



MERSEYSIDE BRIGADE

Response to Merseyside Fire & Rescue Service Community Risk Management Plan 2024 – 2027

Written and compiled by Merseyside Fire Brigades Union

Fire and rescue spending

November 2023



The cost of the fire and rescue service

Net current expenditure on UK fire and rescue services

£3bn

England

Scotland

Wales

Northern Ireland

£2,421 million

£294 million

£164 million

£90 million

Fire spending on employees - wages, National Insurance etc

75%

Overall public spending

Central government expenditure as set out by the Treasury

£500bn

Central and local government spending on public services

£1tn

National income - Gross Domestic Product (GDP) for the UK

£2.2tn

Costs of fire and rescue

Cost of the UK fire and rescue service per person per year

£50

Cost of the UK fire and rescue service as proportion of central government spending

0.6%

Cost of the UK fire and rescue service as proportion of spending on public services

0.3%

Value of the fire and rescue service

Value of the fire and rescue service in England (lives saved, property, protection)

£13bn

Value of the fire and rescue service relative to its cost

6 times

Foreword

‘The fire and rescue service is an essential public service and a national strategic asset. Firefighters tackle every kind of emergency, 24 hours a day, 365 days a year. Firefighters receive the first call people make when it matters most and are the first line of defence when things go wrong. The Fire Brigades Union (FBU) is proud to represent the vast majority of firefighters across the UK. The UK fire and rescue service can mobilise ten thousand firefighters in a matter of minutes to tackle almost every emergency imaginable. Specially trained firefighters are on duty at all times, ready for deployment to incidents, large and small. The arrival of professional firefighters, swiftly and with appropriate numbers and adequate resources, is of tremendous value, both to those immediate victims who need our help and politicians who are accountable when things go wrong.’

FBU General Secretary Matt Wrack.

The FBU firmly believes in and supports the process of Risk Management Planning as described in all of the current national guidance documents. It is the aim of the FBU to work proactively with both Merseyside Fire and Rescue Authority (MF&RA) and Merseyside Fire and Rescue Service (MF&RS) to implement, and to further develop the Community Risk Management Plan (CRMP) process.

Fire and Rescue Services are fortunate in that the majority of their employees are members of a single representative body, the FBU. By involving the FBU in the CRMP planning cycle, MF&RS has the opportunity to draw on the combined experiences of the majority of its workforce when considering the health and safety implications of potential systems of work and service delivery.

The overwhelming majority of firefighters working for MF&RS are members of the FBU and in compiling this document as part of the required consultation process, it was our aim to ensure that the voices and opinions of those professional firefighters were accurately reflected within. To that end, from the 9th April 2024 - 16th May 2024, Merseyside FBU undertook an extensive member consultation, totalling over 20 meetings and covering the vast majority of workplaces in MF&RS.

At those meetings, members were given all of the information that has been provided to FBU officials by MF&RS, members were then given the opportunity to ask questions, raise concerns and participate in a survey in relation to certain proposals contained within the CRMP. It is the belief of Merseyside FBU officials that our members are the undisputed occupational experts and as such, their thoughts, concerns and professional opinions must be prioritised above all else when considering any change to the way MF&RS delivers its core functions.

The FBU represents **539** firefighters working in MF&RS which equates to approximately **83%** of all firefighters working in MF&RS. During the course of our consultation, we received survey responses from **391** firefighters, giving us an overall engagement of **72%** of FBU members. That data, alongside data provided by MF&RS has been used within this document to respond to the proposals as set out in MF&RS Draft CRMP 2024-2027.

To the best of our knowledge, all data and information contained within this document was correct at time of authoring and has been provided in good faith by Merseyside FBU.

Draft CRMP 2024 - 2027 Proposals

Merseyside Fire and Rescue Service Proposal 1

Increase our fire engines from 32 to 34

Proposal	Why we are proposing this	Expected benefits
Increasing fire engines from 32 to 34.	We've been building back in resources in innovative ways since 2019 and want to continue with this.	This would enhance our specialist response and give us increased resilience across Merseyside (for larger incidents for example)

Merseyside Fire Brigades Union (FBU) Response

Since 2003, Merseyside Fire and Rescue Service (MF&RS) has seen an overall reduction in frontline fire appliances from 42 to 32 and a reduction in firefighter numbers from 1419 to 642. Whilst it has been encouraging to see the number of frontline appliances once again begin to rise, the way in which appliances are crewed has not been without issue for the Fire Brigades Union (FBU) and our members. A point in case has been the introduction of 2 new duty shift systems 'Day Crewing Wholetime Retained' (DCWTR) and 'Hybrid, which were introduced at point of entry, on an offer and acceptance basis and as such were not subject to negotiation with the FBU. Due to the manner in which these systems were introduced, they have remained the subject of local dispute since 2016 and 2018 respectively.

Following several unsuccessful attempts at conciliation, these duty shift systems were the subject of local industrial action from December 2022 - May 2023. Despite

the manner in which these duty shift systems were introduced, the FBU share the view of MF&RS that the variety of duty shift systems on offer have proven popular with members and with that in mind the FBU have sought to reach agreement with MF&RS on all duty shift systems currently operating within Merseyside. To that end, the FBU once again sought external assistance from the National Joint Council (NJC) joint secretaries and participated in conciliation talks from 11th - 13th October 2023, in the hopes of resolving these longstanding disputes. Despite those talks being productive, at time of writing this response to the Draft Community Risk Management Plan (CRMP), these duty shift systems remain unagreed and the subject of a live trade dispute.

Moving to the proposal to increase fire appliances from 32-34, whilst supportive of the introduction of two additional fire appliances, it must be noted that these proposals represent a further expansion of the non-agreed Hybrid duty shift system. Further to this, in the view of the FBU the introduction of 2 additional retained appliances, to be crewed by members at locations that currently operate under the agreed 224 duty shift system could lead to the following additional complications:

- I. In the MF&RS Draft CRMP, Hybrid duty stations are described as follows;

‘During the day two fire engines are available on station with a third available on a 30-minute recall (retained) and at night one fire engine will be available on station with two available on a 30-minute recall to make sure we have enough fire engines available to deal with the incidents that might occur (resilience).’

