Phase 2 Addendum: On-Call Improvement Programme Assurance Review

March 2026

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Section 1:
Background and Scope of Work

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Background

Buckinghamshire Fire & Rescue Service (BFRS) is delivering an On-Call Improvement Programme (OIP) to better align available resources with risk and strengthen on-call cover. A 10-week public consultation (19 Nov 2025 – 28 Jan 2026) seeks feedback on proposals to:

- Remove some On-Call fire engines that cannot be reliably crewed, replacing some with specialist vehicles that are better matched to local risks and community needs.

- Close two On-Call stations that have not been able to crew a fire engine for many years (Great Missenden and Stokenchurch).

- Base specialist vehicles at the stations that best match local risks and community needs, making it easier to crew them and improving how quickly they can respond.

- Give the Chief Fire Officer more flexibility to make quicker, evidence-based decisions about where resources are based.

Scope of work

The assurance review followed a two-phased approach, with this report covering Phase 2.

- Phase 1 assessed the pre-consultation process, where it was found that option development and modelling were overall robust and consistently applied. It validated that the consultation approach and decision-making pathway were fair, transparent, and aligned with the first three Gunning Principles (see Appendix 1).

- Phase 2 focuses on post-consultation assurance, including analysis of responses, verification of conscientious consideration of feedback, and updates on evidence, financial case, and residual risks, aligned with the fourth and final Gunning Principle.

- 'Conscientious Consideration' focused on evidence that BFRS undertook a structured review of the ORS report and other inputs, tracked themes across public/staff/stakeholder responses, re-examined assumptions and analysis considering feedback, and documented what changed and why, including where views did not alter the proposal.
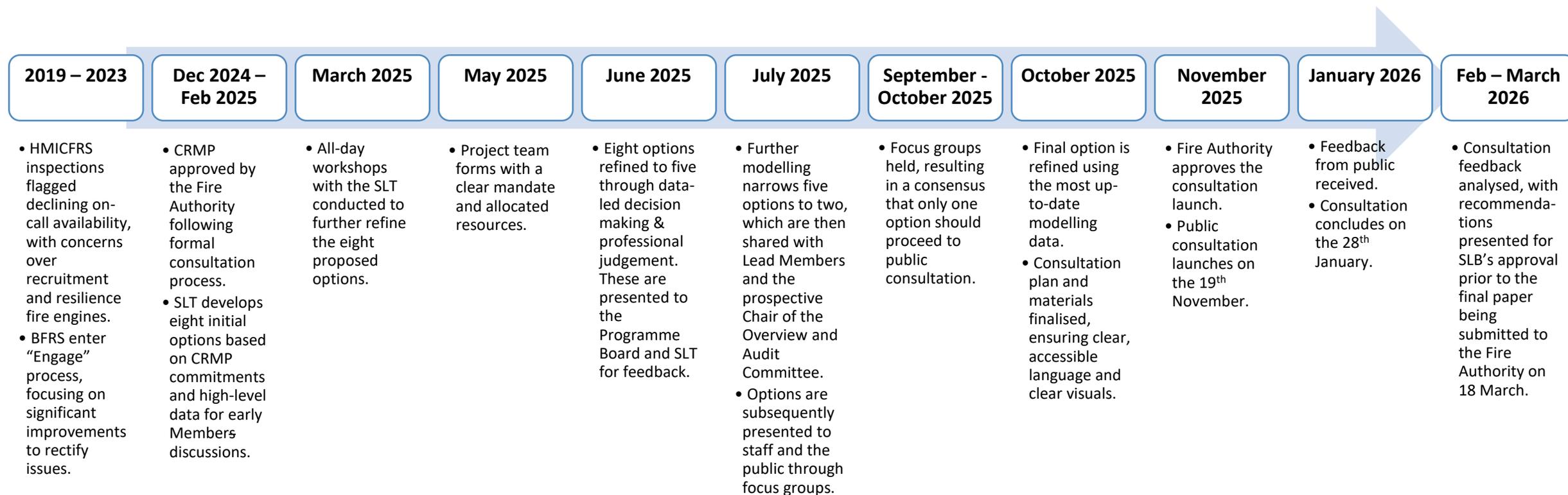
Through document review and a call with the Group Commander for OIP, we developed a thorough understanding of how the feedback influenced the emerging recommendations. Documents reviewed in this phase are listed in Appendix 2.

