WEST MIDLANDS FIRE AND RESCUE AUTHORITY

5 OCTOBER 2020

1. ## INTEGRATED RISK MANAGEMENT PLAN CONSULTATION

Report of the Chief Fire Officer.

RECOMMENDED

THAT Members note the engagement strategy for the consultation of the Integrated Risk Management Plan (IRMP) in October 2020 and the themes and questions to be consulted upon.

2. ## PURPOSE OF REPORT

This report is submitted to inform Members of the consultation of West Midlands Fire and Rescue Authority's (WMFRA) IRMP commencing in October 2020 as part of the preparation of our three-year rolling strategy, The Plan 2021-2024.

3. ## BACKGROUND

3.1 Under the National Fire and Rescue Framework, West Midlands Fire and Rescue Authority (WMFRA) has committed to consult on our IRMP every three years, or where there is a material change to this risk assessment. WMFRA is committed to enabling the wider community to understand the strength in the risk-based approach to the delivery of services across the West Midlands and to understanding the public's expectation of their Fire Service.

3.2 With the ongoing COVID pandemic we have seen the national environment shift significantly since March 2020. This has seen staff at West Midlands Fire Service (WMFS) ready, willing and able to respond to the challenges the pandemic has provided and in particular deliver additional activities to the communities of the West Midlands, including the delivery of essential items and medical packages to the most vulnerable members of our communities.

3.3 Since the last WMFRA consultation took place in 2016/17 there have been a number of national and local reports and inspections that have been undertaken:

- Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) independent assessment of the effectiveness and efficiency of all fire and rescue services;
- State of Fire and Rescue: The Annual Assessment of Fire and Rescue Services in England 2019; and
- The NFCC, National Employers (England) and LGA 'Fit for the Future' report 2020

These are likely to change the way Fire and Rescue Services operate and deliver services to communities in the future.

3.4 It is therefore an appropriate time for WMFRA to complete an effective, informative and meaningful consultation with our communities, partners and businesses across the West Midlands region. This will be achieved by adopting the 'Gunning Principles':

- proposals will be at a formative stage
- there will be sufficient information for respondents to give 'intelligent consideration'
- there will be adequate time for respondents to give consideration and response
- 'conscientious consideration' will be given to the consultation responses before a decision is made

4. **IRMP CONSULTATION APPROACH**

4.1 WMFRA takes a risk based approach towards its decision making around the IRMP. The consultation will provide an opportunity to present the evidence base behind our Service Delivery Model (SDM) to our communities and partners to determine whether our approach is supported. In addition to this, the consultation will seek to engage members of the public about emerging areas of identified risk and how we plan to mitigate against these risks.

4.2 It is proposed that WMFRA consult on four themes during the consultation. The proposed themes and questions are detailed in Appendix 1. For each theme, evidence will be provided to enable

the respondent to make informed decisions when providing feedback.

4.3   It is proposed that the consultation will run from 7 October until 16 December 2020. The outcomes of this consultation will have a direct impact on the development of The Plan and therefore consideration has been given to the strategic planning timelines, in developing and presenting 'The Plan' to the Fire Authority.

4.4   The IRMP consultation will aim to engage a broad range of demographics in line with the diverse communities we serve, which will include partners and businesses. In recognition that one of our COVID-19 strategic outcomes is to 'Return to the new normal with a healthy workforce' and also supporting both government and WMFS guidance, the consultation will be predominantly digitally based although printed copies will be available (in a secure and safe environment) upon request.

4.5   We aim to gather the greatest range of information possible from the consultation which can be used to inform our existing approaches and when seeking to influence externally.

5.   **ENGAGEMENT STRATEGY**

5.1   When shaping our services to manage risk, we are committed to meaningful consultation and engagement with the community we serve.

5.2   It is our intention to make the consultation as accessible as possible to respondents by utilising as many platforms that are available to us, whilst also ensuring that all our staff are kept as safe as possible during this pandemic. To make this process as seamless as possible all relevant material will be available at www.wmfs.net.

