



2013

Fire Brigades Unions' Preliminary Observations - Draft Integrated Risk Management Plan - Merseyside Fire and Rescue Service June 2013



Merseyside Fire Brigades Union
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Foreword

The Fire Brigades Union welcomes and fully supports the principle of a risk based approach to Fire Service Emergency Cover (FSEC) and indeed have previously endorsed this approach into FBU Conference Policy.

The Fire Brigades Union represent the overwhelming majority of uniformed employees of Merseyside Fire and Rescue Service. We offer this document as part of the required consultation process with representative bodies. This document has been compiled utilising the vast wealth of expertise, knowledge and experience of those personnel who provide the emergency response and other vital services to the people of Merseyside.

The key principle of a risk based approach to Fire Service Emergency Cover (FSEC) is the introduction of the **Integrated Risk Management Plan** (IRMP) which all Fire and Rescue Authorities are required to undertake.

The stated aims of this approach, as laid out by Government, is to produce IRMP's that improve public safety and consequently improve Fire and Rescue Services by reducing deaths, injuries and other consequences of fire and other emergencies such as Road Traffic Collisions (RTC's). This is set out in the Governments Guidance Note 1 to IRMP's at paragraph 1.2, in that:

'The government thinks that a modern and effective fire and rescue service should serve all sections of our society fairly and equitably by;

- *reducing the number of fires and other emergency incidents occurring;*
- *reducing loss of life in fires and other emergency incidents;*
- *reducing the number and severity of injuries occurring in fires and other emergencies;*
- *reduce the commercial, economic and social impact of fires and other emergency incidents;*
- *safeguarding the environment and heritage (both built and natural); and*
- *providing communities with value for money.'*

IRMP's are plans for determining future Fire and Rescue Service activity aimed at keeping people safe from fire using a 'risk-based' approach which is built on the pillars of Intervention (Emergency Cover), Prevention (Community Fire Safety) and Protection (Legislative Fire Safety) activity as follows:

- Prevention: Stop fires before they start (education) and give early warning of fires if they do (e.g. smoke detectors) coupled with fire escape plans (what to do if a fire starts in your home to maximise your chances of escape/rescue). Merseyside Fire and Rescue Service offer this to each resident, free of charge, through the practice of operational firefighters and designated community fire safety officers undertaking Home Fire Safety Check (HFSC's).
- Protection - (in buildings covered by Fire Safety Legislation) - stop fires before they start, give early



warning of fire through automatic fire detection (AFD) equipment, and limit fire spread through building design and building management so that people can get out safely if a fire does start.

- Intervention - have sufficient emergency resources (firefighters/ emergency fire control operators / fire engines etc.) available to deal with fires (and other emergencies) when they do occur.

The provision to some Merseyside residents of free smoke detectors and to others of the fitting of smoke detectors provides all Merseyside

community members the real opportunity for early detection and escape from death and injury in the event of fire.

With early detection must come swift intervention, and consequently with earlier detection must come swifter intervention.

A real potential to save more lives

L Skarratts
Brigade Secretary

M Rowe
Brigade Chair

For and on behalf of the Merseyside FBU Brigade Committee



Executive Summary

Merseyside Fire Brigades Union have found much to agree with in the Fire and Rescue Authority's Integrated Risk Management Plan for 2013 - 16.

This Union has always been at the forefront in campaigning for improvements to the Service which over the years have saved many lives both of the public and firefighters. However the Fire Brigades Union reject wholly the concept of cost as the main driver for change.

The FBU warns the reader that firefighter deaths are at an all time high, this is unacceptable and steps must be taken to ensure those deaths cease with immediate effect.

The FBU believes that the consequences of the fiercest attack against the Fire and Rescue Service by a Coalition Government intent on slashing away at public services, and the Fire and Rescue Service in particular by reducing budget provision to a dangerously low level, places firefighters and community members at peril and that cannot be allowed to continue.

The FBU supports the MF&RA Chairs comments in that Cllr Dave Hanratty says *'The Government is now indicating further significant grant reductions over the next two years which will mean station closures, fewer firefighters and fewer fire appliances. It is the vulnerable and poor who will be most affected and most at risk from any further cuts in our funding.'*

The FBU also supports Chief Fire Officer Dan Stephens's comments

when he stated that *'The grant cut will lead to more fires, fire deaths and injuries on Merseyside. Reductions in stations, appliances and firefighters will have a significant impact on our frontline emergency response and prevention work'*

Of course part of the context of the attacks against the Fire and Rescue Service is the self serving and sycophantic report from Sir Ken Knight which attempts to bludgeon the concept of decent public services into submission by the lie that cheaper is better.

There is little of worth and note that stems from the report which serves only to justify the devastating attacks on the Fire and Rescue Service and set up more attacks in the future such as the call for a review of the National Conditions of Service, the Grey Book.

Knight calls for a number of things, cheaper conditions, cheaper wage bills, cheaper departments – yet ignores the real issues of the day such as slower response times and higher firefighter fatalities. The test is not always profit (or cheaper, lesser services).

Sadly, MF&RS have for a number of years been at the forefront of the dash to cut jobs, trial daft ideas such as Firebikes, Small Fires Units etc and employ firefighters on Victorian duty systems, working our members for 96 hours a week on the infamous LLAR system, and all for nothing as Sir Ken Knight lumps all Fire and Rescue Services together in an anonymous criticism of the entire Industry. Year on year of cuts within



MF&RS completely disregarded in a so called efficiencies review. The FBU derive no pleasure from pointing this outrage out but remind elected members and readers this is exactly what we feared would happen.

Sir Ken Knight points out that although fires have reduced by 40% firefighter numbers have only reduced by 6%, MF&RS has almost halved the numbers of operational firefighters in the last 10 years, by far outstripping all other F&RS's in the race to the bottom.

“While casualties and fatalities have fallen continually, and fires, after peaking in 2003, have fallen dramatically, expenditure has actually risen and has only in recent years declined. Firefighter numbers, however, have remained relatively stable over the period only reducing by 6 per cent in the last 10 years.” Sir Ken Knight.

Sir Ken Knight does reveal a number of issues that the FBU does have concerns about though, such as the misguided and ill judged decision to move to provide 7 PFI stations within Merseyside. Whilst the FBU accept this is the legacy of a previous principal management team, the decision will haunt MF&RS for many, many years to come.

It is accepted by some that there may in future years be such a sustained attack on the Fire and Rescue service that there may have

to be a contemplation of the closure of a fire station. Given that MF&RS have effectively privatized in the region of a quarter of the fire stations it seems reasonable to assume only the publicly owned fire station would come under threat. Given that a number of PFI stations protect what the Authority has

deemed to be of low activity and risk it would also be safe to assume that those stations would normally be considered for closure ahead of busier fire stations. The FBU have continually condemned the PFI initiative within MF&RS as to privatise those stations means

that the Authority could only look at the possibility of closing publicly owned busier stations meaning potentially stripping fire cover from our more vulnerable areas, a fact that is simply unacceptable and short sighted in the extreme.

The FBU also agree with Knight in his criticism of the F&RS's budget reserve strategy, in that tying up public money in futile budget reserve strategies whilst frontline services are being systematically annihilated is unforgivable.



INTRODUCTION

Government have produced and provided a number of Guidance Notes for Fire and Rescue Authorities to comply with in their compilation of Integrated Risk Management Plans (IRMP's) and whilst it has been very difficult to assess and mitigate the risk to the communities of Merseyside, along with the firefighters employed within MF&RS, as a consequence of the massive budget cuts there remains a responsibility of the Authority and its operational wing 'the Service' to do just that.

With the latest round of swingeing cuts announced and the fall out being another £10 million slashed from the budget of MF&RS, this introduction attempts to analyse where the Service is at this moment in time compared to other Fire and Rescue Services (FRS's).

We also attempt to bring a degree of candour to the debate; if we are to weather this particular storm the FBU firmly believes that we all have to be honest about all issues.

The information contained within this report is gathered only from official data sources and are mainly either MF&RS figures or CLG figures.

The FBU constantly observes Government Ministers, MP's, elected members and Service managers stating that MF&RS is innovative and the manner in which local efficiencies have been introduced and community safety initiatives delivered, such as the provision of free smoke detectors have driven down numbers of fires and injuries.

The inference being that we are lucky to have had the innovative management of the past and the initiatives over the years as we are significantly ahead of the rest of the country in terms of performance. We are an 'Excellent Authority' we are constantly reminded.

This section seeks to investigate if that is indeed the case.

How Many Home Fire Safety Checks (HFSC's) Has MF&RS Carried Out in Recent Years?

It has been reported that MF&RS has carried out over one million home fire safety checks and the Fire Brigades Union do not dispute those figures. The figures are particularly interesting in this area of fire and rescue service activity.

It has often been stated that it is MF&RS's innovative activity in this field that has brought the amount of fire calls, injuries and deaths down over the years. The Fire Brigades Union makes it very clear from the outset that we support the provision of home fire safety checks and community fire safety advice to community members and businesses; it is the reliance on unchallenged statements such as this which deeply worries the FBU.

The Fire Brigades Union appears to be the only organisation that has the courage to analyse the difficult issue of home fire safety checks, we have come to the conclusion within Merseyside Fire Brigades Union that as a direct result of the massive Government cuts to MF&RS budget the provision of free smoke detectors should cease, to concentrate all resources to frontline life saving services.





The key figures are as follows:

Table 1

Home Fire Risk Checks (HFSC) carried out by fire and rescue services in England			
Fire & Rescue Service	2011-12	2010-11	2009-10
Merseyside	71,972	70,477	106,172
GMC	67,091	55,115	48,310
South Yorkshire	24,985	35,634	17,541
Tyne and Wear	30,004	30,153	22,299
West Mids	33,592	40,908	41,125
West Yorkshire	65,664	63,010	64,531
London	77,378	70,016	64,749
Lancashire	46,284	54,680	50,438
Cumbria	10,041	18,175	14,950
Cheshire	27,017	62,707	62,321

The above table (Table 1) confirms that it is evident that MF&RS have carried more HFSC's and fitted more smoke detectors than any other fire and rescue service and have been doing it significantly longer than all other fire and rescue services.

In a recent Merseyside Fire and Rescue Authority Report (CFO/045/12) it is reported that ***'since 1999, MFRS has proactively promoted community fire safety by conducting over 715,000 Home Fire Safety Checks resulting in a 44% reduction in Accidental Dwelling Fires during this period. More importantly, there has been a reduction in the number of people killed (67%) or injured (28%) through fire in the home.'***

Further, MF&RS declares it has provided and fitted over 1 million free smoke detectors as part of this initiative, but has it genuinely resulted in a 44% reduction in accidental dwelling fires since 1999, as is alleged or are there other factors that have played their part in that reduction?

If we look, not just at the number of dwelling fires but at all fires, including chimney fires,

for the last ten years (2001/02 to 2011/12) and given the number of HFSC's and free smoke detectors provided and fitted by MF&RS firefighters in contrast to most if not all other fire and rescue authorities, it should be the case then that if there is a direct correlation to HFSC/detector provision, MF&RS figures would be outperforming the next nearest fire and rescue service, and all other F&RS's, by a significant margin.

In the last ten years there has been a steady but distinct reduction in the number of all fires in England with a 48% drop in the number of all fires in that time period. It was a slightly greater reduction in the metropolitan fire and rescue services with a 51% drop in all fires in that period.

While MF&RS performed well in this area with a 57% reduction in all fires between 2001/02 to 2011/12, it was not the highest performer, as would be expected given the bold statements in relation to smoke detector provision; Avon reported a 60% reduction, Cheshire a 59% reduction and Humberside 58%.



