



HUMBERSIDE FIRE AND RESCUE SERVICE

Corporate Communication

Consultation & Engagement

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1. INTRODUCTION

This policy sets out considerations and guidance to assist HFRS in preparing and delivering a public/staff consultation.

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 of 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 final 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.

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2. CONSULTATION AND ENGAGEMENT FRAMEWORK

When planning and preparing a consultation, there are number of considerations you should consider:

- **Planning a consultation**
- **Conducting a consultation**
- **Analysing a consultation**

3. PLANNING A CONSULTATION

Planning the strategy for a consultation is an important stage of the process. Getting things right in the planning stage will greatly improve your chances of a meaningful consultation.

(When referring to stakeholders – A stakeholder is someone who has an interest in or will be impacted or affected by a proposed change. This includes the whole range of people from staff, impacted individuals, community groups, partner agencies or voluntary organisations, etc.)

Why are you choosing to consult?

Before you start the process, be clear from the outset why you are conducting a consultation and what your objective is. Depending on the significance of the case, it may be more appropriate to involve and engage stakeholders informally instead of launching a consultation. Alternatively, you may need to involve and engage informally prior to a formal consultation to gain an understanding of the issues that will need to be raised or developed within the formal consultation.

Consultation should only take place when there is scope to influence decisions, policies or programmes of action. It should never be conducted as a tick box exercise or when a decision has already been reached prior to a consultation taking place. This is considered as predetermination.

Has a similar consultation been done before?

Asking the same group of people the same questions again and again will result in 'consultation fatigue'. This makes it difficult to get people to take part in the process, meaning your responses could be minimal. If it is an external consultation, check to see if partner agencies or Local Authorities have conducted similar consultation recently, or better still, try to work with them to conduct a joint consultation, if it's appropriate. If the consultation is internally focused, consider staggering when they are launched, or where possible, combine into a single consultation.

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Make a plan

Once you have taken the decision to conduct a consultation, it is important to establish who will be involved in the planning and implementation process, if it is a low level consultation, it may only require one person to facilitate the process. For more significant cases, however, it is recommended to meet with the relevant people who will be involved to establish an action and delivery plan. This will help everyone involved understand the time-scales and who is responsible for which actions. To ensure the consultation is effective, the group should meet regularly throughout the planning and implementation process.

Getting things right in the planning stage will greatly improve chances of a meaningful consultation.

Stakeholder mapping

This is one of the most important parts of the planning process. One of the hardest things to do is to try and consult with 'everyone'. Having a target approached to the stakeholders you consult with means you are more likely to get meaningful feedback. The stakeholders you approach should be a mixture of those who have in *interest* and those who can *influence* the case you are consulting on. In most cases, you will need the support of other teams within the organisation to build the appropriate stakeholder database.

Use our partners where possible – it's worth noting, many of our partners may already have existing databases of the stakeholders you are trying to target. Make some enquiries with Local Authorities or other agencies before you start. It could save you valuable time!

Plan your consultation

For a consultation to be appropriate, it must have purpose and be undertaken at a time when proposals are still in a formative stage. It must include sufficient reasons for particular proposals to allow those consulted to give intelligent consideration and intelligent response.

It is not best practice to consult on only one option as this is deemed to be a predetermined consultation. If a consultation is around significant changes, it is recommended to deliver a robust engagement activity plan, with appropriate stakeholders, ahead of the consultation process. This approach enables the consultees to be involved in the development stage of proposal(s) and gives them an opportunity to influence the proposals that will form the consultation.

Consultation documents should be clear, concise and jargon free. Keeping the burden of consultations to a minimum is essential to get participants to buy into the process. Most importantly, consultation documents should be engaging. Remember,

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you are asking people to give their time to take part, the more engaging you make a consultation, the more responses you are likely to receive. Also, be mindful of the length of any documents by keeping it as short as possible. If the document is too lengthy, it is likely people won't bother to read it.

Think about using graphics, photos or illustrations to present the information in a more visual way. Video is a very powerful and engaging way of concisely explaining what you are consulting on. A combination of methods to offer a *short* and *long* version is the best approach, however, you will always need a detailed consultation document should it be requested.

It is very important to think about the stakeholders you are approaching and produce a document that is appropriate. For example, if you are consulting with the 18 – 30 age range, the style would not be the same as if you were consulting with 50+ age range.

You must also consider if the consultation is accessible to all stakeholders, are there any groups you are consulting with who may need reasonable adjustments made? You may need to provide braille versions or be requested to translate it into another language.

You must provide sufficient information for participants to make an informed choice and make clear the level of influence participants will have.

