THE FIRE BRIGADES UNION

RESPONSE TO CONSULTATION

HERTFORDSHIRE COUNTY COUNCIL
FIRE AND RESCUE AUTHORITY
DRAFT COMMUNITY SAFETY PLAN
2006/2007

FOR THE CHIEF FIRE OFFICER
HERTFORDSHIRE FIRE & RESCUE SERVICE

26TH January 2006
Introduction

This submission follows detailed representations given by the Fire Brigades Union (FBU) to various groups and panels consisting of Elected Members, Members of Parliament, Local Councillors, Service Managers, Community Groups and the Public. Detailed information, evidence and explanation has been provided during these representations and so this submission is intended to be a concise overview of the FBU’s response on behalf of the professional Firefighters - WhOLETIME, Retained, Control and Officer Members – who are the professionals with strategic and first-hand practical experience of delivering high quality emergency response and fire prevention services to their communities.

It should be recognised that it is our multi-skilled professionals who have successfully delivered their disciplines over many years, through to the present day and it will be their multi-skills and professionalism that will innovate, develop and successfully deliver the integrated disciplines in the future. And it is worth remembering that, off-duty, our Members and their families are also members of the community that receive and pay for the professional, life-saving service we provide and so it is in the vested interest of FBU Members to ensure a robust and efficient Community Safety Plan. Quite simply, for all the reasons above, we suggest it wise to take notice of the professional voice of our Members.

Integrated Risk Management Planning

The Fire Services Act (FSA) 2004:

- Places a new statutory duty on fire authorities to promote Fire Safety;
- The continued statutory duty to prepare emergency response to fires;
- A new statutory duty to prepare emergency response to Road Traffic Accidents;
- Responsibility to prepare emergency response for other new and specific emergencies set out by Statutory Order e.g. flooding and terrorist attacks;
- New powers to prepare properly for other risks to life and the environment identified in local IRMP.

Clearly, the FSA 2004 places significantly increased responsibilities on fire authorities both in providing resources for promoting Fire Safety AND in providing resources for an increased list of emergency incident types for which Emergency Response resources must be provided.

The Office of the Deputy Prime Minister has issued guidance for fire authorities on a risk-based approach to planning the resources they require to meet the increased statutory duties placed upon them. The Fire Brigades Union (FBU) fully supports the principles of a proper integrated risk management planning process as a basis for locally determining and improving both preventative and emergency response standards for the communities we serve.
Emergency Response

The FBU is concerned that the Hertfordshire Fire and Rescue Service, (HFRS) Community Safety Plan (CSP) was produced against a background of efficiency saving. As a result, the plan fails to comply with the Office of the Deputy Prime Minister’s (ODPM) guidance on risk based emergency planning.

The FBU draws attention to four key provisions set by the ODPM as guidance for the Fire and Rescue Authority to follow in the development of their Integrated Risk Management Plan:

1. **Response Planning** – A fundamental part of fire service emergency cover is the determination of what response is required to incidents.”

2. **Planning an appropriate response** involves:
   - Defining the Planning Scenario (PS) that each risk area attracts
   - Deciding what resources are required in that scenario
   - Deciding how to ‘phase’ those resources i.e. in what order and what intervals they should arrive.

   **Fire and Rescue Services will need to provide evidence** that the planned response is safe and appropriate. This is likely to involve carrying out detailed risk and task analyses of the planning scenarios.

3. “An important consideration throughout all stages of producing an IRMP is the maintenance of **safe systems of work for firefighter safety**.”

4. “Authorities should only make changes where it is clear that the overall net effect will be to improve community safety.”

On 14th September 2005, the FBU submitted to the Chief Fire Officer 13 basic Planning Scenarios for fires in domestic dwellings accompanied by detailed risk and task analyses to assist him in the development of a proper and robust IRMP. We have given further detailed explanations of our “Critical Attendance Standards” methodology (CAST) - developed by Fire Service professionals and other Fire Service stakeholders - during recent representations to Elected Members.

