

**THE SCOTTISH FIRE AND  
RESCUE SERVICE: PROPOSALS  
FOR LEGISLATION**

**CONSULTATION ANALYSIS  
REPORT**

**August 2004**

## **ACKNOWLEDGEMENTS**

We are grateful to the respondents who contributed their views on the legislative proposals for Scotland's fire service.

## EXECUTIVE SUMMARY

1. On 1 October 2003, the Scottish Executive launched its consultation paper on legislative proposals for the Scottish Fire and Rescue Service. The consultation paper built on the issues raised in, and the responses received to, the policy paper *The Scottish Fire Service of the Future* which was published in April 2002. The paper also took account of the report of the Independent Review of the Fire Service - *The Future of the Fire Service: reducing risk, saving lives* (the Bain Report) which was published in December 2002.

2. The number of responses received to *The Scottish Fire and Rescue Service: Proposals for Legislation* was greater than anticipated: more than double that received in response to the policy paper the previous year. Generally the proposals were welcomed, in particular the formalising in statute of the range of activities which the service currently undertakes, reform of fire safety legislation; recovery of costs for misuse of the Service or when used for commerce; and the greater emphasis to be placed on fire prevention and community fire safety. Several local authority respondents recognised the link between the new emphasis on fire prevention/community fire safety and community planning under the Local Government in Scotland Act 2003.

3. Further clarification was sought on a number of issues, including:

- Content of the National Framework and relationship between national priorities and local decision-making.
- Scope of Ministerial powers and a description of the circumstances under which the powers might be used.
- Registration procedures and related responsibilities for the proposed new fire safety regime.
- New powers to investigate the cause of a fire in premises.
- Role and structure of the proposed Common Fire Services Agency.
- The necessity for both accelerated promotion and multi-tier entry.
- The Executive's plans for promoting equal opportunities and diversity within the Service.
- Implications of the proposals on non-uniformed staff and volunteers.

4. Specific areas of concern related to:

### *National Framework and the Use of Ministerial Powers*

4.1 There was no opposition in principle to the concept of a National Framework. However, some concerns were raised about the power of direction which would allow Ministers to intervene if they considered that a fire and rescue authority, or a joint fire and rescue board, was failing, or was likely to fail, to act in accordance with the Framework. Under the proposed Order and following consultation with the fire and rescue authority or joint board, Ministers could require the authority to do something, stop doing something or not to do something in the interests of public safety or efficiency and effectiveness.

4.2 The majority of respondents who expressed a view on the proposed powers of direction, queried the need for these powers in general and indicated that while there may be justification for a power in relation to national resilience issues, it was not considered justified in relation to delivery on national fire priorities.

#### *Structure of Service and Review of Control Rooms*

4.3 The issue of future control room arrangements was seen by some as being clearly linked with the future structure of the Service and the responses to both proposals were cautious. While some respondents considered that the current structures worked well and did not require to be changed, others indicated that any proposals for change required to be fully justified in terms of best value principles, must not result in any diminution of existing services and must be the subject of further consultation.

#### *Common Fire Services Agency*

4.4 The proposal to set up a Common Fire Services Agency as a means of improved service delivery for identified functions, received a mixed response. Some respondents viewed it as a first step towards centralisation of the Fire and Rescue Service. Others recognised the benefits of collaborative working but suggested that collaboration could be achieved through voluntary agreements or a statutory duty to collaborate, rather than the structural change proposed.

5. The Executive has considered the responses very carefully. A number of issues will be the subject of further consultation: such as the detail of the National Framework; the proposal for a Common Fire Services Agency; and the future arrangements for control rooms.

## INTRODUCTION

### Background

6. In April 2002, the first comprehensive development of policy for the Fire Service in many years, was set out in *The Scottish Fire Service of the Future*, a consultation paper which built on the work of the Steering Group which had been established in 1998 to undertake a review of both the police and fire services in Scotland. The paper sought views on a range of issues aimed at improving the Service and making the best use of its resources.

7. The consultation period ended on 30 July 2002 and responses were received from 24 organisations and individuals. In general the responses were very positive with a considerable degree of support for the many recommendations. However, work in taking the proposals forward was disrupted by the fire dispute in 2002-03. Furthermore, the UK Government subsequently set up the Independent Review of the Fire Service chaired by Professor Sir George Bain.

8. The report of the Independent Review: *The Future of the Fire Service: reducing risk, saving lives* which was published in December 2002, and the resolution of the fire dispute in June 2003 put the reform agenda back on track.

9. Following the general election in May 2003, the First Minister announced in the Scottish Parliament the Scottish Executive's legislative programme which included a commitment to publish in the first year of the new Parliamentary session a draft Fire Bill to replace the 1947 Fire Services Act which was over 50 years old.

10. On 1 October 2003, the Scottish Executive launched a consultation paper on the legislative proposals for the Scottish Fire and Rescue Service. 8 categories of interest groups were identified as key stakeholders which formed the basis for the distribution of the consultation paper:

- ❖ Local government
- ❖ Scottish Parliament
- ❖ Government depts/organisations
- ❖ Trade unions and staff associations
- ❖ Professional bodies/trade associations
- ❖ Business sector
- ❖ Equality and diversity groups
- ❖ Others

11. The consultation papers can be accessed on the Scottish Executive website at <http://www.scotland.gov.uk/about/JD/FSEP/00019077/Homepage.aspx>

## Consultation methods

12. As well as being available on the Scottish Executive's website, 151 hard copies of the paper were distributed to key stakeholders including the 32 local authorities, 8 Fire Boards, 8 Firemasters, the Convention of Scottish Local Authorities (COSLA), the Society of Local Authority Chief Executives and Senior Managers (SOLACE), the Chief and Assistant Chief Fire Officers' Association (Scotland) (CACFOA), the Fire Brigades Union (FBU) and 6 other trade unions/staff associations. A copy was sent to each of the 2 Justice Committees, each of the political parties represented in the Scottish Parliament and a further 10 copies were placed in the Scottish Parliament Information Centre.

13. Copies were also sent to the Office of the Deputy Prime Minister (ODPM), the Scotland Office, the National Assembly for Wales, the Northern Ireland Executive, the Health and Safety Executive (HSE), the Scottish Civic Forum, the Scottish Youth Parliament, the Commission for Racial Equality, the Fire Industry Confederation, the Association of Chief Police Officers in Scotland (ACPOS) and the Equal Opportunities Commission. A full list of those consulted is at Annex A.

