

Fire and Rescue Framework for Scotland 2022

Consultation Analysis Report

March 2022



Scottish Government
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Introduction

This report provides a summary and analysis of the responses received by the Scottish Government to the consultation on the draft Fire and Rescue Framework for Scotland 2022.

The Fire and Rescue Framework for Scotland 2022 (The Framework) is a statutory document (under the Fire (Scotland) Act 2005 as amended by the Police and Fire Reform (Scotland) Act 2012). It outlines Scottish Ministers' expectations of the Scottish Fire and Rescue Service (SFRS), setting priorities and objectives and providing guidance to SFRS on the execution of its functions in terms of public safety, efficiency and effectiveness. It will replace the current [Fire and Rescue Framework for Scotland 2016](#).

The Scottish Government published a draft Fire and Rescue Framework for Scotland 2022 (The Framework) for public consultation, which ran from **29 September 2021** to **22 December 2021**. The consultation was open to the public and sought the views of those with an interest in the workings of SFRS and how it operates to keep communities safe.

The Consultation

The consultation asked for views concerning the following sections within the Framework consultation document:

- Strategic Priority 1 – Prevention and Protection
- Strategic Priority 2 – Response
- Strategic Priority 3 – Innovation and Modernisation
- Strategic Priority 4 – Climate Change
- Strategic Priority 5 – Effective Governance and Performance
- Strategic Priority 6 – People
- Strategic Priority 7 – Partnership

The questionnaire contained 9 questions:

- Questions 1-7 sought views on the 7 strategic priorities.
- Questions 8 and 9 asked whether these are the right 7 priorities to be included in the next Fire and Rescue Framework for Scotland and whether anything else should be included.

The **7 strategic priorities** which were consulted upon were as follows:

Strategic Priority 1 – Prevention and Protection

The overriding purpose of SFRS remains to improve the safety and well-being of communities. A priority for SFRS is preventing fires and reducing their human, social and economic impact. SFRS should use an evidence-based approach to target groups and individuals according to risk, and universal population wide activities, to improve fire and wider community safety. These should contribute to reducing inequality and encouraging sustainable and inclusive growth. SFRS should work

with public, private and voluntary organisations; communities and individuals where they can add value and contribute to outcomes.

Strategic Priority 2 – Response

In conjunction with effectively addressing risk, SFRS should ensure that the capability of its assets and staff, combined with technological improvements, enable it to respond to incidents with the right resources at the right time across communities in Scotland. The Service should embrace a flexible, innovative and inclusive approach to its service delivery and resilience planning, ensuring its response resources and crewing arrangements are aligned to current and future risks.

Strategic Priority 3 – Innovation and Modernisation

SFRS should continually improve and modernise the service it provides so that it can do more to improve outcomes for communities across Scotland. Modernisation proposals should be considered, developed and delivered using sound evidence and should include but not be limited to ensuring SFRS is using its people, assets and financial resources in the most efficient and effective manner and that the role of firefighters is modernised to allow the Service to address new and emerging risks in our communities.

Strategic Priority 4 – Climate Change

SFRS should continue working with other public sector partners and communities to support action to address the climate emergency including the challenges of more extreme weather events. SFRS should do so by preventing and reducing its own greenhouse gas emissions and working to ensure Scotland's communities are resilient and safe in response to the changing climate. SFRS's corporate response to the climate emergency should include, for example, commitment towards transitioning over to ultra-low emission fleets, renewable energy and heat; low carbon buildings and materials; and wherever possible, maximising the positive impact procurement can have on addressing the climate emergency.

Strategic Priority 5 – Effective Governance and Performance

SFRS should ensure it has an effective approach to performance management to support robust scrutiny of the Service at national and local levels. This approach should be regularly reviewed and evaluated in pursuit of continuous improvement. SFRS should also collect, produce and analyse data and other intelligence to inform actions to promote the safety and well-being of communities, support operational efficiency and performance improvements (including its partnership contributions) and enable effective public reporting of performance.