5.3   To enable as much of a representative response as is possible from our diverse communities, partners and businesses it is hoped that a wide range of views and opinions will be collected. The different engagement proposals, as shown below, will achieve both qualitative and quantitative results:

- wmfs.net based (multi language)
- social media campaigns

- targeted businesses (high risk audits)
- safe and well visits (high risk)
- partners
- community members
- WMFS staff/network groups
- Fire Authority members
- printed copies (upon request)
- digital community messaging system (WM Now)

5.4   Engagement with members of our communities will require the support of all SET members to help embed, drive and push awareness. Authority members, in their role as ambassadors and leaders, will have a key role in ensuring their constituents and communities are made aware of the consultation. A stakeholder analysis and engagement plan can be found at Appendices 3 and 4.

5.5   Our updated CSS tool will allow us to target our social media followers/friends both at a corporate and team or station based account, with consultation questions that are most likely to pique the curiosity or interest of the individual or organisation. It will also allow users to explore our IRMP and demonstrate our commitment to providing open and transparent information to the communities of the West Midlands.

6.   **EQUALITY IMPACT ASSESSMENT**

In preparing this report a full Equality Impact Assessment has been undertaken and can be found in Appendix 2

7.   **PRIVACY IMPACT ASSESSMENT**

In preparing this report a full Privacy Impact Assessment has been undertaken and can be found in Appendix 5

8.   **LEGAL IMPLICATIONS**

The consultation proposed in this paper meets the Authority's requirements under the National Fire and Rescue Framework for England 2012.

9. **FINANCIAL IMPLICATIONS**

Costs incurred for digital messaging systems, printed copies, online advertising etc. are estimated to be approximately £15k. Funding for this has been provided as part of the Authority's 2020/21 budget arrangements.

BACKGROUND PAPERS

State of Fire and Rescue: The Annual Assessment of Fire and Rescue Services in England 2019
https://www.justiceinspectorates.gov.uk/hmicfrs/publications/state-of-fire-and-rescue-annual-assessment-2019/

The NFCC, National Employers (England) and LGA 'Fit for the Future' report 2020,

https://www.nationalfirechiefs.org.uk/write/MediaUploads/NFCC%20meetings/2020/May/Item_9_-_Appendix_C_-_Fit_for_the_future.pdf

The contact name for this report is Mark Hamilton-Russell, telephone number 07973 840246

PROPOSED THEMES AND QUESTIONS

Response

We aim to get to the most serious incidents, in areas of high risk, within five minutes.

From our research, with academics and doctors, we know that getting to you quickly in an emergency – such as a fire or traffic collision – increases your chances of survival. It also saves homes and businesses.

We combine this knowledge with what we know about risk across the West Midlands to plan where we need our people and resources, including our fire stations, engines and more specialist resources. It also lets us plan how we deliver our prevention and protection services.

Our Government funding has been cut by £38m over the last ten years, so we've had to adapt how we work.

For example, whilst we have 41 fire engines and 19 Brigade Response Vehicles for our emergency work, we vary which of them are crewed based on what we know about risk at different times of day and night.

We've worked hard to ensure that this approach has a minimal impact on our five-minute attendance standard. However, having fewer firefighters on duty at certain times means they're not then available to deliver services like the prevention work we do to keep people safe at home. This also comes at a time where extreme weather events are becoming more common place, terror events in the UK have become more frequent and we are in the middle of a world-wide pandemic. We are having to deal with a greater diversity of risk than ever before.

So we need to find new, sustainable ways of driving down risk in the community.

This could involve developing and adopting innovative technology, or new vehicles designed so that each one could provide our broad range of prevention, protection and response services.

Such flexibility could open up new ways of how we plan our work and configure our resources, including more specialist teams which we have to respond to specific risks and threats.

Question: To what extent do you agree that we should continue to adopt flexible approaches to managing our resources?

- Strongly disagree
- Disagree
- Neither agree or disagree
- Agree
- Strongly agree

Free Text Box
Please tell us why…

Prevention
Digital approaches

Our 'Safe and Well' visits are the main way we work with people to keep them safe at home.

Our visits focus on general fire safety, as well as any health and wellbeing factors which could increase someone's risk of having a fire. These include living alone, smoking and being vulnerable to having a fall.

There are close links between someone's vulnerability to poor health and their risk of having a fire. By identifying these underlying causes of increased risk of fire, we have the potential to really improve people's safety and quality of life. In turn, this could reduce demands on the health and social care sectors.

During the COVID-19 pandemic, our ability to deliver Safe and Well visits has been badly hit by the need to maintain social distancing. Coronavirus has meant we've had to explore how to use technology and take a digital approach to a lot of our work.

