

Internal Audit Memorandum Report



Liverpool
City Council

SUBJECT: MFRS Consultation Arrangements
AUDIT MANAGER: Melanie Dexter
AUDITOR: Sue Scully
DATE: 04th May 2016
DISTRIBUTION: Deb Appleton, Director of Strategy and Performance
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Background

A report was presented to members of the Merseyside Fire and Rescue Authority (MFRA) on 3rd December 2013 setting out potential options for station mergers / closures, necessitated by budget cuts. Members gave delegated authority to the Chief Fire Officer in consultation with the Chair and Party Spokespersons to:

- i) *Identify the most suitable merger sites from which to operate whilst ensuring response standards are maintained.*
- ii) *Identify potential partners for joint working.*
- iii) *Undertake the necessary preparatory work around the procurement of appropriate sites in order to expedite the mergers option in the event that Authority approval is confirmed after the public consultation process is concluded.*
- iv) *Submit a bid for resources to support any scheme as appropriate to any available funding sources.*

A subsequent report to the Authority Budget Meeting on 27th February 2014 resolved that members:

- b) *Consider the outcomes of the stakeholder/public engagement as they make any decisions on proposals relating to their financial plans including station mergers and the other operational response options.*

The consultation exercises took place between May 2014 and November 2015. Internal Audit was asked to assess the general principles and procedures followed in conducting the consultations. The result of our assessment is detailed in this report.

Scope of the audit exercise

The audit review has examined the processes and procedures followed in order to give some assurance to the Authority that the consultation process took account of the views and



opinions of all interested parties. In order to do this we have reviewed the procedures followed for consulting with interested parties over the planned closure / mergers of various fire stations to confirm the effectiveness of the process.

Conclusion

For several years, we understand that the Authority's consultation when preparing its Integrated Risk Management Plan was limited to public meetings. Although we have been told that they were delivered at low or no additional cost, we have also been told that they were ineffective in relation to achieving meaningful consultation with the public, as very few people attended. Since then, the Authority has developed a more inclusive and varied approach to offer a broad range of consultation options for people to engage with, backed up with publicity to promote the consultation.

The consultation exercises that have taken place over the past two years have taken adequate steps to engage and inform all interested parties. The level of engagement through focused meetings, questionnaires and open meetings has been mixed with, probably the highest level being where individuals feel strongest about the proposals. Participation levels in on line questionnaires, with the exception of the first undertaken during the initial Wirral consultation, were generally fairly low. The response rate in the first Wirral questionnaire was 977 with only 363 responses in all other questionnaires conducted. There is however no evidence to indicate that this is as a result of poor publicity.

The one postal survey sent to 10,000 randomly selected addresses did not achieve a demonstrably higher return with only 1,351 (13.5%) responses representing a cost of just over £14 per respondent, although it could be said that the Authority did directly engage with 10,000 through this approach, whether or not they chose to respond. Consideration therefore should be given as to the cost effectiveness of such an exercise for future consultations. It is noted that this method of engagement was only used for one of the consultations being considered and was, we have been informed, adopted to address a particular concern that there was a risk that some residents in the affected area were having a disproportionate impact on the consultation outcomes. This has not been the case in the other consultations.

At present, although issues from completed consultations are used to inform future exercises there is no formal means of capturing the information, for example through a Lessons Learned Log. There has been a draft Consultation Framework developed which will deliver a best practice approach for future consultations, building on what has been learned from all completed consultations.



Findings

In order to evaluate the effectiveness of the processes and procedures undertaken during the consultation exercises we looked at a number of control measures expected within a consultation process as detailed in a Government Guideline – Consultation Principles 2016. The expected controls are detailed below with our assessment as to how the processes and procedures achieved each one. There are also three Appendices attached which detail the level of engagement during each consultation exercise, with costs identified where available.

Appropriate consultation period - all consultations undertaken relating to station closures / mergers were subject to a 12 week consultation period which is in line with Government guidelines.

Clear and concise questions established - the questions presented in the online questionnaires and the forum meetings for each consultation exercise were clear and understandable. Response rates however, with the exception of the first Wirral consultation were fairly low as detailed above.

Adequate publicity in respect of exercises – the outcome reports for each consultation exercise indicated that there were various mediums utilised to publicise them, including leaflet drops, websites, twitter and radio interviews. Poor attendance at meetings could indicate that not all target members of the public were aware that the consultations were taking place or it could simply be a measure of disinterest. For the second Wirral exercise there was additional publicity through a postal survey, although the response rate was poor and the cost fairly high, possibly indicating that this form of contact does not result in increased engagement. There was additional targeted leafleting used for the St Helens and Eccleston exercise, however, given the very poor turnout at public meetings this again appears not to have had added benefits.

