

NORTH WALES FIRE & RESCUE SERVICE

FIRE AUTHORITY EXECUTIVE PANEL REPORT

DATE:	23rd February 2004
REPORT BY:	CHIEF FIRE OFFICER
PURPOSE OF REPORT:	To inform Members of the responses to the consultation on "Having Your Say" the Fire Authority's draft Integrated Risk Management Plan.

1. **INTRODUCTION**

- 1.1 In December 2002 the Deputy Prime Minister made clear that there should be a programme of reform and modernisation of the framework within which the fire service operates. A key element of that programme was the need to produce fire authority Integrated Risk Management Plans (IRMP's).
- 1.2 Members of the Executive Panel met regularly as a working group on the IRMP from June to October 2003. The IRMP was subsequently published for public consultation which concluded on the 31st January 2004.
- 1.3 The purpose of this paper is to summarise the responses received during the consultation period.

2. **RESPONSES**

- 2.1 The Authority received a total of 34 responses to the IRMP. This included responses from 15 current employees and 2 former employees.
- 2.2 Responses were received from the Welsh Assembly Government, North Wales Association of Town Councils, Vale of Clwyd Trades Association, the Countryside Council for Wales, 2 Town Councils, 2 Fire & Rescue Services, an Assembly Member, the British Retail Consortium, BAFE (British Approvals for Fire Equipment) and the FPA (Fire Protection Association) from the fire industry, one Unitary Authority, an estates management company, the Welsh Ambulance Trust and the Fire Brigades Union.
- 2.3 Responses varied in both length and focus with some responders concentrating on just one or two areas of the IRMP.
- 2.4 Responses continue to be received after compilation of this report and outside the consultation period.
- 2.5 The attached table is a detailed breakdown of the issues raised on each of the risks with a response column addressing each area where appropriate.

3. **RISKS**

The following is a summary of the comments received relating to each of the risks.

3.1 Risk 1 – Fire Deaths

- Support for increased Community Fire Safety (CFS).
- Support for utilising retained firefighters.
- Support for utilising non- uniformed personnel for CFS.
- Concern that intervention capability would be reduced before prevention has had time to make an impact.

The FBU's contention that most people die in the early hours of the morning is not borne out from the research undertaken relating to fire deaths in North Wales.

3.2 Risk 2 – Fire & Rescue Service Presence

- Support for increased profile
- Support for increased accessibility

Cautious welcome from FBU, but requiring assurances on security of premises and the effect on core activities.

3.3 Risk 3 – Automatic Fire Alarms (AFA)

- Qualified support for AFA policy.
- Concern over possible delay in attendance for genuine fires.
- Suggestions that charging would be a preferable to a judicious response.

The concerns relate more to the detail of the policy than the need to drive down false alarms. The FBU is concerned for the potential for fire development due to delayed attendance. Members are aware that there is no intention of not responding to a confirmed fire and the policy will fully reflect this. Members are also aware that we are currently not at liberty to charge for AFA's

3.4 Risk 4 – Standards of Fire Cover

- Responses reflected a wish for more information on measuring the new standard.
- Emphasising that intervention was still important.

The FBU consider the general commitment to arrive in the shortest possible time as unacceptable and unprofessional and would rather set "realistic attendance standards". The FBU also stated it was fully committed to helping the Authority to maintain/improve the existing response standards. The Authority believes that there can be nothing more realistic than attending incidents with the nearest available resource in the quickest possible time. Performance Indicators (PI's) are being developed to ensure the continued monitoring of all incident types to maintain the highest levels of service.

3.5 Risk 5 – Shift Patterns

- Support for aligning availability with demand.
- Concern that a change in shift times is not family friendly.
- Support for assessment of part time contracts.

The responses and concerns on shift time changes were generated by employees working the current system and the FBU. Members were able to see that the new shift times will match the peaks in demand and improve response times while removing the disruption personnel currently have in returning to stations during the busy evening period.

3 **RISKS** (continued)

3.6 Risk 6 - Resource Balance

- Support for the review of specialist appliances.
- Support for the principle of call management.
- Enquiries relating to station closures.

There were some general concerns over using alternative transportation to incidents. Areas of detail will be investigated as part of the review and the concerns raised by responders will be taken into account.

3.7 Risk 7 – Arson

- Support for all the proposed actions
- A wish to ensure that fire investigation skills are fully employed

We will make use of partnership working with the Police and other bodies to promote the detection and prevention of arson which will include using the skills of our fire investigators.

3.8 Risk 8 – Structure

- Support from the FBU for the change proposals with continuing negotiations.
- Concern from employees over areas of detail.

Suggestions that the management structure be organic in nature to remain flexible. This view is supported and the effectiveness will be closely monitored to ensure the work of the districts and the centre is cohesive to achieve our objectives.

4. **SUPPLEMENTARY COMMENTS**

The following are more general comments received in the responses which are again covered fully in the attached table.

- 4.1 There was no consistency of response over the control room issue. The FBU wished to see a single stand alone control remain although they wanted to be fully involved in any feasibility study for a joint control. This should be the Authority's intention.
- 4.2 General support for the concept of co-responding.
- 4.3 Support for a change of emphasis from intervention to prevention and community fire safety.
- 4.4 There was a range of responses complimenting the layout and presentation of the plan.
- 4.5 Some of the suggestions for additions to the IRMP have been the specific mention of road safety strategy, the protection of environment and heritage; and equalities issues and diversity of the workforce. These are areas that could be developed further in future IRMP's.
- 4.6 There were concerns from a number of responders that there wasn't enough detail and background data in the plan. However, Members will be aware that each area of the plan is evidence based and to have included all the evidence would have made the plan less user-friendly and strategic in nature.

4 **SUPPLEMENTARY COMMENTS** *(continued)*

4.7 The FBU's response refers at several points to the enhanced risk of challenge that the fire authority may face in respect of the local standards for such things as response times, crewing of vehicles etc following removal of national standards. The FBU is right that there may be increased exposure for the fire authority, given that hitherto it could "hide behind" the national standards. However the Clerk advises that statements by the FBU such as:

- "Any fire authority or principal officer implementing response standards below current national standards, or adopting a policy of not attending or sending reduced attendance to [automatic fire alarm] incidents, will thereby be exposed to potential legal action"; and

- "IRMPs and the consequential redeployment of resources will be in accordance with the new legislative framework only where they deliver improved and not worsened response standards"

are either incorrect or potentially misleading. The Clerk's views is that, as long as the fire authority can demonstrate that it has carried out a thorough assessment based on the evidence, including in the case of its employees a health and safety assessment, it is entitled and it is reasonable for it to adopt different standards and policies from those contained in the previous national standards. This includes the ability to set higher or lower standards in terms of the number of appliances (if any) sent to an incident, the number of crew on each appliance and so on. Given that the IRMP is a high-level document, it is not necessary to include on the face of the Plan full details of the assessments that have been undertaken.

5. **CONCLUSIONS**

5.1 There are a number of areas that received support which included the main principles of the IRMP in the change of focus from intervention to prevention and the Authority's commitment to local communities.

5.2 Broadly the areas of concern revolve around the level of detail of the plan and how the IRMP will impact on individual employees. These areas will be addressed through consultation with the representative bodies.