We believe that a digital approach could help us drive down risk in our communities. It would help us make the best use of our resources, to deliver prevention services to more people in more targeted and tailored ways. Face-to-face engagement will still be available to the most vulnerable in our communities, while a range of options would be available for delivering Safe and Wells to others, dependant on their level of vulnerability - including ''virtual' and online Safe and Wells and telephone consultations.

Question: To what extent do you agree with the use of technology and digital solutions to complement our face-to-face engagement and delivery of our Safe and Wells?
- Strongly disagree
- Disagree
- Neither agree or disagree
- Agree
- Strongly agree

<u>Free Text Box</u>
Please tell us why…

Causes of Causes

By tackling the underlying reasons for someone being at greater risk of fire, we can make a real difference to their safety and quality of life.

Our focus on the 'causes of the causes' can involve working closely with partner organisations to reduce someone's risk of fire and of other emergencies, by improving their health and wellbeing.

During the COVID-19 pandemic we've supported our communities with a range of extra activities. This has included the delivery of thousands of food and medical parcels to those most at risk from coronavirus.

The longer-term impacts of COVID-19 are likely to include greater poverty, unemployment and health issues. These are all linked to people being more at risk from fire.

Hundreds of our staff volunteered for the extra pandemic activities, and we know there's a genuine willingness to build on this work to reach and

keep safe more of our communities than ever before.

Question: Even though this may not fall within the traditional roles and responsibilities of a fire and rescue service, to what extent do you agree that West Midlands Fire Service should be tackling the wider social issues that make people more vulnerable to fire and other risks?

- Strongly disagree
- Disagree
- Neither agree or disagree
- Agree
- Strongly agree

<u>Free Text Box</u>
Please tell us why…

Protection

Fire and Rescue Authorities must put arrangements in place for extinguishing fires, and for protecting life and property when fires occur.

There is no legal duty for fire and rescue services to respond to alerts from Automated Fire Alarms. Yet Automated Fire Alarms accounted for just over 15 per cent of our calls last year, and more than 96 per cent of these were false alarms.

Responding to a false alarm costs public money. It potentially diverts our crews away from a genuine emergency, from their prevention or protection work, or from training. It also increases the risk to members of the public and our crews as they respond on blue lights to provide a timely response

In some circumstances when our fire control receive a call from an Alarm Receiving Centre, they'll use the information provided to decide whether or not to send a response.

Our work with businesses helps to keep them in business, supporting economic growth. In 2015, we introduced Business Support Vehicles. One aspect of their work is responding to Automated Fire Alarms, which gives our Business Support Officers opportunity to work with businesses to reduce the impact of Automated Fire Alarms and to provide business safety advice. This frees up our Fire Safety Officers to work on more complex, higher-risk projects.

Although a high proportion of Automated Fire Alarms result in a false alarm, there is still the risk that it is a result of a fire.

We are exploring how we manage this risk differently, developing our response to Automated Fire Alarms. This will involve us looking at the types of resources we send, through to how we can provide a digital response to the business community, maintaining opportunities for engagement and ensuring maximum value for all.

Question: In supporting businesses to comply with their fire safety responsibilities, to what extent do you agree with us developing alternative approaches to responding to Automated Fire Alarms?

- Strongly disagree
- Disagree
- Neither agree or disagree
- Agree
- Strongly agree

Free Text Box

Please tell us why…

Funding

In earlier sections of this consultation we have explained how we organise and deliver our services to provide the most effective emergency response possible, whilst working to reduce community risk with our prevention and protection activities.

We have also set out some of the steps we have taken to work more innovatively, flexibly and digitally.

Since 2011, We have managed cuts of £38m in our Government funding and this has led to us work differently as we strive to deliver the same, or more, for less. The financial impact of Covid19 may remain unknown for some time, but further reductions in our budget are anticipated which, combined with receiving less money via Council tax and Business rates, might mean further changes in how we deliver our services.

Whilst the COVID-19 pandemic has presented many challenges, it has also provided opportunities for us to explore new ways of working. Investment in digital ways of working has helped those staff who can, to work from home and stay safe. It has also led to efficient ways of working.

We need to understand how different ways of working could minimise the impact of further funding cuts on the delivery of our services to our communities. These different ways could, for example, include:

- enabling those of our staff who can, to continue working from home
- using our buildings and land differently, to create savings or income
- being more flexible in how we staff our fire stations
- introducing new types of vehicles to support a more flexible way of responding to incidents
- looking for new sources of funding.