Limitations

- Although engagement was high in volume, the open questionnaire was self-selecting, meaning responses reflect motivated participants rather than a representative sample. Although ORS removed duplicates and segmented results to aid interpretation, the findings should be regarded as indicative of sentiment rather than a statistically balanced view.

- Running the on-call proposals and operational independence question within the same consultation created confusion among respondents. Many viewed the two issues as linked, with some believing operational independence could be used to implement appliance changes regardless of consultation outcomes. This conflation risks influencing how respondents framed their feedback and introduces a degree of interpretation bias.

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Consultation Timeline

The On-Call Improvement Project was delivered during a period of significant change, which ultimately influenced delivery timelines. The timeline below sets out the key events leading up to the consultation launch and the final decision point of the proposals, providing an end-to-end view of the process.

2019 – 2023	Dec 2024 – Feb 2025	March 2025	May 2025	June 2025	July 2025	September - October 2025	October 2025	November 2025	January 2026	Feb – March 2026
• HMICFRS inspections flagged declining on-call availability, with concerns over recruitment and resilience fire engines. • BFRS enter "Engage" process, focusing on significant improvements to rectify issues.	• CRMP approved by the Fire Authority following formal consultation process. • SLT develops eight initial options based on CRMP commitments and high-level data for early Members discussions.	• All-day workshops with the SLT conducted to further refine the eight proposed options.	• Project team forms with a clear mandate and allocated resources.	• Eight options refined to five through data-led decision making & professional judgement. These are presented to the Programme Board and SLT for feedback.	• Further modelling narrows five options to two, which are then shared with Lead Members and the prospective Chair of the Overview and Audit Committee. • Options are subsequently presented to staff and the public through focus groups.	• Focus groups held, resulting in a consensus that only one option should proceed to public consultation.	• Final option is refined using the most up-to-date modelling data. • Consultation plan and materials finalised, ensuring clear, accessible language and clear visuals.	• Fire Authority approves the consultation launch. • Public consultation launches on the 19th November.	• Feedback from public received. • Consultation concludes on the 28th January.	• Consultation feedback analysed, with recommendations presented for SLB's approval prior to the final paper being submitted to the Fire Authority on 18 March.

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On-Call Improvement Programme: End-to-end process

This review assesses activities undertaken during Phase 2 of the On-call Improvement Programme, based on feedback received from respondents. Detailed findings demonstrate how feedback was taken into conscientious consideration for the final proposals for change.

Phase 1

Strategic workshops & initial option development

The initial development of eight options by the SLT was handed over to the newly formed project team, which using updated data, refined and reduced these to five options.

Early engagement/ Pre-consultation activities

Early engagement activities were undertaken to shape the public consultation. The options have since been fully developed and refined from five to two, which are now presented to the public and staff for feedback.

Final modelling & option development

Public feedback indicated a preference for a single option. Further modelling and refinement of criteria resulted in the final proposed option for consultation.

Fire Authority approval & Consultation launch

The consultation pack consolidated all available data in an accessible format, with appropriate checks and formal sign-offs completed by the Fire Authority.

Phase 2

Active consultation & engagement

Public consultation launched on the 19th November, collecting staff and the public's view on the on-call proposals.

Post-consultation feedback analysis

Following the conclusion of the consultation at the end of January, all feedback received was analysed by ORS and the project team.

Consideration of proposals

Based on the feedback received, the proposal was assessed to determine the final recommendation for inclusion in a paper to the Programme Board, prior to Fire Authority approval.

Final assurance & decision to Fire Authority

Recommendation will be presented to the Fire Authority on the 18th March.

