



HUMBERSIDE FIRE AND RESCUE SERVICE

# Service Improvement

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## Consultation and Engagement Policy

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<b>Responsible Person</b>	<b>Head of Corporate Assurance</b>
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What we must  
do well



How we support our  
communities



We value and support  
the people we employ



We efficiently manage  
the Service

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## **1. INTRODUCTION**

This policy sets out considerations and key areas for all employees, agency staff and volunteers working on behalf of Humberside Fire and Rescue Service (HFRS) in preparing and delivering internal and external consultations.

For the purposes of this policy the subject that is to be consulted will be referred to as a 'case'.

### **Core Code of Ethics**

HFRS has adopted the Core Code of Ethics for Fire and Rescue Services. The Service is committed to the ethical principles of the Code and strives to apply them in all we do, therefore, those principles are reflected in this Policy.

### **National Guidance**

Any National Guidance which has been adopted by HFRS, will be reflected in this Policy.

## **2. EQUALITY AND INCLUSION**

HFRS has a legal responsibility under the Equality Act 2010, and a commitment, to ensure it does not discriminate either directly or indirectly in any of its functions and services nor in its treatment of staff, in relation to race, sex, disability, sexual orientation, age, pregnancy and maternity, religion and belief, gender reassignment or marriage and civil partnership. It also has a duty to make reasonable adjustments for disabled applicants, employees, and service users.

## **3. AIM AND OBJECTIVES**

- To make staff aware of what is consultation.
- To provide guidance on planning, conducting and analysing a consultation.
- To make staff aware of contacting the Corporate Communications and Events team at the planning stages to support internal and external communications.
- To make staff aware of the best practises on consultation

## **4. ASSOCIATED DOCUMENTS**

- [Equality Impact Analysis](#)
- Legal References
  - The Consultation Charter (The Consultation Institute)
  - Government Consultation Principles 2018
  - The Gunning Principles
  - Data Protection Act 2018 Data Protection
  - Privacy and Electronic Communications Regulations 2019
  - Civil Contingencies Act 2004
  - Communications Act 2003

- Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018
- National Guidance Reference  
There is no specific National Guidance relevant to this policy.
- [Policy Delivery Guidance](#)

## 5. WHAT IS CONSULTATION

The Consultation Institute, which promotes high standards in public, stakeholder, and employee consultation, defines consultation as:

*“The **dynamic** process of **dialogue** between individuals or groups, based upon a **genuine** exchange of views with the objective of **influencing** decisions, policies or programmes of action.”*

The definition below broadly summarises all the important aspects of good practice in consultation.

**Dialogue:** Consultation is not market research or data gathering. It is a two-way process that involves an exchange of ideas.

**Dynamic:** Consultation should not be a static exercise; instead, the consultation process should evolve as issues are identified. Information should continue to be exchanged by all interested parties throughout the consultation process, so that the outcome reflects the work which has been put in during the consultation.

**Genuine:** It is essential that a consultation is open, honest, and transparent.

**Influencing decisions:** It is equally important that consultees can exert influence on decision makers and are aware of the impact their contribution can have on the decision-making process.

Source: The Consultation Institute (TCI)

**This policy is not intended to create a commitment to consult in every case. Some cases can be dealt with informally and do not always need to be part of a formal consultation. The decision taken by Humberside Fire & Rescue Service (HFRS) to consult will depend on the circumstances in each case, therefore before making the decision to begin a consultation, it is important to determine if it is necessary.**

## 6. PLANNING A CONSULTATION

Planning is an important stage of the process. Further guidance can be found in our PDG on why and how to consult, planning, stakeholder mapping and how long to consult,

**If you are consulting about a case that involves potential jobs losses, you must seek guidance from the People and Development Directorate.**

## **7. CONDUCTING A CONSULTATION**

You must notify the Corporate Communications and Events team in the early stages of planning the intention to consult, to allow time to advise on any other internal and external communications, and to plan communications as appropriate.

Further guidance can be found in our PDG on preparing a survey, monitoring responses and methods of communication.

## **8. ANALYSING A CONSULTATION**

Good consultation is about consulting on cases where participants have a real opportunity to influence decisions. Consultation only has value if the results are analysed and used appropriately to inform the decision-making process.

Further guidance can be found in our PDG on impartiality when reviewing response and evaluation.

It's considered best practise to communicate to stakeholders a summary of responses and subsequent actions based on the responses.

**For further support, please contact the Corporate Communication and Events Team.**

## APPENDIX A

### BEST PRACTICE PRINCIPLES

For consultation to yield its true benefits and to assist in the process of evidence-based decision making, it needs to consider the seven Best Practice Principles from The Consultation Charter.

#### Principle 1: The INTEGRITY of Consultation

The process must have an honest intention. The *Consultor* must be willing to listen to the views advanced by consultees and be prepared to be influenced when making subsequent decisions.

#### Principle 2: The VISIBILITY of Consultation

All those who have a justifiable right to participate in a consultation should reasonably be made aware of the exercise.

Visibility is also important for decision makers who should have full awareness of any consultation exercise which is relevant to decisions they are about to take.

#### Principle 3: The ACCESSIBILITY of Consultation

Consultees must be able to have reasonable access to the exercise. This means that the methods chosen must be appropriate for the intended audience, and that effective means are used to cater for the special needs of hard-to-reach groups and others with special requirements.

