

Adopting the NFCC Code of Ethics and proposing "service first" values for LFB

Report to:

Date:

Programme Five Board
Commissioner's Board
London Fire Commissioner

Tuesday 19 September
Wednesday 18 October
Wednesday 18 October

Report by:

Lewis Coakley, Head of Culture and Organisational Development

Report classification:

For decision

For publication

I agree the recommended decision below.

A handwritten signature in black ink, appearing to read 'Andy Roe'.

Andy Roe

London Fire Commissioner

Date This decision was remotely signed on 06 December 2023

PART ONE

Non-confidential facts and advice to the decision-maker

Executive Summary

This report proposes that the London Fire Commissioner (LFC) adopts the National Fire Chief Council (NFCC) Code of Ethics and adopts the values below. These values are "public service first" and are proposed based on extensive engagement with community leaders and staff.

Recommended decision(s)

That the London Fire Commissioner **APPROVES** the adoption of the National Fire Chief Council (NFCC) Code of Ethics (item 4.1)

That the London Fire Commissioner **APPROVES** the proposed London Fire Brigade values (item 4.2).

1 Introduction and background

1.1 In May 2021, the National Fire Chief Council (NFCC) released the Code of Ethics which was adopted by the Fire Standards Board (FSB) also in May 2021, becoming a national fire standard all Fire and Rescue Services (FRS') in England would be expected to adopt.

1.2 On 27 July 2022, in a Cause of Concern (CoC) on culture and values, His Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS), informed the London Fire Brigade (Brigade) that

"we found evidence of behaviours that are not in line with brigade values, including discrimination and bullying. Brigade values and behaviours are not always demonstrated by senior leaders. By 31 August 2022, the Brigade should develop an action plan to:

- *communicate brigade values to staff effectively, making sure that they understand and can demonstrate acceptable behaviours at all times;*
- *ensure it communicates with managers at all levels, so they demonstrate brigade values through their positive workplace behaviours and are trained to identify and deal with non-compliance; and*
- *undertake a review of brigade processes designed to deal with behaviour such as bullying and discrimination and implement improvements that build trust and confidence among staff."*

- 1.3** On 28 November 2022 the London Fire Commissioner announced the acceptance of all the recommendations contained in the independent review of the Brigade's culture, led by Nazir Afzal. This included a specific recommendation about the creation of a set of Brigade values which are "*public service first*". The outcome defined by Afzal stated that values must "*be visible in everything, from the most strategic plans through to staff appraisals. They must run as a golden thread through recruitment, promotion, discipline, talent management, industrial relations, staff engagement. All of which must be transparent and open to challenge*".
- 1.4** On 14 December 2022 the Brigade was placed in enhanced monitoring by HMICFRS, stating in their press release "values and behaviours the Brigade aspires to are not always demonstrated by senior leaders, and the Brigade needs to do more to demonstrate progress in improving its culture". It is important to note, however, that change has not waited for the values to be finalised, for example extensive reviews of the Brigade's HR policies and procedures has already begun, using the Code of Ethics. Following the publication of the Culture Review a comprehensive process of staff engagement commenced, using the NFCC Code of Ethics and Brigade behaviours as the starting point having conversations (LCCS). This has resulted in senior staff attending watches and teams, and staff engagement and briefing events and over 300 staff attending the Brigade's Your LFB, Your Voice conference to discuss the results of the Culture Review.
- 1.5** This report tackles each element of the background outlined above, namely to:
- a) adopt the NFCC Code of Ethics;
 - b) create a set of values / respond to the CoC;
 - c) create a set of values which are "public service first"; and,
 - d) to demonstrate how the values will drive change.
- 1.6** Following discussion and approval by the Programme Board (for programme five), Commissioner's Board is invited to:
- a) approve the adoption of the NFCC Code of Ethics (item 4.1)
 - b) approve the proposed Brigade values (item 4.2)

2 Objective

- 2.1** The report will outline the approach taken to create the values, outline the engagement with community leaders and staff to achieve this result and share the next steps to implement the values.