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Section 2:
Executive Summary

Executive Summary (1/2)

On the balance of evidence, the On-Call Improvement Programme has established a clear and structured process for demonstrating 'conscientious consideration' of consultation feedback, supporting compliance with Gunning Principle 4. The programme team has revisited assumptions, updated the analysis, and refined proposals where appropriate, with all material adjustments evidenced, reasonable, and clearly traceable to stakeholder input.

Consultation activity generated significant engagement across staff, the public, and wider communities, with 956 questionnaire responses, focus groups, drop-ins, and written submissions forming a rich, triangulated, evidence base. While opposition remains present in some areas, particularly around appliance removal and station closures, the programme demonstrates an iterative and transparent approach to addressing concerns.

Provided the final decision paper explicitly evidences the full issue-to-decision audit trail, including additional transparent analysis and supporting documentation, it will clearly demonstrate that consultation feedback has been conscientiously considered in line with Gunning Principle 4, ahead of the SLB and Fire Authority decisions in March 2026.

Area	Observations/ Insights	RAG	Improvement Opportunities
Conscientious Consideration	• The programme has applied a structured, transparent methodology to analyse consultation feedback, including ORS evidence, re-examination of assumptions and weighting of substantive concerns. • A comprehensive themes-to-actions tracker provides the core audit trail from issues to analysis to decisions, evidencing Gunning Principle 4 in practice. • Engagement levels were high and diverse, with 956 questionnaire responses, focus groups, drop-ins and submissions forming a robust evidence base. • There is clear evidence that consultation responses have informed refinements to proposals, although clarity of final documentation will determine completeness of the audit trail.	🟩	• Complete and integrate the updated EIA, highlighting differential impacts, mitigations, and post-implementation monitoring expectations. • Ensure the final paper clearly maps feedback to analysis to rationale to decision, demonstrating full compliance with Gunning Principle 4. • Strengthen modelling transparency, clarifying assumptions, caveats and data updates, i.e. recent availability trends. • Provide a concise, integrated evidence summary (quantitative and qualitative) in the final decision paper to improve Members' readability and reinforce defensibility.
Impact of Feedback on Proposals	• Feedback analysis led to tangible, evidence-based changes, including retaining Buckingham on-call appliance, adding RFV capability, and establishing a strategic reserve. • Staff and stakeholder feedback provided operational insight not fully captured in earlier modelling, prompting refinement of assumptions and proposals. • Broader concerns about on-call sustainability (recruitment, training, support) triggered reassessment of long-term viability and forward planning needs. • While no new modelling was undertaken, additional analysis and consultation inputs provided a credible basis for adjustments and strengthened governance readiness.	🟩	• Define and document the strategic reserve governance, i.e. activation triggers, readiness standards, reporting. • Specify the Buckingham dual-use operating model, including competency maintenance, mixed-crewing parameters and performance measures. • Strengthen the implementation plan, covering recruitment actions, reinvestment metrics, timeline for site-use decisions, and structured engagement. • Provide a clear narrative showing how consultation led to changes, and where justified decisions were made not to change proposals, supporting Members' understanding and transparency.

Executive Summary (2/2)

The table below summarises the original proposal themes, the feedback received during consultation, and the resulting impacts. This provides Members with a clear, visual overview of how stakeholder input has shaped the evolution of the proposals and how the programme has strengthened its evidence base and governance readiness.

Phase 2 confirms that the programme has moved beyond delivering consultation materials into a structured, evidence-based consideration phase. Subject to final documentation refinements, the programme is positioned to present a transparent, defensible evidence base to support Fire Authority decision-making.