## Consultation Issues

14. Not all of the recommendations in *The Scottish Fire Service of the Future* required legislative change and work continues with stakeholders in implementing the other changes identified. The consultation paper *The Scottish Fire and Rescue Service: Proposals for Legislation* focussed on the recommendations which required legislative change, together with changes which had arisen from either the December 2002 Independent Review or the June 2003 Fire Service Pay and Conditions Agreement which had implications for legislation. Comments were invited on the 28 key proposals set out in the legislative consultation paper as listed below:

- ❖ **Renaming the Service the Fire and Rescue Service;**
- ❖ **Renaming the Firemaster, the Chief Officer;**
- ❖ **Creation of a new National Framework;**
- ❖ **Ministerial powers;**
- ❖ **Streamlining the current advisory structure;**
- ❖ **Preparation and public consultation on Integrated Risk Management Plans (IRMPs);**
- ❖ **Community fire safety/fire prevention to be a statutory duty;**
- ❖ **Responding to road traffic accidents to be a statutory duty;**
- ❖ **Responding to other serious non-fire emergencies to be a statutory duty;**
- ❖ **Powers for Ministers to prescribe the emergencies to be attended;**

- ❖ **Reforming fire safety legislation and fire and rescue authorities to be given statutory duty as primary enforcing authority;**
- ❖ **Consulting local authorities in respect of enforcement duties;**
- ❖ **Powers for Ministers to issue guidance documents in respect of fire safety legislation;**
- ❖ **New powers to investigate the causes of fire;**
- ❖ **Recovering costs when the Service has been misused or is used for commerce;**
- ❖ **Structure of the Fire and Rescue Service;**
- ❖ **Procurement arrangements;**
- ❖ **Powers for Ministers to procure equipment for the purposes of national and UK resilience;**
- ❖ **Powers for Ministers to impose requirements for use and maintenance of specified equipment or services for core duties;**
- ❖ **Extension of the current provision for schemes of mutual assistance;**
- ❖ **Powers for Ministers to prescribe what provision for equipment fire and rescue authorities should be required to make;**
- ❖ **Establishment of a Common Fire Services Agency;**
- ❖ **Powers for Ministers to implement new control room arrangements;**
- ❖ **Powers for fire and rescue authorities to enter into arrangements with other organisations/individuals to assist with the discharge of their functions;**
- ❖ **Review of funding arrangements;**
- ❖ **Repeal of current discipline regulations;**
- ❖ **Introduction of multi-tier entry and accelerated promotion; and**
- ❖ **Completion of the introduction of the Integrated Personal Development System (IPDS) and the replacement of the current 12 ranks with 7 roles.**

15. Following the launch of the consultation paper by Cathy Jamieson, Minister for Justice, on 1 October 2003, the proposals were debated in the Scottish Parliament on 8 October. In addition, a programme of visits to the 8 fire authorities was arranged during November and December 2003. A presentation on the background to the legislative proposals was provided by Justice Department Bill Team officials and was followed by a question and answer session. A similar presentation was given to stakeholders from the main trade unions, staff associations and professional bodies. Representatives from the Fire

Brigades Union (FBU), Retained Firefighters Union (RFU), Fire Officers' Association (FOA), Institution of Fire Engineers (IFE) and UNISON attended. These presentations provided an early opportunity for stakeholders to clarify their understanding of the proposals, provide their initial views on the consultation paper and raise issues of particular concern. The comments made at these meetings, together with the written responses subsequently received, informed the Executive's decisions with regard to the preparation of the draft Bill.

## **RESPONSES**

### Responses received

16. By the end of the consultation period on 31 December 2003, 49 responses had been received and an extended deadline had been agreed with a number of stakeholders to allow their comments to be submitted for consideration. During January, a further 12 responses were received and 1 in February. A total of 62 responses were received .

17. Responses were received from:

- all 8 fire authorities
- CACFOA
- 14 representatives from 13 local authorities
- COSLA
- SOLACE
- 6 trade unions/staff associations (UNISON, the Association of Principal Fire Officers (APFO) in Scotland, FBU Scotland, FOA, STUC, RFU)
- 2 political parties (Scottish Liberal Democrats and the Scottish Socialist Party)
- the Health and Safety Executive
- the Equal Opportunities Commission
- ACPOS
- Association of British Insurers
- Fire Industry Confederation

### Publication of responses

18. Of the 62 responses received, 54 were non-confidential (a list of these respondents is at Annex B). The text of the non-confidential responses is available from the Scottish Executive Library and on the Scottish Executive website at <http://www.scotland.gov.uk/about/JD/FSEP/00019077/Homepage.aspx> (with minor editing in some cases at the request of the respondent or in the case of potentially defamatory material). 7 respondents have requested that their responses be treated as confidential and the remaining response has been categorised as confidential due to ambiguity.

19. The length of the submissions varied from a single page commenting on a single issue to very lengthy responses providing comments on all the proposals. In addition, some submissions included supplementary material on related issues.

20. Table 1 provides a breakdown of the number of responses received by interest group.

**Table 1: Respondents by interest group**

Interest Group	Number of responses received	As %age of total responses received <sup>1</sup>
Local Government	26	42
Scottish Parliament	3	5
Government Depts/organisations	1	2
Trade unions and staff associations	6	10
Professional bodies/trade associations	6	10
Business sector	10	16
Equality and diversity groups	2	3
Others	8	13

Notes

<sup>1</sup>% does not sum to 100 due to rounding

21. However, it would be inappropriate to attempt to identify either an overall response rate or a rate relating to specific interest groups/types of organisation on the basis of this analysis as participation in consultation exercises is voluntary and respondents are self-selecting. In some cases, composite responses were submitted representing the views of many participants while in others, respondents indicated an agreement with, or repeated, the comments of another respondent e.g. an “umbrella” organisation.

22. Table 2 provides a more detailed analysis of respondents including responses received from respondents who had not been specifically targeted.