Engagement approach with the values

- 2.2** In order to create a set of values which are based on the NFCC Code of Ethics which are "public service first", a programme of listening to community and staff voices was created. Through a mix of face-to-face workshops, open submissions which all staff were invited to share and through analysis of other sources of employee feedback the final statement of recommended values was created. The three elements are briefly outlined below.

Face to face workshops

- 2.3** Face to face workshops have been held with community leaders and with staff.

- Values discussions were held with the Community Forum, made up of community leaders with feedback captured during the meeting. In addition, the values were also discussed at a community engagement event with deaf and disabled Londoners (c.50 people attended). The feedback from these sessions has shaped the proposals outlined at 4.2.
- In total, 16 workshops were held with c.270 employees across all occupational groups and all ranks and grades. The workshops largely focused on the question of what the Brigade looked like at its best, with employees being asked to articulate their best moments. This approach follows a simple organisational development technique¹. Comments were collected and then analysed for patterns with the key themes (or sentiment) presented to Programme 5 Board, the comments were cross-referenced to NFCC Code of Ethics to conduct a gap analysis between the views received and the code. A small number of workshops were held in which wording options were presented. From these sessions feedback on both content and application was received and factored into the final proposals.

Open Submissions

- 2.4** Employees were invited to share their case studies around their best experiences in writing using an online form. This was circulated in the weekly update in August 2023 and publicised in an article on Hotwire.

Analysis of sources of employee feedback

- 2.5** Over 8,000 comments were received from the 2023 Your LFB, Your Voice staff survey. Comments from the People Award nominations were also considered in the design of the values. An analysis of the comments was shared in August 2023 and has shaped the values.
- 2.6** Throughout January to June 1,065 and 659 employees attended two phases of Leading Culture Conversation, led by Leadership Academy. The feedback from these conversations was coded and shared in presentations. Analysis of the presentations both aligned with and has helped shape the final values proposals.

Additional feedback

- 2.7** A number of 1:1 meetings were held with stakeholders, these are listed at appendix 1 and have informed the production of the values.
- 2.8** In addition to the values workshops, the author also attended an Operational Debrief session and reviewed the previous operational debrief outcomes in the debrief log, held by Operational Policy and Assurance. The discussion at the debrief and the review of the log have informed the production of the values.

Overview of the findings

- 2.9** Following analysis of the findings, a number of themes emerged (spread over the engagement period). These include:
- a strong finding that 'at our best', Brigade staff are highly skilled and trained and look for opportunities to learn, grow and adapt. At our best, learning is also organisational with the Brigade making changes to improve following issues (REF: operational debrief).

¹ <https://coachingleaders.co.uk/what-is-appreciative-inquiry/>

- that at our best, staff work together and support each other to deliver critical services. This was felt in all part of the organisation and was a strong motivator for people joining the Brigade. A sense of camaraderie ensured that people both looked out for each other and also went above and beyond.
- That modesty or humility is important to many staff, who rejected the 'heroic' model of a firefighter. People in all occupational groups are proud to work for the Brigade, but are modest with it.
- That at our best, staff are both courageous in a physical sense but also in a moral sense. We put ourselves at risk, in order to do the courageous thing – this might be speaking out, it might be running into an incident – but the Brigade attracts the courageous.
- That across the Brigade, people care passionately about what they do because they know it makes a difference and that they are at their best when they understand the impact of their work and feel valued for it.
- A strong finding that the best moments for staff in different functions was where they were given the autonomy to get the job done – often to a high standard, but without undue bureaucracy or interference. This was as powerful for the firefighter at an incident ground as it was to a senior leader.
- That at our best, staff would be either directly serving or interacting with communities or indirectly helping others to do that. Multiple examples were offered instinctively of putting the interests of the community first. Staff were frustrated when this was not possible.
- That in response to the Equality, Diversity and Inclusion (EDI) value presented in the NFCC Code of Ethics, the elements that resonated most with staff were about difference being seen as a strength and then being celebrated. Discussions also touched on the importance of 'equity' in outcome as opposed to equality of process.
- That at our best, there is a strong sense of camaraderie or "family" which fosters loyalty in teams. This was present in multiple teams, not just fire stations. There was recognition that this strength could be a negative for some individuals as it was interpreted as allowing unacceptable behaviour to set in.

