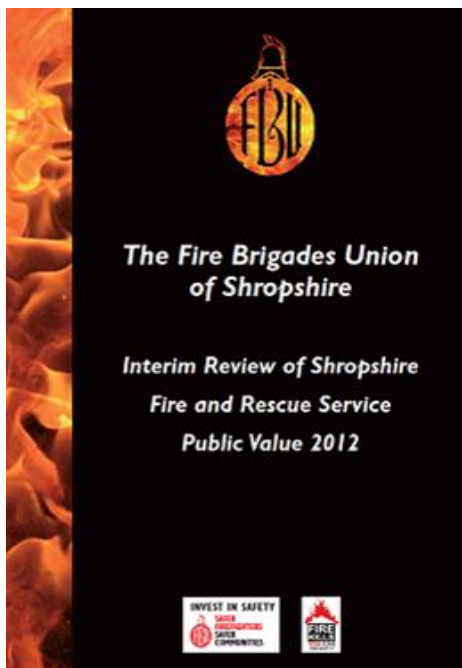


# The Fire Brigades Union Initial Response to Shropshire Fire and Rescue Service's Integrated Risk Management Plan 2015-2020

## Introduction

This document outlines the initial findings of the Fire Brigades Union (FBU) in Shropshire, in response to Shropshire Fire and Rescue Service's (SFRS) Integrated Risk Management Plan 2015 – 2020. The process SFRS has used to develop the Consultation Document has come through the 20:20 project which has been an 18 month undertaking.

We will produce a fuller report in response to the Integrated Risk Management Plan (IRMP) for 2015-2020, but due to the time constraints of a three month consultation this document outlines the FBU's basic position and gives a targeted response to those proposals of greatest concern.



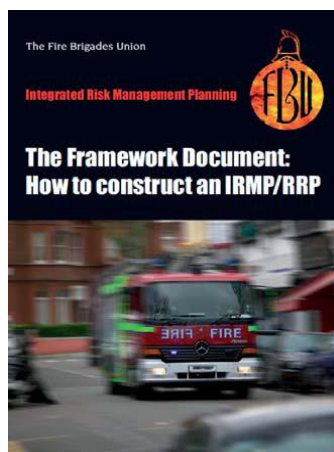
The most basic principle which must be outlined in the first instance is to re emphasise our previous document "Interim Response to Public Value." This document firmly states the minimum requirements that SFRS should provide for an emergency response in Shropshire. It also determines minimum levels of service required in non operational departments and support staff.

The FBU is opposed to any proposals which plan to provide an inferior fire and rescue service to the one we describe. As SFRS has already fallen below these levels through IRMP Public Value 2010-2015, we must therefore be in opposition to the proposals here.

We do however recognise the financial constraints that SFRS has to work under. Despite our opposition to the funding cuts

on every level it is still cuts proposals and it is our position to SFRS's IRMP.

Firstly, despite the funding evolved into a document which tries to outlined in the National IRMP Document "How to



incumbent on us to interact with the under this pretext that we will provide

constraints, SFRS's IRMP document has comprehensive and competent follow the correct process of IRMP s guidance and also in the FBU's National Construct an IRMP"

Of course, just because the process follows the correct procedure, does not mean the same opinions of the outcomes will be drawn into the proposals. Although there are relatively few proposals in comparison to Public Value, the proposals here in 20:20 are of great significance due to the cuts that have already savaged the service to skeletal thinness. These further cuts are pernicious to the extent that they have the potential cause real harm to the service that we provide and to the community that we serve.

### Executive summary

The two main proposals are a potential “Merger of Fire Control” with Hereford and Worcester Fire and Rescue Service (H&WFRS) and a change to Wholetime Duty Systems (WDS) most probably along the lines of Day Crewing Plus (DCP). The other proposals include converting Grey Book posts in Business Fire Safety (BFS) to Green Book conditions of service, reducing the support staff budget and renaming the risk classifications.

There are further proposals to improve performance, which are dealt with in the main body of this document. Sufficed to say here such improvements to support systems of work are supported by the FBU and should be embedded into the mechanisms which seek continual improvement of the service.

Reclassification of the risk definitions in response to the feedback received from phase 2 of the 20:20 process can only be endorsed. In fact it is to the credit of the fantastic work carried out by the four threatened stations (Baschurch, Prees, Clun and Hodnet) that brought this indiscretion to light.

Reducing the budget of support staff has little detail and is difficult to see where and how this can be realised. Support staff, similar to operational staff, since the cuts brought by Public Value, do not have such excesses that cuts to budget of this magnitude can occur without detrimentally affecting the output of support staff. Something will have to give!

Converting the BFS posts to Green Book incidentally will increase the support staff budget, but this is perhaps a bit flippant. The budget but is relatively small, the impact could be much larger. The impact is difficult to quantify but there will be a negative impact on experience for the department and for operational watches/stations. The development of rounded officers and competence of future senior officers will also come under question.