**Table 2: Detail of respondents by interest group**

Interest Group	Invited	Responded
<i>Local Government</i>		
Fire authorities	8	8
Fire Brigade representatives	9	2
Local authority representatives	34	14
Individual Councillors	-	1
Police Service	1	1
<i>Scottish Parliament</i>		
Committees	2	0
Political Parties/Independent MSPs	10	2
Individual MSPs	-	1
Scottish Youth Parliament	1	0
<i>Other Government Depts/organisations</i>		
Scotland	5	0
Elsewhere	5	1
<i>Trade unions/staff associations</i>	6	6
<i>Professional bodies/trade associations</i>		
Fire	1	2
Non Fire	2	4
<i>Business sector</i>		
Umbrella organisations	7	1
Individual companies – fire industry	1	6
- non fire industry	-	3
<i>Equality and Diversity Groups</i>	6	2
<i>Others</i>		
Voluntary sector	1	0
Civic groups	1	0
Health sector	1	0
Charities	3	0
Specialist organisations	2	0
Individuals	-	7
Community Planning Partnership	-	1

23. Not surprisingly, the majority of responses were received from the local government sector: the 32 local authorities are the fire authorities for their own areas and there are currently 8 fire authorities (6 joint boards representing 30 local authorities and 2 unitary authorities). A response was submitted by each fire authority. In addition, COSLA, SOLACE and a number of local authorities submitted responses. Councillor Joe Rosiejak submitted a response as Opposition Spokesperson for Community Safety and on behalf of the Fife Liberal Democrat Group. A response was submitted by CACFOA and by a group of employees within Fife Fire and Rescue Service. In addition, ACPOS responded on behalf of its members.

24. Although few written responses were received from interested groups within the Scottish Parliament, the plenary debate on the legislative proposals held on 8 October was well attended and many MSPs participated in the discussion.

25. The Health and Safety Executive was the only UK Government body to provide a written response but communication at both official and Ministerial level has been ongoing with the Scotland Office, the National Assembly for Wales, the Northern Ireland Executive and ODPM. Regular discussions have been held with officials in ODPM and the Northern Ireland Executive on their respective Bills.

26. All 6 of the main unions/staff associations representing fire authority employees (professional and administrative) responded. The professional bodies/trade associations were well represented with twice as many respondents as targeted, submitting comments. Within the business sector, one “umbrella” organisation responded and circulated the consultation paper (and response in due course) to its members. This may account for some of the responses received from individual fire industry companies. Interest in the proposals was also expressed by 3 non-fire industry companies.

27. In addition, for the purposes of the preparation of a Regulatory Impact Assessment in respect of the proposed fire safety legislation, discussions continue with the Federation of Small Businesses, the Scottish Council for Voluntary Organisations, Volunteer Development Scotland and the Office of the Scottish Charity Regulator, about the impact of the proposed reform of the fire safety legislation on micro and small businesses, the voluntary sector and charities.

28. Although faith groups are notable by their absence, the issues of equality and diversity were the subject of comments from respondents in all interest groups as well as written responses received from the Equal Opportunities Commission and OUTRIGHT Scotland.

29. A number of individuals responded and a response was also received from a community planning partnership.

30. Four respondents provided a view on all 28 proposals. The average number of responses received in respect of each of the 28 proposals was 21. More than 30 responses were received in respect of 3 proposals: the structure of the Service; reform of fire safety legislation; and production of, and consultation on, Integrated Risk Management Plans.

Table 3 shows the number of responses received in respect of these 3 proposals, broken down by interest group:

**Table 3: Details of respondents to the 3 proposals in respect of which the most responses were received**

Interest Group	Structure of the Service	Fire Safety legislation	IRMPs
Local Government	19	15	16
Scottish Parliament	2	1	2
Government Depts/organisations		1	
Trade unions and staff associations	4	3	5
Professional bodies/trade associations	1	4	3
Business sector	3	6	5
Equality and diversity groups			
Others	2	2	2

31. The number of responses received was greater than anticipated: more than double the number received on the policy paper *The Scottish Fire Service of the Future*. This indicates that *The Scottish Fire and Rescue Service: Proposals for Legislation* was successful in eliciting the views of a wide range of stakeholders. This was despite some criticism about the layout and tone of the consultation paper. The consultation paper, the Parliamentary debate; “roadshow” presentations to stakeholders and ongoing meetings and discussions, have ensured comprehensive coverage of each sector.

## **FINDINGS**

32. A number of the provisions in the Bill will be re-enactments of the provisions in the Fire Services Act 1947. Generally, the proposals for change were welcomed but some proposals raised concerns among respondents. The issues raised in the responses to each proposal are summarised below.

### Renaming the Service the Fire and Rescue Service

33. This proposal was aimed at better reflecting the wide range of responsibilities beyond firefighting, which the Service carries out. While there was broad support for this proposal, there was sometimes a view that “Fire and Rescue Service” did not adequately reflect the shift in emphasis from intervention to focussing on prevention and community safety measures. Clarification was sought on the role of the Service in relation to other emergency services and the availability of additional funding to support these changes.

34. It was pointed out that 2 fire authorities already use the title “Fire and Rescue Service”.

### Renaming the Firemaster, the Chief Officer

35. The Scottish Executive believed that this proposal better defined the role of the head of each local Fire and Rescue Service and reflected the equal opportunities policy of the Service. While there was some support for the retention of the traditional title of “Firemaster”, the recurrent view was one of support for a title change.

### Creation of a new National Framework

36. The Bain Report was critical of the lack of strategic direction offered to the Service by successive governments. In addition, the current framework within which the Service operates is restrictive, requiring Ministerial approval for the deployment of resources at local level (section 19 of the 1947 Act). The creation of a National Framework would provide the necessary strategic direction but empower fire and rescue authorities/joint boards to make local service delivery decisions at local level.

37. This proposal generated a great deal of interest. There was no opposition in principle with many respondents recognising the need for national priorities but urging the Executive to establish these in consultation with stakeholders. There was some concern that the Framework would lead to a diminution of local control and decision-making. In addition, there was a mixed response to the proposal to abolish section 19 of the 1947 Act as some respondents valued the central approach to decisions about resources, while others considered it a local matter for local decision.

### Powers for Ministers

38. The focus on national priorities would be important, particularly where matters of national resilience or national service delivery were concerned, and it was proposed that the Scottish Ministers should take powers of direction as a means of ensuring that delivery of the National Framework priorities would not be undermined. This proposal was met with some resistance. While there was a near universal understanding of the need for powers in relation to national resilience issues, respondents remained to be convinced of the need for the powers in relation to delivery of national fire priorities.

### Streamlining the current advisory structure

39. There was general consensus that the current advisory structure required to be more dynamic. However, of the models suggested, further information was sought on the proposed membership and remit of the proposed new strategic advisory group with many stakeholders expressing an interest in being represented on the group. Several respondents recommended a single UK advisory group, while others emphasised the need for close links with the newly-established English and Welsh groups.