6. **RECOMMENDATIONS**

6.1 Members note the contents of the report

6.2 Members consider what additions, amendments or alterations should be recommended to the full Authority for adoption in the draft plan.

NORTH WALES FIRE AUTHORITY – RESPONSES TO THE DRAFT INTEGRATED RISK MANAGEMENT PLAN 2003

Risk no./code	
Number	= risk number in the IRMP
O	= future challenges section in the IRMP
C	= comments at fire industry level
T	= comments about terminology
X	= general observations (including some that are not directly related to the IRMP consultation)
Z	= suggested additions

Risk	Comment/Issue Raised	Response	
1	Support for arranging CFS activities around unitary authority boundaries.	The authority's plans relate to using authority-based administrative structures to best advantage – principally in relation to prevention. Response to incidents would not be affected by county boundaries within North Wales.	1.
1	View that county boundaries are poorly arranged geographically (example Llangollen).		2.
1	Whilst accepting that the number of fire deaths needs to be reduced, concern that intervention capacity might be reduced before prevention measures had proven to be effective.	The Authority is committed to maintaining the service's capacity to react to incidents, whilst increasing its effectiveness in preventing incidents. The new flexibility afforded to Fire Authorities encourages better management of the workforce (including working patterns) in a way that makes sense for improved public safety and making the best use of public money. The contention that 'most people die from fire in the early hours of the morning' is not borne out in North Wales.	3.
1	Concerned to ensure that intervention capability is not changed too much before prevention measures have taken effect.		4.
1	Wish to change nothing in relation to intervention arrangements until such time as prevention/protection measures can be proven to provide sustainable improvements to employee safety and safety to the community.		5.
1	Wish to have community fire safety programmes running "in tandem with full intervention for a significant period".		6.
1	Anxiety that crewing levels would be reduced, particularly at night, in order to pursue more community fire safety [at other times]. Assumed criticism of current practice of sending 4 riders on a pump instead of paying overtime to get an additional rider.		7.
1	View that "most people die from fire in the early hours of the morning", and that if intervention resources available at these times were to be redirected to providing prevention work, then North Wales would suffer "fatal consequences".		8.

Risk	Comment/Issue Raised	Response		
1	Support for community fire safety, and willingness for wholetime firefighters to carry out this work during their off duty hours (in addition to part time firefighters and non-uniformed staff).	Within a range of different perspectives, there was general support for finding alternative ways and including a wider range of people in delivering front line services.	9.	
1	Support for using existing staff on 24 hour shift stations to undertake community fire safety (CFS) work.		10.	
1	Support for using retained firefighters to undertake CFS work.		11.	
1	Support for extending CFS activity to include retained personnel working in their own local community.		12.	
1	Support for using retained staff to carry out CFS work because of their local knowledge.		13.	
1	Support for involving retained staff in carrying out CFS work because of their local knowledge.		14.	
1	Wish to ensure proper resourcing of CFS, including any programmes that have been delivered voluntarily until now.		15.	
1	Suggestion that a "well-informed civilian" could provide local fire safety information instead of placing this "additional burden" on retained personnel.		16.	
1	Wish to see a new method of remunerating retained firefighters that would remove the disincentive to reduce fire calls, and which is available to all firefighters on a fire station so as to avoid the possibility of conflict.		17.	
1	Support for bringing in non-operational staff to carry out CFS work.		18.	
1	Support for the proposal to employ non-operational CFS staff, and suggestion that these people could spend time at retained stations, thereby assisting in promoting the stations as centres for the community.		19.	
1	View that the high fire fatality rate in North Wales can be reduced by striking the correct balance between protection, prevention and intervention.		Respondents shared the authority's wish to provide excellent services that represent value for money.	20.
1	Suggestion that the rate of fire deaths is not as alarmingly high as described, but that it has, in fact, remained fairly static despite years of trying to get the fire safety message across.			21.
1	Given the relatively high incidence of deaths from accidental fires in dwellings in North Wales, concern expressed at longer response times in (retained) rural areas.			22.
1	Cautioning against entering into CFS partnerships that might prejudice the impartial and strong public image of the fire service (e.g. commercial franchises).			23.

Risk	Comment/Issue Raised	Response	
1	Suggestion that money would be more effectively spent on public information campaigns as a means of improving public safety than on teams of fire safety officers.	The Authority is committed to using a range of measures to improve public safety.	24.
1	Press coverage should be improved as a means of getting safety messages across. More should be done to improve press relations and reporting.		25.
2	Support for partnerships as a means to achieving objectives (esp. in relation to road traffic accidents)		26.
2	Encouragement to ensure that sufficient resources are made available locally to research and develop the opportunities to work with local authorities.		27.
2	Support for increased public accessibility to the fire stations, but concerns over security and financing of any projects.	Adapting fire stations to make them more of a focal point in the community will be a gradual process that will not be complete until 2008. Detailed planning will be undertaken for each community fire station.	28.
2	Cautious welcome for plans to develop community fire stations, but requiring further information relating to cost, security arrangements, facilities and effect on "core operations" before being able to give full support.		29.
2	Not convinced that staff in drop-in centres would be as effective as staff out in the community.		30.
2	Full support for making fire stations more 'user friendly'.		31.
2	View that fire stations in larger towns have more to do in terms of becoming more integrated into the community, but that this would be worthwhile as a way of tackling socio-economic problems and helping the more vulnerable members of society. However, warns against trying to become involved in areas in which we have no proficiency – to work with other agencies, not instead of them.		32.
2	Request for more precise detail of plans to develop fire stations to raise the service's profile in the community.		33.
2	Request for more precise detail of plans to develop youth schemes (YFA, D of E, etc.), and question relating to whether volunteers will be paid for their contribution, and whether trips and competitions will be funded by the Authority. Support for expanding these youth initiatives.		The Authority is committed to developing its work with young people (principally in order to improve public safety), and considers that all its youth programmes – including Crucial Crew and the YFA scheme - are positive steps in the right direction.
2	Suggestion that expanding Crucial Crew would benefit young people, with knock-on advantages for both fire and ambulance services.	35.	
2	Questioning the cost-effectiveness of YFA units, when an all-Wales run Junior Firefighter scheme might be better.	36.	