Day Crewing Plus represents a decision by the Fire Authority to prioritise 5 WDS fire engines over the working conditions of their employees. We accept that it is easy for us to oppose either and both of those possibilities, but we believe that this decision is flawed.

There are too many risks associated with DCP which could present turmoil for SFRS. Removing a WDS fire engine is easier to implement, easier to reverse, easier for the public to understand and give support for increased funding to maintain the current configuration of SFRS. Some of the pitfalls of DCP are explained at length in this document. Expecting people to work an 84 hour week is ethically reprehensible.

Merger of SFRS’s Emergency Fire Control Room has the potential to be the most pernicious cut. As with DCP this is also explained at length in the document. Outsourcing the core of the organisation to an outside body is fraught with the danger. There is only one direction that this path takes us and that is toward a full merger of SFRS with H&WFRS. Our understanding is that neither brigade wants a

complete merger, so starting on a path which may be unstoppable once the momentum is in swing is short-sighted and to be avoided.

### Public Value and previous FBU responses

With each response to SFRS IRMP documents we have spent much time explaining the correct methodology to implement IRMP in its correct form. In our “Interim Response to Public Value” the FBU in Shropshire provided its own risk analysis using CAST scenario planning and applied this to the geography and population of Shropshire to determine the minimum requirement of a fire and rescue service in Shropshire. In that report, we also applied basic modelling to provide a minimum requirement for non operational response departments within the brigade.

It is our intention to neither provide further analysis nor reiterate those findings in this document. We have put forward our minimum position of the fire service provision using reliable evidence and robust methodology and as such provided a seminal document by which we will measure the future of SFRS.

What we will examine and respond to are the current proposals and the rationale given to those proposals. We will also make educated speculation of future risk and the direction SFRS should be headed despite its lack of funding.

There should be no mistaken assumption that comments or suggestions made by us in this document, to the proposals, in any way condones the cuts that are recommended in SFRS’s IRMP. As explained above the FBU in Shropshire has clearly set out its vision for SFRS and it should be the aim or mission for both the management and the Fire Authority to achieve the minimum standard recommended by us.

### Future of Shropshire risk

There is a considerable amount of information and statistics in SFRS’s IRMP document and also Process Evolution’s statistical study “Evaluations of Options for Changes to Fire Cover” which we shall take further time to digest and respond to. We will however give an initial overview of the current risk profile and future projection of demand on SFRS here.

Despite a downward trend in the number of firecalls over a number of years for various reasons, the need for a fully funded fire service is as great now as it ever has been.

The numbers of false alarms have greatly reduced, the number of fatalities has greatly reduced and the number of serious injury has also greatly reduced. There is no definite empirical evidence to pinpoint the exact reasons for these trends nor whether those trends will continue at the same rate or plateau. Increased reliability of fire alarm systems, better management and control of fire alarm systems and procedures, large increases to domestic smoke detector ownership, better fire safety education in the community and schools, better prevention and protection advice to businesses, safer materials in the home, safer cooking equipment and a rapid reduction in the prevalence of smoking are all no doubt contributing factors.

But, after a short hiatus, the population of Shropshire is rapidly increasing again with many large scale developments in Telford and many others throughout the county. The average age of the Shropshire population is also increasing, which will present a greater proportion of vulnerable adults in the future.

A greater complexity of incidents is sure to continue. With technological advances in home security and insulation providing greater hazards in building fires, in vehicular design making RTCs more difficult and attendance at greater numbers of water incidents, flooding and wildfire means that intervention should continue to be the primary focus of the UKFRS.

Statistical evidence provided by SFRS demonstrates that the monetary value of rescues performed by SFRS' Firefighters is double the value of SFRS's budget. This takes no account of property, businesses and livelihoods saved.

Clearly, the worth of the service it provides demonstrates the need of proper investment into SFRS.

### Reserves

It is completely understandable that an organization with an annual budget of £20 million, no room for failure and a high potential of risk has a considerable fund in reserve to cover foreseen and unforeseen circumstances.

SFRS reserves at present are in excess of £8.5 million and rising, largely due to the retirement profile of its workers leaving prior to posts being cut. This has led to dire staffing issues at times, but also gives SFRS opportunity to plan the future properly.

It would be morally reprehensible to spend those reserves (once they're gone, they're gone!) on ventures that prove to have no value.

For instance, if £1m of the reserves were spent on refurbishing Telford Fire Station to accommodate DCP shifts which then proved to be unsustainable in the future, for whatever reason, that money is lost and wasted.

Just because the reserve has become the hobby horse of Eric Pickles et al, does not mean that SFRS has to squander it at the first opportunity. If there is a possibility of gambling away £1m, perhaps there should be more thought in using those funds to keep our Emergency Fire Control Room in Shrewsbury open for another 5 years.

Many of the reserve funds are earmarked. But, that does not mean that the use of these funds is not flexible. It is important that whatever those funds are used for, they must be invested wisely to ensure the safety of Shropshire and to protect the future of SFRS.