With the current proposal to introduce 2 additional retained appliances at existing locations, MF&RS will essentially be creating two new locations that do not conform to any current duty shift system, agreed or otherwise. Moreover, the description of the ‘hybrid’ duty shift system as stated above, could potentially give rise to confusion, as members of the public will quite rightly expect that *‘During the day two fire engines are available on station with a third available on a 30-minute recall (retained).’* It must be highlighted that at this moment in time, Liverpool City Centre fire station has only one wholetime appliance crewed for both the day and night shifts and as such, **does not** conform to the specification provided by MF&RS for a ‘Hybrid’ station.

- II. Due to the fact that at the time of authoring this response both the DCWTR and Hybrid duty shift systems remain unagreed and the subject of a live trade dispute between the FBU and Merseyside Fire and Rescue Authority (MF&RA). Any attempt to expand either duty shift system without prior negotiation and agreement with the FBU, will in all likelihood lead the registration of a further trade dispute and the deterioration of industrial relations between the FBU and MF&RS.

- III. It is the understanding of the FBU that one of the overriding reasons for implementing this change, is to ensure that members currently working outside of the DCWTR and Hybrid duty shift systems, who hold an additional 10% retained provision are located primarily at two locations. This will allow MF&RS to utilise those members for retained duties with minimum impact on service delivery the following shift due to provision of compensatory rest. Whilst this arguably does represent better value, it does give rise to concerns that wholetime fire cover at the two chosen locations could be compromised due to the requirement to provide compensatory rest to members mobilised the previous shift under their retained contract.
- IV. If it is the intention of MF&RS to introduce 2 additional retained appliances at existing locations, to be crewed by members that hold a retained provision, there is the issue of mass upheaval and disruption for members that will have to leave those locations and conversely, for members that will be required to move to those locations. The wholesale relocation of personnel is something the FBU and indeed MF&RS has always sought to avoid due to the impact not only on our members work life, but their homelife also. This effect will be compounded by the fact that the members moving into the proposed locations will be expected to adopt a completely new way of working, under a duty shift system that many will have no experience of. This will undoubtedly lead to friction within the workforce if staff moves are not dealt with sympathetically.

Moving to the ask in relation to enhancing specialist response. It is the view of the FBU that the move away from the wholetime crewing of most specialist appliances, in favour of utilising retained arrangements or 'complimentary crewing' has undoubtedly slowed the arrival of specialist assets to the incident ground. Further to this, the utilisation of retained members to crew specialist appliances, does on occasion, impact wholetime fire cover due to the requirement to provide compensatory rest to members mobilised under retained arrangements.

In relation to 'complimentary crewing', in essence, this system utilises on duty personnel to crew both the wholetime appliance and the specialist appliance, requiring a single crew to split across 2 appliances and proceed to an incident in convoy. Whilst in theory this practise works, it has led to the following issues:

- I. A requirement for Officers in Charge (OIC) to drive fire appliances whilst simultaneously carrying out the role of appliance commander. This practise has been perceived to place additional stress and responsibility on OIC's whilst proceeding to incidents owing to an inability to brief crews and plan for initial actions on arrival at an incident.
- II. Appliances becoming separated on route and arriving at incidents without the required safe crewing levels. Members arriving at incidents in either the wholetime or specialist asset can face concerted moral pressure to act without the ability to put in place safe systems of work to ensure the safety of crews and

members of the public. These occurrences have been reduced but not eliminated by the policy of proceeding to incidents in convoy when required.

- III. Delays in mobilising specialist assets due to the required crew already being engaged at an incident. On these occasions, it has been necessary for crews to leave the incident ground and return to home station to collect the necessary appliance.

The FBU remain committed to the whole-time staffing of specialist appliances as the only way to ensure the timely, consistent and most importantly, safe mobilisation of appliances.

In summary, whilst the FBU support the introduction of two additional fire appliances, MF&RS must agree to work proactively with the FBU to manage change and examine the efficacy of the continued expansion of the retained provision. To proceed in any other fashion would in our opinion, be industrially reckless.

Merseyside Fire and Rescue Service Proposal 2.

Reintroduce Small Fires Units

Proposal	Why we are proposing this	Expected benefits
Reintroducing a Small Fires Unit.	A smaller vehicle needing fewer fire fighters could help when we have large numbers of lower-level incidents (non- life risk).	This would free up traditional fire engines for bigger emergencies or incidents where lives are at risk.

Merseyside Fire Brigades Union (FBU) Response

In the early to mid-2000's, MF&RS brought into service a number of small fires units (SFU's). These SFU's were essentially vans, crewed by three firefighters, carrying a quantity of water and a single breathing apparatus set. The SFU's operated from Fire Service Headquarters (FSHQ) during times of peak demand and were designed to attend small fires. It is a matter of record that Merseyside FBU opposed the use of these SFU's and were supportive of the decision taken to remove them from service.

The primary objection raised by Merseyside FBU in relation to the past introduction of these vehicles lay in the inability of a crew of three firefighters, with a limited

quantity of water and equipment to tackle an escalating incident, should the need arise. Nothing that has occurred in the intervening years since the withdrawal of SFU's in Merseyside has allayed those concerns.

In addition to the inability of a crew of three to tackle an escalating incident, we must also remain cognisant of the dangers posed if an SFU is mobilised in error to an incident or if crews are flagged down to an emergency incident in the pursuance of their duties.

The Review of Standards of Emergency Cover undertaken by Government in 1999 recognised this problem, and the 'Pathfinder' report is crystal clear on this point. In any planning decisions relating to when the required firefighters and equipment should arrive at an emergency incident, it warns against placing firefighters in a position where they have no option but to act - even when there are insufficient resources available:

"... it is essential to avoid situations which could motivate or pressurise firefighters to act unsafely in the interests of saving life."