Original Proposal / Theme	Feedback Received & Consideration	Response / Proposed Impact
Removal of selected On-Call appliances	Mixed consultation response. Staff highlighted operational realities like mixed crewing and improving availability. ORS findings show higher opposition among members of the public, noting concern around resilience and response times.	Proposal has been refined following review of operational data. Buckingham on-call appliance likely retained and there is consideration of keeping one appliance as a strategic reserve to maintain resilience and flexibility.
Closure of Great Missenden & Stokenchurch stations	Focus groups and staff largely accepted closure due to prolonged lack of crewing, though written submissions raised future growth concerns.	Proposal broadly unchanged. Defer decisions on future site use pending targeted engagement. Equality and rural-impact analysis being strengthened to evidence minimal operational impact and provide clearer rationale for decision-makers.
Replacement of fire engines with specialist vehicles	Support for quicker, risk-appropriate response vehicles, but concern that specialist appliances should complement rather than replace traditional pumps.	Messaging refined to emphasise operational flexibility and reinvestment. Additional explanation to be included in final paper on capability differences and training implications.
Operational independence for Chief Fire Officer	Feedback indicated confusion and strong concern around governance and accountability. Staff and stakeholders felt this issue should be separate from the on-call proposals.	Operational independence proposal likely removed from final recommendations to reduce conflation with On-call Improvement Programme changes and mitigate governance risk.
Growth and future risk assumptions	Consultation raised concerns about housing growth and long-term risk beyond CRMP timeframe.	Additional data-led analysis undertaken to validate assumptions with expanded incident projections beyond dwelling fires. Evidence to be incorporated into final decision narrative.
On-Call recruitment and perceived underinvestment	Strong theme from staff and submissions that availability challenges are due to longstanding organisational underinvestment rather than structural issues.	Financial narrative in paper shifting toward visible reinvestment and service improvement actions, i.e. recruitment, retention, welfare, training.
Equality and rural community impacts	Concerns about older and rural communities experiencing disproportionate impacts.	Equality Impact Assessment (EIA) being updated. Final paper should include clearer articulation of impacts, mitigations, and rationale.
Consultation process and engagement approach	Criticism of timing (consultation over the Christmas period) and communication channels. Some respondents felt decisions were pre-determined.	Programme documenting engagement activity, benchmarking consultation length, and strengthening narrative on how feedback has influenced changes.
Reinvestment expectations	Stakeholders expected visible reinvestment if assets reduced.	Financial methodology and associated metrics refined in final decision paper. Reinvestment framing to emphasise service improvement outcomes rather than budget savings.

Section 3:
Observations and Improvement Opportunities

Conscientious Consideration
Observations and Areas of Improvement

Observations/ Insights	RAG	Improvement Opportunities

• The project team has implemented a structured methodology to analyse consultation findings, including a review of the ORS report, with:
   • Identification of material issues
   • Re-examination of assumptions/modelling leading up to the consultation
   • Specific weighting of substantive concerns (including minority views)
   • A commitment to update the Equality Impact Assessment (EIA) and set out what changed and why in the final decision paper.
 	
• Evidence of the outlined approach is captured through a working 'themes-to-actions' Excel tracker, mapping concerns to considerations and responses/changes across key themes. Stakeholder groups, and the rationale / explanation, including any further work/analysis carried out is also documented. This demonstrates active engagement with consultation outcomes rather than retrospective justification of pre-determined decisions.
 	
• The ORS report provides independent, methodical reporting of open questionnaire results, focus groups (residents, staff, wider stakeholders), drop-ins, and submissions, forming a defensible basis for consideration. There were high levels of engagement with 956 questionnaire responses; in-person and virtual focus groups totalling 55 attendees; 72 attendees at drop-ins. The report also explicitly explains the nature of consultation and accountability standards, describing how it meets best practice, strengthening assurance over process integrity.
 	
• Responses included mixed views on the proposals with a clear variation between public and staff perspectives. While feedback was not formally weighted, operationally informed staff and sector views were naturally treated as more technically significant where relevant, given their direct understanding of risk and service delivery. At the same time, detailed public feedback was systematically captured through the themes-to-actions tracker to demonstrate that all viewpoints were fully considered as part of the decision-making process.
   • This tracker is the core audit trail evidencing conscientious consideration, as decision-makers showed they 'conscientiously took into account' consultation responses before any decision, including a transparent audit trail of issues raised, analysis undertaken, and how this informed the final recommendations in the paper presented to the Senior Leadership Board for formal internal sign-off early March, followed by Fire Authority decision mid-March.
 	