It is difficult to predict exactly what will be required but planning for various scenarios will enable us to consider the widest range of options, in delivering the highest quality services to our Communities, within a balanced budget.

We would like to hear your views on these options once developed and will look to gather these before we make any decisions.

Question: Do you support us in planning for this now?

If 'yes', how would you like us to consult you on our future financial planning options?

- I Don't
- via our website
- social media
- Email
- Focus groups
- Post
- WMnow

<u>Free Text Box</u>

If you would like to comment further on any of the questions above, please do so here.

Question before Equal Opportunities questions...
If you would like to be kept up to date with future consultations, please enter your email address....

Full Equality Impact Assessment 2020

A detailed equality impact assessment for a project, policy or procedure which will have a wide scale impact on a team(s) or on service delivery, also useful for a project which is likely to have a range of equality benefits and can be used as best practice.

1. Name of project, policy or procedure	
WMFS IRMP Consultation 2020/21	
2. Directorate/ team this project or policy is owned by	
Corporate Communications	
3. Project lead	
Mark Hamilton Russell	
4. EIA author	
Mark Hamilton Russell	
5. Is this a new or existing policy or project?	
Existing	
6. When is this project due for implementation/ completion?	
Implementation 7 October 2020 Completion 16 December 2020	
7. Please set a date to review this project	
Consultation will take place every three years	
8. What are the aims / outcomes of the project/ policy?	
To inform the public of the opportunities available to them to take part in the consultation with the aim of achieving a representative	

response from our diverse communities, partners and businesses to ensure a good range of views and opinions are collected. Meaningful responses which can be used by a range of teams across WMFS when delivering Our Plan and for consideration by the Chief Fire Officer and SET when re-shaping the 3 year rolling strategy.

The above will need to be achieved and take account of the challenging context presented by the ongoing pandemic, including impacts on both our communities and staff.

Taking into account the above our approach to this consultation will be digital first supported by paid-for promotion.

Impacts

This section is for you to demonstrate due consideration of consider any impact of your project, policy or procedure. **You must** provide data to evidence that you have researched the possible impact of your policy on employees and/or the community. Your data collection must be robust, and you must show evidence that you have analysed any potential impact or trends. Workforce Planning can help provide data if needed and support and guidance is available from the DICE team. **DO NOT** identity individuals.

9. Have you identified any impacts due to race, ethnicity or national identity?
Yes It is important we are consulting with all of our communities. We will seek to put channels in place to ensure we can reach all

our communities with an emphasis on hard-to-reach areas. This is not as simple as providing alternative languages, but assisting with filling in consultation through families, interpreters, reaching areas such as Asian businessmen and women, those at higher risk of fire from minority groups.

10. Have you identified any impacts due to gender, including gender identity, transgender and non-binary gender identity?	
No *If yes detail here*:	
11. Have you identified any impacts due to disability, including mental health, learning difficulties, and those on the Autistic spectrum?	
Yes We will be collecting data on protected characteristics within the consultation as we did in the 2016 consultation. We will also ensure the consultation is DDA compliant.	
12. Have you identified any impacts due to Religion or Philosophical belief, including any non-main stream faiths?	
No We will be collecting data on protected characteristics within the consultation as we did in the 2016 consultation	
13. Have you identified any impacts due to age? This includes any impact on those 18 years old and above	
Yes Lack of online access or IT skills, particularly among the elderly who are often at a higher risk from fire. Please see engagement plan for mitigating measures From statistics gathered from the National Office of Statistics from data available for 2020 18% of those aged 65 + and have not use the internet in the last 3 months	
14. Have you identified any impacts due to sexual orientation? This includes Bi sexual and should **not be** confused with gender identity.	
No	

15. Have you identified any impacts due to maternity/ paternity?	
No	
16. Have you identified any impacts due to an individual's marital status, this includes same sex partnerships?	
No	
17. Who is will to benefit from this project or policy?	
The Communities of the West Midlands will benefit by assisting in shaping our services and how we respond to the communities we serve	
18. Are any individuals or groups likely to be adversely impacted by the project or policy? If so, detail who.	
No	
19. What consultation have you carried out or plan to carry out?	
SET, IRMP Team, Corporate Comms, Fire Authority, Trade Unions	
20. Does this policy or project meet the communities varied needs? (*applicable for polices which impact on the communities we serve and service delivery*)	
The consultation will be clearly communicated to the public in a number of ways (not just online) and consideration would be given to providing in an alternative format if requested. In order to reach our communities across all sections of society, this consultation will be promoted through a variety of staff, contacts and channels as outline in the consultation engagement plan. The results of the feedback will help to inform the future delivery of our services and future IRMP consultation	
21. Does the policy/ activity support WMFS in fulfilling its General duties under the Equality Act 2010. (*not all projects, policy or activity will support but this section allows you to identity best practice/ benefits*)	

