



HUMBERSIDE FIRE AND RESCUE SERVICE

Service Improvement

Corporate Communication and Social Media Policy

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1. INTRODUCTION

This policy provides all staff, including agency staff, and volunteers working on behalf of Humberside Fire and Rescue Service (all thereafter referred to within the term 'staff'), on the acceptable use of photography and filming, use of social media and legal requirements of using and keeping media/press content, such as newspaper clippings.

For the purposes of this policy, 'Corporate Communication' refers to managing and coordinating internal and external communications.

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, DIVERSITY 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 or in its treatment of employees, 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 outline the acceptable use of photography and filming.
- To set expectations and boundaries for using corporate social media channels.
- To inform employees about legal restrictions on social media use.
- To provide the rules for the clipping, editing, and sharing of media content.

4. ASSOCIATED DOCUMENTS

- [Equality Impact Assessment](#)
- Legal References
 - Data Protection Act 2018
 - Data Protection, Privacy and Electronic Communications Regulations 2019
 - Copyright, Designs and Patent Act 1988
 - Civil Contingencies Act 2004

- Communications Act 2003
- Malicious Communications Act 1988
- Defamation Act 2013
- Protection from Harassment Act 1997
- Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018
- Online Safety Act 2023
- National Security and Investment Act 2021
- Data Protection and Digital Information Bill (2023 revision)
- [Fire Standards: Communication and Engagement](#)
- [Data Protection Policy](#)
- [Internet, Email and Instant Messaging Policy](#)
- [Dignity at Work Policy \(anti Bullying and Harassment Procedure\)](#)
- [Control of Contractors and Visitors Policy Delivery Guidance](#)
- [Consultation and Engagement Policy](#)
- [Consent Form](#)
- National Guidance
National Operational Guidance - Warn, inform and advise people

5. COMMUNICATION ROLES

The Corporate Communication team is part of Corporate Assurance and manages the following areas: internal and external communications, corporate campaigns, Prevention and Protection communication and campaigns, promotion of National Fire Chief's Council (NFCC) campaigns, branding guidelines, consultations, social media and website monitoring and editing, and media enquiries.

6. ACCEPTABLE USE OF PHOTOGRAPHY AND FILMING

Consent must be given by members of the public to be included in any photography and filming for Humberside Fire and Rescue Service's own use, both internally and externally, by completing a [consent form](#). If an employee's image is captured while they are in uniform and performing their role, written consent is not required. Employees should notify the Corporate Communication team if they do not wish their image to be used.

Further guidance on the acceptable use of photography and filming and storing them is provided in the [Acceptable Use of Photography and Filming Guidance Note](#).

Storage of Photography and Filming

Completed consent forms and photos and videos (such as those captured by employees at incidents), should be managed in line with the Service Retention Schedule outlined in the Data Protection Policy.

7. ACCEPTABLE USE OF SOCIAL MEDIA

HFRS uses social media responsibly and professionally to share campaigns, incidents and general news in a consistent and coordinated way. The Corporate Communication team manages all official HFRS social media accounts, Guidance on the management of these profiles and content is provided in the [Social Media Guidance Note](#).

The Corporate Communication team understands that employees may look on social media to find information about multi-agency incidents. While this can be beneficial, employees must make sure they look at reputable sources such as local or national news outlets and partner agency profiles.

The team is aware of the increasing presence of Public Auditors and Social Media Bloggers at public sector and emergency service locations. Guidance on how employees should respond to such interactions is provided in the Public Auditors/Social Media Bloggers Guidance Note. Employees should also refer to [Control of Contractors and Visitors Policy Delivery Guidance](#) for arrangements for visitors at Service locations.

Personal Use of Social Media

Employees must be cautious when sharing, posting, or interacting with content on personal social media accounts or messaging platforms such as WhatsApp, Facebook Messenger and Teams. Content shared, liked, or commented on could offend others, lead to claims of harassment or discrimination, or be manipulated to create false identities or spread misinformation. Harming both personal and organisational reputations. Corporate Communication team advises that employees should verify profiles before engaging and think carefully about the impact of their online activity.