### Council tax increase

SFRS took the decision to increase its precept by the maximum amount allowed to prevent a referendum, namely 1.99%. This was a necessary decision to protect the level of service supplied to the Shropshire public. As one of the most efficient FRS in the UK there are no areas that can be cut back, especially after Public Value, without detrimentally affecting service delivery. The FBU in Shropshire applauds the Fire Authority in making this decision despite obvious pressure from Whitehall.

We would hope that the Fire Authority continues its brave approach over the coming years. Inflation is falling toward 2%, so increases to council tax below that amount (1.99%) still represents a cut to the future budget in real terms. The possibility of inflation returning to the 5% mark of recent years is a very real possibility, especially if interest rates start to climb.

In previous years, budgeting forecasts have predicted a pay and prices increase of 2%. With wages the largest proportion of expenditure, increases have been pinned back to 1% for a number of years; the 5% increase in pay and prices used in the predictions for IRMP does seem overly pessimistic.

This would question the need for such pernicious cuts that this IRMP proposes.

#### Phase 2 20:20

We cannot make a response to the final proposals in SFRS's 20:20 IRMP without making comment on some of those proposals that were removed following the phase 2 consultation. We will make a fuller comment to the entire 20:20 process in a comprehensive formal response document, but it is timely to refer to some aspects here.

#### 4 RDS Stations

The reprieve for Baschurch, Prees, Clun and Hodnet as a result of the second phase of 20:20 is massively welcome by the FBU in Shropshire. Despite the highly active campaigns runs in each of these station areas to persuade the Fire Authority not to proceed with these closures, it is clear to us that the financial easing on SFRS's budget was the major factor which brought their reprieve.

Prees and Shrewsbury RDS have been threatened with closure before. There is no doubt that if finances become as tight as they were predicted to be during 20:20 then such proposals of cuts will re emerge.

Of course the FBU will always campaign against cuts, but cuts to the frontline service will always attract our greatest attention. The importance of the entire network of fire stations, appliances and most of all Firefighters is paramount to providing a decent fire and rescue service for Shropshire and the safety of SFRS's personnel.

The rate of Firefighter deaths has been increasing over the last decade. This coincides with a longer term cuts agenda that the UKFRS has implemented over the same period. Nearly ten thousand less Firefighters means slower attendance times meaning fires are more developed upon arrival. More importantly it means a greater delay before subsequent appliances arrive. This means that the first crew are over burdened in the initial phases and more likely to take excessive risk.

SFRS is one of the best performing brigades in the UK despite its comparative underfunding. Any further denigration of the front line provision in Shropshire can only lead to dire consequences.

#### 135 ladders

Similar to the removal of the four RDS stations, the removal of the 135m ladder proposal is largely down to the easing of financial pressure.

It does however represent and demonstrate how desperate the financial predictions were that such a proposal to save a relatively small amount, but with potentially disastrous consequences, was seriously being considered.

### Emergency Fire Control

The proposal to “merge” SFRS’s Emergency Fire Control Room with Hereford and Worcester represents the largest change in the document to the way SFRS operates.

Over previous years the brigade has undertaken, with the aid of a centrally funded grant, project work to create resilience between Hereford & Worcester and Shropshire via mutual fall back arrangements. The aim was to create interoperability between the services using similar operating systems and so would therefore safeguard the future of both Emergency Fire Control Rooms. This was a welcome development after years of uncertainty caused by the doomed misadventure of Regional Fire Controls.

However, once this interoperability has been established the next step suggested by the 20:20 process is to reduce the capacity of SFRS’ Emergency Fire Control Room.

The direction of travel is evident. Despite claims that SFRS’s Emergency Fire Control Room would not come under threat, and that mutual resilience with HWFRS would safeguard the function in Shropshire; the opposite is true. The long term aim is not only to “merge” with HWFRS but clearly for the function to be outsourced in its entirety.

Therefore, the FBU strongly opposes the proposal to diminish SFRS Emergency Fire Control and is also surprised that SFRS are pursuing this course of action with zeal. During the ill fated Fire Control Project, despite its eventual and obvious catastrophic failure that only seemed to be predicted by the FBU (at least publicly), it was widely accepted that if successful, regional fire controls would be a major first step toward regional fire services.

Evidently then, outsourcing SFRS’s Emergency Fire Control Room to HWFRS would quite clearly be the first major step toward a West Mercia fire service.

The FBU does not stand in the way of progress, if that is genuinely what it is. However, we have seen over recent years that in terms of fire service; biggest is not best. SFRS was deemed by the independent Audit Commission to be the most efficient FRS in the UK. With our Emergency Fire Control Room being at the heart of that efficiency, this proposal risks throwing that mantle into obscurity.

Two of the reasons for SFRS’s fine record in efficiency is exemplified by the flexibility within Control to encompass a huge range of other tasks that make it the logistical hub of the service and its ability to function despite being understaffed for decades.

