

Report to:	THE BOARD OF SCOTTISH FIRE AND RESCUE SERVICE												
Meeting Date:	24 JUNE 2021												
Report Title:	UNWANTED FIRE ALARM SIGNALS (UFAS) CONSULTATION: PROPOSALS FOR RESPONDING TO AUTOMATIC FIRE ALARMS												
Report Classification:	For Decision	Board/Committee Meetings ONLY For Reports to be held in Private Specify rationale below referring to <u>Board Standing Order 9</u>											
		<u>A</u>	<u>B</u>	<u>C</u>	<u>D</u>	<u>E</u>	<u>F</u>	<u>G</u>					
1	Purpose												
1.1	<p>To provide an initial business case for consulting on options for responding to automatic fire alarms (AFAs), covering:</p> <ul style="list-style-type: none"> Recap of the options appraisal process; A full review of the outcomes of a staff and stakeholder workshop, including conclusions and proposals for consulting on three options, and Plans for public consultation, including a draft Mandate for Consultation. 												
2	Background												
2.1	The Scottish Fire and Rescue Service (SFRS) is going through an options appraisal of models for responding to AFAs. The options appraisal process will provide the basis for public consultation, then a final business case that will enable a decision to be made on a preferred option during December 2021.												
2.2	Work was overseen by the UFAS Review Project Board, to define the options appraisal objectives (Stage One) and arrive at a shortlist of five feasible options for responding to AFAs (Stage Two). The shortlist was developed by following a five-step process that involved identifying a long list of options and assessing them against desirability, viability and feasibility criteria to arrive at the shortlist. The shortlist for further assessment and evaluation was approved by the Strategic Leadership Team (SLT) at its meeting on 27 November 2020. This shortlist is summarised in Table One below, with a more detailed description of each option covered at Appendix A .												
2.3	<p>Table One</p> <table border="1"> <tr> <td>Option 1</td> <td>Maintaining a Status Quo (baseline comparator)</td> </tr> <tr> <td>Option 2</td> <td>COVID-19 Interim Response – immediate blanket one pump response. Exemptions apply to high risk premises</td> </tr> <tr> <td>Option 3</td> <td> <p>Call challenge all AFAs from non-domestic premises. No response is mobilised, if questioning confirms there is no fire, or signs of fire. Sleeping risk premises are exempt from call challenging and will receive the following immediate response:</p> <ul style="list-style-type: none"> Residential Care Homes receive 2 fire appliances regardless time of day. All other sleeping risks receive one fire appliance between 0700-1800hrs and two fire appliances out-with these hours. </td> </tr> </table>							Option 1	Maintaining a Status Quo (baseline comparator)	Option 2	COVID-19 Interim Response – immediate blanket one pump response. Exemptions apply to high risk premises	Option 3	<p>Call challenge all AFAs from non-domestic premises. No response is mobilised, if questioning confirms there is no fire, or signs of fire. Sleeping risk premises are exempt from call challenging and will receive the following immediate response:</p> <ul style="list-style-type: none"> Residential Care Homes receive 2 fire appliances regardless time of day. All other sleeping risks receive one fire appliance between 0700-1800hrs and two fire appliances out-with these hours.
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	Option 4	Call challenge all AFAs from non-domestic premises. No response is mobilised, if questioning confirms there is no fire, or signs of fire. No exemptions to call challenging apply (i.e. all AFA calls received are call challenged, regardless of premises type and caller).																								
	Option 5	Non-attendance to all AFAs from non-domestic premises, unless back-up 999 call confirming fire, or signs of fire is received. Sleeping risk premises are exempt from non-attendance and will receive the following immediate response: <ul style="list-style-type: none"> • Residential Care Homes receive 2 fire appliances regardless time of day. • All other sleeping risks receive one fire appliance between 0700-1800hrs and two fire appliances out-with these hours. 																								
2.4	Engaging with staff and stakeholders during the options appraisal is essential in helping to develop the options being considered and ensure a successful outcome. To facilitate this, a workshop exploring the benefits and risks of each shortlisted option was held on 24 February 2021. This workshop provided the basis for assessing and analysing the shortlisted options (Stage Three) and then agreeing an overall ranking of the options (Stage Four), for consideration as part of a public consultation exercise (Stage Five).																									
2.5	Before entering the public consultation stage, there is an opportunity to review the outcomes of the previous stages, to verify the continued efficacy of work undertaken and where necessary make refinements to the options before they are consulted upon. The following sections, therefore report on the outcomes of Stages Three & Four of the options appraisal, and through a review of these outcomes, they set out proposals that will form the basis of a public consultation.																									
3	Main Report/Detail																									
3.1	<p>February 2021: Staff & Stakeholder Workshop</p> <p>On 24 February, groups of staff and stakeholders classified as high influence/influence interest (Table Two), participated in a Zoom online workshop. The purpose of the workshop was to evaluate the benefits and risks of each of the options for responding to AFAs. To achieve this, the options were evaluated against set assessment criteria, then scored and ranked by the participants.</p>																									
3.2	<p>Table Two</p> <table border="1" data-bbox="233 1352 1436 1644"> <thead> <tr> <th>Staff</th> <th>Numbers</th> <th>Stakeholders</th> <th>Numbers</th> </tr> </thead> <tbody> <tr> <td>SFRS UFAS Champions</td> <td>3</td> <td>Duty Holders</td> <td>15</td> </tr> <tr> <td>Retained and Voluntary Duty System (RVDS)</td> <td>4</td> <td>Fire Industry / Insurance Industry</td> <td>5</td> </tr> <tr> <td>Operations Control (OC)</td> <td>3</td> <td>FBU</td> <td>1</td> </tr> <tr> <td>Wholetime Watch Based</td> <td>3</td> <td>National Associations</td> <td>5</td> </tr> <tr> <td>Prevention & Protection (P&P) Local Managers</td> <td>3</td> <td></td> <td></td> </tr> </tbody> </table>		Staff	Numbers	Stakeholders	Numbers	SFRS UFAS Champions	3	Duty Holders	15	Retained and Voluntary Duty System (RVDS)	4	Fire Industry / Insurance Industry	5	Operations Control (OC)	3	FBU	1	Wholetime Watch Based	3	National Associations	5	Prevention & Protection (P&P) Local Managers	3		
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3.3	Prior to the workshop, stakeholders were provided with an information booklet and a detailed information pack, providing context to the options identified by way of high level benefits and risk descriptors and guidance to help them prepare and fully participate in the process of evaluating each option. To get insights from the participants, they were also invited to complete a pre-workshop questionnaire.																									
3.4	The workshop was hosted by Animate Consulting, an independent organisation that specialises in facilitating groups to reach consensus on matters of importance where all participants have a stake in the outcome. Using a third party to facilitate the event ensured constructive dialogue and a degree of impartiality when participants were evaluating each option. Animate Consulting organised the participants into five diverse panels to assess and score the benefits and risks of each option.																									

3.5	An independent report, covering the results of the workshop was produced by Animate Consulting. A SFRS Workshop Outcome Report, covering the workshop key outcomes and next steps, was produced by the working group. Both reports were shared with participants, inviting their comments and views.
3.6	<p>Outcomes of Staff & Stakeholder Workshop</p> <p>The following summary has been drawn from the pre-workshop questionnaire, the full independent report produced by Animate Consulting and the report produced by the Services working group.</p>
3.7	<p><u>Pre-workshop Questionnaire</u></p> <ul style="list-style-type: none"> • Just under half of the participants (19) responded to the pre-workshop questionnaire – 9 internal and 10 external. • Over three quarters (79%) agreed that the level of UFAS demand is a problem that needs addressed. Nobody disagreed. • Of the five options, participants considered Option 3 to be the most rational proposal, closely followed by Option 5, then Option 2, 4 & 1 in that order. • The majority of participants felt that the options appraisal approach would ensure fair and transparent decision making and that the workshop exercises were appropriate for assessing and scoring the options.
3.8	<p><u>Workshop Assessment of Benefits</u></p> <ul style="list-style-type: none"> • Option 4 offers the largest increase in benefits, with Option 1 (status quo) at the other end of the scale, assessed as offering no benefits. This reaffirms that there is a need for change; status quo is not an option and will only be used as the comparator for assessing options against. • Option 2, 3 & 5 also all offer an increase in benefits, with the benefits rising in that sequence.
3.9	<p><u>Workshop Assessment of Risks</u></p> <ul style="list-style-type: none"> • Option 5 bears the highest overall risk when seeking to reduce UFAS. This result is not unexpected given that the non-attendance option is the greatest shift from the status quo. • Option 1 (status quo) bears the lowest overall risk. Again, this result is not unexpected given the average weight of response of 2 pumps for every AFA actuation received by the Service. However, there are a number of inherent risks by maintaining a status quo (e.g. resultant road risk from blue light journeys). • Option 2 (COVID-19 Interim Response to AFA's) bears an overall low risk. This risk level is realistic and can be validated through the outcomes of a recent review of this interim response¹. • Option 4 bears the second highest overall risk. This result is also not unexpected given that this option call challenges all AFA's, with no exemptions applying. • Option 3 overall risk profile represents the middle ground relative to the other 4 options. The blend of call challenging all AFA's and exemptions applying to sleeping risk premises in this option, infers this overall risk profile is a reasonable representation.
3.10	<p><u>Key Discussion Points and SFRS Response</u></p> <p>The independent report produced by Animate Consulting, identifies key points arising from the five panel discussions. These were reviewed by the working group, with Table Three outlining the SFRS's response to each discussion point, for feedback to the workshop participants. Where relevant, the SFRS responses are linked to actions, for developing the options further and informing the public consultation stage.</p>

3.11

Table Three

	Key discussion points	SFRS response
1	More detail required around the call challenge process being applied to Options 3 & 4.	The consultation document will include more details about the call challenge process. This information will also be covered in more detail during any engagement with OC staff and other key stakeholders, as part of our plans for public consultation.
2	The relative differences afforded by location of services – balancing a desire for reduced demand on Central Belt reserves by remote/rural areas with the fact that fewer call outs may risk stations closing.	The desire to reduce the impact of UFAS demand should not be perceived as an opportunity for closing any fire stations in Scotland, especially those located in more remote/rural locations, that are predominantly served by RVDS staff. Often covering large geographical areas attending a diverse range of emergencies, RVDS stations are of critical importance to the safety and wellbeing of Scotland. Many of these stations also act as a focal point for the community, where they double up as social spaces and community resilience hubs. Reducing UFAS demand in communities served by RVDS stations, will help build capacity for responding to new and growing risks such as wildfires and spate flooding events.
3	The desire for ongoing involvement of organisations to measure the impact of the changes and to consider local arrangements	The SFRS is committed to involving staff and stakeholders throughout the decision-making process, and during the implementation and ongoing monitoring and review of any changes that take place. How we will do this, will be covered in our consultation document and any engagement planned during the public consultation.
4	That Options 3, 4 & 5 would increase the pressure on OC staff to manage 'moral dilemmas'.	We appreciate and recognise these concerns. Options 3, 4 & 5 will involve changes to the way that OC staff handle calls from AFA's. During the public consultation, we plan to hold discussions with our OC staff, to enable us to fully assess the impact of each option. This will enable us to reach a final decision on the best option, and how we implement it going forward. Training OC staff will be a key aspect of any plan, for implementing the preferred option.
5	Fewer call outs would lead to 'improved availability of resources for attending emergencies' and increased time available for training, prevention and diversionary activities' but this would not be evenly spread across the SFRS.	We recognise that the benefits of reduced UFAS calls when broken down, will be felt more by the stations that respond most frequently to these call-outs. However, we felt it was more appropriate to start from a position of what the benefits would be for the SFRS, rather than each individual station. These results would then be used as the basis for more detailed assessment. There is still some background work and analysis to be carried out as we progress through the next stages and towards developing a full business case. This will include building a more detailed picture of how the options will impact UFAS demand and what the benefits will look like at a more localised/station level.