The general duties are;
 Advance equal opportunities,
  Foster good relations between different groups,
  Eliminate behaviours deemed to be illegal under the act such as harassment or discrimination	

n/a	
22. Having shown **due regard** to the equality considerations what is your next step? (please select **one** option, if unsure of potential impact please contact a member of the DICE team for further advice. Remember direct discrimination CANNOT be justified under the Equality Act) • Continue the policy /activity despite potential or actual impact • Continue the policy / activity with no major change needed • Adjust the policy / activity to remove or mitigate any adverse impact	
Adjust the policy / activity to remove or mitigate any adverse impact	
23. DICE team comments EIA agreed. Equality data on those who engage will be very useful in informing the requirement for any further measures and evaluating the engagement. The evolving nature of our communities and increased use of social technology present both challenge and opportunity to such large scale consultation. Research done nationally on engagement during the covid crisis for a variety of government departments may provide useful insight to future consultations TDP 1624.0910.20	

Stakeholder Analysis

Stakeholder Name	Contact Person	Qual	Quant	Engagement (how Best to)
SET	All	X		Informal SET paper, PPF, Conversations
Employees	All	X	X	Mesh: CFO updates, Notices, News Items; Middle Managers'/All-Staff briefings, WHVs,
Staff networking groups	Leads	X		Conversations and groups' Teams sites, facilitate virtual focus groups
Retired employees	NARF and payroll/pensions		X	Email, newsletters, payslips, NARF social media
MPs	Individual MPs	X	X	Strategic Hub/Portfolio. E-mail/letter directing to website
Local Authorities	CEOs and Leaders	X	X	Strategic Hub/Portfolio. E-mail/Letter directing to website Operations Commanders Station Commanders
Fire Authority	Individual Members	X		Chair/Strategic Hub. PPF/Email
Home Office		X		Strategic Hub/Portfolio. Conversation/email directing to website
Fire Minister	Kit Malthouse	X		Portfolio. Email/letter directing to website
Shadow Home Sec/Fire Minister		X		Portfolio/Strategic Hub. Letter directing to website
FBU/Unison/ FOA	Local Reps	X		SE Comms

WMCA	PSR Board, Individual workstream leads	X	X	CFO / SET Operations Commanders Station Commanders
WMP			X	DCFO SET
PCC			X	Chair
WMAS			X	CFO (portfolio)
Health and Wellbeing Boards			X	X	Ops Commanders
NHS Trusts			X	X	Ops/station commanders – regular meetings
PHE			X	SET/Prevention
CCGs Staff	Doctors' surgeries, etc			X	Digital engagement plan
Representatives of community and 'hard-to-reach' groups and partnerships formed during pandemic	Authority Members, station-based and prevention/protection personnel, Corp Comms, Community Members/WMNow, Chaplains	X	X	Station Commanders, Networking Groups, Website/Social media, virtual visits, WMNow
Youth	Children and Young People team/Safeside(s)		X	Schools, cadets, youth groups, etc
BAME	Community Members, WMNow	X	X	WMNow/ networking groups
Partners, large businesses/employers and SMEs	Chambers of Commerce, BIDs, LEPs, Business representatives	X	X	Fire Safety. Targeted approach through current channels, Business Education Safety Team (BEST)

Consultation Engagement Plan

What do we want to achieve?	How could we do this?	Who could take responsibility for delivery?
To improve the quantity of responses from the last consultation of the people we engage with	A more extensive stakeholder analysis. Linking from messages on our corporate social media platforms to the online Community Safety Strategy which will host the consultation survey. Adoption of WMNow platform, complementing existing WMFS Community Membership scheme. Proactive, paid-for promotion.	Key stakeholders as outlined in stakeholder analysis.
Collect both qualitative and quantitative responses to inform our IRMP	Using our online Community Safety Strategy to 'host' the consultation survey. Undertaking virtual, online focus groups with the public, partner organisations, local elected representatives, etc.	Local command areas, Local watches SET members/Ops Commanders, Prevention team and staff networking groups, Fire Authority members' online meetings and surgeries.
Improve the diversity of responses	Use of targeting via WMNow and paid-for promotion. Engaging with our staff networking groups and their contacts. ==Multi-language options==	DICE, staff networking groups, Corporate Communications, fire stations, Ops Commanders through Health and Wellbeing relationships,

