



**Fire Brigades Union Response to
Shropshire Fire & Rescue Service's
Integrated Risk Management Plan
2021-2025 Consultation Document**



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1 Foreword

The Fire Brigades Union represents by far the vast majority of Firefighters both nationally and locally, we are the professional voice of Firefighters and as such provide here our reasoned response to Shropshire Fire and Rescue Service's (SFRS) Integrated Risk Management Plan (IRMP) (2021-2025) Consultation Document.

It is important that the IRMP is owned by the Fire and Rescue Authority (FRA) because it will be (upon approval) their instruction to management how to lead and direct the service, in this case over the next four years. And so therefore we do specifically refer to Shropshire's Fire Authority (SFRA) where direction and decision making is concerned and more specifically to SFRS and its management where implementation and operations are concerned.

In terms of the consultation document itself, there appears to be little by way of specific change proposed. Much of its contents are a continuation of priorities and initiatives already identified or in place. This is not a criticism, SFRS has been through a considerable amount of change due to financial restraints and the need to consolidate and stabilise after any tumultuous period would be advisable. Hereford and Worcester Fire and Rescue Service (HWFRS) have undertaken their IRMP (called CRMP) consultation almost concurrent with SFRS. We have responded directly to that consultation and due to the strategic alliance between both services, we have noticed the similarities but also some of the differences. As SFRS's IRMP runs slightly behind HWFRS we have examined some of those differences in more detail here. Most notably the evaluation of risk is downplayed more in Shropshire's IRMP than HWFRS. We strongly believe this is incorrect. We examine **Risk** and **Demand** later in our document, but the consultation document claims (P25) that risk across the county is "flattening." **Risk** is increasing, it is **demand** has plateaued, but this too has started to increase.

The consultation document does not dwell on the actions and changes over the present period (2015-2020) of IRMP which has included a major changes to the recognised shift systems on wholetime duty system (WDS) fire stations and in Fire Control. Work is ongoing to refine aspects of the shift changes and we will continue to work with SFRS to ensure that all aspects of negotiations work for the benefit of the organisation as well as our members. Good industrial relations in negotiating change lead to sound decision making and thus the best fire service for the people of Shropshire.

In terms of the new period of IRMP, we make the same commitment to do all we can to ensure that the direction of SFRS is best for all concerned. We look forward to working with both management and fire authority members to tackle the many challenges we will undoubtedly encounter during the period.

Kent Hallihan
Brigade Secretary

Simon Morris
Brigade Chair

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2 Introduction

Whether the Integrated Risk Management Plan (IRMP) cycle evolution since its inception in 2004 has improved is a matter overdue for debate. In those early years, IRMPs were annual plans containing consultations of specific proposed changes. Now they cover longer periods and are vaguer, addressing wider-ranging aspirational ideas with a view to leaving options open for FRSs to refine proposals at a later date. One advantage this brings is the legroom for FRSs to adapt to unforeseen changes and other unknowns. The disadvantage though is the lack of definition, purpose and direction. In our view, the lengthening of the IRMP period is understandable, but their divergence from their original purpose undermines their ethos and raison d'être.

Clearly there must be a balance between proposals in IRMPs being specific but not pre-determined. An IRMP must identify, analyse and assess risk with a view to constructing plans to counter and manage that risk. Fire service business does generally evolve rather than dynamically change and therefore much of the IRMP will be re-confirming risks and actions already identified in earlier iterations and to a large extent then, already dealt with; or at least planned for. That does not mean though that the IRMP can be bereft of newly identified risk nor plans to mitigate those risks. This is not a criticism of Shropshire Fire and Rescue Service in its IRMP; it is of the entire sector. Each iteration of IRMP in every service is guilty of travelling this path toward vagueness.

For SFRS, there is mention of some of the changing risk that has occurred over the period of the previous plan, but in our view the opportunity is not taken as it should be to deeply analyse those risks and hence formulate specific plans. For SFRS's current consultation, the previous period which was 2015 to 2020 and subsequently extended till 2021 needs to be fully reviewed. Within that period in terms of incidents, Grenfell Tower, Manchester Arena bombing, Covid 19, 2018 wildfires and more locally, wide area flooding has occurred. Add into this continued central government funding cuts resulting in changes to fire cover arrangements, substantial changes to duty systems, a hostile takeover bid and inspections undertaken by HMICFRS have all had significant impact on SFRS. Further, the wider political situation with the economic fallout from Covid 19, rising unemployment and an uncertain future due to leaving the European Union with Telford being the town in Great Britain with the largest share of exports going to the EU (about 70%)¹, will all need greater depth of analysis and monitoring than that included in this IRMP consultation document.

In this, our response to the IRMP consultation, we will expand further on each of these areas and will also re-iterate our evidenced belief on what a fully funded fire and rescue service should look like in Shropshire as outlined in previous IRMP response documents. Most importantly though, we will unapologetically firstly focus our attention on the largest fire in the UK since World War Two, which claimed the lives of 72 people.

We will of course look to work closely with SFRS in the joint aim in providing the best FRS that we can, this after all is a high priority for our members. In our view the upcoming period will be as difficult as any other period in post war history and all parties and stakeholders need to be prepared for a very challenging time.



3 Executive Summary

In recent years Grenfell, Covid 19, various terrorist attacks, wildfires and flooding have re-confirmed, now more than ever that the fire service is an incredibly adaptable, immediately responsive and effective emergency service. It has suffered chronic underfunding, but firefighting is a broadening vocation which saves lives and livelihoods to the great economic benefit of the country. It is a “go to” service whose effectiveness is being threatened by underfunding. This needs to change with renewed investment and better direction for the future of the fire service and the country it protects.

The rationale for funding is straightforward, but the need for greater national coordination and oversight is equally important, if less obvious. Capacity and resilience need to be improved through investment, but some functions have become derelict and require attention. The most obvious is the vacuum left by the crumbling Integrated Personal Development System (IPDS). In each of the areas we look at in this document, the conclusions reveal the need for an oversight body inclusive of all stakeholders. How this looks in structure should be determined by the sector, but the needs of each area are specific and require expertise.

SFRS (as with all other FRs) has been decimated by cuts. A large part of our response here concentrates on the principle of IRMP, which evidences that SFRS needs to increase its capacity. It needs more Firefighters to ensure availability of fire engines and special appliances across the entire expanse of Shropshire. SFRS also needs more Firefighters to ensure their safety and effectiveness provided to the public by ensuring adequate crewing, that is a minimum of five Firefighters on each and every fire engine, whatever duty system is in place.

To make a robust case for funding it is necessary to demonstrate the impact of fire service work and most particularly its emergency interventions. Measurements of emergency interventions have always centred around negative aspects such as numbers of fatalities and serious injuries, damage and destruction. These key performance indicators (KPI) are required, but more emphasis needs to be given to lives saved, rescues carried out and positive economic impact of saving property and livelihoods.

We examine in our document the future direction of the fire service, direct future risks and other indirect risks such as pay, pensions and governance. There are other stochastic unknowns that may result from, for example, exiting the European Union and the economic impact of Covid 19. Both of these have been highlighted in the consultation document and it is acknowledged that predicting a realistic and reasonable worst-case scenario plan for these events is tremendously difficult. There are however plenty of risks that can be planned for and these are rising in magnitude and therefore support our arguments and recommendations for greater investment and more Firefighters.

Notwithstanding all of the above, we take this opportunity to strongly recommend two remedial actions with regard to the fire cover in Shropshire. The risk identified in previous IRMP in the south of Telford has not changed. The repositioning of the immediate response fire engine back to Telford Fire Station was a cost cutting exercise to remove 4 posts. The risk in the south of Telford remains and an urgent priority for SFRS is to provide funding to re-establish those lost posts and therefore provide immediate firecover in the most needed area of Telford on a full-time basis. Secondly, the none immediate availability of the Rescue Tender was removed in order to remove 8 posts. The reversal of this cut which was entirely based on financial restraints also needs to be reversed.



4 List of Recommendations

Recommendation 1: Commit to further extending the current mental health support systems both in terms of capacity and quality.

Recommendation 2: SFRS should make broad political representations for a centralised oversight body including all stakeholders to assist in the identification, analysis and remediation of large and generic risk.

Recommendation 3: Put in place capacity within the service to produce extensive emergency planning to ensure policies, procedures, training and capacity are all sufficient to deal with all foreseeable fire service incident types.

Recommendation 4: SFRS should make broad political representations for a centralised oversight body including all stakeholders to evaluate changes to policies, procedures, equipment, PPE and training. This should be separate from but clearly coordinated with an IRMP oversight body.

Recommendation 5: SFRS should use its influence to advocate strengthening of fire safety policies and their enforcement.

Recommendation 6: SFRS needs to promote a full stakeholder UKFRS coordinated body to plan and direct FRS response to national emergencies.

Recommendation 7: SFRS should use its influence to seek and secure national funding and agreements to expand the role of the fire service into broader emergency settings.

Recommendation 8: Due to increasing demand and risk SFRS should use the period covered in this IRMP to expand its emergency response provision.

Recommendation 9: When measuring and demonstrating impact, include more emphasis on the positive results of fire service interventions both in terms of lives saved and economic benefit.