Strategic Priority 6 – People

SFRS should continue to be a Fair Work employer and develop as an employer of choice. It should promote the equality, safety and physical and mental health of all its staff. SFRS should continue to maximise the effectiveness of its approach to workforce and succession planning and should be a learning organisation with equal

opportunities for all. SFRS should ensure it enables innovation and change through its People Strategy. SFRS should actively strive to be an organisation that is more representative of the people and communities of Scotland that it serves.

Strategic Priority 7 – Partnership

Working with others such as other blue light emergency services, public, private and voluntary organisations and Scotland’s communities should be ingrained throughout SFRS. This includes but goes beyond the important and statutory work undertaken through the established Community Planning Partnerships. Partnerships should develop joined up policies to multidimensional problems. Innovative leadership should be provided to facilitate the identification of collaborative opportunities, making the best use of public resources. The aims should be to achieve community safety, drive out inefficiencies, where possible, whilst achieving operational efficiencies and effectiveness to ultimately improve outcomes for our Scottish communities.

The consultation was published on the Scottish Government consultation website, and was open to the public for responses from individuals and organisations. The Scottish Government contacted a wide range of stakeholder organisations to advise them of the consultation and invite responses.

Responses

The Scottish Government received **48** responses to the consultation, which were broadly supportive and constructive. We would like to express our sincere thanks to those that submitted a response to the consultation.

A full list of the respondents to the consultation who were willing to have their name/organisation disclosed is provided in Annex A. Where respondents have given permission for their response to be made public, these are available on [Citizen Space](#) which is accessible via the Scottish Government website. All respondents were given the choice to submit their entries anonymously and for their responses to be made anonymous in reporting. All responses were moderated for any potentially defamatory, explicit or offensive material before being approved for publication.

Nine different sectors responded as set out in the table below.

Type of organisation/sector	Number of responses
Fire & Rescue Organisations	2
Individuals	22
Voluntary Sector Organisations	1
Trade Unions	1
Community Planning/Safety Bodies	3
Public Bodies	3
NHS Organisations	2
Industry/Trade Associations/Bodies	3
Local Authorities/Community Councils	11
Total	48

As indicated above, the consultation was structured by 9 yes/no questions which then asked respondents to provide further comments as appropriate to explain their views.

Findings

Across the range of questions, which cover the entirety of the draft Framework text, there was widespread support for the strategic priorities and the supporting text. Questions 1 – 7 specifically asked whether or not the respondent agreed with, as well asked for comments on, the relevant sections of the document. On average 81.84% of respondents agreed with all 7 questions regarding the specific strategic priorities.

It is worth noting that some respondents who did not provide a yes/no answer to these questions provided supportive additional comments. Further exploration of all comments alongside each yes/no question where respondents did provide an answer revealed that some of the respondents who did select 'yes' or 'no' to the questions caveated their responses in the feedback which followed.

A wide range of views were expressed, some of which were in-depth explorations of aspects of operational firefighting or other more specific matters relating to aspects of fire and rescue and community safety as a whole. The analysis presented in this report focuses on the most common themes and comments raised by respondents, although other points made less frequently were also taken into consideration and many of these are also highlighted.

Reviewing the responses to the consultation in their entirety indicates that the majority of respondents support the principles or message behind each strategic priority in general, although some respondents caveated this by saying that certain priorities needed to be expanded upon to be fully comprehensive or cover a particular issue of interest. That said, as standalone strategic priorities intended to set the direction of travel for SFRS, the priorities were, in principle, welcomed widely. A wide range of organisational responses including Local Authorities, Community Councils, Community Planning Partnerships and other public sector organisations indicated that the principles of the draft priorities reflected their organisation's objectives, strategies and the principles which underpin their work.

Frequent reference was made to the notion of prevention and early intervention being key to a wide range of public issues and there was recognition that bodies involved in the delivery of public or community services had to work together to share insights, best practice and resources to tackle shared (or at least often highly related) issues.

There were a number of suggested minor amendments or additions to the drafting of various sections, and some specific concerns expressed. The remainder of this report comprises a more detailed analysis of the comments made in response to each of the 9 questions.

Question 1: Do you agree with the text set out in the section for Strategic Priority 1 of the next Fire and Rescue Framework for Scotland in relation to Prevention and Protection?