Risk	Comment/Issue Raised	Response	
2	View that Community Fire Safety work should be delivered proportionately, based on population numbers.	View noted.	37.
3	Support for a review of policy relating to response to automatic fire alarms (AFAs), but would like to see greater emphasis being put on ensuring correct design and specification of equipment in the first instance.	The authority is clear that this proposal is not about refusing to turn out to genuine calls for assistance, nor is it a cost-cutting exercise. Calls to false alarms put lives at jeopardy by tying up resources unnecessarily.	38.
3	Concern that the fire service might not respond to automatic fire alarm systems. Suggestion that the Authority should adopt a different strategy, so that property owners have an incentive to maintain their alarms : 1st false alarm – turnout, no charge, requirement to seek service from approved contractor, and send copy of certificate of service to the fire service. 2nd false alarm - £200 callout fee, with requirement to seek service from approved contractor (as above). 3rd false alarm – no response.		Although charging for attending false alarms might indeed encourage the owners of alarm systems to ensure that their systems are properly designed, installed, maintained and used, the situation as it stands now is that fire authorities are not allowed to impose such penalties.
3	Suggestion that a system of recovering the cost of attending repeated alarm calls could be investigated.	Furthermore, the Authority has taken the view that it is better to ensure that resources are being put to proper use in the first instance, than to impose charges on anyone (including, for example, hospitals) for having made 'improper' use of its resources.	40.
3	Concern at the risk to individuals from not responding to fire alarms that are considered to be false alarms. Would prefer to see the Authority charging companies for turning out to false alarms. Where changes are required to regulations/laws to allow this to happen, the Authority should press for change through the MPs.		By adopting a system of call management, using the skills, knowledge and expertise of our control operators, the owners of premises can be assured of a measured and judicious response at all times.
3	Concern at the proposal not to respond automatically to calls from AFAs, which could place people at increased risk if they go to investigate the cause of the alarm activation, and crews at risk if they arrive at a fire that has had time to develop due to delay in turning out.	By adopting a system of call management, using the skills, knowledge and expertise of our control operators, the owners of premises can be assured of a measured and judicious response at all times.	42.
3	Suggesting that there are many alternative ways of reducing false alarms from AFAs that would be better than non-attendance, and specifically advocating "attacking the problem at source" (namely, the cause of the false alarm) as a more effective measure.		Furthermore, the Service will continue to offer advice to owners of premises and 'responsible persons' on how to minimise the risks from fire.
3	Concerns that response to AFAs will cease before the managers of premises have been able to demonstrate that they are capable of managing their own systems.	Furthermore, the Service will continue to offer advice to owners of premises and 'responsible persons' on how to minimise the risks from fire.	44.
3	Concern that companies may opt not to install or service automatic fire alarms if the fire service is not going to attend anyway.		
3	Encouragement to develop a real partnership with the commercial sector, and to work with the owners and users of AFAs to improve their management of the equipment.		46.

Risk	Comment/Issue Raised	Response	
3	View that managers and owners of premises will not have sufficient knowledge of fire behaviour to safely establish whether there is, in fact, a fire on the premises when the AFA is activated, which will result in more fire-related deaths and injuries in premises with AFAs.	(See previous response.)	47.
3	View that AFAs are a costly means of responding to fires, and that a cautious removal of response to false alarms from AFAs would probably be successful in that the problem will be returned to the owner/occupier "who is the responsible person in law".		48.
3	Support for the proposal to reduce the number of times that crews are called out to respond to AFA false alarms, but would wish to see a higher reduction target than the 10% put forward in the plan.	<p>The new call management system will be introduced carefully, and reviewed continuously for effectiveness.</p> <p>The 10% reduction target was set following discussion and consideration of the evidence.</p> <p>The Authority does not support the view that continuing to turnout to false alarms is a reasonable way of maintaining retained firefighters' interest in the job.</p> <p>Concerns about the theoretical possibility of a delayed turnout to a genuine fire should be contrasted with the existing possibility that resources are already committed to responding to numerous false alarms.</p>	49.
3	Concern that the criteria for responding to a call for assistance would be based on the <u>existence</u> of an obvious risk to life whereas these might be better based on the <u>likelihood</u> of a risk to life.		50.
3	Support for Authority's view that false alarms from AFAs can in fact be reduced "by positive intervention and expansion of NWFRS Call Management Systems".		51.
3	Support for a system of dynamic ("intelligent") mobilising.		52.
3	Support for call management, on the proviso that call handling does not result in an unacceptable delay in mobilising.		53.
3	View that it would be inequitable to reduce or withhold response to calls to AFAs that are not known to be problematic, and wish to see control operators erring on the side of caution by mobilising a full response in cases where any doubt remains.		54.
3	Enquiring what impact the Authority expects the plan to reduce the number of callouts to false alarms from AFAs will have on retained firefighters, and how it proposes to maintain their interest in the job?		55.
3	Suggestion that by increasing the number of fire safety officers employed, these officers could be used to manage down the demand on the service generated by false alarms from AFAs.		56.
3	Concern that the proposals in the IRMP could expose the service to civil litigation in any case where a poor decision was made not to attend an AFA which later turned out to be a genuine fire.		57.
3	Support for more judicious mobilising to calls from AFAs, but warning that careful management will be required to ensure that implications relating to insurers are taken into account.		58.

Risk	Comment/Issue Raised	Response		
3	Concern that by not automatically turning out to all fire alarms, a small number of genuine fires will be allowed to develop, thereby increasing the risk to property, the public and firefighters.	The new call management system will be introduced carefully, and reviewed continuously for effectiveness. The 10% reduction target was set following discussion and consideration of the evidence. The Authority does not support the view that continuing to turnout to false alarms is a reasonable way of maintaining retained firefighters' interest in the job. Concerns about the theoretical possibility of a delayed turnout to a genuine fire should be contrasted with the existing possibility that resources are already committed to responding to numerous false alarms.	59.	
3	(In relation to expecting confirmation that the fire service is, in fact, being called to attend a fire -) View that the reduction in fire deaths since the 1970s and 1980s can be attributed to the advice given to members of the public to leave the premises and call the fire service out.		60.	
3	View that by waiting for confirmation before mobilising appliances that the fire service is, in fact, required to attend premises where an AFA has actuated, this would give time for a fire to become established and cause more damage to property, present more risk to the people on the premises, and put firefighters at increased risk when they arrived because they would have to deal with a larger fire.		61.	
3	Questioning the accuracy of figures quoted in the IRMP – suggesting that the percentage of false actuations from AFAs is, in reality, lower than 98%.		62.	
3	Disagreeing with the proposals relating to response to AFAs, favouring instead a nationally agreed protocol that would apply across the whole country.		63.	
3	Reminder to provide details of the Service's policy for repeated false calls when dealing with new build premises.		64.	
3	Concern that "call centre staff" may refuse to send fire crews to what they believe to be a hoax call but which may turn out to be genuine.		Challenging suspected hoax calls is now a well established procedure in the control room, and one which has very successfully increased the availability of crews and appliances to respond to genuine calls. The Authority is confident that new local response criteria, meeting the needs of different areas and incident types will mark an improvement on the old standards of fire cover.	65.
4	Wish to see the Service using the discontinuation of national standards of fire cover as an opportunity to improve both the health and safety arrangements for employees and the level of protection afforded to local communities. View that these can be achieved by setting "realistic attendance standards" and "meaningful standard operating procedures".			66.
4	Support for decision not to allocate specific attendance times in relation to new response standards.	67.		
4	New response standards considered to be a positive way forward, which should see an overall improvement in performance.	68.		