Recommendation 10: Early engagement with the FBU to explore working arrangements and incentives within the RDS will be imperative.

Recommendation 11: Recruitment and retention of Firefighters need continued attention to recruit and retain Firefighters working the retained duty system.

Recommendation 12: All fire engines must be crewed with five Firefighters.

Recommendation 13: Specialist appliances such as Aerial Ladder Platforms, Boats, and Rescue Tenders are life-saving appliances and need to be immediately available.

Recommendation 14: SFRS should declare its aim to replenish lost Firefighter posts, including those in other departments such as Fire Control, Training, Protection and Prevention.

Recommendation 15: SFRS should work with the FBU to examine establishment levels in all duty systems to rectify the shortfall resulting in unavailable appliances.

Recommendation 16: SFRS should focus specifically on the needs of Fire Control and continue engaging with the FBU regarding mental health, working patterns and equipment/technology.



Recommendation 17: Engage early with the FBU to seek direction and solutions identified as areas for improvement by the HMICFRS.

Recommendation 18: Use influence to respond to Winsor's report where his observations do not correspond to the experience or vision of SFRS.

Recommendation 19: All FRs, including SFRS should use opportunities to advocate increases to pay for all Firefighters.

Recommendation 20: SFRS should make representations to central government to increase funding to FRs (including for pay) to undertake extra activities.

Recommendation 21: Identify priorities and plans to develop recruitment diversity and workplace inclusion.

Recommendation 22: Discuss with the FBU further details and expectations arising from the proposal "examine ways to reduce the socio-economic costs of fire".

Recommendation 23: Provide further clarity consistent with Firefighter rolemaps on the expectation of SFRS role in reducing "the risks associated with other emergencies."

Recommendation 24: Continue reinvesting in the capacity of the Fire Safety department by employing more FSIOs but also with appropriately high levels of training to ensure vigorous enforcement of fire regulations.

Recommendation 25: Any proposal to alter response standards must only be to improve the existing standard (which in our view is already insufficient).

Recommendation 26: Response times need to record the true time of response. This means from time of call to time the first attendance has physically arrived.

Recommendation 27: Once new or increasing activities, or changes to policies and procedures to deal with climate change are identified, these need to be discussed and where appropriate negotiated with the FBU at the earliest opportunity.

Recommendation 28: Once any new activities, or changes to policies and procedures to deal with partnership working are identified, these need to be discussed and where appropriate negotiated with the FBU at the earliest opportunity.



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Major Events and IRMP

5 Grenfell Tower



Wednesday 14th June 2017 is a dark day in the history of the UK. In the aftermath of the Grenfell Tower fire, politicians and leading fire service figures alike declared the atrocity as a “game-changer.” Despite the regretful terminology, the belief espoused was that things must change; and change for the better for the fire service sector. That this has not substantially been the case some 40 months later is a tragedy in its own right. Most significantly is the lack of action to prevent a re-occurrence, in terms of the numbers of high-rise buildings that to this day are still shrouded in flammable cladding and other building safety matters outstanding as expressed by Lord Porter²:

The LGA will continue to support this work, but the reform of our broken building safety legislation – including the granting of effective powers and meaningful sanctions to regulators - cannot come soon enough, and as the recent HCLG Select Committee report argued, the Government will need to increase the funding available if all fire safety issues are to be resolved.

It is totally unacceptable that government and all other responsible bodies are continuing everyday to risk the lives of residents (600,000 people³), and in the event of another fire the lives of Firefighters, by the scandalous inaction in removing these lethal building additives. This scandal is further compounded and demonstrates complacency by the fire at Manchester Cube in July 2020. Thankfully, no lives were lost but this student accommodation block, wrapped in lethal cladding was rapidly engulfed in flames causing huge destruction.





It cannot go unmentioned, that Grenfell Tower is situated in a very wealthy borough in a very wealthy country, but still social injustice had and continues to have a massive, devastating impact on the origins of the fire and its aftermath. Justice 4 Grenfell and other groups strive for justice and action and are solidly supported by the FBU. “The building safety crisis, which has emerged since the Grenfell tragedy, is having an enormous effect on residents of high and medium-rise

buildings up and down the country. This manifests itself in various ways and is not widely understood.”³

The absence of other voices (or at least their inaudible volume) from elsewhere in the sector and from government is reprehensible.

The bereaved, survivors’ and relatives’ (BSR) suffering continues as do the Firefighters who went into Grenfell Tower at considerable risks, with the sole aim of trying to save life. Many Firefighters and emergency control Firefighters rescued people or helped them evacuate from the building that night. Every Firefighter has suffered from the physical and mental effects of intervening at Grenfell as is often the case at traumatic incidents.

The consultation document (P21) acknowledges the traumatic nature of incidents Firefighters attend and so highlights the need for a robust and comprehensive mental health provision (TRiM) within the Service and later in “valuing our people” (P45) “continue to introduce new initiatives as part of the health and wellbeing plan to support staff psychological and physical health.” The commitment to develop this area is welcome and needed. Firefighters are more than ever prone to mental stress through traumatic incidents and through increased workloads due to cuts.



Recommendation 1: Commit to further extending the current mental health support systems both in terms of capacity and quality.

Returning to the core issue of this document, namely IRMP, the fire service readiness and capability to deal with such a fire as Grenfell Tower is central to the very nature of IRMP. There are two aspects



to this, firstly a retrospective viewpoint; should a Grenfell Tower fire have been planned for prior to the event? And secondly, what impact should it have on IRMPs now?

The first viewpoint is important not from a blame point of view, that will be dealt with elsewhere. But from a lesson point of view in understanding and illustrating an IRMP's core purpose and how, due to lack of coordination and oversight across the sector, fundamental omissions have occurred. There had been enough incidents and signs prior to Grenfell that should have identified to FRSs that the risk of complex high-rise incidents existed and that this risk was very real. Once this first step is undertaken the following analysis of the risk and action plans required to remediate the risk are fundamental to the purpose of IRMP. At the Grenfell Tower Inquiry (GTI), London Fire Brigade's (LFB) IRMP has and will continue to be scrutinised. Whether an individual FRS can realistically accommodate the capacity to undertake research and analysis into every type of incident must now be a question posed in the sector. Of course, high-rise buildings are not only very prevalent in the Capital but are also generally much taller than in other parts of the country. Yet, predominantly rural FRSs such as SFRS do have high rise buildings and their FRSs have much less capacity to plan for it in their IRMP nor the capacity to deal with such an emergency should it occur. An expectation that every FRS can individually and adequately undertake such risk research, analysis and planning is not effective nor efficient methodology. In essence, allowing the FSEC tools to run into obsolescence, the diminishment of fire cover standards and the lack of coordination and oversight to assist and support individual FRSs has meant that IRMPs are now inadequate for their intended purpose. Clearly, SFRS cannot change this alone, but it needs to give voice to the need for greater centralised support to advise and guide FRSs not just in IRMP but in many other areas of planning, learning and probably most importantly; standards.

Recommendation 2: SFRS should make broad political representations for a centralised oversight body including all stakeholders to assist in the identification, analysis and remediation of large and generic risk.

That recommendation clearly relates very closely to and possibly gives part of the solution to the second viewpoint; what impact should Grenfell have on IRMPs now? However, the further lesson needs to be heeded from the experience at the GTI. Even though the sector has changed the nature of their IRMPs to a less detailed plan (as discussed earlier), the same vagueness is not accepted when it is held in scrutiny after a major incident. The expectation at the GTI was that FRSs should identify all foreseeable risk, analyse and plan for that risk. This means extensive policies and procedures. It means robust and transparent training objectives and it means demonstrably a level of capacity to deal with such emergencies. IRMPs are the vehicle to underpin all of these things and should be thorough enough to stand the same scrutiny that LFB endured at the GTI.

Recommendation 3: Put in place capacity within the service to produce extensive emergency planning to ensure policies, procedures, training and capacity are all sufficient to deal with all foreseeable fire service incident types.

Following on from IRMP learning as a result of Grenfell is the specifics of that incident and the lack of coherence to address some of the immediate issues. This is not limited to Grenfell Tower, other incident types, particularly water incidents appear to have only limited learning cycle implementation. An inappropriate reliance by FRSs using operational discretion is becoming endemic and wholly unsatisfactory; this must cease. Conflictingly, some changes recommended by the GTI or implemented



outwith, have been made without proper consideration, evidence or testing; this needs to be done better.

So, for instance, the introduction of potentially copacetic equipment such as smoke hoods on a piecemeal basis in comparison to the NFCC issuing poor guidance on evacuation policies are direct but unfounded reactions to the Grenfell Tower fire. Both of these are wrong for dichotomic reasons, but both resolvable through a sole solution; a collegiate approach throughout the sector determined by an industry recognised body to coordinate, agree and oversee, changes to approach in all these types of instances. Similar to earlier, SFRS cannot make this change alone but should be advocating this.

Moreover, where the Service looks to invest in new, more advanced equipment there must be proper scrutiny which considers the benefits and impact on the service, on its employees and on the community. There are within the consultation document several references to new technology but is not always clear what this refers to.