(Review of Standards of Emergency Cover - Technical Paper C - Response & Resource Requirements)

To be clear, regardless of how infrequently something may or may not happen, there is no justification for knowingly placing firefighters in a position where they may be morally forced to act, despite an inability to put in place agreed safe systems of work.

In addition to the safety concerns highlighted above, we must also heed new and emerging research in relation to contaminants within the fire and rescue sector. The Fire Brigades Union alongside Professor Anna Stec and the University of Central Lancashire (UCLAN), have led the way in demonstrating the link between firefighting and occupational cancers and the importance of decontamination following firefighting operations.

In light of the importance now placed on firefighter decontamination, historic practises of operating SFU's on an overtime basis during times of peak demand, without access to washing facilities and additional firefighting Personal Protective Equipment (PPE) simply would not hold up under scrutiny. Furthermore, given the nature of the incidents historically tasked to members crewing SFU's, it is our belief these vehicles would not provide best value to members of the public given the disproportionate amount of time that would be spent decontaminating crews and replenishing PPE.

In summary, the FBU believe that the decision taken to withdraw SFU's from service in Merseyside was the correct one and we do not believe reintroducing them represents best practice for our members or best value for the taxpayer. For the reasons listed above, the FBU are unable to support any proposal to reintroduce SFU's.

Merseyside Fire and Rescue Service Proposal 3

Protecting our fire engine availability for life risk incidents.

Proposal	Why we are proposing this	Expected benefits
Protecting our fire engine availability for life risk incidents.	Sometimes fire engines become unavailable at short notice (e.g. staff sickness). We are interested in how we can avoid that and still deliver a response to non-life risk incidents with three firefighters when this happens.	We would maximise our fire engine availability whilst protecting life risk resources.

Merseyside Fire Brigades Union (FBU) Response

Before moving to discuss the substantive issues, which make up the FBU response in relation to this proposal, it must be noted that when presented to the focus groups carried out by Opinion Research Services (ORS) in 2023, the question put to members of the public was as follows;

‘Do you think MFRS should consider keeping fire engines available by crewing them with three firefighters, but restricting them to non-life risk incidents such as small fires?’*

The fire engines would be a non-life risk resource until four firefighters were available; through overtime or an additional firefighter being moved from another station. *

However, when presenting this proposal to firefighters during the consultation period, MF&RS referred to this proposal simply as ‘Maximising fire appliance availability’. This shift in language, although slight, indicates to the FBU that MF&RS are entirely cognisant of the fact that proposals to crew any fire appliance with three would be neither welcomed, nor accepted by the FBU.

The other element of concern arising from the ORS focus groups in relation to this proposal, is the question itself, and the manner in which it was posed to 74 members of the public. 74 members of the public, who in all likelihood, have never worked as

operational firefighters and as such, have a limited understanding of the safe systems of work we are required to put in place to ensure firefighter safety.

When presented with the choice of keeping a fire appliance on the run with three riders or losing an appliance entirely due to short notice staffing abstractions, it is hardly surprising members of the public indicated a preference for an appliance crewed with three.

Moving to the rationale behind the proposal to crew fire appliances with three riders, MF&RS have cited appliance unavailability due to short notice staffing abstractions such as sickness. During discussions in the planning phase of the draft CRMP, figures were presented to MF&RA which indicated that during 2022/23, fire appliances had been off the run (OTR) due to short notice staffing abstractions for **2184 hours**, this has also been equated to one wholtime appliance being unavailable for **three months and one day** over the period of one year.

Before continuing, and for the avoidance of any doubt, the FBU wholeheartedly agree that fire appliances should be available 24/7, 365 days of the year. This position can be confirmed through all local and national campaigns led by the FBU to protect frontline fire appliance response and ensure a fire and rescue service that is fit for purpose. That being said, we are unable to support **any** proposals that knowingly place FBU members at elevated levels of risk, in an attempt to paper over the cracks that have been created following years of austerity and cuts to frontline funding.

When interrogating the data provided on appliance unavailability due to short notice staffing abstractions, it is important first of all to understand what the figure of **2184 hours or three months and a day** actually represents in relation to overall fire appliance unavailability.

In figures provided by MF&RS, there were a possible;

22630 shifts in 2023
2184 hours or three months and one day of
unavailability = 182 shifts
182 shifts out of a possible 22630 = 0.80%

When considering short notice appliance unavailability figures from 2022/23, it is worth noting that from December 2022 - May 2023, Merseyside FBU members undertook local industrial action in the form of refusing to undertake pre-arranged overtime. This action came in response to years of sustained attacks on our members

terms and conditions of service and the introduction, without negotiation, of the DCWTR and Hybrid duty shift systems.

As highlighted at all points prior to, during, and post local industrial action, all issues detailed on the ballot paper could have been resolved immediately, at minimal cost to MF&RA and without removing any service currently being provided to the public of Merseyside. Despite this, industrial action was allowed to continue, with MF&RS opting instead to close fire stations and take fire appliances off the run.

When considering statistics in relation to short notice fire appliance unavailability in 2022/23, it is indisputable that local industrial action will have inflated figures during the reference period. Despite this, MF&RS still suffered less than 1% appliance unavailability due to short notice staffing abstractions.

As an important aside to this point, we would draw the reader's attention to the

'NATIONAL JOINT COUNCIL FOR LOCAL AUTHORITY FIRE AND RESCUE SERVICES Scheme of Conditions of Service Sixth Edition 2004 (updated 2009)'

which states: ***'Pre-arranged overtime will not be used to make up any planned shortfall in the overall staffing levels set out in the fire and rescue authority's Integrated Risk Management Plan'***.

MF&RS inability to staff all stations to the level set out in the previous Integrated Risk Management Plan, without the use of pre-arranged overtime due to industrial action, indicates a reliance on overtime in direct contravention to the stipulations set out in the 'Grey Book'.