### Preparation and public consultation on Integrated Risk Management Plans

40. This proposal received the highest number of responses. The greater emphasis on prevention was generally welcomed and the move towards Integrated Risk Management Plans (IRMPs) was recognised as a tool for improving service delivery for all of the core duties. However, views were expressed that there was insufficient evidence that IRMPs would provide an improved service and concern that budgets would influence the level of fire cover; that IRMPs had not been properly piloted; and that no additional funding had been committed to their introduction.

41. It was also pointed out that during the initial years of IRMPs, much of the data required to underpin rigorous and robust risk management planning would not be available or would not be compatible with other data sources. However, it was also stressed that when drawing up IRMPs, it would be important to assess potential hazards rather than being driven by historic events.

### Community fire safety/fire prevention to be a statutory duty

42. This proposal received a high level of responses and was welcomed. A recurrent view was the recognition of the links with duties of Best Value and community planning and the power to advance well-being as set out in the Local Government in Scotland Act 2003. The term “community safety” rather than “community fire safety” was suggested as a better reflection of responsibilities. The availability of resources to support this duty was also a recurring issue.

#### Responding to road traffic accidents to be a statutory duty

43. This proposal was also welcomed in acknowledging that it was one of the functions currently undertaken by the Service. Several respondents suggested that the duty should be expanded to include a role in the prevention of road traffic accidents. In addition, (as with the community fire safety proposal) the issue of the availability of resources to support this duty was raised.

#### Responding to other serious non-fire emergencies to be a statutory duty

44. Generally the proposal to update legislation to reflect current practice was welcomed although a few respondents cautioned that care should be taken to avoid duplicating the activities of other agencies with responsibility for non-fire emergencies. There was a view that specialist training and equipment would be required in order to undertake this duty and clarification was sought on funding.

#### Powers for Ministers to prescribe the emergencies to be attended

45. While some respondents welcomed the prescription of the emergencies to be attended by the Fire and Rescue Service, others had some reservations about the proposal. A few respondents were unconvinced by the need for Ministerial powers in general, and there was a suggestion that this proposal contradicted the Executive's position with regard to local decision-making and local flexibility. Generally, further clarification was sought on the emergencies which would be prescribed and the resources which would be made available.

#### Reforming fire safety legislation and fire and rescue authorities to be given a statutory duty as primary enforcing authority

46. This proposal generated a high level of interest. Rationalisation of fire safety legislation was generally welcomed but a few respondents were of the view that fire certification should be retained. Clarification was sought on proposals for responsibility for fire safety in the workplace; the system which would replace fire certification; and the definitions of "commercial" and "domestic" premises. In addition, there was a recurrent expectation that the Executive would consult further on the detail of the fire safety proposals. There was also a view amongst some respondents that the penalties for breaches of fire safety legislation should be more severe.

#### Consulting local authorities in respect of enforcement duties

47. This proposal generated little interest but from those who did respond, there was universal support.

#### Powers for Ministers to issue guidance documents in respect of fire safety legislation

48. There was a consistent view that guidance documents would be required with many respondents offering suggestions on their format and content and stressing the importance of promoting the new legislation and the availability of guidance, in due course. A few respondents, however, remained unconvinced of the need for Ministerial powers in this area, as well as generally.

### New powers to investigate the causes of fire

49. This proposal introduced new powers which would allow fire investigators to take samples, equipment or articles and carry out any tests necessary and would require fire officers to be able to enter premises as quickly as possible after a serious fire to carry out a detailed investigation. The proposal was welcomed although there was a view that it should be extended to investigations of all fires (as appropriate) and not just those confined to premises. There was a suggestion that the provision of a power of entry should be in relation to all core duties although there would be a need for sensitive management of this power to accord with obligations under human rights law. Clarification was sought on how these new powers would affect the role of the Police Service where they were involved in fire investigations.

### Recovering costs when the Service has been misused or is used for commerce

50. In recognition of the variety of tasks, outwith the core duties, which fire and rescue authorities and joint boards are often requested to provide, this proposal aimed to ensure that the authorities and joint boards could recover the costs associated with these tasks/services if considered appropriate. This proposal generated a high level of interest. The majority of respondents focussed on the misuse of the Service and false alarms, with some supporting the introduction of charging for attendance at false alarms as a result of mechanical failure or poor maintenance of alarms, while others considered that this could have a detrimental effect e.g. the disconnection of alarm systems. There was a view that the Executive should promote independent third party certification schemes as an alternative to charging in relation to false alarms.

51. With regard to charging for the provision of advice which is subsequently used for commercial purposes e.g. private sector fire consultancy work, there was a suggestion that this could have implications for collaboration with organisations/individuals and that charging for the provision of advice could compromise the independence of fire authority enforcement officers.

52. A few respondents expressed concern about fire and rescue authorities “pursuing” revenue and where this might lead e.g. charging insurance companies for attending RTAs. Several respondents suggested that guidance, including clear definitions of “misuse” and “commerce”, should be provided for fire and rescue authorities with regard to charging.

### Structure of the Fire and Rescue Service

53. The structure of the Fire and Rescue Service was last reviewed in 1998 and the decision at that time was that no changes were required. However, it was decided to take the opportunity presented by the updating of the fire service legislation to revisit this issue and comments were therefore invited on the most effective structural arrangements for the Fire and Rescue Service in Scotland. This proposal generated a considerable amount of interest. However, none of the respondents took this opportunity to offer alternatives to the current structure. While a frequently held view was that the current structure worked well and did not require to be changed, the general view was that any proposals for change should be fully justified in terms of best value principles, should not result in any diminution of existing services and should be the subject of further consultation. There was the suggestion that the

reference to structures had been prompted solely as a result of the proposals by ODPM for a reduction in the number of brigades in England and Wales.

#### Procurement arrangements

54. In June 2002, consultants were appointed to look at procurement arrangements in the fire services. The consultants estimated that £3m of efficiency savings could be released by using alternative procurement methods. It was agreed that improvements to performance would be sought through mutual collaboration within the Service.

55. This proposal did not generate a high level of interest. Of those who responded, the general view supported collaboration and pointed out that this already existed within the Service including in respect of procurement initiatives. There was a view that the level of savings identified by the consultants was unrealistic. In addition, a link with the proposed Common Fire Services Agency was recognised.