Reduction in the numbers of all fires, including chimney fires, by fire and rescue service, 2001/02 - 2011/12

(These tables are published alongside and as part of its associated edition of 'Fire Statistics Monitor'
<http://www.communities.gov.uk/fire/researchandstatistics/firestatistics/firestatisticsmonitors/>)

Table 2

ENGLAND	48%		
ENGLAND (Non Met)	46%		
Avon	60%	Norfolk	36%
Bedfordshire	40%	North Yorkshire	39%
Berkshire	53%	Northamptonshire	51%
Buckinghamshire	50%	Northumberland	41%
Cambridgeshire	41%	Nottinghamshire	46%
Cheshire	59%	Oxfordshire	40%
Cleveland	56%	Shropshire	35%
Cornwall	33%	Staffordshire	31%
Cumbria	50%	Suffolk	30%
Derbyshire	34%	Surrey	33%
Dorset	51%	Warwickshire	31%
Durham	45%	West Sussex	35%
East Sussex	50%	Wiltshire	33%
Essex	46%	Isles of Scilly	47%
Gloucestershire	34%		
Hampshire	52%	ENGLAND (Met Counties)	51%
Hereford & Worcester	34%	Greater Manchester	55%
Hertfordshire	45%	Merseyside	57%
Humberside	58%	South Yorkshire	40%
Isle of Wight	49%	Tyne & Wear	55%
Kent	47%	West Midlands	41%
Lancashire	53%	West Yorkshire	54%
Leicestershire	46%	Greater London	51%
Lincolnshire	24%		

The data above (Table 2) provided by Communities and Local Government (CLG) indicates that all fire and rescue services saw a significant reduction in activity in the ten year period with no obvious correlation with HFSC or provision of smoke detector.

But of course the table above includes all fires including car fires and fires in open ground (such as rubbish fires etc) which would not attract HFSC's or smoke detectors, so we should look at the data that looks specifically at those fires which occur in dwellings such as houses.

Have the Number of Emergency Incidents Dropped As A Result of the HFSC's?

The CLG figures identifies that in the last 10 years the numbers of primary fires in dwellings within Merseyside dropped by 46%, proof then that mass provision of smoke detectors and HFSC's did actually drive down the numbers of primary fires.....unless you look at the evidence in more detail.

In the same 10 year period, other fire and rescue services who hadn't shared the same passion for HFSC's and provision of free smoke detectors, performed as well and in some cases even better than MF&RS.

GMC reduced their primary fires by 43%, South Yorkshire by 45%, West Yorkshire 41%,



West Mids 47% and Tyne and Wear by an impressive 68%.

Our neighbours reduced their primary fires as significantly as MF&RS with Lancs reducing primary fires by 41%, Cheshire by 47% and Cumbria by 51%.

Unless our neighbours equalled our commitment and resource provision of HFSC and free smoke detector provision, then that fatally undermines the mantra that HFSC's and detectors have driven down fires.

You will not be surprised to learn that those fire and rescue services trailed MF&RS by some considerable margin in terms of HFSC's and free smoke detector provision.

More recently the figures become more relevant and more revealing. In the last three years the numbers of primary fires had reduced within MF&RS by only **9%**, which compared to GMC's **7%** reduction, South Yorks **15%** reduction and Tyne and Wears **21%** reduction confirms the Fire Brigade Unions concerns. For completeness, our neighbours performance was that Lancs reduced primary fires by **12%**, Cheshire by **7%** and Cumbria by **6.5%**.

To dispel any doubt, in the last 12 months, primary fires have regrettably increased by 3% within MF&RS but in GMC they dropped by 2%, in South Yorks they dropped by 11%, in Tyne and Wear they dropped by 12%, West Mids by 7%, West Yorks by 2% and in Greater London by 1%. Similar our neighbours in Lancs have seen a 5% drop in primary fires, Cumbria 1% and 6% in Cheshire.

So has the MF&RS CFS initiative driven down fires, in dwellings and elsewhere, the data is clear in that it has not.

That is not to say that it is not an important initiative but the FBU is clear in that those whom trot out the mantra that HFSC's and smoke detectors are the reason for the reduction of fires are wrong and the FBU's worry is that they are catastrophically wrong

as many in decision making positions such as Fire Authority members have set budgets and fire cover in what we believe to be the false knowledge that we are better protected from fire as a result of HFSC's and smoke detectors when that is evidently not the case.

But You Would Say That Wouldn't You?

If the data is not evidence enough the FBU remind the reader of the thoughts of the National Audit Commission. In the National Audit Commission report presented to the members of the Local Government Associations (LGA) fire services forum, 10th October 2008, the commission stated that **'Some FRSs have delivered far more Home Fire Safety Checks than others HFSCs delivered, Oct 04 to Mar 07, as a % of domestic properties, by FRS... but there is no clear link to reductions in accidental fires in the home'**.

Further, the Audit Commission made the statement that **'The effectiveness of HFSC programmes is likely to be driven by targeting more than overall numbers'**.

There are very difficult decisions to be made in the fire and rescue services in the near future foisted on the service by the disgraceful ConDem Government, the FBU insist those decisions are made on truthful and evidence based premises.

Those that say, or have said that MF&RS have driven down fires solely as a result of the provision of smoke detectors do the fire and rescue service and the people of Merseyside a disservice.

Aren't We All In This Together Though and Cuts Are Fairly Distributed?

It is also important to put into context the number of firefighting personnel and others employed by Merseyside Fire and Rescue Authority over the same period.



In 2001 MF&RA employed 1,391 operational firefighters, 54 emergency fire control room operators and 229 non uniformed staff.

From 2001 to now there has been a significant and consistent loss of operational firefighters and control room staff within Merseyside Fire and Rescue Service, the following table reveals the true picture.

Numbers of Staff Employed by MF&RS.

Table 3

Year	Operational Staff	Control Room Staff	Non-uniformed Staff
2002	1391	54	229
2003	1361	54	216
2004	1319	58	255
2005	1249	50	330
2006	1148	55	355
2007	1105	49	406
2008	1044	44	405
2009	990	42	403
2010	923	42	409
2011	885	42	407
2012	824	32	383

ODPM/CLG Fire Statistic Annual Returns.

The figures in Table 3 demonstrate that there has been a 41% drop in operational staff in the last ten years (disregarding the current proposed job losses for 2013-2015), a 41% drop in emergency fire control room staff but a 67% rise in non-uniformed staff.

The cuts announced for the next two years will result in the loss of a further 90 firefighter jobs and 57 non-uniformed jobs.

That will see the drop in firefighter jobs increased from 41% to 47% since 2002, the most significant drop in any fire and rescue service in the country by a massive number. The numbers in relation to non-uniformed staff, including these years' cuts, would have increased by 42% since 2002. Fire and rescue service priorities must be discussed in a reasonable and responsible manner.

The FBU also note the disingenuous attempt by some, including Knight, to attempt to redefine the definition of 'frontline' to include

a wider range than that which is clearly in the minds of any reasonable person, the court of public opinion is clear on this point in the FBU's view.

What is without question is that MF&RA in conjunction with the Service have become comfortable in deciding to move to firefighter job losses, bending to the will of some before exhausting all options, even the more difficult and contentious ones. The Fire Brigades Union has previously written to the Fire and Rescue Authority laying out our proposals on this issue which have, in the main, been disregarded. The FBU stills presses the Authority to look more forensically at every quarter of the Service such as bringing back in house services the Authority have previously agreed to outsource such as IT etc.

The FBU is further reminded of the words of the previous Chief Fire Officer whom said in 2006 that ***'The underpinning for all the proposed changes is that the Government in***



its assessment of our grant is effectively saying that given Merseyside's population and risk factors they expect us to cost less. That must mean a reduction of staff in all areas of the service. In all areas (uniformed, control room and non-uniformed) Merseyside has very high numbers of staff per head of population compared to other authorities.' (MF&RS Report CFO/155/06 – Appendix A)

The FBU at this point reminds the reader of our consistent message in that we do not, or ever will, pitch job against job, or worker against worker; we do not urge the cannons to turn more against the non uniformed, nor



What About Reserve Funds?

This has always been a contentious issue with MF&RA, in recent times, never using reserves to properly protect frontline service in such obvious times of need.

Even the CLG Secretary of State, Eric Pickles, no friend of the trade union movement, has stated to authorities in a terse press release that **'An analysis of council funding by the Audit Commission, published today, found that local government reserves totalled £12.9bn at the end of 2011/12, equivalent to almost a third of net spending on services. Reserves increased by £4.5bn between 2007 and 2012.'**

Pickles said: **'People would be surprised that councils are hoarding billions whilst some are pleading poverty.'**

'Given the rise in reserves, it was disappointing and irresponsible that some sections of local government have chosen to needlessly scare the public with unfounded predictions of doom and gloom', he added. **'Whilst local authorities should maintain a healthy cushion, it's time for them to tap into**

the non operational, nor the health worker, the teacher, the council worker, in this we are clear.. we **are** all in this together.

To further illustrate the disproportionality of the present situation, and if we take the Principal Officers pay for this purpose. The Principal Officer Group (2) as a percentage of the operational workforce (824) is 0.24%, that is one quarter of one per cent of the workforce but the wage bill for the Principal Officer Group is 1.5% (£425 000) of the entire wage bill of the operational establishment.

their substantial reserves to ensure they protect frontline services, with a view to building up their reserves again in sunnier days to come.'

Councils should provide greater details on their plans for the reserves, the report said. Although authorities routinely consider the role of reserves in annual budget setting, they should also give councillors clearer and more comprehensive advice on how they could be used.

The report found that between 2007 and 2012, 77% of all councils increased their reserves relative to their spending, although this period included the first year of cuts following the Comprehensive Spending Review in October 2010.

Pickles went further in accusing some councils of scaremongering about funding cuts after it was revealed that some reserves have risen by more than a third in the past 5 years.

If we look at MF&RA's budget strategy and analyse the reserve position 5 years ago we can identify that in 2008/09 the reserve fund stood at **£4.1M**, which was broken down into



a **£2M** general reserve fund and **£2.1M** held in what the authority allows to be called an earmarked reserve fund. Interestingly, the budget forecast agreed in 2008 identified that the forecast position on anticipated reserves for 2013 being exactly the same figure of **£4.1M**.

In identifying the current 2013 position, one can see from Table 4 that the reserves have been built up not just more than a third (33%) that Pickles feared, but by a

Table 4

	31.03.08	31.03.09	31.03.10	31.03.11	31.03.12	31.03.13
	£'000	£'000	£'000	£'000	£'000	£'000
General Reserve	2,000	2,000	2,000	2,000	2,000	2,000
Earmarked Reserves						
Bellwin Reserve	147	147	147	147	147	147
Insurance Reserve	220	220	220	220	220	220
Emergency Planning Reserve	75	75	75	75	75	75
FB Modernisation Reserve	745	745	745	745	745	745
Smoothing Reserve	0	0	0	0	0	0
F/F Games Reserve	63	63	63	63	63	63
Regional Reserve	170	170	170	170	170	170
PFI GAP Reserve	680	680	680	680	680	680
	2,100	2,100	2,100	2,100	2,100	2,100
	4,100	4,100	4,100	4,100	4,100	4,100

http://www.merseyfire.gov.uk/asp/pages/fire_auth/pdf/CFO_052_MF&RA_Budget_and_Financial_Plan_20082009-20122013pdf..pdf

In identifying the current 2013 position, one can see from Table 4 that the reserves have been built up not just more than a third (33%) that Pickles feared, but by a staggering 420%!

MF&RS have persuaded the Authority to agree to the reserves being split into a number of areas and then ring fencing those areas providing a view that the reserves are already being utilised to maximum benefit.

The huge amount of reserves can then be explained away as it being more a revenue (or

revenue protection) fund rather than genuine reserves.

The employer will say things such as the reserves are there to mitigate against compulsory redundancies etc. Whilst it is true that the financial settlement is dire, it is a bit rich when Eric Pickles, the Tory Secretary of State who essentially created this deficit agrees with the trade union in that public money locked in reserves should be used to protect the front line service in the manner the public so obviously would expect.



Forecast Reserves 31.03.13

	Closing Balance
<u>Earmarked Reserves</u>	£'000
Spate / Other Emergencies	
Ill Health Reserve	244
Bellwin Reserve	147
Insurance Reserve	620
Emergency planning Reserve	75
Smoothing Reserve	1,495
Specific Projects	
Regional Reserve	100
Health & Safety Reserve	81
Equipment Reserve	253
Contestable Research Fund	25
Training Reserve	285
PFI Annuity Reserve	590
FSD Reserve	35
Job Evaluation Reserve	230
Healthy Living / Olympic Legacy	61
Severance Reserve	1,812
Inflation Reserve	2,000
Capital Investment Reserve	5,236
	13,289
<u>Ringfenced Reserves</u>	
F.R.E.E. Reserve	35
Princes Trust Reserve	134
Community Youth Team Reserve	54
Beacon Peer Project Reserve	49
Innovation Fund Reserve	144
Regional Control Reserve	18
St Helens District Reserve	8
New Dimensions Reserve	466
	908
<u>Qtr 3 contribution to Reserves</u>	2,500
 Total Earmarked Reserves	16,697
<u>General Fund</u>	4,684
 Total Reserves	21,381



The Merseyside Fire and Rescue Authority Draft Integrated Risk Management Plan (IRMP)

The FBU represents the overwhelming majority of firefighters and fire fighters (control), we are therefore in the unique position of being able to apply a huge wealth of experience and expertise to the issues of fire cover and the development of Merseyside Fire and Rescue Authority's draft IRMP 2013 - 2016. Our members are the front line of the Fire and Rescue Service and we hope that their experience and their knowledge of their profession can assist in the development of Merseyside Fire and Rescue Service.