	6	There are sector/organisational specific variations – one size doesn't fit all (e.g. the NHS does not evacuate immediately in some instances).	We would like to get a better understanding of these variations and associated fire safety management practices to help shape the scope and purpose of our public consultation. We are therefore assessing the need for some pre-consultation engagement with the respective stakeholders.
	7	Allocating scores when thinking about large complex sites was challenging. For example, the age and type of buildings could lead to very different risk scores for the same option. Or, whether the alarm is in a staffed or unstaffed area.	We appreciate and recognise assessing and scoring the options was a challenge, but it should be recognised that at this stage of the process, the information provided to support the workshop assessment and scoring was high level and, to an extent, relied on the perspectives of participants when allocating scores against benefits and risks criteria. We are very grateful to the five panels for giving their full consideration to assessing the options and for each of them coming to a consensus on the results of each option.
	8	If speed of response is key, does a call challenge process automatically slow down a response?	As per discussion point one, the consultation document will include details about the call challenge process. This information will also be covered in detail during any engagement planned with Operations Control (OC), staff and other key stakeholders, as part of our plans for public consultation. It should also be noted that activations from an alarm system designed to pose a risk to life should always be accompanied with a back-up call by occupants confirming a fire. Where this is the case, all calls received by persons are treated as a priority and should not result in a notable delay in mobilisation.
	9	How to weigh up the impact of the options on the different motivational factors for RVDS firefighters, if call outs were reduced.	We appreciate and recognise the different motivational factors identified during the panel discussions. During the public consultation, we plan to hold discussions with our RVDS staff, so we fully understand these factors and can make a more informed assessment of the impact of the options on these members of staff.
3.12	<p>Outcomes of Ranking the Options</p> <p>The independent report produced by Animate Consulting, details the five sets of scores and rankings that were produced by each workshop panel, along with the key discussion points and other panel observations. This information has been extremely useful, allowing the working group to compare and understand any variations arising in the rankings across the five panels and, as per Table Three, the information will influence the options and decision-making process going forward.</p>		
3.13	<p>The results from the panels were added together to create overall scores and rankings for each option. As a result, progressing to public consultation, the Service has an overall benefits ranking of the options to consider and an overall risk ranking of the options to assess and compare against. The overall rankings and scores are in the Tables Four & Five. Workshop participants were given the opportunity to feedback their views on the overall rankings and methodology applied for arriving at these, by responding to the SFRS Workshop Outcomes Report produced by the working group.</p>		

3.14

Table Four

	Overall Benefits Ranking	Overall Benefits Score
Option 4	1	1346
Option 5	2	1328
Option 3	3	1042
Option 2	4	804
Option 1	5	300

Table Five

	Overall Risk Ranking	Overall Risk Score
Option 5	1	178
Option 4	2	170
Option 3	3	134
Option 2	4	114
Option 1	5	60

3.15

Conclusions

There is consensus from key stakeholders, that the level of UFAS demand needs to be addressed now and the SFRS’s decision making process for identifying a suitable model for responding to AFA actuations is the right approach. Option 4 has been ranked highest in terms of overall benefits, but this does not infer that this is the best option and therefore automatically rules out the other options, rather it has been assessed as the strongest fit with the benefits criteria. At this stage, this result needs to be considered within the context of the following points and the decision to publicly consult on options:

- Options 4 & 5 offer the greatest benefits, but bear the highest risks.
- Options 4 & 5 overall scores were relatively close together.
- Option 3 overall results, provide a balance between benefits and risks. Pre-workshop, participants rated this as the most rational change option.
- Options 3, 4 & 5 overall results confirm a step change in benefits when compared to Option 1 (Status Quo).
- Option 2 overall results offer improved benefits when compared to Option 1, but considered smaller when compared to the other options.

3.16

Considerations

Prior to the Staff & Stakeholder Workshop and this review of the workshop outcomes, all shortlisted options (includes the status quo as the baseline comparator) were considered as feasible options. The purpose of the Staff & Workshop was to explore these options through the process of assessment, then score and rank them using set criteria. In doing so, further detail against the shortlisted options has enabled this review to draw conclusions and offer some considerations before entering the public consultation stage. With this in mind, it’s recommended that the Service do not progress with Option 2 to public consultation on the following basis:

- Scoring from the workshop and overall ranking of the options, show Option 2 offering relatively small benefits when compared to Options 3, 4 & 5.
- The outcomes of a recent review of this interim response concluded actual blue journey reductions of 21% since its introduction, compared to estimated maximum reductions of 32% using IRS data. The maximum reduction of 32% did not consider discretionary mobilising by Operations Control Staff and therefore explains the optimism bias level of 11%.
- The SFRS has ambitions for achieving significant UFAS reductions. There is evidence that staff and stakeholders support a step change in the way SFRS responds to AFA actuations, to reduce UFAS incidents.
- Based on the above, as a permanent model for responding to AFA actuations, Option 2 will not meet the SFRS’s ambitions for achieving significant UFAS reductions, rather it will continue to deliver moderate reductions in blue-light journeys.

3.17

Should Option 2 be discounted as an option for progressing to public consultation, it will remain as the COVID-19 interim response to AFA actuations until at least the end of December 2021, at which point a preferred option will have been decided for implementation and a plan for making the transition to the new model for responding to AFA’s will then be implemented.

3.18	To confirm, Option 1 (Status Quo) is not an option for maintaining. From the start of the options appraisal process, it has been used as the comparator. It will therefore be going forward to public consultation as the baseline comparator and to highlight the impact of doing nothing.
3.19	<p>Consultation and Communications Plan</p> <p>Following public consultation good practice guidelines, the consultation on options for responding to AFA actuations is planned to run for 12-weeks from 19 July 2021. To reiterate, the SFRS will not be entering this consultation with a preferred option and may consider any additional feasible options or variations of the existing options which arise during the consultation.</p>
3.20	To ensure a wide awareness of the exercise, the Communications and Engagement Team (CET) have developed a Consultation and Communications Plan (Appendix B), targeted at both external and internal stakeholders to raise awareness of the options and maximise responses. An Equality Impact Assessment is appended to the plan and both will be continually reviewed during the consultation exercise.
3.21	<p>Consultation Mandate</p> <p>The Consultation Mandate provides clarity about the purpose of the consultation. It is critical that the Mandate is concise and easy to read and understood. It will be used to inform others such as the media, regarding the purpose of the consultation and its parameters. This is important in managing expectations.</p>
3.22	A draft Consultation Mandate and associated Equality Impact Assessment (EIA) is attached at Appendix C , with a recommendation that the SFRS Board approve the Mandate, to enable the Service to proceed with the public consultation.
3.23	<p>Consultation Document</p> <p>A formal public consultation document has been prepared for consideration by the SFRS Board in private session on 24 June. Following approval, it will be published on 19 July with the launch of the public consultation on options for responding to AFAs.</p>
4	Recommendation
4.1	<p>It is recommended that the SFRS Board:</p> <ul style="list-style-type: none"> • Note the outcomes of the review of the Staff & Stakeholder Workshop; • Approve the plans for consulting on options 3, 4 & 5 commencing 19 July, and in doing so • Approve the Mandate for Consultation.
5	Key Strategic Implications
5.1	Risk
5.1.1	This piece of work supports the management of Strategic Risk Three and is recognised and managed through the Service Delivery Directorate and P&P Function Risk Registers. The UFAS Review Project Board will manage the risks associated with conducting the options appraisal and implementation of a preferred option.
5.1.2	The workshop risk scoring exercise assessed the options against a number of key risks. The outcomes of this risk scoring exercise will help to develop a more detailed risk assessment of each option, which will be taken forward within the final business case planned for the end of the calendar year.

<p>5.2 5.2.1</p>	<p>Financial</p> <p>The detailed information pack, given to participants of the staff & stakeholder workshop, provided information on potential reduced response costs, when comparing each option against the status quo. The estimates were calculated using SFRS current scale of charges², and for Options 3, 4 & 5 are as follows:</p> <table border="1" data-bbox="233 353 1465 589"> <thead> <tr> <th>Status quo</th> <th></th> <th>Option 3 (61%)</th> <th>Option 4 (85%)</th> <th>Option 5 (71%)</th> </tr> </thead> <tbody> <tr> <td>Estimated £6,713,462 response costs per year</td> <td>Estimated reductions in response costs (£)</td> <td>4,095,212</td> <td>5,706,443</td> <td>4,766,558</td> </tr> </tbody> </table> <p>5.2.2</p> <p>Financial estimates (cashable and non-cashable savings), will be further developed and updated in time for the final business case planned for December 2021.</p>	Status quo		Option 3 (61%)	Option 4 (85%)	Option 5 (71%)	Estimated £6,713,462 response costs per year	Estimated reductions in response costs (£)	4,095,212	5,706,443	4,766,558
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Estimated £6,713,462 response costs per year	Estimated reductions in response costs (£)	4,095,212	5,706,443	4,766,558							
<p>5.3 5.3.1</p>	<p>Environmental & Sustainability</p> <p>The detailed information pack, given to participants of the staff & stakeholder workshop, provided estimates of reduced fleet carbon emissions³, when comparing each option against the status quo. The estimated environmental impacts for Options 3, 4 & 5 are as follows:</p> <table border="1" data-bbox="233 891 1465 1135"> <thead> <tr> <th>Status quo</th> <th></th> <th>Option 3 (61%)</th> <th>Option 4 (85%)</th> <th>Option 5 (71%)</th> </tr> </thead> <tbody> <tr> <td>Estimated 575 tonnes of CO2e per year</td> <td>Estimated reductions in CO2e (tonnes per year)</td> <td>351</td> <td>489</td> <td>408</td> </tr> </tbody> </table> <p>5.3.2</p> <p>The options therefore have the potential for supporting the SFRS's challenging carbon emission reduction targets.</p>	Status quo		Option 3 (61%)	Option 4 (85%)	Option 5 (71%)	Estimated 575 tonnes of CO2e per year	Estimated reductions in CO2e (tonnes per year)	351	489	408
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<p>5.4 5.4.1</p>	<p>Workforce</p> <p>The detailed information pack, given to participants of the staff & stakeholder workshop, provided estimates of released capacity for staff to perform other duties. When comparing each option against the status quo, the estimates are as follows:</p> <table border="1" data-bbox="233 1440 1465 1675"> <thead> <tr> <th>Status quo</th> <th></th> <th>Option 3 (61%)</th> <th>Option 4 (85%)</th> <th>Option 5 (71%)</th> </tr> </thead> <tbody> <tr> <td>Average of 14,235 hrs of work capacity lost to UFAS incidents every year</td> <td>Estimated increases in capacity (hrs)</td> <td>8683</td> <td>12,099</td> <td>10,107</td> </tr> </tbody> </table> <p>5.4.2</p> <p>As per the SFRS response to the workforce issues highlighted in the staff & stakeholder workshop key discussion points table (Section 3.12), these will be explored further during the public consultation stage and fully detailed within the final business case planned for the end of the calendar year.</p>	Status quo		Option 3 (61%)	Option 4 (85%)	Option 5 (71%)	Average of 14,235 hrs of work capacity lost to UFAS incidents every year	Estimated increases in capacity (hrs)	8683	12,099	10,107
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Average of 14,235 hrs of work capacity lost to UFAS incidents every year	Estimated increases in capacity (hrs)	8683	12,099	10,107							

² Costings taken from 2020/21 SFRS Scale of Charges and based on an average of 2 pumps mobilised to each UFAS, with a crewing model of 5 and 4 crew members.