Risk	Comment/Issue Raised	Response	
4	View that basing plans for standards of emergency response on a general commitment to arrive in the shortest possible time is unprofessional and unacceptable	The Authority is confident that new local response criteria, meeting the needs of different areas and incident types will mark an improvement on the old standards of fire cover.	69.
4	Acceptance that the old standards of fire cover are outdated; but nonetheless regard speed of intervention as important, especially to fires and emergency special services in outlying areas.		70.
4	Concern that even the current set-up would not be able to meet response times in rural areas.		71.
4	View that the current positioning of stations ensures that a large part of the 'remote rural' areas have a response equal to a D risk category, and that any proposal to remove fire stations would equate to providing a worsened service.		72.
4	Perceived lack of information on improving performance following the withdrawal of the old standards of fire cover.		73.
4	Concern that insufficient staffing may compromise the Authority's ability to adhere to its commitment to the public.		74.
4	Pointing out absence of explanation of the local standards that will be put in place. Need to publish and monitor these standards clearly.		75.
4	Wish to see more detail of the new local standards that will replace the old national standards of fire cover.		76.
4	Suspicion at perceived lack of detail in relation to risk 4.		77.
4	Encouragement to devise a clearly understood standard to replace the old standards of fire cover.		78.
4	Concern that using a benchmark figure to measure attendance time could hide pockets of poor performance. Cynicism that the new standards do not preclude future station closures.		79.
4	View that in the intervening period before new attendance standards and standard operating procedures are adopted, all appliances should be mobilised with at least five members of crew on board, whatever the circumstances.		80.
4	Agreement in principle to the statement in the draft plan that "even a fully crewed fire engine would be unlikely to save the life of a person who had fallen asleep with a lighted cigarette and set the bed and themselves alight, however quick the response", but nonetheless this sentence considered to be an intentional attempt to give a false impression that intervention standards are ineffective as a way of preventing people from dying in fires.	81.	

Risk	Comment/Issue Raised	Response	
4	FBU commitment to helping the Authority to maintain/improve existing response standards.		82.
4	Support for the Authority's existing policy of deploying two fire engines to known property fires.	Noted.	83.
5	Suggestion that all existing 24 hour shift stations could be replaced by less expensive day crewed stations (except Wrexham) without adversely affecting the Service's overall performance.	<p>The mixed response to the proposal to change shift start and finish times on day crewed stations reflects the differences between people who work on those stations and people who don't.</p> <p>It should be remembered that there is no proposal to alter the <i>length</i> of the day shift, nor the pattern of 'four days on, four days off'. The driving force behind this change is not financial – it is about improving public safety.</p> <p>The Authority will undertake a review of its personnel policies to assess the impact of changes on 'family friendliness'.</p>	84.
5	In bringing times of working day into alignment with times of highest demand, enquiry as to whether we had considered abolishing standby time altogether for crews on day crewed stations.		85.
5	Typical day crewing station incident time line makes strong case for change.		86.
5	Full support for the change in hours for the day crewing of fire stations.		87.
5	View that the proposed change to day crewing shift start and finish time does not go far enough. Asks whether wholtime firefighters are indeed needed at all in some stations, whether retained firefighters could provide cover instead, and whether there should be some seasonal variation of wholtime staffing levels. View that the day crewing arrangement is an expensive one.		88.
5	Appreciation of the "good sense" of altering day crewing hours to match incident frequency, but concern that this will not be popular with the affected staff.		89.
5	Concern that the new hours of work for day crewed stations would disrupt existing family routines and reduce the evening time available to spend with family during the four days worked in each eight day period.		90.
5	The change to day crewing shift start and finish times would not be 'family friendly' for employees with young children.		91.
5	Support for changing working hours to match times of high activity, but acknowledgement that it would have an impact on family life. "...were it not for the fact that staff get four days off in eight, this would be a family unfriendly shift".		92.

Risk	Comment/Issue Raised	Response	
5	Pointing out that providing 4 X 24 hrs of cover is very hard and that being on call from home during the evening of those four days helps to alleviate the stresses on family life of this type of shift system. Suggests moving standby hours to later – 08.00 – 18.00 hrs on station 18.00 – 20.00 standby off station (no additional pay for callouts) 20.00 hrs – 08.00 hrs standby off station (additional pay for callouts).	(See previous page)	93.
5	Changes to day crewing shift start and finish times would eradicate quality time spent with the family (particularly in the evening) for four consecutive days and nights, and may be problematic for spouses who may have to rearrange/leave their work to take account of the change.		94.
5	View that the effect on firefighters' home lives of changing start and finish times of day crewing shifts is not justified by the 'minute costing saved'.		95.
5	Later start and finish times for day crewed station shifts are not regarded as family friendly by the crews who would work there.		96.
5	Suggesting that shift start and finish times for day crewed stations should be kept the same to allow time for the measures to reduce fire calls and responses to AFA false alarms have had time to take effect – it may be that busy times will then change.		97.
5	Concern that by having start and finish shift times on day crewing stations that are different from the times of shift changes on 24 hour shift stations, any detachment of personnel from the 24 hour shift station to cover for absent staff on day crewed stations would involve detachments from two consecutive shifts instead of just one.		98.
5	Suggest introducing staged alerters in order to cut down on the number of crews attending the station for small incidents (thereby saving money).		Suggestion noted for consideration as appropriate.
5	Suggesting that the same financial saving as moving shift times for day crewing stations could be achieved by introducing a phased alerter system (so only 6 personnel are paged when one appliance is required – under the current system, it can happen that up to 28 people can be paged for just one appliance).	100.	
5	Suggesting the introduction of phased alerters as a way of saving money, by avoiding having to turn out more personnel than necessary to respond to an emergency call.	101.	

Risk	Comment/Issue Raised	Response	
5	View that the only reason for changing day crewing shift times is to save money and not lives.	Financial considerations were not the driving force for change in the start and finish times of shifts on day crewing stations –changes are designed around the times of incidents and availability of householders for CFS.	102.
5	View that the 'small saving of some £50,000' was not worth the possible detrimental effect from fire on local communities.		103.
5	Concern that changing shift start and finish times on day crewing stations will not improve community safety and will result in poorer service at certain times of day.	Officers will continue to be responsible for ensuring that station work plans are completed.	104.
5	Stating that as the additional evening call-outs for day crewed stations are to secondary fires and AFAs, (which can be reduced by other means), changing shift start and finish times at these stations is not the way to go about improving attendance times.		105.
5	Responding from home (standby hours) in the late morning rather than in the early morning may take longer due to traffic problems.		106.
5	Dissatisfied that wholtime firefighters working on day crewed stations will receive less money for providing the same number of hours cover under the new system.		107.
5	View that changes to day crewing shift start and finish times would not improve protection to the community.		108.
5	Concern that day crewed stations will struggle to maintain links with schools in their area if they started their on-station shift later.		109.
5	Concern that by moving day crewing shift start and finish times, there may be problems relating to time management – some of the tasks currently undertaken during quieter times of the day would in future need to be fitted in during times when more calls are coming in.		110.
5	Concern that later start and finish times for shifts on day crewed stations will mean that less time is available for crews to undertake fire safety work.		111.
5	Encouragement to liaise with all stakeholders to ensure any proposed changes are appropriate to local circumstances.		112.
5	Envisaging a number of resignations following the change of shift start and finish times on day-crewed stations due to lower remuneration levels.		Noted.
5	Concern that changing start and finish times for day crew shifts would lower morale and make these employees less productive.	114.	
5	Concern that proposed changes to shift start and finish times might cause difficulties in recruiting retained firefighters.	115.	