#### Powers for Ministers to procure equipment for the purposes of national and UK resilience

56. This proposal was aimed at ensuring a consistent and co-ordinated response to a large incident. The existing statutory provisions do not provide for a central body other than Her Majesty's Fire Service Inspectorate for such situations, therefore the co-ordination and organisation of the provision of equipment or the planning of operational procedures and responses to a large incident was problematic. The Executive recognised that there were two issues to be addressed, resources and their deployment in an emergency. Therefore the Executive proposed to procure and own much of the equipment, making it available to the Fire Service as necessary e.g. the Firelink radiocommunications project. There was recurring support for the Executive's commitment to fund the Firelink project. A few respondents referred to the need for compatibility with the Police Service's radiocommunications project, Airwave. While some respondents were generally supportive of Ministerial powers to procure equipment and make it available, others requested clarification of the funding. Several respondents were of the view that procurement by fire and rescue authorities for other resilience priorities should not be compulsory. Her Majesty's Fire Service Inspectorate and the proposed Common Fire Services Agency were both recognised as parties with a key role to play in the procurement and deployment of equipment. There was also a suggestion that it was unclear who would decide on the definition of what was a resilience matter, the guidance which would be made available and procedures for appeal.

57. The view was expressed that this level of central control contradicted the principle of local decision-making. In addition, respondents who had expressed general reservations about the need for Ministers to take powers in relation to earlier proposals, repeated their concerns.

#### Powers for Ministers to impose requirements on authorities to use and maintain any specified equipment or services for all core duties.

58. Similar issues to those in the responses to the previous proposal (paras 56 and 57), were raised: contrary to local decision-making; funding; the role of Her Majesty's Fire Service Inspectorate; right of appeal; potential role for the Common Fire Services Agency; and generally, the need for Ministers to take powers. In addition, a number of other issues were raised: these powers should be used lightly and with the consensus of stakeholders and

following a full risk appraisal through IRM and pilot trials; difficulties in terms of EU procurement legislation; and any such proposals should not be detrimental to existing indigenous business in Scotland. A suggestion that an Incident Control System should be adopted to support the management of all incidents of all types was also put forward.

#### Extension of the current provision for schemes of mutual assistance

59. This proposal generated little response but of those who responded, there was general support for this in principle, with one respondent suggesting international mutual assistance agreements. The issue of funding was raised by a few respondents.

#### Powers for Ministers to prescribe what provision for equipment fire and rescue authorities should be required to make

60. Similar comments to the previous 3 proposals were received (paras 56 to 59): contrary to local decision-making; the role of Her Majesty's Fire Service Inspectorate; funding; the potential role of Common Fire Services Agency; the general need for Ministers to take powers. There was also concern expressed that these proposed powers could be used by the Executive to merge control rooms.

#### Establishment of a Common Fire Services Agency

61. This proposal stemmed from the recognition of the benefits which could arise from a common approach to functions such as funding and administration arrangements of pensions; human resource issues; training; and administrative and financial support functions. The proposal generated a high level of interest. While there was a near universal view that there may be benefits to introducing a common collaborative approach in respect of some functions, clarification was sought on the role, remit and terms of reference of the Agency and evidence of the benefits/savings it might produce. Several respondents suggested responsibilities and roles for the Agency while there was occasionally the view that establishment of a Common Fire Services Agency would be the first step towards centralisation of the Fire and Rescue Service and that it was contrary to the local decision-making principle. A view was expressed that this was a heavy handed approach to nominating a lead fire and rescue authority on purchasing. Further consultation on the detail of the Agency was welcomed.

#### Powers for Ministers to implement new control room arrangements in Scotland

62. This proposal attracted a high level of responses. While a few respondents indicated a willingness to be involved in the review and to wait for the results and recommendations in due course, some expressed the view that the current arrangements were the most effective and that any changes could have a detrimental effect on existing services. Several respondents objected to the statement of intent by Ministers to take powers to implement new arrangements, in advance of the technical review, advising that it suggested that the decision on the future arrangements had already been made.

### Powers for fire and rescue authorities to enter into arrangements with other relevant organisations/individuals to assist with the discharge of their functions

63. At present, fire authorities can make arrangements with each other for the discharge of all, or any, of their functions. This proposal extended the scope for partnership and collaborative working beyond other authorities to any other relevant organisation or individual. The recurrent view was support for this proposal with some respondents suggesting a range of organisations (and resources) for potential partnership with the Service. Several respondents suggested that Ministers should make it a statutory duty for fire and rescue authorities to collaborate. There was some concern that this would lead to privatisation of parts of the Service.

### Review of funding arrangements

64. There was a universal view that funding was a key issue in progressing the modernisation of the Fire and Rescue Service. Several respondents agreed that any changes to the distribution formula should be made on a statutory basis. There was a recurring view that local authorities/COSLA as well as fire and rescue authorities should be consulted as part of the review of the formula. There was also a caution against sudden and substantial re-allocations of resources on the basis of the first IRMPs unless there was confidence in the reliability of the base data used.

### Repeal of the current discipline regulations

65. The Independent Review of the Fire Service concluded that the current disciplinary regulations were not appropriate for a modern workplace. This proposal was therefore aimed at replacing the current regulations with an efficient and modern process which would provide firefighters with a system consistent with the one available to other local government employees.

66. The proposal to improve the current system was universally supported. However, an alternative to repealing the current regulations was suggested viz amend current system to conform with best practice within UK and European employment law. In addition, clarification was sought on a number of issues: would the new regulations apply to all fire and rescue service employees or only firefighters? Would the new disciplinary code be agreed with the unions? How would the level of personal protection afforded by the current system be retained? How would the repeal relate to the procedures being developed within the National Joint Council?

### Introduction of multi-tier entry and accelerated promotion

67. This proposal stemmed from the need to ensure that recruitment processes reflected the ongoing change from ranks to roles and ensured the right people with the right competencies for the right role. While there was general support for the intention to improve diversity, clarification was sought on how this would be achieved with some respondents suggesting ways forward. However, a few opposed the introduction of multi-tier entry and accelerated promotion. There was a view that multi-tier entry and accelerated promotion would contribute little or nothing to the diversity agenda. In addition, there was a view that both systems were not required and the preference was for an accelerated promotion system supported by the Integrated Personal Development System.

Completion of the introduction of the Integrated Personal Development System (IPDS) and the replacement of the current twelve ranks with seven roles

68. This proposal was generally accepted although some concerns were expressed about the costs relating to the implementation of IPDS and the availability of funding to support it. Several respondents stressed the importance of new training arrangements which would encourage diversity within the workforce and recognise the needs of retained and volunteer personnel and minority groups.