³ Estimates of carbon emissions were calculated by SFRS Sustainability Manager, using UK Government current Conversion Figures for UK Greenhouse Gas and converted for normal bio diesel.

5.5	Health & Safety																				
5.5.1	Any reduction in response to UFAS activity would result in lessening road risk and improving community and firefighter safety. The detailed information pack, given to participants of the staff & stakeholder workshop, provided estimates of this as follows.																				
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5.5.2	The above table shows the potential for significant reductions in risk to both members of the public and firefighters through the reduced frequency of fire engines responding on blue lights.																				
5.5.3	The workshop risk scoring exercise, highlighted increased risk to firefighter safety within the context of the options leading to crews mobilising to AFA actuations, that then turn out to be a developed fire and having to deal with this on arrival, with a reduced response. Risk mitigations are highlighted within the Draft Consultation Document and will be covered within the final business case planned for the end of the calendar year.																				
5.6	Training																				
5.6.1	Each option will have training implications associated with its implementation. Staff engagement during the consultation stage, will provide greater understanding of the impact of implementing each option and subsequent training requirements.																				
5.7	Timing																				
5.7.1	Public consultation is planned to commence 19 July for a period of 12-weeks. The final business case with a decision on a preferred option is planned for the end of the calendar year.																				
5.8	Performance																				
5.8.1	As reported in previous reports, the options appraisal objectives agreed at the start of the project, will form the basis for monitoring success.																				
5.9	Communications & Engagement																				
5.9.1	As per Appendix B , a Consultation and Communications Plan has been developed. Following implementation, the plan will be monitored and reviewed by the working group, with oversight from the UFAS Review Project Board.																				
5.10	Legal																				
5.10.1	The Consultation and Communications Plan as noted in 5.9.1 above should be followed in order to mitigate the risk of legal challenges, including judicial review.																				
5.11	Information Governance																				
5.11.1	<i>DPIA completed Yes/No. If not applicable state reasons.</i> A Data Protection Impact Assessment is not required as no personal information has been used within the creation of this report.																				

5.12 5.12.1	<p>Equalities <i>EIA completed Yes/No. If not applicable state reasons.</i></p>
5.12.2	<p>To meet the requirements of the Public-Sector Equality Duty, the Service must be able to demonstrate that the options appraisal process and final decision has had due regard to the General Equality Duty. This should include considerations to eliminate discrimination, advance equality and foster good relations around the protected characteristics as detailed within the Equality Act 2010. As per Appendix D, an Equality Impact Assessment (EIA) is underway. Engagement and consultation is key to this process and the evidence from this will determine how the EIA progresses and develops.</p>
5.12.3	<p>As noted in this paper, stakeholder engagement to date has detailed the welfare of SFRS employees as a concern and highlighted the potential differences for the Scottish Islands and other rural areas. These areas are incorporated into the Equality Impact Assessment process and wider consultation will allow the Service to collate further evidence around the options and their potential impacts.</p>
5.13 5.13.1	<p>Service Delivery Responding to AFA's and subsequent UFAS, places a significant burden on Service Delivery. All options have the potential to reduce UFAS demand, and deliver outcomes that will benefit Service Delivery. The benefit outcomes are summarised in this report and supporting appendices. They will be developed further following public consultation and presented within the final business case planned for the end of the calendar year.</p>
5.13.2	<p>The options will involve changes to the way that OC staff handle calls from AFA's. During the public consultation, SFRS will hold discussions with OC staff, to enable a full impact assessment of each option. This will allow the Service to reach a final decision on the best option, and how we implement it going forward. As per Section 5.5, training will be a key aspect of any plan, for implementing the preferred option.</p>
6	Core Brief
6.1	<p>Proposals for consulting on options for responding to AFA actuations was presented to the SFRS Board and covered the following:</p> <ul style="list-style-type: none"> • Outcomes of the review of the Staff & Stakeholder Workshop; • Plans for consulting on three options, commencing 19 July, and • Draft Consultation Mandate
7	Appendices/Further Reading
7.1	Appendix A: Description of Shortlisted Options for Responding to AFA Actuations
7.2	Appendix B: Consultation and Communications Plan
7.3	Appendix C: Draft Consultation Mandate
7.4	Appendix D: Equality Impact Assessment
7.5	Further Reading: Staff & Stakeholder Workshop Documentation
Prepared by:	Roy Dunsire, Group Commander
Sponsored by:	Stuart Stevens, Assistant Chief Officer, Director of Service Delivery
Presented by:	Stuart Stevens, Assistant Chief Officer, Director of Service Delivery

Links to Strategy and Corporate Values		
SFRS Strategic Plan 2019-22: Objective 1.4: <i>"We will respond appropriately to Unwanted Fire Alarm Signals and work with our partners to reduce and manage their impact on businesses, communities and our service".</i>		
Governance Route for Report	Meeting Date	Report Classification/ Comments
<i>UFAS Review Project Board</i>	<i>14 April 2021</i>	<i>For Scrutiny</i>
<i>Service Delivery Directorate MT</i>	<i>27 April 2021</i>	<i>For Recommendation</i>
<i>Senior Management Board</i>	<i>19 May 2021</i>	<i>For Information</i>
<i>Strategic Leadership Team</i>	<i>24 May 2021</i>	<i>For Decision</i>
<i>SFRS Board</i>	<i>24 June 2021</i>	<i>For Decision</i>

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<i>SFRS Board</i>	<i>24 June 2021</i>	<i>For Decision</i>

SHORTLIST OF OPTIONS FOR RESPONDING TO AFA ACTUATIONS

OPTION 1	<p>Pre-COVID-19 Response (Status quo) – Call challenge all AFA’s from non-domestic premises and respond with minimum one fire appliance. Exemptions apply to sleeping risk premises and calls originating from Alarm Receiving Centres (ARC).</p> <p>This is the SFRS’s routine strategy for responding to AFA’s, which is covered within the SFRS UFAS Policy and associated procedures and will be considered as the baseline for assessing the other four options against.</p>
Description	<p><u>Call Challenge:</u> Operations Control (OC) operator asks the caller a series of questions and following set criteria, determines an appropriate number of fire appliances to mobilise.</p> <p><u>Weight of Response:</u> There are four levels of AFA Pre-Determined Attendance (PDA), the one selected by OC is based on the outcome of the call challenge. Policy decision, is to mobilise at least one fire appliance to every AFA call, with at least two fire appliances mobilised to sleeping risk premises. Calls confirming an actual fire, will attract an immediate full fire PDA response.</p> <p><u>Exemptions:</u> Sleeping risk premises are exempt from call challenging. Alarm Receiving Centres (ARCs) are generally exempt from call challenging.</p>
OPTION 2	<p>COVID-19 Interim Response – immediate response to AFA’s from non-domestic premises with blanket one fire appliance response. Exemptions apply to certain premises types.</p> <p>This was implemented in May 2020, in response to the fast-moving COVID-19 pandemic and is still in operation as the SFRS’s interim strategy for responding to AFA actuations.</p>
Description	<p><u>Immediate Response:</u> On receipt of an AFA call, the OC operator will mobilise a response.</p> <p><u>Weight of Response:</u> A blanket one fire appliance response is mobilised to premises, following receipt of an AFA call. Calls confirming an actual fire, will attract an immediate full fire PDA response</p> <p><u>Exemptions:</u> Sleeping risk premises amongst other certain high-risk premises.</p>
OPTION 3	<p>Challenge all AFA’s from non-domestic premises and respond only to those processed through call challenging, or to premises types exempt from call challenging. In these instances, the number of fire appliances is dependent on time of day and premises type.</p>
Description	<p><u>Call Challenge:</u> OC operator asks the caller a series of questions and following set criteria, determines whether an emergency response is required following the actuation of an AFA. No response is mobilised, if questioning from the OC operator confirms there is no fire, or physical signs of fire.</p>

	<p><u>Weight of Response:</u> If the call challenging process confirms an actual fire, a full fire PDA is mobilised. If the call challenging process cannot verify the cause of the AFA, the OC operator has the discretion to mobilise an appropriate weight of response based on factors such as time of day and premises type.</p> <p><u>Exemptions:</u> Sleeping risk premises will be exempt from the call challenging process and therefore receive an immediate response based on time of day and premises type. The immediate response to exemptions are as follows:</p> <ul style="list-style-type: none"> • Residential Care Homes will receive 2 fire appliances regardless time of day • All other sleeping risks will receive one fire appliance between 0700 – 1800hrs and two fire appliances out-with these hours.
OPTION 4	Call challenge all AFA's from non-domestic premises and respond only to those where the call challenging process cannot verify the cause of the AFA. No exemptions to call challenging apply.
Description	<p><u>Call Challenge:</u> OC operator asks the caller a series of questions and following set criteria, determines whether an emergency response is required following the actuation of an AFA. No response is mobilised, if questioning from the OC operator confirms there is no fire, or physical signs of fire.</p> <p><u>Weight of Response:</u> If the call challenging process confirms an actual fire, a full fire PDA is mobilised. If the call challenging process cannot verify the cause of the AFA, the OC operator has the discretion to mobilise an appropriate weight of response based on factors such as time of day and premises type.</p> <p><u>Exemptions:</u> There are no exemptions to call challenging. The OC operator therefore follows the call challenge process for all AFA calls received, regardless of premises type and caller.</p>
OPTION 5	Non-attendance to all AFA's from non-domestic premises, unless back-up 999 call is received. Exemptions apply to sleeping risk premises types and certain times of day.
Description	<p><u>Non-attendance:</u> There is no call challenging process on receiving a 999-call stating that an AFA has actuated. The OC operator advises the caller, that they ring-back using 999, if they discover a fire.</p> <p><u>Weight of Response:</u> Calls confirming an actual fire, will attract an immediate full fire PDA response</p> <p><u>Exemptions:</u> Sleeping risk premises will be exempt from non-attendance and therefore receive an immediate response based on time of day and premises type. The immediate response to exemptions are as follows:</p> <ul style="list-style-type: none"> • Residential Care Homes will receive 2 fire appliances regardless time of day • All other sleeping risks will receive one fire appliance between 0700 – 1800hrs and two fire appliances out-with these hours.