Phrases like 'sharing does not necessarily mean endorsement' provide little protection for employees from HFRS's perspective. Similarly, 'opinions are my own' does not mitigate potential offence or damage to the organisation's reputation. Employees should also be aware that their posts or social media activities may be reported to the platform for investigation by other users.

Instant messaging channels and platforms, such as WhatsApp and Facebook, are designed to be easy to use and employees may find themselves in breach of policies without realising the impact of their behaviour. Guidance on what the Service expects from employees in the online environment is in the [Social Media Guidance Note](#). Guidance on inappropriate or discriminatory behaviour is available in the [Professional Standards Dignity at Work Policy \(anti-Bullying and Harassment Procedure\)](#).

Further guidance on using real-time messaging platforms, such as WhatsApp, Facebook Messenger and Teams, is available in the [Internet, Email and Instant Messaging Policy](#).

Data protection rules and obligations of confidentiality do not disappear when using systems and platforms like WhatsApp and Facebook. Chats on instant messaging

systems may also be subject to Freedom of Information legislation and Subject Access Requests.

Employees whose use of social media is in contravention of this policy may be subject to HFRS's Disciplinary procedure.

Who Can Post Social Media Content on Behalf of HFRS?

The Corporate Communication team controls access to HFRS' social media accounts and can grant or revoke it as needed. Along with the Strategic Leadership Team (SLT) and the Corporate Leadership Group (CLG), they can also request a pause or restriction on posting if required.

HFRS has the following social media accounts:

- One corporate account on X (formally known as Twitter), which is used exclusively to provide safety information about 999 incidents.
- One corporate account on Facebook, Instagram, LinkedIn, YouTube, and TikTok, all managed by the Corporate Communication team.

On-Call fire stations have their own accounts, managed by station employees and approved by the Corporate Communication team.

No employee is allowed to create any other HFRS social media accounts without authorisation from the Corporate Communication team.

All employees must comply with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 when using social media, as it involves personal data processing. For more details, refer to the Data Protection Policy.

8. COMMUNICATION DURING PRE-ELECTION PERIOD

The pre-election period is the term used to describe the period between the time an election is announced and the date the election is held.

Humberside Fire and Rescue Service must remain neutral and cannot favour any political party or Police and Crime Commissioner (PCC) candidate. Employees should be aware of the pre-election period, which relates to the Humberside Fire Authority, made up of Councillors from local authorities in the Humber region.

Guidance on what employees can and cannot do during the pre-election period is in the [Pre-Election Guidance Note](#).

9. MEDIA ENQUIRIES

Initial media enquiries are handled by Fire Service Control Room, which operates 24/7. Requests for interviews or further information will be passed to the Corporate Communication team during office hours (Monday to Friday, 8am to 5pm). Guidance to

make sure responses are handled legally and confidentially is in the [Media Enquiries Guidance Note](#).

10. MEDIA CUTTINGS AND CLIPPINGS

To protect HFRS from an infringement of copyright, no employee can copy and/or store any physical cuttings or digital clippings from newspapers and magazines in their place of work and/or store on their HFRS computer, mobile device or in filing systems, such as a folder, scrapbook or album.

What Is Classed As Copying?

Copying includes:

- Photocopying, scanning, and emailing news or magazine articles
- Sharing news or magazine articles with colleagues or external contacts
- Hosting news or magazine articles on shared drives, cloud-based storage, intranet, or public websites and social media accounts
- Printing out or emailing articles received from external sources, such as PR or media monitoring agencies, including in some cases Google Alerts (depending on the publisher)
- Copying and pasting headlines and content into emails or documents, which would be an infringement of copyright.

Sharing a weblink of news coverage is acceptable.