**CONCLUSIONS**

69. The broad consensus in respect of the majority of the proposals was support in principle with clarification sought on detail. Further consultation was strongly recommended in a number of areas:

- creation of a National Framework
- fire safety legislation
- any proposed changes to the structure of the Fire and Rescue Service
- establishment of a Common Fire Services Agency
- review of the formula used for the distribution of funds to fire and rescue authorities

## **CONSULTATION EXERCISE: FINAL REPORT**

70. All responses received were considered in the preparation of the draft Bill and helped inform the decisions made with regard to each proposal. These decisions are outlined below:

### Renaming the Service the Fire and Rescue Service

71. There was a consensus that the Service should be renamed to reflect the wider role which has evolved over the years. Through the Fire (Scotland) Bill we therefore intend to change the title ‘fire authority’ to ‘fire and rescue authority’. It will be a matter for individual authorities to decide whether they wish to rename themselves in line with the new definition in the Bill. In Fife the term Fife Fire and Rescue Service has been used for some time and we are also aware that other authorities have already moved to change their name.

### Renaming the Firemaster, the Chief Officer

72. There was a majority view that the term Firemaster should no longer be used as it did not reflect the equal opportunities policy of the Service. We intend to address this through the Bill which will repeal the Fire Services Act 1947. The 1947 Act provided for the term Chief Officer to be replaced by Firemaster for Scotland.

### Creation of a National Framework

73. We had recommended the creation of a National Framework to provide the necessary strategic direction for the Service whilst leaving fire and rescue authorities/joint boards free to make local service delivery decisions at a local level. In the main respondents agreed with this proposal. The Fire (Scotland) Bill will therefore provide for a framework and, to address any concerns about parliamentary scrutiny of the framework, it will be brought into effect by the Scottish Ministers by an order in the Scottish Parliament.

74. The Scottish Executive intends to work in partnership with stakeholders to produce a draft framework. The draft framework will be subject to a full consultation process.

### Ministerial powers

75. The proposal to take powers of direction as a means of ensuring the delivery of the National Framework priorities generated some concerns from respondents that they had the potential for undermining local decision-making. However the Framework is intended to cover both national and local issues and whilst on most issues it will be a matter for fire and rescue authorities/joint boards to decide how to meet the objectives of the Framework in line with local needs, it is reasonable that Ministers should have these powers of last resort to intervene where they consider an authority is failing, or is likely to fail, to meet the public service requirements set out in the Framework.

76. The Fire (Scotland) Bill therefore provides for the necessary Ministerial powers to intervene. The power is intended to be exercisable by order with a requirement to consult.

### Streamlining the current advisory structure

77. The proposal to replace the existing advisory structure was welcomed. Further work and consultation needs to take place with stakeholders to agree a new structure which addresses the concerns raised about the current Scottish Central Fire Brigades Advisory Council (SCFBAC). As stated in the consultation report, the replacement advisory structure will not be established on a statutory basis and the Fire (Scotland) Bill will therefore make provision only for the abolition of the SCFBAC.

### Integrated Risk Management Plans (IRMPs)

78. The Integrated Risk Management Plan approach is intended to replace the existing Standards of Fire Cover. The latter were not established on a statutory basis and neither is it intended that IRMPs will be established on a statutory basis. Much work has already been carried out by Her Majesty's Fire Service Inspectorate in Scotland by way of guidance on planning for the introduction of IRMPs. It is intended that this work and support will continue with the new IRMPs being in place by 1 April 2005.

### Community fire safety to be a statutory duty

79. This proposal was widely welcomed and will be taken forward through the Fire (Scotland) Bill which provides that making provision for the purpose of promoting fire safety will be a principal statutory function.

### Responding to road traffic accidents to be a statutory duty

80. This proposal was widely welcomed and will be taken forward through the Fire (Scotland) Bill which provides that rescuing persons involved in road traffic accidents, and dealing with their aftermath, will be a principal statutory function.

### Responding to other serious non-fire emergencies to be a statutory duty

81. This proposal was widely welcomed with some respondents urging that care should be taken to avoid duplicating the provision of other agencies and organisations with responsibility for non-fire emergencies e.g. Mountain Rescue Teams. We will take this forward through the Fire (Scotland) Bill which will make provision that Scottish Ministers may by order confer additional functions relating to emergencies as principal statutory functions on fire and rescue authorities. The method of conferral by order will mean that any functions included will be subject to consultation and parliamentary scrutiny. The order process also ensures that there is a flexible approach which will enable the Fire and Rescue Service to adapt to changing events.

### Powers for Ministers to prescribe the emergencies to be attended

82. This proposal had a mixed response and respondents sought clarification about what kind of emergencies would be prescribed and also what resources would be made available. However the potential is always there for an emergency to occur which nobody has foreseen and for which authorities have been unable to plan. In such cases there would be no time to make the necessary 'additional function order' and it may also be the case that a level of central co-ordination is required. The Fire (Scotland) Bill will therefore make provision for

Scottish Ministers to have a power to direct a fire and rescue authority or joint board as to how they should respond to a particular fire or other emergency. This is intended to be a power of last resort.

#### Reforming fire safety legislation and fire and rescue authorities to be given a statutory duty as the primary enforcing authority

83. Again whilst this proposal was generally welcomed a number of respondents felt that they would like to see more of the detail. Others suggested that the penalties for breaches of fire safety legislation should be more severe.

84. We intend to take this proposal forward through the Fire (Scotland) Bill, which provides for a new fire safety regime based on the principles of risk assessment by those with responsibility for the premises. The Bill also makes provision for Scottish Ministers to make regulations about risk assessments and fire safety. These regulations (and associated guidance) will contain much of the detail of the new regime and it is intended to further consult with stakeholders on a draft set of the regulations. The Fire (Scotland) Bill will also make fire and rescue authorities/joint boards the main enforcing authority for the new fire safety regime. To reflect the views expressed about penalties the Fire (Scotland) Bill also provides for increased penalties for a number of the offences related to fire safety.

#### Consulting local authorities in respect of enforcement duties

85. This proposal was warmly welcomed. It is our intention to consult further with stakeholders not only in respect of the fire safety regulations resulting from the Fire (Scotland) Bill but also to engage with stakeholders to seek their input into the drafting of the necessary guidance which will be issued to support and complement the new fire safety regime.

