

To: Cambridgeshire and Peterborough Fire Authority

From: Deputy Chief Executive Officer - Matthew Warren

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## National Fire Chiefs Council (NFCC) Core Code of Ethics for Fire and Rescue Services – Revised Code of Conduct for Employees

### 1. Purpose

- 1.1 The purpose of this report is to update the Fire Authority on; the launch of the NFCC's Core Code of Ethics for Fire and Rescue Services ('Core Code'), the gap analysis work of the Core Code undertaken against the Authority's existing relevant policies and corporate documents and to present a draft revised Code of Conduct for Employees which ensures explicit reference and alignment to the principles of the NFCC's Core Code.

### 2. Recommendations

- 2.1 The Authority is asked to note and endorse:
  - 2.1.1 the contents of this report and of the gap analysis undertaken (Appendix 1)
  - 2.1.2 the implementation by the Chief Fire Officer of the revisions made to the Code of Conduct for Employees, which ensures explicit reference and alignment to the NFCC's Core Code.

### 3. Risk Assessment

- 3.1 Political – The NFCC's Core Code results from the recommendations made in the first State of Fire report published by Sir Thomas Winsor in January 2020 and re-enforced in the most recent report published in March 2021.
  - 3.1.1 Sir Winsor makes clear his expectation that the Core Code will be adopted by all English fire and rescue services. This expectation is also explicitly set out in the guidance document that accompanies the Core Code, which is published jointly by the Local Government Association (LGA), the NFCC and the Association of Police and Crime Commissioners (APCC). The guidance document also sets out an expectation that fire and rescue services will undertake a gap analysis of the Core Code against existing corporate policies and documents, behavioural frameworks, values, and cultural approaches.

- 3.1.2 There is therefore significant political risk in failing to demonstrate that a proper gap analysis has been undertaken and the Core Code has been appropriately adopted/integrated into existing corporate documents.
- 3.2 Social - explicit integration of the Core Code into our existing Code of Conduct for Employees will demonstrate to our communities and to our staff that at all times we put the interests of the public, the community and service users first. As the guidance document indicates, the principles of the Core Code will help all of us do our jobs in the right way.
- 3.3 Legal – compliance with our existing Code of Conduct is written into all (individual) contracts of employment and therefore any amendments to the Code of Conduct become incorporated into said contracts.

#### 4. Background

- 4.1 The context that has led to the publication of the NFCC's Core Code is set out at paragraph 3.1 above. It is based upon the Seven Principles of Public Life ('the Nolan Principles').
- 4.2 An associated Fire Standard has been published by the Fire Standards Board. This states that a fire and rescue service must adopt and embed the Core Code to demonstrate full commitment and compliance at both an individual and corporate level and that the Service must not detract from the Core Code.
- 4.3 The guidance document which accompanies the Core Code makes clear an expectation that each fire and rescue service will initially undertake a gap analysis of the Core Code against existing corporate policies and documents, behavioural frameworks, values, and cultural approaches, in order to ensure that the principles within the Core Code are evident and incorporated within all existing as well as new associated documentation.
- 4.4 Officers have undertaken this gap analysis against existing relevant corporate documents including our Strategic Aims and Excellence Statements, the Integrated Risk Management Plan (IRMP), existing Code of Conduct for Employees, One Team Behaviours and other relevant organisational indicators such as the Commitment to Equality and Diversity. This gap analysis was considered by the Chief Officer's Advisory Group (COAG) in April 2021.
- 4.5 The results of the gap analysis show that no notable gaps were identified. The principles of the Core Code already exist across a range of relevant service corporate documents and indicators.
- 4.6 Given the results of the gap analysis and considering the extent to which existing relevant corporate documents are well-embedded and understood within the organisation, COAG determined that it was not necessary or appropriate to wholesale 'adopt' the Core Code.
- 4.7 Instead, it was agreed to review and update the existing Code of Conduct for Employees, to ensure explicit reference to and integration of the principles of the Core Code. This was one of only two notable opportunities identified from

the gap analysis work and was made as the Code of Conduct for Employees had not been formally reviewed for some time.

- 4.8 The proposed draft new Code of Conduct for Employees, attached at Appendix 2, is shown deliberately with tracked changes to the wording of the current version of the document in order to clearly set out the limited changes made. The majority of insertions made into the document use wording taken directly from either the Core Code or its accompanying guidance document.
- 4.9 Given that the changes to the Authority's Code of Conduct for Employees do not in any way change the underlying principles and they are effectively required by Government, engagement with representative bodies of the changes made will be for information only, rather than a formal consultation.
- 4.10 The second opportunity identified from the review of the gap analysis is to undertake a review of the One Team Behaviours, to sense check that they remain relevant to and understood by staff across the Service. The behaviours were originally developed by and with staff, but noting the significant natural turnover of staff (due to the retirement profile), that has occurred since they were first introduced, work to review the One Team Behaviours will be built into the future IRMP action plan for the remaining period to 2024.

