

EAST SUSSEX FIRE AUTHORITY

Date: 13 June 2024

Title of Report: Mayfield Options Appraisal – Consultation and Communication Plan

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Lead Officer: Liz Ridley, Assistant Director Planning & Improvement

Background Papers: [Effectiveness, efficiency and people 2021/22: An inspection of East Sussex Fire and Rescue Service \(justiceinspectorates.gov.uk\)](https://justiceinspectorates.gov.uk)
[Effectiveness, efficiency and people 2018/19: An inspection of East Sussex Fire and Rescue Service \(justiceinspectorates.gov.uk\)](https://justiceinspectorates.gov.uk)
[The Gunning Principles.pdf \(local.gov.uk\)](https://local.gov.uk)
[Microsoft Word - Consultation Principles \(1\).docx \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

Appendices: 1. Equality Impact Assessment, Consultation and Communication Plan

Implications (please tick ✓ and attach to report)

CORPORATE RISK		LEGAL	x
ENVIRONMENTAL		POLICY	
FINANCIAL	x	POLITICAL	
HEALTH & SAFETY		OTHER (please specify)	
HUMAN RESOURCES		CORE BRIEF	
EQUALITY IMPACT ASSESSMENT: Attached at Appendix 1			

PURPOSE OF REPORT To present the communication and consultation plan for the Mayfield Options Appraisal for approval.

EXECUTIVE SUMMARY The Service has a robust process for consultation and communication developed through its Community Risk Management Planning (CRMP) arrangements. These arrangements provide stakeholders, the public and staff, clear and relevant information as to how they can get involved in the decision-making arrangements of the Fire Authority.

The arrangements are set out in the Communication, Engagement and Consultation strategy, presented elsewhere on this agenda. The strategy ensures that the voices of the public, partners, staff and businesses groups can contribute and be considered in decision making.

The arrangements follow the Gunning Principles which are the founding legal principles applicable to public consultation in the UK.

The Service sought guidance from the Consultation Institute in respect to its consultation arrangements and has engaged an external consultation specialist to develop the material. The consultation period for the Mayfield Options appraisal is set at twelve weeks, following the advice received.

As a result of the announcement of the UK Parliamentary General Election on Thursday 4 July, the Service intends to start the consultation on Friday 5 July, closing on Friday 27 September 2024. The results will be considered by the Fire Authority at its meeting on 5 December 2024.

The consultation plan consists of:

- On line questionnaire, with hard copy questionnaires available on request.
- Three Public Focus groups where deliberative/qualitative information will be captured.
- An online stakeholder forum where deliberative/qualitative information will be captured.
- Communication plan – which sets out how communities and groups will be engaged with.

RECOMMENDATION

The Fire Authority is asked to approve the consultation and communication plan for the Mayfield Fire Station Options Appraisal.

1. INTRODUCTION

1.1 The Service has a robust process for consultation and communication that provides stakeholders, the public and staff with clear, relevant information and affords them with an opportunity to engage with the Service when making decisions. The Service has been recognised by His Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) as being strong in this area. The 2018/19 inspection report stated that, '*plans are informed by the views of a wide range of organisations and people.*' The 2021/22 report further established that, '*The service has consulted and undertaken constructive dialogue with communities and other groups.*'

1.2 The Service's consultation and communication plans utilise several methods which include face to face meetings, public focus groups, social media and online surveys and questionnaires. Previous consultation exercises have provided response rates as follows.

- 2,047 responses were received for the last Integrated Risk Management Plan, 'Planning for a safer future' (during 2020).
- 675 from the review of our attendance standards.
- 588 from the consultation on 2017/20 Integrated Risk Management Plan.

- 655 from 'Changing the Service, Shaping our Future'.
- 504 from the Hastings Review.
- 347 from the rural review.

1.3 The Service's consultation arrangements follow the Gunning Principles which are the founding legal principles applicable to public consultation in the UK.

