

MERSEYSIDE FIRE BRIGADES UNION

OBSERVATIONS AND COMMENTS FOR THE MF&CDA IRMP YEAR 2 SUPPLEMENT (2005/06)

INTRODUCTION

The Merseyside FBU's IRMP Committee recognises the true potential of effective integrated risk management planning. However this potential will only be realised where the mix of prevention, detection and emergency intervention is optimised at both brigade and station levels.

However, attempts to reduce annual revenue budget costs through such proposals as contained within the year 2 supplement stand at odds with a truly risk-based approach to fire & rescue service activities. Firefighters and Emergency Fire Controls Operators are extremely concerned that a simple cost-cutting approach is being advocated by MF&CDA and its professional advisors in the Year 2 supplement, specifically the currently proposed staffing model.

Staff working in the front line of service delivery are clear as to the type of support they need from the Authority to improve their effectiveness in saving lives and property across the whole of the Merseyside area.

From the professional perspective of these front-line staff, the key to effective Integrated Risk Management Planning lies in the complete integration of preventative activity and robust emergency response capability at station level.

PREFACE

The supplement's preface mentions that after an extensive consultation exercise, Merseyside Fire and Civil Defence Authority (MF&CDA) published its first Integrated Risk Management Plan (IRMP).

The FBU were fully involved in that extensive consultation exercise and accordingly offered a comprehensive document to feed into that consultation process. As part of that process the FBU offered 7 recommendations that we strongly urged the Authority to endorse, those recommendations listed below the Union believed were valid recommendations that ensured any variation to the method Merseyside Fire and Rescue Service determines how the Service provides firefighting and emergency responses is properly developed, trialled and auditable:

FBU Recommendation 1:

The Fire Authority should adopt a target of zero fire deaths and work together with the Fire Brigades Union in formulating policy and strategies in order to work towards achieving this.

FBU Recommendation 2:

The effectiveness of current Community Fire Safety initiatives should be thoroughly assessed in order to properly calculate their contribution to bringing down incidences of fire.

FBU Recommendation 3:

That MF&CDA ensure that advocates should augment uniformed personnel not replace firefighters.

FBU Recommendation 4:

That a full and extensive consultation programme is undertaken with the FBU on any proposed revision of standards of fire cover with agreed outcomes based on qualitative and quantitative data and evidence. These agreed outcomes to be trialled to ensure a safer and more effective Fire Service is available to those who work in, and require assistance from.

FBU Recommendation 5:

That action point 30 (referrals to Transco) be the subject of further consultation with the FBU to ensure community and firefighter safety.

FBU Recommendation 6:

The FBU strongly urge that the formulation of action point 43 (response standards to life threatening non-fire emergencies) has the full involvement of the FBU, and that both MF&RS and the FBU to formally discuss and agree outcomes through the employee relations machinery and Health and Safety Committee currently in place.

FBU Recommendation 7:

That MF&RS and the FBU enter into a full and extensive consultation programme on the methodology and ethos of rescue and support appliances in the light of identified and known risks both appliances are mobilised to. It is important to remember that on occasion due to availability of appliances it may be necessary to mobilise 3 support appliances to effect a rescue.

Unfortunately, these FBU recommendations have not been endorsed or enacted upon. We again offer those recommendations within this consultation round.

The FBU, however, again provide observations and comment in the expectation that elected members and officers of the Service will receive such

observations and comments and consider, rather than disregard, appropriately.

The supplements preface makes the point that the Merseyside communities have less fire deaths, fire injuries and fewer fires than they have ever had, unfortunately that is not the case as the Union will stipulate further through this consultation document.

AIMS AND OBJECTIVES

The Corporate aims of the MF&CDA for 2005/06 makes no mention of a drive for zero fire deaths within Merseyside. The Union strongly urges the MF&CDA elected members to adopt a zero fire deaths target and endorse the FBU recommendation number 1 as outlined above.

A properly integrated and risk managed plan should strive to reduce the fire deaths down to zero, and as such the FBU believe it is imperative that the Authority adopt as policy this target.

1. PREVENTION AND PROTECTION

Fatal Fires in the Home

The figures the Service provides in the year 2 supplement are somewhat confusing when compared against the ODPM's Fire Statistics Monitor: Q1 2004.

The Service suggests that fatal fires in the home are as follows:

Pre 1999	20+
1999/00	13
2000/01	16
2001/02	17
2002/03	12
2003/04	9

The ODPM Fire Statistics Monitor however prescribes the nationally collated figures for fatal casualties in accidental dwelling fires, by Brigades (sic), 1999-2004 are as follows:

1999	7
2000	20
2001	13
2002	10
2003	10

2002Q2 to 2003Q1	7
2003Q2 to 2004Q1	8

The FBU is unsure why there appears to be a discrepancy in the figures as the Union understood that the Service provide the ODPM with the figures for national collation.