### Staffing levels

To be able to coordinate a moderately complex fire call through to its conclusion (this is dealt with more thoroughly below), it is necessary to provide a minimum of three staff in the Emergency Fire Control Room.

As we pointed out in our “Interim Response to Public Value” applying the ridership factor to the minimum ridership level gives an establishment requirement of 5 per watch. This is interestingly the watch strength in HWFRS which is under threat to be reduced to the same levels currently in SFRS.

Therefore, by understaffing our Emergency Fire Control Room by four (1 per watch) SFRS has made (and continues to do so) an annual cost saving of £150,000 for decades. This can only be seen as remarkably efficient.

The introduction in recent years of an RDS complement in Control has been of huge benefit in keeping SFRS’s Emergency Fire Control Room fully staffed. This bespoke solution is credit to SFRS and its relationship with its workers and their Trade Union.

However, the 20:20 document is misleading when comparing the availability of staff in too simplistic terms. The document differentiates between WDS Firefighters (Control) being “on duty” and RDS Firefighters (Control) being “available.” These are clearly two different things designed to paint a picture of inefficiency which just isn’t there.

This depiction in the document also claims that there are eight RDS Firefighters (Control), a total which has never been realised and is unlikely to be. This depiction also infers that all of them are available for all of the time. This just cannot possibly be true.

#### Centre of all operations

A huge range of other tasks, centre of operations, logistical hub or “out of scope” work are all terms used to describe the importance of our Emergency Fire Control Room away from the handling of emergency incidents.

Statistical information, management information systems, staffing levels, appliance availability, officer availability, accident reporting, defect reporting, sickness reporting, out of hours calls, risk information updates, are to name but a few of the tasks undertaken by Control that assist with the coordination of the whole brigade.

Outsourcing Emergency Fire Control Rooms are the first steps toward mergers or regionalisation of brigades and it is easy to see why operational considerations would naturally lead to this conclusion. But as described above, non operational tasks if taken over by another brigade will equally enforce the momentum toward a merger.

Of course, this out of scope work could be removed from Control and redistributed around the brigade with perhaps the creation of a “Staff” department and expansion of the Operations department, but this couldn’t possibly give 24 hour cover and is likely to be less efficient and unwieldy. And why would you bother?

#### Operational Response

This is a huge area for deliberation when considering closing or even lessening the provision of SFRS’s Emergency Fire Control Room. Reduced capacity, resilience against foreseen and unforeseen eventualities, local knowledge, differing operating procedures, both in Control and by operational crews, support for Incident Commanders, complexity of role and coordination of large scale incidents, are all separate but interconnected aspects that need greater focus.

## Large Scale Incidents

This does not need to be the 7/7 bombings or even Shrewsbury Castle or Tern Hill, this could be anything that requires 4 fire engines or more, that involves casualties or simply an incident that could be protracted over a period of time. To illustrate the importance of having the Emergency Fire Control Room on site, a question that should be put to officers is; how often do they attend the Emergency Fire Control Room for such incidents? Do they find it beneficial in the coordination of the incident that they can interact directly in the Emergency Fire Control Room with the crews, the Incident Commander and also with the overall coordination of the incident?

## Complexity

The role of Firefighters (Control) is hopefully no longer misunderstood within the fire service in general. The misconception of Emergency Fire Control as a call handling centre should now be completely dispelled following the abandonment of the Regional Fire Control project.

The statistics show that there are less calls to the fire service, but those calls are more complex than ever before. Fire Control plays an integral part of any rescue. The number and proliferation of different appliances and crews requires greater knowledge and understanding. A wider range of incident types and procedures are required to deal with all incidents. Contingency, intelligence and planning in Fire Control underlies the complete running of the service. SFRS cannot afford to lose this central function. A function that cannot easily be recreated when it has gone.

Complexity and capacity are intertwined here. For those people who have heard the harrowing nature of a fire call where a Firefighter (Control) has rescued, by means of instructions to the caller, a person or family trapped in an upstairs bedroom of their burning house, will know how demanding and important the role that Firefighters (Control) play in the rescue of live casualties.

To understaff the Emergency Fire Control Room, by allowing H&WFRS cover both Fire Authority areas with just three crew is dangerous. A joint Emergency Fire Control Room will not be able afford the capacity for a third of their crew to be dedicated to such a rescue.

## Incident Commanders

Two way support, advice, information and a common understanding of the brigade's procedures, resources and people, between Control and operational Incident Commanders all enhance the successful outcome of incidents. This is impossible to quantify and most probably underestimated, but once HWFRS are remotely coordinating Shropshire's incidents there will be a detrimental impact on the high level of service currently received by the public of Shropshire. All personnel have a huge pride in being able to deliver high levels of service to the public despite years of underfunding. Losing our Fire Control will have a much bigger impact than can be envisaged.

## Differing procedures

Although different operational and Fire Control procedures have been a major part of the project between SFRS and HWFRS to enable the interoperability of Fire Controls in respect of the mutual fall back arrangement, the differences between the two brigades can never be fully eradicated.