Recommendation 4: SFRS should make broad political representations for a centralised oversight body including all stakeholders to evaluate changes to policies, procedures, equipment, PPE and training. This should be separate from but clearly coordinated with an IRMP oversight body.

In the early stages of phase two at the GTI, it has very quickly become apparent that the underlying causes of the fire were cost cutting and profiteering⁴ at the expense of safety regulations. Commercialisation and marketisation appear to have had an impact on the attitudes of those who created an environment where Grenfell Tower became a death trap. However, it is the undermining of safety and fire safety regulations that must come under the focus of fire service influence. At the initiation of austerity policies by the Coalition Government, regulations were pilloried as anti-business, blockers to progress, pedantically unnecessary and a root cause to preventing the country recovering from a global economic meltdown. That similar terminology is re-emerging after 40 months since the Grenfell Tower fire demonstrates that the lessons, whereby these regulations are steeped in often tragic experience and consequently designed to keep people safe, have not permanently been learnt.

Firefighters know that it is their training to policies and procedures designed and evolved through experience and learning that is most likely to keep them safe at the most dangerous incidents. We also know that it is fire regulations and enforcement through rigorous inspection regimes along with fire safety education, both delivered by Firefighters, that will keep the public safe. Grenfell Tower demonstrates that too many regulations have been cut or short-cut in the interests of finance and to the detriment of Firefighters' safety and the public's lives, health and wellbeing. FRSs must lend their voice to counter those that advocate the dangerous relaxation of regulations en masse.

Recommendation 5: SFRS should use its influence to advocate strengthening of fire safety policies and their enforcement.

Lastly, it would be remiss whilst using the Grenfell Tower fire to demonstrate ills in FRS's risk planning to not mention the actions of Firefighters at the incident. Those Firefighters and most especially Watch Manger Dowden were held to great scrutiny by the GTI whilst aspersions regarding the integrity of the fire service response and dichotomy in the evacuation/stay put decisions were used to undermine the fire service's reputation and professionalism. It is clear to us that on that dreadful night, our members worked tirelessly, endangering their own safety to rescue as many people as they could. The numbers of lives saved is testament to their dedication and unerring determination to help their community.



That no Firefighters were actually killed at the incident is in fact miraculous, particularly considering the danger many placed themselves in.

6 Manchester Arena

The Manchester Arena bombing inquiry has begun and in the early stages it appears there will be many learning points and recommendations for each of the emergency services. Frustratingly, many of these are likely to not be dissimilar to recommendations from other inquiries or investigation reports.

One specific area that needs resolving is the level of responsibility and involvement FRSs take in responding to terrorist activity. Clearly there was an expectation which was expressed vociferously by Andy Burnham the Mayor of Greater Manchester, that FRS attendance and involvement should have been more proactive at the time. Attendance at terrorist incidents have previously been included in those discussions in broadening the rolemap of Firefighters which are now stalled due to lack of central government funding.

As seen in the response to the Covid 19 pandemic (see below), the fire and rescue service is an adaptable and effective emergency response organisation. Key to ensuring the tri-partite activities were agreed and successfully implemented for Covid 19 was the resources applied to finding solutions to methods of working safely. These are the properly risk assessed policies and procedures underpinned with suitable and extensive training. Response to terrorist activity will be no different, in that significant resources and funding is required to enable FRSs to attend such incidents safely. Any emergency service personnel killed responding to terrorist activity due to lack of training or policies will be unacceptable and not a headline that helps further the work of the emergency services.



7 Covid 19

The global pandemic broadly brings two very important considerations in relation to IRMP. Firstly, the inadequacies of past planning and then the opportunities demonstrated through the UKFRS's reaction to a national emergency.

It is unnecessary here to point the fingers of blame, provided the lessons are learnt and future planning structures are rectified to ensure such negligence is not repeated. The Civil Contingencies Act and the National Risk Register (NRR) are sufficiently established (both well in excess of ten years) to expect that plans and preparations for a pandemic to be significantly more detailed, practised and resourced than they were when Covid 19 gripped the country and forced it into lockdown on 23rd March.

That a global pandemic was consistently very high on the NRR makes the lack of PPE, the lack of training for such an event and the lack of planning and procedures inexcusable. It is important that in recognition of our experience and learning through the Covid 19 crisis that not just the specific lessons of dealing with a pandemic are learnt but also the emergency risk and planning lessons are also learnt. The necessary structures require reinforcement to ensure national coordination and planning. It is not expected that individual FRSs can make these plans in isolation and it is clear to us that the crisis further demonstrates the need for national coordination through a UK wide planning body. Some bodies already exist to some extent in local emergency planning and national resource projects but these clearly need greater coordination, influence and control but through broader participation to ensure that results are delivered in practice and not just in theory. In terms of a fire service response, this requires the formation of a single body to take overriding control and leadership in the sector and to liaise effectively with other agencies.

Covid 19 is the most obvious and best example to make this point, but it is far from a solitary example. Large scale events are occurring on a more frequent basis. In recent years, SFRS as did many other services, dispatched resources to various large scale incidents such as Whaley Bridge, Staines flooding, Yorkshire flooding and Saddleworth Moor. Wide area flooding and wildfires often see not just cross border co-operation, but assistance drawn from far and wide. In each of these numerous incidents, assistance from other services is completely ad hoc and certainly not guaranteed.

Recommendation 6: SFRS needs to promote a full stakeholder UKFRS coordinated body to plan and direct FRS response to national emergencies.

The other lesson learnt from the Covid 19 pandemic was the confirmation that Firefighters in the UKFRS have the agility, skill and professionalism to adapt to a broad range of emergency situations. The opportunity to embed further emergency work within the role of a Firefighter was disappointingly missed when following the successful trials in previous years, either local or national governments failed to commit the extra funding that would be required to implement lasting and beneficial change. However, now that on a national scale the potential flexibility of the fire service has again been demonstrated, it would be a dereliction not to capitalise on this experience. As a second spike approaches, the positive outcomes for the public cannot be underestimated and the long-term future of the UKFRS depends on it.

The tri-partite agreements reached between the employers, the Chiefs (NFCC) and the FBU exclusively brought the following activities temporarily into the fire service remit:



- Ambulance Service assistance: Ambulance Driving and Patient/Ambulance personnel support limited to current competence (Not additional FRS First or Co-Responding)
- Vulnerable persons – delivery of essential items
- COVID-19 – Mass casualty (Movement of bodies)
- Face Fitting for masks to be used by frontline NHS and clinical care staff working with Covid-19 patients
- Delivery of PPE and other medical supplies to NHS and care facilities
- Assisting in taking samples for Covid-19 antigen testing
- Driving ambulance transport not on blue-lights (excluding known Covid-19 patients) to outpatient appointments or to receive urgent care
- Driving Instruction by FRS driver trainers to deliver training for non-Service personnel to drive ambulances (not on blue-lights)
- The assembly of single use face shields for the NHS and care work front line staff
- Packing/Repacking food supplies for Vulnerable people
- Known or suspected Covid-19 Patients: transfer to and from Nightingale hospitals under emergency response (blue light) or through non-emergency patient transfer (not on blue lights)
- Non-Covid-19 Patients: Transfer to and from Nightingale hospitals under emergency response (blue light) or through non-emergency patient transfer (not on blue lights) – this includes recovering and recuperating patients no longer infected with Covid 19
- Delivery of pre-designed training packages on Infection Prevention and Control, including hand, hygiene, PPE 'donning' & 'doffing' guidance and procedures; and supporting the care home staff testing i.e. to train care home staff to train others according to the principle of 'train the trainers.'
- Delivery of pre-designed training packages on Infection Prevention and Control, including hand, hygiene, PPE 'donning' & 'doffing' guidance and procedures; and supporting the care home staff testing i.e. direct to care home staff.

It is also worth noting that these tri-partite agreements were reached and implemented both nationally and locally through FBU structures in extraordinarily short time frames. In this instance of course, government made available to FRSs funding to carry out such activities in the public interest. Surely it remains in the public interest to revisit the activities previously explored under the National Joint Council (NJC) trials. As with many of the recommendations on a national level, SFRS must recognise and use its opportunities and influence to forward this agenda.

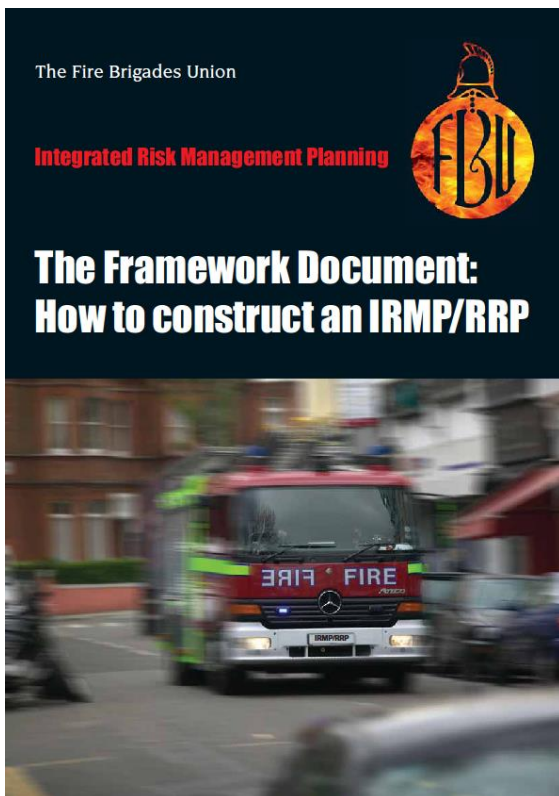
Recommendation 7: SFRS should use its influence to seek and secure national funding and agreements to expand the role of the fire service into broader emergency settings.