The ODPM figures, if proved to be the definitive figures indicates an increase in fatalities in accidental dwelling fires and indicates that there is still work to be done to be able to achieve the target of zero fire deaths. The question surely must be how the Service achieves this target.

One more concerning aspect about the ODPM's Fire Statistics Monitor: Q1 2004 is the figures collated for fatal casualties, by Brigade, for 1999-2004. The figures supplied by the ODPM are as follows:

1999	9
2000	26
2001	17
2002	11
2003	13
2002Q2 to 2003Q1	8
2003Q2 to 2004Q1	14

This table (*appendix 1*) records a sharp increase of 75% in the of fatal casualties within Merseyside and far exceeds any increase of any other Service in the family group, with West Midlands decreasing fatal casualties and Greater London remaining the same on the previous year.

Home Fire Risk Assessments (HFRA's)

The FBU fully support community fire safety initiatives that will assist in the drive to decrease fire deaths and participate fully in a Community Fire Safety Working Party set up between the FBU and the Service to discuss and agree initiatives to progress such strategies.

The Union does have some concerns on the validity of the figure quoted in the year 2 supplement, 290 000 HFRA's, but will discuss our concerns through the working party, the appropriate forum to do so.

One area of concern, however, is the statement within the supplement that the research into the effectiveness of Merseyside's HFRA programme which has been independently analysed by Fire Data Research Limited, has made a significant impact upon the levels of accidental dwelling fires in Merseyside. It goes on to state that it also shows that the HFRA programme has had a significant beneficial impact upon the numbers of both fatalities and non-fatal casualties resulting form accidental dwelling fires.

Whilst it is welcome that there has been a decrease in non-fatal casualties within Merseyside and recognising that fatalities has been covered previously in this document, it is evident that accidental dwelling fires have increased by 3% to the levels recorded in 2003. The ODPM figures (*appendix 2*) are as follows:

1999	2009
2000	1976
2001	1796
2002	1605
2003	1589
2002Q2 to 2003Q1	1532
2003Q2 to 2004Q1	1583

Clearly, this trend is somewhat alarming and questions the validity of the research that reports that HFRA's have had a significant impact in dwelling house fires. There is still much work to be done on CFS initiatives and strategies and how the Service intervenes in time of emergencies.

The supplement goes onto to mention that the Fire Data Research Limited report states that not only are the combined efforts of MF&RS reducing accidental dwelling fires and associated casualties and fatalities with the tailored and targeted use of HFRA's as a key component in risk reduction is achieving reductions net of the national trend in all three of these key measures. This statement may have been made within the supplement after the ODPM's figures were released, which is then an understandable error to have made, but it clearly indicates the danger of relying on historic data in isolation, as the recently released figures have reported increases across the board. That also includes an increase of all fires within Merseyside which indicate an increase of 5% on the previous year of 25,481 up to 26,795. (*appendix 3*)

2. EMERGENCY RESPONSE

The FBU fully concur with the statement included within the supplement that rapid firefighting intervention is essential to save life and minimise property damage.

Emergency Response Standards

The supplement refers to response standards for property fires set in the IRMP year one, the Service states that they have continued to monitor the Service performances against these standards. The Service, however, offer no evidence to audit and review performances.

The FBU recommendation aforementioned states:

FBU Recommendation 4:

That a full and extensive consultation programme is undertaken with the FBU on any proposed revision of standards of fire cover with agreed outcomes based on qualitative and quantitative data and evidence. These agreed outcomes to be trialled to ensure a safer and more effective Fire Service is available to those who work in, and require assistance from.

This recommendation from the FBU has not been enacted upon.

The FBU continue to express concerns on these standards are only aimed to be achieved on 85% of occasions rather than the aim being 100% of occasions.

Risk assessment for the FSEC process has been divided into four toolkits, each providing guidance on how to determine the level of risk for a specific range of hazards:

- Dwellings – covering single occupancy dwellings
- Special Services – covering all special services including Road Traffic Accidents (RTAs), extrications, chemical incidents
- Other Buildings – covering all commercial buildings and some high occupancy residential buildings such as tower blocks
- Major Incidents – covering major incidents such as bombs and floods.

The FBU are unsure if these risk assessments have been undertaken and so cannot at this time provide comment upon this issue.

APPLIANCE CREWING LEVELS AND FIREFIGHTER SAFETY

This is the most contentious aspect of the IRMP year 2 supplement and requires detailed comment from the FBU.

The supplement states that:

'The 'old' national standards of fire cover included an expectation that, in most cases, the first attending appliance, which could be the only attending appliance, should have a crew of five, and that any subsequent support appliance might have a crew of four. This expectation was based upon 'custom and practise' and empirical evidence of the activities to be performed.'