3. Implementation and further work

3.1 The Programme Five Board will recommend a full implementation plan, prepared by the Communications Directorate, for the Deputy Commissioner and relevant Directors to authorise and implement, this will include:

- Support for Heads of Service to embed the values in their areas of responsibility ensuring values-based change is present in all functions, not solely HR – this will happen in partnership with HR Business Partners;
- Corporate initiatives including a pledge signing, discussions with watches and teams on the meaning of the values to them and other communications and branding initiatives, this will happen in partnership with the Leadership Academy.

3.2 Key changes to the provision of HR services, a central element of the outcome defined by the Culture Review, will include:

- Reviewing and aligning HR policies to incorporate new values and ensure the target behaviours are driven through the organisation;
- Developing an Employee Value Proposition articulating who we are, Brigade values and behaviours and how we work;
- Developing an induction programme for all employees based on Brigade values;
- Improving Experience Days, based on values;
- Embedding values across the Brigade using business partners, subsequently embedding the approach to business partnering itself;
- Reviewing approaches to appraisal, talent management and succession planning in line with the values; and,
- Aligning proposals around pay and reward with the values.

4 Recommendation(s)

4.1 To adopt the NFCC Code of Ethics, which are:

- **Putting our Communities First:** we put the interest of the public, the community and service users first
- **Integrity:** we act with integrity including being open, honest and consistent in everything we do
- **Dignity and Respect:** making decisions objectively based on evidence, without discrimination or bias
- **Leadership:** we are all positive role models, always demonstrating flexibility and resilient leadership. We are all accountable for everything we do and challenge all behaviour that falls short of the highest standards
- **Equality, Diversity and Inclusion:** We continually recognise and promote the value of EDI both within the FRSs and the wider communities in which we serve. We stand against all forms of discrimination, create equal opportunities, promote equality, foster good relations, and celebrate difference.

4.2 To accept the proposed six LFB values, which are:

- **Service:** we put the public first
- **Integrity:** we act with honesty
- **Equity:** we treat everyone fairly according to their needs
- **Teamwork:** we work together and include everyone
- **Courage:** we step up to the challenge
- **Learning:** we listen so that we can improve

These Brigade values are words – but they will – wherever possible – be supported by stories. We recognise that the words on their own can't convey the heart of LFB; more is needed to bring that to life. Some examples are shown below.

4.3 Once agreed, the Communications and Engagement Directorate will work to communicate the values to the communities we serve and to staff in a way that is memorable, practical and inspiring.

4.4 In order to express the power of the stories shared through the creation of the values, some of the examples collected are shown below, aligned to the value they represent.

Table 1: Values-Based Stories Shared by Staff (using their words where possible)

Value	Stories
Service is....	<ul style="list-style-type: none">• Firefighters engaging with a local Mosque, showing respect on their visit and seeing what a privileged position we hold in the community• Diving into a pool on holiday to rescue a child who had stopped breathing, using your training to revive her (<i>this demonstrates serving outside of work</i>)• Pushing the wheelchair of an 89-year-old man out of a house in wildfires, shortly before it burns down.