CONSULTATION AND COMMUNICATIONS PLAN

Consultation on Options for Responding to AFA Actuations - Communications and Engagement Plan

Date	Action	Key message	Audience	Channels	Responsible Officer	Status
15 February 2021	Notify staff of forthcoming stakeholder workshop	Review of interim mobilising arrangements concluded and forthcoming stakeholder event	Staff	SFRS News	MMR	Completed
10 March 2021	LSO Briefing Note 1 re Workshop Outcomes	Ranking of options; no preferred option yet, next steps public consultation	LSO's	Briefing Note via email	RD	Completed
29 March 2021	Share workshop outcome report with participants	Sharing with participants for comment	Stakeholder event participants	Email	RD	Completed
April (Purdah)	Finalise workshop outcome report following feedback	N/A	N/A		RD	Completed
13 April	LSO Briefing Note 2 re next stage in process	Options Appraisal	LSO's	Briefing Note via email	RD	Completed
April	Stakeholder mapping - reassess Agree consultation methodology*	Identify which relevant groups/individuals should be involved in development and refinement of change options	UFAS Project Board and UFAS sub group	Meetings	RD/MMR	Completed
24 May (SLT)	Options Appraisal Review Report, covering key outcomes of stakeholder workshop, and approval of options for consultation	N/A	SLT	Report	RD/AP	Completed

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28 May	LSO Briefing Note 3	SLT decision to consult on three options following a review and recommendations paper being presented	LSO's	Briefing Note via email	RD	Completed
May	Draft consultation document Agree question set EQIAs	Outline options Risks and Benefits	Public Stakeholders	n/a	MMR/MW/DR/RD UFAS PB	In Progress
09 June	Draft consultation doc to SLT	N/A	SLT	N/A	RD/AP	In progress
14 June	Communicate SLT decision and details of consultation timeline	Inform of consultation timeline	Staff and Stakeholders	Email to stakeholders SFRS News/ihub	RD/MMR/ Comms	Not started
24 June	Options Appraisal Update Report to SFRS Board, including draft Public Consultation Document and Consultation Plans.	N/A	SFRS Board	Report	RD/AP	In Progress
June	Prepare Stakeholder Lists		LSO's/ SDA staff	Email to stakeholders	MMR	In Progress
June	Develop web pages FAQs Design online survey Develop digital assets – introductory video, social media posts Identify key spokespeople Press release BSL video PPT Presentation LSO toolkit Postcard Flyers for crews attending AFAs iHub and web banners	Summary of key themes, Benefits and risks	Public, staff and stakeholders Third party distributors for consultation	SFRS Website, SFRS News, ihub, LSO and stakeholder briefing pack, SFRS Social Media channels	Comms	Not Started

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June	<p>Arrange engagement sessions for the following staff groups:</p> <ul style="list-style-type: none"> • LSO's • RVDS • OC 	Highlight the consultation, process and timings, LSO briefing pack, opportunity for Q&A's	Staff	Internal meetings or online sessions	Comms	Not Started
June	<p>Arrange meetings etc. Opportunity for any pre-consultation engagement based on findings of stakeholder workshop and review of stakeholder mapping (e.g. NHS Boards, ARC's)</p>		Stakeholders		RD/AP/MMR	Not Started
19 July	<p>Launch Public launch – press release Social Media launch Targeted emails to stakeholders</p>	<p>Highlighting the consultation Consultation process and timings Inviting participation</p>	Public Stakeholders and staff	<p>Targeted emails to stakeholders Media SFRS website SFRS News, Ihub SFRS Social Media Channels</p>	Comms	Not Started
By 18 October	Communicate end of process and next steps	Ongoing process and updates	Public, stakeholders and staff	<p>Email to stakeholders All social media channels SFRS website LSO Briefing Note</p>	Comms	Not Started
Oct/Nov	Analyse consultation feedback	Impartial and accurate evaluation			Data Services	Not Started
08 Dec (SLT) 16 Dec (Board)	Final business case proposal to the SLT/Board	Evaluation of analysis and recommendation for approval of preferred options	SLT/Board		RD/AP	Not Started

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By end December	Communicate final decision	Outcome, rationale and implementation	Public, stakeholders and staff	Email to stakeholders All social media channels SFRS website LSO and stakeholder briefing packs	Comms	Not Started
Dec/Jan	Consider best practice approach for organisational consultations moving forward	Record learning outcomes	SPPC		Consultation manager	Not Started

APPENDIX: CONSULTATION AND COMMUNICATIONS PLAN EQUALITY IMPACT ASSESSMENT

**Equality & Human Rights Impact Assessment Recording Form
Scottish Fire and Rescue Service**

**PART 1
BASIC INFORMATION**

Policy Owner	ACO Stuart Stevens - Director of Service Delivery
E&D Practitioner	Denise Rooney
Title (of function/policy to be assessed e.g. name of policy, title of training course)	Public Consultation on the SFRS response to Unwanted Fire Alarm Signals (UFAS) Consultation and Communications Plan
Date Assessment Commenced	7 June 2021

The purpose of the following set of questions is to provide a summary of the function/policy.

Briefly describe the aims, objectives and purpose of the function/policy	<p>The Scottish Fire and Rescue Service is evolving to meet the changing safety needs of communities across Scotland.</p> <p>To support this work and to create capacity within the Service, we are reviewing the way in which we respond to UFAS incidents. Following an internal review and formal options appraisal with key stakeholders SFRS has developed three potential options for amending our response.</p> <p>These are being taken forward for public consultation which will open on Monday 19 July 19 July and close on Monday 11 October. The purpose of the consultation is to inform and engage with communities, stakeholder groups and partner agencies in the selection of a new response model to unwanted fire alarm signals</p>
Are there any associated objectives of the function/policy (please explain)?	<p>The responses to this consultation will help to inform the final proposal to the SFRS Board on the response to UFAS signals across Scotland.</p> <p>SFRS is fully committed to respecting people's opinions in how we design and deliver our services and, equally, to ensuring that their voice will help us shape what we do.</p>
Does this function/policy link with any other function/policy?	The UFAS consultation is supported by the SFRS long-term strategic vision, National Fire Framework and SFRS strategic plans.
Who is intended to benefit from the function/policy and in what way?	The aim of the consultation process is to ensure key stakeholders and the people of Scotland, including those whose voices are seldom heard are encouraged and supported to participate in the consultation.

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<p>What outcomes are wanted from this function/policy?</p>	<p>We want to ensure our decision-making process is fully informed using the feedback of key stakeholders to shape the outcome of the UFAS review.</p>
<p>What factors/forces could contribute/detract from the outcomes?</p>	<p>SFRS is seeking the views from stakeholders and the wider public on the options for change. Failing to ensure key stakeholders can participate in the engagement process and offer feedback on the options may mean the final decision of the Board may not be clearly understood by stakeholders, which would, in turn, impact on our ability to successfully implement its aims.</p> <p>Feedback is also important to help identify any areas of risk SFRS may not have considered or any mitigations which could be put in place to address any concerns raised by stakeholders.</p>
<p>Who are the main stakeholders in relation to the function/policy?</p>	<ul style="list-style-type: none"> • Communities • SFRS Personnel and Board • Partner Agencies in the Public Sector, • 3rd Sector and Charity Sector • Staff Representative Bodies • Scottish Government • Scotland's business communities
<p>Who implements the policy and who is responsible for the function/policy?</p>	<p>SFRS / Director of Service Delivery</p>

**PART 2
ESTABLISHING RELEVANCE**

- This section is designed to determine the relevance of the function/policy to equality.
- This section also fulfils our duty to consider the impact of our activities in relation to Human Rights.
- Initial screening will provide an audit trail of the justification for those functions not deemed relevant for equality impact assessment.
- Throughout the process the evidence and justification behind your decision is more important

Q1. The function/policy will or is likely to influence SFRs ability to....

- Eliminate discrimination, victimisation, harassment or other unlawful conduct that is prohibited under the Equality Act 2010 and/or;
- Advance equality of opportunity between people who share a characteristic and those who do not and/or;
- Foster good relations between people who share a relevant protected characteristic and those who do not.

Please tick as appropriate.	Yes/ Potential	No	Don't Know/Don't Have Enough Evidence
Age	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Caring responsibilities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Disability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gender reassignment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Marriage and civil partnership (answer this only in relation to point a above)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Pregnancy and maternity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Race	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Religion and belief	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sex (gender)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sexual Orientation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Social and economic disadvantage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you have selected 'No' for any or all of the characteristics above please provide supporting evidence or justification for your answers.

AND,

If you have identified any potential links to other functions/policies please comment on the relationship and relevance to equality.

The UFAS Consultation directly links to the SFRS Strategic Plan, the National Performance Framework, the Justice in Scotland Vision and Priorities, the Fire and Rescue Framework for Scotland 2016 and the strategic operating priorities and objectives of the SFRS. The consultation plan and stakeholder mapping exercise aims to ensure those who fall within the protected characteristics are given the opportunity to participate in the consultation process.

Marriage and Civil Partnership within the context of the Equality Act 2010 extends only to protection from discrimination in employment practices and is, therefore, not relevant to the consultation exercise.

Q2. Is the function/policy relevant to the Human Rights Act 1998?

Yes **No** **Don't Know**

If you have selected 'No' please provide supporting evidence or justification for your answers

AND,

If you have identified any potential links to other functions/policies please comment on the relationship and relevance to Human Rights.

This Policy also relates directly to article 14 of the Human Rights Act 1998. Protection from discrimination. The Human Rights Act makes it illegal to discriminate on a wide range of grounds including 'sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status'.

The recording of some personal and sensitive information will be relevant to Human Rights as it relates to Article 8 – Right to Respect for Private and Family Life. The issues do not, however, extend beyond those rights protected under the General Data Protection Regulation (GDPR) 2018, and the SFRS will implement and monitor compliance with a Data Protection policy.

There is also an associated Data Protection Impact Assessment (DPIA) for this consultation exercise.

Concluding Part 2

Outcome of Establishing Relevance	Please Tick	Next Steps
There is no relevance to Equality or the Human Rights Act 1998	<input type="checkbox"/>	<u>Proceed to Part 4 Monitoring</u>
There is relevance to some or all of the Equality characteristics and/or the Human Rights Act 1998	<input checked="" type="checkbox"/>	<u>Proceed to Part 3 Impact Assessment</u>
It is unclear if there is relevance to some or all of the Equality characteristics and/or the Human Rights Act 1998	<input type="checkbox"/>	<u>Proceed to Part 3 Impact Assessment</u>

**PART 3
IMPACT ASSESSMENT**

Describe and reference:

- relevant issues
- evidence gathered and used
- any relevant resolutions to problems
- assessment and analysis
- decision about implementation
- justification for decision
- potential issues that will require future review
- the results of any consultation required

Characteristic	
<p>Age</p>	<p>Scotland has an aging population with over 17% of the Scottish population aged 65 or over. This group of people now outnumber the amount of under 15's for the first time and this is expected to rise as we live longer (Scottish Census 2011).</p> <p>Older age groups have been disproportionately affected by COVID-19 with increased levels of isolation and loneliness amongst this group and reductions in social engagement channels restricting participation in public life. This was compounded by the shift to using technology further highlighting how digitally excluded older people are, with Age Scotland estimating that over half a million people over 60 do not use the internet and over 350,000 older people living alone (Age Scotland).</p> <p>There is some evidence that suggests that older people are less likely to make use of social media sites and other technology based communications compared to younger people as detailed above. This does not mean that older people do not make use of this method of communication nor does it indicate that younger people will certainly make use of this kind of communication tool. Digital poverty amongst younger age groups is an emerging area of concern.</p> <p>With older people more at risk from some age-related disabilities this may influence the type and method of communication that some older people access. Where individuals have typically relied on one or two types of communication such as newspapers, television or leaflet campaigns to get information, they may no longer be able to access these due to a significant visual impairment and may not have a replacement for these methods.</p> <p>To provide for an inclusive consultation exercise on the grounds of age (for older and younger people) SFRS will work closely with our LSO Areas, local partners and national charities/organisations, make hard copies of the consultation available on request and provide assistance in providing feedback on The Long Term Visions document. While we will make full use of digital means of engagement we will provide alternative way of engaging with SFRS such as through our local partnership arrangements.</p>