8 IRMP theory and application

The consultation document takes some time to explain the methodology used in IRMP. The explanation given in the consultation document is not incorrect, it is however a brief overview version. The methodology is no secret; it is grounded in standard risk management planning cycles. We have included excerpts from the FBU's document "The Framework Document: How to Construct an IRMP" in previous IRMP responses and at length in our "Interim Review of Shropshire Fire and Rescue Service Public Value 2012," when we applied CAST scenario planning theory to SFRS. We replicate just the underlying principles again here:

The FBU IRMP document describes the process through a series of cyclical steps given as such:



Step 1: Scope. Identify all of the issues that are the business of the FRS. Identify all of the internal and external controlling factors that impact upon the FRS.

Step 2: Risk assess each of the issues that are in scope. How likely are they to materialise? How harmful are they? Prioritise them according to overall risk and determine a performance outcome target (the degree to which you would like the risk to be reduced).

Step 3: Develop strategies to reduce the risks. Identify the resources needed to deliver each strategy. Allocate resources according to the degree of risk. Identify the inputs and outputs of delivery strategies – if short term inputs and outputs are achieved, long term outcomes should be satisfactory.

Step 4: Delivery. Remember that people are the most important part of any delivery strategy, so to make sure that the strategies work, consult staff about the practicalities of delivery mechanisms.

Step 5: Monitor the whole process from step 1 to step

4. Constantly look for new risks and changes to existing risks. Monitor performance against inputs, outputs and outcomes.

Step 6: Review the process in the light of performance. Did the strategies deliver the performance outcomes? If so, continue with them, if not; develop new strategies for the next planning cycle.

Finally, but perhaps most importantly, the function of the IRMP process is simply to be honest and to be transparent about the service being proposed. The consultation stage of the IRMP process has to highlight the difference between:

1. True efficiency savings, and
2. Cuts in services that are forced on the FRS, as a result of budgetary constraints.



If providing value for money means providing a lower level of service because fewer finances are available, the IRMP consultation has to say so. It is the only way that the public can be sufficiently informed to make choices about the services they receive, and what they are prepared to pay for them. This is something all IRMPs consistently fail to make clear within their consultation.

Using our evidence-based principles contained within the CAST scenario emergency planning we have in previous responses identified the level of intervention service delivery SFRS should be providing in all locations and levels of service delivery in other departments too. This will be re-emphasised (but with less detail) in the “SFRS Service Delivery” section later in this document.

9 Increasing Risk

The greatest emphasis which applies to FRS planning is **risk**. “Demand” on FRS resources cannot be ignored and largely the UKFRS has changed its emphasis in alternative day-to-day work activities to accommodate the positive fall in demand which occurred over the last twenty years, particularly in regard to fire volumes. However, the **risk** remains and so therefore should the FRS’s capability to respond. Fewer fire incidents does not negate the need to respond with an appropriate speed and weight of attack (which we will look at later), to incidents when they do occur. The capacity to deal with Grenfell Tower needed to remain in place despite declining numbers of fires. The need to be properly prepared for the risk of a pandemic was incumbent on all emergency services prior to Covid 19 and will remain so once the pandemic subsides.

In Hereford & Worcester Fire Authority’s (HWFRA) consultation document there were several areas identified that were expected to increase in risk, an overview of this is displayed in the table below. Shropshire has a smaller population but in terms of geography, demography and socio-economics it is not dissimilar to Hereford and Worcester and therefore the assumptions of increasing risk will equally apply to Shropshire.

Issue	Change to risk
Ageing population	Increasing risk
Single-person household	Increasing risk
Deprivation, poor housing, fuel poverty	Increasing risk
Population increase	Increasing risk
Housing stock increase	Increasing risk
Business growth plans	Increasing risk
Increasing tourism	Increasing risk
Increasing traffic volumes	Increasing risk
Risk of flooding	Increasing risk
Hot weather, drought	Increasing risk
Widespread wildfire	Increasing risk

Expanding on the last increasing risk in the table above (widespread wildfire), the heatwave of summer 2018 provided a glimpse of the future, with some of the worst wildfires in recent years. Firefighters battled to tackle huge wildfires at Saddleworth Moor in Greater Manchester, Winter Hill in Lancashire, Glenshane Pass in Northern Ireland and the Vale of Rheidol in Wales. The south west of England, the West Midlands and Yorkshire also experienced big grassland fires. The Scottish Fire and Rescue Service





issued 21 wildfire danger warnings in 2018. More recent wildfires in Australia and California must also be taken into consideration when SFRS plan for this type of incident and therefore plan for reasonable worst-case scenario.

Further to the risks identified in the table, rising unemployment and re-imposition of previous and new “austerity” measures are likely to have increasing impact on SFRS. The document at p20 remarks of “astute financial planning” and that this “remains a challenge.” The aftereffects of Covid 19 will grip the economy and create a knock-on effect for all public services. Brexit and RDS recruitment and retention are also issues which have the potential to respectively create and deepen financial risk to the service.

In terms of the environment and global warming, electric vehicles and charging points are very commendable initiatives, but more substantively the consultation document (P30) draws from the floods caused by Storm Dennis which affected Hereford and Worcester more than Shropshire. The table (P29) demonstrates a doubling of water rescues and flooding incidents and describes the service as “coping (P30)” with the flooding of 2020. In our view the service was stretched beyond capacity and HWFRA’s consultation document correctly identifies an “increasing likelihood of such high intensity spate activity events.” SFRS must be prepared not just for a recurrence, but also for other similar extreme



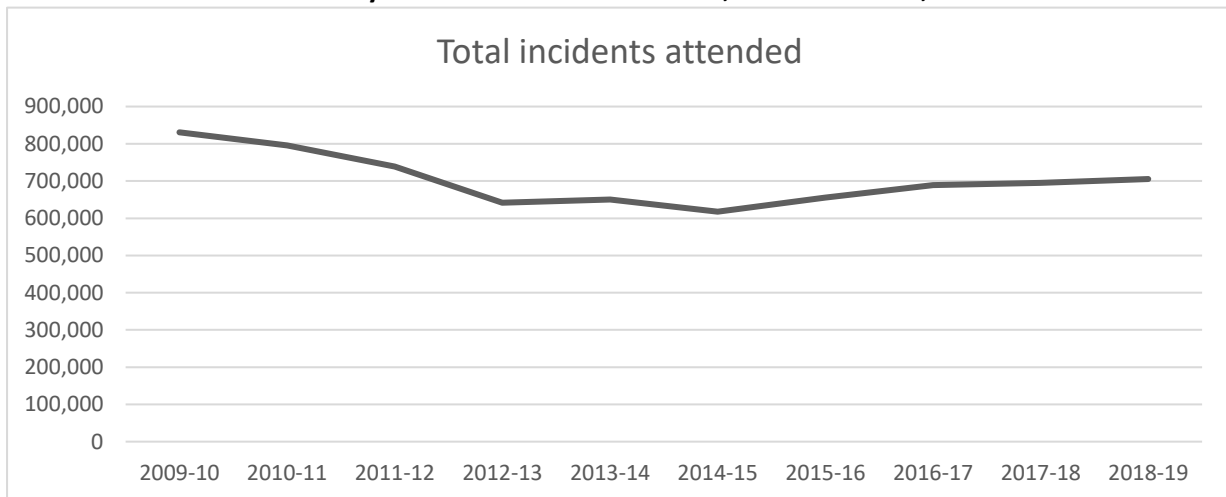
weather events and more importantly must prepare for such events being more severe in future. We are aware that HWFRS was stretched to full capacity in all operational departments (particularly in fire control, on fire stations and officers), meaning there is no room for any further cuts. It means there needs to be an increase to the emergency response availability in Shropshire too. This is reinforced in the HWFRA’s consultation document where it rightly points out (P41), plans for such incidents need to be made whilst still providing business as usual, when it states:

we also have to be ready to respond to large and complex incidents should they happen; for instance, if there is a serious building failure or the impact of an extreme weather event such as wide area flooding. To manage this requires pre-planning, effective response and recovery support for the major incident as well as maintaining the capacity to continue responding to the day-to-day incidents in our area.

10 Demand

Despite the need to plan for **risk**, politicians have tried to justify cuts to Firefighters, fire engines and fire stations (covered below) by pointing to falling **demand** represented through reducing incident numbers. However, as shown in the tables (P21) in the consultation document, total incident numbers since 2015 have been steadily rising. This is consistent with national trends as illustrated in the graph.

Total incidents attended by fire and rescue services, Great Britain, 2009-10 to 2018-19



Clearly, with the rising risk established earlier and evidenced increasing demand in incident numbers nationally as well as locally, the IRMP needs to be making the case for increasing intervention response resources. Whether the budgets exist for this either through central or local funding must not prevent any FRS identifying the need to grow its emergency response model and its associated service delivery.