Accordingly, the FBU offer the following comments to be considered within the consultation process.

1 Introduction

Financial Challenge 2013/14 & 2014/15

The FBU completely agree with the statement from the Authority that MF&RA do not want to make any cuts or changes to Community Fire stations and the Union believes that position has been reached after assessment of risk and which sets the benchmark for the IRMP. It is a source of shame that the Tory led Coalition Government has cut the Authorities budget to the extent that fire cover and public (and firefighter) safety is now clearly compromised.

The FBU also agree with the comments of the 2012 Peer Review

team in that MF&RA has '*a loyal, committed and motivated workforce and a very strong track record in service delivery*'. It is disappointing then that the Authority has chosen to repay that loyalty, commitment and motivation by proposing a change to our long held and popular duty shift system, the FBU will comment further on that issue in the relevant section of this report.

Merseyside

This section is right in reminding the reader that the indices of multiple deprivation identify that 40 per cent of the wards in Merseyside are ranked in the top 5% of the most deprived wards in England. In addition, all the local authorities in Merseyside are within the top 20 per cent of the most income deprived in England.

It is also true that fire deaths are more prevalent in communities that have challenging socioeconomic issues, a fact that this Government is aware of, indicating that such budget cuts that consequently lead to a necessary reduction in emergency frontline fire cover has known consequences, that being an inevitable rise in fire deaths for those areas that have high levels of deprivation, such as Merseyside.

It is very rare that a Government would knowingly imperil its citizens in such a fashion, certainly in peace time, but this seems to be just a case.



Excellent Operational Preparedness

This section opens with a reference to the mission statement in that the Authority are *'Providing our firefighters with training, information, procedures and equipment to ensure they can safely resolve emergency incidents.'*

Whilst the FBU agree with the sentiment of the statement, the depths of the cuts referred to within this IRMP sadly means this is no longer a certainty.

As a result of the loss of 33% of emergency frontline fire appliances, the loss of almost every second appliance in the County and the devastating effect of the loss of another 90 firefighter posts then the FBU strongly urges the Service to review each and every operating procedure to take into account the loss of that emergency frontline fire cover.

The review must take into account the revised safe working practises that would mitigate as best as is possible against increased risk resulting from the loss of immediate and adequate response to fire and other emergencies. It is one thing to declare that a fire appliance or appliances will be sent immediately to incidents it is another thing to apply that in practise.

The FBU have tabled a proposal with the Service that if accepted sets the minimum safe number of firefighters for a number of known operational scenarios (33 in total), which is a key risk and task analysis of all identified operational scenarios and which is referred to as the Critical Attendance Standard, more

commonly known as the CAST methodology.

The CAST methodology allows for a tightly-controlled phased arrival of fire appliances at emergency incidents. It takes account of the effect of this phased arrival on both the incident and on the ability of firefighters to carry out Standard Operating Procedures (SOP's) without increasing the risk to themselves above a level which they would normally expect to face in situations which are themselves inherently risky. Determining what is an acceptable phased arrival – or **LAG** – in fire appliance attendance times i.e. the time between the arrival of the first fire appliance and the second fire appliance sent as part of the initial emergency response to an incident, is critical.

For example, one of the most commonly attended category of incident for the Fire and Rescue Service is for a 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 is 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.

The FBU have identified that one of the main issues of concern with the unprecedented loss of such significant emergency frontline fire



cover is the amount of time it will now take for a second (or third) appliance to arrive on scene to be able to put into effect the safe working practises previously referred to. This LAG time not only informs how operational procedures can commence or continue, but it also is the very essence of the '*speed and weight of attack*' rationale often referred to by professional firefighters.

To underpin how important the speed and weight of attack is considered by Government as well as the professional firefighters the FBU refer the reader to the comments made by the Prime Minister, Mr D Cameron MP, in response to a question put to him in the House of Commons at Prime Ministers Question Time. Mr Cameron stated that ***'Hon. Members must recognise that the most important thing is the time it takes the emergency services to get to an incident. As constituency MPs, we are naturally focused on the bricks and mortar items—whether ambulance or fire stations, or other facilities—but what really matters for our constituents is how quickly the emergency services get to them and how good the service is when they do so.'***

The Fire Brigades Union agrees completely with this comment made by the Prime Minister.

Speed and weight of attack then is crucial for both firefighter and community safety with the timely and appropriate provision of adequate numbers of firefighters to be able to safely do the job being absolutely critical. In its absence safe systems of work are compromised and alternative strategies must be considered and implemented.

However, when someone is screaming at firefighters to act, to rescue their parent, their partner or their child, and you are there as part of the fire service response, it does not matter how *'self-disciplined to work within accepted systems of work'* you may be, as a firefighter you will act.

These are not individual decisions. Such is the frequency of this event that they have become accepted group decisions amongst firefighters throughout the service. In short - they are given no alternative.

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)

This is the very situation the FBU are referring to and will be the very real danger facing MF&RS from this point unless dealt with appropriately.

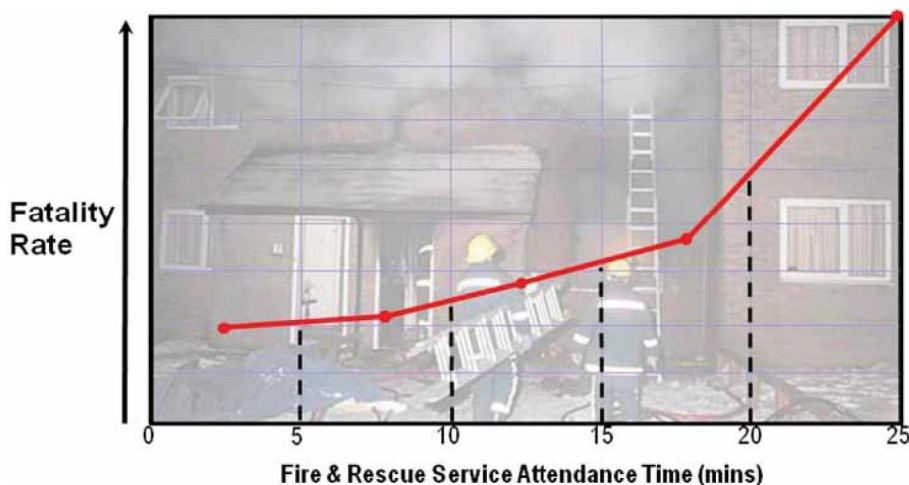
To delay the speed and weight of attack has known effects in relation to fatality rates. It is without doubt that response standards within the UK F&RS's, including Merseyside, are getting slower, and that trend



will continue given the latest round of cuts.

The following graph displays the rapid rise in rate of fatalities the greater the response time, remembering that to safely conduct most operational activities a

minimum of nine firefighters are required as demonstrated by the CAST scenarios. So a first attendance while useful does not stop the clock ticking as the safe systems of work identified by CAST requires the full resource provision of 9 firefighters as a minimum.



Dwelling Fire Cover Risk Assessment – Entec

Site Specific Risk Information (SSRI).

The FBU fully supports the concept of SSRI’s and views it as the one real advancement in the provision of risk information to crews that will lead to a safer community. It properly bridges the arms of fire safety and operational crews inevitably leading to better crew safety, a massive benefit to both in the FBU’s view.

Safe Effective Firefighters.

Whilst the title of this section is misjudged in our view, as you can never provide a safe firefighters job, the section does refer to the concept of Safe Person Assessment (SPA) and while it is fair to say the FBU had some trepidation about SPA, the Services lead managers on this issue have successfully reassured the FBU to the point where consultation has now been successfully concluded.

OPERATIONAL RESPONSE

Operational Response Standards

This section reveals an alarming shift in MF&RS’s approach to the provision of emergency frontline professional intervention to our communities in their time of need.

The IRMP refers to the current standards as being in place since 2004, that is not the case.

Regrettably the standards that the Authority have previously agreed are demonstrably worse than those the Authority agreed in 2004.



Table 5 indicates the standards that have been agreed and put in place since 2004.

Table 5 - MF&RS Response Standards 2004/05 to 2011/14

Level of Risk	2004	2005	2011	2013 +
High Risk	1 st Appliance – 5 Minutes 2 nd Appliance – 8 minutes.	1 st Appliance – 5 Minutes 2 nd Appliance – 8 minutes.	1 st Appliance – 5 Minutes 2 nd Appliance – 10 minutes.	1 st Appliance – 10 minutes 2 nd Appliance ???
Level to be Achieved	85% of occasions	90% of occasions	90% of occasions	90% of occasions

It can be seen then that since the inception of IRMP in 2004 through to the most recent agreed IRMP, that the elected members of the Fire Authority have agreed standards that have worsened over the subsequent years; the FBU have concerns why this would be the case and why no explanation has been offered as mitigation.

Importantly however is that such a degradation of the standards over the years stands in breach of the Authorities Best Value principles along with Best Value legislation. The FBU will return to this fundamental issue later in this document.

EXCELLENT PROTECTION

The FBU are concerned that again the IRMP does not appear to have due regard to the statutory duty placed on the Fire Authority in relation to Legislative Fire Safety and the specific requirement as set out in Governments IRMP Guidance Note 4, and more lately the Fire Service Circular 53/2009 ‘Revised IRMP Guidance Note 4, a Risk Based Approach to Managing a Fire Safety Inspection Programme’.

The IRMP Guidance Note 4: A Risk Based Approach to Managing a Fire safety Inspection Programme states that under the national framework 2008-11, FRA’s are required to have a management strategy and a risk based inspection programme to enforce the provisions of the Fire Safety Order and this *must* form part

of each Fire and Rescue Authority’s IRMP.

Further the Fire and Rescue Services National Framework 2008-11 requires *each* Fire and Rescue Authority to have a management strategy and a risk based inspection programme to enforce the provisions of the Fire Safety Order. This *must* from part of each FRA’s IRMP.

Clearly no such management strategy or risk based programme is contained within this IRMP and as such the Authority may be in breach of legislative requirements on this matter. The FBU again urge the Authority to address this issue as a matter of urgency.



Unwanted Fire Signals/Automatic Fire Alarms (AFA) Protocol.

The Fire Brigades Union view this initiative as one of the most misguided and dangerous initiatives MF&RS has ever considered, it also plays right into the hands of the Tory led Coalitions view of the Fire and Rescue Service and its clear determination to privatise (or mutualise) our industry.

This section starts out to persuade the reader with the age old trick of using statistics to justify a contentious proposal. The IRMP states that in 2011/12 crews responded to 5573 calls to AFA's and that on 89.7% of those occasions these were false alarms. Firstly 89.7% of 5573 is 4998.981 and the FBU is unsure how we would attend .981 of any incident, unwanted or otherwise.

Secondly and if we take the statistics as valid for these purposes, the IRMP identifies that out of the 5573 incident figure quoted, 574 of them actually were incidents requiring MF&RS intervention.

MF&RS are being completely disingenuous in its claim that MF&RA are to introduce a risk based approach to AFA actuations which includes a rigorous call challenging procedure.

Clarity needs to be introduced in this issue, in that there will, from November 2013, be no mobilisation to AFA's whatsoever unless the responsibility for the safety of the occupiers rests with the individuals who reside there, such as sheltered housing, the premise is protected by a 'double knock' AFA system, or the call is received via the 999 system. This is not a risk based approach but evidently a blanket policy.

The Service claims that the initiative will lead to 4200 AFA actuations receiving no emergency fire service mobilisation on 2009/10 figures and that, the FBU feel, is extremely dangerous and counterproductive that will inevitably lead to major property loss and anticipated litigation.

Government (CLG) has investigated this issue extensively and produced a report in 2008. The report was entitled 'Costs and Benefits of Alternative Responses to Automatic Fire Alarms – Fire Research Series 2/2008.'

This document reports that the average number of actual fires per year attended in English 'other buildings' (hospitals, schools, shops, factories etc) over a nine year period is approximately 26,600 of which nearly 6,600 fires were detected by AFA systems. The CLG report also states that *'It is important to note, however, that AFA systems can be shown to offer clear benefits in terms of providing early warning of fire'* the FBU agree with this statement.