	<ul style="list-style-type: none"> • Supporting a member of the public who had been stabbed to stop the bleeding, not knowing whether the attacker would return • There's 100 people at Control and we take 600 calls a day – there isn't any part of London this team doesn't reach. • Applying pressure to a member of the public who had their throat slit, ultimately saving their life • An elderly man coming to tell you that his mother had passed away after you met her on a Home Fire Safety Visit recently. • Deploying to Turkey, Malawi and other international sites as part of International Search and Rescue, to save life in different parts of the world (<i>this demonstrates being part of a global community</i>) • Installing new, faster appliance bay doors which improves the response time of the engines • Just knowing that you helped, that you made a difference.
Courage is...	<ul style="list-style-type: none"> • Asking 200 firefighters to go above the fire at a big job and no-one saying no and every staff member getting out. • Having a quiet word with someone the first time they step out of line. • Deciding to take a member of the public who needed a blood transfusion in the truck to the hospital, knowing that it might get you in trouble.
Integrity is...	<ul style="list-style-type: none"> • Using the right equipment to get the job done and not having to bowl out hose you don't need • Like at the Riots when you were trusted to get on with it, where you didn't have to wait for commands. • Seeing firefighters engaging with community members on Home Fire Safety Visits – staying longer than they need to, talking to vulnerable people • Being able to propose a major change to how the Brigade works only six months in and have that approved, based on your knowledge and experience • Receiving visits from politicians and VIPs and being trusted to say the right thing • Being asked "what do you need?" instead of being told "you should have done this" at an incident by a senior officer – this shows they trust me to get the job done • During the Riots, using your training to decide which of the incidents you need to solve in-front of you • Every day at Control you're responsible for deciding how to use millions of pounds of equipment and resources, we're trusted with that responsibility. • Knowing the watches in nearby stations and making a beeline for the people you know are trained well on a job
Teamwork is...	<ul style="list-style-type: none"> • Doing 127km on the day of the wildfires when we normally do 10km. We had no reliefs, we just had to keep going, just thinking about the safety of the team on the hottest day of the year. • Seeing FRS teams working together during the wildfires, with a clear purpose. Barriers between teams were broken down. • Feeling part of a team at the People Awards, seeing the breadth of what we do and feeling proud. • Starting each shift with tea and toast, just checking in with each other.

	<ul style="list-style-type: none"> • Attending a Borough Training Day where we did team-building exercises – we did zip-lines, blindfold trust activities and had a barbecue – one of the best days in the Brigade. • Your teammates from Control running back to work during the Wildfires last year to help serve and protect London • Still knowing your squad from training school from back in the day • Being trusted to play volleyball after doing your drills and HFSVs to unwind as a team. It's good for the team and for mental health • "I would put my life on the line for my watch, they make me feel like I belong in the brigade" (People Survey Comment)
Learning is...	<ul style="list-style-type: none"> • Seeing the care and professionalism of our cadets doing roll-call and seeing our staff volunteer to support them • Organising a visit for Counselling and Trauma Services to a Fire Station to go and look at the engine and equipment so they could relate better to operational staff when working with them • Being stood at the end of the line during the wildfires, learning quickly from others • Handing down knowledge you don't get taught in training school • Creating a psychologically safe environment to discuss organisational learning following in a performance review of command • Being asked to support other GLA organisations because what we do is sector-leading • Adapting how you do things to support the FF(D) and recognising that trainees help you learn too, because it's dynamic.
Equity is..	<ul style="list-style-type: none"> • When an FRS staff member went to Bethnal Green Fire Station and was able to speak to local members of the public in Urdu, engaging with members of the local community and translating fire safety advice. • Being taken to one side after a job and being thanked for what you did • When a woman is rescued from being trapped in a lift and is hugely anxious and only calms down when a woman firefighter is able to support her – using the diversity of the watch as a strength. • Helping a Trainee Firefighter realise that their ability to speak Spanish was an asset to the team

3. Equality comments

- 3.1** The LFC and the Deputy Mayor for Fire and Resilience are required to have due regard to the Public Sector Equality Duty (section 149 of the Equality Act 2010) when taking decisions. This in broad terms involves understanding the potential impact of policy and decisions on different people, taking this into account and then evidencing how decisions were reached.
- 3.2** It is important to note that consideration of the Public Sector Equality Duty is not a one-off task. The duty must be fulfilled before taking a decision, at the time of taking a decision, and after the decision has been taken.
- 3.3** The protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership (but only in respect of the requirements to have due regard to the need to eliminate discrimination), race (ethnic or national origins, colour or nationality), religion or belief (including lack of belief), sex, and sexual orientation.