Alarmingly, the FBU has received no evidence of a systematic assessment used to identify or list the many and various Planning Scenarios that each risk area in Hertfordshire attracts. We have received no evidence of a systematic assessment of the resources that HFRS would need to ensure are provided in order to respond effectively to each of the emergency scenarios that we can expect to occur in Hertfordshire. We have received no evidence of a systematic assessment of the appropriate order in which such resources may be phased.
Instead of evidencing an ODPM recommended methodology, the Draft CSP focuses on a loose definition of how long emergency callers can expect to wait for some of the existing resources to arrive at some incidents.

Given the increased statutory duties in respect of emergency response; given the absence of the necessarily competent and detailed risk and task analyses; and given the cuts to emergency response resources proposed; the FBU believes that insufficient consideration has been given in the CSP to ensuring “safe systems of work for firefighter safety”.

**Prevention Is Better Than Cure?**

Fire and Rescue Service intervention has a proven record of effectively improving community safety by rescuing people from danger in emergency situations. In 2003, in England a total of 3,868 people were rescued alive from fires in the home by the fire service - a 42% increase over a 10-year period. Of these: 2,441 had suffered injuries and 1,427 were rescued unharmed give a total of 3,868 rescues. According to ODPM annual fire statistics, there were a further 345 fatal casualties in dwelling fires in England.

The total of 4,213 persons who needed to be rescued from fires (those rescued alive plus those who died) in the home is made up of those 3,868 who were successfully rescued alive PLUS the 345 who died. In this ‘at risk’ group in need of fire service rescue, the survival rate is 91.8%.

So, ODPM statistics show that **9 out of 10 people involved in fires in the home are rescued alive by Fire Service Personnel.** Emergency Response Resources have a demonstrable impact on community safety.

Conversely, evidence of the effectiveness of the prevention work undertaken by HFRS to date is not contained within the plan and recent data suggests that property fires are on the increase in some areas of the County.

**Attendance Times**

The Draft CSP states that: “The previous response standard for dwelling fires in Hertfordshire was 10 minutes in urban areas and larger towns (C Risk)…”

In fact, the old national standards of fire cover for C Risk areas was for an initial attendance in 8 to 10 minutes and so the deliberate reference to the slower, maximum limit is a little misleading. However, one of the primary motives for repealing the old national standards of fire cover was that the attendance standards were based on property type and value rather than on life and the health of people.
Bigger, more expensive, commercial and industrial premises were categorised as A Risk or B Risk affording them more fire engines, more quickly than would be sent to homes where people lived and slept. The old standards meant that A Risk and B Risk properties required the first fire engines to attend within 5 minutes and the back up fire engines within 8 minutes. The introduction of a risk-based approach to emergency cover through IRMP’s is intended to put the saving of life at a value at least equal to, if not higher than, the saving of property. It is in this context that the merits of the attendance standards proposed in the Draft CSP should be judged. Rather than striving to improve emergency response times to people in their homes to the level previously required for A Risk and B Risk properties, it seems the Draft CSP prefers to drag all initial attendance times down to the slowest end of the times required in the old standards for C Risk areas. We make more specific reference to these proposals later in this submission.

**Overview**

Simply:
- The FBU regards the Draft CSP proposals as a cuts package and not a properly conducted Integrated Risk Management Plan;
- The FBU believes the target attendance times are too slow in theory, would mean slower attendance times to many emergencies in practice and would have a detrimental impact on firefighter and public safety;
- The FBU believes the case for the prevention proposals affording cuts in Emergency Response is not sufficiently made or evidenced.