Risk	Comment/Issue Raised	Response	
5	Suggesting that young mothers will not accept being away from their children in the evenings, and that changes to day crewing shift start and finish times would deter women from joining the service.	The Authority strives to provide equality of opportunity for all its employees.	116.
5	Concern that changed hours of day-crewed stations would impact negatively on the hours that cooks work. May entail having to find evening childminders for some cooks with young children.		117.
5	Support for part-time firefighter contracts (paid by time on duty not by number of incidents) for retained staff, or for wholetime staff who have reached retirement age and wish to continue in a less intense capacity.	Recent changes at national level mean that Fire Authorities have now been afforded greater flexibility and autonomy than before to find appropriate ways of delivering their services to the public. The Authority anticipates being able to make good use of this additional flexibility. As part of the IRMP, it will be assessing the effectiveness of offering new part-time contracts to firefighters so that remuneration would no longer be dependent on numbers of incidents (see Risk 5, second proposed action).	118.
5	Advising that new part-time firefighter contracts will need careful implementation to avoid having a diminished part-time firefighter establishment.		119.
5	Asking whether the Authority proposes to introduce fixed salary contracts for retained (paid for time on duty, not for calls attended).		120.
5	Suggestion that variable crewing at 24 hour shift stations should be assessed for feasibility and effectiveness.		121.
5	Use of wholetime firefighters for retained duties and introducing a system of nucleus staffing should be considered as ways of overcoming staff shortages in some retained stations.		122.
5	Support for introducing alternative contracts for salaried part-time (not retained) employees, with income based on the number of hours worked (including on CFS), instead of on the number of calls attended. This would remove the perverse incentive to maintain or increase the numbers of emergency calls. It would also allow more accurate budget predictions to be made, better planning of staffing levels and improved management of staff development.		123.
5	Encouragement to seek out alternative working patterns - for example, seasonal work to assist during only some times of the year		124.
5	Wish to ensure that changes to working arrangements ought to be made only following negotiations and agreement with the FBU.		125.
5	Statement indicating that if no agreement can be reached between the FBU and the Authority on the specific issue of changing shift start and finish times for day crewed stations, then this would be referred to the Technical Advisory Body for its consideration.	126.	
5	Quoting government graphs that "show that more people died (between) 0800 and 1200 than (between) 1800 and 2200" as justification for retaining the current day crewing shift times.	Statistics relating to the times when calls were received to attend incidents involving accidental fire-related deaths in North	127.

Risk	Comment/Issue Raised	Response	
5	Concern at the proposal to change the start and finish times for day crewing shifts. Under the impression that day crewing hours were designed to match life risk in industry and commerce. View that fire deaths occur mainly between midnight and 6.00 a.m., meaning that logically more staff should be available during those times.	Wales do not bear out either of these views.	128.
6	Posing the question of whether there is any intention to close fire stations and remove appliances in 2004/05?	The performance of fire stations will be reviewed for effectiveness in light of the new performance criteria in December 2005 (see risk 6).	129.
6	Enquiry relating to when the location of fire stations will be reviewed and whether full consultation would be undertaken with the surrounding communities.		130.
6	Asking whether there are any proposals to re-site the Dolgellau Emergency Tender.		131.
6	Asking whether the Authority envisages closing or re-siting any fire stations.		132.
6	Opposition to any threat to rural fire stations.		133.
6	Raising the point that appliances are required not only for transportation of personnel and equipment, but also for water supply, which may be limited in rural areas. The availability of a water supply should be taken into consideration when reviewing policies relating to routine mobilisation of second fire engines.	These issues will be considered during the planned exploration of alternative means of transportation of personnel and equipment to some incidents.	134.
6	Concern that any introduction of alternative means of transportation of a second crew to an incident might compromise the health and safety of those individuals if the fire engine fails to arrive before they do.		135.
6	Concern that by using alternative transport to incidents, equipment, and – more importantly in rural areas – a water supply would not be available.		136.
6	Concern that alternative transportation to incidents might not meet the expectations of the British public, and would be an inappropriate response to a developing property fire.		137.
6	Anxiety over plans to investigate alternative means of transporting crews to certain types of incidents, with concerns mainly centred on the health and safety of personnel who might find themselves in attendance without the necessary equipment.		138.
6	Support for the plan to examine alternative means of transportation to incidents.		139.

Risk	Comment/Issue Raised	Response	
6	Advocating that careful consideration be given to disposition of appliances. View that using special appliances from other brigades instead of our own would be 'flawed' arrangements.	Comments noted.	140.
6	Supporting review of special appliances. View that some stations are becoming 'over burdened with specialist functions'.		141.
6	View that reviews of the disposition of appliances should be undertaken as part of an ongoing process.		142.
6	Support for a review of the disposition of specialist vehicles.		143.
6	Support in principle for the introduction of a call management system, but on the proviso that the detail should be determined in consultation with the FBU.	Agreed.	144.
6	Lack of clarity relating to the routine mobilisation of a second fire engine – perceived contradiction between risk 4 and risk 6 in this regard.	Comments noted.	145.
6	Concern that the Authority is not making best use of its operational vehicles.		146.
6	Support for the proposed reviews of special appliances and the routine mobilisation of second appliances.		147.
7	Support for measures to reduce incidence of arson.	Partnership working will be a key part of the Authority's future plans.	148.
7	Full support for the arson initiatives.		149.
7	Support for the Authority's proposal to tackle the problem of arson through partnership with others.		150.
7	Suggests adding a proposal to work with the police specifically on the reduction of arson (deliberately started fires).		151.
7	Support for arson reduction measures. View that a general awareness of arson should be high amongst the entire workforce, and that a sufficiently small (sic.) network of investigators with specialist skills would be available to attend sufficient numbers of suspicious incidents to maintain their skills.		152.
7	Concern that fire investigation skills will eventually be lost, as trained fire investigation officers are not routinely mobilised to non-life-threatening fires. Similarly, more senior managers may see a dilution of their operational skills because they would not be routinely mobilised.	The authority will be making full use of its statutory powers under applicable legislation to investigate fires, both to inform	153.

Risk	Comment/Issue Raised	Response	
7	Concern that unless officers with the relevant fire investigation training are routinely deployed to property fires, untrained personnel may not recognise cases of suspected arson, and inadvertently destroy important evidence.	and to reduce the incidence of arson.	154.
8	Support for the proposal to change the structure of North Wales Fire and Rescue Service, and for continuing the negotiations between the service's senior management team and the recognised trade unions to agree a workable solution.	Views noted, and the notion of remaining flexible is welcomed. It is the Authority's intention to fully support the structure, once implemented.	155.
8	Taking issue with the proposal in the management restructure to adopt a 'functional' approach, with central cores of excellence supporting community based teams. Wish to maintain a divisional configuration, each with its own (self-contained) structure that would take responsibility for delivery of services in its own area without necessarily making reference to a central team.		156.
8	Advocating the continued existence of multiple tiers of management within the organisation.		157.
8	View that the Service should put more effort into core front-line services (fire-fighting, RTAs, fire safety, etc.) and reduce the number of more expensive senior ranks. Need to ensure that the changes to the service begin at the top of the present pyramid organisational structure, not at the bottom.		158.
8	Suggesting that the Authority should phase in the re-structuring, only moving forward on the successful implementation of each phase.		159.
8	Suggesting adding a statement that makes it clear that the new organisational structure would be organic in nature and flexible enough to meet future changes.		160.
8	Concern that the proposed restructuring of the service will be too weak to sustain the organisation and general expectations.		161.
8	General support for the management review in relation to the creation of "smaller, relatively autonomous areas" , on the proviso that sufficient resources and strong central support are available to underpin their work.		162.
8	Posing a question relating to who will undertake and monitor retained recruitment when the divisional headquarters cease to exist under the new structure?	This will be undertaken by the human resources function, with local support.	163.