Representative membership of targeted groups - as part of the consultation process for each potential merger / closure Opinion Research Services (ORS) was commissioned to run focus group meetings and forums. They were deliberative consultations (ie where people have more time to think about complex issues and read and understand existing research) with participants recruited by random-digit telephone dialling from the ORS Social Research Call Centre. ORS stated that care was taken to ensure that no potential participants were disqualified or disadvantaged by disabilities or any other factors, and the venues at which the forums met were readily accessible. People's special needs were all taken into account in the recruitment and at the venues and expenses were paid. Attendance levels at the sessions were mixed, with some meetings not achieving the target attendance levels set. Given the mixed level of attendance by those selected it may be concluded that paying attendees expenses is neither an incentive nor a disincentive in relation to an individual's decision to either take part or not take part in the groups.



Suitability of venues for meetings - every effort appears to have been made to ensure that access would not be an issue for both the deliberative and open meetings. A venue selected (apparently at the suggestion of a Council Member) for an open meeting for the second Wirral consultation however was clearly not big enough. The Authority was aware of the very high level of interest in the first consultation, however we understand that there was no larger suitable alternative in the area affected. On the night of the meeting however, we have been told that Fire and Rescue Service staff stood outside the venue and discussed the proposals with those members of the public who could not be admitted. .

Timely reporting of outcomes - outcomes of the individual consultation exercises were all reported within the time frame of twelve weeks as advised in the government guidelines produced relating to Consultation Principles.

Access to outcomes by interested parties - all outcome reports with their relevant appendices were readily available on the MFRS web site. Members of the public and any other interested party could also attend meetings where they were discussed, subject to exclusion of any restricted exempt items.

Detail relating to level of participation, including comments made - each consultation outcome report contained detailed information in terms of how many people engaged in the process through both deliberative and open meetings and how many completed questionnaires and surveys. Responses, questions and comments made and other general correspondence were all adequately reported. Generally, with the exception of both proposals for the Wirral, those people who engaged in the process appeared either to support or accept as unavoidable the proposals made.

Avoidance of election periods - government guidelines relating to the Consultation Process state that consultation exercises should not generally be launched during local or national election periods unless exceptional circumstances make a consultation absolutely essential (for example, for safeguarding public health). In two cases (the Huyton & Whiston and the second Wirral consultations) elections did fall within the 12 week consultation period. Should any further consultation exercises be planned it is recommended that every effort be made to ensure that the purdah period is avoided.

Equality impact assessment - an Equality Impact Assessment (EIA) was compiled in late 2013 as part of the initial "in principle" exercise relating to potential mergers / closures. This was presented to members with the report entitled, Outcome from Station Mergers Engagement, presented on 27/02/2014. At the outcome of each consultation it has been further updated, with the changes being highlighted (for ease of identification) following the last two exercises (Wirral number 2 and St Helens & Eccleston).

Lessons learned – through testing and discussion with staff we can confirm that lessons have been learned from each consultation process and they have been used to inform how the following consultations may be conducted. At present however, this information isn't being

Internal Audit Memorandum Report



Liverpool
City Council

captured in a written log. We would recommend that consideration be given to setting this up for any future consultation exercises. A detailed consultation framework has been drafted which has addressed issues, both good and not so good, from completed consultation exercises. This will inform how future exercises will be conducted.



Appendix One

Costs associated with engagement exercises

Method of engagement	Total cost
Focus groups and forums	£50,812.50
On line questionnaires	No additional cost
Postal questionnaire	£19,195.00
Public and stakeholder meetings	£ 6,933.95
Fire station staff consultation	No additional cost
Fire station users consultation	No additional cost
	£64,454.45

Notes:

- 1) The postal questionnaire was only conducted for the second Wirral consultation
- 2) All costs we understand were contained within existing Fire and Rescue Service budgets