• On balance, there is evidence of a structured 'conscientious consideration' process with traceability from issues raised to responses and, at times, changes. Completion quality will ultimately rest on how clearly the final decision paper evidences the linkage between the tracker, EIA updates, and the final recommendations. We therefore consider Gunning Principle 4 (see Appendix 1) is being addressed, subject to final documentation and sign-off steps in March 2026.
	🟩	• Complete the updated EIA and integrate its key findings directly into the final decision report to demonstrate how equality-related concerns, particularly those affecting rural and vulnerable communities, have been assessed and addressed as part of the decision-making process.
		
		• The updated EIA should:
		   • Set out differential impacts by geography and demographic characteristics (rurality and age).
		   • Identify and describe mitigations such as cover mapping, communications, and station-level engagement.
		   • Commit to post-implementation monitoring, including how equality impacts will be tracked, reported and escalated if required.
		
		• Given the volume and variety of evidence sources, produce a concise, integrated summary of the consultation evidence (quantitative + qualitative) within the decision paper, highlighting key themes, patterns and divergence, i.e. differences between public and staff perspectives, so Members can clearly see the breadth and reasoning behind stakeholder views. This strengthens Gunning Principle defensibility.

Impact of Feedback on Proposals
Observations and Areas of Improvement

Observations/ Insights	RAG	Improvement Opportunities

Observations/ Insights

- The key themes and the Service's high-level responses are detailed below, including analysis of responses and subsequent changes to proposals:
  1. **Growth & future risk:** Respondents questioned whether proposals account for long-term housing/infrastructure growth and emerging risks. The Service added growth analysis and a placeholder estimated incident uplift calculation to its evidence pack, concluding that no present change is warranted but flagging the need to monitor distribution of risk.
  2. **Asset reduction & resilience:** Concerns focused on response times, reduction in resilience, and over-reliance on neighbouring/OTB services. The Service reconfirmed that the seven targeted on-call appliances contributed ~38 attendances out of ~9,827 last year (≈0.39%) and explored a 'strategic reserve' to retain one removed appliance for resilience.
  3. **Buckingham on-call appliance:** Internal/staff concerns (mixed-crewing effects, station's strategic geography, recent availability improvements, pipeline value for day-crewed staffing) led the Service to remove Buckingham on-call appliance from the removal list and consider dual-use (Type B/RFV) crewing.
  4. **Operational independence:** Feedback indicated confusion and perceived conflation with the on-call proposals. Staff and stakeholder groups raised accountability concerns. The Service is not proposing changes to the scheme of delegation at this stage, noting likely national policy movement and retaining evidence for future consideration. This prevents the risk of implementing a decision that may need to be reversed.
  5. **Rural and vulnerable groups:** Concerns centred on rural response times and elderly populations. The Service plans to update the EIA and confirmed that the two proposed station closures have not provided an operational response for years. Through analysis, rural response times remain within expected profiles given whole-time cover patterns. Evidence of the updated EIA was still outstanding at the time of the review.
  6. **Consultation process criticisms:** Some viewed timing and channels as sub-optimal, Phase 1 of the report and the ORS report nevertheless set out how the consultation meets good practice requirements (formative stage, sufficient time/information, transparent reporting). Additional benchmarking has been carried out and OIP intends to summarise the process transparently with appropriate justifications in the final paper.
  7. **Future of station sites:** Respondents requested clarity on future use of proposed closed stations. The Service is considering decoupling cessation of permanent fire cover from site decisions to allow targeted community engagement on the future of the sites.
  8. **Reinvestment:** Staff and the public asked that any asset rationalisation be matched with visible reinvestment (on-call recruitment, facilities, training, welfare). The Service proposes clearer reinvestment narrative and accompanying financial methodology in the final paper, recognising that most savings will be one-off in nature, and that many on-call operational improvements require ongoing revenue funding.
  9. **On-call sustainability:** Some respondents argued that low availability stemmed from longstanding issues in recruitment, management support and wider organisational investment to the on-call model rather than structural factors. While this feedback related to broader on-call issues rather than the proposals, the Service revisited these assumptions and confirmed that maintaining all 18 appliances would remain operationally ineffective and financially unviable. It has committed to strengthening future recruitment and wider on-call improvement activity.