Until such time as compelling evidence is disclosed that stands up to scrutiny and it is clearly evidenced that the overall net effect will be to improve community and firefighter safety, the Fire Authority cannot expect the experienced and professional workforce that actually delivers the life-saving service to the public to be convinced by the Draft Community Safety Plan.
Highlighted Proposals

1. Community Safety Task Force

The FBU welcomes HFRS proposal to promote Fire Safety Education by establishing a Community Safety Task Force. However, other than a broad overall sentence in the Draft CSP, we have seen no detailed description or analysis of the actual tasks the personnel involved will undertake, the quantity, duration or frequency of that work, the qualifications and training necessary, nor therefore have we seen any evidence of the Task Force’s likely effectiveness to afford a reduction in the emergency response capacity available to deal effectively and safely with those emergencies that will, inevitably, still occur.

By contrast, the Draft CSP does highlight in some detail the need for the personnel in the Community Safety Task Force to cover the shortage in both wholetime and retained firefighters employed at fire stations to respond to emergency calls.

The FBU is concerned at the balance of the proposed shift in resources from intervention to safety education – estimations calculated from the Chief Fire Officer’s approximate financial projections indicate a cut of approximately 51 Firefighters and Officers from Emergency Response Roles and only a redeployment of approximately 10 posts (primarily non-emergency response roles) in the Community Safety Task Force.

This imbalance is further compounded as it is abundantly clear from the Service’s own evidence that the current rider levels on HFRS fire appliances throughout the County have been, and continue to be, dangerously low. So, whilst the primary function of the Task Force as proposed is apparent, we believe that in order to make up the existing short falls in crewing levels on frontline appliances, their availability to undertake those primary functions effectively will be severely compromised.

The FBU supports in principle the creation of a Community Safety Task Force, but we cannot support such an initiative at the expense of frontline, emergency response capability. Professional, frontline, Emergency Response Firefighters are ready, able and best placed to fulfil this Fire Safety Education function as part of their dual role at their existing fire stations along side the intervention duties that they carry out in their communities. That is the most cost-effective and productive use of Firefighters’ skills.
2. New Attendance Standards

We would reason that the proposed changes to the attendance standards in HFRS have not improved and it must be recognised that in line with national custom and practice, HFRS have been mobilising a minimum of 2 fire appliances to all property fires.

Therefore in reality the proposed new attendance standard to property fires of 1st in 10 minutes, the 2nd in 13 minutes on 90% of occasions is a lower/slower response than those currently adopted by HFRS and will leave the people of Hertfordshire with the worst response times in the East of England if not the entire UK.

The proposed attendance standards are the excuse upon which the proposals to close fire stations, downgrade fire engine availability and disrupt long-established and popular shift-patterns are based. The FBU believes the proposed attendance standards have been deliberately selected to facilitate pre-determined budget reductions that detrimentally affect the service we provide to the public and the working conditions of those that deliver it.

To compound our concerns, at the time of writing this submission, controversy has arisen surrounding the very basis upon which the attendance standards have been measured. The Chief Fire Officer has stated that, “Measurement of attendance time has always been and will continue to be from the time the station was alerted.” The Draft CSP states that the 10 and 13 minute attendance standard “includes call handling and turnout time”. This contradiction must be clarified as it impacts directly on many of the other proposals in the CSP.

3. Officers Duty Rota System

We are concerned that the Fire Authority has been treating this issue as unrelated to the IRMP. This is clearly not the case as it is included on page 36 as Proposal No. 3 and represents a reduction in operational posts.

The proposal, referred to as ‘realignment’, is to reduce the number of officers by 5 and subsequently increase working hours to 78 hrs per week for the remainder.

Audits carried out by both the FBU and the HFRS have highlighted ‘high stress levels in these individuals due to excessive work loads compounded by long working hours’. In addition a work life balance report produced by Couts at some cost to the service in 2001 drew attention to the need to reduce the working hours of this group. These findings appear to have been ignored.
4. Aerial Appliance fleet

Until such time as the FBU is informed of the intended locations and deployment of the aerial appliances in Hertfordshire and until we have considered those intentions against the necessary detailed risk and task analyses and the implications for compliance with the Working At Height Regulations 2005, the FBU is unable to support the proposal to reduce the aerial appliance fleet.