## Source Documents

NFCC Core Code of Ethics for Fire and Rescue Services  
and Accompanying Guidance Document:

<https://www.ukfrs.com/core-code-ethics>

Seven Principles of Public Life <https://www.gov.uk/government/publications/the-7-principles-of-public-life>

Fire Professional Standard – Code of Ethics

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

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## Detailed Gap Analysis of NFCC Core Code of Ethics Against Existing CFRS Corporate Documents and Indicators

NFCC Core Code of Ethics principle/descriptive statement	Gap analysis against current CFRS corporate documents and indicators
<p><b>Community at our Heart:</b> we put the interest of the public, the community and service users first.</p>	<ul style="list-style-type: none"> <li>• Strategic aims include striving for community safety excellence and placing people at the heart of everything that we do - this refers to people in our communities as well as our staff.</li> <li>• Supporting excellence statements say that we continually strive to improve the service we deliver and that we listen and engage with staff, communities and our partners to improve what we do and have a high level of customer satisfaction in our activities.</li> <li>• Code of Conduct states that employees must act in the best interests of service users and the community.</li> <li>• Our Personal and Leadership Development Framework references focusing on the public (under Effective Performance) and on recognising opportunities to improve the Service (Facilitating Improvement).</li> <li>• We have a focus in the people section of our IRMP about removing barriers to people joining our service.</li> </ul>
<p><b>Integrity:</b> we act with integrity including being open, honest and consistent in everything that we do.</p>	<ul style="list-style-type: none"> <li>• Honesty and Trust are two of our One Team Behaviours.</li> <li>• We actively talk about welcoming and encouraging challenge and being willing to adapt our thinking and respond appropriately. Our Respect programme encourages constructive and proactive challenge around inappropriate behaviours and within the One Team Behaviours Honesty we also refer to challenging inappropriate behavior.</li> <li>• We place emphasis on collaborative working relationships, both internally and externally ('We actively seek collaborations' is one of our value for money excellence statements, we also reference fostering a culture of collaborative working in the Personal and Leadership Development Framework effective performance section).</li> <li>• Code of Conduct states that employees must perform their duties with honesty, integrity, impartiality and objectivity, also that they report</li> </ul>

	<p>any impropriety or breach of procedure to the appropriate level of management.</p> <ul style="list-style-type: none"> <li>• Openness, honesty and integrity are key principles covered by our existing Code of Conduct.</li> <li>• Code of Conduct also effectively sets out management of potential conflicts of pecuniary interests.</li> <li>• Personal and Leadership Development Framework references engaging others through trust and allowing them to have a voice (outstanding leadership section).</li> </ul>
<p><b>Dignity and Respect:</b> we treat people with dignity and respect, making decisions objectively based on evidence, without discrimination or bias.</p>	<ul style="list-style-type: none"> <li>• Two of our three core values.</li> <li>• Respect is also one of our One Team Behaviours. Our Respect programme encourages constructive and proactive challenge around inappropriate behaviours and within the One Team Behaviours of Honesty we also refer to challenging inappropriate behavior.</li> <li>• Our commitment to equality and diversity also references treating everyone with dignity and respect.</li> <li>• Code of Conduct states that everyone will treat colleagues and the public with dignity and respect.</li> <li>• Respect programme seeks to re-enforce this cultural approach.</li> <li>• Our people excellence statements show our clear intent to develop our staff and encourage them all to reach full potential.</li> <li>• We have focused on improving understanding around unconscious bias and on removing barriers within our recruitment and assessment processes over at least the last four years.</li> <li>• Personal and Leadership Development Framework references establishing a culture that promotes health and wellbeing, equality and inclusion and on acknowledging how others are different and bringing out the best in people (both in the Outstanding Leadership section). Also focusing on supporting own and others' development (personal attributes and facilitating improvement).</li> </ul>
<p><b>Leadership:</b> we will be positive role models, always demonstrating flexible and resilient leadership. We are all accountable for our behaviour, decisions and actions and challenge all behaviour that</p>	<ul style="list-style-type: none"> <li>• Significant focus on learning and development over past four years demonstrates our commitment to quality leadership at all levels within the Service, including the launch of our refreshed Personal and Leadership Development Framework in 2020.</li> <li>• One Team Behaviours encourage accountability and set out an expectation that</li> </ul>

<p>falls short of the highest standards.</p>	<p>everyone will challenge inappropriate behaviours – demonstration of the One Team Behaviours is also built in to the Personal and Leadership Development Framework.</p> <ul style="list-style-type: none"> <li>• We have a focus on continuous improvement (One Team Behaviours Results refers to trying to improve things, operational excellence statements state that we have a learning culture looking to continually improve what we do and how we do it and value for money excellence statements state that we continuously monitor how we are performing, sharing what we do and taking best practice from others, Personal and Leadership Development Framework also references opportunities to improve the Service under Facilitating Improvement).</li> <li>• Accountability is one of the key principles of the Code of Conduct and it is stated that all employees must be accountable to the Fire Authority for their actions.</li> </ul>
<p><b>Equality, Diversity and Inclusion (EDI):</b> we continually recognise and promote the value of EDI, both within fire and rescue services 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.</p>	<ul style="list-style-type: none"> <li>• We have an explicit commitment to equality and diversity and a focus on developing our culture to be truly inclusive (set out in the IRMP People section and our Respect programme).</li> <li>• Community excellence statements say that we are inclusive in our approach and tailor our services to meet the needs of our diverse communities.</li> <li>• Our people excellence statements commit to developing our staff and encourage them to reach their potential.</li> <li>• Respect of others is a key principle of the Code of Conduct, which also states that all employees must treat colleagues and the public with dignity and respect.</li> <li>• One Team Behaviours state that we genuinely listen to others (Trust) and that we value all people equally (Respect).</li> <li>• We are actively working to improve the diversity of our workforce.</li> <li>• Personal and Leadership Development Framework references establishing a culture that promotes health and wellbeing, equality and inclusion and engaging with others to allow them to have a voice (Outstanding Leadership).</li> </ul>