Option	Total	Percent
Yes	39	81.25%
No	5	10.42%
Not answered	4	8.33%

A total of 44 respondents answered this question. Of those, the majority (39) agreed with this strategic priority while 5 respondents did not.

Of the 5 responses that answered 'no' to this question, 4 were from individuals and 1 was from an industry organisation. While that organisation did not object to the text, it believes it is not perhaps as succinct or clear as it could be and noted that the implications of Grenfell should be set out in this section. Of the 4 individuals who did not agree with the text in this section 3 provided comments. These comments included that SFRS staff were being asked to supplement Local Authority provision, that SFRS is losing its core purpose by over-reaching into other areas and also that this priority discriminates against those living in rural and isolated communities (although no explanation of this comment was provided).

While 4 respondents did not provide a 'yes' or 'no' answer to this question, 3 organisations provided additional comments and all agreed with the general content of this strategic priority section. One organisation noted that it had some concerns that the priority does not focus enough on property protection.

Of the 39 respondents that agreed with the text in this section, 21 provided further comments. A number of respondents endorsed the approach and principles outlined in the wording of Strategic Priority 1 and welcomed the clear focus on prevention work and partnership working, targeted at the most vulnerable. Comments highlighted the clear commitment to work with a range of stakeholders where SFRS can add value and contribute to positive outcomes.

A number of respondents welcomed the focus for SFRS to continue to pursue effective action to reduce the number of Unwanted Fire Alarms Signals (UFAS) and the weight of SFRS resources that respond to them. 1 Local Authority noted the cost of UFAS to SFRS and therefore the community and highlighted the impact that this can have on communities and the drain on resources otherwise available to tackle wider strategic priorities.

Question 2: Do you agree with the text set out in the section for Strategic Priority 2 of the next Fire and Rescue Framework for Scotland in relation to Response?

Option	Total	Percent
Yes	38	79.17%
No	6	12.50%
Not answered	4	8.33%

A total of 44 respondents answered this question. Of those, the majority (38) agreed with this strategic priority while 6 respondents did not.

Of the 6 individuals that answered 'no' to this question, 5 commented that this section infers a reduction in frontline firefighter numbers. 1 individual commented that this section discriminates against those living in rural and isolated communities due to the risk based approach.

While 4 respondents did not provide a 'yes' or 'no' answer to this question, a fire and rescue organisation commented that Retained and Volunteer Duty System (RVDS) stations, especially Volunteer stations, need to be on Gartan, noting that 'there are over 40 Volunteer stations all over Scotland that are not being utilised or used as a resource when they could be'.

Of the 38 respondents that agreed with the text in this section, 21 provided further comments. In terms of SFRS embracing future opportunities a number of respondents highlighted that the Service should not overstretch its resources in broadening the firefighter role and that necessary funding should be secured in order to meet service delivery needs.

Eight Local Authorities supported the wording in this section highlighting the importance of local partnership working and collaboration, noting that any opportunities to consult with relevant individuals and communities were actively pursued by all partner organisations. It was recognised that it is crucial that the SFRS delivery model reflects the differing needs of local communities. Opportunities to learn from UK and international best practice to enhance operational capability and the safety of its firefighters was also welcomed.

Question 3: Do you agree with the text set out in the section for Strategic Priority 3 of the next Fire and Rescue Framework for Scotland in relation to Innovation and Modernisation?

Option	Total	Percent
Yes	40	83.33%
No	4	8.33%
Not answered	4	8.33%

A total of 44 respondents answered this question. Of those, the majority (40) agreed with this strategic priority while 4 respondents did not.

Of the 4 responses that answered 'no' to this question 3 were from individuals and 1 from a Trade Union. The 3 individuals who responded commented that this strategic priority could lead to the dilution of the core business of a firefighter while the Trade Union believes that the priority does not represent its members' views.

While 4 respondents did not provide a 'yes' or 'no' answer to this question, a Local Authority and industry body provided additional comments. While the Local Authority 'accepted that SFRS can assist in providing a more integrated emergency response and potentially widen its service provision', it went on to say that 'there should be no diminution in SFRS's ability to quickly respond to core business where the firefighters have well recognised expertise and training that no other emergency

service can provide'. The industry body commented that 'given the increasing use of modern methods of construction (MMC) in new residential and commercial developments, it is vital the SFRS understands buildings may incorporate MMC and how the use of MMC may impact their response to a fire'.