5. Hemel Hempstead, Stevenage and St Albans

Reducing the number of fire fighters at Hemel Hempstead, Stevenage and St Albans from 13 to 12 will only exacerbate the Service’s ability to maintain critical safety crewing levels on all fire appliances throughout the year.

Notably, these three station grounds cover the highest risk areas in the County

The removal of fire fighters from these stations will also impact on the brigade’s global crewing levels, resulting in a shortfall of personnel and consequently, the Service’s ability to maintain adequate fire cover at all times.

The FBU have carried out an extensive analysis of the Critical Attendance Standard (CAST), concluding that a minimum crewing level of 9 fire fighters is required for a single occupancy dwelling fire. For this reason it would be wholly unacceptable for HFRS to mobilise any fire appliance- whole time or retained - with any less than 5 on the first appliance and 4 on the second appliance to a dwelling fire.

The Draft CSP relies upon low levels of sickness to justify this reduction to take place. The plan does not identify how these levels are to be maintained or improved.

Furthermore we find it somewhat illogical and contradictory for HFRS to argue the need to increase the crewing levels at Hitchin and Bishops Stortford when at the same time it is reducing the crewing levels of these three stations to a level acknowledged as being to low.
6. Watford

The FBU draws attention to the following facts:

a. The previous review of standards of fire cover in Hertfordshire identified areas of Watford as high risk. It also confirmed previous HMI reports of under provision of fire cover for South Oxhey.

b. The most recent assessment of risk under the IRMP process still identified areas of high life risk in Watford. The draft Community Safety Plan still fails to improve fire cover for South Oxhey.

c. The population continues to increase in Watford, with the majority living in densely populated areas of affordable housing, including high-rise and multi occupancy dwellings.

d. Watford has identified areas of serious social and economic deprivation.

e. Black and Minority Ethnic (B.M.E.) households are less likely to own smoke alarms. Watford has the highest percentage B.M.E. community in Hertfordshire (20% of population). B.M.E. households are predominantly found in the poorest areas of Watford.

f. In the 2005/6 IRMP, Watford was found to have the highest rate of accidental dwelling fires per 1,000 populations in Hertfordshire. Recent data suggests this is still the case. Watford also has a high number of fires in high risk Houses of Multiple Occupation (HMO’s), Sheltered and Warden Assisted accommodation.

g. National statistics from ODPM show that people are more likely to be seriously injured and die from fires whilst asleep in their beds at night. HF&RS warn that 50% of all house fires occur between 11pm and 12pm at night. The statistics indicating higher activity levels (emergency call-outs) of the fire crews at Watford during the day mask the actual risks of dwelling fires and serious injury that occur at night.

h. The Emergency Response Firefighters at Watford perform a dual role – intervention and prevention. 27% of the Community Fire Safety Education work delivered to the communities in Watford is delivered at night by the existing Emergency Response Firefighters at Watford. 70% of Home Risk Assessments carried out by operational crews in Watford are conducted at night by the Emergency Response Firefighters at Watford.
The FBU cannot support a reduction in the vital, life-saving emergency cover provided by the second appliance at Watford and the effective, cost-efficient preventative work the crew undertake in the community at night.

7. Revised working hours for whole time and day crewed stations.

There is no evidence to support the claim that a change to 12-hour shifts makes any increase in productivity hours for CFS during the evening; the existing 15-hour night shift allows an uninterrupted 6-hour period from 1800 hrs to midnight available for CFS work.

The flexibility afforded by different duty-systems starting and finishing at different times can in fact be an asset during busy periods of spate calls and major protracted incidents such as that experienced at Buncefield; the flexibility can be a significant benefit to the organisation of relief crews and other operational movements both in terms of crew welfare and avoiding overtime costs. The minimal financial savings in retained costs at day-crewing stations would be far outweighed by the detrimental impact on the long-established, family friendly arrangements supported by wholetime firefighters.

This is a contractual, condition of service issue. The FBU would oppose any unilateral imposition of changes to hours of duty. Initial consultation suggests that the vast majority of Members wish to remain on the current shift system and causing such industrial relations disharmony can have a long-term, detrimental impact on morale and work force performance.