The supplement goes on to state that:

'The conclusion of this review is that two appliances with eight crew are highly effective in dealing with most property fires, and that the effectiveness

of the firefighting response for all reasonable foreseeable scenarios is not significantly enhanced by a ninth crew member.'

and importantly:

'Notwithstanding established safe systems of work, the review concluded that this Service does not possess a suitable and sufficient risk assessment to warrant exposing additional personnel to the risk inherent in attending and dealing with a fire situation, when the presence of those personnel will not enhance the intervention capability.'

Firstly the FBU have not received any review of this nature and have not received any risk assessment to underpin the move from nine firefighters to eight firefighters at a property fire.

In correspondence to the Chief Fire Officer dated 12th October 2004, the FBU requested for details of the emergency response planning the Service has adopted as part of the shift to Integrated Risk Management Planning. Specifically, the Union requested the risk assessments the Service relied upon in its determination of emergency responses which are both safe and appropriate for dwelling fires. **(appendix 4)** The Union also requested information on the detailed task and risk analysis that the Service will have relied upon to inform the risk assessments.

That correspondence requested key information in the formulation of emergency response strategies. In reply, the Chief Fire Officer failed to supply the information required to inform the development of emergency response strategies included within the supplement. More worryingly, the response form the Service dated 22nd October 2004 contained the following statement:

'The fact that we established five riders in the early part of the last century (in fact as part of a horse drawn first response!), is not, I am sure you will agree, a risk based approach, and I am unable to find any evidence that determines a decision to ride with five personnel has strong risk based relevance in the 21st century. I will of course continue to seek out such evidence and would welcome your assistance in this research.' **(appendix 5)**

Notwithstanding the point that this statement clearly does not take into account the provision of Personal or Respiratory Protective Equipment (PPE/RPE) such as Breathing Apparatus (BA) it also fails to take into account the development of Home Office guidance concerning the wearing and use of BA which is contained within Technical Bulletin 1/1989 and more recently Technical Bulletin 1/1997 which stipulates, amongst others, the numbers of personnel required to operate a safe system of work, which sets that number at nine as a minimum.

Associated correspondence (**appendix 6 & 7**), however, asks for the FBU's assistance in seeking out evidence that determines a decision to ride with five personnel, and the FBU provide that evidence as follows:

Response Planning

The ODPM has issued guidance to Fire and Rescue Authorities on the process they should follow when conducting the forward planning to determine a 'risk based' response to emergency incidents.

Page 10 of the ODPM document 'Preparation for the Fire Services Emergency Cover Toolkit' states:

'Response Planning

A fundamental part of planning fire service emergency cover is the determination of what response is required to incidents. The FSEC Toolkit enables fire and rescue services to define a response that is specific to the risk in an area and to local practices.

Planning an appropriate response involves:

- Defining the Planning Scenario (PS) that each risk in an area attracts***
- Deciding what resources are required in that scenario***
- Deciding how to 'phase' those resources ie in what order and what intervals they should arrive.***

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

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 FBU are not satisfied that MF&RS has completed a detailed risk and task analysis to justify the reduction in crewing levels attending an incident.

The FBU have completed a detailed task and risk analysis for a dwelling house fire, where it would be reasonable to expect that the Service would have to between 2 and 4 rescues from the first floor. This detailed risk and task analysis concerns casualties rescued via internal staircase, rather than utilising ladders as may be expected

in a similar but more developed or unique incident, which would be a more resource intensive incident.

The rescue of 2 to 4 persons as an analysis flows from the FSEC toolkit that determines Output Areas that contain approximately 150 households. The toolkit further determines that this Output Area relates to a population density of 300-500 people, resulting in an average of 2 to 4 people in each household. That of course would require two BA Teams for firefighting and rescue purposes.

The evidence supplied involves Dwellings: Single Occupancy with 2 to 4 casualties involved with rescue via internal staircase and are included as appendices 8, 9 and 10.

The FBU again attempted to gather the information required to evidence the Services proposal to reduce firefighter crewing levels for emergency incidents in correspondence dated 16th December 2004 (*appendix 6*) to which the reply of the 6th January 2005 stated that:

'The adoption of the principle of piloting the 4 and 4 approach would be very quickly followed by further consideration of the detailed risk assessment that underpins such a principle, and there is no need whatsoever for the urgency you imply with regard to the specific risk assessment.'