	Paper copies of survey available on request.	Prevention/partnerships team
Generate consultation responses through social media	Linking from messages on our corporate social media platforms to the online Community Safety Strategy which will host the consultation survey. Our social media messaging will be both free and paid-for/targeted.	Corporate Communications WMFS corporate and station/dept accounts. Encourage staff at all levels within the organisation to share on their personal social media accounts.
Utilise all employees effectively	Via staff engagement channels and Middle Manager/All-Staff briefings	All

Privacy Impact Assessment

Title of project here

Consultation 2020/21

OFFICIAL WMFS- LOW
Ownership: [Ownership]
Date Issued: [Issue Date]
Version: [Version]   Status: [File Status Field]

Revision and Signoff Sheet

Change Record

Date	Author	Version	Comments
14-8-18		2	Update due to new legislation

Approval

Name	Version	Approved	Position	Organisation	Date

Distribution

Name	Position	Organisation

Document Properties

Item	Details
Document Title	Privacy Impact Assessment
Author	Martina Doolan
Creation Date	29/06/2017
Last Updated	

Contents

Contents

1. Privacy Impact Assessments

It is West Midlands Fire and Rescue Service (WMFRS) policy to follow best practice and use Privacy Impact Assessments (PIA) for relevant activities in order to identify and manage any privacy impact risks. This will support compliance with the requirements of the Data Protection Act 2018 (DPA) and Human Rights Act 1998.

Failure to recognise and mitigate adverse privacy impacts could result in reputational damage and possible enforcement action against WMFRS

These questions are intended to help you decide whether a PIA is necessary. Answering 'Yes' to any of these questions is an indication that a PIA must be completed. If this is the case, proceed to Section 2.

Screening Questions	Yes/No
Will the project involve the collection of new information about individuals?	**Yes**
Will the project compel individuals to provide information about them?	**No**
Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?	**Yes**
Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?	**No**
Does the project involve you using new technology that might be perceived as being privacy intrusive? For example, the use of biometrics or facial recognition.	**No**
Will the project result in you making decisions or taking action against individuals in ways that can have a significant impact on them?	**No**
Is the information about individuals of a kind particularly likely to raise privacy concerns or expectations? For example, health records, criminal records or other information that people would consider to be private.	**Yes**
Will the project require you to contact individuals in ways that they may find intrusive?	**No**

2. Privacy Impact Assessment Template

You can start to fill in details from the beginning of the project, after the screening questions have identified the need for a PIA.

2.1 Identify the need for a PIA

Explain what the project aims to achieve, what the benefits will be to the organisation, to individuals and to other parties.

You may find it helpful to link to other relevant documents related to the project.

Also summarise why the need for a PIA was identified (this can be drawn from your answers to the screening questions).

The 2020 IRMP consultation aims to help the communities of West Midlands to understand how WMFS is organised and how we operate and to get valuable feedback.

The public consultation on the IRMP is a part of the organisations three-year rolling strategy and provides the opportunity for our communities to help plan their local service through effective consultation and involvement

The purpose of the proposed consultation will be to engage with local communities, partners and businesses to understand their views and opinions about how The Authority plans to provide its services through the three key priorities of:

a) Response
 b) Prevention
 c) Protection

The consultation proposed meets the Authority's requirements under the National Fire and Rescue Framework for England 2012.

A PIA is required as the consultation will involve the collection of individual's data (this is not a mandatory field) and the information is being collated on behalf of WMFS by an external company Shoothill

As public sector organisation we are required to evidence that we give equality issues due regard, a vital part of this is the collection of data of who we engage with and provide a service for. This enables us to ensure we serve all of communities and make sure there are no unseen barriers to accessing West Midlands fire Service

2.2 Describe the information flows

You should describe the collection, use and deletion of personal data here and it may also be useful to refer to a flow diagram or another way of explaining data flows. You should also say how many individuals are likely to be affected by the project.