11. ACCESSIBILITY

Making communication accessible benefits everyone and this includes the HFRS website, in compliance with the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018. Upon request, we can provide information in the following formats:

- Large Print for individuals with visual impairments
- Audio formats, such as downloadable MP3 files
- Braille for those who read tactile formats
- Translations into other languages, including British Sign Language (BSL) where applicable

12. PROMOTION REQUESTS

HFRS is unable to communicate any advertising materials or business requests, including those from businesses owned by HFRS employees, both internally and externally.

HFRS supports The Fire Fighters Charity and My Burns Club and will also recognise and support employees involved in other charity events and fundraisers.

13. RESPONDING TO FORMAL CONSULTATIONS OR PUBLISHING/SUBMITTING

ARTICLES FOR [ACADEMIA/EVIDENCE GATHERING PURPOSES](#)

HFRS recognises that employees may wish to make submissions or publish articles for academia purposes, whether this be in a professional or personal capacity. Anything submitted in a professional capacity is classed as the property of HFRS, who will own the rights to such material. Employees must be cautious when responding to formal consultations or inquiries, especially if the response may be published publicly, such as online via a website or on social media.

Employees should follow the approval process in the [Consultation and Engagement Policy](#) before proceeding with any of the above.

If you require any further guidance/information about this document, please contact the Corporate Communication team.

APPENDIX A: GUIDANCE NOTE: ACCEPTABLE USE OF PHOTOGRAPHY AND FILMING

INTRODUCTION

This Guidance Note highlights the responsibilities of all employees on the acceptable use of photography and filming while working for Humberside Fire and Rescue Service (HFRS).

INTERNAL USE

In the context of this Guidance Note and Corporate Communication and Social Media Policy, the term 'internal' is defined by activities, events and content that are for employees and will be shared within the organisation.

If we take photos or videos of anyone, such as members of the public or employees, we must get their consent before using the images in any publications (see External Use).

However, for employees in uniform performing their duties, written consent is not required. Employees should inform the Corporate Communications team if they do not want their image to be used.

EXTERNAL USE

In the context of this Guidance Note and Corporate Communication and Social Media Policy, the term 'external' is defined by activities, events and content that are from both HFRS and non HFRS locations and are to be published for anyone, employees or public to see.

Employees attend public based events and activities. If employees take photographs and film, they must:

- Use a Service issued device (mobile phone, camera) to capture photos and film.
- Check with the event organiser and / or responsible person before attending to clarify and gain permission to take photographs and videos.
- Those recorded must be made aware of how, where and for what purpose their image may be used.
- Consent must be obtained before taking photos or filming groups and individual members of the public, by verbally asking members of the public and asking them to complete a consent form.
- Signs must be visible stating that filming and photography is being carried out during an HFRS event which is open to members of the public.

AT INCIDENTS

Employees who are instructed by the Officer in Charge or as part of their role as Investigating Officer to capture photographs and film at an incident, must:

- Wherever possible, not capture images of individuals.
- Make sure that images of members of the public should only be captured where there is good reason and a lawful basis, for example being interviewed by a Fire Investigation Officer. (Images of employees in uniform, doing their job is acceptable.)
- Make Sure that images which are intended to be used externally must have any associated information which may be aggregated to assist in the identification of an individual removed or masked. Such information includes street names, house numbers and names, vehicle registration numbers or other location information (northings and eastings, map references, coordinates).

USE OF THIRD-PARTY MATERIAL

Third party materials mean any materials and information, including documents, data, know-how, ideas, methodologies, specifications, software, content, and technology, in any form or media, in which any person or company other than HFRS owns any Intellectual Property Right and has not been created and labelled to use freely.

Employees must be cautious when searching for materials to use internally and externally and must make sure they are categorised as ‘free to use’ and have no copyright. Failure to do this may result in HFRS and the employee being liable to pay fees for their use, even after they have been removed.

Some third-party materials may be free to use if the creator is credited in the document/publication.

More information about copyright can be found on the GOV.UK website [here](#).

STORAGE

Retention of photographs and film should be in accordance with the Service Retention Schedule as outlined in the Data Protection Policy.

