strategic level Health and Safety committee is created, chaired by a top-tier manager and including all stakeholders.

89. **The Brigade's system for Health and Safety information sharing is effective and reflects suitable prioritisation.** The documents contained within *A Guide for Safe System of Work* are short, bullet-point guidance for a range of operational incidents. As such, these constitute the controlling measures outcome from operational risk assessments and provide useful first aid guidance to crews.

90. In the Brigade's local performance indicators, a commitment is given to achieving far fewer near misses than RIDDOR serious injury events. This approach is not considered likely to produce good results. A commitment to reduce the numbers of accidents, if linked to suitable action plans, is commendable. Near misses are a more qualitative indicator of a Health and Safety management system and any attempt to reduce their incidence is not likely to be productive.

91. The number of events involving damage to Brigade vehicles is a concern – particularly these involving travel to emergency incidents. The Brigade should attempt to identify the root causes and implement controlling measures to reduce the incidence of these events. **It is notable that the safety performance of the Brigade's drivers was not considered during the recent Best Value service review of driver training. This would have valuably informed the review process.**

92. The Brigade intends to replace ball games (a significant on-duty injury activity) with other fitness training as equipment is installed at stations. In the interim, if this activity is identified as a significant risk activity, **the Brigade may wish to consider elimination of risk as a control measure for staff.** The policy of banning such games in particular watches on stations would be more effective if introduced universally.



93. The Health and Safety orders studied are onerous and include lengthy tracts of legislation. **The Brigade may wish to address this during future reviews of the management information system.**

94. It is noted that the Brigade has comparatively high rates of:

- ◆ Ill-health retirement of wholetime staff.
- ◆ Sickness of wholetime staff.

95. The review of occupational health that was conducted culminated in:

- ◆ A new sickness absence management procedure.
- ◆ The appointment of a new medical adviser.
- ◆ A reviewed occupational health policy.

The Brigade is hopeful that the impetus gained from these changes will bring about significant improvements in the short to mid term.



OPERATIONS

Fire service operations represent response and intervention at a very wide range of incidents requiring effective co-ordination, planning, research and development.

Overview

96. Considerable staff changes have occurred in the Operations Department since the last inspection. However, progress continues with operational delivery, liaison with adjoining brigades, provision of operational appliances and equipment and the implementation of a Transport Review. During the inspection a number of areas were seen where improvement was possible, the following being the main points for consideration:

- ◆ Further development of Departmental Plans.
- ◆ A review of the Structure of Operations.
- ◆ Further provision of site specific Tactical Plans.
- ◆ Review to be carried out of Fire Control.
- ◆ Provision of a Procurement Policy.
- ◆ Policy and strategy for the provision of Personal Protective Equipment, Management and Maintenance of Property and Management and Maintenance of Transport.

Policy

97. There is evidence that there is an approach to the planning process but currently this is not of a structured or consistent basis across all departments. The Operations Commanders collectively have input into the planning process and assist in the production of the Brigade Service Plan which, contains a list of actions relating to the Operations Department. **These actions need to be translated into formalised Departmental Plans utilising SMART criteria, where each task is described in detail, financial implications are considered, resources required are identified, other influences are considered and expected outcomes are identified, etc.**

98. As yet, the plans are not communicated to all staff in the Brigade although it was indicated it was the intention to give presentations to staff in the near future. **The Brigade may also wish to consider making the planning process available to staff in an electronic format.**

99. A key element of the planning process is the ability to measure performance and where necessary to provide benchmarks. It is pleasing to note the Brigade's commitment to this process by the positive use of Statutory and Key Performance Indicators, Local Performance Indicators developed by CACFOA and Brigade Local Performance Indicators designed to measure specific functions or areas of Brigade activity. A company has also been utilised to carry out surveys of premises that have been involved in emergency incidents to determine their satisfaction or otherwise with the level of service provided and the performance of crews attending.