Before continuing with the proposal and our opposition to crewing fire appliances with three, we would draw the reader's attention to another statement made by MF&RS within the draft CRMP, that statement is as follows:

'We crew our fire appliances with five firefighters at our key stations'

It is the view of the FBU that the above statement is unequivocal in its intent and as such can be interpreted in no other way by members of the public, councillors, politicians, firefighters and indeed all interested parties, that MF&RS crew's appliances at key station locations with five firefighters.

Having been made aware of potential proposals to ride 3 on frontline fire appliances, the FBU began collecting data pertaining to the number of times appliances at key stations in MF&RS were crewed with five firefighters, as detailed in the CRMP.

The FBU collected data across all key station locations from 5th February 2024 - 20th May 2024. That data highlighted the fact that far from crewing appliances on key station locations with five riders on all occasions, MF&RS failed to meet their own target by a considerable margin. From 5th February - 20th May 2024, MF&RS crewed appliances on key stations with five firefighters on less than 62% of occasions, with

one key station falling short of 50% of occasions and others barely passing the 50% mark.

In short, in the same way figures arrived at for short notice appliance unavailability during 2022/23 will be tainted due to local industrial action, those figures will also include occasions when key station locations were being crewed with four firefighters and had to be taken off the run due to short notice staffing abstractions. Had MF&RS met its commitment to crew fire appliances with 'five firefighters' at key stations on those occasions, the appliance would have remained available with four firefighters.

Moving to the proposal itself, MF&RS is seeking to mitigate the effects of short notice staffing abstractions on fire appliance availability, by allowing appliances to be crewed with three firefighters for a limited duration, attending non-life risk incidents only. Under current working practises, MF&RS does not mobilise any frontline fire appliance with less than four crew members. It is the view of MF&RS that by implementing this proposal they will be able to 'maximise appliance availability' for life risk incidents. For clarity, the position of the FBU both locally and nationally is that to provide safe and meaningful intervention, fire appliances should be crewed with five firefighters.

This position was largely influenced by a risk and task analysis of all identified operational scenarios within the fire and rescue service. That analysis set out the minimum safe number of firefighters for a number of known operational scenarios (33 in total). It is referred to as the Critical Attendance Standard, or 'CAST' methodology. This approach examined the phased arrival of crews to any number of incidents types, coupled with the ability of firefighters to carry out standard operating procedures (SOP's) without being placed at increased or unacceptable levels of risk.

For example, one of the most commonly attended categories of incident for the Fire and Rescue Service is dwelling house fire and rescues are regularly and often successfully carried out in such incidents by crews. The risk and task analysis provided within the CAST scenario for such an incident identifies that a minimum of 9 firefighters are required to successfully resolve this type of incident safely. For clarity, the CAST scenarios are wholly based on risk and task analyses undertaken by Government as part of the Pathfinder Review, it is effectively a government scenario replicated and supported by the FBU.

Whilst MF&RS have been clear that it is not their intention to mobilise appliances crewed with three firefighters to life risk incidents, it is reasonably foreseeable that an appliance crewed with three firefighters could become involved in such incidents. Should an appliance crewed with three firefighters be despatched to an incident in error, or arrive on scene to find an incident has escalated beyond their control, firefighters will be placed in a position where they are morally obligated to respond.

As discussed when responding to '*proposal 2*' in MF&RS Draft CRMP, it is vital to both firefighter and public safety that firefighters are not placed in situations which could motivate or pressurise them to act unsafely in the interests of saving life. Put bluntly,

the moral pressure placed on firefighters by members of the public when confronted with a rapidly developing life risk incident may coerce firefighters into responding, regardless of their inability to put in place any agreed safe systems of work.

There is also the possibility, that members of the public may attempt to effect a rescue or tackle an escalating incident themselves due to the perceived inaction of crews. Again, this would place firefighters under immense moral pressure to act and could ultimately lead to further casualties.

The proposal as presented by MF&RS states that it is not the intention for crewing appliances with three firefighters to become common practice or “the norm”. However, FBU members on Merseyside have been given assurances such as these before, when, due to austerity and cuts in funding, minimum crewing levels on frontline fire appliances were reduced from five to four. Again, as highlighted earlier in this response, guarantees made by MF&RS to crew key station appliances with five firefighters are also routinely not being maintained.

As well as the obvious risks posed to firefighters by the proposal to move to three-person crewing, we must also take into account current policy in relation to the use of breathing apparatus. The current MF&RS ‘*Supporting Guidance 6.2.0 Breathing Apparatus*’ states:

‘Breathing Apparatus (BA) must be utilised to provide respiratory protection for firefighters working in oxygen-deficient, toxic or hazardous atmospheres.

BA enables the wearer to breathe safely in irrespirable atmospheres. Its use is one of the risk control measures likely to be utilised within the overall incident plan for incidents involving irrespirable atmospheres, for example, fire and hazardous materials.

This supporting guidance for BA is designed to complement and support MFRS Standard Operational Procedures, where the use of BA as a control measure is defined. BA entry control procedures provide a clear framework within which operational activities can effectively function and be structured around the incident command system. The procedures will enable the adoption of efficient, effective and safe working practices and can be adapted to all sizes and types of incidents requiring the use of BA.’

Both the FBU and MF&RS are in total agreement that (BA) must be used by crews when operating in irrespirable atmospheres i.e. products of combustions. However, as per the current MF&RS guidance for a ‘Single BA Wearer’, use of BA would not be permitted when crewing an appliance with three. The current guidance states:

‘In certain low risk circumstances, it may be appropriate to deploy a single BA wearer to carry out a specific task where respiratory protection is required. The use of a single BA wearer is only permissible when:

- *Operations are not inside a building or structure*
- *Undertaking low-risk activities*

- *The BA wearer's gauge has been checked and their cylinder contents recorded*
- *The wearer's BA tally has been placed in a BA entry control board with suitable and sufficient details entered*
- *The BA wearer can be removed quickly from the risk area*
- *The BA wearer can always be seen by the incident commander or other nominated crew member.*

When utilising a single BA wearer, Stage 1 BA control procedures apply and the BA entry control board will be utilised to record the deployment.'