#### Power for Ministers to issue guidance documents in respect of fire safety legislation

86. Whilst there was a consistent view that guidance documents would be required, respondents were generally not convinced that there was a need for Ministerial powers here. As indicated above it is our intention to produce guidance. On reflection we agree with respondents that we do not need to provide Scottish Ministers with powers to do this and the Fire (Scotland) Bill will therefore not make any provision in this area.

#### New powers to investigate the causes of fire

87. This proposal was welcomed and indeed a number of respondents would have liked to have seen the powers extended to all fires. There was also a suggestion that the provision of a power of entry should be in relation to all core duties and not just investigation.

88. The Service has undertaken the investigation of fires for many years. On those occasions when the cause of a fire could not be proved during the course of the firefighting operations, an authorised officer may have had to return to the premises to carry out further investigation work, but there has been no statutory power to facilitate this. The Fire (Scotland) Bill therefore provides statutory powers for authorised officers of the fire and rescue authority/joint board to enter premises where a fire has occurred in order to investigate the cause and progression of the fire including the taking of samples, equipment or articles

and carry out any tests necessary. The power provided would enable authorised officers to enter premises, including domestic premises, at any reasonable time.

89. Investigating the cause or spread of fire is important because it identifies problems as they arise and provides essential information to help develop both community fire safety education programmes and fire safety measures generally. In arriving at these provisions account has had to be taken of the individual's rights to privacy and respect for their home. It is the Scottish Executive's position that the benefits of fire investigation are very much in the public interest.

#### Recovering costs when the Service has been misused or is used for commerce.

90. This proposal generated a high level of interest and the range of responses offered highlighted some of the complexities of this area. We are clear that the first priority of the Fire and Rescue Service must be to protect life from fire and other emergencies and property from fire.

91. The Fire (Scotland) Bill will make provision for the Scottish Ministers to specify by order services for which fire and rescue authorities/joint boards can recover their costs. The first order will specify those services for which a charge is currently levied. Additional services will be added in the light of further review, analysis and consultation. This approach recognises the complexities of the issues as highlighted at paragraphs 50 to 52 above. We will, however, consult further on these provisions.

#### Structure of the Fire and Rescue Service

92. The majority of respondents expressed the view that the existing structure functioned well and that change needed to be fully justified on the basis of best value. The Scottish Executive intends to keep the matter under review to ensure that the existing structure remains the optimum structure for the fire and rescue service as it continues to go through a period of evolution. The Bill therefore more or less replicates the existing facility whereby the fire authorities may enter into a scheme administered by a joint board covering a number of fire authority areas. The onus has been shifted to Scottish Ministers to make such schemes. Decisions have to be reached on the basis of improving economy, efficiency and effectiveness. Schemes would be made by order and are therefore subject to parliamentary scrutiny. Scottish Ministers must also carry out a consultation before making an order. The Scottish Executive will replicate the existing schemes under the Bill.

#### Procurement arrangements

93. The benefits of collaboration were recognised by respondents. This proposal will continue to be kept under review and would sensibly link with any wider consideration of common fire services. Stakeholder involvement in the process will be the key.

Powers for Ministers to procure equipment for the purposes of national and UK resilience  
Powers for Ministers to impose requirements for use and maintenance of specified equipment or services for core duties

Powers for Ministers to prescribe what provision for equipment Fire and Rescue Authorities should be required to make

94. The Fire (Scotland) Bill makes provision for these powers. Scottish Ministers will have the power to require fire and rescue authority or joint boards to use and maintain specified equipment, or to use specified services. They will also have the power to provide and maintain services, equipment and facilities to assist the fire and rescue authorities/joint boards in carrying out their duties effectively. For example the powers will be used to provide any New Dimension equipment or the new national radio system – Firelink. The power to require fire and rescue authorities/joint boards to use services or equipment provided in this way would only be triggered if the refusal of one or more authorities to use the equipment provided presented a threat to the resilience of the fire and rescue service as a whole. Concerns expressed by some respondents about the need for these powers have had to be weighed against this need to be able to ensure resilience.

Extension of the current provision for schemes of mutual assistance

Powers for Fire and Rescue Authorities to enter into arrangements with other organisations/individuals to assist with the discharge of their functions

95. These proposals were widely supported. The Fire (Scotland) Bill re-enacts these provisions which were provided for in the Fire Services Act 1947 but extends them so that a fire and rescue authority or joint board can discharge all or part of their principal statutory functions to others as appropriate to the power. An example would be where a fire and rescue authority/joint board might decide to contract with an education authority to promote fire safety within its schools. In recognition of the particular expertise involved in firefighting a fire and rescue authority/joint board remains unable to discharge their ‘firefighting’ function to anyone who does not employ firefighters.

Establishment of a Common Fire Services Agency

96. Whilst the benefits of a common collaborative approach in respect of some functions was generally recognised, respondents sought clarification about the role and remit of a Common Fire Services Agency and also evidence of the benefits and savings this approach may produce. In recognition of these views the Fire (Scotland) Bill will not be used to establish an agency which could discharge functions on behalf of the fire and rescue authorities/joint boards. Rather Scottish Ministers will use powers in the Bill to form a body to further examine this important issue with a view to agreeing a way forward. It is intended that the body will have stakeholder representation and that the project will be developed on a partnership basis. Powers in the Bill allow the Scottish Ministers to establish and maintain any organisations they ‘consider appropriate for promoting the economy, efficiency and effectiveness of fire and rescue authorities’.

Powers for Ministers to implement new control room arrangements

97. The technical review into the control room arrangements for Scotland was undertaken by consultants Mott MacDonald, and a Report has now been published. The review concludes that there would be benefits in reducing the current number of control rooms from

eight to one, two or three. The Scottish Executive is consulting stakeholders on the findings and recommendations of the review. The consultation period is due to end on 31 August 2004. The Scottish Ministers will take no final decisions on the report until responses to the consultation have been considered. As indicated above, the Fire (Scotland) Bill does contain powers about the use of equipment and facilities which would be used to ensure resilience and public safety in Scotland.

#### Funding arrangements

98. The Scottish Executive has established a Fire Grant Aided Expenditure (GAE) Working Group, with stakeholder representation, to consider whether a new distribution formula would be appropriate. The issue is a complex one and the Working Group are due to report their preliminary findings to Ministers later this year, with a full report to follow at a later date. It is unlikely that any changes will be required to be made on a statutory basis through the Fire (Scotland) Bill and accordingly no provisions have been made. The existing distribution formula has not been made in statute: it is the subject of consultation with COSLA.