Organisation and Structure

100. The management of operations continues to operate within a Divisional Structure with 'A' Division covering Dundee and Angus and 'B' Division covering Perth and Kinross. A review of the structure of Operations Departments was scheduled as an action in the 2002-2003 Service Plans, however, it is understood this objective has been deferred. **It is suggested the Brigade may wish to reconsider this matter and incorporate it within the overall review of resources mentioned earlier in the report. In carrying out the review, workloads and responsibilities should be clearly identified with management functions being devolved to appropriate levels.**

Operational Planning

101. The Brigade, as part of the Tayside RECAP Major Incident Committee, has adequate arrangements in place for the production and revision of major incident and emergency plans. The plans are based upon the centrally issued guidance *Dealing with Disasters Together*. These plans deal principally with the strategic and tactical functions that would require to be implemented to achieve a co-ordinated response to any emergency. Safe Systems of Work and a few Special Incident Plans are also provided.

102. Efficient arrangements are in place for obtaining information required for firefighting and other emergency purposes. This information, in the form of 1(1)(d) cards, is available on appliances. The information is also now being collated in a format that will enable easy transfer to the Vehicle Mounted Data System (VMDS) System. The 1(1)(d) cards are also available at each station for use by visiting crews and relevant information has also been shared with adjacent brigades.

103. At the time of inspection a new format for Operational Tactical Plans was being developed. These Plans will contain information obtained from site specific risk assessments. **In the interests of firefighter safety management should:**

- ◆ **Approve and implement the new format at the earliest opportunity.**
- ◆ **Carry out an operational risk assessment of risks throughout the Brigade area to determine what premises require a Tactical Plan.**
- ◆ **Determine a prioritised workload for provision of the Tactical Plans within definitive timescales.**
- ◆ **Ensure that the plans include measures for damage limitation and minimising the effects of pollution.**
- ◆ **Ensure the information is readily available to personnel responding to incidents either in hard copy or via the VMDS.**

104. Adequate arrangements exist for liaison with relevant agencies and regular exercises, both actual and table-top, are carried out to test the effectiveness of the respective operational plans and procedures.

105. Arrangements are now in place to provide for interoperability and equipment compatibility at cross-border incidents. Liaison meetings and joint exercises are held with neighbouring brigades to test procedures and equipment provision.



106. The Incident Command and Control System has now been in operation for approximately three years. The Brigade is currently reviewing the existing procedures to bring them in line with guidance contained in the 2nd edition of the *Incident Command Manual*. It is anticipated these revised provisions will be fully implemented during the summer of 2003.

Communications and Control

107. Part of the self-assessment evidence provided by the Brigade included a description of how emergency call handling, mobilising and communications is achieved. As part of the service planning process this description could be enhanced to provide a policy and strategy for efficient and effective emergency call handling, mobilising, and radio and telephony communications. **These arrangements along with clear objectives should be defined in the Technical Services Departmental Plan.**

108. Although identified as an action in the 2002-2003 Service Plan very little progress has been made in relation to a Best Value Review of Fire Control. **In the interests of Best Value the Brigade may wish to re-consider the timetable for implementation of the review which should examine:**

- ◆ The implications for the Brigade of the Home Office Study Report – *The Future of Fire Service Control Rooms and Communications in England and Wales*. It would be opportune to consider this report as part of the proposed review to see whether there are any significant issues to be addressed or where any Best Practice guidance could be implemented.
- ◆ Staffing requirements using the 'staffing model' referred to in Dear Firemaster Letter 6/96.
- ◆ The guidance contained in the Fire Service Manual on Fire Service Technology, Equipment and Media.
- ◆ The guidance contained in Dear Firemaster Letter 8/1997 referring to the Fire Research and Development Group Report, National Guidance on Fire Brigade Mobilising Systems – The Control Centre to assist in determining the design and functionality of Fire Control.
- ◆ Ranks and responsibility levels.
- ◆ Training requirements with particular reference to supervisory duties.
- ◆ Discretionary tasks undertaken.

Water Supplies

109. The Brigade has efficient arrangements in place for the provision of water supplies for firefighting purposes and adequate arrangements exist for ensuring that hydrants are tested and examined at an appropriate frequency. Quarterly liaison meetings are held with local water authority managers and, in addition, the Brigade is currently liaising with Scottish Water regarding the provision of a new Service Level Agreement (SLA).



110. The Brigade is in the process of implementing an electronic Hydrant Maintenance System. The System consists of three elements:

- ◆ A Geographical Information System which enables hydrants to be positioned, viewed, plotted, re-located and updated.
- ◆ A Desktop Information System which enables every aspect of hydrant management to be recorded, tracked and reported on.
- ◆ A Field Information System which enables the accurate location of hydrants including their grid reference, address and location details to be captured in the field and used to update the central database.

