

**Wendy Williams CBE**

Her Majesty's Inspector of Constabulary  
Her Majesty's Inspector of Fire & Rescue Services

Mr Wayne Bowcock  
Chief Fire Officer  
Gloucestershire Fire and Rescue Service

Councillor David Norman MBE  
Cabinet Member for Public Protection, Parking and Libraries  
Gloucestershire County Council

19 March 2021

Dear Mr Bowcock and Councillor Norman,

**GLOUCESTERSHIRE FIRE AND RESCUE SERVICE CAUSES OF CONCERN REVISIT**

**Background**

We made our second revisit to Gloucestershire Fire and Rescue Service (FRS) between 22 and 26 February 2021. The revisit was carried out remotely because of COVID-19 restrictions. This letter gives an update on our findings about progress against your action plan.

2. The focus of the revisit was the causes of concern we established after our inspection in the week of 3 June 2019. These were that:

(a) Gloucestershire FRS doesn't have a clear protection strategy that describes how it will manage its statutory responsibilities using its risk-based inspection programme (RBIP) to identify highest-risk premises. The service has difficulty in maintaining and interpreting its data and can't carry out the number of audits of high-risk premises that it commits to as part of its RBIP.

(b) Gloucestershire FRS values are tarnished and aren't credible with staff. The service needs to introduce its new values and service structure to allow staff and managers to understand the priorities for the future.

3. While this revisit considered progress against both causes of concern, our first revisit to the service in November 2019 only considered progress against the first cause of concern, relating to protection. We were encouraged by the progress we saw in 2019. This included having suitable governance arrangements in place to monitor progress against the service's action plan.

4. During this second revisit, we looked at both causes of concern. We interviewed over 20 staff across the service. This included members of the service's senior leadership team, the council's cabinet lead, staff responsible for implementing the service's action plan, staff in the service's protection team, and staff equality, diversity and inclusion representatives.

### **Action plan**

5. The service has a plan for each cause of concern – the protection action plan and the culture action plan. Both plans have specific action owners, although overall ownership of the plans differs.

6. The protection action plan has a senior responsible owner. The culture action plan is owned by the service's senior leadership team but doesn't have a senior responsible owner with day-to-day responsibility for implementing it.

7. The plans don't follow a consistent format. For example, all tasks have clear start and end dates in the protection plan but not in the culture plan. This will make it difficult for the service to effectively monitor progress against it.

### **Governance**

8. We found that the internal governance arrangements in place haven't developed as we would have expected since our last revisit.

9. The monitoring arrangements in place are inconsistent and not robust. The service has separate action plans for each cause of concern. We found inconsistencies in how each plan is monitored and scrutinised. And we don't think the service's senior leadership team or the cabinet lead get the information they need to properly oversee and scrutinise progress.

10. The service has recognised the limitations of its monitoring arrangements. A project management office has been created to co-ordinate and monitor service improvement projects. Oversight and scrutiny are provided by the portfolio management board (PMB), which was established in September 2020.

11. The action plan relating to the cause of concern on culture will be monitored through the PMB from now on. The service couldn't explain how it will monitor its protection action plan in the future.

### **Progress against causes of concern**

#### *Protection*

12. When we first inspected the service, we had several concerns about it failing to fulfil its protection requirements.

13. In May 2020, the service put a new protection policy in place. This gives a clear focus for the service's protection work. The policy outlines the service's RBIP and newly defines high-risk buildings. This new definition, developed with the support of Oxfordshire and Warwickshire FRSs, is based on national and local risk factors. The protection staff we interviewed during this revisit understand the definition and feel it is right for Gloucestershire.

14. In November 2019, we found that the service had designed a new structure for its protection department. It had also had extra funding from Gloucestershire County Council to increase its number of protection staff and was about to begin recruitment.

15. We were pleased to find that, since our last revisit, progress has continued. The number of protection staff has increased from 3 to 11. Capability should continue to grow as new staff complete their development. But the service needs to make sure that all members of the team are clear about their roles and line management responsibilities, so that staff are fully supported as they develop into their new roles and team.

16. The service has taken steps to improve its understanding, and the quality, of its data on buildings. The accuracy of building information reports is now checked by a senior manager before being used or sent to external organisations. The service should document this assurance process to make sure that it is accessible and can be applied consistently by members of the protection team.

17. The service has set a target of inspecting 852 high-risk buildings per year. At the time of our revisit, it was unlikely to meet this target for the current year. The COVID-19 pandemic has restricted its ability to visit and inspect buildings. This meant that it had inspected only 364 (43 percent) buildings in the first 9 months of 2020/21. It appears unlikely that it will reach its target in the remaining 3 months. It needs to take steps to meet its targets, and to allocate work proportionally to staff according to their skills and experience. This is especially important when new staff are being trained and the department isn't at full capacity.