Risk	Comment/Issue Raised	Response	
8	Refuting the reference made in the IRMP to the high ratio of supervisors to wholetime firefighters, on the basis that more are required because supervision of a largely retained workforce is more difficult due to their limited hours on station.	This comparison has been made nationally, including with other largely 'retained' brigades.	164.
8	Refuting the reference made in the IRMP to the high ratio of supervisors to wholetime firefighters, on the basis that retained and non-uniformed staff had not been included in the calculation.		165.
8	The new management structure may be too stressful for area/group managers. Suggesting that we retain a divisional structure, but change to two divisions, each with an area manager supported by three group B managers.	In our experience, our managers are both adaptable and capable. Occupational health services and other support structures are always available for any members of staff who may be experiencing difficulties.	166.
8	Concern that future workloads and training commitments may be too much for divisional personnel. NWFRS should ensure that there are sufficient resources to meet demands.		167.
8	Questioning the wisdom of undertaking a re-structuring of the service at the same time as externally-led changes will put additional strain on the service. Concern that management from the centre will be too remote from the people who will have to cope with the changes to be effective.		The externally-led changes need to be underpinned by an adequate and appropriate management structure, which is one reason why it is sensible for both sets of changes to be introduced concurrently.
8	Concern about career progression within the new organisational structure.	Within the framework of the Integrated Personal Development System, career progression of individuals will link their own achievements and aspirations to the Authority's determination to deliver excellent public services.	169.
8	Support for the flatter organisational structure, but concern that the loss of Divisional Officer posts could be too sudden, without having first ensured that the alternative arrangements are better. Suggest phasing in the changes.		170.
8	Concern that the removal of operational station (or group) managers in the county areas could remove a level of safety, thereby introducing additional risk to the health and safety of staff at an incident, and exposing the Authority to additional risk of receiving Improvement Notices.	Judicious management of retirements has meant that the Authority does not need to regard any sections of its workforce as 'surplus personnel'.	171.
8	Taking issue with the restructuring plans, pointing out that current DOll and ADO posts will be most affected, and that there is unease amongst current post holders regarding what will happen to 'surplus personnel'.		172.
8	Perceived lack of clarity in the proposed management restructure.	Time has been invested in giving information to employees about the restructure (station	173.

Risk	Comment/Issue Raised	Response	
8	<p>Making a case for rethinking the position of the boundary between north and south Gwynedd because:</p> <ul style="list-style-type: none"> o Porthmadog would be outside its council area, thereby causing an anomaly; and o south Gwynedd would be the only area without any wholetime/day crewed stations. 	visits, officer seminars, etc.). Any lingering concerns or questions relating to the restructure from employees should be brought to their managers' attention through the normal routes.	174.
8	Question relating to whether the European Working Time Directive will be taken into account when reviewing the organisational structure.	In relation to the European Working Time Directive, the Authority abides by the requirements of all applicable legislation.	175.
C	Circular letter to CFO's and Firemasters expressing a wish to see a consistent approach being adopted to Third Party Certification in the fire safety industry and for IRMPs to include a statement in support of Third Party Certification schemes (for fire safety systems, fire safety equipment and fire safety consultancy services.)	Comment noted.	176.
C	Pointing out that large multi-site retail outlet operators would support common standards for all four countries of the UK and Rep. of Ireland in order to facilitate planning their policy, training and costs. (Enquiry concerning effect of legal changes at national level on range of existing response and prevention/fire safety policies.) Wish to have common standards applied across UK and Republic of Ireland.	This area is the preserve of legislators, not individual Fire Authorities.	177.
o	Concern that a joint control room would result in a loss of local knowledge and a deterioration in the standard of survival guidance that could be given.		178.
o	Support for the formation of a multi-service joint control room for North Wales as a better solution than a single fire control room for the whole of Wales.		179.
o	View that one fire control for the whole of Wales is the only realistic way forward, and that North Wales should be aiming to provide that service instead of looking at joint or shared usage of a control with other emergency services.		180.
o	Wish to retain a stand alone emergency control room for North Wales Fire and Rescue Service.		181.
		The comments have been noted. The	

Risk	Comment/Issue Raised	Response	
○	Wish to involve the FBU in any study into the feasibility and effects of a joint emergency service(s) control room in North Wales.	Authority is planning to undertake investigations into future options for its Control Room, not to introduce changes at this time.	182.
○	Concern that by having three emergency services in one joint control room, any system failures or disasters would impact on all three.		183.
○	Wish for clarity in relation to the future of the control function in the face of different messages coming from the Fire Authority (investigate shared control in North Wales), the WAG (no amalgamation foreseen) and the Mott MacDonald report (amalgamate fire-fire).		184.
○	General support for co-responding, but would not wish to see the ambulance service being worsened, or dilution of skills through multi-tasking.	The comments have been noted. The Authority is planning to investigate the benefits and disadvantages of such a scheme, not to introduce it at this time.	185.
○	Encouragement to embark on a responder scheme at the earliest in order to save lives.		186.
○	Wish to await the outcome of negotiations about co-responding in a neighbouring fire and rescue service before progressing with any proposals to introduce co-responding in North Wales.		187.
○	Support for opportunity to enhance and develop skills in relation to co-responding, but some concerns about the ambulance service and effects on operational fire cover and CFS initiatives.		188.
○	Support for the concept of co-responding as a means to improving patient outcomes.		189.
○	Support for co-responding, on the basis that it is a common-sense measure.		190.
○	Misgivings about co-responding, and wish to see more research being undertaken into the issues associated with the introduction of such a scheme.		191.
○	Urging caution in relation to proportionate response, on the basis that incidents can turn out to be different from what was understood from the initial report.	Comment noted.	192.
T	Pointing out differences in use of the word 'wholetime' in the IRMP as a descriptor for both day-crewed stations and 24 hour shift stations.	Comments regarding precise terminology	193.

Risk	Comment/Issue Raised	Response	
T	Suggest that under the new regime relating to commercial premises ("legislative" fire safety), the fire service should cease to think in either 'legislative' or 'community' safety terms, and start to apply the term, 'community safety' to the whole field. Regarding the community as including all sectors – commercial and domestic - and bringing economic, environmental and heritage loss within the definition of 'community'.	have been noted.	194.
T	Suggest more careful wording in references to arson and 'deliberately started fires', and adding more description of the fire and rescue service's role in tackling anti-social behaviour.		195.
T	Perceived inconsistency in proposals to 'investigate the feasibility of utilising retained' and 'to utilise the retained'. Encouragement to progress quickly.		196.
T	Suggesting a change in terminology in relation to co-responding, in order to ensure the quickest attendance. Replace the reference to 'simultaneous attendance' to 'simultaneous response'. (p.20)		197.
X	Pointing out that operation of a shift system means that at any given time 75% of the staff on 24 hour shift stations will be unavailable, and 50% of staff on day crewed stations will be unavailable, which they consider wasteful. View that working patterns could be arranged to allow for more of these staff members to be working and available for community fire safety work.	To provide (7 X 24) 168 hours per week: ➤ four watches, each working 42 hrs. (= 168) are employed on 24 hour shift stations. This inevitably means that three out of the four watches will be off duty at any given time (75%). ➤ two watches, each working 42 hrs. (= 84) with 42 hours standby (= 84) are employed on day crewed stations. This inevitably means that one of the two watches will be off duty at any given time (50%).	198.