<p>Caring Responsibilities</p>	<p>In the UK population there are approximately seven million carers with responsibility for a dependent who has a disability or other long-term impairment or health condition – approximately 42% are men and 58% are women. By 2030, it is expected that the number of carers will increase by 3.4 million (around 60%). In Scotland the overall number of carers aged over 16 is approximately 759,000 of which 29,000 are young carers – 17% of the population.</p> <p>While carers can be the main point of contact for a household, carers themselves can often experience isolation and exclusion from participation in public life due to the demands on their time arising from their caring responsibilities. Providing for an inclusive consultation exercise for this group involves engaging with relevant partner agencies and utilising local SFRS personnel in communicating the purpose of the UFAS Consultation document in the delivery of their community engagement activities.</p> <p>Scotland's Care Experienced children and young people are more likely to experience digital poverty than young people not in this group. This group of young people is more likely to move into independent living at a younger age than those not in this group. Involving care experienced young people in the consultation exercise to inform the future shape of the fire service requires direct engagement with stakeholder groups such as Who Cares? Scotland and Staf (Scottish Through Care and After Care).</p>
<p>Disability</p>	<p>20% of people in Scotland are disabled according to the definition of the Equality Act 2010 (Office for National Statistics – Census Results – 2011). Of this 20% its estimated 3.1% have a Specific Learning Difference (SpLD), 6.6% have hearing loss or partial hearing loss and 2.6% are blind or partially sighted, 6.7% identified as having a physical disability, 4.4% with a mental health condition.</p> <p>Individuals with a disability may have individual specific requirements in the content, nature and method of communication compared to someone who does not have a disability. This is particularly the case for individuals with a sensory impairment or disability, a learning difficulty or disability or individuals with mental health condition or cognitive condition that may impair comprehension and/or speech and writing.</p> <p>Access to information for individuals with a disability may be affected due to a factor associated with their disability such as social or economic disadvantage. For example, an individual with a disability affecting their mobility and who lives in a rural area may not have ready access to general SFRS communications due to physical isolation and technological isolation (i.e. they cannot afford to own a computer which would provide access to online communication – there is evidence of a correlation between disability and low-income households).</p> <p>The term disability covers a wide range of impairment types and conditions and it is important to recognise that disabled people are not a homogenous group and will have a range of needs and experiences. Therefore, we must tailor the consultation to support these differing needs.</p> <p>The consultation survey is estimated to take no longer than 10 minutes to complete, so should be favorable to those with restricted attention span,</p>

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	<p>although support in completing the consultation may be provided on request.</p> <p>Alternative formats can be provided on request such as hard copy and electronic versions compatible with text to speech software.</p> <p>Engaging with stakeholder groups, especially at a local level will support the inclusion of individuals with a disability in the consultation exercise and in shaping the final option for implementation by SFRS.</p>
Gender reassignment	<p>The consultation in itself will not have a disproportionate effect on this Protected Characteristic, however the LGBT Foundation indicates that this group have been particularly affected by COVID-19 and have experienced an increase in social isolation, mental health issues and general loneliness, COVID-19 aside they are a 'hard to reach group' therefore we need to work with local and national organisations and charities to ensure the voice of trans and non-binary people is heard.</p> <p>When engaging directly with a trans person we will respect the person's self-identity and use the same terms and pronouns that the person uses to describe themselves.</p>
Marriage and Civil Partnership	<p>The consultation exercise is not relevant to this protected characteristic. The Equality Act 2010 specifically relates to protecting people on the grounds of marriage and civil partnership status in employment practice.</p>
Pregnancy and maternity	<p>The consultation has no relevance on the grounds of pregnancy and maternity as it relates to the participation of communities, stakeholders and partner agencies.</p> <p>There is a requirement for SFRS to ensure that employees who are on maternity leave are kept informed of the consultation document, ambitions and consultation exercise and can contribute. In this regard, SFRS will make use of the existing workplace arrangements for line managers to engage with employees who are on maternity leave.</p>
Race	<p>According to Census data (2011) the clear majority of the population in Scotland remains white Scottish at 84%, 7.9% identify as other White Other British, 1% White – Irish, 1.2% white Polish, 2% white Other, 2.7% Asian, Asian Scottish or Asian British and 1.3% other Ethnic Groups.</p> <p>In terms of language (Census Data 2011) 98.6% confirm that they speak English well or very well. 1.2% do not speak English well, 0.2% do not speak English at all, 1.1% have some Gaelic language skills, 30.1% are able to speak Scots and 3.9% use a language other than English in the home. An ability to speak English well is not the same as being able to read and write it well and it is important that the consultation exercise is supported by engagement activities with community stakeholder groups to bolster the written elements of the consultation.</p> <p>Due to cultural differences and barriers some communities may favour engagement through male representatives excluding women or older members of the community. SFRS will engage directly with women's groups based around race, nationality, culture, religion and ethnicity to provide us with the insights and views of as broad a range of people as possible.</p>

	<p>Travelling communities, whether in permanent and static or non-static or semi-static residences, often have reduced access to services and may experience isolation from the broader population. Therefore, establishing trust with individual local communities and building personal relationships is particularly important and we should utilise the local and national partnerships we have to gauge the thoughts and opinions of the Gypsy/traveller communities.</p> <p>The consultation can be provided on request in alternative formats and languages where a barrier to participation would exist if we did not make these adjustments.</p>
<p>Religion and Belief</p>	<p>The 2011 Census indicates just over half (54%) of the Scottish population stated their religion as Christian – a decrease of 11% since 2001, whilst 37% of people stated that they had no religion – an increase of 9%. More than 6 out of 10 people said that their religion was Christian (65%); 42% Church of Scotland, 16% Roman Catholics and 7% other Christian.</p> <p>After Christianity, Islam was the most common faith with 77,000 people in Scotland describing their religion as Muslim. This is followed by Hindus (16,000), people from other religions (15,000), Buddhists (13,000), Sikhs (9,000) and Jews (6,000). These groupings account for less than 3% of the overall population. Numbers reporting 'Muslim' and 'Other religion' both doubled in the decade from 2001. Most people from 'Muslim', 'Hindu', 'Sikh' and 'Jewish' religions live in large urban areas (this corresponds with a high density of minority ethnic groups within these areas).</p> <p>The 'Muslim', 'Sikh', 'Hindu', and 'Buddhist' profiles were relatively young compared to the population. Almost a third of 'Buddhists' were 'White: Scottish', with a quarter 'Chinese' and a quarter 'Other Asian'. Most 'Hindus' (82%) and 'Sikhs' (83%) were of 'Indian' ethnicity. 82% of those who identified as 'Hindu' were born outside of the UK and 64% of 'Hindus' arrived between the ages of 16 and 34. The majority of 'Muslims' and 'Buddhists' who lived in Scotland on census day were born outside of the UK.</p> <p>Almost 60 per cent of 'Jewish' people were 'White Scottish', 18 per cent were 'White: Other White' and 16 per cent were 'White: Other British'. The majority (58%) of 'Muslims' in Scotland were of 'Pakistani' ethnicity, with a mixture of ethnicities making up the remaining 42%. Eighty-five per cent of those reporting 'No religion' identified as 'White Scottish' and most of the remainder (10%) were 'White: Other British'</p> <p>There are very few issues arising from religion in isolation of other cultural factors and those relating to race, ethnicity or nationality. Sectarianism remains an issue to varying degrees within Scotland, and one that the SFRS is aware of.</p> <p>Engaging directly with Scotland's faith groups at national and local level will be met within the consultation plan.</p>
<p>Sex (gender)</p>	<p>Scotland's population figure for 2011 has a gender split of 51.5% females to 48.5% males (2011 Census: First Results on Population Estimates for Scotland).</p> <p>Due to cultural differences and barriers some communities may favor engagement through male representatives excluding women or older</p>

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	<p>members of the community. SFRS will engage directly with women's groups based around race, nationality, culture, religion and ethnicity to provide us with the insights and views of as broad a range of people as possible.</p>
<p>Sexual Orientation</p>	<p>The consultation in itself will not have a disproportionate effect on this Protected Characteristic, however recent research by the LGBT Foundation indicates that LGBT people have been particularly affected by COVID-19 and have experienced an increase in social isolation, mental health issues and general loneliness, COVID-19 aside they are a 'hard to reach group' therefore we need to work with local and national organisations and charities to ensure the voice of the LGBT community is heard.</p> <p>There is some evidence that LGBT people from more rural areas often relocate to one of the large cities as they reach adulthood. Moving is not generally an option for those young people still in school or those with limited social mobility. Issues affecting people outside large metropolitan areas can be different to those within; therefore, engagement to address needs has to occur at a local level.</p> <p>When engaging directly with a person who identified as LGBT we will respect the person's self-identity and use the same terms and pronouns that the person uses to describe themselves.</p>
<p>Social and economic disadvantage</p>	<p>Scotland has numerous areas identified as having multiple indicators of deprivation (MID). It is important to note that more than 50% of those households considered to be financially poor are not located within areas of MID.</p> <p>Evidence shows that overall poverty is higher among ethnic minority groups than within the majority white population (Joseph Rowntree Foundation, <i>UK Poverty 2018: A comprehensive analysis of poverty trends and figures</i>).</p> <p>Corporate Parenting for young people in or leaving care is and remains priority for us, to try to provide better life chances for this traditionally disadvantaged group therefore we must work with our local and national partners to ensure those leaving care, in kinship care are heard.</p> <p>Connectivity to high quality fast broadband can be an issue for those who live in our Island Communities, therefore we ensure that other means of completing the consultation are offered and promoted in remote areas to ensure rural communities can participate.</p>
<p>Human Rights</p>	<p>There is no evidence of relevance to Human Rights in the consultation process. The consultation does not address any issues that would be relevant to issues such as right to private and family life, prohibition of torture, no punishment without fair trial or any of the other protocols or articles.</p>
<p>Impact on People in General not covered by specific characteristics</p>	<p>People may not be engaged with the document or may not participate in the process. A range of communications methods will be used to engage with stakeholders and encourage participation</p>

Summary and Conclusion of Impact Assessment

This Equality and Human Rights Impact Assessment has been progressed to support the consultation exercise for the UFAS Consultation Process and will be reviewed and revised as appropriate to reflect the different phases of the engagement process.

The consultation exercise is relevant to the General Equality Duty as it relates to:

- The duty to remove unlawful discrimination
- The promotion of equality of opportunity
- The promotion of good relations

and, is relevant on the grounds of the protected characteristics of: age, disability, sex, pregnancy and maternity, gender reassignment, sexual orientation, race and religion and belief. There is relevance also to the characteristics of island communities, care provision, care experience and on the grounds of human rights.

The evidence relating to the protected characteristics contained within this impact assessment should be considered within the context of UFAS and the predominance of Duty Holders as contributors to the consultation exercise. Some of the potential barriers to participation identified for the broader population may not exist in the capacity of providing feedback as a Duty Holder or stakeholder organisation. Nonetheless, the consultation exercise will be conducted to err on the side of accessibility and is open to the wider population who may have an interest in providing feedback.