As highlighted above, the deployment of a single BA wearer currently requires the implementation of 'Stage 1 entry control procedures', something firefighters will be unable to put in place with a crew of only three. In essence, what this means is firefighters will either be unable to don BA whilst crewing an appliance with three, something we are certain MF&RS would agree is totally unacceptable, or, MF&RS would have to alter current policy and guidance, essentially reducing the safety of firefighters, something the FBU believe to be totally unacceptable.

FBU Position and Counter Proposal

It is the view of the FBU that proposals to crew fire appliances with three riders, regardless of duration, or remit are wholly unacceptable and pose a serious risk to firefighters and members of the public alike. Furthermore, MF&RS decision to proceed immediately to proposals of crewing fire appliances with three, despite having made no perceivable, prior attempt to reduce short notice appliance unavailability through other means, is a matter of serious concern to the FBU.

This concern was echoed by many Merseyside FBU members during the recent consultation and survey of FBU members, in which **96%** of members voting indicating they did not support plans to crew fire appliances with three. Furthermore, such was the concern of members that when asked if they would take industrial action should MF&RS seek to impose three-person crewing, **88%** of members voting, indicated they would vote yes in a ballot for industrial action.

As highlighted earlier in this response, in 2023 appliances in MF&RS were unavailable due to short notice staffing abstractions on less than 1% of occasions, a figure we believe can be reduced even further through meaningful collaboration with the FBU. To that end, we are asking that MF&RS cease discussions into three-person crewing in favour of exploring all other possible options to maximise fire appliance availability.

Merseyside Fire and Rescue Service Proposal 4.

Enhancing water rescue capability through introducing either a sub-surface drone or a dive team.

Proposal	Why we are proposing this	Expected benefits
Enhancing water rescue capability through introducing either a sub-surface drone or a dive team	We are the only emergency service that is able to attempt a rescue when people are in the water. We want to increase the chances of saving people in this situation.	We hope we would be able to save the life of someone who has gone on the water more often than we are able to now.

Merseyside Fire Brigades Union (FBU) Response

The FBU are aware of several high-profile incidents nationally and within Merseyside, in which members of the public have sadly lost their lives as a result of getting into difficulties in and around inland watercourses.

As alluded to within MF&RS draft CRMP, at this present time MF&RS has no 'sub-surface' rescue capability should a member of the public become submerged in water. For around 20 years, all firefighters in Merseyside have undertaken still water rescue training and carried out still water rescue operations, with a small cohort also being trained in swift water rescue techniques. Alongside a dedicated Marine Rescue Unit (MRU), firefighters and MRU staff have undoubtedly been responsible for saving countless lives in and around Merseyside.

Moving to the matter of sub surface rescue operations, the FBU have entered into preliminary discussions with MF&RS and whilst we are not unsympathetic to the ask, there are 2 main barriers which must be overcome prior to the continuation of any discussions:

- I. First and foremost, dive team operations clearly fall outside of the agreed role of a firefighter, as such the FBU would expect any team to be contained within the MRU.
- II. As with firefighters, diving operations clearly fall outside of the current remit/role of MRU staff and as such any proposals would require full agreement, not only with the FBU, but more importantly, with all members currently working at the MRU.

Merseyside Fire and Rescue Service Proposal 5

Working with partners to plan for and respond to the emerging threat from fires involving alternative fuels (e.g. Lithium-Ion batteries and Hydrogen fuel cells).

Proposal	Why we are proposing this	Expected benefits
Working with partners to plan for and respond to the emerging threat from fires involving alternative fuels (e.g. Lithium-Ion batteries and Hydrogen fuel cells).	The increased use of Lithium-Ion batteries to power everyday items such as mobile phones, but also vehicles including scooters, bikes and cars, creates challenges for the fire and rescue service and its partners in Merseyside and beyond. The same applies to the use of Hydrogen fuel cells in cars and other vehicles.	Merseyside Fire and Rescue Service and the Local Resilience Forum will work with the industry to help reduce risks for firefighters and the public.

Merseyside Fire Brigades Union (FBU) Response

Merseyside FBU welcome this proposal and the opportunity to work collaboratively with MF&RS to address the risks posed by new and emerging fuel technologies, not only to firefighters, but to members of the public also.

Merseyside Fire and Rescue Service Proposal 6

Introducing Enhanced Mobilisation (pre-alert)

Proposal	Why we are proposing this	Expected benefits
Introducing Enhanced Mobilisation (pre-alert).	We want to respond even faster than we do now. Enhanced mobilisation is a technical change that would alert a crew earlier and put them on standby to attend an incident.	We would arrive at an incident quicker. Potentially up to one minute earlier than we do now.

Merseyside Fire Brigades Union (FBU) Response

In 2023, MF&RS informed the FBU of their intention to purchase and trial software with a view to implementing a pre-alert system in Merseyside. A simplified explanation of this system is that when a 999 call is received by fire control, the software identifies the nearest fire appliance using geographical data obtained from callers' phone, the software then pre-alerts that fire appliance whilst fire control finish collecting data/providing advice to the caller.