Different response standards, different equipment, different terminology will all hamper operational effectiveness. This is a veritable minefield and one that will only precipitate the hastening of an inter brigade merger rather than homogenisation of Fire Control in isolation to the rest of the brigade.

#### Local knowledge

Local knowledge is the argument that the public understands most and hence receives disproportionate coverage. It is of course still a valid point and examples of appliances sent to the wrong address are more commonplace where outsourcing has taken place. Information Technology has significantly improved over recent years. SatNavs are more accurate, mobile phones host a multitude of functions, but I.T. is still subject to its limitations which are a lack of real world understanding and unexplained failure.

#### Resilience

Cooperating with HWFRS to establish a mutual fall back arrangement represents text book IRMP. Identifying, analysing and assessment of risk followed by developing strategies to cope with that risk is precisely demonstrated by the collaboration thus far.

Communication failure, IT failure, staffing epidemic, spate conditions and continuation of service during a major incident are all issues that properly require attention and rightly instigated the project. To then use the interoperability that has been created in order to cut costs (but expose the organisation not only to those original risks but also to magnify those risks) is foolhardy.

#### Capacity

Capacity is of course linked to resilience, but is a straightforward numbers issue. HWFRS have a similar sized Emergency Fire Control Room covering the large area of Hereford & Worcester. SFRS's Emergency Fire Control Room in Shropshire covers the largest land locked county in England. Expecting one Control to cover both these areas is extremely risky.

The statistical probability of simultaneous incidents is exponentially increased. It should not take too much logic to see that the number of times that HWFRS's Control Room will become overrun with calls will also increase exponentially. The risk of unanswered calls in either county is a level of service the public will not countenance.

A call to the fire service is often made in the darkest hour of a person's need. Surely SFRS cannot contemplate such a risk that a call of this nature is unheard!

#### Hours of work

The Fire Cover Review section devoted to Fire Control's hours of work begins with "On Duty Fire Control Operators." In fairness this is the only reference of antiquated terminology, the document reverting to "Firefighter" in the rest of the section.

The section looks at three alternative shift systems. The second of which is DCP. DCP in Fire Control is an absurd notion which cannot bear the most superficial scrutiny, to such an extent that we will give no further explanation here!

One employee is working on annualised hours in Fire Control. Whatever the outcome for the individual does not necessarily infer a system that can be implemented for the rest of Fire Control staff.

Peak Activity Crewing (PAC) has got the wrong end of the stick. The error is also applied when inferring that PAC could be used for staffing of fire engines.

As explained earlier, the staffing in Fire Control and for that matter on fire engines is expressed as minimum crewing levels. If there is heightened activity (such as the example used-bonfire night) the brigade need to bring more people on duty; not less.

### Day Crewing Plus (DCP)

The proposal to save £400k pa due to “changes to the current wholetime shift system” seem rather optimistic. Although it has been left *open to offers* in the 20:20 process, the distribution of the Day Crewing Plus example is the harsh reality.

The removal of a WDS appliance from the fleet had been considered in the first two stages of 20:20 and was removed from the final stage due to the easing of the financial squeeze on SFRS. Clearly, this is welcomed by the FBU, but it does represent a conscious decision by the Fire Authority to maintain 5 full time fire engines in Shropshire to the cost of other detriments to the service.

In very basic terms, providing 5 full time fire engines 24/7 every single day, requires a certain amount of person hours. In the case of the current configuration of SFRS’s fire engines this means 136 personnel.

There is no magic system where redistributing those 136 personnel will provide more fire engines. There is no magic system that provides five fire engines with less personnel. The choice is stark; either fewer fire engines, or those personnel work for a considerably lower rate of pay.

This lower rate of pay is achieved in the Day Crewing Plus system by doubling the amount of hours of those people assigned to it. In Lancashire’s model, a 27% increment to overall pay masks the fact that the rate of pay for DCP has dropped by more than a third.

### Legal uncertainty number 1

When the DCP salary is taken as a total in comparison to hours worked, clearly a person earning in excess of £36k pa is not likely to fall foul of the National Minimum Wage (NMW). However, a similar scenario is currently under legal challenge.

This is the case of a care worker required to sleep over on call at the residential care home. This case has been won by the worker at Employment Appeal Tribunal (EAT) stage and applying the same logic used here to DCP would also put DCP in breach of the NMW.

In basic terms, the DCP allowance is paid for the non positive hours which equate to 42 hours per week. The DCP allowance amounts to £7k pa which is the equivalent hourly rate of £3.21. If there was a successful legal challenge in the future against DCP along these lines, which meant the NMW being paid for the non positive hours then surely this would make DCP completely uneconomical.

## Day crewing

DCP despite its uncertainty is the fashion item of the UKFRS. As with CARPs which have now become obsolete, we expect DCP to become an anachronism of this age. With much greater longevity and success, Day Crewing duty system which is recognised in the National Joint Council Conditions of Service, is a much overlooked system that has worked in SFRS in the past, but has not been included as a suggestion in 20:20.