New technology offers an ever-wider choice of consultation mechanism, but consultors must always ensure that the Digital Divide does not disenfranchise citizens or stakeholders.

#### Principle 4: The TRANSPARENCY of Consultation

Many consultations are highly public, and rightly so. Indeed the principle of Transparency and the Freedom of Information Act 2000, requires that stakeholder's invitation lists, consultee responses and consultation results be published. But this should only occur with express or implied consent of participants. **Consultors who intend to publish details of respondents and their responses have a duty to ensure that this is understood by all participants.**

Consultation submissions will be publicised unless specific exemptions apply. Freedom of Information Act requests can now be used to disclose data previously kept hidden.

#### Principle 5: The DISCLOSURE Obligations in Consultation

For consultation to succeed, and to encourage a measure of trust between parties, it is important to provide for reasonable disclosure of relevant information.

*Consultors* are under a duty to disclose information which could materially influence the nature and extent of *consultees'* responses. In particular, areas where decisions have effectively been taken already, and where *consultee* views cannot influence the situation, should be disclosed.

Consultees are also under duty to disclose certain information. If a representative body expresses a view on behalf of its members, it should inform the consultor of the presence of any significant minority opinion within its membership and be prepared to estimate the extent to which it is help.

### **Principle 6: The FAIR INTERPRETATION of Consultation**

Information and viewpoints gathered through consultation exercises have to be collated and assessed, and this task must be undertaken objectively.

Only in exceptional circumstances should the decision makers themselves be involved with primary assessment of the data, and the use of external assessors has many advantages.

Where consultors use weighting methods to assist in the assessment process, this must be disclosed to participants and to decision makers relying on the consultation output.

### **Principle 7: The PUBLICATION of Consultation**

Participants in a consultation exercise have a proper expectation that they will see both the output and the outcome of the process. Except in certain closed or internal consultations, the assumption should be that publication in a form accessible to the consultee will follow within a reasonable time after the conclusion of the exercise.

Where no publication is intended, it is the duty of the consultor to disclose this when initially inviting stakeholders or the public to participate.

(Source: The Consultation Charter – The Consultation Institute)

## APPENDIX B

### THE GUNNING PRINCIPLES

Consultations must adhere to The Gunning Principles

1. When proposals are still at a **formative** stage
2. Sufficient information to **intelligent conversations**
3. **Adequate time** for consideration and response
4. Must be **conscientiously** taken into account



## **APPENDIX C**

### **GOVERNMENT CONSULTATION PRINCIPLES 2018**

#### **Consultations should be clear and concise**

Use plain English and avoid acronyms. Be clear what questions you are asking and limit the number of questions to those that are necessary. Make them easy to understand and easy to answer. Avoid lengthy documents when possible and consider merging those on related topics.

#### **Consultations should have a purpose**

Do not consult for the sake of it. Ask departmental lawyers whether you have a legal duty to consult. Take consultation responses into account when taking policy forward. Consult about policies or implementation plans when the development of the policies or plans is at a formative stage. Do not ask questions about issues on which you already have a final view.

#### **Consultations should be informative**

Give enough information to ensure that those consulted understand the issues and can give informed responses. Include validated assessments of the costs and benefits of the options being considered when possible; this might be required where proposals have an impact on business or the voluntary sector.

#### **Consultations are only part of a process of engagement**

Consider whether informal iterative consultation is appropriate, using new digital tools and open, collaborative approaches. Consultation is not just about formal documents and responses; it is an on-going process.

#### **Consultations should last for a proportionate amount of time**

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.

#### **Consultations should be targeted**

Consider the full range of people, business and voluntary bodies affected by the policy, and whether representative groups exist. Consider targeting specific groups if appropriate. Ensure they are aware of the consultation and can access it. Consider how to tailor consultation to the needs and preferences of particular groups, such as older people, younger people or people with disabilities that may not respond to traditional consultation methods.

**Consultations should take account of the groups being consulted**

Consult stakeholders in a way that suits them. Charities may need more time to respond than businesses, for example. When the consultation spans all or part of a holiday period, consider how this may affect consultation and take appropriate mitigating action.

**Consultations should be agreed before publication**

Seek collective agreement before publishing a written consultation, particularly when consulting on new policy proposals. Consultations should be published on gov.uk.

**Consultation should facilitate scrutiny**

Publish any response on the same page on gov.uk as the original consultation, and ensure it is clear when the government has responded to the consultation. Explain the responses that have been received from consultees and how these have informed the policy. State how many responses have been received.

**Government responses to consultations should be published in a timely fashion**

Publish responses within 12 weeks of the consultation or provide an explanation why this is not possible. Where consultation concerns a statutory instrument publish responses before or at the same time as the instrument is laid, except in exceptional circumstances. Allow appropriate time between closing the consultation and implementing policy or legislation.

**Consultation exercises should not generally be launched during local or national election periods.**

If exceptional circumstances make a consultation absolutely essential (for example, for safeguarding public health), departments should seek advice from the Propriety and Ethics team in the Cabinet Office.

(Source: Cabinet Office)

**If you require any further information regarding this policy, please contact the Corporate Communication and Events team.**