The length of time retention will vary dependent on the reason for having them and justification for keeping them. Once the reason for having them has gone, they should be disposed of.

Retention of images captured at incidents will be based on purpose and how they were captured. The Surveillance Camera Policy deals with the use of various CCTV cameras which HFRS operates, on buildings, fire service vehicles, drones and body-worn cameras. For all of these, except where the images need to be retained for training purposes, incident de-briefs, investigations and prosecutions, the retention period is 30 days.

APPENDIX B: GUIDANCE NOTE: SOCIAL MEDIA

INTRODUCTION

This Guidance Note highlights the responsibilities of all employees on the acceptable use of social media in a personal and corporate capacity whilst working for Humberside Fire and Rescue Service (HFRS).

CORPORATE USE OF SOCIAL MEDIA

Employees should contact the Corporate Communication team to request access to corporate social media accounts.

Employees who have been given access to corporate social media accounts must receive social media training from the Corporate Communication team before using and positively portray HFRS in all social media posts.

No other HFRS social media accounts should be created by any member of employees without authorisation from the Corporate Communication team.

When creating social media posts about events or incidents, it is essential to remove any potentially sensitive or confidential information. This includes company names, house numbers, license plates, and the names or faces of casualties. Avoid using Fire Service acronyms or terms like 'appliance'; instead, use plain language such as 'fire engine'.

The Corporate Communication team controls access to HFRS' social media accounts and can grant or revoke it as needed. Along with the Strategic Leadership Team (SLT) and the Corporate Leadership Group (CLG), they can also request a pause or restriction on posting if required.

PERSONAL USE OF SOCIAL MEDIA

Employees and those working on behalf of HFRS must:

- Not engage in activities on the internet which might bring the organisation into disrepute or damage HFRS's reputation.
- Not breach any other HFRS policy (such as IT usage, staff code of conduct, Dignity at Work etc.).
- Not breach copyright or confidentiality clauses.
- Never use social media to intimidate, bully or in any way attack or abuse colleagues or members of the community.
- Not post derogatory or offensive comments on the internet.
- Not contradict the corporate message or stance on issues relating to the business of HFRS, for example safety messages, financial decisions or positive action for example.
- Not post sensitive or potentially sensitive information relating to HFRS. This includes posting photographs or video footage taken at an incident, information about an operational response or any other information you may be exposed to within your employment.
- Act in a transparent manner.

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Information on social media may remain accessible for a significant period after it is posted, even if the original content has been removed. Inappropriate or discriminatory posts can result in claims of unlawful harassment, discrimination, or bullying.

Further guidance is available on the use of real-time instant messaging platforms such as WhatsApp, Facebook Messenger, Teams, and other channels that facilitate virtual and social interactions. [Internet, Email and Instant Messaging Policy](#).

APPENDIX C: GUIDANCE NOTE: MEDIA ENQUIRIES**INTRODUCTION**

This Guidance Note highlights the responsibilities of all employees to make sure media responses on behalf of Humberside Fire and Rescue Service (HFRS) are handled legally and confidentially.

INCIDENTS TAGGED AS ‘CONFIDENTIAL’

These will not appear on the incident feed on HFRS’ website, however, should enquiries be received for such incidents, the response must be “we attended an incident” and give the time, location and number of operational vehicles **ONLY**.

INFORMATION TO BE GIVEN TO THE MEDIA

- The supposed cause provided it has been identified beyond reasonable doubt (other than fatalities or possible fatalities).
- Time of call.
- Number and type of fire engines and vehicles attending.
- Methods used for any rescues.
- Measures taken to bring the incident under control or prevent the situation worsening.
- The time the incident was brought under control.
- Extent of damage in general terms only. No estimate of financial loss should be given. It is of course more important to say what has been saved.
- Avoid using fire service acronyms and terms that members of the public may not understand. Information given must be easily understood by all.