The consultation document/video etc. is only one element of the consultation process, time must be given to preparing the consultation questions. Questions should be clear and enable scope for participants to give meaningful feedback. In most cases, an electronic survey will be sufficient, however, paper copies should always be available by request.

There are many other ways you can engage with stakeholders, consider:

- Host workshops
- Public/community meeting
- Host drop in sessions
- Focus groups/discussion forum

Consider how you are going to publicise the consultation. This will vary depending on the audience. You may need to use the local media to generate interest, if this is the case build this into your plan.

It's important to establish your budget to help you plan your consultation activity.

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Decide how long to consult for

There is no single approach that applies to all consultations. The length of the consultation should be determined by the significance of the case and the impact the changes may have. For example, if you are consulting with a small group of people on a case that has a low impact, four weeks may be appropriate. You should also consider if a consultation is appropriate; could this be done through involving and engaging with stakeholders instead? If, however, you are consulting on a case that will have a significant impact on a large number of people, 12 weeks is appropriate.

You must ensure participants have enough time to respond. You should consider the stakeholders you are contacting i.e. many community groups etc. break for summer, so consider allowing more time. If you consult over the Christmas period, it is also recommended that you build in extra time. Be clear in all consultation material about the closing date for responses.

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

4. CONDUCTING A CONSULTATION

Survey

Ensure your survey is easy to use – always test it first!

Your questions must be structured in a clear and concise manner. Be careful not to ask leading questions, remember to stay impartial. Where possible, try to mix up the style of questions, i.e. multiple choice, free text etc. The important thing is to ensure the survey allows participants to give meaningful feedback freely.

If you wish to offer feedback directly to consultees you can ask for personal details such as name and address etc. This should be optional, however, as people must be allowed to feedback anonymously if they wish. Consider having an option for people to provide their email address if they wish to be contacted regarding the outcome of consultation.

Depending on the case, you may ask people to indicate which area they are from or you may ask people to indicate if they are from a community group. This can help you when analysing the results.

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Website

Excluding internal consultation, consultations should to be published on the HFRS website to support transparency. Wherever possible, it should appear on the home page with links to the consultation document and all supporting documents.

For internal consultations, all the information should be hosted on the home page of the portal.

Social Media

Not including internal consultations, social media platforms should always be built into your consultation plan. Social media is a powerful tool, its free, instant and, if used in the right way, can get your message out to significant numbers of people. You should regularly send out messages during the consultation period, keep it engaging and change the messages to keep momentum and generate interest.

Publicity

Consider how are you are going to publicise the consultation. This will vary depending on the audience. You may need to use the local media to generate interest. It may be that you ask partner agencies to promote it through any appropriate channels they have. If you need to generate large public interest, consider arranged media interviews (TV/radio) with the appropriate spokesperson.

Think outside the box, are there any free advertising opportunities such as agency news letters or community social media forums you could utilise? If the consultation is significant, you may need to secure a budget to carry out paid advertising. Whichever approach you take, it is important to keep promoting the consultation through the active period.

Monitor responses

If it is a significant case, it may be necessary to monitor the responses as the consultation is active. If you anticipate a large number of responses this could reduce the volume of work at the end of the process.

Communication

During the consultation, it is important to ensure those involved in the delivery process are kept up to date of the progress. Regular meetings also ensure the consultation plan is being delivered and everyone is clear about what is happening and when.

It is also important to continually promote the consultation throughout the process to ensure every effort has been made to make people aware it is happening.

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5. 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. You must carefully analyse the data, analysing consultation responses is primarily a qualitative rather than a quantitative exercise.

Where possible, it is advisable to group responses together. Depending on the case, you may group responses from representative bodies and responses from staff or people who live in one geographical area versus another.

If there is a significant number of responses, it may be necessary to pull out emerging themes from the responses, this would be done for the purpose of the consultation feedback report.

Remember – you must stay impartial when collating the responses.

Consultation should not be the end of the process. The results are meaningless if they are not communicated to the people who contributed to them. Whilst not everyone will not agree with the findings or the outcome, the opportunity should be taken to inform those who have taken part of how their input has affected the decision making process.

Consideration should be given to publishing all of the individual responses received. If this decision is taken all personal details should be removed to comply with data protection. You must never amend individual responses, even if they include spelling or grammatical errors.

A summary of themes from the responses, along with clear feedback should be provided in a timely fashion to participants following the consultation.

Evaluate

It is vital to evaluate the consultation process and consider how it could be improved upon. An evaluation should also seek to identify 'good practice' which can be used to inform future consultation.

For further support, please contact the Corporate Assurance team.

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6. 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.

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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 or 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 – tCI)

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7. 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

8. 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 take 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 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 Assurance team.

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