8. Increasing the number of firefighters at Bishops Stortford and Hitchin fire stations

The FBU raised concerns over the reduction of the establishment levels at Hitchin and Bishops Stortford fire stations from 14 to 12 in 1999.

We therefore, welcome this proposal to return the establishment levels at these fire stations to their original status. However, we oppose it being at the expense of establishment levels at other fire stations.
9 & 10. The Closure of Bovingdon and Radlett

The FBU will vigorously oppose the proposed redundancy of any of our Members.

These closures are based on the attendance standards, which, as previously stated, contain a significant contradiction within the planning process that must be addressed.

Further, we believe that by removing the community service provided by these stations, the Fire Authority goes against local and national government policy on social inclusion.

The ODPM state under the heading 'Modernisation' in their Review of the Retained Duty System (RDS) that:

"Firefighters working on the RDS are in a position to make a key contribution to the modernisation programme. For example, their close links to the local community could make a significant difference to Community Fire Safety work".

The proposal to close these stations and rely on a prevention taskforce occasionally visiting the area clearly contradicts the view of the ODPM.

We welcome the submissions from the action groups associated with these stations and believe that they have set out sound cases for the withdrawal of these proposals.

11. Royston

In their risk analysis the Service has stated:

‘That due to the low number of calls in the past and the low risk rating Royston and the surrounding area could still achieve the new ‘Fire Cover’ standards if the station was served by a retained unit’.

Royston and its surrounding area could not meet the new standards of Fire Cover, but Buntingford and its surrounding areas would not be covered by the criteria either.

The toolkit supplied by the Office of the Deputy Prime Minister (ODPM), the FSEC system, is based on the 2001 Census. Through our research and talks with North Hertfordshire District Council, South Cambridgeshire Council and local Estate Agents, not forgetting looking at the Office of National Statistics web site, we have found that Royston is the fastest growing town in North Hertfordshire.
Royston has a growth rate of 14.25%, while North Hertfordshire’s growth is 3.3%. The County has grown by 1.56%. These statistics are from 1999 to 2003. This equates to an increase in population for the Royston area of approximately **2376 people**.

In the south Cambridgeshire area this growth is 3.3%, which equates to an increase of 663 people.

The total increase of population covered by the Royston Fire Station personnel is **3039** in the period from 2001 to 2005.

These figures have not been used in the calculation of the ‘dwelling risk profile’. This must put some question marks against the proposed Resource plan.

The loss of up to 5 wholetime firefighters equates to a reduction of 41.5% of the wholetime firefighting capability. 5 experienced, professional firefighters lost to this community. Not just from 0600 to 1800, 42 hours a week, as their contracts state but for the retained cover that those firefighters guarantee. Wholetime firefighters at Royston Fire Station commit themselves to 18 out of a possible 24 hours cover each time they are on duty.
Conclusion

The proposals put forward in the draft community safety plan 2006/07 will increase the risk to fire fighters the public that we serve.

The likelihood in the severity of injuries to persons reported in dwelling fires and other emergency scenarios will also increase and this will be exacerbated by the proposed reduction in attendance times.

We believe that those responsible for the formulation of this plan have failed to take the opportunity to improve service delivery through this process in line with ODPM guidance, opting instead to use the process to achieve predetermined savings.

Whilst we fully support the concept of a Community Safety Task Force to provide valuable education, prevention and protection to our community, this must not be at the expense of those personnel carrying out these functions together with their intervention role, as is currently the case.

The FBU fail to comprehend how closing stations, reducing fire cover and attendance standards will provide a ‘Safer Community to live and work in’, in accordance with the HCC pledge.

Should the Fire Authority accept this plan, we intend to pursue a lawful trade dispute, one of the main purposes being to maintain and improve firefighter safety.

Withdrawal of the plan will also be in the interests of public safety.

The Fire Brigades Union.