Procurement

111. The existing arrangements in place for the procurement of supplies and services follows the guidelines contained in the Financial Regulations agreed for Tayside Fire Board however, there is not a clearly defined procedure for the delivery of the procurement function. At the time of inspection the Brigade was reviewing how the procurement function was to be carried out. From the evidence provided it was unclear whether all options had been considered before decisions were taken regarding the proposed arrangements. **In the interests of value for money a review of the procurement function should be carried out that gives consideration to the provision of a procurement policy that identifies the Brigade's specific requirements for the supplies and services necessary to meet its duties and responsibilities and that also demonstrates Best Value. The policy should also provide details of the process for delivering the strategy along with how the policy will be monitored and reviewed. It is suggested the policy should also contain clearly defined risk assessment methodologies. This will ensure that all procurement processes are subject to a risk analysis that involves identification, estimation and evaluation. The policy should also form a strong link to the Service Plan.**

112. A welcome development has been the collaborative arrangements with other brigades regarding research and development, production of specifications and procurement of equipment such as Personal Protective Equipment (PPE), Uniform, Light Portable Pumps and Positive Pressure Ventilation Equipment.

113. The Brigade does not possess sufficient information in an easily retrievable format regarding procurement performance to enable a total analysis to be carried out of the procurement function or full benchmarking to be achieved with other brigades or authorities. Effective mechanisms and accurate management information is essential to enable spend information to be analysed in a way that enables Senior Management to see what is being purchased, from whom and whether the most effective methods are being utilised. Currently an electronic Fleet Management and Stores System is provided for the Workshop and a new Stores Management System is being provided for the Brigade Stores. **The Brigade needs to ensure that these systems are capable of providing for an integrated financial, purchasing and stores information system that will enable:**

- ◆ Initial and whole life costs to be considered.
- ◆ Policies for replacement based on empirical evidence.
- ◆ The true costs of procurement transactions to be determined.
- ◆ The measuring and targeting of year-on-year value for money improvements.



◆ **Benchmarking with other authorities and brigades.**

◆ **Development of performance standards.**

114. The Brigade has negotiated a number of longer-term contracts with suppliers with associated benefits to both parties. A new development for the Brigade has been the Partnering Agreement with a private contractor for the provision of training facilities at a number of sites throughout the Brigade with a total estimated cost of approximately £3.5 million spread over financial years 2002-2003 to 2007-2008. Partnering is an initiative promoted as Best Practice by the Government as a means to improving the delivery, quality and predictability of the service and thereby increasing client and user satisfaction. Partnering differs from the normal contract management process where a contractor is traditionally procured through competitive tender. As partnering is based upon trust and teamwork new procurement methods are required involving evaluation of quality and cost through questionnaire, presentation and interview.

115. Key performance indicators and targets are set for each contract to measure improvements in costs, time, fees and any other benefits which may be produced as a result of the Partnering initiatives. Partners are selected from the client, contractor, sub-contractors and suppliers at an early stage and become members of the Project Team with each having an input into the design, cost, contract conditions and anticipated outcome of the Project. Full participation by the client is expected on the Project Team and includes users. The Brigade is closely monitoring this partnering arrangement but early indications have shown that there are considerable benefits to be gained from such an arrangement particularly in the relationship between all parties and the ability to quickly resolve any difficulties by consensus.

Appliances and Operational Equipment

116. Overall, the Brigade is well provided with operational equipment, which is subject to continual evaluation and review. The establishment of Working Groups caters for the needs and requirements of end-users when the provision of fire appliances or major items of operational equipment design and specifications are being determined.