The data collected during the 2020 consultation period will primarily be with a digital/online focus with paper copies being distributed upon request.

The online data collected will be collated by the external company (Shoothill) via the CSS application and will be stored and collated in a secure SQL database. This data will then be surfaced to specified Administrators for reporting in a hidden, password protected admin section within the application.

Access to this information will be restricted to, Other than WMFS, there are two processors with access to the data in Shoothill and Microsoft. Shoothill will only ever access the data with WMFS permission, and it will only be if absolutely necessary. Shoothill will always use dummy data for testing purposes and replicating any support calls from WMFS. Microsoft follow their Azure Security Policy, which highlights these three main points:
•   No access to customer data, by default.
•   No user or administrator accounts on customer virtual machines (VMs).
•   Grant the least privilege that's required to complete task; audit and log access requests.
You can read more here:
https://docs.microsoft.com/en-us/azure/security/fundamentals/protection-customer-data
Link to all Azure security documentation:
https://docs.microsoft.com/en-us/azure/security/

Once collected this information is stored using Locally Redundant Storage (LRS), which means our storage is replicated 3 times within a single Azure facility. All of our storage stays within the UK, using in-region storage. LRS protects against hardware failure within the facility for continuity of service. Here's a link about Azure and it's data protection:
https://docs.microsoft.com/en-us/azure/security/fundamentals/protection-customer-data

By default, all the personal data will be retained indefinitely, or until instructed to do so by WMFS or a user of the app. If WMFS would like personal data to be automatically deleted after a certain time period (e.g. 3 months), then Shoothill can also do that.

2.3 Consultation requirements

Explain what practical steps you will take to ensure that you identify and address privacy risks. Who should be consulted internally and externally? How will you carry out the consultation? You should link this to the relevant stages of your project management process.

You can use consultation at any stage of the PIA process.

It is a requirement that FRS carry out consultation every 3 years

Privacy matters will be addressed by the external company (Shoothill) in these ways…. In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Shoothill shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO (more information on the ICO website).

Internally the Fire Authority and unions are aware of the consultation and staff will be engaged with

2.4 Identify the privacy and related risks

Identify the key privacy risks and the associated compliance and corporate risks.

Annex three can be used to help you identify the DPA related compliance risks.

The information received is provided by individuals who are completing the consultation document under their own volition
Related risks – the information provided is dealt with in the ways described below to mitigate and privacy related issues

Processing of personal information is required to carry out our official functions or a task in the public interest and WMFS has a legal basis for the processing the information under UK law. and perhaps legal obligation (for the equality data) - Processing is necessary to comply with legal obligations of WMFS.

2.5 Identify privacy solutions

Describe the actions you could take to reduce the risks, and any future steps which would be necessary (e.g. the production of new guidance or future security testing for systems).

We regularly review our technology stack, to ensure its up-to-date with the latest security standards. This includes reviewing our code to identify and patch any potential vulnerabilities.
- Shoothill have an internal password policy, whereby everyone is required to have a secure password, that changes every 6-months.
- When a new technology is introduced to Shoothill's coding practice, they conduct penetration testing to ensure their applications stays secure to prevent any breaches.
- Shoothill encrypt all data in-transit, and offer encryption at-rest should it be required for the project. This would mean encrypting all data within the database, or just the tables selected by WMFS.
- Shoothill's office is locked up out of hours, fit with a security system. This has monitoring, whereby should a breach of the premise happen the police will be alerted.

2.6 Sign off and record the PIA outcomes

Who has approved the privacy risks involved in the project? What solutions need to be implemented?

Risk	Approved solution	Approved by
Provision of personal details, post code, email	Ensuing that all data received is maintained	

address, contact number, gender, age, ethnicity, religion and belief	securely and that Shoothill adopt/adhere to current data protection guidelines
Transfer of information	Confirmation of receipt
Access to information	Details of all those who will have access to data is recorded

2.7   Integrate the PIA outcomes back into the project plan

Who is responsible for integrating the PIA outcomes back into the project plan and updating any project management paperwork? Who is responsible for implementing the solutions that have been approved? Who is the contact for any privacy concerns that may arise in the future?