Recommendation 8: Due to increasing demand and risk SFRS should use the period covered in this IRMP to expand its emergency response provision.

11 Rescues and Positive Impact

In concentrating on demand, the focus tends to narrow toward incident numbers, deaths and injuries. What is often forgotten is that Firefighter interventions at incidents save lives, livelihoods and



property. This is often reported in SFRA papers, but the opportunity to reinforce this message is not taken in the consultation document and does not appear a priority when measuring the performance of the service.

Annually, more than 40,000 people are rescued by Firefighters across the UK. This equates to more than 3,800 rescues a month, or more than 100 rescues every day. Many rescues take place at fires but many more are at non-fire incidents, reflecting the breadth of activities that Firefighters now undertake.

Also often not recorded is the financial benefit of fire and rescue interventions. This is not just the enormous economic impact of saving lives, it is amelioration of the worst effects of incidents. Preventing a business or service from burning to the ground, not only allows that activity to continue, the impact of our positive intervention is also on those working directly within that business or service and the lives they interact with.

Recommendation 9: When measuring and demonstrating impact, include more emphasis on the positive results of fire service interventions both in terms of lives saved and economic benefit.

SFRS Service Delivery

12 Immediate Emergency Response

As stated earlier, IRMPs are not a budget configuration tool although all FRSs use them as this. IRMP should identify the risk through the established process and then remediate and manage the risk. In basic terms, previous IRMPs have recommended a service delivery model based on the risk in Shropshire; conspicuously that in the south of Telford. As we have seen in the previous section, the risk in Shropshire has and continues to increase and not reduce. But, fire cover in Shropshire has not increased during the period of Austerity to match the increasing risk, quite the opposite.

In our “Interim Review of Shropshire Fire and Rescue Service Public Value 2012” response to the Public Value version of IRMP which covered the years 2010 to 2015, we used evidence-based CAST scenario planning to demonstrate the necessary resources that Shropshire needed to provide to counter the risk using safe systems of work. We will not repeat all of those paragraphs here, but the conclusions from that document are replicated in the table below. Please note that we advocate five Firefighters on each fire engine and so the numbers below have already numbers cut from them.



Station	Appliance	Staff	Establishment per watch	Station Establishment
Shrewsbury	RP	5		
	WrL	4		
	Boat			
	ALP	2	16	64
Telford	RP	5		
	ALP	2	10	40
Tweedale	RP	5		
	RT	2	10	40
Wellington	RP	5		
	RT	2	10	40
Total		32	46	184

The reality of immediate emergency response in Shropshire falls well below the level justifiably advocated in the table. The establishment has fallen to 128 on the Wholetime Duty System (WDS) which unarguably has a detrimental impact on the emergency response to the people of Shropshire.

13 Delayed Emergency Response

The majority of Shropshire, in terms of land area, for emergency response is covered by Firefighters who work the Retained Duty System (RDS) and are often referred to as on-call or part-time. They respond from home and work. For many reasons including a side-effect of austerity, the RDS has increasingly struggled to maintain availability levels of fire engines on a national level. Although Shropshire has not been immune to this, it has fared extremely well in comparison to other FRs.

The consultation document (P33) points toward an on-call sustainability project to explore greater flexibility in working arrangements and incentives to bolster availability. Any proposals emanating from this project will need to be negotiated with the FBU.

Recommendation 10: Early engagement with the FBU to explore working arrangements and incentives within the RDS will be imperative.

A crucial factor is pay, and this is covered in the “pay” section later in this document. Shropshire has invested heavily both in terms of time and money into recruitment and retention and this will need to continue and increase if SFRS wants to continue defying the national trends.

The Retained Duty System is a much more difficult system to analyse in terms of numbers of notional shifts. However, there are other indicators such as availability both for individuals (averaged and actual) and fire engines. There is also the establishment level in comparison to recruitment and retention. Cognisant of the demand the RDS places on work/life balance, it is inappropriate to drill down to minute detail, but in basic terms the availability of fire engines staffed by RDS Firefighters (however this may be recorded) is increasingly becoming ever more difficult. This trend is not easy to rectify and will require a great deal of energy and resources; but every effort will need to be made to recruit and then retain as many as possible RDS Firefighters. Decreasing numbers can generate its own acceleration of depletion as the burden of fire cover falling on fewer and fewer Firefighters becomes unsustainable.

Recommendation 11: Recruitment and retention of Firefighters need continued attention to recruit and retain Firefighters working the retained duty system.



14 Capacity and Response

The change in numbers of frontline Firefighters in SFRS is further demonstrated in the table below.

Job losses:

Year	Wholetime	Retained	Control	Total
2010	214	340	19	573
2011	206	339	17	562
2012	197	333	17	547
2013	189	323	18	530
2014	178	325	19	522
2015	167	327	19	513
2016	168	316	18	502
2017	178	336	20	534
2018	174	342	19	535
2019	185	326	20	531
Change since 2010:	-29 (-13.5%)	-14	+1	-42 (-7%)

And more worryingly for the public is the slower response times in Shropshire which are presently more than two minutes slower than in 1999 as shown in the table below.

Response times to primary fires

1999/00	2004/05	2009/10	2014/15	2017/18
7m 54s	7m 56s	9m 34s	10m 02s	10m 16s

There are two key points regarding the purpose of IRMPs that we need to re-emphasise at this juncture:

1. The direct cause of the reduction to fire cover is central government funding cuts since 2010 under the guise of Austerity, despite David Cameron on the eve of the 2010 General Election at Carlisle Fire Station declaring there would be no frontline cuts.
2. The IRMP needs to be honest in its consultation that the proposed service delivery model is insufficient in comparison to the risk.

We have also explained in detail in previous responses and other documentation to the FRA the importance of maintaining 5 Firefighters on all fire engines. We will not repeat previously submitted evidence, sufficed to say that fire engines with insufficient crew not only creates a danger to Firefighter safety because it is impossible to effectively instigate safe systems of work, it also prevents them carrying out their tasks efficiently which in turn hampers them in their attempts to save life. This is compounded by longer attendance times. Other emergency incidents are similar to fires in that their severity increases exponentially with time, hampering attempts to rescue life and putting Firefighters' lives at much greater risk.

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Recommendation 12: All fire engines must be crewed with five Firefighters.

We do recognise the lack of constraints on ourselves in calling for more Firefighters, but it is our responsibility to hold the FRA to account on behalf of our members and for the service they provide to keep the public safe. It is clear that SFRA should include within their IRMP the aspiration to return to a full and appropriate operational response at the earliest opportunity when funding returns. A full and appropriate operational response would ensure that all service assets are available all of the time and so would necessitate an end to jump crewing. Jump crewing requires the practice of recalling Firefighters from the incident ground or other duties, so that other resources such as rescue tenders, aerial appliances or boats can be mobilised. The sheer lack of Firefighter numbers restricts the service's resilience because it relies not only on too few Firefighters, but also that the residual number of Firefighters with these specialist skills become too sparse to maintain coverage and availability. This becomes particularly evident during large scale incidents and spate conditions. It is necessary for SFRS's capacity to be able to respond adequately to large-scale and spate conditions whilst also maintaining a coherent response to normal business. HWFRA's CRMP stated it as such:

we also have to be ready to respond to large and complex incidents should they happen; for instance, if there is a serious building failure or the impact of an extreme weather event such as wide area flooding. To manage this requires pre-planning, effective response and recovery support for the major incident as well as maintaining the capacity to continue responding to the day-to-day incidents in our area.

Recommendation 13: Specialist appliances such as Aerial Ladder Platforms, Boats, and Rescue Tenders are life-saving appliances and need to be immediately available.

15 Other Departments

The Service's plan should also commit to replenishing Firefighters to other posts lost to austerity funding cuts such as Training Instructors and other areas, as it proposes to do with FSIOs. The rationale behind this has already been outlined in our previous document "Interim Review of Shropshire Fire and Rescue Service Public Value 2012." The consultation document proposes to increase FSIOs from nine to twelve and this is welcomed. It is also necessary, as demonstrated in the section above on Grenfell Tower, that it is not just the watering down of regulations that has had a profound effect on building safety; any regulations need a sufficient inspection and enforcement regime.

Recommendation 14: SFRS should declare its aim to replenish lost Firefighter posts, including those in other departments such as Fire Control, Training, Protection and Prevention.

16 Resilience

SFRS's plans should endeavour to make each department and duty system self-sufficient. Resilience of staffing numbers does need to be programmed in, and this should be with regard to cover unexpected shortfalls and not pre-planned ones. If a department or duty system is not self-sufficient, then it can only be viewed as being a shortfall. If this is planned in the establishment numbers then it is a pre-planned shortfall, which is unacceptable. It is unacceptable because by planning in such a way predetermines the use of additional hours of work added to Firefighters' already full working week. This is a risk all FRSs should eliminate.



Absence from shift can be due to training courses, sick leave, pregnancy, maternity, paternity, trade union leave, jury service, compassionate leave and various other reasons. There are too few Firefighters employed to maintain availability of all fire engines and specials in Shropshire

Recommendation 15: SFRS should work with the FBU to examine establishment levels in all duty systems to rectify the shortfall resulting in unavailable appliances.