Of the 40 respondents that agreed with the text in this section, 25 provided further comments. A number of Local Authorities acknowledged the need for the SFRS to evolve to meet changing environmental contexts and challenges in which the Service operates and the increasing complexity of those challenges. A number of respondents noted that the continual modernisation of the role of a firefighter is essential as risks change, such as those as a result of climate change and an ageing population. Some responses reflected that any changes should be underpinned by sound evidence to achieve outcomes but must not result in cuts or reductions to the Service's current capabilities. Comments highlighted the importance of SFRS embracing a place-based approach to considering what is needed and where in terms of its estate. It was also noted that appropriate impact and risk assessments should support decisions to deliver improved outcomes for communities.

SFRS 'welcome any opportunity to further define modernisation expectations over the years ahead and will continue to place innovation at the heart of service activity in all areas'. The Service also welcomed the specific wording related to RVDS and it agreed that this plays a vital role ensuring our communities are safe and protected.

Question 4: Do you agree with the text set out in the section for Strategic Priority 4 of the next Fire and Rescue Framework for Scotland in relation to Climate Change?

Option	Total	Percent
Yes	40	83.33%
No	4	8.33%
Not answered	4	8.33%

A total of 44 respondents answered this question. Of those, the majority (40) agreed with this strategic priority while 4 respondents did not.

Of the 4 individuals that answered 'no' to this question, 3 provided further comments. Responses here highlighted that that this was an aspirational strategic priority given the age of the SFRS estate and the funding required to make a significant impact in relation to climate change.

While 4 respondents did not provide a 'yes' or 'no' answer to this question, 2 Local Authorities and a fire and rescue organisation provided additional supportive comments. Responses highlighted that SFRS should continue to invest in the provision of specialist resources, technological advancements and forward-thinking operational practices to enhance its response to wildfire events. The overarching aim to reduce SFRS's carbon footprint and operate more sustainably including working towards transitioning to ultra-low emission fleets, renewable energy and heat, low carbon buildings and materials wherever possible was welcomed.

Of the 40 respondents that agreed with the text in this section, 22 provided further comments. A number of respondents welcomed the focus on climate change and

were encouraged that the priority linked well with their own organisation's ambitions in this area. It was noted that SFRS has its own Climate Change Response Plan 2045 and that the Service will require to be at the forefront of planning given the challenges (flooding events, wildfires etc.) which our changing climate brings. A number of respondents who welcomed this new strategic priority highlighted the strong emphasis on effective partnership working and the positive links they already have with SFRS. It was also highlighted that additional funding might be required to fully deliver this priority.

Question 5: Do you agree with the text set out in the section for Strategic Priority 5 of the next Fire and Rescue Framework for Scotland in relation to Effective Governance and Performance?

Option	Total	Per cent
Yes	40	83.33%
No	4	8.33%
Not answered	4	8.33%

A total of 44 respondents answered this question. Of those, the majority (40) agreed with this strategic priority while 4 respondents did not.

Of the 4 responses that answered 'no' to this question, 3 were from individuals and 1 was from a Trade Union. One individual did not see the benefit of spending money to ensure that this priority is met, believing it to be a 'tick-box exercise'. Another individual believed that the Criminal Justice Committee needs to be more robust in holding the SFRS Board and Strategic Leadership Team to task. A Trade Union disagreed with the strategic priority as detailed, commenting that to ensure the health, safety and well-being and improving the capabilities, capacity and performance of its workforce, SFRS needs to commit to investment now.

While 4 respondents did not provide a 'yes' or 'no' answer to this question, 1 Local Authority provided additional supportive comments. It noted that 'effective and regular performance management using an evidence-based approach through data collection and engagement should be central to the approach to ensure that outcomes are being met and improvements identified can be implemented timeously'.

