

Additional Report on the Consultation by Warwickshire County Council entitled “Fire and Rescue Improvement Consultation” compared with the Det Norske Veritas “Risk Review of Improvement Objectives” which informed it

The report is a content comparison compiled at the request of residents across Warwickshire. This report is a comparison of the public Consultation document with the recently released (12 October 2009) Management Summary from the Det Norske Veritas Risk Review and the subsequently released full document.

Comparison of the public and management documents

The documents provided to the public and the confidential Risk Review are sufficiently divergent to substantially call the integrity of the public documents into question. The examples given below are illustrative, but not exhaustive.

1 Selective release of numbers

The consultation document suggests that an increase of 25 full-time firefighters is being offered. However, it does not state at any point that the overall number of firefighters is reduced by 58, as is stated in the Management Summary.

2 Withholding of disadvantages

Both the management report and the full report detail a number of actual and potential disadvantages to the proposals. The management report states on objective 1 “Reduction in cost outweighs the risk”. However, the public documents present the plans as without disadvantages.

3 Failure to disclose reasoning

The Atherstone fire is referenced three times in the management documents, as follows: “Appropriate response to Atherstone accident”

“...less vulnerable to accidents in them, such as at Atherstone.”

“...implication that lessons of Atherstone have not been learned.”

Elsewhere, the need to increase efficiency and reduce costs is repeatedly cited. A stated objective within the management documents is “to identify stations and resources that are not required”.

This reasoning is, however, not revealed in the public documents.

4 Failure to disclose costings

The report repeatedly states values for cost savings and investments, along with projections about future cost savings. These are excluded from the consultation document, and no indicative figures are given to replace them.

5 Failure to disclose increase in risk

The main purpose of the Risk Review is the quantification of risk. The management summary on objective 1 states: “Reduction in cost outweighs the risk”, and values the increase in risk at £64,000 per year.

The full document (3 Resources) lists eight risks if the plan is implemented, which together are valued at £720,000 increased “fire damage and fatalities”, but the writers point out that even this valuation is uncertain.

The public documents are presented without any indication of increase in risk to life or property.

6 Failure to disclose assumptions

The full Risk Review repeatedly points out that it is working on untested assumptions. This is particularly telling in section 2 Duty Roster, Quantification of Risks: “There is no data on the effect of training on fire risks, so the following is based on illustrative assumptions, which suggest a 12% reduction in risk when whole-time firefighters are used...”

The public documents at no point give the impression that the assumptions are untested.

7 Failure to disclose haste

The full Risk Review states (1.4 General Approach): “the study has been constrained to deliver results in approximately 3 weeks, and hence relies on readily available data, previous analyses and simplifying assumptions.”

This requirement to act quickly is not disclosed in the public documents. It is at no point made clear why it is essential to move with such haste.

8 Failure to disclose lack of evidence for over-optimistic predictions

The close of section 4, Resources, in the full document notes that Warwickshire already has the highest number of incidents per appliance for county fire-services. It states that the planned rise to 372 incidents per station-year would also be 24% higher than the highest other county fire service experience. The report suggests that, since metropolitan services achieve such results, the plan is “not unrealistic”.

The public document does not record this unfavourable comparison with other county services, or specify the reasoning.

9 Failure to disclose uncertainty

The management summary concludes:

“This work is uncertain because it has been completed over a short timescale, and uses preliminary assumptions that have had only preliminary validation by WFRS. It also makes use of national calculations of the effects of response time, whereas local models would be preferable. At present it is based on WFRS fire statistics from 2006/07, fire damage costs from 2004. Updates to use more recent data would be expected to have a small impact because fire frequencies have reduced but costs have increased.”

However, any trace of uncertainty is excluded from the consultation documents.

10 Failure to disclose the incompleteness of the preparations

The full risk report recommends (11.4, Recommendations)

“A more comprehensive study of the risks associated with fire and rescue in Warwickshire would provide the basis for a fully risk-based set of improvements, which might be able to increase the benefits from the current objectives.”