In completing this impact assessment and planning for the consultation exercise SFRS has been mindful of the potential barriers to participation relating to the protected characteristics. Of note are the following points:

Reaching a broad audience	To provide for as many viewpoints to be heard as possible we are making direct approaches to stakeholder groups representing all the characteristics we have listed above.
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We will utilise our well established local community engagement arrangements to provide multiple avenues to contribute to this important piece of work.

Restricted access or use of digital communications	We are mindful that not everyone will be able to participate by accessing the consultation through our website. By making direct approaches to community stakeholder groups, charities and our partner agencies we aim to extend the reach of our consultation.
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We will provide hard copies of our consultation documents when requested and can provide assistance in completing the return.

Barriers to participation arising from a disability	The UFAS Consultation Document is not an insubstantial document and it does contain a lot of information. We have tried as far as possible to simplify the language we have used and avoided jargon. We would be happy to provide further explanation of the document should someone require this.
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We can provide assistance on completing a return on the consultation. We can also provide the documentation in alternate formats such as large text hard copy or an electronic version compatible with text to speech software. We will encourage specific requests for

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Barriers to participation arising from a language barrier	<p>alternative means of participating in the consultation exercise and accommodate those where we can.</p> <p>According to the 2011 census the overwhelming majority of people living in Scotland are proficient in spoken and written English, but we are mindful that this will not be the case for everyone. To provide for as many viewpoints to be heard as possible we are making direct approaches to stakeholder groups representing all the characteristics we have listed above including those who are likely to interact with individuals who do not have English as a first language.</p> <p>We can make the consultation documentation available in electronic format that is compatible with translation software such as Google translate.</p> <p>The purpose of the consultation exercise is to capture feedback on our options for change. We will use the feedback we receive through the consultation exercise to help us populate the impact assessment of the UFAS Consultation Plan.</p>
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Concluding Part 3

Impact Assessment	Please Tick	Next Steps
There is no relevance to Equality or the Human Rights Act 1998	<input type="checkbox"/>	<u>Proceed to Part 4 Monitoring</u>
There is relevance to some or all of the Equality characteristics and/or the Human Rights Act 1998 and relevant actions are recorded above in Summary and Conclusion	<input checked="" type="checkbox"/>	<u>Proceed to Part 4 Monitoring</u>

PART 4 MONITORING & REVIEW

- The purpose of this section is to show how you will monitor the impact of the function/policy.
- The reason for monitoring is to determine if the actual impact of the function/policy is the same as the expected and intended impact.
- A statement on monitoring is required for all functions/policies regardless of whether there is any relevance to Equality or the Human Rights Act.
- The extent of your answer will depend upon the scope of the function/policy to impact on Equality and Human Rights issues.

If you have provided evidence or justification for believing there is no relevance to Equality or the Human Rights Act in Section 2 Establishing Relevance or Section 3 Impact Assessment:

Q1 How do you intend to monitor and review the function/policy?

Participants will be asked to complete an Equalities Monitoring Form

If you have provided evidence or justification for believing there is relevance to Equality or the Human Rights Act:

Q2 What will be monitored?

The uptake of consultation completion, the split of participation across Protected Characteristics

Q3 How will monitoring take place?

Monitoring will take place at the end of the consultation process and results will inform the final options selected for UFAS response and inform further engagement activities.

Q4 What is the frequency of monitoring?

Once at the end of the consultation process.

Q5 How will monitoring information be used?

To inform additional engagement activities. To inform the decision regarding a new way of responding to UFAS calls.

PART 5 APPROVAL

This Equality and Human Rights Impact Assessment was completed by:

Name	Marysia Waters, Head of Communications and Engagement
Date	7 June 2021

This Equality and Human Rights Impact Assessment was approved by:

Name	Elaine Gerrard, Equality and Diversity Manager
Date	7 June 2021

**Working together
for a safer Scotland**



**SCOTTISH
FIRE AND RESCUE SERVICE**

Working together for a safer Scotland

Unwanted Fire Alarm

Scottish Fire and Rescue Service

Signals (UFAS) Consultation Mandate

Safety. Teamwork. Respect. Innovation.

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The Scottish Fire and Rescue Service (SFRS) seeks the views of:

- Staff representative bodies
- SFRS staff inc RDS, Wholetime, OC and support staff
- RDS employers
- NHS Fire Safety Advisory Group
- Duty Holders of relevant premises, with responsibilities for complying with the Fire (Scotland) Act 2005 and the Fire Safety (Scotland) Regulations 2006.
- Elected representatives
- Scottish and Local Government including CoSLA, local authorities and Community Planning Partners
- Health Agencies such as NHS Boards, Health and Social Care Partnerships, Public Health Scotland, Hospitals and medical care practices, hospices, private hospitals
- Appropriate scrutiny bodies such as Audit Scotland, HM Fire Service Inspectorate, Education Scotland and Care Inspectorate
- Local business representative organisations
- Local businesses sector
- Higher and further education sector including school accommodation providers
- Blue light partners
- Third sector representative bodies
- Community Councils and Community Safety Groups
- Fire Safety industry and Insurance companies
- Alarm Receiving Centres
- Wider public

Concerning the potential viable options and impacts of the development and introduction of new policies and practices with regards to the SFRS's response to Unwanted Fire Alarm Signals (UFAS) to effectively manage the significant demands placed upon the SFRS and all of Scotland's communities when responding to false alarm calls that originate from automatic fire alarm systems (AFA).

This Consultation will enable the SFRS Board to consider and be influenced by the responses to the consultation from a range of stakeholders and interested parties, and with other relevant information and research data, agree a strategic and operational approach which will be safe, effective and sustainable whilst maximising the use of the service's resources to continue to minimise the risk to Scotland's public and firefighter safety.

The Public Consultation phase will take place between July to October 2021 through a range of accessible methodologies to ensure those with an interest have an opportunity to contribute.

The agreed model for responding to AFA's at non-domestic premises will ensure the SFRS continues to provide appropriate and proportionate levels of response, whilst maximising efficiency savings through reduced mobilisations to expand its capacity to invest in prevention activities because of a reduced operational response to false alarm call outs.

APPENDIX D – OPTIONS APPRAISAL EQUALITY IMPACT ASSESSMENT

**Equality & Human Rights Impact Assessment Recording Form
Scottish Fire and Rescue Service**

**PART 1
BASIC INFORMATION**

Policy Owner	Director of Service Delivery
E&D Practitioner	Denise Rooney
Title (of function/policy to be assessed e.g. name of policy, title of training course)	Reducing Unwanted Fire Alarm Signals (UFAS) - Options for responding to AFAs. This has been conducted through an options appraisal process, leading to a public consultation on 3 options, then a final business case setting out a preferred option during December 2021.
Date Assessment Commenced	26.10.20 – Denise Rooney 06.11.20 – Reviewed to take cognisance of shortlisted options. 28.01.21 – Reviewed by Denise Rooney to update Island Impact Assessment 25.03.21 – Reviewed by Denise Rooney to include feedback from Stakeholders Event 24.02.21 22.04.21 – Reviewed by Denise Rooney to include the Comms and Engagement Plan 06.05.21 – Reviewed by James Clark and Denise Rooney 03.06.21 – Reviewed by Denise Rooney to incorporate EIA Executive Summaries.

The purpose of the following set of questions is to provide a summary of the function/policy.

Briefly describe the aims, objectives and purpose of the function/policy	To identify a model for responding to AFA's at non-domestic premises, that will achieve an optimum balance of: <ul style="list-style-type: none"> • Minimising risk to public safety and firefighter safety. • Maintaining an effective response to confirmed fires originating as an AFA. • Maximising efficiency savings through reducing mobilisations and expanding the services capacity to invest in prevention and other value adding activities. • Having regard to relevant risk factors (e.g. time of day, occupancy, special risks). • Supporting the services commitment to achieving carbon reduction targets.
Are there any associated objectives of the function/policy (please explain)?	The SFRS attends on average 28,471 UFAS incidents per year accounting for 31% of all SFRS incident activity. This level of demand places an unnecessary burden on our resources and often causes significant interruption to businesses, health establishments and educational institutions across Scotland.

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	The unnecessary mobilisation of fire appliances to UFAS also has the potential to impact on the safety of both firefighters and communities as vehicles respond to incidents under blue light conditions. Reducing such unnecessary activity means our firefighters can focus on building and maintaining their skills to meet the new demands and risks Scotland's people and communities face.
Does this function/policy link with any other function/policy?	<ul style="list-style-type: none"> • The SFRS's permanent UFAS Policy and Supporting Procedures, introduced on 01 December 2014. • The Fire and Rescue Framework for Scotland 2016, which introduced reducing UFAS as one of the Scottish Ministers' priorities for the SFRS to progress. • The SFRS Strategic Plan 2019-22, which details the need to reduce UFAS as a strategic objective of the Service. • The COVID-19 Interim response to AFAs, which is currently operating during the pandemic. • The recommendations arising from HMFSI's Report – Managing Automatic Fire Signals (2015), which examined the effectiveness of the SFRS's Policies and Procedures for managing automatic fire signals. • The SFRS UFAS Stocktake Review, that evaluated the effectiveness of the SFRS approaches for managing UFAS demand and set out recommendations.
Who is intended to benefit from the function/policy and in what way?	SFRS employees, stakeholders and wider public.
What outcomes are wanted from this function/policy?	The SFRS is placing increased emphasis on reducing UFAS demand and has ambitions for achieving significant improvements in performance and releasing capacity to meet future challenges and risks.
What factors/forces could contribute/detract from the outcomes?	<p>Evidence collated from the review of the Covid-19 interim response to AFAs provide an insight into some of the potential options and positive outcomes.</p> <p>Lack of significant engagement and worthwhile data on which to make an informed decision.</p>
Who are the main stakeholders in relation to the function/policy	<p>Internally: Wholetime, Ops Control, RVDS, UFAS Champions, FBU</p> <p>Externally: Duty holders with fire safety responsibilities for relevant premises; Alarm Receiving Centres; fire industry; insurance industry.</p>
Who implements the policy and who is responsible for the function/policy?	Service Delivery Directorate

**PART 2
ESTABLISHING RELEVANCE**

- This section is designed to determine the relevance of the function/policy to equality.
- This section also fulfils our duty to consider the impact of our activities in relation to Human Rights.
- Initial screening will provide an audit trail of the justification for those functions not deemed relevant for equality impact assessment.
- Throughout the process the evidence and justification behind your decision is more important

Q1. The function/policy will or is likely to influence SFRs ability to....

- d) Eliminate discrimination, victimisation, harassment or other unlawful conduct that is prohibited under the Equality Act 2010 and/or;
- e) Advance equality of opportunity between people who share a characteristic and those who do not and/or;
- f) Foster good relations between people who share a relevant protected characteristic and those who do not.

Please tick as appropriate.	Yes/ Potential	No	Don't Know/Don't Have Enough Evidence
Age	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Caring responsibilities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Disability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gender reassignment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Marriage and civil partnership (answer this only in relation to point a above)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Pregnancy and maternity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Race	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Religion and belief	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sex (gender)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sexual Orientation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Social and economic disadvantage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you have selected 'No' for any or all of the characteristics above please provide supporting evidence or justification for your answers.

AND,

If you have identified any potential links to other functions/policies please comment on the relationship and relevance to equality.