- 3.4** The Public Sector Equality Duty requires decision-takers in the exercise of all their functions, to have due regard to the need to:
- eliminate discrimination, harassment and victimisation and other prohibited conduct.
 - advance equality of opportunity between people who share a relevant protected characteristic and persons who do not share it.
 - foster good relations between people who share a relevant protected characteristic and persons who do not share it.
- 3.5** Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:
- remove or minimise disadvantages suffered by persons who share a relevant protected characteristic where those disadvantages are connected to that characteristic.
 - take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it.
 - encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
- 3.6** The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.
- 3.7** Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:
- tackle prejudice
 - promote understanding.
- 3.8** The adoption of a set of Brigade values which will underpin future decision making is made in response to regulatory and other requirements. The inclusion of specific language which places the community first in Brigade decision making and centres inclusivity and equity in the process will be beneficial in demonstrating due regard as required with the Public Sector Equality Duty.
- 3.9** An EIA has been attached to this document, however, it should be noted that the approval of the values in and of themselves creates no change. It is onward adoption of the values through Brigade systems and processes that will lead to values-based change. Each future change should be considered with an EIA, the document attached to this paper reinforces this position, including the actions listed.

4 Other considerations

Workforce comments

- 4.1** Trade Unions were initially consulted for their feedback on early proposals in May 2023, which resulted in taking a different approach and conducting more staff engagement. The values proposals were submitted to Trade Unions on Friday 15 September 2023, no feedback was received at the close of the consultation. The Brigade will continue to work closely with the Trade Unions as part of the implementation of the values.
- 4.2** Equality Support Groups (ESGs) were consulted for their feedback, as representatives of staff with different protected characteristics, on Friday 22 September 2023 and their feedback has been incorporated into the draft. The Brigade will continue to work closely with the ESGs as part of the implementation of the values.

Sustainability comments

4.3 No impact based on the adoption of the values per se.

Procurement comments

4.4 The approval of the values and adoption of the Code of Ethics does not in and of itself require the procurement of any product or service. As a result of the implementation of the values, there may be requirements on teams across the Brigade and these will in turn require separate decisions and procurement support.

Communications comments

4.5 A comprehensive communications plan for the launch and implementation of the Brigade values is being produced, in anticipation of approval. This will be overseen by the Director of Communications and consider relevant communications objectives.

5. Financial comments

4.6 This report recommends that the LFC adopts the NFCC Code of Ethics and approves the proposed LFB Values. Paragraphs 3.1 and 3.2 of the report sets out items which will be considered as part of the implementation plan, as well as key changes to HR services. Any revenue costs as a result of those items will be contained within existing budgets in the 2023/24 financial year.

6. Legal comments

6.1 Under section 9 of the Policing and Crime Act 2017, the London Fire Commissioner (the "Commissioner") is established as a corporation sole with the Mayor appointing the occupant of that office. The Mayor may issue to the Commissioner specific or general directions as to the manner in which the holder of that office is to exercise his or her functions.

6.2 Section 21(7) of the Fire and Rescue Services Act 2004 requires the Commissioner to have regard to the Fire and Rescue National Framework for England (the "Framework") in carrying out their functions. The framework requires that the Commissioner "to have in place a people strategy that has been designed in collaboration with the workforce. This should take into account the principles set out in the NFCC's people strategy" covering, amongst other matters, "equality, cultural values and behaviours".

6.3 The NFCC's People Strategy sets out six key areas, the first of which is, "Strengthen Leadership and Line Management to support organisational change and improved community outcomes". The action plan for this area identifies the following strategic objective, amongst others, for this area, "Maintaining public trust in our Services through ethical, honest and accountable leadership" and details that this objective incorporates the need to, "Adhere to the NFCC Code of Ethics and we will feature in all our leadership training, person specifications and disciplinary process (plus local FRA policies)".

6.4 This report seeks the LFC's approval to adopt the NFCC Code of Ethics as well as adopt the proposed London Fire Brigade values set out in this report.