Risk	Comment/Issue Raised	Response	
X	<p>Comments relating to the proposed management re-structure, made on the basis that it is 'inexorably linked' to the IRMP: Whilst accepting that the document provides a way forward, suggests a review of the evidence to check that the proposals are sound.</p> <p>3.3 & 3.4 – concern at perceived lack of response to questions from FBU.</p> <p>3.5 agreement that additional resources required, and wish to see careful dispersal of resources for best effect</p> <p>3.9 – concern that the main HQ function would not be able to handle the workload that currently passes through divisional HQs</p> <p>4.4 – concern that the existing line managers would not be sufficiently motivated, developed or experienced to be totally effective under the new structure. Pointing out that the 50/50 split workload for officers to undertake fire safety and fire station supervision is different from the 75/25 split that currently exists and the push for additional CFS to be undertaken as part of the IRMP. Which is correct? Taking issue with description of supervisory officer availability – argues that a group supervisory officer is always available if the designated one is not. Concern that the expansion of the headquarters based OSG will not be sufficient to replace the divisional support structure.</p> <p>4.8 Not convinced that there will be sufficient numbers of 2nd call officers available, taking into account time off for leave, rostered days off, sickness, training, bank holidays, etc.</p> <p>Concern that if the European working time directive were to reduce the number of hours worked by flexi duty officers, there would be insufficient numbers to operate the planned structure.</p>	<p>Comments have been noted.</p> <p>The management structure centres around ensuring that the Service can meet its operational and legislative requirements as laid down by Government.</p>	199.
X	<p>Letter from Edwina Hart AM stating that until the transfer of functions relating to the fire service in Wales has taken place, the service should pursue IRMP along the lines of ODPM's guidance, and that the Welsh Assembly Government will comment on the plans for the Welsh Fire Authorities early in 2004.</p>	Noted.	200.
X	<p>Support for the proposed actions relating to increased community fire safety.</p>	Support welcomed.	201.
X	<p>Support for increasing the emphasis on community fire safety to reduce deaths and injuries.</p>		202.
X	<p>General support for the changes being proposed, in the pursuit of improved community safety.</p>		203.

Risk	Comment/Issue Raised	Response	
X	Particular support for the concept of developing the preventive side instead of over-emphasis on intervention.	Support welcomed.	204.
X	Support for the ethos of safer communities.		205.
X	Welcoming the Authority's attempts to achieve its aims through improved efficiencies rather than increasing the burden on taxpayers.		206.
X	Support for the IRMP process, for the draft plan and the first year's objectives, and for the 'sound' approach to risk.		207.
X	Emphasising the importance of multi-agency collaboration on other matters such as land and premises.		208.
X	Full support for the proposals in the draft plan, and enthusiasm for progressing opportunities for joint working (from a neighbouring fire & rescue authority).		209.
X	Support for the principle of risk-based fire service planning and the concept of risk based emergency cover provision.		210.
X	Support for fire prevention and education.		211.
X	Negative and pessimistic view of the IRMP – considered to be unspecific, failing to make improvements to public protection, failing to “make the service any more bearable for retained employees”, failing to achieve savings, failing to convince people that the service is moving forward.	Opinions noted.	212.
X	Inquiry whether increased local focus at station level will result in promotion of retained Officers in Charge to the rank of Station Commander 'A' (previously 'station officer' rank).	Interest noted.	213.
X	View that improved service and greater prevention depend on providing sufficient budget to implement change to the employment system of the retained section of the workforce.		214.
X	View that the rank of station-officer should be re-instated as a matter of urgency, and more paid hours should be allocated to administrative work on retained stations because of the volume of paperwork and the 'computer generated rubbish' that sub-officers have to deal with.		215.
X	View that retained officers in charge should receive more support and financial reward for 'all this extra work' (specifically updating crewing availability levels).		216.

Risk	Comment/Issue Raised	Response	
X	View that insufficient mention of retained firefighters was made in the draft IRMP document, particularly in relation to the 'serious shortfall in the manning of pumps throughout North Wales'. View that the Authority needs to find ways to encourage applications from would-be retained firefighters, in order to improve availability of crews and ensure continuity when senior members of staff retire.	The Authority understands the difficulties in continuously maintaining sufficient crewing levels on some retained appliances, particularly in areas that are remote from centres of employment. However, recent changes at national level mean that Fire Authorities have now been afforded greater flexibility and autonomy than before to find appropriate ways of delivering their services to the public. The Authority anticipates being able to make good use of this additional flexibility. As part of the IRMP, it will be assessing the effectiveness of offering new part-time contracts to firefighters so that remuneration would no longer be dependent on numbers of incidents (see Risk 5, second proposed action).	217.
X	Comment regarding absence of commitment to 'make retained establishment complete' or to ensure flexibility in tackling problems of non-availability of a crew.		218.
X	Following the revocation of section 19, wish to see the service deciding on optimum crewing levels at retained stations (based on risk), and recruiting to this level. Achievement of optimum crewing levels should be a key performance indicator.		219.
X	Wish to see greater flexibility in relation to the hours of availability of retained personnel, abolishing the 100%, 75% and 50% calculations.		220.
X	Suggestion that wholetime firefighters could be used to make up shortfalls in available crews in retained areas (they could undertake community fire safety whilst in the area).		221.
X	Comment regarding absence of any discussion relating to wholetime firefighters undertaking additional retained duties, or retained firefighters being required to cover other stations.		222.
X	Enquiring whether variable crewing levels in response to the range of different calls had been considered, and suggestion that a crew of 3 might be able to provide a first response to an RTA whilst waiting for a fully crewed appliance to arrive from further afield.		223.
X	Encouragement to provide arrangements whereby retained firefighters would be able to maintain their remuneration levels by responding to "all road traffic accidents or responders" instead of a high proportion of calls from automatic fire alarms.		224.

Risk	Comment/Issue Raised	Response	
X	Concern that changes to the fire service at 'the whim of politicians' could result in untold damage that cannot be reversed.	A variety of individual concerns were voiced relating to a wide range of different aspects of the planned changes. The Authority does not underestimate the importance of managing-in the changes well in order to address some of those concerns, and is fully committed to providing excellent, cost-effective services to the public.	225.
X	Concern that the service may diminish and that levels of support will degenerate. Advising that the Authority should proceed with the creation of community safety groups that mirror unitary boundaries (three in each of suggested two divisions) Resource each of these community safety groups in proportion to projected workloads, not as standard one-size-fits-all.		226.
X	Concern that changes would mean that reform of the fire service may not progress at an effective pace.		227.
X	Warning that there are no legal immunities in respect of the new IRMP responsibilities and that failure to deliver improvement could give rise to legal action.		228.
X	Urging caution in managing in all the changes, to avoid alienating an otherwise generally skilled and well intentioned workforce.		229.
X	Perceived conflict between plans to reduce the number of false alarms from automatic fire alarms and the resultant increased availability to attend genuine calls – this having been read as meaning that the number of appliances attending calls at night would be lowered.		230.
X	Suggesting that NWFRS will struggle to implement the changes without firstly setting up working parties to oversee the transitional stages of the planned changes. Also suggesting that there is a need to provide more progress reports to those involved in the day-to-day running of the service.		231.
X	Concern that the demands of implementing changes will be too great for some individuals.		232.
X	Concern that changes would mean that incident command may be adversely affected.		233.
X	Concern that changes would mean that the service may not comply with Health and Safety good practice		234.
X	Complaining that the "unreliable" IT system is likely to hinder any hope of smooth transition. Advising the Authority to identify and resolve problems with the IT system, seeking specialist advice if necessary.	IT systems are continuously reviewed and improved.	235.
X	Suggesting that additional investment should be made on technology that would allow easier updating by electronic means of availability of retained personnel.		236.