- SFRS's permanent UFAS Policy and Supporting Procedures
- UFAS Stocktake Review and recommendations
- The recommendations arising from HMFSI's Report – Managing Automatic Fire Signals (2015), which examined the effectiveness of the SFRS's Policies and Procedures for managing automatic fire signals.
- The publication of The Fire and Rescue Framework for Scotland 2016 ('the Framework'), which introduced reducing UFAS as one of the Scottish Ministers' priorities for the SFRS to progress.

- The publication of the SFRS Strategic Plan 2019-22, which details the need to reduce UFAS as a strategic objective of the Service.
- Scotland's National Performance Framework in relation to the national outcomes of:
 - 1) 'We live in communities that are inclusive, empowered, resilient and safe'
 - 2) 'We respect, protect and fulfil human rights and live free from discrimination'

Q2. Is the function/policy relevant to the Human Rights Act 1998?

Yes **No** **Don't Know**

If you have selected 'No' please provide supporting evidence or justification for your answers

AND,

If you have identified any potential links to other functions/policies please comment on the relationship and relevance to Human Rights.

Article 2, the Right to Life: The right to life is a fundamental right under international law. In the UK, the right to life is guaranteed by Article 2 of the European Convention on Human Rights (ECHR), which in turn, is incorporated into UK law through section 6 of the Human Rights Act 1998.

The EHRC states, 'Everyone's right to life shall be protected by law. There is a negative obligation on the authorities not to interfere with the right to life. There is also a positive duty to enable people to enjoy their right to life through, for example, enforcing criminal laws, regulating the delivery of public services and taking steps to avoid accidental deaths.'

The state's obligation to protect life includes, as a matter of priority, the protection of people whose lives have been placed at particular risk because of specific threats, or are living in particular circumstances. This would include, for example, victims of domestic violence, children living on the street, homeless people, refugees, or lesbian, gay, bisexual and trans (LGBT) people. Disabled people are entitled to special measures of protection, to ensure that they can enjoy the right to life on an equal basis with others. The need for additional protective measure to meet the needs of particularly vulnerable people, in relation to policies should be considered.

The risk to vulnerable occupants will be considered throughout the options appraisal process and engagement with stakeholders will play an important part in this, as will the potential review of any exemptions.

There is an opportunity to make a positive impact on vulnerable communities through the provision of advice on fire safety to duty holders reflecting the specific requirements of the additional protective measure to meet the needs of particularly vulnerable people.

Article 8, the Right to Privacy and Family Life: Guidance and support has been and will continue to be sought from Information Governance Team to ensure full compliance with GDPR regulations and Data Protection.

Children's Rights: Children's rights are unique in that many of them, although designed for the safety and protection of children, have to be provided for by adults. Children's Rights will be considered, where relevant, through this option appraisal process.

Concluding Part 2

Outcome of Establishing Relevance	Please Tick	Next Steps
There is no relevance to Equality or the Human Rights Act 1998	<input type="checkbox"/>	Proceed to Part 4 Monitoring
There is relevance to some or all of the Equality characteristics and/or the Human Rights Act 1998	<input checked="" type="checkbox"/>	Proceed to Part 3 Impact Assessment
It is unclear if there is relevance to some or all of the Equality characteristics and/or the Human Rights Act 1998	<input type="checkbox"/>	Proceed to Part 3 Impact Assessment

**PART 3
IMPACT ASSESSMENT**

Describe and reference:

- relevant issues
- evidence gathered and used
- any relevant resolutions to problems
- assessment and analysis
- decision about implementation
- justification for decision
- potential issues that will require future review
- the results of any consultation required

Characteristic	
Age	<p>Older adult: Older adults as they are more likely to live in sheltered or managed accommodation.</p> <p>At 31 March 2019, there were an estimated 30,914 long stay residents in care homes for older people. Of these, an estimated 19,590 had dementia (either medically or non-medically diagnosed).</p> <ul style="list-style-type: none"> • Care homes may also provide short term or respite care. At 31 March 2019, there were 1,531 residents in a care home for these purposes – an increase of 49% compared with 31 March 2009 (1,029). <p>During the period of 2019 to 2020 57 AFAs in residential homes resulted in fire.</p> <p>Care homes provide residential care for the most vulnerable people in society and there is an opportunity to make a positive impact on the grounds of age through the provision of advice on fire safety to duty holders reflecting the specific requirements of the residents who may not be able to identify risk on their own, may be subject to greater levels of distress or confusion than the general population, may have physical/sensory/mental impairments that impact on their ability to move to safety unassisted and there may be materials present such as oxygen that contribute to the spread of fire.</p> <p>Student Accommodation: As it relates to individuals living in halls of residence or Houses of Multiple Occupation (HMOs). During the period of 2019 to 2020 47 AFAs at student accommodation resulted in fire.</p> <p>Boarding school accommodation: As it relates to children and young people who reside in boarding schools across Scotland. In 2020 there were 28,724 pupils in 71 independent schools - 4% of pupils in Scotland. There are 19 mainstream boarding schools with 2606 pupils – 35% of boarders are from overseas.</p> <p>Young Offenders: Young Offenders who are residing within young offender institutions that provide custodial facilities for 16–21year olds (or older in exceptional circumstances with the Governor of the establishment’s agreement).</p> <p>All of the above are classed as ‘sleeping risk’ premises under the exemption element of options A & C. and will therefore receive an immediate response to all AFA actuations. Furthermore, the proposals will not affect how SFRS</p>

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	<p>respond to calls from AFAs that are real fires. If there is a confirmed fire, SFRS will respond as it normally would for any emergency.</p> <p>The SFRS will continue to provide advice through its Fire Safety Enforcement business as usual practices, but the project acknowledges that a wider Communications piece may be required around the implementation of the chosen option.</p>
Caring Responsibilities	<p>Care Experienced: At 31 July 2019, there were an estimated 14,015 care experienced children and young people in Scotland in various types of care setting. 10% of these young people were in a residential care home.</p> <p>During the period of 2019 to 2020 57 AFAs in residential homes resulted in fire.</p>
Disability	<p>Disability: Relevant to individuals with a disability who are living within residential accommodation.</p> <p>On 31 March 2019, there were 159 care homes for learning disabilities providing 1,587 places, 55 care homes for mental health problems providing 978 places, and 41 care homes for physical and sensory impairment providing 666 places.</p> <p>On 31 March 2019, the estimated percentage occupancy in care homes for learning disabilities was 89%, and was 92% in care homes for mental health problems, and physical and sensory impairment.</p> <p>Source: Care Home Census for Adults in Scotland 2009 - 2019</p> <p>Individuals with a sensory/mental/physical impairment or disability may have difficulty identifying risk or removing themselves unaided from potentially dangerous situations.</p> <p>Due to the level of risk, Care Home Services, Hospitals, Private Hospitals and Hospices which provide inpatient care are already audited by the SFRS annually. Newly registered Care Home Services are audited within seven working days of becoming operational.</p> <p>During the period of 2019 to 2020 57 AFAs in residential homes resulted in fire.</p> <p>All of the above are currently classed as ‘sleeping risk’ premises under the exemption element of options A & C and will therefore receive an immediate response to all AFA actuations. Furthermore, the proposals will not affect how SFRS respond to calls from AFAs that are real fires. If there is a confirmed fire, SFRS will respond as it normally would for any emergency.</p>
Gender Reassignment	<p>May have potential relevance to individuals requiring medical in hospitals as part of their transition process.</p>
Marriage and Civil Partnership	<p>There is no relevance in relation to marriage and civil partnership.</p>
Pregnancy and maternity	<p>Pregnancy: Relevant for individuals who are pregnant as they are more likely to require medical care in hospitals. During the period of 2019 to 2020 68 AFAs in hospitals resulted in fire.</p>

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<p>Race</p>	<p>Asylum Seekers: Relevant to individuals who are seeking asylum and living within residential accommodation. Individuals within this group may have interconnected risk factors such as communication barriers, personal isolation, mental health conditions, be socially and economically disadvantaged or may be unaccompanied young people living in unsupported accommodation.</p> <p>Asylum support accommodation is subject to the same law and regulation in relation to fire safety and overcrowding, health and safety, houses in multiple occupation etc. as any other accommodation.</p> <p>Duty holders have a responsibility for ensuring that their employees understand fire safety information as it is relevant to them and also for displaying relevant safety information for their customers’.</p> <p>The SFRS does not have current and accurate data on the ethnic profile of individuals and Asylum support accommodation involved in fire incidents</p> <p>The SFRS will provide alternative formats and different languages to the key messages on request.</p> <p>Asylum accommodation is currently classed as ‘sleeping risk’ premises under the exemption element of options A & C and will therefore receive an immediate response to all AFA actuations. Furthermore, the proposals will not affect how SFRS respond to calls from AFAs that are real fires. If there is a confirmed fire, SFRS will respond as it normally would for any emergency.</p>
<p>Religion and Belief</p>	<p>There may be a sleeping risk as it relates to monasteries or convents.</p> <p>Places of worship are not deemed as high risk, partly due to the fact that there is no sleeping risk.</p> <p>The SFRS understands that a fire at a place of worship can have a wider impact on a community, particularly if a fire related hate crime.</p>
<p>Sex (gender)</p>	<p>Refuge Accommodation: A refuge is a safe place for women and children to escape from domestic abuse. Generally, only women are permitted inside. Refuges vary from area to area. Some are shared houses, while others offer self-contained apartments.</p> <p>Relevant refuge accommodation is currently classed as a ‘sleeping risk’ premises under the exemption element of options A & C and will therefore receive an immediate response to all AFA actuations. Furthermore, the proposals will not affect how SFRS respond to calls from AFAs that are real fires. If there is a confirmed fire, SFRS will respond as it normally would for any emergency.</p>
<p>Sexual Orientation</p>	<p>There is no evidence of a direct or indirect relationship between sexual orientation and UFAS activity.</p>
<p>Social and Economic Disadvantage</p>	<p>The maintenance of businesses within communities has a beneficial impact on local communities in the financial well-being and social vibrancy of an area. This can be particularly important in the preservation of heritage sites which can provide the most important financial and social hub for the local community.</p>

	<p>RVDS Employees: There is a potential negative financial impact for RVDS employees should the number of turnouts to AFAs be less. There is also a potential positive impact on RVDS, where less call-outs will enable a better work/life balance and reduce the impact on their primary employers.</p>
<p>Human Rights</p>	<p>Please see section above on human rights.</p>
<p>Impact on people in general not covered by specific characteristics</p>	<p>The average time spent by fire crews at UFAS incidents is 30 minutes, with an average of 2 fire appliances at every incident. This means an estimated 57,000 unnecessary blue light journeys every year. High levels of UFAS demand are therefore having an impact on the SFRS and the communities of Scotland.</p> <p>For communities this includes:</p> <ul style="list-style-type: none"> • Disruption of business (time wasted, loss of business). • Disrupts customer activities, causes inconvenience to residents. • Causes complacency by being treated as ‘just another false alarm.’ • Cost to local businesses when RVDS are released from work to attend a UFAS. • Impact on the environment due to unnecessary appliance movements, and • A drain on public finances. <p>For the SFRS this includes:</p> <ul style="list-style-type: none"> • Diverting essential services from real fires and rescues (putting lives at risk). • Unnecessary road risk to fire crews and the public while responding (accidents). • Disruption to training, fire safety and community safety engagement activities (education saves lives) • Direct cost of responding (fuel used and payments to RVDS for being called-out to attend). <p>Island Impact Assessment: Depopulation is a threat to many of Scotland's island communities. Over the last 10 years, almost twice as many islands have lost populations as have gained. Socio-economic concerns may impact on island communities in relation to depopulation.</p> <p>As highlighted above, there is the potential of negative financial impacts on RVDS due to decreased turnouts.</p> <p>The stakeholder event on the 24th February highlighted concerns that there could be an increased risk for island and rural areas if response times were longer and that fewer call outs could have a detrimental financial impact on Island employees.</p> <p>It was also raised that the listed benefits would differ depending on geographical location. Reduced demand on the Central Belt may hold potential positive impacts, whereas fewer call out in remote/rural areas may risk station closures.</p> <p>Crew Welfare: Through an online survey to review COVID-19 interim AFA response arrangements and a series of staff engagement sessions, where staff shared their views on the future direction of the service, there is evidence</p>

