

# **Report on the Consultation by Warwickshire County Council entitled “Fire and Rescue Improvement Consultation”**

This report is a content analysis performed at the request of various residents of Bidford on Avon. It discusses the clarity and quality of the consultation document and the consultation questionnaire.

## **The Consultation Proposals**

The consultation proposals fall short of the standards normally expected in public life in the following areas:

### **1 Failure to use plain English**

Public bodies are now expected to use a level of English comprehensible to an average reader. Normally, a document should have a Gunning Fog index of 7 or 8. Above 12 is too hard for most readers. The Gunning Fog index for the consultation document is 17.7, which put it above the level of most university studies.

### **2 Insufficient background information**

The section entitled ‘Background Information’ does not, in fact, provide necessary background information such as number of fires, current number of staff, comparative examples from other well performing services. Instead, it is a series of arguments in favour of the proposals. These arguments may be valid, but the consultation does not give enough information for a reasonably well-educated reader to make up their mind.

### **3 Unexplained jargon**

The consultation document introduces terms such as “fifth watch crewing system” without any explanation. Since ‘fifth watch’ appears to be the heart of the proposals, it is unreasonable to expect an ordinary member of the public to be able to reach any conclusion as to whether the proposals are beneficial or not.

### **4 Misleading process**

The consultation document offers eight ‘Steps’. The clear implication is that step 2 follows from step 1, step 3 from 2, and so on, thereby leading the reader to believe that the steps must be taken together and in order. In reality, there is no indication in the document as to why step three cannot be achieved without steps one and two. Some of the later steps, such as reducing sickness absences, would not normally be the subject of public consultation, and would simply be acted on by management.

### **5 Failure to disclose costs**

None of the steps discussed in the report are costed. It is therefore impossible for a member of the public to decide that they would like to reject step 1, but retain the additional steps, since it is not clear whether or not the additional investment described in the later steps is being funded by savings in step 1.

## **The Consultation Questionnaire**

The consultation questionnaire is available online either for download or as a web-based survey.

### **1 Differing online and print versions**

The actual text of the two versions is not the same, for example:

Web version:

“We propose to introduce a fifth watch crewing system by centralisation of training and sickness cover to enable flexible crewing to match the demands on the Service. This will supplement the existing four watch model....”

Download version:

“We need to introduce a fifth watch crewing system by centralisation of training and sickness cover to enable flexible crewing to match the demands on the Service. This will be in addition to the existing four watch model....”

Although the differences are arguably trivial, the download and web versions are not the same and therefore not directly comparable.

### **2 Leading questions**

The questions in section 1 are such that no reasonable person could avoid choosing “Strongly agree” to eight of the nine questions. The same is true for sections 17, 20 and 23.

### **3 Questions which the user is not competent to answer**

Several of the questions require the user to make choices without sufficient information. For example, in section 1, last question, the user is asked to agree or disagree with a proposal to “Deploy an additional 25 wholetime firefighters in south Warwickshire”. However, the user is given no information as to whether 25 firefighters is insufficient to overcome gaps left by other proposals, barely sufficient, sufficient, or over-sufficient.

### **4 Inappropriate answer choices**

Choices to all questions are either “Strongly agree, agree, disagree or strongly disagree”, or “very pleased, pleased, concerned, very concerned”. However, these responses do not always match the questions. A more reasonable set of responses for the question on numbers of firefighters would be: “Too few, just enough, about right, too many”.

### **5 Impossible questions**

Section 2 asks the question: “Please indicate whether you agree or disagree that the introduction of a flexible crewing system will enable us to deliver a service that matches the current and future demands from the community?” However, even the most informed respondent cannot reasonably be asked to speculate on the future demands from the community. The same is true for sections 5, 11 and 14.

### **6 Meaningless questions**

Section 8 (online version) states: “Please indicate whether you agree or disagree that the introduction of a policy that aggressively reduces attendance at the number of automatic false alarm calls to enable an increase in Community Fire safety and training activity?” Although most of the questions are ungrammatical, this question is literally meaningless, as the absence of a main verb means it is impossible to determine what the respondent is being asked to agree with.

## **7 Inappropriate personalisation**

The respondent is frequently asked to describe how they feel about the proposals. This is inappropriate in a public consultation, although the technique is highly appropriate to a data gathering exercise or piece of market research.

## **8 Inappropriate monitoring**

The monitoring sections 29-32 provide sufficient information to exactly identify an individual firefighter employed or retained by the service. They can also be used to exclude people with a legitimate interest, for example, a resident of Cleeve Prior who lives outside Warwickshire but may work in Bidford, or may expect help from a Bidford fire appliance.

## **9 Failure to provide other comments section**

A majority of respondents are likely to find the format of the questionnaire unnecessarily constraining, and may wish to present their complete set of comments in one place. However, the survey system only allows for comments on a proposal by proposal basis.

## **10 Failure to ask the relevant questions**

At no point does a question specifically address the closure of individual fire stations, or the concept of closure in general. The preamble to sections 5 and 6 discusses ‘the stations not required under the 12 station plan’, but section 5 addresses an entirely different issue, that is, increase in the number of resources. Question 6 addresses the 12 station plan, but only in the sense of how the user feels — therefore providing information which cannot legitimately be used to infer public agreement or disagreement. A free text section is provided, but, as such, cannot be used in a tabulated data response.

## **Conclusions**

The government’s code of practice on consultations is available online here:

<http://www.berr.gov.uk/files/file47158.pdf>

This code, and its predecessor, is not mandatory for local authorities, but local authorities are encouraged to adopt it as good practice.

Criterion 3 states: “**Consultation documents should be clear about the consultation process, what is being proposed, the scope to influence and the expected costs and benefits of the proposals.**”

On this basis, the consultation described clearly fails to satisfy national good practice guidelines, in the following ways:

The process is unclear, since the exact status and weight of replies is not defined.

The proposals are unclear to an ordinary person.

The scope to influence is unclear.

No costs are set out.

The benefits are not clearly set out, for example in terms of lives saved, fires prevented.

## **Declarations of interest:**

This analysis was compiled by Martin Turner, 24 Cleeve Road, Marlcliff, B50 4NR.

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## **Statement of competence:**

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

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