Of the 40 respondents that agreed with the text in this section, 22 provided further comments. A number of respondents agreed that SFRS should ensure it has an effective approach to performance management to support robust scrutiny of the Service at national and local levels. It was noted that this approach should be regularly reviewed and evaluated in pursuit of continuous improvement. Comments supported the collection of data and its use to improve the Service is paramount and should continue to drive SFRS to offer Best Value. One organisation suggested an addition to the use of 'lived experience at Board level to input into decision making, scrutinise strategic direction and provide guidance on local issues affecting communities'. One Community Planning Partnership noted that work to deliver on the statutory responsibility to empower communities has become more important in a COVID-19 environment and something all partners have engaged with and suggested a link to that as part of this priority.

Question 6: : Do you agree with the text set out in the section for Strategic Priority 6 of the next Fire and Rescue Framework for Scotland in relation to People?

Option	Total	Per cent
Yes	39	81.25%
No	5	10.42%
Not answered	4	8.33%

A total of 44 respondents answered this question. Of those, the majority (39) agreed with this strategic priority while 5 respondents did not.

The 5 individuals that answered 'no' to this question provided additional comments. Two individuals commented that this section highlighted that too much effort was put into recruiting people to tick boxes and that unsuitable people are being recruited who are incapable of doing the job safely. Another individual noted that the section refers to Equality issues but highlighted recruitment challenges for disabled people.

While 4 respondents did not provide a 'yes' or 'no' answer to this question, 1 Local Authority and 1 Trade Association provided additional supportive comments for this strategic priority. It was noted that the valued role of a firefighter should be recognised through fair terms and conditions and access to excellent training in preparation for any expanded role.

Of the 39 respondents that agreed with the text in this section, 22 provided further comments. A number of respondents welcomed and agreed that SFRS should continue to promote the equality, safety and physical and mental health of all its staff. The focus in this section on mental health was particularly welcomed. It was noted in numerous responses that SFRS should build on the lessons learned from the flexible working arrangements and use of technology which were developed during the pandemic. A number of respondents welcomed the intention to continue to embrace innovation and change to support the SFRS's People Strategy. Various respondents highlighted the importance that equality is mainstreamed across all functions of the Service and that embedding equality outcomes into the strategic planning narrative was imperative going forward. A number of organisations welcomed the commitment that as a model employer, SFRS should embrace the principles of the Fair Work Convention and the strong commitment to support the training and learning and development of staff to achieve service objectives. One organisation suggested that benchmarking in the context of Equalities and Human Rights may prove challenging to SFRS and were keen for this section to be enhanced.

Question 7: Do you agree with the text set out in the section for Strategic Priority 7 of the next Fire and Rescue Framework for Scotland in relation to Partnership?

Option	Total	Per cent
Yes	39	81.25%
No	4	8.33%
Not answered	5	10.42%

A total of 43 respondents answered this question. Of those, the majority (39) agreed with this strategic priority while 4 respondents did not.

Of the 4 responses that answered 'no' to this question, 2 were from individuals, 1 was from a Trade Union and 1 was from an industry organisation. Comments from individuals included that 'while all public bodies should work together, the encroachment of for-profit companies into the public sector has to stop'. Whilst an industry body agreed with the ethos of partnership working in this section, it noted that 'SFRS should also provide leadership on prevention, protection, and response on its own terms as well'. A Trade Union disagreed with the strategic priority as set out, noting that 'the *Future Vision – Working with Others* section does not recognise the concerns the Union has raised around closer integration with the Scottish Ambulance Service and changes to the firefighter role map'. It highlighted that 'any proposals must come through the National Joint Council and its members consulted through its democratic structures'.

While 5 organisations did not provide a 'yes' or 'no' answer to this question, 2 Local Authorities provided additional supportive comments for this strategic priority, highlighting their well-established collaborative arrangements with SFRS and its partners.

Of the 39 respondents that agreed with the text in this section, 22 provided further comments. A number of respondents commented on the merits of co-locating emergency services in communities, with some noting that this would need to be underpinned by robust evidence that SFRS and partners would achieve improved outcomes for communities. Many respondents welcomed the strong focus on exploring collaborative opportunities within a range of settings (citing community planning, health and social care and community justice). A number of respondents commented that while greater collaboration to achieve better outcomes for communities is welcomed, it requires the appropriate level of training (especially in medical emergencies), and that the SFRS workforce should not be overstretched. It was noted that 'continuing to focus on reducing unintentional physical and psychological harm that could have been predicted or prevented, will help protect the vulnerable in our communities and contribute to local and national outcomes'.