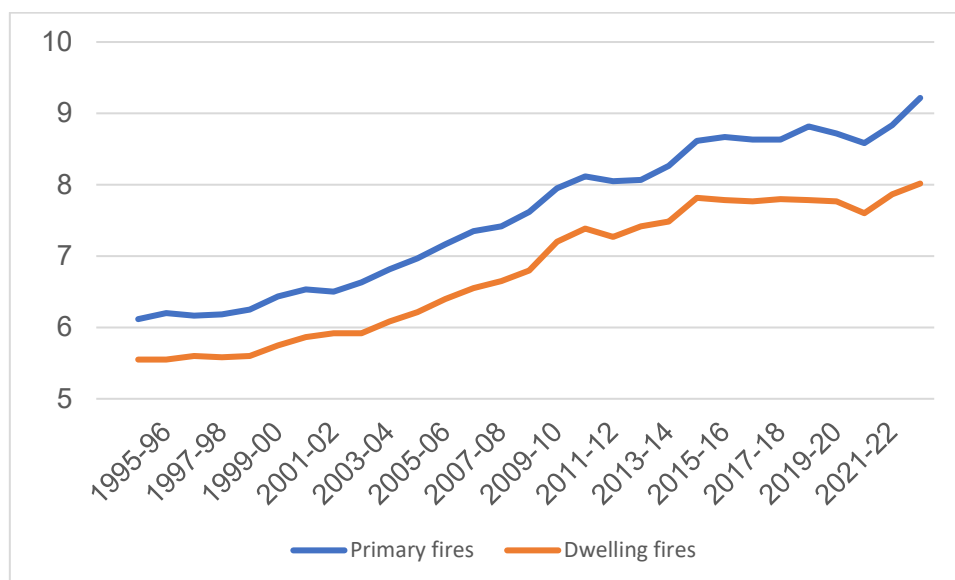
It is the belief of MF&RS that by pre-alerting crews to an incoming call, whilst members in fire control finish collecting data/providing advice to the caller, could potentially reduce attendance at an emergency incident by up to 1 minute. If this claim is realised, it could go some way to addressing the increase in attendance times that has occurred across UK fire and rescue services due to government cuts and the removal of national response standards.

In England, response times for all primary fires (potentially more serious fires that harm people or cause damage to property) slowed by three minutes, from 6.11 minutes in 1994-95 to 9.13 minutes in 2022-23.

Response times to dwelling fires have slowed from 5.33 minutes to 8.01 minutes over the same period and whilst Merseyside have managed to maintain and, in some cases, reduce attendance times, we are still undoubtedly slower than we were 20 years ago.

The graph below compares the attendance of the first fire appliance at a dwelling fire, in England, from that in 1994-95 to 2022-23, the increase in overall attendance times at dwelling fires in England is plain to see.

First appliance response times in England, 1994-95 to 2022-23



The current system also does not record the arrival of **second or other appliances** to an incident. There is now a postcode lottery of attendance standards, meaning a slower response to emergencies than our communities are entitled to expect and firefighters want to deliver.

The FBU are aware of a number of pre-alert systems currently being utilised in UK fire and rescue services with varying degrees of success. For example, we are aware that Greater Manchester Fire and Rescue Service (GMF&RS) operated a pre-alert system for a number of years, but following numerous issues it was removed from all locations other than (GMF&RS) Grey book compliant Day Crewing stations.

In preliminary discussions with MF&RS, the FBU raised concerns in relation to pre-alerts and problems that have been encountered in other fire and rescue services. Following those discussions, MF&RS has provided assurances similar issues will not be experienced with the pre-alert system MF&RS have chosen to adopt. The FBU are willing to work collaboratively with MF&RS to undertake a pre-alert trial, on the proviso that all data pertaining to the trial is shared with the FBU and that any issues arising are addressed to the satisfaction of our members prior to any expansion of that trial.

Merseyside Fire and Rescue Service Proposal 7

Using improved technology in the MFRS Control Room, such as 'Aura', and '999Eye'.

Proposal	Why we are proposing this	Expected benefits
Using improved technology in the MFRS Control Room, such as 'Aura', and '999Eye'.	We currently move fire engines around when those on our key stations are out at an incident. The Aura software will help us map exactly where all appliances are at all times.	This would help cut down on the movement of fire engines between fire stations, allowing them to respond to incidents and do more community work in their own station area.

Merseyside Fire Brigades Union (FBU) Response

Almost every incident the fire and rescue service deals with begins with our members in fire control. They receive the call, extract the vital information from injured, distressed and trapped members of the public. They allocate and mobilise vital resources, assist in resolving every incident and ultimately ensure operational crews return to station safely.

With this in mind, the FBU welcomes the opportunity to work collaboratively with MF&RS in identifying new and emerging technology which may ultimately assist in the pursuit of our members vital duties. However, there are two important caveats to this support:

- I. As part of the settlement for pay for 2022 and 2023, the national fire service employers agreed to undertake a job evaluation of the role of Firefighters (Control) to assess whether there should be an alteration to the pay gap between Control Specific roles and Firefighting roles under the current Grey Book arrangements. Job evaluation is a mechanism to assess different jobs, specifically to address and avoid any issues of prejudice or discrimination. The last such job evaluation was undertaken during negotiations for the settlement of the pay dispute in 2002/03. It was that job evaluation which was the basis for narrowing the gap between the two rates of pay at that time.

Whilst a recent job evaluation did not yield the desired outcome for our members in fire control, we are aware that the agreed, fire control specific role maps have not been updated since 2003 and as such may not be reflective of the actual breadth of work undertaken by our members in fire control. With this in mind, further national discussions will take place over the coming months to identify what work is currently undertaken with a view to making the case for pay which takes account of changes over the past two decades. In light of this, the FBU require assurances that the local implementation of new control room technology will not undermine the case for pay parity between operational firefighters and firefighters (control).

- II. It is a sad but irrefutable fact, that at some point in the career of almost all operational firefighters, they will be subjected to scenes of a harrowing and often incredibly unpleasant nature. Whilst this is not something any firefighter wishes to be subjected to; it is something that for most, is unavoidable and accepted upon commencement of the role of a firefighter, the same cannot be said about firefighters (control). The adoption of technology such as '999Eye', will on occasion, take members out of fire control and place them at the incident ground through the lens of camera phone. Whilst our members in fire control have always had to deal with the aural consequences of a myriad of emergency situations, they have never been confronted with the visual effects experienced by operational firefighters on the incident ground.