CLG looked at a number of options in reducing unwanted fire signals and concluded that a strategy of only responding to an AFA if a confirmation call is received, such as the MF&RS policy, is the only strategy, amongst many looked at, that will result in a significant cost to the community and business because of high property damage associated with attending AFA calls only following the receipt of a confirmation call.

CLG go further and concluded that ***'Strategies which involve delays in a response being sent to a call (eg call challenging and responding only if a***



confirmation of a fire was received) were the least favoured strategies as the increases in property damage caused by fires due to the delay outweighed those benefits accrued in the reduced response and those arising out of the reallocation of resources to fire prevention work. This conclusion would also apply to circumstances where a response was sent only after confirmation of a genuine fire following attendance of a fire service motorcycle.’ The FBU stress this is a Government conclusion which mirrors exactly the historical position of the Fire Brigades Union on such matters.

CLG go on to state that *‘A potential downside of strategies involving reduced initial attendance may be that a real fire cannot be tackled as effectively and quickly. These tradeoffs need to be made on the basis of sound risk assessment and analysis, but very often the data is not necessarily available at a local level to make these decisions based upon qualitative evidence.’*

This again reinforces the FBU’s opposition to blanket policies but also effectively supports our concerns that the MF&RS AFA strategy increases risk to firefighters as we will now attend fires that are more developed as a result of non-attendance, which along with diminishing resources and our concerns in relation to LAG, (the time take for second and subsequent appliances to provide sufficient resources in terms of firefighter number for safe systems of work to be properly implemented) significantly increases risk to firefighters.

This concern has been fully recognised by CLG in its report and they identified there was an increased risk to firefighters from fire and difficulties in scene management and that the control measure that must be considered is not to attempt to fight the fire until the full firefighting numbers are in situ.

If the views of the Fire Brigades Union and CLG are to be disregarded, the FBU refer to the Chief Fire Officers Associations (CFOA’s) statement in the same report in that *‘The CFOA recommended strategy is a risk based strategy with at least one appliance being dispatched in normal course.’* The FBU do not agree with CFOA on this issue and seek a full attendance but clearly the FBU, CLG and CFOA all stand in opposition to the MF&RS strategy.

Finally, CLG identify that the MF&RS will lead to increased in property damage and increased loss of life due to the delay in dispatching the initial response to the initial call for assistance through the AFA system.

The Fire Brigades Union urges MF&RS to reconsider this policy and to reverse the strategy as a matter of urgency to better protect firefighters and communities.

By FIA CEO Graham Ellicott



I was extremely dismayed to hear last week of Merseyside Fire Brigade's decision to not attend some automatic fire alarm(AFA) signals as this decision flies in the face of the Department for Communities and Local Government's research document ['Costs and Benefits of Alternative Responses to Automatic Fire Alarms – Fire Research Series 2/2008'](#).

This research concluded that for unconfirmed automatic fire alarm signals "a one pump attendance at day time AFA calls, two pumps to night time sleeping risk and one pump to night time non-sleeping risk properties is the most favoured AFA response strategy."

Merseyside's belief that every call that cannot be confirmed as a real fire is a false alarm is ill conceived; sooner or later their refusal to attend will mean that a fire will occur that that will cause extreme property damage which will lead to jobs being lost or in the worst case, somebody will be badly injured or die.

The following quote in the Liverpool Daily Post from Dan Stephens, the Chief Fire Officer, is provocative in the extreme:

"Fire alarm monitoring organisations immediately pass the call to us but what they should be doing is ringing up the premises and asking if they've checked. Every time (the alarm goes off) they should be evacuating, but that might not be happening either. We could prosecute for that but that would be prosecuting an awful lot of people and that would be disproportionate."

These reported comments about the alarm monitoring firms are ill-considered as the fire alarm monitoring organisations are akin to the postman who delivers the mail and it's not for them to read the mail and interpret which bits are fit to be read!

In my opinion, this type of confrontational attitude from Merseyside Fire Brigade is no way to constructively deal with the false automatic alarm signals problem and indeed their reported comments could lead the Alarm Monitoring Organisations to consider whether dealing with fire signals is a worthwhile business for the future; should they choose to discontinue this business then this would be a disaster for fire safety and would most likely reflect badly upon the proud reputation of the fire and rescue service.

In virtually all cases 'false automatic alarm signals' are caused by poor building management and the best way forward is for the Responsible Person and his/her team to be educated in the correct operation of their fire protection systems. To this end the FIA has worked with many end users to drive down their incidence of false alarms and encourages other fire stakeholders to do the same rather than metaphorically waving a big stick at the wrong person!

The FIA asks Dan Stephens and his colleagues at Merseyside to reconsider their decision with regard to AFA attendance based upon a common sense constructive approach which is underpinned by DCLG Research.



EXCELLENT PEOPLE

Positive Mental Health and Wellbeing.

The FBU are deeply concerned at this element of the IRMP and whilst it does not constitute any form of risk management planning in relation to resource allocation, it does require comment.

The IRMP makes a bold statement that the Authority recognises that mental health is as important as physical health and *'we seek to prevent, as far as reasonably practicable, circumstances detrimental to mental health and well being.'* To be clear the FBU agree with this statement but it can never be a glib statement with no effectiveness as this statement appears to be.

In 2007, the FBU successfully negotiated a MF&RA Stress Policy with the Authority, the Policy was as good as we believed we could achieve at that time and it was agreed as Policy by the MF&RS Joint Health and Safety Committee.

In 2012 the FBU were informed that as the previous management regime did not place the Stress Policy before members for ratification, the Policy does not exist. The FBU utterly reject that as a notion and view it as a devious and potentially hazardous management trick.

The Positive Health and Wellbeing Policy, whilst sounding impressive does not include a Stress Policy and does very little to assist matters of stress, one of the biggest killers in the workplace.

MF&RA is urged by the FBU to instruct the Service that the agreed Stress Policy and Statement is an extant policy with immediate effect.

Normal Pension Age Report – Firefighter Fitness.

Sadly, the IRMP needlessly strays into areas where it should not venture. This element of the IRMP determines that the Authority will introduce a fitness and health policy that follows the Firefit Steering group recommendation which the FBU believe to be discriminatory in practise.

The FBU support policies that improve firefighters fitness and health but urges the Service to adhere to national procedures, issues such as this are best served through the National Joint Council and not a steering group that is not a constituent of the NJC and therefore is not recognised by either the national employers or the Fire Brigades Union.

PROPOSALS 2013/16

PROPOSAL FOR OPERATIONAL RESPONSE.

The IRMP makes a fundamental proposal in relation to operational response and cloaks it in the

deception of simplification; it is not simplification, it is simply a worsening of the service we provide to our communities.



The proposal seeks to ensure the Service attends any life risk emergency incident within 10 minutes of being requested and will result in a significantly worse standard which is concerning for a number of reasons.

Firstly is the very simple but logical reason of adequately demonstrating to a Tory led Coalition intent on dismantling the public sector and in particular the Merseyside Fire and Rescue Service about the real effect that the cuts foisted upon this Authority will have on service provision. It is unconscionable that members although in no doubt that these cuts are dangerous and will lead to a lesser service, are then asked to assist those cutting us by reducing attendance standards so the effect of the cuts would be largely hidden.

Secondly, the FBU believes that the move to lessen operational standards in this fashion is in breach of Best Value legislation. MF&RA is a best value Authority determined by S.1(1) of the Local Government Act 1999 (the Act) and is bound by Best Value requirements.

Section 3 of the Act places General Duties on Best Value Authorities and S.3(1) *requires* those Authorities to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness. It must be stressed that this 10 minute figure is not a target but a standard and is clearly a lesser standard than is currently in operation, it is not an improved standard (or an exercised function) and so stands in breach of S.1(1) of the Act.

The FBU therefore strenuously urges MF&RA to maintain current response standards and monitor those standards forensically. Any failure to be able to attain or maintain those standards is proof positive that the cuts are having a detrimental effect on the people of Merseyside.

The IRMP provides some qualitative and quantitative evidence that reinforces the FBU's concerns in relation to LAG (the time taken for the second and/or subsequent appliances to attend an incident). Currently the standard that is being met is that the first appliance attends an incident in an average of 5 minutes 22 seconds, the 2nd appliance does not attend, on current resource applications, until 3 minutes 53 seconds later (9 minutes, 15 seconds). Both times will increase as a result of the cuts and **must** be figured into the IRMP.

The FBU is currently in dialogue with the Service in relation to the issue of 'ALARMS' and await further information prior to being able to proffer definitive comment.

Operational Staffing.

The IRMP refers to the use of Voluntary Additional Hours (VAH) which will be used in place of standard rate overtime which we have insisted must be removed from any Risk Management Plan, although by virtue of its presence within the Plan it now requires comment.

The FBU, with the assistance of the NJC, made a ground breaking decision to enter into agreement with the Authority that resulted in a pay cut for our members, moving away from overtime paid at



premium rate (time and a half) to that of flat rate. The FBU agreed to such a time limited agreement, entitled 'Voluntary Additional Hours and the Creation of Wholetime Posts' based on three principles:

1. The commitment of the Authority to put in place 5 new wholetime posts subject to the extent of the cuts to its budget in years 3 and 4 of the Government Spending Review, applicants being drawn only from the existing 21 hour per week contract holders. (Para 3.4 and 9.1 of the Agreement)
2. The agreement would be utilised in limiting the number of appliances placed in the Dynamic Reserve and thus protecting emergency frontline fire cover for the people of Merseyside. (Para 3.4 of the Agreement)
3. That both MF&RS and the FBU reaffirm our jointly held view that the wholetime duty system affords the best level of operational response and that 5 riders on an appliance is always more preferable than 4. (Para 11.1 of the Agreement) And it is recognised that this agreement would be part of a number of measures MF&RS would use to endeavour to meet that aspiration.

We have attached as Appendix 1, evidence from the first quarter of the agreement that greatly concerns the FBU. Suffice to say that to date, no 21 hour contract holder has been provided a

wholetime contract (1), there were very few times that flat rate overtime was used to protect frontline fire cover to the extent that the dynamic reserve was ever reduced to the pre-agreement figure of 5 appliances (2) and there were very few times that 2 fire appliance stations were crewed with 5 firefighters on the first appliance and 4 firefighters on the 2nd, with one fire appliance stations being crewed with 5 firefighters (3).

It was confirmed to the FBU through the Industrial Relations machinery that the majority of flat rate overtime was utilised to provide contractual leave such as Public Holiday leave etc.

It is deeply disappointing that whilst the FBU agreed to take such a step as taking a pay cut in relation to overtime rates to provide a living wage to some firefighters employed on the terrible 21 hour contract and to protect fire cover for the people of Merseyside and assist in firefighter safety in terms of crewing numbers, that the three principles referred to above were not met at all, such a breach of trust, honour and respect is difficult to overcome for future negotiations and lessons must be learnt on this issue.

Operational Response and Preparedness.

The Fire Brigades Union fully supports the re-instatement of wholetime working at Allerton, West Kirby and Eccleston Fire Stations and see little alternative provided the Authority given the financial situation. The FBU go further and urge the Authority to consider further moving away from the LLAR system to wholetime.



CONCLUSION.

There is a great deal that the Fire Brigades Union can, and do support within the IRMP, but the FBU could never support the loss of fire cover for the people of Merseyside.

The FBU do fully support the Authorities lobbying strategy and trusts this strategy will continue as the FBU believes this is the start of the battle for the people of Merseyside not the end.

In conclusion, it must also be remembered what the Fire Brigades Union believes to be the fundamental and underlying point to those whom attack us in that MF&RS is an extremely cost effective service providing the people of Merseyside a good quality value for money F&RS, despite what the likes of CLG Ministers and Sir Ken Knight says.

The FBU also encourages the Authority and the Service to redouble our joint efforts in making our case for a return of the fire cover lost through this devastating attack on our Fire and Rescue Service and that together we can ensure that we can return the Fire and Rescue Service in Merseyside to the position it once enjoyed before the continuing onslaught on a public service whose only objective is to save life.

In 2004 MF&RS provided for the communities of Merseyside a service that cost £2,605 per fire, £1,052 more efficient than the average for metropolitan fire and rescue services.