- While no new modelling was done, there is credible evidence that several consultation themes and further data-led validation and analysis drove tangible and reasonable changes to the emerging recommendations. We consider this line of sight appropriate and traceable, subject to the final decision paper explicitly cross-referencing each change to the originating feedback themes.

Improvement Opportunities

- Ensure the final paper clearly links each proposal change to the specific consultation feedback that informed it, explains any representativeness limitations of the questionnaire, and sets out key modelling assumptions and caveats, including late data updates such as recent availability trends. This will reinforce demonstrable conscientious consideration and ensure Members have full visibility of underlying assumptions to avoid misinterpretation.

- Develop structured forward plans codifying:
  - The governance and planned activation arrangements for the strategic reserve appliance,
  - Buckingham dual-use operating model: set out the competency maintenance plan, mixed-crewing guardrails, and success measures (availability, second appliance response, training attendance).
  - Strengthened recruitment and development measures to address longer-term on-call challenges with a proposed timeline.

- Set out a clear implementation plan for changes, reinvestment priorities and metrics, the future engagement process for station sites, and lessons learned from the consultation process, ensuring stakeholders understand both how feedback shaped the proposals and how delivery will be phased and managed.

Appendix

Appendix 1

The Gunning Principles

They were coined by Stephen Sedley QC in a court case in 1985 relating to a school closure consultation (R v London Borough of Brent ex parte Gunning). Prior to this, very little consideration had been given to the laws of consultation. Sedley defined that a consultation is only legitimate when these four principles are met:

1. Proposals are still at a formative stage: A final decision has not yet been made, or predetermined, by the decision makers.
2. There is sufficient information to give 'intelligent consideration': The information provided must relate to the consultation and must be available, accessible, and easily interpretable for consultees to provide an informed response.
3. There is adequate time for consideration and response: There must be sufficient opportunity for consultees to participate in the consultation. There is no set timeframe for consultation,[1] despite the widely accepted twelve-week consultation period, as the length of time given for consultee to respond can vary depending on the subject and extent of impact of the consultation.
4. 'Conscientious consideration' must be given to the consultation responses before a decision is made: Decision-makers should be able to provide evidence that they took consultation responses into account

These principles were reinforced in 2001 in the 'Coughlan Case (R v North and East Devon Health Authority ex parte Coughlan[2]), which involved a health authority closure and confirmed that they applied to all consultations, and then in a Supreme Court case in 2014 (R ex parte Moseley v LB Haringey[3]), which endorsed the legal standing of the four principles.

Since then, the Gunning Principles have formed a strong legal foundation from which the legitimacy of public consultations is assessed and are frequently referred to as a legal basis for judicial review decisions.[4]

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1 In some local authorities, their local voluntary Compact agreement with the third sector may specify the length of time they are required to consult for. However, in many cases, the Compact is either inactive or has been cancelled so the consultation timeframe is open to debate.
2 BAILII, England and Wales Court of Appeal (Civil Decision) Decisions, Accessed: 13 December 2016.
3 BAILII, United Kingdom Supreme Court, Accessed: 13 December 2016.
4 The information used to produce this document has been taken from the Law of Consultation training course provided by The Consultation Institute.

Source: Local Government Association. The Gunning Principles. Available at: https://www.local.gov.uk/sites/default/files/documents/The%20Gunning%20Principles.pdf
(Accessed: 4 December 2025).

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Appendix 2

Documents Reviewed & Stakeholders Interviewed

Documents reviewed

1. Opinion Research Services (Feb 2026): On-Call Improvement Programme Consultation – Report of Findings
2. Considerations of Consultation Themes Excel Tracker
3. Consideration of Final ORS Report/Process Email
4. Final Deadlines Document

Stakeholder Interview

Name	Role
Matty Burn	Group Commander On-Call Development Programme