INFORMATION NOT TO BE GIVEN TO THE MEDIA

Under no circumstances should information concerning the following be given without permission from the Duty Principal Officer:

- Full address.
- The supposed cause of fire where it is not identified beyond reasonable doubt or where fatalities have occurred or may occur.
- Failure of water supplies or other services or delays in response.
- Where HFRS receives interference or criticism from the public, officials or organisations, or from any other source.
- Any matter which may be the subject of subsequent enquiry or litigation.
- Names of any civilian or Fire Service casualties.
- Any characteristics that could identify an individual, such as their name, face, gender, physical appearance, or specific circumstances of assistance (e.g., bariatric support). Use neutral, respectful language that focuses on the incident, not the individuals involved.
- Criticism of actions by occupiers/owners of property, or of design in construction of any particular property, or of processes carried out in connection with the property.

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- Any information concerning the location, size or nature of any explosive device.
- Details of suspected suicide attempt or helping an agency in the recovery of body.
- Details of a person(s) who have died at the incident because of a fire or otherwise. Information of this kind will be dealt with by the Police.

APPENDIX D: GUIDANCE NOTE: PRE-ELECTION GUIDANCE NOTE

INTRODUCTION

This Guidance Note highlights the considerations and responsibilities of all employees during a pre-election period.

WHAT IS THE PRE-ELECTION PERIOD?

The pre-election period is the term used to describe the period between the time an election is announced and the date the election is held. Civil servants are given official guidance by the Cabinet Office on the rules they must follow in relation to Government business during this time.

IS THIS DIFFERENT TO 'HEIGHTENED SENSITIVITY'?

No, this term has been used more recently to describe the pre-election period and should be treated the same way.

WHY IS IT NO LONGER KNOWN AS PURDAH?

It is an outdated term that has been replaced by 'pre-election period', this is due to the origins of the term (purdah) relating to female oppression in some Muslim and Hindu communities.

HOW DOES IT EFFECT Humberside Fire and Rescue Service (HFRS)?

All employees must be aware of the pre-election period in relation to our Fire Authority, which is made up of Councillors and as well as locally held PCC elections. We must be mindful that inviting them to any events during this period could be seen to be influencing their outcome in the election.

Managers need to be aware that they and their teams may be approached by those ahead of local elections to visit our locations or events, which could be used for a photo opportunity.

HFRS cannot favour a political party or PCC candidate and therefore the previous actions could bring the organisation into disrepute.

ADVICE FROM THE LOCAL GOVERNMENT ASSOCIATION

Publicity is defined as "any communication, in whatever form, addressed to the public at large or to a section of the public."

The first question to ask is: 'could a reasonable person conclude that you were spending public money to influence the outcome of the election?' In other words, it must pass the 'is it reasonable' test. When making your decision, you should consider the following.

What you should not do:

- Produce publicity on matters which are politically controversial
- Make references to individual politicians or groups in press releases
- Arrange proactive media or events involving candidates
- Issue photographs which include candidates
- Supply photographs or other materials to councillors or political group employees unless you have verified that they will not be used for campaigning purposes
- Continue hosting third party blogs or e-communication
- Help with national political visits, as this would involve using public money to support a candidate or party. These should be organised by political parties with no cost or resource implications for the organisation.

What you need to think carefully about:

You should think carefully before you:

- Continue to run campaign material to support your own local campaigns. If the campaign is already running and is non-controversial for example, on issues like recycling or foster care and would be a waste of public money to cancel or postpone them, then continue. However, you should always think carefully if a campaign could be deemed likely to influence the outcome of the election and you should not use councillors in press releases and events in pre-election periods. In such cases you should stop or defer them. An example might be a campaign on an issue which has been subject of local political debate and/or disagreement.
- Launch any new consultations. Unless it is a statutory duty, don't start any new consultations or publish report findings from consultation exercises, which could be politically sensitive.