17 Fire Control

Any Fire Control will have its own staffing issues due to the dependency of the function and the relative low numbers in the department but whose professionalism and vocation keep the department afloat. The function of Fire Control is fundamental to the running of any fire service; this cannot be underestimated nor devolved to another service. Their specific role and professionalism cannot be substituted and therefore they, more than in any other department need to have self-sufficient staffing resilience. We have always maintained that their current staffing levels are not adequate to provide sufficient resilience. We are aware however that Firefighters (Control) have been extremely proactive in making the duty system work for SFRS and this should be recognised.

As already mentioned above, a comprehensive mental health provision is needed within the Service. Due to the stressful environment in Fire Control, Firefighters (Control) can suffer disproportionately with mental health and are often forgotten when critical incident stress debriefs are held. Chronic underfunding since the failed regional control project continues to provide legacy issues with equipment. The FBU advocate progress in all these areas and will work with the Service to ensure Firefighters (Control) are supported in their mental health, working patterns and new equipment/technology. This can only help the service in providing the function and ergo the public.

Recommendation 16: SFRS should focus specifically on the needs of Fire Control and continue engaging with the FBU regarding mental health, working patterns and equipment/technology.

Wider Issues

18 National Structure

Many of our recommendations in this document call for substantial national oversight through a collegiate body including all stakeholders. This may appear doggedly repetitive and tedious but is central to ensuring the future of the service by a system of comprehensive and robust decision-making and implementation. Notably, the National Fire Chiefs Council (NFCC) has tried to fill this void setting itself up as de facto governing body. It presents itself as the authority in the sector but is devoid of substantive input from employers, employees or service users.

The recommendations for such bodies do not hark for a return to the days of the Central Fire Brigades Advisory Committee (CFBAC) although the stability it provided should not be ignored, instead they point to an infrastructure of oversight. The various strands that need coordination need to be linked but also need to be proficient in their field and operation. One area which has become established is the National Operational Guidance (NOG) and National Operational Learning (NOL). Both of these groups have undertaken significant work and sought input from various sources. These groups still need to be developed further to ensure inclusion and full engagement in the sector. Achieving status

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as a recognised oversight body for the NOG should also assist to ensure that all FRSs recognise and implement its output which then would be universally agreed. It is an anathema that individual FRSs chose to undermine the work of the NOG by diluting incorporated safety measures to the detriment of Firefighter safety.

One area within the sector which has been scandalously neglected is within the field of training, development and progression. The desertion of funding and support to the Integrated Personal Development Scheme (IPDS) has led to its collapse and has left a vacuum. The investment and input that IPDS received for it to be implemented was huge and is a travesty to allow that investment to slip to nought through lack of continued support and direction. Such a travesty could have been avoided through better coordination and direction from a properly constructed oversight body.

There are examples where insular decisions and recommendations by the NFCC have been erroneous. We have already mentioned their interim high-rise guidance and alluded some complicity for the lack of national preparation to the Covid 19 pandemic despite its prediction on the NRR for many years. Their misdirection recently with regard to PPE and BA face masks cannot be ignored. By including all stakeholders in an oversight body, to seek and agree forward progress for the sector, can only be to the benefit of all concerned.

It is important to include here the establishment of the inspection body under the Home Office; Her Majesty's Inspectorate of Constabularies and Fire and Rescue Services (HMICFRS). The removal of standards of fire cover, the disbanding of the CFBAC and dilution of many national standards, policies, procedures etc have left many FRSs taking independent routes in many spheres. The introduction of HMICFRS presumably will compare performance of FRSs against various standards in each sphere. The HMICFRS should further support coordination in each of these spheres, through national oversight bodies coordinating and directing the agenda in each of these spheres with HMICFRS as a scrutiny body to measure performance and implementation against nationally recognised and agreed professional standards.

As with all FRSs, HMICFRS have identified several areas to address in SFRS. These are not developed in any great detail in the consultation document, but similarly to our position on national oversight, this needs to be replicated on a local level. To achieve the most effective and efficient outcomes to address the areas highlighted in the HMICFRS report will require close engagement with the FBU and we look forward to early engagement in all of these areas.

Recommendation 17: Engage early with the FBU to seek direction and solutions identified as areas for improvement by the HMICFRS.

The presence of Winsor's report supposedly based on the outcome of HMICFRS inspections cannot be ignored here, despite response to that report nationally by the FBU. Without repeating our grave concerns about several aspects of Winsor's report which did not reflect reality within the UKFRS in many important areas, it is important for SFRS that the political narrative expounded by Winsor's report does not become accepted wisdom. Many of Winsor's conclusions, not based in evidence from the reports into individual FRSs, will not be beneficial to SFRS nor other FRSs and therefore FRSs should not acquiesce to Winsor's unfounded characterisations.

Recommendation 18: Use influence to respond to Winsor's report where his observations do not correspond to the experience or vision of SFRS.



19 Governance of SFRS

The governance of SFRS and indeed that of Hereford & Worcester Fire and Rescue Service has been a major political story for the three counties' fire services over the period of SFRA's previous IRMP. From our own point of view, FBU policy is a principled opposition to Police and Crime Commissioners (PCC) running fire services. The underpinning principle of greater collaboration between emergency services is a sound theory but a goal that can be striven towards without altering governance. Despite establishing that FRS's remits were more akin to that of the ambulance service rather than Police work, the government proceeded with the Police and Crime Act 2017 which enabled PCCs to take over FRSs and then actively encouraged unwelcome takeover bids.

In the case of Shropshire FRA and Hereford and Worcester Fire Authority (HWFRA) who were both the attention of West Mercia PCC's takeover bid, the ensuing legal wrangle against the business case and then its currency (in parallel to Cambridgeshire) appears to have run its course, culminating in a letter from the Fire Minister Kit Malthouse, advising West Mercia PCC to refresh and resubmit the business case following the delayed election due to take place in May 2021. Barring any further political changes, it is likely that West Mercia PCC will take over governance at some point in 2021.

In terms of the original business case proposals, the estimated cuts to the budget of £4 million claiming to not affect frontline service provision were wholly unfounded, unproven and dangerous, and reminiscent of earlier pledges from the then Prime Minister of "no frontline cuts." We will need to forensically inspect the forthcoming renewed business case to assess whether it has gained any merit in the interim period. It will also be interesting to see how it will take into account the intervening changes that have occurred as a result of the strategic alliance that has since formed between the two services.

As depicted elsewhere in our document, ten years of austerity has already butchered the service provision in both fire services covering the West Mercia area to unacceptable levels and whomever has governance over SFRS in the future needs to invest rather than cut. A new PCC business case advocating further cuts will be met with strong resistance from the FBU.

20 Pay

There is no mention in the IRMP consultation document regarding pay. From the FBU's perspective, we have made extensive efforts in the past decade to move away from the binary viewpoint intimated across the sector that assumes a correlation of increasing pay to fewer Firefighters and therefore less fire cover due to a budget ceiling. We do not accept this and will examine this area in the next section.

But, in terms of risk, the IRMP consultation document does not explore the risk of low pay in the fire service. It is true, all public sector workers have endured falling real term wages in the last decade and may lead to the question why the fire service should be any different? There are two answers to this. Firstly, low pay is already having an impact on the fire service and secondly low pay has had an affect on other services which will read across to the fire service in time without preventative action.

Inspecting the first answer, that low pay is already affecting the fire service, there are a number of ways this can manifest itself, but the underlying consideration here is that emergency intervention is a high risk activity and Firefighters not only need to be well trained, they need to be free of fatigue.



One manifestation of low pay is the necessity of Firefighters to make themselves available for more hours of work. Many FRs introduced Day Crewing Plus or derivatives to combat diminishing budgets in an attempt to shore up fire cover. This is the most obvious, but not the only example of consequence of low pay. Others include excessive amounts of overtime and various resilience crewing systems adding further hours of work to Firefighters who already provide a large number of hours. Diminishing budgets have left FRs no option but to attempt to bridge the shortfall in fire cover relying on Firefighters' good will in their vocation to provide fire cover but also on their necessity to make up shortfalls in wages. The outcome is that Firefighters now are working too many hours and working shifts of too many hours in duration. Their safety, that of their colleagues and subsequently of the public are being put at risk.

The second manifestation of low pay underpins the burgeoning retention issue of Retained Duty System Firefighters. Admittedly, this is a multifarious issue with several factors impacting on the issue, such as societal, demographic and other employment changes, but pay is still an integral part of any situation where attracting and keeping staff is needed. In particular, the retaining fee no way near compensates for the level of commitment in time and disruption to family life that is expected of RDS Firefighters.

Pay in the fire service over the last decade has fallen behind by 13.5% in comparison to the consumer price index (CPI) revealing a shortfall in a Firefighter's wage of £4,000. This needs to be reversed to enable FRs to discourage long dangerous hours and prevent any further exodus from the RDS system.

Recommendation 19: All FRs, including SFRs should use opportunities to advocate increases to pay for all Firefighters.