List of appendices

Appendix	Title	Open or confidential*
1	Engagement and Sources of Data	Open
2	Extract from the Fire Standards Board	Open

Appendix 1: Engagement and sources of data

	Engagement	No of People	Date(s)
1	Community Forum Engagement meeting on Values	9	Tuesday 9 May
2	Community Engagement meeting with Deaf and Disabled Peoples Organisations	c.50	Monday 5 June
3	Trade Union Engagement meeting on Values	8	Wednesday 16 August
4	Values workshop with Shoreditch Fire Station	5	Wednesday 13 September
5	Values workshop with Dockhead Fire Station	5	Friday 8 September
6	Values workshop with Orpington Fire Station	c.10	Thursday 14 September
7	Values workshop with Brixton Fire Station	c.8	Thursday 24 August
8	Values workshop with Wembley Fire Station	c.8	Monday 11 September
9	Values workshop with Richmond Fire Station	c.5	Thursday 31 August
10	Values workshop with DAC Ops group	c.5	Wednesday 13 September
11	Values workshop with Station Commander Forum (South East)	c.16	Wednesday 16 August
12	Values workshop with Control	c.9	Tuesday 12 September
13	Values workshop with the Commissioner and Directors	8	Monday 11 September
14	Values Workshop with Communications Directorate	c.40	Tuesday 6 June
15	Values Workshop with Fire Stations Area Teams	c.50	Monday 19 June
16	Values Workshop with Top Management Group	c.35	Thursday 6 July
17	Values Workshop with Property and TSS Group	c.30	Thursday 21 September
18	Values Workshop with Procurement and Commercial Department	c.26	Wednesday 30 August
19	Values Workshop with Equality Support Groups (including members), Positive Improvement Team and Inclusion Team	c.10	Thursday 7 September Tuesday 12 September
20	Operational Incident Review meeting	c.10	Monday 31 July
21	Analysis of People Survey (2023) comments	c.8,000	September 2023
22	Analysis of the People Awards (2023) nominations	c.200	September 2023
23	Review of Operational Discretion Log	-	August 2023
24	Review of Your LFB, Your Voice Conference output	c.300	September 2023
25	Leading Culture Conversations report (part one)	1,065	August 2023
26	Leading Culture Conversations report (part two)	659	August 2023
27	Case Studies submitted via open call for requests	17	September 2023
28	Individual meeting: General Counsel	1	September 2023
29	Individual meeting: Professional Head of Portfolio	1	September 2023
30	Individual meeting: Assistant Commissioner Operational Policy and Assurance	1	September 2023
31	Individual meeting: DAC for Central Operations	1	August 2023
32	Consultation with Trade Unions	1	October 2023
33	Consultation with ESGs	3	October 2023

Appendix 2: Extract from the Fire Standards Board ²

From "what is required to meet the Fire Standards"

A fire and rescue service must:

1. Adopt and embed the Core Code to demonstrate that the service is fully committed and compliant at both an individual and corporate level.
2. Ensure the attitudes, professional behaviours and conduct described within the core code are reflected in its decision-making, policies, procedures, processes, and associated guidance that govern how the service manages and supports its workforce.
3. Provide training and support to all those who work for, or on behalf of, a service to achieve their understanding of the Core Code and an appreciation of their responsibilities in adhering to it.
4. Not detract from the Core Code.

Those who lead services and those who work for, or on behalf of, the service must:

5. Understand, respect, and follow the principles of the Core Code and demonstrate this by their commitment to it and their responsibility for upholding it.
6. Conduct themselves in accordance with the Core Code.

Those responsible for the governance of fire and rescue services, whilst complying with their own ethical codes must:

7. hold the Chief Fire Officer to account for the implementation of the Core Code at a local level;
8. play a proactive role in challenging behaviour inconsistent with the Core Code; and
9. ensure strategies, policies and performance measures are in place to promote and embed a positive and inclusive culture.

A fire and rescue service should:

10. Designate a senior leader who is responsible for promoting the Core Code throughout the service and ensuring that all those who work for, or on behalf of, the service understand its contents and what is expected of them.

² <https://www.firestandards.org/standards/approved/code-of-ethics-fsc-eth01/>

Originating officer declaration

Reporting officer to confirm the following by using 'x' in the box:

Reporting officer [Report author] has drafted this report and confirms the following:	
1. Assistant Director/Head of Service Helen Coleman has reviewed the documentation and is satisfied for it to be referred to Board for consideration	X
2. Advice The Finance and Legal teams have commented on this proposal: Thomas Davies, Legal Advisor , on behalf of General Counsel (Head of Law and Monitoring Officer). David O'Sullivan, Financial Advisor , on behalf of the Chief Finance Officer.	