However, the public document is presented as a fully explored and ready plan.

Use of English

Unusually, the clarity of English used in the Risk Review compiled by a Norwegian company and presented for managers is substantially better than that in the public document. The Gunning Fog index for the initial paragraphs of the management summary is 13.59, compared to 17.7 for a comparable section of the consultation document. As a comparison, The Times and the Guardian have a typical index of 14, whereas only

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academic papers would normally have an index of 15 or above. The score for the full document, excluding the management summary, is just 12. In other words, the document presented to the public for consultation is substantially more difficult to understand than the report presented to senior managers by a Norwegian company.

Conclusions

Government code of practice

The Government's code of practice on consultations, available online at <http://www.berr.gov.uk/files/file47158.pdf>, sets out seven criteria, which include:

“Formal consultation should take place at a stage when there is scope to influence the policy outcome.” This overall criterion is supported by “It is important that consultation takes place when the Government is ready to put sufficient information into the public domain to enable an effective and informed dialogue on the issues being consulted on.”

“Consultation documents should be clear about the consultation process, what is being proposed, the scope to influence and the expected costs and benefits of the proposals.” This is supported by: “Estimates of the costs and benefits of the policy options under consideration should normally form an integral part of consultation exercises...”

“Consultation exercises should be designed to be accessible to, and clearly targeted at, those people the exercise is intended to reach.” This is supported by: “As far as is possible, consultation documents should be easy to understand: they should be concise, self-contained and free of jargon.”

“Officials running consultations should seek guidance in how to run an effective consultation exercise and share what they have learned from the experience.”

The code is not mandatory for local authorities and related services, but it is recommended, and forms the basis of the nationally accepted standard on consultations.

Warwickshire Compact

Additionally, public sector bodies in Warwickshire agree to be bound by the Warwickshire Compact, which is available online: http://www.warwickshirecompact.org.uk/uploads/2/9/2/7/2927811/compact_codes_2005.pdf

The consultation code within the Warwickshire compact includes the following:

“Public Agencies will seek to ensure that:

“... Consultation documents are concise, clearly laid out and written in simple and appropriate language, avoiding jargon, so they will be understood by the intended audience.

“...The subject and framework for consultation is made clear from the start, together with any limitations that may apply, particularly where some decisions have already been taken or why a particular option is favoured.

“...Where appropriate, an explanation of who is likely to be affected and how, including an assessment covering the likely effect of the proposals on voluntary and community organisations.”

The consultation

Based solely on a comparison between the contents of the public consultation documents and the management summary and full report, it is clear that the consultation process falls

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substantially below the level which is considered acceptable both nationally and within Warwickshire. It is hard to come to any conclusion other than that there has been a deliberate attempt to suppress the uncertainties, disadvantages and risks associated with the proposals. With this in mind, serious people might have the gravest possible concerns about the integrity of the process, especially given the haste with which it is being conducted.

Given that this material is now in the public domain, it must be accepted that the credibility of this consultation process is fatally damaged.

Without taking other considerations into account except those which can be derived from analysing the documents, a reasonable course of action would be:

- 1 Immediate suspension of the consultation process
- 2 Completion of a full risk report in adequate timescales, as recommended in the Det Norske Veritas report
- 3 Revision of the proposals to take account of issues already presented in the existing report, issues that come to light in the full risk report, and issues that have come to light during the aborted consultation process
- 4 A new consultation process, with entirely new documents which are independently pre-vetted for compliance with national and county codes of practice.

Additionally, since the integrity of the current process is so much in question, those running the consultation might consider if an instrument of direct democracy, such as a county referendum, might be employed on a single definitive question at the close of the final process.

Coda

Det Norske Veritas loosely translates as “The Norwegian Truth”.

Declarations of interest:

This analysis was compiled by Martin Turner, 24 Cleeve Road, Marlcliff, B50 4NR. Martin Turner is a prospective parliamentary candidate for the Liberal Democrat party.

Statement of competence:

Martin Turner is a full member of the Chartered Institute of Public Relations.