'The proposal is that we respond to property fires with a crew of 8 personnel and should the Authority adopt this principle then I would be entirely happy to supply you with very extensive documentation supporting such a principle.' (*appendix 7*)

As the FBU pointed out earlier there is a requirement for any proposal to reduce firefighter crewing levels that attend emergency incidents to be fully risk assessed and risk and task analysed. This appears to have not been completed for this proposal, or if completed it has not been offered the FBU appointed health and safety representatives for consultation, a statutory requirement under Regulation 10 of the Management of Health and Safety at Work Regulations 1999 and Regulation 4A of the Safety Representatives and Safety Committees Regulations 1977.

<p>The Fire Brigades Union strongly recommends that MF&CDA do not proceed or endorse this proposal and awaits the production of the required evidence including risk assessments, detailed risk and task analysis which would counter the FBU's prepared analytical</p>

presentation and after the statutorily required consultation with the representative bodies appointed health and safety representatives.

SENIOR OFFICER COVER

The FBU is mindful of the fact that there is an ongoing review of Senior Officer Cover which is stated within the supplement and as such cannot offer any comment without detail or outcome of that review. The Union as such reserve the right to comment until presented the review for consultation.

STRATEGIC RESERVE

The supplement states that the Services risk assessment shows that the Service is able to utilise up to 10 operational appliances at a time on a delayed response basis during these off peak hours to facilitate superior quality training events and more comprehensive community fire safety work.

The ODPM has recently promulgated a Fire and Rescue Service Circular entitled FSC 55-2004 which circulates the key research findings of the Building Disaster Assessment Group (BDAG). The BDAG chaired by Sir Graham Meldrum states in paragraph 3.8 of its report the following:

'National Working Groups should consider and give guidance on:

- *The physiological effect that prior activities might have upon an individual or teams wellbeing and their ability to safely undertake their task, especially if they are to use breathing apparatus. This is especially relevant to retained firefighters coming form a physically demanding primary employment **or firefighters responding from training activities.**' (appendix 11)*

The Union understands that the Service implemented the current crew based training strategy utilising what it terms as the strategic reserve, before the findings of the BDAG, and could not have been aware of the recent findings of this team. However, as the vast majority of Breathing Apparatus refresher training carried out in MF&RS for firefighters is carried out under this method, with crews available for fire calls, with the vast majority of all other training also carried out under this method, the Union believe the risk assessment carried out by the Service to justify crew based training is now at best flawed and certainly not suitable or sufficient.

The FBU request the Authority enters into urgent discussion with the Unions health and safety representatives to resolve this matter.

STRATEGIC STAND BY

The FBU does not support the use of operational fire appliances 'standing by' at locations other than operational fire stations but will await the Services detailed proposals and associated risk assessment before providing further comment.

AUTOMATIC FIRE ALARMS (AFA's)

The FBU do not support the reduction in any attendance to an AFA but support the strategies the Service has on reducing unwanted AFA's by education and training of worst offenders rather than charging or reducing attendances.

REGIONAL CONTROL CENTRE

The FBU strongly oppose the concept of Regional Control Centres and support other FRA's who are not convinced in the merit of such regionalisation. The FBU call on the elected members of the MF&CDA to support other elected colleagues on other FRA's in resisting the closure of Fire Service emergency fire control rooms to a less efficient, more costly and potentially dangerous notion of a single regional control centre.

APPLIANCES

There are a number of proposals concerning the deployment of appliances within MF&RS, the FBU await the development of such proposals along with further information before offering comment.

WATER FOR FIRE FIGHTING

The FBU share the concern of the Service with regard to the availability of water in times of firefighting and see the proposed reduction of firefighting crewing levels as exacerbating a recognised risk.

The FBU await further information before being able to provide comment.

RESCUE

The FBU await the presentation of the River Mersey risk assessment, without which it is impossible to provide comment at this time.

3. BUSINESS CONTINUITY

FIRE SAFETY SPECIALISTS

The supplement comments that there is an ongoing review of Fire Safety specialists which will be offered the representative bodies for consultation. It is appropriate to await the consultation period before offering comment.

4. ORGANISATION

HUMAN RESOURCES

RANK TO ROLE

There has been concern from the FBU that MF&RS has implemented the rank to role process outside NJC intentions. It is welcome however, that after a joint MF&RS/FBU approach to the NJC which resulted in NJC Joint Secretaries communication that this process has been suspended pending NJC guidance due imminently.

CREW LEVEL MAINTENANCE TEAM (CLMT)

The FBU await the details of the Services proposal which is understood to contain issues surrounding pay, for formal negotiations within the recently agreed negotiation procedures.

WORKFORCE DEVELOPMENT

The FBU is awaiting the review of the Safety Training Centre and will reserve comment until the consultation phase of the review.

IMPROVED WORKING PRACTICES

The FBU are currently involved in negotiations and dispute resolution on some of the details within this paragraph and feel it is appropriate for comment to remain within those forums.