- **Gunning 1** Consultation must be at a time when proposals are still at a formative stage.
- **Gunning 2** Sufficient reasons must be put forward for any proposal to permit "intelligent consideration" and response.
- **Gunning 3** Adequate time is given for consideration and response.
- **Gunning 4** The product of consultation is conscientiously taken into account by the decision maker(s).

1.4 As part of the consultation arrangements the Service conducts pre engagement prior to any consultation period, ensuring the voices of the public, partners, staff, local community and businesses groups can contribute and be considered in decision making.

2 CONSULTATION AND COMMUNICATION STRATEGY FOR MAYFIELD

2.1 Pre engagement

2.1.1 Staff, representative body and stakeholder engagement has taken place with early work starting in January 2024, ensuring views were reflected during options development. The pre engagement consisted of a survey on the Service's web site and an email sent to over two hundred businesses and groups in Mayfield. The survey asked for views on:

- What do you consider the main risks to be in your local area?
- Are there any local issues or impacts you feel we need to be aware of?
- What information do you think we need to consider in developing the options?
- What are the factors we need to consider when taking the options appraisal out to public consultation?
- What other ideas can you suggest for us to meet our financial challenges?

2.1.2 There were 82 respondents to the survey together with several emails and requests for Officers to join local meetings. Officers attended a local parish council meeting and a presentation was given to a number of stakeholders at Service headquarters. Staff were also made aware of the survey and the local crews at Mayfield were visited by Officers. All feedback has been considered in the development of the options appraisal.

2.2 Consultation Plan - Mayfield

2.2.1 Following the announcement of the UK Parliamentary General Election on Thursday 4 July, the Service intends to start the consultation on Friday 5 July, closing on Friday 27 September 2024. The results of the consultation will be presented to the Fire Authority meeting on 5 December 2024.

Government advice around consultations, published in 2018, states:

- Consultations should be clear and concise.
- Consultations should have a purpose.
- Consultations should be informative.
- Consultations are only part of a process of engagement.
- Consultations should last for a proportionate amount of time.
- Consultations should be targeted.
- Consultations should take account of the groups being consulted.
- Consultations should be agreed before publication.
- Consultation should facilitate scrutiny.
- Government responses to consultations should be published in a timely fashion.
- Consultation exercises should not generally be launched during local or national election periods.

It is important to note that this guidance does not have legal force and is subject to statutory and other legal requirements.

2.2.2 With specific reference to the length of the consultation, it advises:

‘Judge the length of the consultation on the basis of legal advice and taking into account the nature and impact of the proposal. Consulting for too long will unnecessarily delay policy development. Consulting too quickly will not give enough time for consideration and will reduce the quality of responses.’

A meeting was held with the Consultation Institute and they provided guidance about pre engagement and the length of the consultation period. As the consultation period covers the summer months, they recommended that it should be of twelve weeks duration.

2.2.3 The Service has been running consultations for Integrated Risk Management Plans and Service Reviews for many years and has found the following trends in responses to be typical:

- Interested parties respond very quickly, sometimes using more than one method of communication.
- Any media coverage is usually immediate and will raise the public’s interest very quickly after information is released.
- People who attend the focus groups, forums and staff meetings tend to respond straight afterwards once information has been received and discussed.
- Once initial meetings and communications have been sent, reminders do elicit further interest but at a very much lower level than the first responses.
- During the last 2 or 3 weeks of the consultation period there is very little interest and requests for information have usually died down completely
- Regardless of the timescale there will always be people who respond after the deadline resulting in their responses being too late to be included in the resulting report. This, however, is usually very low.

2.2.4 The consultation plan has been reviewed and guidance has been sought from the Service’s consultation providers who have worked with us to develop the plan. The plan is as follows:

- On line questionnaire, with hard copy questionnaires being available on request.

- Three Public Focus groups where deliberative/ qualitative information will be captured.
- An online stakeholder forum where deliberative/ qualitative information will be captured.
- Communication plan – which sets out how communities and groups will be engaged with and how they can get involved.