21 Broadening Role of Firefighters

Introducing pay in the last section, we alluded to the efforts the FBU have made through the NJC to realistically anticipate the future of the UKFRS. This does not need any magnificent insight, reviewing the ever-changing role of Firefighters and the UKFRS over preceding decades clearly tells us that things change, move on. RTCs, prevention and protection activities have been significant additions over the decades and further evolutionary change is inevitable. The IRMP consultation document highlights the shifting proportions of incidents between fires, RTCs and other special services, we expect this to continue. Even with RTCs, technology has overhauled



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survival rates for casualties, but at the same time made such incidents more hazardous and technically difficult for FRSs. This has been and continues to be offset through greater investment in equipment and training and so the UKFRS evolves.

Without predicting any details of what may occur in the future, the trend is evident shown by Home Office statistics that Firefighters have attended more non-fire incidents in recent years in the following areas

- Road Traffic Collisions (RTCs)
- Medical Incidents
- Flooding
- Effecting entry/exit
- Animal assistance incidents
- Hazardous materials incidents
- Suicide/attempts
- Assist other agencies

The role of the Firefighter continues to expand and become more technically complex. However, one example of history should not repeat itself, and that is specifically how RTCs became integrated into the role of a Firefighter. The UKFRS, through its vocation entered this field of work, which exponentially grew to become synonymous with the fire service's role. This though had received no funding or investment for the equipment, training nor professionalism and increasing technical skills of Firefighters.

The UKFRS must recognise that to evolve in tune with ever changing technology and society, budgets and funding need to expand to accommodate the need for new equipment, more training and new skills. Attempts to travel this path have been made through the NJC trials in 2015-17 which have been assessed independently as a success both in terms of outcomes for the public but also in terms of increased efficiency and effectiveness.

On a larger scale, there is no statutory duty for water rescue in England and rope rescue also falls outside the role of Firefighters. Other activities such as missing persons and assisting entry for the ambulance are both activities outside the Firefighter rolemap, and reluctantly carried out by Firefighters in Shropshire. Road safety awareness (P19) is the responsibility of the Police. Multi Agency Targeted Enforcement Strategy (MATES) and joint enforcement with the Environment Agency (both P19) are both activities where FRS involvement need to be restricted to Firefighter's role. Also, the consultation document could easily be misread to imply that SFRS are attending medical emergencies (P18).

Whether Firefighters carry out these and other activities is a matter needing of further discussion. However, the point we need to emphasise here is that the UKFRS is taking on more activities requiring a greater breadth of skills for which the organisation receives no finances. This approach needs to change.

Recommendation 20: SFRS should make representations to central government to increase funding to FRSs (including for pay) to undertake extra activities.



22 Pensions

Pensions are also not included in the consultation document. There are risks of unexpected and imposed increased costs impacting on the general finances of the service and hence service delivery. These risks to some extent lie outwith the FRA's control but nonetheless represent very real threats. This was demonstrated when the government unexpectedly increased the SCAPE rate. This was further impacted by the government revaluation. Both of these events were unforeseen, and both impacted significantly on the FRA's finances and in turn on the FRA's ability to provide its service delivery model. The latter demonstrates the uncertainty of government actions, directly attributed to the detrimental changes imposed on our members with the introduction of the 2015 scheme. Under the current HM Treasury consultation, their proposed imposition of the same scheme or derivative from April 2022 provides all FRSs with a multifarious risk that needs further examination.

Our main concern in the 2015 scheme design is its unsuitability as an occupational Firefighters scheme.



Williams' report demonstrated that in general people will not be able to maintain adequate fitness levels up to the age of 60. Without the capacity to redeploy people in the necessary numbers promised upon the introduction of the 2006 scheme, there now lies an inherent problem. Either personnel will remain on duty with insufficient fitness to carry out the tasks on the incident ground, causing a hazard to themselves, their colleagues

and the public. Or their employment will be curtailed prior to their expected finishing date leaving the service with availability, training and recruitment issues whilst also potentially administering early initiated authority retirements at their own cost.

A further risk, as yet unresolved, is identified in the Williams report that highlights that women Firefighters will disproportionately be affected by the normal pension age (NPA) giving rise to diversity recruitment difficulties as well as potential broader challenge.

As demonstrated by the FBU's legal challenge on the grounds of age discrimination, the introduction of the new 2015 scheme is not built on any sound foundation. That further historic weaknesses have been exposed, for example in the realm of pensionable pay means that there is the potential for further complications to impact on the service which ought to have been considered in much greater depth in its IRMP.

23 Inclusion

Diversity and inclusivity are long standing goals which have stalled. The watering down of equality interventions by the coalition government and the side effect of austerity freezing recruitment to full time employment opportunities has had significant detrimental impact.

The consultation document refers to this area (P15, P45) without any specific proposals. The work undertaken by the Inclusive Fire Service Group (IFSG) commissioned by the National Joint Council (NJC) is recommencing in recognition that there is much work to do both in terms of diverse recruitment and developing a fair and equal workplace. Despite positive steps taken in the past there is also work needed in SFRS to reinvigorate the diversity and inclusion agendas, and this should be seen as a priority.

Recommendation 21: Identify priorities and plans to develop recruitment diversity and workplace inclusion.

Responding to the Consultation Document

24 Managing and Reducing the Risk

In the document, stage two intends to outline the priorities for SFRS for the period covered by the plan. The depth of analysis to arrive at these conclusions is not made clear in the document, however much of it accords with business as usual. There are some areas where work will be developed over the period, but again some of this would be expected as business as usual. There are also intermingled some new areas identified which would be best laid out as identified areas of risk needing further action and therefore outlining the broad scope of an action plan. In our view it would be helpful for these different areas to have more differentiation.

25 Prevention

For the prevention section, the activities outlined will almost certainly already be undertaken by SFRS and in some cases are well established activities in the service. This is particularly so of the first two sections “reduce the number and impact of fire and other emergencies on our communities” and “increase fire safety awareness and behaviour.” The point which appears vague and aspirational is “examine ways to reduce the socio-economic costs of fire.” We would expect it incumbent on FRs to consider this, but the purpose of IRMP is to direct work and actions for the period. This appears to be a fishing expedition. In terms of the activities that may consequently drop out of this examination, we will need further interaction with the service to discuss this.

Recommendation 22: Discuss with the FBU further details and expectations arising from the proposal “examine ways to reduce the socio-economic costs of fire”.

The third section “reduce the risks associated with other emergencies” refers to road safety and water safety neither of which are the primary role of the fire service. Attendance at Road Traffic Collisions (RTC) to perform rescues and making the scene safe has long been part of fire service work and officially recognised in the Fire and Rescue Services Act 2004. Prevention in the realm of road safety is primarily the responsibility of the Police and so it should be made clear that SFRS’s role is only to assist the Police in their initiatives. Water rescue although established in many services is not underpinned by statutory duty and is not within the Firefighter rolemap.

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Recommendation 23: Provide further clarity consistent with Firefighter rolemaps on the expectation of SFRS role in reducing “the risks associated with other emergencies.”

The fourth and final point in the prevention section “reduce the impact of environmental change on our communities” includes two broad statements of activities related to environmental change, namely extreme weather events. These most commonly are flooding and wildfires which is likely to become a greater threat due to climate change and FRSs need to be prepared for this. There is however the possibility that these areas can suffer with mission creep and noting that these points are suitably vague, we would need to reserve further comment until details of specific proposals are forthcoming.



26 Protection

The protection section also describes activities which are established as business as usual. Many of the points identify the activity as “continuing.” Some other bullet points, not precluded with “continue” are also activities we would expect to be firmly established, for instance relating to arson “carry out fire investigations and work with the police and other partners to produce evidence to support the criminal justice process.”

There are two areas that stand out for comment in this section; sprinklers, and Fire Safety Inspecting Officers (FSIO). Sprinklers is a straightforward endorsement and is aligned with historic FBU policy. Sprinklers in themselves are unable to extinguish fires but undoubtedly suppress fire spread which provides vital time for FRSs to deal more safely with fires and for occupants to escape. In essence they are clearly lifesaving protection in buildings which we believe should be retrofitted as well as required through new regulations which are intended for new build. That SFRS concur with the fitting of sprinklers and will promote their introduction is welcome.

Austerity has not only impacted on frontline response it has nationally seen significant reduction in FSIO numbers. Fewer FSIOs result in the worsening of protection in the national building stock and

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puts the public at greater risk. SFRS along with all FRs need to reinvest in FSIOs. SFRS is proposing to increase its FSIO from 9 to 12 which will increase inspection capacity but also as the point intimates, to be more proactive in enforcement which further chimes with the point on FSIO training.

Recommendation 24: Continue reinvesting in the capacity of the Fire Safety department by employing more FSIOs but also with appropriately high levels of training to ensure vigorous enforcement of fire regulations.

27 Response

Unsurprisingly, the Response section of stage two causes us some concerns. The third action states “continually review fire and emergency cover to ensure appropriate provision of resources and crewing arrangements.” This fundamentally does not sit right. The entire purpose of the IRMP process is to carry out this function and not to leave it open ended. The details, plans and proposals would be built on the risk identified in the IRMP which should also give direction to the action plan without determining its outcome. This action point fulfils none of the functions of the IRMP except to describe what the IRMP should itself do. Therefore, it will not be acceptable for SFRS to bring forward changes to emergency cover or changes to crewing arrangements based on this action point. Instead if the purpose of this action point is to carry out extensive research and analysis into risk in Shropshire then, the culmination of that research and analysis should form the basis of the next IRMP document from 2025 onwards.