Risk	Comment/Issue Raised	Response	
X	View that speed of intervention with correct levels of resources is key to the control of fire spread and the ability to save life at a fire or other emergency incident.	Noted.	237.
X	Support for the proposal to undertake investigations into providing a proportionate response to non-life-threatening incidents; and wish for the FBU to be included in this review.	Support welcomed. Agreed.	238.
X	Liked the presentation and clarity of the plan.	The presentation of the plan has been generally well liked, but these two broadly conflicting views show how difficult it is to find the right balance whereby just enough information is presented, without making the plan overly complicated and difficult to read.	239.
X	"A clear and robust document setting out the proposals for the future."		240.
X	Complimenting the format and user-friendliness of the IRMP – suggest using the same again in future.		241.
X	Complimenting the presentation of the plan.		242.
X	Complimenting the lay-out of the document, and general support for the proposed improvement activities described in it		243.
X	Complaint that the IRMP provided insufficient information.		244.
X	Pointing out the absence of specific detail in the IRMP relating to fire deaths, and providing additional detailed information relating to the number of rescues from fires in North Wales in the past three years, and descriptions of three incidents where AFAs had actuated in Holyhead, Wrexham and Connah's Quay.		245.
X	Wish to have all statistical evidence used as part of the IRMP process made available for public scrutiny.		246.
X	Questions relating to the extent of the Authority's research into incident and response data, notably data relating to providing assistance to other stations, deployment of special appliances and seasonal variations.		247.
X	View that the development of broad-based data sets and risk information should take place before embarking on fundamental changes.		248.

Risk	Comment/Issue Raised	Response	
X	Warning against the adoption of IPDS-based individual training programmes on the basis that vital training may be missed, standards of service may decline and risks to health and safety may increase. (Incorrectly attributes the plan to abandon centralised annual breathing apparatus training to the re-structuring.) Also, pointing out that there is no computer based system to manage development records. Expressing a wish to continue to maintain the existing levels of skill, and ensure that the 'basics' are right first before making changes.	The Integrated Personal Development System is being introduced throughout the UK Fire and Rescue Service as a systematic way of developing individual employees to meet organisational objectives.	249.
X	Pleased to see IRMP being linked with IPDS throughout the document.		250.
X	Pointing out the absence of detail relating to training plans in the document.		251.
X	Enquiry as to level of smoke alarm ownership in the area, as one other brigade area had found that it had lower ownership levels than the published national figures.	Unrelated enquiry.	252.
X	Questioning how the figure of £24,000 had been arrived at in relation to the cost of each YFA unit - if the cost is really this high, suggests finding cheaper (cost effective) ways of reducing risk.	Through a detailed cost analysis of existing provision of Young Firefighter Association units (£24K relates to total, not per unit)	253.
X	View that the service is generally over-sensitive to political correctness.	Noted.	254.
X	Wish to see each local authority in North Wales making arrangements for ensuring that members of the public know who represents them on the Fire Authority.	Noted.	255.
X	Suggestion that there may not be a need for the existing number of fire authority members in the three Welsh brigades, that some of their functions could be given to the Welsh Assembly and the WLGA to conduct.	Noted.	256.
X	Community Council dissatisfied at having received the draft IRMP late – 27/01/04 – and not having had time to properly consider the document.	Noted.	257.
X	View that over £1,000 could have been saved by sending copies of the IRMP out to employees via the internal mailing system instead of by post.		258.
Z	(From a company that procures fire insurance for its portfolio of properties.) Becoming increasingly concerned that minor incidents of arson (e.g. rubbish bins) are increasing, and suggests that the fire service should embark on an education policy to reduce the number of minor incidents.	Noted.	259.

Risk	Comment/Issue Raised	Response	
Z	Pointing out absence of reference to road safety strategy, as recommended in the draft national framework. View that IRMP should be extended to include road safety as part of the overall plan, with increased involvement in partnership working to achieve improvements.	Noted – will be considered for future IRMPs.	260.
Z	Questioning how the European Working Time Directive will affect the organisation.	The Authority will continue to comply with all applicable legislation.	261.
Z	Pointing out that this IRMP does not include details on safeguarding the environment and heritage sites.	Arrangements for safeguarding the environment and heritage are implicit in all the operational considerations.	262.
Z	Pointing out that reference has not been made to existing successful measures to reduce turnouts to malicious false alarms (would-be hoax callers).	The IRMP focuses on areas for improvement, not on past successes.	263.
Z	Shared concern at the difficulty in recruiting and retaining retained firefighters, and wish to see more attention being paid to this in the IRMP.	Noted.	264.
Z	Wish to include a section in the IRMP dealing with retained recruitment and retention.	Noted.	265.
Z	Wish to include a section in the IRMP dealing with firefighter safety.	Firefighter safety is integral to the organisation's daily working.	266.
Z	Wish to include a reference in the IRMP to the Welsh Assembly Government's proposed targets for reducing fire deaths in Wales by 30-50% in five years.	The launch of the draft National Framework for fire services in Wales is awaited.	267.
Z	Statement drawing attention to the FBU's intention to publish plans in the spring of 2004 that set out the process by which the FBU's target of "zero fire deaths" can be achieved.	Noted.	268.
Z	Suggesting explaining the three station staffing patterns (wholetime shift, day crewing and retained) at the very beginning of the document (does not appear until page 13).	Noted.	269.
Z	Suggesting adding explanation of fire prevention activity as well as CFS.	Noted.	270.
Z	Suggesting adding a reference to the Authority's wish for workforce diversity and representativeness to the list of future challenges.	The Authority will continue to strive for a diverse workforce that reflects the community it serves.	271.
Z	Suggesting making reference to the Authority's commitment to increasing diversity amongst the workforce.	Noted.	272.
Z	Suggesting that some specialist jobs might be done better through a (tendered) service level agreement with one of the councils.	Noted.	273.

Risk	Comment/Issue Raised	Response	
Z	Suggesting expanding the plan to include references to the environment and heritage, and to developing partnerships to reduce deaths and injuries on the roads.	Noted for future IRMPs.	274.
Z	Comment regarding absence of plans to purchase vehicles with larger cabs that can carry more firefighters.	Reviews planned relating to getting the right balance of resources to incidents (risk 6).	275.
Z	Suggesting that a partnership with the Ambulance Service would assist in identifying and providing advice to potential fire victims.	Will be included in the review of control room arrangements	276.
Z	Pointing out that the plan makes no reference to Salvage (protection of particular items from damage during firefighting operations – particularly pertinent in the case of irreplaceable or particularly high value objects).	Salvage measures form part of existing operational procedures.	277.
Z	Suggesting that the plan might include a breakdown of the cost of the fire service to each unitary authority.	Noted.	278.