With 2 WDS and one RDS fire engines in Shrewsbury in comparison to three WDS and two RDS fire engines in Telford the scope for change in Shrewsbury is less than Telford. Bearing this in mind and with a number of personnel with WDS and RDS contracts in Telford, surely this should require some investigation?

## Lancashire model

DCP has become a modern day Chinese whisper. The Lancashire model is to our knowledge, the only DCP system that has been through the NJC Technical Advisory Panel (TAP). Many systems being operated around the UK are variants on Lancashire's model which presumably have been negotiated locally.

One such DCP scheme is that which is in the process of being introduced in H&W and is the template used as an example in the 20:20 process. Dilution of conditions of service via variation upon variant is not acceptable.

Therefore, any negotiation of DCP will have to start from the Lancashire model.

## Recent Experience

Larger brigades than Shropshire have introduced DCP after its inception in Merseyside and Lancashire in very recent years. It is a new idea and where it was introduced the intention was to justify the existence of fire stations with relatively low call volumes.

It was also interesting to note that it has mostly been introduced into much larger brigades where the percentage of DCP personnel in comparison to all WDS was still very low.

Both of the reasons above for larger Brigades to introduce DCP are not applicable to Shropshire. SFRS has a very small number of WDS staff and small number of WDS appliances. SFRS's WDS fire engines do not have comparable call volumes to those stations where it has been implemented.

In actual fact, SFRS is now looking at DCP just at a time when other brigades are starting to cool on the idea. This is for many reasons which we will look at below, but it is interesting to note that Merseyside has closed two DCP stations and opened a WDS station to replace them.

## Family Friendly

No shift system is family friendly as they all include unsocial hours, night work and weekends. However, the current 2-2-3 system is widely regarded as the best available to provide 24 hour cover.

This is both in respect of ease of management of the system for the brigade and also by compressing hours into 2-2-3, gives our members reasonable time off to spend with their family.

It is of no surprise that where DCP has been introduced, most of the Firefighters on DCP shifts are close to retirement. There are no women and very few with children or single parents working DCP. Now that Equality Impact Assessments are no longer mandatory, it may take some time before the challenge against DCP in this respect is forthcoming. But it will come as no surprise when it does.

Many of the DCP policies throughout the UKFRS, including the H&WFRS's example, try to hide unsocial hours and the commitment to long hours through the smokescreen of self-rostering. There is no hiding the fact DCP requires an employee to undertake an 84 hour week. Where self rostering has been introduced on DCP station, invariably personnel organise themselves into a 4 on 4 off routine.

In reality, this means a Firefighter reporting for work on Monday morning at 09.00 will not be able to return home until 09.00 on Friday morning. Interestingly this part of the system was reported in the Shropshire Star on 13<sup>th</sup> July. In response to the article online, even those names that are often critical of Firefighters were against DCP. Many recognising it as extremely unfriendly to family life and viewed it a draconian system of work.

#### Volunteers

With DCP falling outside the Working Time Regulations (WTR) all fire services that have introduced DCP or a variant, have required the individual to opt-out of the WTR. This therefore requires volunteers for DCP as people cannot be coerced. This is because the opt-out is only available to the individual and not the employer nor the Trade Union.

As would be expected then, those people who have elected to opt-out of the WTR to undertake DCP have had a considerable incentive to do so. Experiences in other brigades tell us that these incentives fall into two categories, neither of which is related to the increase of salary.

The first of these incentives is final salary pension. This is a huge carrot akin to rapid promotion toward the end of an individual's career to bolster their pension which is based on the best 12 months within the person's last three years of service. Interestingly, it is this perceived abuse that has caused the Government to overhaul pensions from 2015. There is no doubt that from 2015 all public sector pensions will be Career Average Related Earnings (CARE) schemes meaning that this particular incentive is finite.

In effect, 14 posts of DCP in Shropshire will provide the opportunity for a large proportion of staff to either retire earlier than expected or retire with a significantly enhanced pension. That DCP is dependent on the individual's opt-out, the control of who will be employed in the DCP posts is handed to the employee. This contrasts with the rapid promotion scenario which is under the control of the brigade's promotion policy and also requires the individual to greatly develop themselves to secure their promotion.

The other incentive is recruitment into the service. It may well be legitimate to offer a DCP post to a new recruit with the proviso that they opt-out of the WTR. This would be legitimate if these were the only vacant posts; otherwise the applicant may have to wait indefinitely until other crewing system posts become available.

However, once an employee established themselves within the brigade, for instance, passed their NVQ, secured a mortgage (at a significantly higher salary), started a family etc., then that employee has only to rescind their opt-out to require the brigade to find them a post on the WDS. Not only would it be uneconomical to dismiss such an employee having invested so much resources and training into them, but dismissal would also be in contravention to the WTR.