(Table 6)

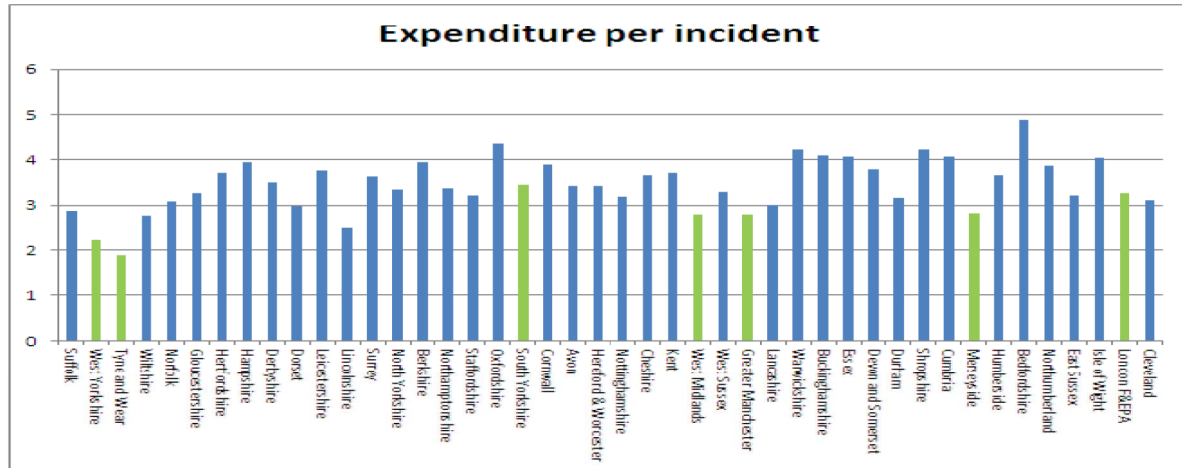
Table 6

Cost per Fire			
Brigade	Funding/1000	All Fires	Cost per Fire
Greater Manchester	£88,634	31,816	£2,786
Merseyside	£60,255	23,134	£2,605
South Yorkshire	£41,141	16,035	£2,566
Tyne & Wear	£45,225	16,846	£2,685
West Midlands	£86,567	27,703	£3,125
West Yorkshire	£66,955	26,215	£2,554
Greater London	£310,183	49,405	£6,278
All Mets	£698,960	191,154	£3,657



In 2013 that analysis extends to include all incidents, rather than just fires, and you can see from Table 7 that MF&RS continues to perform better than most F&RS's in England and surpassed by only two of the family group Metropolitan Fire and Rescue Service.

Table 7



When the statistics are analysed further (Table 8) the reader can see that incidents per firefighter remains right at the top of the table and once further analysis is undertaken, such as factoring in LLAR night time secondary

mobilisation (which results in higher workload for wholetime firefighters between 22:00 hrs and 10:00 hrs), results in some of the busiest firefighters in England.

Table 8

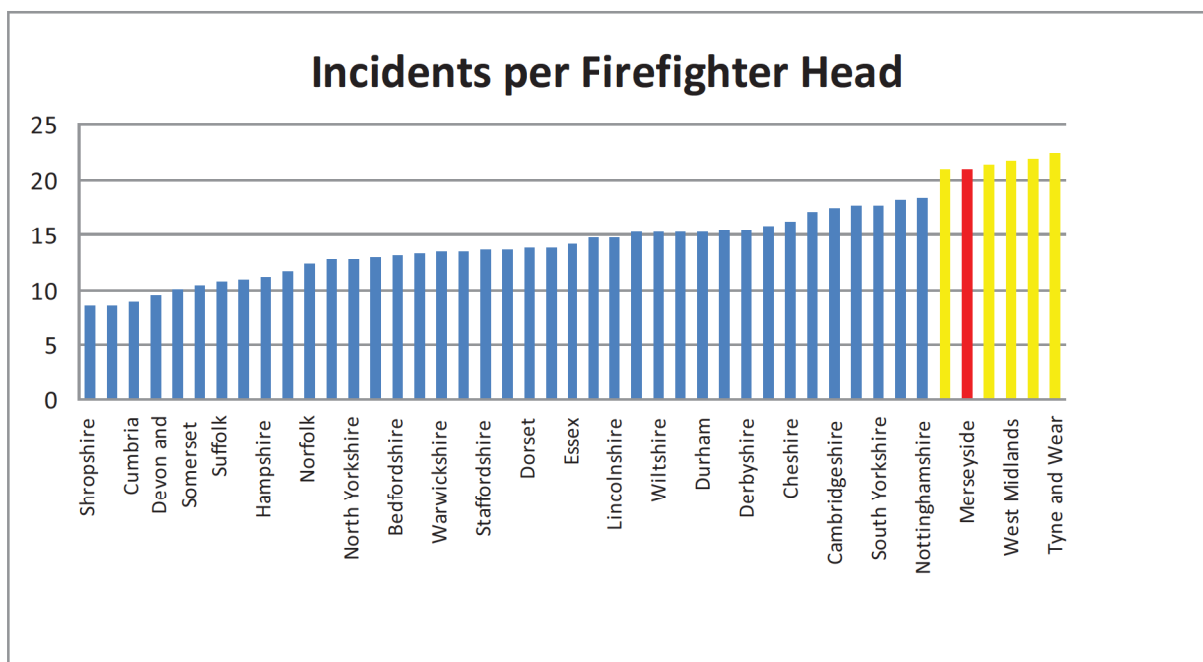
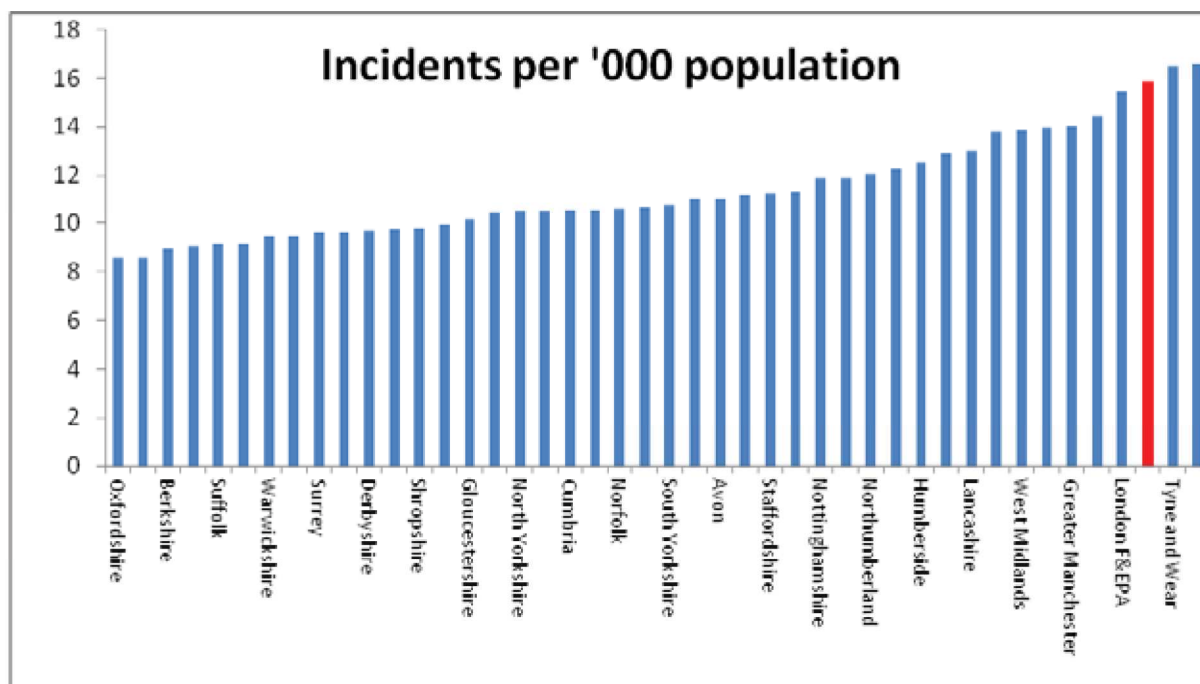




Table 9



The analysis in relation to the number of incidents per thousand population (Table 9) reveals similar results in that Merseyside firefighters face more incidents per thousand population than almost anywhere in the country, laying waste the oft used and utterly false quote that we (MF&RS) are not as busy as we once were.

We (MF&RS) might have to attend less numbers of incidents today than we did 10 years ago but with a consequential drop in firefighter numbers we remain a Fire and Rescue Service with more workload per community member, more workload per firefighter and a more efficient F&RS that almost anywhere else in the country.

It is from this point that the FBU calls on those who run the Fire and Rescue Service down for political gain, sadly repeated as fact by some misguided managers, to acknowledge that they are not correct – it is simply not true.

The Fire Brigades Union further calls for **all** to recognise and celebrate the public Service we provide to the communities we live within, from the emergency fire control room to the community fire station, and that our members do so in a professional, skilled and compassionate manner, with firefighters daily risking their lives to protect those whom we serve.



Fire Brigades Union

Campaigning for Firefighters and Emergency Fire Control Staff

Merseyside Fire Brigades Union

“What are we waiting 4 ?”

Safety concerns regarding MF&RS policy
of a default ridership level of 4 and 4



August 2010



Merseyside Fire Brigades Union is committed to serve the interests of our members as professionally and as resolutely as is possible.

We strive to ensure our members are as best equipped as possible to do the strenuous and dangerous job they are required to do. We are as committed to ensure our members provide the very best fire and rescue service to the communities we serve.

This booklet aims to provide accurate information and comment on the subject of riding with crewing levels of four firefighters on frontline emergency fire appliances.

Executive Summary

The Fire Brigades Union and Merseyside Fire and Rescue Authority have previously reached agreement in relation to crewing levels, these collective agreements are signed by the employers and employees joint secretaries. The Fire Brigades Union simply ask that these agreements are abided by.

This document contains the following fundamentally important points that the FBU ask is considered by the reader:

- *“When it comes to changing the number of fire engines you’ve got or how you crew them, you do have to underpin that with very, very robust evidence before you do it.”*

(DCFO Mike Hagen, Audit Commission Case Study 4, Seeing the light: innovation in local public services May 2007)

- *“An important underpinning principle, however, is that there must be adequate evidence to support and justify any changes proposed, ensuring the maintenance and improvement in community safety”*

(The ODPM ‘IRMP Guidance note 1 final version)

- *3.4For these reasons, you will be expected to consult about any changes in the provision of appliances and crews.’*

(The ODPM ‘IRMP Guidance note 2)

- *“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 analysis of the planning scenarios”*

(The ODPM ‘Preparation for the Fire Service, Emergency Cover Toolkit)

- *‘This arrangement is sufficient to provide a default level of four riders per appliance at an incident; a level agreed by the Fire and Rescue Authority following an extensive risk assessment.’*

(Audit Commission Report ‘Rising to the Challenge’)

Merseyside Fire Brigades Union can confirm that it has never received a copy of any such extensive risk assessment so no consultation could ever take place on this incredibly important issue.

Introduction

It is important to note that The Fire Brigades Union are not asking the Fire Authority to overturn any decision that they have already made, the Collective Agreements signed on behalf of the Fire Authority in October 2006, June 2009 and July 2009 by the Employers Joint Secretary, ACFO Evans, are entirely adequate in meeting the concerns that the Fire Brigades Union have over a policy shift to a default ridership level of 4 and 4 on front-line appliances, what we ask is that the Fire Authorities collective agreements signed by both sides are abided by.

Merseyside Fire Brigades Union has entered into extensive correspondence with Merseyside Fire and Rescue Service management over this issue. Merseyside Fire Brigades Unions' valid concerns over riding 4 and 4, and our belief that the Service has not complied with the statutory requirement for consultation over extensive risk assessments (necessary to implement MF&RSs policy) have been well documented. We do not intend to revisit that documentation here, rather our intent in this document is to inform members of the legislation and the Communities and Local Government (CLG) circulars that we fear the Fire and Rescue Authority could be in breach of, and further to explain in detail the history and the background as to why these Risk Assessments are required to have been undertaken. Risk assessments that to date, despite numerous auditable requests, Merseyside Fire and Rescue Service have failed to provide.

“When it comes to changing the number of fire engines you’ve got or how you crew them, you do have to underpin that with very, very robust evidence before you do it.”

(DCFO Mike Hagen, Audit Commission Case Study 4, Seeing the light: innovation in local public services May 2007)

The Fire Brigades Union would not wish the Fire and Rescue Authority to drift into assent before, through the consultation process, fully exploring all the possible consequences and reports into a crewing level of 4 and 4. The FBU reiterate our belief that this policy poses a very real risk to operational firefighters and will, by firefighters complying with Service Instructions, delay firefighting activities at fires whilst crews await backup.