What you are allowed to do:

- Publish factual information to counteract misleading, controversial or extreme, for example, racist/sexist information. It is perfectly right and proper that the organisation responds if it is factual.
- Use relevant managers rather than members of the Fire Authority for reactive media releases.
- Use a Councillor who is involved in an election when the Fire Authority is required to respond in circumstances, such as in an emergency or where there is a genuine need for a member-level response to an important event beyond the organisation's control. If the issue is so serious, it is worth considering asking the Fire Authority to agree to a response which would involve all of them.
- If you are in any doubt, seek advice from the Corporate Assurance team.
- Ultimately, you must always be guided by the principle of fairness. It is crucial that any decision you take would be seen as fair and reasonably the public and those standing for office.

APPENDIX E: GUIDANCE NOTE: PUBLIC AUDITORS/SOCIAL MEDIA BLOGGERS

The purpose of this Guidance Note is to assist Humberside Fire and Rescue (HFRS) employees to conduct themselves accordingly with our Core Code of Ethics when interacting with self-proclaimed Public Auditors and Social Media Bloggers, if they arrive at Service locations such as a fire station and Service Headquarters.

Who are Public Auditors/Social Media Bloggers?

The Auditors/Bloggers are members of the public and social media users who arrive unannounced to film public locations, notably emergency services locations. They will be filming upon arrival and around the station, often using a handheld tripod and/or microphone, and claiming to be exercising their right to film and giving no further justification.

They should not be confused with hostile reconnaissance which by its nature is covert. Their aim is likes and follows on social media to be able to monetise their videos.

What will they do?

You may encounter someone filming in and around HFRS locations. They will say they are “just looking around,” and that they “film public buildings,” and they will present themselves as members of the public, but with a camera. If they are challenged, or we refuse to let them in/ask them to turn the camera off, the way this is done can itself become the main focus of their recording. We strongly recommend that you do not take this approach.

Some of them will want controversy, confrontation, defensiveness of tone or body language. They will anticipate that the stronger the reaction from you, the more interest will be generated, so they may attempt to provoke you and turn this into a success for them.

What should employees do?

We know it is natural to feel uncomfortable and unnatural being filmed, especially when the intentions are unclear. Nonetheless, be respectful and polite. Ignore the camera and converse as you would normally with a member of the public at a community event or station open day.

Be mindful of your reaction and tone and try to be professional and helpful.

If you have time: explain we are happy to welcome visitors but, with commitments such as training and visits, we can only give them a maximum of 10-15 minutes as it is not simply a matter of giving them free access. We also need to be sure they don't get hurt or delay us if we are called to an incident and the crew need to leave immediately. Showcase our vehicles and equipment in the appliance room and/or grounds to enable a quick evacuation of the building. This response will go a long way to avoiding any conflict.

If you do not have time: calmly explain that you have prior commitments and that it is not safe for people to be on station unsupervised whilst employees are working to keep the Humber region safe. You can suggest that the visit is arranged for another time, in line with the Service's [Control of Contractors and Visitors Policy](#).

What if it becomes confrontational?

If the Public Auditor/Social Media Blogger appears or becomes unwilling to co-operate or tries to enter parts of the site you don't feel is appropriate, there are ways to manage this.

Explain that there are some parts of our work and station that we need to keep private, such as employees rest areas.

If you sense the interaction is deteriorating, they are pushing too hard or that they are looking for conflict, take a slightly firmer tone and be prepared to repeat it a few times:

"It's great that you're interested in our work, but I think we've achieved all we can today, so we need you to leave now, please."

You may need to repeat this a few times which may feel awkward and unnatural, but it will not benefit their viewing figures and ultimately that's why they are visiting, so should prompt them to leave.

Offer another visit at another date and time, as long as they arrange it in advance. They are however unlikely to book in advance as the concept of auditing is to try and catch the emergency service unannounced and see how employees react.

What if we get a visit?

Please let the Corporate Communication team know, through email corporatecommunication@humbersidefire.gov.uk, phone call or via Fire Control.

Please make sure you review the [Control of Contractors and Visitors Policy Delivery Guidance](#) to ensure HFRS personnel, locations and assets are protected from unauthorised access, damage and interference.