Appendix Two

Breakdown of participants in consultation exercises with indicative costs

Consultation details		Group / activity	No of participants	Cost	
Stations	Dates			Total	Per participant
Huyton & Whiston	06/05/14 to 28/07/14	Prescot focus group	11	£10,670.00	£355.67
		Whiston focus group	11		
		Huyton focus group	8		
		All Knowsley forum	18		
		On line questionnaire	93	No additional cost	No additional cost
		Fire station staff consultation	Not known		
		Fire station users consultation	Not known	£1,817	£90.85
		Public meetings	6		
Stakeholder meeting	14				
Upton & West Kirby (1)	03/10/14 to 26/12/14	Upton focus group	4	£11,143.75	£348.24
		Greasby focus group	8		
		West Kirby focus group	9		
		All Wirral forum	11	No additional cost	No additional cost
		On line questionnaire 1	977		
		On line questionnaire 2	12	No additional cost	No additional cost
		Fire station staff consultation	Not known		
		Fire station users consultation	Not known	£1,356.55	£3.48 / £3.01
		Public meetings	380 to 440		
Stakeholder meeting	10				
Allerton	01/11/14 to 26/01/15	Liverpool wide forum	21	£7,258.75	£154.44
		Allerton focus group	4		
		Merseyside forum	22		
		On line questionnaire	65	No additional cost	No additional cost
		Fire station staff consultation	Not known		
		Fire station users consultation	Not known	£1,650	£51.56
		Public meetings	28		
Stakeholder meeting	4				

**Internal Audit
Memorandum Report**



**Liverpool
City Council**

Consultation details		Group / activity	No of participants	Cost	
Stations	Dates			Total	Per participant
Upton & West Kirby (2)	02/03/15 to 31/05/15	Saughall Massie focus group	10	£10,870	£221.84
		West Kirby focus group	9		
		Upton focus group	8		
		All Wirral forum	22		
		On line questionnaire	129	No additional cost	No additional cost
		Fire station staff consultation	Not known		
		Fire station user consultation	Not known		
		Postal survey	1,351	£19,195	£14.21
		Public meetings	158	£923	£5.74
		Stakeholder meeting	3		
St Helens & Eccleston	03/08/15 to 01/11/15	Eccleston focus group	7	£10,870	£293.78
		Canal St focus group	8		
		St Helens focus group	6		
		All St Helens forum	16		
		Fire station staff consultation	Not known	No additional cost	No additional cost
		Fire station user consultation	Not known		
		On line questionnaire	64		
		Public meetings	20 (approx.)	£1,187.40	£51.63
Stakeholder meeting	3				

Notes

1) 10,000 postal surveys were issued in the second Wirral consultation at a cost of £1.92 per household / recipient



Appendix Three

The value of the consultation techniques used

Focus groups and forums

These provide an opportunity for the Authority to engage with a demographically representative group of people from the area/s affected by the proposals. Those people are randomly selected and spend up to two and a half hours carefully considering the proposals in detail. They are reimbursed for their out of pocket expenses. By using an external provider to facilitate, the Authority is able to ensure that (in the majority of cases) the participants do not have a fixed view when they arrive and that they can approach the consideration of the proposals in an objective way. This is particularly important when considering the limitations of public meetings. See below.

Public meetings

These would generally not result in a representative group of the local population attending and giving their views as people usually attend public meetings because they have strong views about a proposal. Generally we understand, in the Authority's experience, those attending such meetings are opposed. Public meetings definitely have a place in any consultation as "listening events", allowing people to air their concerns. However, the Authority cannot take the majority view from any public meeting as being representative of the views of the overall population, hence the requirement for more deliberative focus groups and forums.

On line questionnaires

We understand that on line questionnaires are widely used by the Authority as they have no additional cost, are quick to set up and allow people a different way of participating. For each of the consultations the questionnaire forms were also made available as paper copies. They are similar to public meetings in that they provide an opportunity for the Authority to "listen" to views, but they would generally not always result in contributions from a representative group of the population, so only have value when more deliberative methods are used alongside them.

Postal survey

This technique was used only once, in Wirral. It was a useful way of reaching a large number of people who were representative of the general population in the area. We have been informed that officers feared that the views of people in West Kirby may not have been heard during the first Wirral consultation due to the disproportionate contribution of people from Greasby. To avoid the same issue occurring in relation to consultation on the Saughall Massie site, it was decided to conduct a postal survey which brought the consultation directly to the attention of 10,000 people and allowed them to comment on what the proposals meant to them. With the absence of a similar situation in St Helens, no postal survey was required for that consultation.



Staff and Service user consultation

We have been informed that other consultation was conducted with staff at the affected locations by officers from the Service. In addition, officers conducted consultation with users of the premises concerned, both at no extra cost. This allowed all those people directly affected by the proposals to have a say.

Letters, emails and other meetings

We have been informed that all letters and emails received during the consultation periods were responded to promptly and in detail. In addition, the Chief Fire Officer attended several meetings with groups of interested people from the local area to explain the proposals, both at no additional cost. This responsive approach to concerns and comments was intended to help people understand the proposals to assist them in formulating a view.