18. The service is still reviewing its building records to confirm how many of the buildings meet the new definition of high risk. Completing this work will allow the service to make a better assessment of the work needed to complete its RBIP.

19. While more work is needed to bring the service's protection work up to standard, there has been encouraging progress since our last revisit in 2019.

### *Culture and values*

20. This was our first revisit to assess progress on the cause of concern relating to the service's culture and values.

21. During our first inspection, we identified significant concerns with the service's culture. While swift action is needed, we recognise that resolving these problems will take time. It is clear that the service is at a very early stage in this work.

22. There have been some early achievements such as creating a workforce planning board and including the service's new values in policies on recruiting and promoting staff. The frequency of communication from senior leaders about changes and improvements in the service has increased. We were pleased to see that recent promotion panels included a black, Asian and minority ethnic representative from Gloucestershire County Council and a female member of staff. Staff we spoke to welcomed this.

23. The service has now adopted Gloucestershire County Council's values. There has been a comprehensive programme of communication and workshops so that all staff fully understand and appreciate the new values. The service has started to incorporate these values into its policies. But more time is needed to fully integrate the values, and to update all service documents and procedures to reflect them.

24. The service's culture action plan includes actions to address our cause of concern, as well as other areas of improvement the service wants to make to its arrangements for people management. We were disappointed to find that its staff had not been asked to contribute to the development of this plan and weren't consulted on its contents.

25. The service has relaunched its equality, diversity and inclusion staff group with members from different backgrounds. Disappointingly, though, the group isn't routinely consulted by the service's senior leadership team on organisational change, plans and issues. The service should consider using this group more broadly in a consultative way to help it achieve cultural change across the organisation.

26. We found a clear sense of commitment and enthusiasm among the service's senior leadership team to improve the service's culture. But, earlier this month, it was announced that the chief fire officer is leaving to take up a similar role at another service. This clearly creates a risk to implementing the service's improvement plans.

27. Staff said they had seen positive changes in the behaviours of senior leaders who are now more accessible and receptive to feedback. That said, staff are frustrated by the slow pace of change. They highlighted their lack of involvement in developing the cultural action plan and lack of information about improvement work.

28. The service has faced several difficulties over the past year, including changes at senior leadership level and responding to the COVID-19 pandemic. But we would have expected more progress to have been made on its culture and values cause of concern sooner and for there to be better internal governance processes in place to assure this work. Additional senior leadership changes will continue to present a risk to the successful development and embedding of the service's cultural change plans.

## Conclusion

29. The service is small in size with understandably limited transformation capacity. It has competing change and improvement requirements with a large volume of work needed to manage these. While work on resolving our causes of concern has progressed, the service has prioritised its resources to resolve significant audit recommendations it received in 2018. That said, much of the preparatory work the service needs to do to support the cause of concern improvements is now complete, and so I look forward to following these plans as they are implemented.

30. Since our last revisit, the service has made positive progress to address its protection cause of concern. Its new policy, definition of high-risk buildings and extra staff have improved the focus and capacity of the department. Further action is needed to implement the new protection management structure, so that all members of the team fully understand their roles and line management responsibilities, and members of staff are fully supported as they develop into their new roles. Validation of building records needs to be completed. This will tell the service how many high-risk buildings it needs to inspect in its RBIP and will show whether it has enough staff.

31. This was the first time we assessed progress on the culture and values cause of concern. There has been some progress, but much more work is needed, more quickly and with better assurance processes in place.

32. The service has adopted Gloucestershire County Council's values and has supported their introduction with a programme of communication and staff workshops. More time is needed for the values to be fully embraced by staff and integrated into service policies. The service would benefit from adopting a more inclusive approach and involving staff in developing plans.

33. The service should consider how it can improve its internal governance arrangements. This is to assure itself that enough progress is being made against both action plans, specifically its cultural action plan. It should also consider how to bring a consistent format to these plans.

34. A significant amount of improvement work and change is needed. The service told us that available capacity and capability might affect its ability to make the necessary improvements. Extra support has been provided by Gloucestershire County Council and the recent service restructure will make an existing area manager responsible for improving the service's culture.

35. We have just begun the second round of our inspections. Before we next inspect your service, we will continue to monitor progress through updates, data returns and other inspection activity. This will include a revisit. When we next revisit and inspect, we will further assess progress against these recommendations and fully consider the issues raised by submissions through our independent reporting line.

36. This letter will be published on our website.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Wendy Williams', with a long horizontal flourish extending to the right.

**Wendy Williams CBE**

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Wales and Western Region