As such, the FBU believe careful consideration must be given to the introduction of any new technology which has the potential to have an adverse effect on the mental health and well-being of our members in fire control. Furthermore, in anticipation of the introduction of new technology, MF&RS should review the suitability of the current mental health provision and training that is currently in place for members in fire control.

Merseyside Fire and Rescue Service Proposal 8

Using Watch Managers to carry out different duties that add value whilst responding to incidents in different ways.

Proposal	Why we are proposing this	Expected benefits
Using Watch Managers to carry out different duties that add value whilst responding to incidents in different ways.	We don't think that Watch Managers need to be based on station all the time. They could carry out different duties that add value to the organisation and respond to incidents in a different way	This could provide more resources in areas that are sometimes stretched, such as Protection (fire safety).

Merseyside Fire Brigades Union (FBU) Response

As previously stated, during the consultation period, Merseyside FBU conducted a member consultation and survey to gauge support for proposals contained within the CRMP. In relation to the proposal to use Watch Managers (WM's) differently, we received survey responses from **84** (WM's), of those that responded, **94%** stated they did not agree with removing (WM's) from frontline fire appliances to undertake other duties. The position of the vast majority of our officer members is that if they wished to undertake other activities, they would apply to work within a day related post or they would enter the promotion process for Station Manager (SM). What is clear to the FBU from discussions with WM members, is that the vast majority of station-based watch managers wish to remain on the fire appliance.

Furthermore, having had the opportunity to speak to other services that have introduced similar working practices and, in some cases, implemented and withdrawn such practices, we have uncovered the following issues;

- I. A reduction in the overall number of WM posts.
- II. Issues with management of Crew Manager (CM) and WM leave.
- III. A reduction in promotion opportunities from CM to WM.
- IV. An increase in CM's leaving services to seek promotion in other services, due the reduction in upwards mobility.
- V. Increased levels of road risk, coupled with the cost and time of training WM's to respond in blue light vehicles, which must also be purchased.
- VI. Instances of WM's arriving at scene in cars before the arrival of fire appliances.

In the view of the FBU, this proposal drastically reduces levels of supervision and experience on fire appliances and undercuts nationally agreed rates of pay and job roles. For these reasons the FBU are unable to support this proposal.

Merseyside Fire and Rescue Service Proposal 9

Working in areas of higher risk to educate and inform the communities in those areas about known and foreseeable risk (e.g., flooding and wildfire) and the actions they can take to make themselves safer.

Proposal	Why we are proposing this	Expected benefits
Working in areas of higher risk to educate and inform the communities in those areas about known and foreseeable risk (e.g., flooding and wildfire) and the actions they can take to make themselves safer.	We'd like to do even more to help our communities understand the risks in the areas they live in and what they can do to help themselves deal with those risks - e.g. in areas of flood risk	People living in specific communities would be more informed and better prepared for events that might affect them

Merseyside Fire Brigades Union (FBU) Response

Whether or not successive governments or world leaders are willing to accept it, the climate is changing. The Met Office confirmed 2022 was the UK's hottest year on record and the top ten highest annual temperatures ever recorded, have occurred in the last two decades.

All areas of the UK are projected to become warmer with hot summers like 2022 becoming even more common by the middle of this century. In the future, with further high emissions, the frequency of hot spells increases, as does the intensity of heavy summer rainfall events.

The Westminster government's first Climate Change Risk Assessment (CCRA) in 2012 recognised that "There would be added burdens on our emergency services in responding to more frequent flooding, heatwaves and wildfires." The latest CCRA 2022 lists floods and wildfires in a number of risks assessed as "more action needed" at a UK-wide level.

The Westminster government's second National Adaptation Programme (2018) demanded: "Emergency services and local resilience capability take account of and are resilient to, a changing climate." This has not translated into funding the fire and rescue service sufficiently to meet these challenges.

Recently, the UK has experienced significant wildfire incidents, bringing an increased risk to homes, infrastructure and agriculture. These wildfires increasingly occur at the "rural-urban interface", where countryside meets residential areas.

On 19 July 2022, fifteen fire and rescue services declared major incidents due to wildfire. The London Fire Brigade (LFB) took 2,500 calls and tackled a thousand incidents - probably its busiest day since World War II. Yet on the day, 39 appliances were out of action - there were not enough firefighters to crew these fire engines.

Similarly, firefighters have also had to intervene in a wide range of flooding incidents in recent years, notably in summer 2007, 2012 and in the winters of 2013-14, 2015-16 and 2019-20.

The Climate Change Risk Assessment 2022 estimates that just under 1.9 million people across all areas of the UK, are exposed to frequent flooding.

Annual damages from flooding for non-residential properties across the UK is expected to increase by 27% by 2050 and 40% by 2080.

The FBU has campaigned for a legal duty to be placed on all fire and rescue authorities across the UK to tackle major flooding and wants the resources to match it from central funding. There is currently a legal duty for fire and rescue services to respond to major floods in Scotland, Northern Ireland and Wales - but not in England.

Merseyside FBU are happy to work in collaboration with MF&RS on this proposal, with the caveat being that MF&RS commit to the joint lobbying of any incoming government for a statutory duty and funding, for flood response in England.

Merseyside Fire and Rescue Service Proposal 10

Continuing to assist the Ambulance Service in relation to cardiac response and expanding this to people who have had falls.

Proposal	Why we are proposing this	Expected benefits
Continuing to assist the Ambulance Service in relation to cardiac response and expanding this to people who have had falls.	We believe we can support (not replace) the ambulance service when people have cardiac arrests or falls	We can help save more lives and improve quality of life by supporting North West Ambulance Service.

Merseyside Fire Brigades Union (FBU) Response

Emergency medical response was introduced at three MF&RS stations in February 2016 as part of national trials conducted under the auspices of the National Joint Council. Those trials ceased on Monday 18th September 2017, following a failure to agree between the FBU and national fire service employers.