	<p>that staff feel the Service can make better use of resources by changing the response and stopping/reducing UFAS incidents.</p> <p>At the Stakeholder event held on the 24th February, there were concerns raised about 'morale' and the obligation both Ops Control and Crews may feel if no longer responding to situations where there could be a fire.</p> <p>Firefighter safety was also raised, where crews may end up attending a well developed fire due to delayed attendance.</p>
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Summary and Conclusion of Impact Assessment

To meet the requirements of the Public-Sector Equality Duty, the Service must be able to demonstrate that the options appraisal and final business case for decision has had due regard to the equality duty. This should include considerations to eliminate discrimination (including harassment and victimisation), advance equality and foster good relations around the protected characteristics as detailed within the Equality Act 2010. These protected characteristics are:

- Age
- Disability
- Gender
- Gender Reassignment
- Religion or Belief
- Race
- Pregnancy and Maternity
- Marriage and civil partnership

It should be noted that the Service also considers caring responsibilities, socio-economic disadvantage and Scottish Island impacts alongside the nine protected characteristics within the Equality Act 2010.

The SFRS has started the Equality Impact Assessment (EIA) process that will provide us with a better understanding of the potential impacts (both positive and negative) on the above groups. In turn, this will assist the Service in making evidence based and informed decisions around the evaluation of models for responding to AFA's at non-domestic premises and a final business case that will go to the SLT and the Board.

Consultation and Communications Plan: A Strategy has been developed, which has included a stakeholder mapping exercise to ensure we reach as many of our target audiences as possible throughout the process. We will consider the most suitable methods of communication appropriate to our target audiences, applying the Principles of Inclusion Communication in order to address the needs of people of all ages, people from different cultural and language backgrounds, and disabled people. This has been considered and documented within the Consultation and Communication Plan Equality Impact Assessment that can be accessed [here](#).

Stakeholder Options Appraisal Workshop: On 24 February, a total 42 staff and stakeholders classified as high influence/high interest, participated in a Zoom online workshop. The purpose of the workshop was to evaluate the benefits and risks of five shortlisted options for responding to AFA's. To achieve this, the options were evaluated against set assessment criteria, then scored and ranked by the participants.

As stated in this EIA, stakeholder engagement to date has detailed the welfare of SFRS employees as a concern and highlighted the potential differences for the Scottish Islands and other rural areas.

The results from the workshop enabled an overall scoring and ranking of the five options and the following conclusions to be drawn.

- Options 1 and 2 did not deliver a significant or, in the case of Option 1, any benefit to the Service.
- Options 4 and 5 were identified as delivering the most benefit in terms of UFAS reduction but also carried the highest risk.
- Option 3 offered a middle ground.

As Options 3, 4 and 5 can deliver a significant reduction in UFAS, these are the options SFRS are consulting on.

The current options for public consultation are therefore as follows:

Option A (3): Call challenge all AFA’s from non-domestic premises. No response is mobilised, if questioning confirms there is no fire, or signs of fire. Sleeping risk premises are exempt from call challenging and will receive the following immediate response:

Residential Care Homes receive 2 fire appliances regardless time of day.

All other sleeping risks receive one fire appliance between 0700-1800hrs and two fire appliances out-with these hours.

Option B (4): Call challenge all AFA’s from non-domestic premises. No response is mobilised, if questioning confirms there is no fire, or signs of fire. No exemptions to call challenging apply (i.e. all AFA calls received are call challenged, regardless of premises type and caller).

Option C (5): Non-attendance to all AFA’s from non-domestic premises, unless back-up 999 call confirming fire, or signs of fire is received. Sleeping risk premises are exempt from non-attendance and will receive the following response:

Residential Care Homes receive 2 fire appliances regardless time of day.

All other sleeping risks receive one fire appliance between 0700-1800hrs and two fire appliances out-with these hours.

Call Challenging

Call Challenging is where an Operations Control (OC) operator asks the caller a series of questions and following set criteria, determines whether an emergency response is required following an AFA actuation. No response is mobilised, if questioning from the OC operator confirms there is no fire, or physical signs of fire.

Stakeholders who attended the Options Appraisal Workshop, felt there was a need for more detail around the call challenge process being applied to Options A & B. The benefits and potential risks of call challenging, and SFRS comments are outlined below.

Benefits	Potential Risks
One of the best ways that a fire service can establish whether or not to respond to a call from an AFA is by speaking to someone at the premises concerned.	<p>Will it take longer to get to an incident so potentially impact crews and communities?</p> <p>Statistics across the UK have identified no detrimental effect on incident outcomes. Resources are more readily available at the point of need to respond to real emergency situations potentially improving outcomes.</p>
Our fire control operators can ask relevant questions of the responsible person at the premises and, if then necessary, send the appropriate number of fire engines to save life and protect property.	<p>What if it’s a silent call?</p> <p>We would attempt to re-contact the caller and if unsuccessful treat as unknown in terms of response and mobilise in accordance with the exemptions.</p>

<p>Other FRSs within the UK are already using Call Challenging effectively.</p>	<p>What if an individual is stressed/upset and unable to provide clear information?</p> <p>This would be treated as an unknown in terms of response and we would mobilise in accordance with the exemptions.</p> <p>What if the person doesn't speak English?</p> <p>This would be treated as per existing policy and practice and an interpreter would be utilised if required.</p>
<p>Call Challenging is not very different to what the SFRS do already. We currently ask a series of questions to determine mobilisation. It would be the response to the call challenge that would change rather than the process.</p>	<p>Stakeholders have raised that the term 'call challenging' has negative connotations. This will be considered through the consultation process.</p>

Exemptions

The Scottish Fire and Rescue Service (SFRS) encompasses a diverse and growing environment for partners including the care sector, businesses, heritage and industry where we welcome residents, tourists and commuters alike to our non-domestic premises.

The development of any potential exemptions through this process, has been focussed on premises where greatest risk to life may exist. It was highlighted at the Stakeholder Options Appraisal Workshop on 24th February, a one size fits all approach may not be appropriate. Other factors such as time of day have also been explored.

Under Options A & C, the exemptions in relation to sleeping risk are:

- Boarding House/B&B for homeless/asylum seekers
- Boarding House/B&B other
- Boarding School accommodation
- Children's Residential Home
- Hospital
- Prison
- Student Hall of Residence
- Youth hostel
- Military/barracks
- Monastery/convent
- Hostel (e.g. for homeless people)
- Hotel/motel
- Nurses'/Doctors' accommodation
- Nursing/Care Residential Home
- Other holiday residence (cottage, flat, chalet)
- Other Residential Home
- Retirement/Old Adult Residential Home
- Young offenders' unit

In options A & C, this means certain sleeping risk premises will be exempt from the call challenging process or non-attendance and an immediate response would be mobilised for all AFA calls received. The number of appliances mobilised would be determined by time of day and premises type, but would not be a full emergency response as would happen if a fire was confirmed.

Public Consultation: A public consultation on the options for responding to AFA actuations will run for 90 days from 19 July 2021. Supported by the Communications and Engagement Team (CET), a plan has been developed to deliver the consultation process targeted at both external and internal stakeholders to raise awareness of the options and maximise responses.

The Consultation Institute advised developing the 3 options further and where possible eliminating the use of jargon. In this vein, a covering paper and 3 Equality Impact Assessment Executive Summaries have been developed and can be found alongside this EIA.

This Equality Impact Assessment will continue to be updated as the internal and external consultation process progresses.

Concluding Part 3

Impact Assessment	Please Tick	Next Steps
There is no relevance to Equality or the Human Rights Act 1998	<input type="checkbox"/>	Proceed to Part 4 Monitoring
There is relevance to some or all of the Equality characteristics and/or the Human Rights Act 1998 and relevant actions are recorded above in Summary and Conclusion	<input checked="" type="checkbox"/>	Proceed to Part 4 Monitoring

PART 4 MONITORING & REVIEW

- The purpose of this section is to show how you will monitor the impact of the function/policy.
- The reason for monitoring is to determine if the actual impact of the function/policy is the same as the expected and intended impact.
- A statement on monitoring is required for all functions/policies regardless of whether there is any relevance to Equality or the Human Rights Act.
- The extent of your answer will depend upon the scope of the function/policy to impact on Equality and Human Rights issues.

If you have provided evidence or justification for believing there is no relevance to Equality or the Human Rights Act in Section 2 Establishing Relevance or Section 3 Impact Assessment:

Q1 How do you intend to monitor and review the function/policy?

Through the process of stakeholder mapping, groups classified as high influence/high interest were invited to attend an online stakeholder engagement event on 24 February and to evaluate options for responding to AFA actuations that have the potential to reduce the impact of UFAS. Representation included staff from the SFRS, the Fire Brigades Union (FBU), the Fire Safety Industry, the NHS, Business and the Higher/Further Education sector.

Prior to the event, stakeholders were provided with an information booklet and a detailed information pack, providing context to the options identified and guidance to help them prepare and fully participate in the process of evaluating each option.

A public consultation on the options for responding to AFA actuations will run for 90 days from mid-July. Supported by the Communications and Engagement Team (CET), the working group have developed a plan to deliver the consultation process targeted at both external and internal stakeholders to raise awareness of the options and maximise responses.

If you have provided evidence or justification for believing there is relevance to Equality or the Human Rights Act:

Q2 What will be monitored?

To meet the requirements of the Public-Sector Equality Duty, the SFRS must be able to demonstrate that the agreed strategic and operational approach has had due regard to the equality duty.

Through the consultation exercise, the SFRS will gather data and evidence around the potential viable options and impacts (both positive and negative) of the development and introduction of new policies and practices.

This will enable the SFRS Board to consider and be influenced by the responses to the consultation from a range of stakeholders and interested parties and with other relevant information and research data, agree a strategic and operational approach which will be safe, effective and sustainable whilst maximising the use of the service's resources to continue to minimise the risk to Scotland's diverse communities and firefighter safety.

Q3 How will monitoring take place?

Through on-line surveys, workshop exercises and internal and external consultation.

Q4 What is the frequency of monitoring?

On-going

Q5 How will monitoring information be used?

To determine the potential options that will allow a reduction in UFAS.

**PART 5
APPROVAL**

This Equality and Human Rights Impact Assessment was completed by:

Name	Roy Dunsire
Date	03.06.21

This Equality and Human Rights Impact Assessment was approved by:

Name	Denise Rooney
Date	03.06.21