#### Legal uncertainty number 2

The WTR is much more complicated than the first legal uncertainty regarding the NMW because this is a constantly moving feast with several test cases.

Firstly, we expect that there will be several challenges to the design of DCP because, despite there being an opt-out there are many areas of the WTR which are mandatory. There are aspects of DCP which could be regarded as contravention to mandatory parts of the WTR.

There have been test cases regarding the working practices of hospital junior doctors, especially their on-call hours. There has also been European wide cases that have provided uncertainty to the hours available to RDS Firefighters. This caused considerable concern at the time as the consequences could have been disastrous for the UKFRS, particularly for rural brigades like Shropshire.

What is clear though, is that despite the operation of DCP in many parts of the UKFRS its continued existence is not secure due to the uncertainty that hangs over it with WTR challenges.

#### Legal uncertainty number 3

Referring back to the first incentive, that of final salary pension schemes; this future is also unclear. Whether the DCP allowance is pensionable has been the focus of several test cases and this still has some mileage to travel.

Of course, SFRS could take a cautious approach and assume that it will be pensionable and put the increased costs up front. The employer's contribution rate in the FPS of 24% makes DCP considerably more expensive and most likely accounts for the reversal of DCP stations to WDS as mentioned above.

However, the Government Actuary Department (GAD) has been asked to look into options of offsetting some of these pension costs. In its analysis, it arrives at a worst case scenario of DCP providing a £600m pension liability on Firefighter's pension schemes.

Whatever the outcomes of the many test cases, it is unlikely that the Government is going to stand idly by, whilst brigade after brigade introduces DCP in greater numbers, increasing the likelihood bigger and bigger pension deficit.

In practise

Assuming that SFRS accomplishes enough volunteers at inception to get a DCP shift system up and running, it is vitally important to consider whether its longevity can be secured.

In the first instance there are likely to be a number of volunteers reasonably close to retirement. This is due to the current pension robbery being undertaken by the Government through the imposition

of a new CARE pension scheme on current employees. Several people may try to offset their losses by enduring a stint on DCP.

SFRS have not recruited for a number of years and are unlikely to, before any DCP scheme is introduced. This will mean that the DCP shift system will act like a revolving door of current employees escaping the brigade leaving a large deficit of experience and skills.

Once the exodus of personnel with final salary pension schemes has exhausted the current pool, SFRS will then probably have to recruit to DCP. Again this will produce a revolving door effect of personnel recruited onto WDS shifts via DCP. With a very limited profile of persons able to commit to DCP will eventually leave SFRS with a very narrow demography of employee.

Another practicality that needs to be considered for DCP will be the decrease in output for those workers. Any incidents attended during non positive hours will need to be deducted from the normal working day. This is why it has been more practical in other brigades, where the call numbers of DCP stations are much lower than at any of SFRS's WDS stations.

A result may be that due to hours spent at incidents (barn fire season in particular), the majority of working time allocated to the positive hours will get written off. This may cause difficult division between employees on each duty system but will certainly reduce output in CFS, BFS and risk activity work that can be completed by DCP personnel. Prevention, protection and education now the primary focus of FRS as outlined in the National Framework, the Government response to Ken Knight's "Facing the Future" report and SFRS's own IRMP document, means that the introduction of DCP will seriously dent this output.

#### Capital investment

This section has highlighted many uncertainties for the future of DCP as a shift system and also many practical disadvantages of the system, in particular in regard to Shropshire. With such a diversity of negative aspects against DCP, if SFRS still persists in pursuing DCP it needs to be mindful of the capital expenditure needed to set up DCP.

DCP requires personnel to live at the station for long periods of time. To enable personnel to do this will require considerable renovation or building at one of the three sites at Shrewsbury, Telford or Wellington.

Telford Central has of course the most potential for this due to its size and underused capacity. However, as with previous prohibitive estimates of building work at Telford Central, it is likely that such renovation to accommodate DCP will be extortionate.

We understand the philosophy of investing to save and recognise that justification can be made for DCP into the future under these terms. It must be pointed out that any renovation for DCP will be bespoke for that purpose and is unlikely to offer itself for any other purpose.

Therefore it is incumbent on the FA to be absolutely sure before embarking on a project to spend a significant proportion of its £8.5m (and rising) reserves on DCP. The money can only be spent once, but there should be no zeal to fritter it away when there must be other substantial schemes for which

that money could be used. If only to offset a deficit for a number of years would be better use than a failed white elephant.

### Grey to Green BFS

This proposal is a straight forward penny pinching exercise based on exploiting a lower wage scale for a role under Green Book terms and conditions.

This cut will represent only a small amount of saving to the overall budget, but will have a disproportionate affect on SFRS's service provision.

Nobody will question the ability of any individual and the merits of maintaining consistency in Fire Safety, but there are other outcomes that also need to be considered.

Operational firefighters are able to bring their experiences into the department and feed those into, not just the day to day running, but also into the development of policies and future practices.