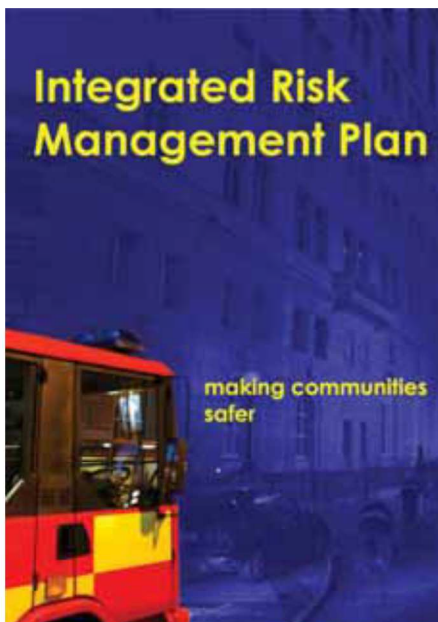
The FBU in this presentation will further inform Councillors why we believe adopting a policy for crewing levels of 4 and 4 puts firefighters at unnecessary risk, risk that is acknowledged in a range of reports (fully referenced within this presentation), reports that we believe have led the vast majority, if not all, other UK Fire and Rescue Services to remain with crewing levels of 5 and 4 riders, and in some FRS's, such as Strathclyde, who ride with 5+5 riders. The FBU are aware of the financial situation but firmly believe that because operational firefighter numbers have been reduced that consequentially firefighter safety should not also be reduced.

Fire Authorities requirements for consultation, Integrated Risk Management Plans (IRMP)

The Fire Authorities responsibility, and indeed statutory obligation to consult with staff over any changes in the provision of appliances and crews through consultation with their representative bodies, is outlined in a succession of documentation provided to Fire Authorities by the then Office of The Deputy Prime Minister, ODPM (now Communities and Local Government, (CLG)).

The ODPM states ‘IRMP Guidance note 1 final version’ in relation to IRMPs that-

“An important underpinning principle, however, is that there must be adequate evidence to support and justify any changes proposed, ensuring the maintenance and improvement in community safety”



The ODPM is very specific in ‘IRMP Guidance note 2 final version, 3. Who should be consulted and about what?’ stating-

‘3.1 The guiding principle in deciding how extensively you consult is that any person or organization that might have a legitimate interest in the proposals under consideration, or who may be affected by those proposals, should have the opportunity to express their views.

3.2 The scope of the consultation you undertake will be proportionate to the nature and extent of any changes proposed.....Staffing and related issues are usually of lesser importance to the public, but of course are of great importance to employees and their representatives.

3.4For these reasons, you will be expected to consult about any changes in the provision of appliances and crews.’

It is important to note that IRMP Guidance note 2 specifically refers to ‘crews’ and not overall staffing which the guidance mentions in 3.2

Office of the Deputy Prime Minister ‘Preparation for the Fire Service, Emergency Cover Toolkit’ January 2004 -

“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 analysis of the planning scenarios”

“Responsibility for the safety and effectiveness of the planned responses will lie with the fire authority and as such they should be approved at the highest level.”

The Fire Brigades Union have not been consulted on moving to a supposed crewing level of 4 and 4. Such consultation would, as per IRMP guidance requires consist of ‘...*detailed risk and task analysis of the planning scenarios.*’ Part of the risk assessment requirement would entail the analysis of the responsibilities and tasks expected of each Firefighter at a range of scenarios, as defined in The Fire Service Training Manual, Standard Operating Procedures and Service Instructions. Where tasks are previously detailed for crews of 5, these scenarios would have to be redefined to incorporate all tasks and requirements for crews attending as a crew of 4 for each type of incident.

Within an Integrated Risk Management Plan (IRMP), local fire & rescue authorities are required to set out how they intend to make adequate provision for prevention and emergency intervention to meet efficiently and safely all normal requirements.

The nationally circulated guide ‘The Dynamic Management of Risk at Operational Incidents, A Fire Service Pamphlet’ states:-

“Legal

Fire Authorities, in common with other employers, have many legal duties in respect of safety. The most relevant to this document are those imposed by sections 2 and 3 of the Health and Safety at Work Act 1974 and regulations 3 and 4 of the Management of Health and Safety at work Regulations (MHSAW), 1992. These require employers to ensure, so far as is reasonably practicable, the health, safety and welfare of employees and others affected by their work activities.



In order to achieve this, they must carry out and record suitable and sufficient risk assessments, then implement the control measures necessary to ensure an acceptable level of safety. Both the risk assessments and the control measures must be regularly monitored and reviewed to confirm their continuing validity.”

Risk Assessment - The Management of Health & Safety at Work Regulations

In the 1990's the manner in which consideration of employee health & safety was approached in the UK underwent a fundamental change. European legislation was enacted which shifted the emphasis from prescriptive requirements to requirements and procedures based on an assessment of risk. The Management of Health & Safety at Work (MHSAW) Regulations placed a requirement on employers to consider all work activities from the perspective of the risk they posed to their employees, and the risk posed to other persons who could be affected by the way their employees were undertaking tasks. It was ruled that fire & rescue authorities (as employers) were not exempt from the requirement to comply with this legislation. This had major implications for the Fire and Rescue Service, particularly in relation to procedures at emergency incidents, where the risks posed to Firefighters were potentially the greatest. Fire & Rescue Service Employers now had to develop Standard Operating Procedures (SOPs); these SOPs have recently evolved in Merseyside F&RS into Service Instructions (SIs), which should ensure that the Service has taken all steps required to actively reduce the risk to a level that was considered as acceptable.

The Chief and Assistant Chief Fire Officers Association (CACFOA), now Chief Fire Officers Association (CFOA) summed up the new health & safety requirement in their 1996 publication '*Guidance on the Application of Risk Assessment in the Fire Service*', stating that it was now necessary to:

“... define the safety critical support issues for fire service personnel and others ...”

(Guidance on the Application of Risk Assessment in the Fire Service - page 6)

The initial Fire & Rescue Service response to this new health & safety requirement was to develop a range of Generic Risk Assessments (GRAs) covering the broad range of risks that Firefighters could routinely expect to encounter at emergency incidents.

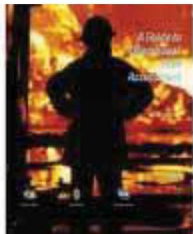
The Generic Risk Assessments were grouped into:

- rescues (from ice, lifts, sewers, collapsed structures etc);
- fighting fires;
- incidents involving transport systems (road, rail, air etc);
- generic hazards (such as acetylene, electricity, chemical hazards, civil disturbances etc.).

These GRAs were published in 1998 under the title 'A Guide to Operational Risk Assessment'. It was however stressed to fire & rescue authorities at the time that the GRAs simply provided information to inform the authority's own risk assessments and SOPs/SIs for the various incidents which Firefighters could routinely expect to attend, crucially stating that-

“It is imperative that brigades use these assessments as part of their own risk assessment strategy not as an alternative or substitute to it. They are designed to help brigades assess their own risks, so they should be included in the brigade’s normal planning process.”
(A Guide to Operational Risk Assessment - page 4)

Crucially ‘A Guide to Operational Risk Assessment, Health and Safety, Fire Service Guide Volume 3’ in its ‘Fire Service Risk Assessment Summary Sheet, Generic Risk Assessment Summary Sheet (GRA 3.1) Section 3 page 15’, lists operational activities in relation to ‘Fighting Fires in Buildings’ as being considered as High Risk to Firefighters; these include heat and humidity, limited visibility, and uncontrolled ventilation. One of the key ‘Control Measures’ it lists in relation to these High Risks is the Pre-Determined Attendance (PDA’s), clearly the amount of Firefighters on the initial attending fire appliances is taken into account in GRA3.1.



Simply adopting the GRAs alone does not discharge the individual employer’s responsibility to carry out a full risk assessment, and to subsequently ensure that the Standard Operating Procedures assessed as being necessary were put in place.

‘Dynamic Management of Risk at Operational Incidents guide’ is personal issue to all Firefighters in the UK. The guide states as a maxim:

“We may risk our lives a lot, in a highly calculated manner, to protect saveable lives.”

This ‘*highly calculated manner*’ refers to the Standard Operating Procedures that are developed and trained against in an attempt to ensure that risk is minimized as far as possible. However to have any real meaning from a risk assessment perspective, SOPs/ SIs have to reflect the actual situation (and associated risk) which Firefighters are faced with at operational incidents.



It is these actual situations the Fire Brigades Union believe, when riding 4 and 4, which require separate and sufficient consultation for Risk Assessments to be carried out. Risk Assessments that the Audit Commission in their document ‘Rising to the Challenge’ state Merseyside Fire and Rescue Service have already carried out.

The Audit Commission report contains the case study by MF&RS which states *‘This arrangement is sufficient to provide a default level of four riders per appliance at an incident; a level agreed by the Fire and Rescue Authority following an extensive risk assessment.’*

The FBU despite numerous requests have not been provided with a copy of the Risk Assessment and consequently can categorically state that there has been no consultation over this issue. The FBU requested a copy of the Risk Assessment from the Audit Commission, they informed us that they had not seen a copy of the risk assessment themselves but had been informed by MF&RS that it had been carried out. MF&RS’s use of ‘risk assessment’ to justify a crewing level of 4 and 4 is in contravention of the guidance contained in the Health and Safety Executive’s *Management of Health and Safety at Work Regulations* which states-

“Where established industry practices result in high levels of health and safety, risk assessment should not be used to justify reducing current control measures”

The Management of Health & Safety at Work Regulations introduced the concept of risk assessment as the planning tool to determine correct Standard Operating Procedures (SOPs). In short, effective Standard Operating Procedures are dependant on accurate risk assessment. Even the casual observer would correctly identify that this risk assessment, by necessity, must include consideration of the number of Firefighters and the type of equipment needed to effectively minimize risk to those Firefighters (the employees) sent to emergency incidents. The Audit Commission Report *‘In the Line of Fire’*, written at the same time the MHSWA Regulations came into force in the UK, prompted the *‘Review of Standards of Emergency Cover’*. The review considered not only an assessment of risk to the community, but also an assessment of the risks faced by Firefighters attending incidents as part of the emergency response, and critically, an assessment of how to maintain this risk at an acceptable or tolerable level.

Correspondence between CFO McGuirk and The Health and Safety Executive (HSE) has confirmed The FBUs opinion with regards to consultation issues in that the HSE state (Christina Roberts HM Inspector of Health and Safety, 26th August 2004)

“An important part of the risk assessment process is to give ‘relevant and comprehensible’ information to employees on the risks to their health and safety identified by the assessment, and the preventive and protective measures to be taken (Regulation 10, Management of Health and Safety at Work Regulations 1999). You also have a duty to consult with safety representatives (Regulation 4A, Safety Representatives and Safety Committees Regulations 1977) or employees where there is no safety representative (Health and Safety (Consultation with Employees) Regulations 1996, Regulation 3).

As well as these legal duties, HSC/E considers that a fully involved and consulted workforce makes a major contribution to achieving a healthier and safer workplace.”

In short, if you reduce the number of firefighters on a fire appliance the additional responsibilities/tasks that have to be undertaken by the remaining crew must be specifically trained for and crews informed of the preventative and protective measure that the Service has adopted as a result of its extensive risk assessment. Quite clearly the HSE indicates that there should not be, as a consequence of removing a firefighter from a fire appliance a ‘just get on with it’ attitude.

Also in further correspondence between the Fire Brigades Union and Ian Phillips, HM Inspector of Health and Safety, 23rd November 2005 states-

“HSE is concerned to ensure that safe systems of work are adopted at incidents, and that where a specific number of personnel are necessary to implement the procedures, they are available. Where the number of personnel is limited, then a different procedure may need to be established, and trained for. Firefighters should always be trained and competent in the safe system of work they employ. HSE also understands that health and safety concerns of firefighters are frequently a consequence of management decisions about standards of fire cover, and would expect risk assessments be updated/reviewed to determine the extent to which crews of less than the recommended standards are able to take action at emergency incidents safely and without significant additional risks to the health and safety of firefighters. Such assessments should be clear about the very real limitations that exist for effective firefighting and rescue action, particularly regarding the numbers of firefighters necessary to conduct BA procedures safely and effectively.”