Question 8: Do you think these are the right 7 priorities to be included in the next Fire and Rescue Framework for Scotland?

Option	Total	Per cent
Yes	37	77.08%
No	6	12.50%
Not answered	5	10.42%

A total of 43 respondents answered this question. Of those, the majority (37) agreed that these are the right 7 priorities to be included in the next Fire and Rescue Framework for Scotland while 6 respondents did not.

Of the 6 individuals that answered 'no' to this question, none provided any additional comments.

While 5 respondents did not provide a 'yes' or 'no' answer to this question, 1 Local Authority provided supportive additional comments. Overall, it 'welcomes the Framework which it is considered provides the necessary foundations for SFRS to build on in taking the Service forward'.

Of the 37 respondents that agreed with the 7 priorities, 15 provided further comments. Most respondents provided fairly brief comments, confirming they were content that these are the right priorities for SFRS going forward and some organisations noted that they look forward to working with the Service to help deliver them.

Question 9: Do you think there is anything that is missing from the next Fire and Rescue Framework for Scotland that should be included?

Option	Total	Per cent
Yes	22	45.83%
No	21	43.75%
Not answered	5	10.42%

A total of 43 respondents answered this question with an almost even split of 22 answering 'yes' and 21 answering 'no'.

21 respondents provided further comments on areas which could potentially strengthen the Framework from their inclusion. Suggestions included:

- a suitable timeframe should be introduced in terms of SFRS modernisation;
- remote and rural communities should receive the same level of prevention and protection as urban environments;
- engagement with employees of contractors utilised by SFRS to provide services;
- need to deliver more youth volunteer schemes;
- 'Place' is mentioned in the introduction but there could be explicit mention of the benefits of using a 'place based approach' in the Strategic Priorities, especially numbers 3 and 7;
- there is no indication of SFRS's current or projected budget and whether this new updated framework is compatible with known forward financial resourcing;
- whilst the proposed framework states that SFRS will work in partnership with communities the framework could benefit from practical examples and future plans for engagement, and a commitment to having measurable targets for this; and
- there could be more on how objectives might be achieved, more on liaison with businesses, more on dealing with UFAS using SFRS's data, and more on using SFRS to improve the standard of Fire Risk Assessment.

Of the 21 respondents that answered 'no' to this question, 5 offered additional comments, all confirming that there is nothing further to add to the Framework as drafted.

NEXT STEPS

We would like to thank all respondents for taking the time to respond to this consultation. In light of the comments received, the Framework will be amended accordingly in a number of areas. The amended Fire and Rescue Framework for Scotland 2022 will be published on the Scottish Government's website and introduced to the Scottish Parliament by Parliamentary Order.

Many of the Framework's priorities are overarching and are relevant for several aspects of SFRS's role. HM Fire Service Inspectorate (HMFSI) will use the priorities to inform future inspection planning. In addition, SFRS must have regard to these priorities when developing its Strategic Plan; in essence the Framework sets out at a high level what Scottish Ministers expect SFRS to focus upon, and the Service's Strategic Plan should set out the details of how SFRS intend to achieve this.

Scottish Government
Fire and Rescue Unit: Safer Communities Division
March 2022

List of Consultation Respondents

Organisations

Fire Brigades Union
The Edinburgh Community Safety Partnership
Scottish Community Safety Network
Scottish Futures Trust
Audit Scotland
NHS Ayrshire and Arran
Scotch Whisky Association
Association of British Insurers (ABI)
East Ayrshire Council
South Lanarkshire Council
Perth & Kinross Council
North Ayrshire Council
West Lothian Council
Argyll and Bute Council
Fire and Rescue Services Association
Scottish Fire and Rescue Service

Individuals

Patrick Burns
Anthony Mclaughlin
James Campbell
James
John Ferguson MBE
Derek Sinclair
Mike Boyle



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