117. Although considerable progress has been achieved regarding collaboration with other brigades regarding purchase of PPE and Operational Equipment there has been little progress in considering the benefits of joint purchasing arrangements with other brigades or agencies for pumping appliances and special appliances. **The opportunity should therefore be taken to examine possibilities for joint co-operation with other brigades or agencies for such purchases.**

118. The replacement policy for fire appliances continues to be based upon age, however, this policy is currently being reviewed. The fleet is of a very good standard with the average age of pumping appliances at the time of inspection being eight years. With the standard of vehicle now being purchased **it is essential that replacement is based on a dynamic age profile assessment of the vehicle and not a fixed replacement policy.**

119. The criteria and methodology adopted for the replacement and maintenance of PPE appears to be satisfactory, however, **the Brigade may wish to consider the provision of a formalised policy and strategy for PPE which encompasses the requirement, selection, provision, maintenance and replacement.**



Maintenance Arrangements

120. The majority of property maintenance contracts, which are generally of a three-year duration, are placed in conjunction with Tayside Police and take the form of a detailed contract with defined levels of service. The Brigade also has Service Level Agreements (SLAs) in place with Local Authorities for specialist Property Consultancy Services, Ground Maintenance and IT Hardware Support. Condition surveys of all properties has been carried out in conjunction with representatives from Dundee City Council.

121. As part of the Planning Process the Brigade may wish to consider the inclusion of a policy and strategy for the management and maintenance of property within the Technical Services Departmental Plan **which should include:**

- ◆ **A detailed strategy for reactive, preventative and planned maintenance of premises.**
- ◆ **A detailed strategy for new build, refurbishment and minor works projects.**
- ◆ **The provision of key performance indicators and targets to enable the monitoring of service provision.**

122. A Best Value review of the Transport Department is currently being undertaken and is due for completion by March 2004. The Inspectorate welcomes this review and looks forward to outcomes that will maintain and improve the levels of service provided in the most cost-effective manner.

123. A policy and strategy for Transport Maintenance should also be considered for inclusion within the Technical Services Departmental Plan **and should include:**

- ◆ **A detailed strategy and policy for replacement, procurement and disposal of vehicles, plant and equipment.**
- ◆ **A policy for the establishment of realistic productivity levels, regarding times, servicing inspections, minor repairs and sub-contract work.**
- ◆ **A policy on the training requirements for Workshop Staff.**
- ◆ **A policy on management reports required to monitor all Brigade Transport matters.**

124. Adequate facilities exist for the repair and maintenance of the Brigade's fleet. The Workshop operates as a separate cost centre, with maintenance costs being recorded in a 'disaggregated format'. The Brigade now operates a Planned Preventative Maintenance Policy with the Vehicle Inspectorate *Heavy Goods Vehicle Inspection Manual* and CACFOA *Recommended Best Practice for the Maintenance of Fire Service Vehicles*, being utilised as guidance for the maintenance programme.

125. It is pleasing to note the Brigade is collaborating with other brigades in the development of a system for the recording of use, repairs and maintenance of operational equipment from purchase to disposal to fulfil the requirement of Technical Bulletin 1/94 – *Periodic Inspection and Testing of Fire Service Equipment*. Demonstrations have been arranged with various software suppliers through the auspices of the CACFOA (Scotland), Appliances Equipment and Uniform Committee and it is hoped that brigades in Scotland will enter into a partnership arrangement to take this matter forward as a collaborative project.



FIRE SAFETY

Prevention of fires requires a fully integrated programme of positive actions based upon realistic targets. Changes to enforcement regimes and the introduction of wide community safety objectives provide the foundations. Fire investigations and call reduction require similar positive action.

Overview

126. The fire safety arrangements within the Brigade are undergoing some change with the existing commitments between Community Fire Safety and fire safety enforcement being reviewed to achieve a better balance of workload and resources. Optimism was expressed that these changes would add benefit to an already experienced and effectively functioning Department. Planning to reach this desired aim is essential and the following key issues were observed:

- ◆ The outputs required from the Fire Safety Department need better integration with the service planning process to ensure resource allocations and service objectives are deliverable.
- ◆ Assessment of workload commitments, including review of statutory enforcement and workplace risk assessment, is essential.
- ◆ Community Fire Safety practices need evaluation to determine resource commitment.
- ◆ Organisation of data requirements is required.
- ◆ The good practice in community partnership working seen would benefit from greater organisation around corporate and departmental aims.
- ◆ Unwanted call management requires a more systematic approach.