MF&RS Methodology in Relation to a Crewing Level of 4 and 4 and The Fire Brigades Union Detailed Arguments Against Such a Policy.

A basic premise of MF&RS is that:

It has been accepted in the past that it is reasonable to crew appliances with 4 people on up to 25% of occasions, therefore it must be reasonable (and therefore safe and operationally efficient) to crew appliances with 4 people on all occasions.

Risk management is not a black and white issue. There are *degrees of suitability* when it comes to the control measures that need to be put in place to address a risk. See Figure 1

- There are a multitude of operational circumstances where riding an appliance with a crew of 3 riders would be inadequate to ensure crew safety and to successfully execute operational activities.
- Crewing appliances with 4 people gives the fire and rescue service (FRS) the opportunity to achieve its operational objectives while ensuring a degree of crew safety.
- Crewing appliances with 5 people enables the best level of crew safety to be assured at most operational incidents while providing sufficient resources to complete tasks successfully.



Figure 1: Degrees of suitability

Crewing appliances with only 4 people is not unambiguously unsafe. It is less safe than crewing appliances with 5 people, and it also means sacrificing operational effectiveness. Systems of work have to be adapted to minimise the increased risk created by the shortage of staff.

Crewing appliances with only 4 people does not deliver the highest level of crew safety, but as long as it only happens *infrequently*, the probability of crew safety actually being compromised has historically been considered to be “acceptable”.

MF&RS managers have stated that if Merseyside FBU opposition to default crewing levels of 4 and 4 is upheld the Service may be forced to set a minimum standard of 5 riders per appliance. They say that this would be difficult to achieve and would force appliances off the run if only 4 riders could be found. This is a false premise and is based on a misunderstanding of the process of risk management.

The management of risk does not force MF&RS to make a choice between riding 4 on all occasions or riding 5 on all occasions. It is not contradictory to say that it is reasonable to *strive to ride 5 on all occasions, but still to ride 4 from time to time*.

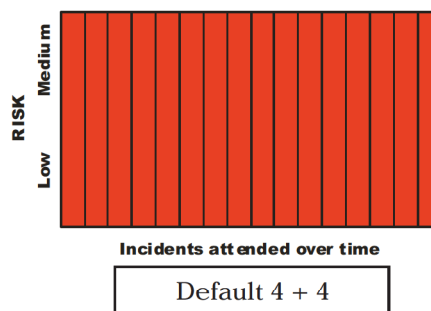
Rather than look at the risk faced by employees at single incidents, MF&RS should take a more sophisticated approach and look at the cumulative risk faced by employees who attend a large number of incidents over time (Figure 2a and 2b).

If the risk to safety when riding 5 is described as low, and the risk to safety when riding 4 is described as medium, then the cumulative risk faced by employees under the confidence level is shown by Figure 2a. The cumulative risk faced by employees under MF&RSs default 4 and 4 crewing is shown by Figure 2b.

Figure 2a



Figure 2b



Even though it was never formalised in risk management terms, it is undoubtedly this approach that was behind the old Home Office “confidence level”. It is important to remember that the confidence level did not mean that it was satisfactory to ride appliances with a crew of 5 on only 75% of occasions; the confidence level was a **MINIMUM STANDARD**.

It meant Fire and Rescue Services should strive to ride appliances with a crew of 5 on **ALL** occasions, but as long as they only used crews of 4 on **NO MORE THAN 25%** of occasions they were keeping risk within acceptable limits.

Riding 4 and the Use of Rapid Deployment Boards

The rider position that is removed due to a default crewing level of 4 and 4 is the Breathing Apparatus Entry Control Officer (BAECO), referred to as No5 on MFRS Rescue Appliances.

Communities and Local Government Fire and Rescue Service Circular 18/2009 clearly states that-



“2.4 The Role of the Breathing Apparatus Entry Control Officer (BAECO) is essential to the safe control and support of BA operations. The skills and knowledge to carry out the BAECO role in terms of maintaining proper records on the Entry Control Board, communicating with BA teams, and the briefing and de-briefing of BA teams, is an integral part of both BA training and refresher training.”

MF&RS managers are relying on the use of Rapid Deployment Boards (RDB) by the initial crew of 4 that attends. Rapid deployment boards are not intended for use all the time but only for use in “exceptional circumstances”. Technical Bulletin 1/97 does not permit rapid deployment procedures to be used simply because there are only 4 firefighters available at an incident.

The simple fact is that there are degrees of suitability with breathing apparatus entry control procedures.

- Using no entry control procedures is unacceptable.
- Using full stage 1 or stage 2 is a safe system of work.
- Using RDBs is reasonable as long as they are only used infrequently (in exceptional circumstances) and where the potential gain is high.

Again the cumulative nature of the risk to which employees are exposed must be considered when thinking about the use of Rapid Deployment Boards.

If MF&RS were riding 4 on a MAXIMUM of 25% of occasions, but striving to ride 5 all the time, then attending a house fire with a crew of 4 might be considered as “exceptional circumstances” as described in Rapid Deployment Board guidelines and the use of RDB would be reasonable.



Rapid Deployment was intended to be used in the “exceptional circumstances” of a crew of 4 arriving at an incident ahead of the crew of 5.

But MF&RS is saying that it intends to ride 4 as normal practice. BY DEFINITION, arriving at a house fire with a crew of 4 will no longer be “exceptional”. It will be normal practice and the Rapid Deployment Board is not intended for normal practice.

The cumulative risk to the health and safety of personnel created by using Rapid Deployment Board on every occasion would be unacceptable and in contravention of the *Management of Health and Safety at Work Regulations* para 30, which states-

“Avoiding risk is the first and best principle of prevention, introducing practices that assist in risk mitigation is the fourth best principle of prevention”

The Fire Brigades Union believe the issue of peer or community pressure, as a result of riding 4, has not been adequately addressed, however it is discussed in the HSE’s publication *Successful Health and Safety Management* (HSG 65).

An entirely probable scenario would be a person’s reported fire where the casualty is not *known to be within a short distance of the entry point*, and where members of the public are watching fire and rescue service activity. Even with Rapid Deployment Board procedure, it would be unsafe for a crew of 4 to enter the building to search for a casualty. However the watching public would expect to see positive action being taken.

This pressure would very likely drive FRS personnel to put their own health and safety to one side and to enter the building anyway despite the systems and rules that are associated with RDB working to ensure health and safety. It is human nature.

This is predicted by the Health and Safety Executive document ‘*Successful Health and Safety Management*’ (HSG 65) which says:



“After an incident or cause of ill health, many organizations find that they already had systems, rules, procedures or instructions which would have prevented the event but which were not complied with. There are many reasons why such violations’ occur. The underlying causes often lie in systems which are designed without taking proper account of human factors”.

The use of RDBs is supposed to be limited to infrequent exceptional circumstances because the safety controls associated with their use can go against human nature and the effect of community and peer pressure to act, even though it is unsafe to do so under the control of RDB only.

By allowing, indeed expecting RDBs to be used on every occasion (the alternative is to stand outside a burning house with persons trapped and await the arrival of the second appliance), MF&RS knowingly allows RDBs as a system for *normal use* that is designed without taking proper account of human factors. HSG 65 highlights the risk and consequence of human failings.

If MFRS believe it is safe to ride 4 + 4, which firefighter goes?

The Fire Brigades Union ask which of the firefighters necessary to do the tasks in line with the Standard Operating Procedures against which we train is not required, by adopting a 4 and 4 policy, in the initial attendance/phase at a ‘standard’ dwelling fire? **Simply put, which of the 9 firefighters we believe is necessary to safely tackle a dwelling house fire does this Authority believe is not required.**



1. **Incident Commander** - Is MF&RS saying that we do not need an Incident Commander to make an initial assessment of the incident and to deploy crews according to this assessment? Is Incident Command a safety critical task and therefore a necessary measure to control the risk to which firefighters are likely to be exposed?
2. **A Team of 2 BA Wearers** - Is MF&RS saying that we do not need to deploy a team of 2 BA Wearers internally in the dwelling for rescue or firefighting? Is a team of at least 2 BA Wearers a minimum requirement for BA Procedures, and is this minimum number of BA Wearers not safety critical, and hence a necessary measure to control the risk to which firefighters are likely to be exposed?
3. **Pump Operator** - Is MF&RS saying that we do not need a pump operator to control the supply of water for firefighting or firefighter protection to the BA team which has been committed to the fire in the dwelling? Is the requirement to have a dedicated pump operator not safety critical, and hence a necessary measure to control the risk to which firefighters are likely to be exposed?



4. **BA Entry Control Officer** - Is MF&RS saying that contrary to Standard (and nationally accepted) Operating Procedures that we do not need a designated, stand alone, BA Entry Control Officer to be responsible for BA control at any dwelling fire incident? Does the F&RA intend to revise its local Standard Operating Procedures/Service Instructions in respect of BA to the extent that they deviate from nationally accepted Standard Operating Procedures in respect of the need to establish BA Entry Control before firefighters are committed in BA? Does MF&RS believe that the requirement to have a dedicated BA Entry Control Officer is not safety critical, and is not a necessary measure to control the risk to which firefighters committed in BA are likely to be exposed?

FRS Circular 18/2009 - Firefighter Safety at Operational Incidents states-

“2.4 The role of the Breathing Apparatus Entry Control Officer (BAECO) is essential to the safe control and support of BA operations. The skills and knowledge to carry out the BAECO role in terms of maintaining proper records on the Entry Control Board, communicating with BA teams, and the briefing and debriefing of BA teams, is an integral part of both BA training and refresher training”

If this 4 and 4 crewing system is allowed to continue, then if difficult decisions are not taken i.e. telling a crew of four to stand outside a house fire and await the arrival of the 2nd appliance, and Incident Command Systems do fail to protect the health and safety of firefighters, MF&RS will have to accept that the situation was reasonably foreseeable and was of their own making. They will have to accept that the root cause was a failure to incorporate adequate corporate health and safety management into the IRMP process.



Determining the Emergency Response The Critical Attendance Standard (CAST)

The FBU CAST planning scenarios are based on a **Home Office Research Report** from the **Fire Cover Review** as follows:

- **Central Fire Brigades Advisory Council**
- **Response Options Planning Scenarios**
- **Version 1.1 (covering Versions 2.0 and 2.01 CFBAC Planning Scenarios 20/01/2000) Produced by the Fire Experimental Unit of the Fire Research Development Group, Crown Copyright 2000**

Government reviews, including The Pathfinder review developed ‘Worst Case Planning Scenarios’ (WCPS). The WCPS built on the work that had already been undertaken on Generic Risk Assessment as detailed in the ‘*Guide to Operational Risk Assessment*’ referred to above.

By assessing the actual situation that Firefighters were faced with at emergency incidents, the WCPS methodology was then able to determine what was needed to deal with the emergency incident and what was needed to maintain risks to Firefighters (as far as reasonably practicable) at an acceptable level. The (WCPS) evolved into the ‘Critical Attendance Standard’ (CAST) used to determine the required emergency response. The required emergency response was determined by assessing the real situation faced by Firefighters at emergency incidents, and then planning risk-control measures which dealt with these ‘**real world**’ situations. It sought to establish what actually happened at a range of common emergency incidents - **what the fire & rescue service was actually faced with when they turned up** - and the response and resource requirements (numbers of Firefighters and equipment) that would be required to implement effective Standard Operating Procedures. Experienced fire & rescue service Incident Commanders were interviewed to determine both the emergency incidents that were routinely faced, and the number of Firefighters and the amount and type of equipment that would be needed at these different types of emergency incident.



The Qualitative experience of these operational Crew and Watch Managers was critical to the process. They are almost always the first fire officers to arrive at an emergency incident quite simply because they are part of the crew on the fire appliances sent when an emergency call is first received by a brigade. In Fire & Rescue Service circles one of the more commonly known conclusions of this element of the Pathfinder research project is that 9 Firefighters are needed at a house fire where persons are reported as being trapped. This level of response is required to deal with the incident effectively whilst ensuring that the Firefighters who deal with the incident are not placed at greater risk than is avoidable.

The system for planning emergency responses was based on the recognised risk assessment process of identifying the hazard, assessing the risk posed by the hazard, and then determining the necessary ‘control’ measures necessary to reduce the risk to acceptable or the research project first sought to establish the different types of emergency incident routinely attended by the fire & rescue service. 35 identified incident scenarios were grouped into different ‘types’ of emergency incident as follows;

- fires in buildings;
- casualty retrieval incidents (such as water rescues and hazardous material rescues);
- casualty trapped incidents (such as road traffic incidents);
- 3 lesser scenarios (covering small fires)

Having determined the incident types, the required emergency response for a given incident scenario (for example a single occupancy house fire where it was anticipated that rescue would be necessary via an internal staircase) could then be established.