The trial which took place in MF&RS was confined to assisting Northwest Ambulance Service (NWS) with category 1 calls, namely cardiac arrest. Having now had several years to interrogate the data from other services, it is without a doubt that the trial run in MF&RS was amongst the best in the UK. This was in no small part due to the willingness to collaborate shown by the FBU, MF&RS and NWS when agreeing a memorandum of understanding (MOU) which set the parameters for the trial.

It remains the position of Merseyside FBU that should emergency medical response be reintroduced, it must be done so through agreement with the FBU both locally and nationally, and must be confined to assisting NWS with cardiac arrest.

Merseyside Fire and Rescue Service Proposal 11

Targeting Prevention work toward those most likely to die in a fire and the areas of highest deprivation.

Proposal	Why we are proposing this	Expected benefits
Targeting Prevention work toward those most likely to die in a fire and the areas of highest deprivation	Already an important part of what we do; more data shared by other organisations will help us target our prevention services even more accurately. We also know that people in sheltered accommodation are at higher risk, so we want to do even more to protect them.	We will keep more people safer because we know more about the risks they face and we can target our interventions to reflect that risk better. People living in sheltered accommodation would be safer as a result of this work

Merseyside Fire Brigades Union (FBU) Response

Whilst being home to rich and diverse communities, Merseyside is also home to some of the highest levels of social deprivation in the UK. Firefighters in Merseyside regularly make meaningful and in some cases lifesaving intervention into the lives of Merseyside residents through community engagement and fire safety work. Our members are able to undertake this work because they are respected by the communities they serve.

The FBU are willing to work collaboratively with MF&RS on all aspects of this proposal to ensure that our joint efforts are focused on safeguarding those within our communities who are at the greatest risk and most in need of our support.

Merseyside Fire and Rescue Service Proposal 12

Following the introduction of a national Building Safety Regulator to address the legal changes following the Grenfell Tower incident, we will introduce a new framework for fire safety related enforcements and prosecutions to improve public safety

Proposal	Why we are proposing this	Expected benefits
Following the introduction of a national Building Safety Regulator to address the legal changes following the Grenfell Tower incident, we will introduce a new framework for fire safety related enforcements and prosecutions to improve public safety	We've already done a lot to support the implementation of Grenfell Tower Inquiry recommendations and these next steps will help us to improve safety even more	Residents of high rise and other high-risk buildings will be safer from fire.

Merseyside Fire Brigades Union (FBU) Response

The FBU have played a pivotal role in both the Grenfell Tower inquiry and the fight for justice for all those who lost their lives as a result of the tragic occurrences of 14th June 2017.

We will continue to support the implementation of the Grenfell Tower Inquiry recommendations and are willing to work collaboratively with MF&RS on all aspects to ensure the safety of Merseyside residents.

Merseyside Fire and Rescue Service Proposal 13

Using the new Training and Development Academy for national and international training.

Proposal	Why we are proposing this	Expected benefits
Using the new Training and Development Academy for national and international training.	Our investment in our new Training and Development Academy can benefit the UK and international fire and rescue services	MFRS can provide national training and assurance in relation to the National Resilience capabilities through its enhanced training facilities - demonstrating best practice

Merseyside Fire Brigades Union (FBU) Response

The FBU welcome the opening of the new training and development academy and the improved training possibilities that will now hopefully be realised for our members.

It's important to remember that to provide the very best training, MF&RS needs to engage and retain the very best people to undertake those training roles. Our members are undoubtedly amongst the very best fire service trainers in the UK, something we believe must be reflected in the terms and conditions of those working at the new training and development academy.

Merseyside Fire and Rescue Service Proposal 14

As lead authority for National Resilience, we will work with the Home Office on the programme to refresh the current National Resilience assets (known as New Dimension 2).

Proposal	Why we are proposing this	Expected benefits
As lead authority for National Resilience, we will work with the Home Office on the programme to refresh the current National Resilience assets (known as New Dimension 2).	The New Dimension programme funds the equipment and training requirements which make sure England's fire and rescue services can call on specialist capabilities to help them deal with a wide range of large or national-scale incidents	The programme is designed to ensure that fire and rescue services are able to save as many lives and protect as much property as possible through the quick deployment of the specifically designed capabilities.

Merseyside Fire Brigades Union (FBU) Response

The FBU supports this proposal and are happy to work collaboratively with MF&RS in this regard.

Merseyside Fire and Rescue Service Proposal 15

Achieving Net Zero by 2040

Proposal	Why we are proposing this	Expected benefits
Achieving Net Zero by 2040	We are keen to play our part in reducing carbon emissions in the ways we build and maintain our fire stations and other buildings, how our staff travel and the equipment they use to deliver our services.	Although this proposal would continue several years after the end of this plan, we know we have to make changes now.

Merseyside Fire Brigades Union (FBU) Response

The FBU have reservations over the achievability of this proposal. However, we are happy to work collaboratively with MF&RS in an attempt to realise Net Zero by 2040.

Conclusion

There is a great deal the FBU can, and do support within the 2024 - 2027 draft CRMP. What we are unable to support, is any proposal that has the potential to place firefighters and/or members of the public at an increased level of risk.

One of the main pillars MF&RS core values is, 'We serve with Compassion, by actively listening - hearing what is being said,' and it is by this core value we would ask MF&RS to consider the opinions provided by professional firefighters in relation to the proposals contained within the draft CRMP. The fact that certain working practises are in place in other services does not necessarily mean they are best practise, nor does it mean they are suitable for use within MF&RS.

We must continue to strive to provide the very best service for the people of Merseyside, whilst simultaneously ensuring the safety and well-being of each and every member of staff who make up MF&RS.

As stated previously, the FBU believe that collaboration is vital and that by listening to and engaging with firefighters and the FBU, we can ensure our service continues to thrive, not just for the length of the CRMP, but long into the future.