Action to be taken	Date for completion of actions	Responsibility for action
As detailed in point 2.6 above	Consultation is due for completion in December 2020. Access to information will be required for analysis purposes for several months to follow and data may also be accessed for other work following this	
Contact point for future privacy concerns		

3. Linking the PIA to the data protection principles

Answering these questions during the PIA process will help you to identify where there is a risk that the project will fail to comply with the Data Protection Act (DPA) or other relevant legislation, for example the Human Rights Act 1998.

3.1 Principle 1 – Lawful, fair and transparent

Personal data shall be processed fairly, lawfully and, in a transparent manner in relation to the individual. To enable this then:

a) at least one of the lawful conditions in Article 6 is met as detailed below, and

b) in the case of sensitive personal data, at least one of the conditions in Article 9 is also met.

- Have you identified the purpose of the project?
- How will you tell individuals about the use of their personal data?
- Do you need to amend your privacy notices?
- Have you established which conditions for processing apply?
- If you are relying on consent to process personal data, how will this be collected and what will you do if it is withheld or withdrawn?
- Will your actions interfere with the right to privacy under Article 8 of the Human Rights Act?
- Have you identified the social need and aims of the project?
- Are your actions a proportionate response to the social need?
- If the project involves marketing, have you got a procedure for individuals to opt in for their information being used for that purpose?

3.2 Principle 2 – Purpose Limitation

Personal data shall be obtained only for one or more specified, explicit and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.

- Does your project plan cover all of the purposes for processing personal data?
- Have you identified potential new purposes as the scope of the project expands?

3.3 Principle 3 – Data Minimisation

Personal data shall be adequate, relevant and limited to what is necessary in relation to the purpose or purposes for which they are processed.

- Have I only collected the information that is necessary?
- Is the quality of the information good enough for the purposes it is used?
- Which personal data could you not use, without compromising the needs of the project?

3.4 Principle 4 – Accuracy

Personal data shall be accurate and, where necessary, kept up to date.

- If you are procuring new software does it allow you to amend data when necessary?
- How are you ensuring that personal data obtained from individuals or other organisations is accurate?
- What mechanisms have you in place to update/amend the information?

3.5 Principle 5 – Storage Limitation

Personal data shall be kept in a form that permits the identification of data subjects for no longer than necessary for that purpose or those purposes for which the personal data is processed.

- What retention periods are suitable for the personal data you will be processing?
- Are you procuring software that will allow you to delete information in line with your retention periods?

3.6 Principle 6 – Integrity and Confidentiality

Personal information should be processed in a manner that ensures appropriate security of the personal data including protection against unauthorised or unlawful processing, accidental loss or destruction, or damage using appropriate technical and organisational measures.

- Do any new systems provide protection against the security risks you have identified?
- What training and instructions are necessary to ensure that staff know how to operate a new system securely?
- If you will be making transfers, how will you ensure that the data is adequately protected?
  3. **Principle 7 – Accountability**

Are you able to show that you comply with the other 6 principles

4. Legal reasons for processing

In order to ensure that all information is processed lawfully and transparently then one of the following conditions need to be met. Processing will only be lawful if ONE of the following conditions is met:

Is this processing needed for some legally-defined public purpose? Then its condition is **public interest** - Processing of personal information is required to carry out our official functions or a task in the public interest and WMFS has a legal basis for the processing the information under UK law.

Is this required to deliver an agreement with the individual? Then its condition is **Contract** - Processing is necessary to meet contractual obligations entered into by the individual. – contracts are not just for purchasing but can include other activities such as employment activities.

Am I required to do this by law? Then its condition is **Legal Obligation** - Processing is necessary to comply with legal obligations of WMFS. What activities are we legally bound to carry out under Fire and Rescue Services Act and what personal information do we collect as result of these activities

Is this processing truly optional for both the organisation and the individual? Then its condition is **Consent** - Data subject gives consent for one or more specific purposes. – this should not be the first option but consider all other options first

Is this processing needed to protect someone's life? Then its condition is **Vital Interests** - Where processing the information is in a life or death situation.

Is the processing necessary for your legitimate interests or the legitimate interests of a third party? Then its condition is **Legitimate Interests -** This applies where you are using people's data in ways they would reasonably expect and which have a minimal privacy impact, or where there is a compelling justification for the processing. There are three elements to the legitimate interests basis. It helps to think of this as a three-part test. You need to identify a legitimate interest, show that the processing is necessary to achieve it and balance it against the individual's interests, rights and freedoms.

If your project does not fit into any of the above then contact Data Manager.