The Review of Standards of Emergency Cover and Worst Case Planning Scenario methodology was the most robust risk-based determination of the initial fire & rescue service resource requirements for routine emergency incidents that had ever been undertaken in the UK. These resources had been determined through qualitative analysis (what is known from experience) to ensure that the job could be done without compromising unnecessarily the safety of Firefighters.

A Critical Attendance Standard (CAST), methodology was established (Appendix A). The CAST methodology allows for a tightly-controlled phased arrival of fire appliances at emergency incidents. It takes account of the effect of this phased arrival on both the incident and on the ability of Firefighters to carry out Standard Operating Procedures without increasing the risk to themselves above a level which they would normally expect to face in situations which are themselves inherently risky. Determining what is an acceptable phased arrival - or **LAG** - in fire appliance attendance times i.e. the time between the arrival of the first fire appliance and the second fire appliance sent as part of the initial emergency response to an incident, is critical.

Using the Critical Attendance Standard methodology, the maximum LAG for Standard Operating Procedure purposes is:

APPLIANCE ARRIVAL MAXIMUM LAG

APPLIANCE ARRIVAL	MAXIMUM LAG
arrival of first fire appliance to arrival of second fire appliance	3 minutes
arrival of second fire appliance to arrival of third fire appliance	2 minutes

Hence IRMP attendance times of 5mins, 8mins and 10mins

The maximum 3 minute LAG between the arrival of the first & second fire appliances at an incident assumes an attendance of 5 Firefighters on the first fire appliance to attend every incident covered by a CAST planning scenario. Without 5 Firefighters on the first fire appliance cornerstones of the Fire Authorities IRMP (Attendance Times) are seriously flawed.



The 3 minute LAG reflects:

- the time required for an initial assessment of the incident to be made by the first attending fire & rescue service Incident Commander;
- the time required for initial briefing and deployment of crews (including where necessary deployment in breathing apparatus) before the arrival of the second fire appliance.

The maximum 2 minute LAG between the arrival of the second & third fire appliances at an incident covered by a CAST planning scenario reflects:

- the time required for the Incident Commander to brief the Crew Manager of the second fire appliance attending the incident and for the crew from the second fire appliance to be deployed, prior to the arrival of the third fire appliance.

Increasing LAG above these maximums potentially compromises the safety of Firefighters who will be left with insufficient resources to work within Standard

Operating Procedures (Service Instructions) and safe systems of work at emergency incidents. Any risk assessments which seek to introduce or justify excessive LAG times will have failed to risk assess the real situation faced by Firefighters at emergency incidents. In short, the risk assessment will not be suitable and sufficient. Where the required number of personnel and equipment for an emergency incident can be transported in one fire appliance the LAG times clearly do not apply

Procedures against which Firefighters are training simply can not be put into practice in the real world due to a lack of resources being available when they were most needed - in the early stages of the incident. The simple fact remains that on too many occasions Firefighters have no alternative other than to act when faced with the incident. They are, after all, the professionals who have been sent to deal with an emergency situation, and there is a public expectation that they will act when they arrive.

When someone is screaming at you to act, to rescue their parent, their partner or their child, and you are there as part of the fire service response, it does not matter how *‘self-disciplined to work within accepted systems of work’* you may be, a Firefighter will act. These are not individual decisions. Such is the frequency that they have become accepted group decisions amongst Firefighters throughout the service. In short - they are given no alternative.

The FBU believe that the policy of a supposed default 4 and 4 crewing level means firefighters will have been knowingly placed in a situation by their employer where it is reasonably foreseeable that they will be motivated or pressurized to act unsafely in the interests of saving life. The pressure to act unsafely will be as a result of a deliberate planning decision which delays the arrival of the necessary resources for an emergency incident which can be reasonably expected to occur.

“... 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)



Finally MF&RS cannot rely on the arguments that:

Riding 4 and 4 has been happening and so far nothing has happened so therefore it is safe?

or

Crews are not reporting dangerous occurrences so none are happening?

This methodology is flawed as it asks those at the sharp end to admit to not observing procedures. There are many SOPs/SIs that contain the expression ‘under no circumstances’; or in an attempt to control activities include several do’s and don’ts with many rule-based bullet pointed lists designed to further control the risk-taking behavior of those at the sharp end?

A simple example is that of a house fire with confirmed knowledge that victims of fire are present where previous incidents have identified that regardless of procedures, circumstances have occurred outside of SOPs/SIs. There are many procedures that use phrases such as ‘under no circumstances’ to control action in such a victim centered environment. Do you realistically expect firefighters who do affect an entry despite such behavior controls to own up to application of an unconventional system?

Clearly there are activities that occur at operational incidents which sit outside SOPs/SIs and are unconventional or that may briefly make the working environment unsafe, these occasions will become the norm due to the 4 and 4 policy. However, because people believe they can get into some kind of trouble for failing to observe the rules they do not report unconventional activities or unsafe events and keep their fingers crossed that nobody else will either. Seeing SOPs/SIs involved in failure can attract professional criticism for those managers involved in their design and implementation.

Merseyside Fire and Rescue Authority stands alone in the UK Fire Service as the only Fire and Rescue Service that has a policy of riding 4 + 4

The Fire Brigades Union highlight these legitimate concerns because if left unchallenged the issue of riding 4 + 4, we feel, may ultimately be addressed by prosecutors.

Incident Group	Incident Type	CAST Scenario Description	Ref.No.	Minimum Command Personnel & Firefighters Required Initial response
FDR 1 Fires: Dwellings	Multiple Occu-pancy High Rise	2 to 4 casualties involved Rescue via internal staircase	CAST 1	Command 2 Firefighters 11 TOTAL 13
	Multiple Occu-pancy Low Rise	2 to 4 casualties involved Rescue via 135 ladder	CAST 2	Command 1 Firefighters 9 TOTAL 10
		2 to 4 casualties involved rescue via 9/105 ladder	CAST 3	Command 1 Firefighters 9 TOTAL 10
		2 to 4 casualties involved rescue via internal staircase	CAST 4	Command 1 Firefighters 8 TOTAL 9
	Multiple Occu-pancy Medium Rise	2 to 4 casualties involved rescue via 135 ladder	CAST 5	Command 1 Firefighters 9 TOTAL 10
		2 to 4 casualties involved rescue via 9/105	CAST 6	Command 1 Firefighters 9 TOTAL 10
		2 to 4 casualties involved rescue via internal staircase	CAST 7	Command 2 Firefighters 11 TOTAL 13
		2 to 4 casualties rescue via internal staircase	CAST 8	Command 1 Firefighters 8 TOTAL 9
	Multiple Occu-pancy Single Basement	2 to 4 casualties involved rescue via internal staircase	CAST 9	Command 1 Firefighters 9 TOTAL 9
	Single Occupancy	2 to 4 casualties involved rescue via 9/105 ladder	CAST 10	Command 1 Firefighters 9 TOTAL 10
		2 to 4 casualties involved rescue via internal staircase	CAST 11	Command 1 Firefighters 9 TOTAL 10
		2 to 4 casualties involved rescue via internal staircase	CAST 12	Command 1 Firefighters 8 TOTAL 9
	Underground Complex	2 to 4 casualties involved using Firefighting lift	CAST 13	Command 2 Firefighters 12 TOTAL 14

Incident Group	Incident Type	CAST Scenario Description	Ref. No.	Minimum Command Personnel & Firefighters Required in Initial response
Special Services: CASUALTY RETRIEVAL FROM:	Hazardous Material Incident	Generic incident - BA CPS with HRJ 1 casualty retrieved	CAST 14	Command 3 Firefighters 15 TOTAL 18
		Generic incident - BA GTS with HRJ 1 casualty retrieved	CAST 15	Command Firefighters TOTAL 18
	Height	Rope rescue equipment 1 casualty retrieved	CAST 16	Command 2 Firefighters 9 TOTAL 9
		With 135 extension ladder 1 casualty retrieved	CAST 17	Command 1 Firefighters 4 TOTAL 5
		With 9/105 extension ladder 1 casualty retrieved	CAST 18	Command 1 Firefighters 3 TOTAL 4
		With aerial appliance 1 casualty retrieved	CAST 19	Command 1 Firefighters 3 TOTAL 4
	Lift	Lift 1 casualty retrieved	CAST 20	Command 1 Firefighters 4 TOTAL 5
	Lock-in	Conventional 1 casualty retrieved	CAST 21	Command 1 Firefighters 2 TOTAL 3
		With 135 extension ladder 1 casualty retrieved	CAST 22	Command 1 Firefighters 4 TOTAL 5
		With 9/105 extension ladder 1 casualty retrieved	CAST 23	Command 1 Firefighters 3 TOTAL 4
		With aerial appliance 1 casualty retrieved	CAST 24	Command 1 Firefighters 3 TOTAL 4
		With short extension ladder 1 casualty retrieved	CAST 25	Command 1 Firefighters 2 TOTAL 3
	Water	1 casualty retrieved	CAST 26	Command 2 Firefighters 5 TOTAL 7

Incident Group	Incident Type	CAST Scenario Description	Ref.No.	Minimum Command Personnel & Firefighters Required Initial response
FDR 1 Fires: Dwellings	Multiple Occupancy High Rise	2 to 4 casualties involved Rescue via internal staircase	CAST 1	Command 2 Firefighters 11 TOTAL 13
	Multiple Occupancy Low Rise	2 to 4 casualties involved Rescue via 135 ladder	CAST 2	Command 1 Firefighters 9 TOTAL 10
		2 to 4 casualties involved rescue via 9/105 ladder	CAST 3	Command 1 Firefighters 9 TOTAL 10
		2 to 4 casualties involved rescue via internal staircase	CAST 4	Command 1 Firefighters 8 TOTAL 9
	Multiple Occupancy Medium Rise	2 to 4 casualties involved rescue via 135 ladder	CAST 5	Command 1 Firefighters 9 TOTAL 10
		2 to 4 casualties involved rescue via 9/105	CAST 6	Command 1 Firefighters 9 TOTAL 10
		2 to 4 casualties involved rescue via internal staircase	CAST 7	Command 2 Firefighters 11 TOTAL 13
		2 to 4 casualties rescue via internal staircase	CAST 8	Command 1 Firefighters 8 TOTAL 9
	Multiple Occupancy Single Basement	2 to 4 casualties involved rescue via internal staircase	CAST 9	Command 1 Firefighters 9 TOTAL 9
	Single Occupancy	2 to 4 casualties involved rescue via 9/105 ladder	CAST 10	Command 1 Firefighters 9 TOTAL 10
		2 to 4 casualties involved rescue via internal staircase	CAST 11	Command 1 Firefighters 9 TOTAL 10
		2 to 4 casualties involved rescue via internal staircase	CAST 12	Command 1 Firefighters 8 TOTAL 9
	Underground Complex	2 to 4 casualties involved using Firefighting lift	CAST 13	Command 2 Firefighters 12 TOTAL 14

Incident Group	Incident Type	CAST Scenario Description	Ref. No.	Minimum Command Personnel & Firefighters Required in Initial response
Special Services: Casualty Trapped	Extrication from Machinery / Structures	1 casualty trapped	CAST 27	Command 2 Firefighters 6 TOTAL 8
	Rail Transport Above Ground Accident	2 carriages 1 casualty trapped in each carriage	CAST 28	Command 2 Firefighters 11 TOTAL 13
	RTA	Generic incident 2 vehicles 1 casualty trapped in each vehicle	CAST 29	Command 1 Firefighters 9 TOTAL 10
	Ship Accident	1 ship 2 casualties trapped	Cast 30	Command 2 Firefighters 9 TOTAL 11
	Small Aircraft Accident	1 aircraft 2 casualties trapped LX foam branch	Cast 31	Command 1 Firefighters 9 TOTAL 11
	Small Boat Accident	1 small boat 1 casualty trapped	Cast 32	Command 1 Firefighters 6 TOTAL 7
FDR1 Fires: Property Other than Buildings		Generic small fire	Cast 33	Command Firefighters 3 TOTAL 4
FDR 3 Fires	Chimney	Generic small fire	Cast 34	Command 1 Firefighters 4 TOTAL 13
	Secondary	Generic small fire	Cast 35	Command 1 Firefighters 3 TOTAL 4