The next cause of concern is the first action point which states “develop a joint attendance standard with Hereford and Worcester Fire and Rescue Service based on incident type and location.” The stark concern here is that this aspiration appears to not be based on any assessment of risk. The subsequent but equal concern is that the document does not explain the differences between the two services’ response standards nor the previous rationale that must have been used to develop those response standards.

We understand that both services are engaged in a strategic alliance, but in the absence of any risk-based justifications, the motivation to align response standards appears to be entirely based on political machinations.

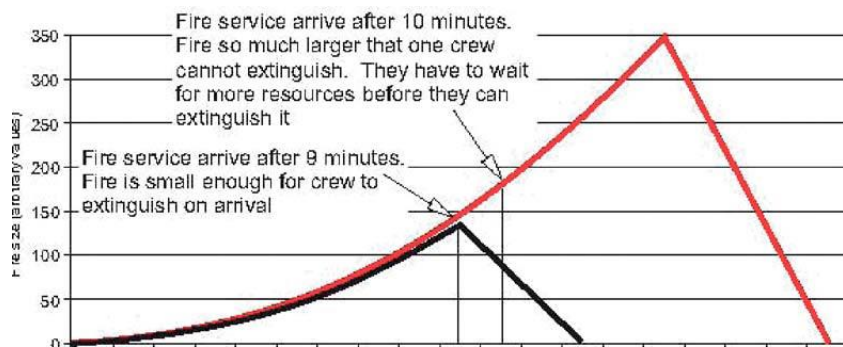
In any instance, we are aware that similar to Shropshire, the risk in Hereford and Worcester has not decreased, but instead for the same reasons as outlined earlier, has increased. Therefore, any changes to response standard can only be justified if they are levelled up. The current attendance standard for Primary Building Fires in Hereford and Worcester is 10 minutes for 75% of incidents. SFRS response standards are shown in the table below though for outward reporting purposes 15 minutes for 85% of occasions is used.

Risk Areas	Life Risk Fires		Road Traffic Collisions		
	Minimum of 5 firefighters in:	Minimum of 8 firefighters in:	Minimum of 5 firefighters in:	Minimum of 8 firefighters and Rescue Pump in:	Rescue Tender arrives within:
High	10 minutes	13 minutes	10 minutes	13 minutes	30 minutes
Medium	15 minutes	18 minutes	15 minutes	18 minutes	30 minutes
Low	20 minutes	20 minutes	20 minutes	20 minutes	30 minutes

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The times in the current response table do not meet the expectations of the FBU. When responding to emergency incident every second is vital. To describe the increased response time of 30 seconds (P22) as “marginal” is dismissive, concerning and undermines the seriousness of emergency incidents. Fires and other emergencies escalate exponentially as shown in the graph. Later arrival of fire engines mean the public are at greater risk and so too are Firefighters as they have to deal with a worsening situation. The consultation document points out that the risk in Loppington is no different from that in Shrewsbury. A 20 (or indeed a 15) minute wait for a fire engine is not acceptable.



The response standard cannot be taken out of context from earlier discussion in this document regarding risk and demand. The nature and status of IRMPs is to evaluate the risk and propose an evidence-based service delivery model in all aspects. In terms of the emergency response, we have already shown that, not only do cuts imposed by Austerity need to be reversed; investment into the UKFRS needs to be further increased to counter growing and divergent risks placed on the fire service as well as growth in demand. Therefore, it would be wrong for SFRS to propose any diminishment of the response standard and any such proposal can only be met with opposition.

Recommendation 25: Any proposal to alter response standards must only be to improve the existing standard (which in our view is already insufficient).

Not included in the response table is a further change (P39) regarding SFRS emergency response standard is the recording of response times. It proposes to measure response times from the point of mobilisation rather than the industry standard of point of call.

As a long-standing key performance indicator (KPI), we are aware of the pressure exerted on FRSs to meet response standards set by those KPIs. This pressure has led to some FRSs seeking ways to mitigate poor performance through various techniques. This is manifested through different opinion on when response times should be recorded from, with some FRSs starting the clock from the point of mobilisation. This negates the call handling part of the fire service response which should be included. Our Firefighters (Control) are professional and proficient at mobilising fire service resources but nevertheless call handling does require time to ensure accurate information is gathered and challenged to ensure a proficient and effective response. Response times need to be recorded from the time of call. Another method some FRSs use to improve attendance times is by encouraging the Incident commander to register the fire engine’s attendance at the earliest opportunity. This has been known to include pre-emptive criteria. Response times need to record the times that the fire engine is confirmed as actually arriving at the incident. KPIs are of course targets to be striven towards, but methods should not be used to obviate their purpose.

Recommendation 26: Response times need to record the true time of response. This means from time of call to time the first attendance has physically arrived.



The two action points “ensure the Service is able to proactively intervene when extreme weather is expected in order to reduce the impact” and “develop further capabilities to respond effectively to the growing environmental impact of climate change – e.g. flooding, wildfire” taken together are what we would expect to be identified in SFRA’s IRMP following the floods in February and March of this year. The FBU has long advocated that FRSs need to be alive to the changing environment and global warming. Importantly here the examples given are steadfastly within the rolemap of Firefighters. There are though areas of environmental change and global warming that may fall outside the Firefighter rolemap. In either case, whether increasing incident numbers or potential broadening the incident response of SFRS, the FBU will need to be closely involved in establishing the appropriate response with suitable policies and procedures. Any potential extra work outside the rolemap will need to be considered in the context of the NJC and pay as discussed earlier.

Recommendation 27: Once new or increasing activities, or changes to policies and procedures to deal with climate change are identified, these need to be discussed and where appropriate negotiated with the FBU at the earliest opportunity.

The last section in Response under stage two, “work with partners to deliver shared response opportunities and assistance” intimates more forcefully that SFRS may expect Firefighters work outside their role. Whatever agreements SFRS seeks or makes with partner agencies will not equate to automatic changes to conditions of service (which includes rolemaps). Again, please see paragraphs above on “pay” and “broadening role of Firefighters.”

Recommendation 28: Once any new activities, or changes to policies and procedures to deal with partnership working are identified, these need to be discussed and where appropriate negotiated with the FBU at the earliest opportunity.

28 Conclusions on Identified Proposals

In conclusion, we will recap some areas covered in the document that we have been able to identify as specific proposals. The particular question regarding the “review of deployment of emergency resources” (p9), referred to as “undertake a focused resource deployment review” (P13) and the third action point in the response section (P43) do not amount to a proposal. As explained above, this is the purpose of IRMP itself and needs justification through the identification of risk. None of this has been brought forward in the consultation document and so SFRS should not be bringing proposals to diminish emergency response within the period of this IRMP.

The proposed new emergency response standard does not meet our expectation. The speed and weight of attack proposed is not enough to deal with incidents in their infancy and so protect the public. The measuring of response times needs to include call handling as part of the fire service response.

Contrary to the suggestion that Shrewsbury’s second appliance could somehow become a peripatetic fire engine (P39) similar to that used at Telford (providing cover at Tweedale) is wholly the wrong direction. The risk in the south of Telford has been established in previous IRMPs and cut back due to funding restraint. The establishment of Firefighters needs to be increased to enable the fire engine to be rightly stationed at Tweedale permanently. The suggestion for Shrewsbury’s second fire engine is further erroneous because the consultation document has made no case on the basis of risk and is not included in the action tables and therefore, we are unclear of its status. Furthermore, the consultation



describes the dangerous practise of jump crewing as “robust response arrangements in place to address water related emergencies” (P29). Clearly these inadequate arrangements would face further diminution if Shrewsbury’s second fire engine is relocated.

We welcome the increasing numbers of FSIOs for which there is a great need, justified through the lessons of Grenfell Tower and changing legislation (P19). There is a need to similarly replenish and expand Firefighters to each duty system and department to provide a comprehensive fire service which could then truly be described as an “excellent level of service that people expect” (P7). Capability and capacity have been eroded by austerity and the level of service is worse now than it was in 2010.

Identifying opportunity for different working arrangements and incentives through the on-call sustainability project will undoubtedly result in the need for negotiation with the FBU. Early engagement with the FBU to guide and shape proposals is advisable for an efficient and satisfactory outcome.

And finally, although there are no specifics regarding expansion of multi-agency working and responding to other emergency incidents, it is important to re-emphasise that not only are these contractual matters which impact on pay and therefore negotiations with the FBU, they are also areas of work which require funding. SFRS need to keep this in context to protect the service we provide and ensure that it evolves in the right direction with both agreement and funding.

29 References

- 1 <https://www.bbc.co.uk/news/uk-england-shropshire-54294082>
- 2 Local Government News. Drive to replace dangerous cladding ‘lagging behind’, warn auditors William Eichler, 19th June 2020.
- 3 <https://www.insidehousing.co.uk/insight/insight/fact-check-how-many-people-live-in-buildings-with-dangerous-cladding-67000>
- 4 The Guardian. Grenfell Tower inquiry: what we have learned since July. 7th September 2020



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