Community Fire Safety

127. The Community Fire Safety (CFS) policy is currently under review with a deadline for a new confirmed policy being in place set for the end of April 2003. The policy review is focused upon achieving a more equitable balance between existing resource usage between safety promotion and enforcement. The objective is to ensure effective utilisation of operational resources devoted to workplace enforcement and community fire safety

128. The existing CFS plan is supervised and pursued by three staff, including one senior officer. There are a number of practical activities underway indicating a clear commitment to putting CFS into practice. **Multi-partnerships are common** and examples were also shown of good media interaction using cartoon characters, in particular 'Ivy the Terrible', a D C Thomson creation. A list of nearly 50 separate activities was offered as evidence in the CFS area and a considerable level of activity planning is also underway for some 21 other discrete activities in this field.

129. The work undertaken has also engaged local authorities, such as Angus Council in the 'Safe as Houses Scheme' and **ample enthusiasm was evident**. It was also reported, that at fire station level, operational personnel were actively suggesting action to tackle particular local hot-spot issues.



130. Statistical data is routinely provided from operational statistics, although **there were some identified difficulties in providing specific research and data needs.**

131. Youth work had likewise been encouraging with the development of young person initiatives designed to help create better citizens and consideration of engagement in both the national Princes Trust Volunteers and Young Firefighters Association.

132. Local action is taken in the event of multiple fire tragedies, such as happened in the Perth area, to help the community generally cope with these distressing events. Action is taken after fires in an organised and sympathetic way to assist householders cope with the trauma in a practical way. Seasonal campaigns are used, including one unique to the area concentrating upon seasonal non-UK fruit pickers who reside on farms at harvest time.

133. There is little doubting the enthused and innovative way CFS is approached and good work has been accomplished to the benefit of many Tayside residents. **What is less than clear is the system of policy generation, management of resources, including budget setting for this activity, and overall integration of the CFS effort.** It is important that CFS planning be addressed in a systematic way to avoid short life projects or unrealistic expectations measurement and sampling of success is also a key feature in this regard.

Fire Safety Practice

134. **The enforcement processes of the Brigade follow older conventions regarding enforcement and are in the process of being amended.** Implementation of a Departmental policy and resource allocation has not commenced and local concern exists on the overall impact this has created. Departmental specialists are judged to be of appropriate numbers and grades for the workload identified in the immediate term, although clearly reappraisal, on a risk basis, is essential.

135. It was advised this action had commenced with a desk-based risk assessment of 11,000 property fires. The area includes two universities and an estimated 500 houses in multiple occupation. The desk-based assessment has, however, already indicated considerable adjustment might be practical with revised inspection criteria releasing specialist resources and operational staff. **It is important, given the overall resource concerns, that the tasks of risk assessment, workload and resource allocation, be completed as soon as possible.**

136. Overall, Departmental targets are within acceptable bounds and it was advised that there are no prohibition notices in force and eight enforcement notices. Guidance followed is drawn directly from national sources and as mentioned levels of competent staffing exist. Operational personnel engaged on enforcement activities are supported by locally-based specialist staff and routine exchanges of information and data occur.

Fire Investigation

137. Fire Safety Officers lead fire investigations with 10 suitably trained staff available. A memorandum of understanding with Tayside Police has been agreed and is awaiting formal ratification. Response to out-of-hours investigations is made only when essential with the preferred method being daytime investigations having sealed the premises after operations. A senior officer is accountable for investigation practice and policy. Little specific progress has been made following the joint Police and Fire Inspectorates study



into fire-raising, although the move should encourage further inter-service working in what is locally perceived as an already good working relationship.

138. Action is taken to work with juvenile fire setters and participation by volunteers is healthy with a recent increase in those operational personnel who wish to join the scheme. Further training is about to commence in-house, both in this volunteer scheme and more generally in the overall area of fire investigation by operational staff at Crew Commander level.

Unwanted Fire Calls

139. **The policy on unwanted calls is as yet undefined**, although the CACFOA Best Practice document is under current consideration. It was advised that the '20 worst offenders' are known, although no evidence was offered in this regard. Practical action, including visits offering advice, is taken to meet with, and help reduce, existing poor-performing premise owners. One hospital was quoted by example, and revised and reduced attendances to minimum national area standards, had been introduced in this case. **Clearly a policy position and data-based system is required if unwanted call management is to be effective.** It was noted that the recent prosecution of an older offender making a malicious call had apparently impacted a reduction in such anti-social behaviour.



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