#### Repeal of current discipline regulations

99. This proposal was universally supported and consequently the current regulations will be repealed through the Fire (Scotland) Bill. Replacement arrangements will be taken forward by the Scottish Executive as part of the National Framework, taking account of any proposed UK legislation in this area.

#### Introduction of multi-tier entry and accelerated promotion

#### Completion of the introduction of the Integrated Personal Development System (IPDS) and the replacement of current 12 ranks with 7 roles.

100. The Scottish Ministers have decided to introduce multi-tier entry and accelerated promotion by revising the current regulations governing appointment and promotion, made under the 1947 Act, and will be consulting the Scottish Central Fire Brigades Advisory Council on the new draft regulations. The new regulations will also place the seven IPDS roles on a statutory basis.

## **CONCLUSION**

101. The Fire (Scotland) Bill was introduced in the Scottish Parliament in June 2004 and is available on the Scottish Parliament's website at <http://www.scottish.parliament.uk/bills/index.htm>. Following its introduction, the Bill has been allocated to the Justice 2 Committee for scrutiny during its various stages.

## SCOTTISH FIRE AND RESCUE SERVICE: PROPOSALS FOR LEGISLATION

## LIST OF CONSULTEES

<b>Organisation</b>	<b>No.</b>	<b>Qty</b>
<u>Local Government</u>		
Conveners of Fire Boards	8	1
Firemasters	8	5
CACFOA	1	1
Councils (Chief Executive)	32	1
COSLA	1	1
SOLACE	1	1
ACPOS	1	1
<u>Scottish Parliament</u>		
Justice 1 Committee	1	1
Justice 2 Committee	1	1
Scottish Labour Party	1	1
Scottish Conservative Party	1	1
Scottish Green Party	1	1
Scottish Nationalist Party	1	1
Scottish Liberal Democrats	1	1
Scottish Socialist Party	1	1
Scottish Senior Citizens Unity Party	1	1
Dennis Canavan MSP	1	1
Ms Jean Turner MSP	1	1
Ms Margo MacDonald MSP	1	1
Scottish Youth Parliament	1	1
[Scottish Parliament Information Centre	1	10]
<u>Other Government Depts/Organisations</u>		
Scottish Fire Services College	1	1
Health & Safety Executive	1	1
SEPA	1	1

<b>Organisation</b>	<b>No.</b>	<b>Qty</b>
Maritime and Coastguard Agency	1	1
Scotland Office	1	1
National Assembly for Wales	1	1
Northern Ireland Executive	1	1
ODPM	1	1
Audit Scotland	1	1
Cairngorms National Park Authority	1	1
<u>Trade Unions/Staff Associations</u>		
FBU	1	1
STUC	1	1
RFU	1	1
Fire Officers Association	1	1
Association of Principal Fire Officers	1	1
UNISON	1	1
<u>Professional Bodies/Trade Associations</u>		
Institution of Fire Engineers	1	1
Association of British Insurers	1	1
Emergency Planning Society	1	1
<u>Equality and Diversity</u>		
Positive Action in Housing	1	1
Commission for Racial Equality	1	1
Equal Opportunities Commission	1	1
Action of Churches in Scotland	1	1
Scottish Interfaith Council	1	1
Scottish Human Rights Centre	1	1
<u>Business Sector</u>		
CBI	1	1
Federation of Small Businesses	1	1
Forum of Private Businesses	1	1
Institute of Directors	1	1
Scottish Chambers of Commerce	1	1
Scottish Retail Consortium	1	1
Scottish Food and Drink Federation	1	1
Fire Industry Confederation	1	1

<b>Organisation</b>	<b>No.</b>	<b>Qty</b>
<u>Others</u>		
SCVO	1	1
Scottish Civic Forum	1	1
Scottish Ambulance Service	1	1
Fire Protection Association	1	1
Fire Service Research and Training Trust	1	1
Fire Services National Benevolent Fund	1	1
Building Research Establishment	1	1
Arson Prevention Bureau	1	1
<b>TOTAL</b>		<b>151</b>

## LIST OF RESPONDENTS

### Local Government

- ❖ ACPOS
- ❖ Councillor Joe Rosiejak
- ❖ Grampian Fire Board
- ❖ North Lanarkshire Council
- ❖ West Dunbartonshire Council
- ❖ Orkney Islands Council
- ❖ East Ayrshire Council
- ❖ Aberdeen City Council
- ❖ Stirling Council
- ❖ CACFOA (Scotland)
- ❖ Strathclyde Fire Board
- ❖ South Lanarkshire Council
- ❖ Highland and Islands Fire Board
- ❖ Lothian and Borders Fire Board
- ❖ Fife Council
- ❖ Dumfries and Galloway Fire Authority
- ❖ SOLACE
- ❖ Clackmannanshire Council
- ❖ Fife Fire and Rescue Service Control Centre
- ❖ Central Scotland Fire Board
- ❖ Dundee City Council
- ❖ Tayside Fire Board
- ❖ West Lothian Council

### Scottish Parliament

- ❖ Scottish Liberal Democrats
- ❖ SSP
- ❖ 1 MSP (name withheld at request of respondent)

### Other Government Depts/Organisations

- ❖ Health and Safety Executive

### Trade Unions and Staff Associations

- ❖ UNISON
- ❖ APFO in Scotland
- ❖ FBU Scotland
- ❖ FOA
- ❖ STUC
- ❖ RFU

### Professional Bodies/Trade Associations

- ❖ Forestry and Timber Association
- ❖ World Fire Statistics Centre
- ❖ Association of British Insurers
- ❖ RICS in Scotland Building Control Forum

- ❖ Scottish Branch of the IFE
- ❖ Scottish Association of Building Standards Managers

#### Equality and Diversity

- ❖ OURTRIGHT Scotland
- ❖ Equal Opportunities Commission

#### Business Sector

- ❖ Mason Communications Ltd
- ❖ Avecia
- ❖ Firebreak Services Ltd
- ❖ Fire Industry Confederation
- ❖ British Automatic Sprinkler Association Ltd
- ❖ Chubb Fire Scotland
- ❖ Gent Ltd
- ❖ Kidde plc

#### Others

- ❖ Lord Burton
- ❖ Mr D V Philp
- ❖ Mr IMC Scade
- ❖ Dumfries and Galloway Community Planning Joint Board
- ❖ Mr J Leith

In addition, 8 responses are being treated as confidential.