2.2.5 The three public focus groups enable face to face communication and an in-depth deliberative discussion on the options. The participants are recruited in advance to match agreed criteria to ensure representative groups are included. Key advantages of these focus groups are:

- Participants can interact and “bounce” ideas and views off each other
- Enables a good geographic spread of participants
- Can allow for explanations of background issues if stimulus material is provided

2.2.6 The stakeholder forum will be conducted online in real-time at a predetermined time and date. There will be a presentation of the issues under consideration followed by a question and answer session. The key advantages to this are that it provides an opportunity for many participants to take part easily and at no cost to them and enables an explanation of complex issues.

2.3 **Communication plan**

2.3.1 A co-ordinated communications campaign will support the consultation process and promote participation in the consultation.

2.3.2 There are a number of key objectives:

- To publicise the plan and its proposals
- To encourage participation in consultation
- To set out next steps
- To help the public understand that we are facing new challenges.

We will carefully monitor the number of responses and adjust our strategy accordingly.

2.3.3 The Service will make information readily available and as previously indicated by the Fire Authority, there is a preference for free or low-cost options which have a proven record of success. In terms of accessibility, the Service’s website has a ‘Recite Me’ function which offers a range of on-demand accessibility solutions that support the online community with digital accessibility through customisable options, including translation functions. All material is therefore translatable if requested.

2.3.4 The Service will therefore use digital channels; however it is important to note that according to Ofcom, internet usage drops from age 55 upwards. The Service intends to support our digital communication with other forms of communication such as local media, which will reach those not online. We will use stakeholder groups such as specialist charities to seek the views of those groups deemed to be harder to reach through the stakeholder data base and our usual methods.

Localised content

The Service will provide information which is tailored to local areas so the public can better understand the proposals and the rationale behind them.

Digital Communication

The website will have a page dedicated to the consultation including information about how people can take part, and a link to the online survey. It will also host a range of publicity materials and links to Fire Authority papers.

A social media campaign will be launched and will use advertising to target members of the public in key areas. Any questions will be answered promptly with people signposted to further information.

Media engagement

The media remains an important route to reaching a wide range of audience groups.

The local media will be given with briefings, press releases and offered interviews with Senior Officers.

It is anticipated that there will be a higher demand for ongoing media responses and interviews during the consultation period and spokespeople will be available to respond to these as well as help launch the consultation.

There will be media monitoring in place to help assess common themes of concern or interest and these will be used to shape communications as the consultation progresses.

Stakeholder engagement

The Service holds a consultation database with over 500 contacts and this will be utilised to target key stakeholders in the area including, but not limited to Parish Councils, charities, support groups and partners. We will support on line engagement by Fire Authority Members and ESFRS staff by producing relevant material.

3 LEGAL IMPLICATIONS

- 3.1 The Best Value Duty applies to how 'authorities should work with voluntary and community groups and small businesses when facing difficult funding decisions.' It states that authorities are to 'consider overall value, including economic, environmental and social value, when reviewing service provision'. To achieve this balance, prior to identifying how best to meet the Best Value Duty, authorities remain 'under a Duty to Consult representatives of a wide range of local persons.'

4 FINANCIAL IMPLICATIONS

- 4.1 A budget of £40,000 has been identified for this consultation, funded through the corporate contingency. The cost has the potential to increase depending on the numbers of surveys received as the quote is based on an estimated number of returns. If the response rate is higher than expected, the costs may increase. There is an additional option from the provider to offer a translation of the

questionnaire which would be at an additional cost. However, the Service's website has a 'Recite me' function that provides a range of accessibility solutions that can be used to translate the consultation material. The following table shows the costs associated with previous public consultation exercises.

Consultation	Cost* £'000	Response rate
Planning for a Safer Future 2020	41*	2,047
Attendance standards	22	675
Consultation on 2017/20 IRMP	10	588
Changing the Service Shaping our Future	22	655
Hastings Review	19	504
Rural Review	30	347
*Includes in house costs for the mail outs and social media advertising costs		

5 EQUALITY AND DIVERISTY IMPLICATIONS

- 5.1 An Equality Impact Assessment (EIA) specific to the consultation and engagement plan for the Mayfield Fire Station Options Appraisal is attached as Appendix 1.