There is also the benefit of when Fire Safety staff return to operational duties, they bring with them their fire safety knowledge and experience to the operational side. Both of these points emphasise the importance of having experienced, knowledgeable and rounded staff in each discipline within the fire service.

This proposal would also eliminate from the service future senior managers with fire safety knowledge and experience that would be needed to run a FRS with a budget of £20m. It is inconceivable that in advising the Fire Authority, a CFO will not be able to draw from firsthand knowledge, training or experience for a whole department within the brigade.

Another side effect into the future could be redeployment opportunities. With changes to pension schemes that will expect all Firefighters to work until they reach the age of 60, the numbers of people who may wish to explore non operational roles within the brigade is likely to significantly increase. By changing these roles to Green Book conditions of service is eliminating any already narrow opportunity of redeployment in the brigade.

### Reclassifying areas

This proposal is as a direct result of the campaigns fought in the four threatened station areas. Those campaigns quite rightly pointed out that the terminology being used to describe their station area was derogatory to the point of subliminally denuding their worth.

We are pleased that SFRS has listened to this very valid point and rectified the terminology for these areas to Urban, town and rural. It has the ring of previous classifications, which perhaps is no bad thing?

### Operational Response

The six areas for investigation for the period of 20:20 and beyond are a realistic range of forward looking activities for the period.

The first two (Information for Safe and Effective Incident Management and Positive Pressure Ventilation PPV of fires) are specific in their focus and lend themselves to finite projects. Clearly better information and better systems of work that help to secure a more successful outcome of incident and provide greater Firefighter safety should be applauded. Of course, these are not the *be all and end all* to the future of the fire service, but SFRS is taking positive steps by addressing these two aspects.

The third, (New and Emerging Risks) has outlined three areas of focus and therefore similar to the first two will be a finite project in respect of these three areas. However, the overarching nature of this priority is one that needs to be incorporated into SFRS's systems of work to continually analyse any other emerging risks.

The final three (Review of the Services Training Strategy, Effective Performance Management and The 20:20 programme and beyond) are again areas of Risk Management process which needs to be embedded into SFRS's systems of work. This is so that each of these areas/ priority are kept under constant review enabling SFRS to react to future changes allowing it to remain at the forefront of FRS efficiency and high level service provision.

### Duty systems

#### WDS

In describing the current duty systems, SFRS's IRMP document attempts to paint a negative picture of the current Wholetime Duty System (WDS). It also claims that there are four WDS stations. Detaching a WDS fire engine to Tweedale for part of a shift does not count it as a WDS station. Those personnel are clearly based at Telford Central as their normal place of work and as such there can only be three WDS stations.

Describing the WDS system as 2/2/4 is a common misrepresentation. 2/2/3 is more accurate. If a watch starts on Monday morning, the 2 day shifts and two night shifts are spread over a 5 day period ending on Friday morning. To count Friday as a day off after having been at work for nine hours is disingenuous. Friday is not counted as a day off for normal day workers when they finish about 5 o' clock having completed only 7 to 8 hours, why should it be the case for Firefighters?

Declaring that 75% of personnel are off duty at any one time, disregards the fact that there are 168 hours in a Firefighter's week. This is akin to criticising teachers for not being at work during the weekend or school crossing operatives for not being at work at 02.00 hours.

If the public wanted a fire service to be available during normal office hours then using a quarter of the Firefighter workforce would be adequate. In fact as a Trade Union, we would be looking to reduce a Firefighter's normal working week from 42 hours toward 37, the national average.

That the fire service is required to be available for 168 hours each week without fail requires an amount of staff to cover those hours. To paint a critical picture of people necessarily having time away from work is scandalous.



## RDS

The explanation of the RDS system is more accurate until the final paragraph and illustration. The RDS is an onerous and dedicated system which requires personnel to live and/or work within a five minute turnout area. It is no surprise that RDS station suffer a higher turnover of staff.

The statement and depiction intimates that at any time 8 Firefighters are available and that this is an expected requirement. This is not reality, especially during normal working week day hours. Personnel from the Group Support Teams regularly have to fill gaps to make a fire crew up to 4. That RDS fire engines are mobilised with less than 5, and sometimes with only 3 is a huge risk for the organisation and completely contrary to FBU policy.

## Support Staff

Reducing the support staff pay budget appears to be an inspirational aim of this the plan. There are no clues as to how this can be achieved nor areas within the service where an over provision of staff exists or where work being undertaken by support staff could be superfluous to requirements.

It is presumed that the aim over the next 5 years is that when a Green Book member of staff leaves the brigade, their work will be evaluated to see if it can be done differently if at all. This type of evaluation should automatically be undertaken when the opportunity of a vacancy exists. To forecast that £105k of support staff can be eliminated from the budget we would suggest is optimistic.

SFRS has already undergone many years of streamlining and efficiency cuts. After 5 years of Public Value, we would be surprised that there could still be this level of cuts to be made to the support staff budget.