# DRAFT RESPONSES FROM THE FIRE AND RESCUE AUTHORITY TO THE COMMENTS FROM CONSULTEES REGARDING THE RRP DRAFT ACTION PLAN FOR 2008-09

#### GENERAL COMMENTS RECEIVED ABOUT THE RRP DRAFT ACTION PLAN DOCUMENT ITSELF

The Authority was congratulated this year on 'keeping the proposals down to a manageable number', on having a 'most commendable' plan, and one respondent commented that 'The Authority do excellent work and I approve of your draft plan', adding good wishes to 'one of our most important and valuable public services'.

In the main, however, respondents disliked the fact that the document presented only high level descriptions of the proposals, with over half of all respondents complaining that there was insufficient detail. Last year's consultation document was an altogether lengthier and more detailed document, but similar criticism was levelled against that for being difficult to read and containing too many proposals.

Some respondents took their criticism further, accusing the Authority and/or the senior management of the Service of asking the public of North Wales to 'sign a blank cheque', of being 'disrespectful and dishonest' towards its operational firefighting staff, and even of trying to 'con' staff and taxpayers by purposely hiding known details.

Therefore, the Authority's response last year about constantly reviewing the style and format of its consultation document remains valid, with additional words being added this year refuting the comments about disrespecting staff, of blithely increasing costs or of intentionally seeking to mislead anyone.



	Contributor Code	Comment Received	
1.	7003	I have read the Plan with interest. I note you have 4 proposals and I would congratulate you on keeping the proposals down to a manageable level.	
2.	7004	Recently presented with your plan for 2008/09, I must conclude it is most commendable.	
3.	7006	The Authority do excellent work and I approve of your draft plan for 2008-09.	
4.	7043	(The DRRAP) is a document that is poorly thought out	
5.	7043 and 7031	it contains no detail or statistical evidence and is the equivalent of the ratepayers of North Wales being asked to sign a blank cheque.	
6.	7025	It is both disrespectful and dishonest to produce such a document when some of the issues raised and proposals made will have such a far reaching impact on the operational firefighting staff of North Wales.	
7.	7013	I can't help but feel that the chief fire officer and senior management of (the Service) are somewhat trying to con not only its operational employees and all the tax paying residents of North Wales but also the fire authority itself.	

#### **Authority's Response**

Evidently, the consultation document appealed to some consultees more than others. As we stated last year, producing documents that live up to everyone's expectations is probably impossible, but we will certainly take the criticisms on board, and try to design a document that appeals to more people next time.

Last year's consultation document on the full Risk Reduction Plan attracted criticism from some quarters for being difficult to read and containing too many proposals. This year's consultation on the draft annual action plan, (which complies with issued guidance) presented an interlinked set of strategic proposals 'in principle' for stakeholders to respond to.

The financial calculations included within the document are necessarily loose at this stage, but clearly show the Authority's intention to do the very opposite of issuing a blank cheque by paying for improvements from within existing budgets.

In relation to consulting staff, we accept that the document on its own would be insufficient, which is why a series of presentations and personal visits by senior managers was arranged to each watch on each wholetime fire station to discuss the type of action being considered. Staff have had three months to listen, question, air their views and concerns, and respond in writing to the proposals.

Rather than draw up detailed plans first and then present them to staff as a 'done deal', this year's high level proposals have given staff a genuine and unprecedented opportunity to contribute to the shaping of the detailed plans for themselves.

It is disappointing, therefore, that this opportunity should have been misconstrued as an intention to mislead or 'con' anyone, which was clearly not the case.

# **COMMENTS SUPPORTING THE PROPOSALS**

A relatively lower number of respondents - but including both staff and external stakeholders - wrote in to support either the proposals or the Authority itself and the work done by the Service.

	Contributor Code	Comment Received	
8.	7003	(Re Proposal 1.) No one could dispute that this is a vital part of the Fire Service work.	
9.	7003	(Re Proposal 2.) I think everyone would agree with this, not only is it business but more private houses have alarms which cause problems to (the Fire Authority) and to their neighbours.	
10.	7003	(Re Proposal 3.) If Officers are being paid and not used then it makes economic sense.	
11.	7003	(Re Proposal 4.) I would agree with this provided it can be achieved within existing budgets and staff resources.	
12.	7006	I believe that the policy regarding the free home fire safety checks is a very good one and in many instances has already saved lives.	
13.	7007	(Re Proposal 2.) I agree, a more robust policy needs to be in place.	
14.	7007	Officer cover – it would seem valid to review the current levels.	
15.	7018	I fully support the principle of risk-based fire and rescue service planning and the concept of risk-based emergency cover provision.	
16.	7024	The aim of reducing AFAs would save time and money and reduce the risk to members of the public by having fire appliances more readily available for fire calls.	
17.	7060	I cannot fault the contents of the plan.	

# **Authority's Response**

The Authority is encouraged by these expressions of support.

#### COMMENTS DISAGREEING FUNDAMENTALLY WITH THE PROPOSALS

In addition to comments revealing a lack of support for some aspect(s) of the proposals (see later), there were some respondents who disagreed fundamentally with the principles of one or more proposals, whatever the final details might turn out to be.

The main concern related to the source of funding for increased fire prevention activity, with a number of respondents indicating that either additional budget should be made available to the Service, or that efficiencies should be released from any part of the service except where it might affect firefighters employed on fire stations.

The point that the rostering review would relate only to staff based at 24 hour shift and day crewed stations (8 out of 44 fire stations in North Wales) but not to retained fire stations had been missed.

	Contributor Code	Comment Received			
18.	7028 and 7030	reading between the lines I can see that what you are proposing is to cut operational fire fighter jobs in order to fund more office staff. I cannot accept this as a good proposal as it could have a devastating effect on the public.			
19.	7033	There should be no compromise to front line jobs in order to release resources.  The best solution would be to pay for additional activities through an increase in the budget. If this is not possible, any increase should only be what you can afford from releasing funds from sources other than firefighter jobs.			
20.	7018	Despite the fact that little or no information is given as to how exactly the service			
21.	7014	The main point of concern for myself is how running the operational cover at permanent minimum levels will deliver robust levels of confidence in future.			
22.	7025 and similar from 7058	Lear anyone to helieve that more work and performance improvement will be			
23.	7057 and similar from 7015, 7025, 7027, 7004, 7038, 7047, 7054, 7055, 7053  Although I agree that Fire Safety is very important, I do not believe that this should be funded by a reduction in firefightersThis appears to be an irresponsible course of action. Funds needed should come from either an increase in budget or from savings in other sectors of the Fire Service.				
24.	The suggested amount of money to be reassigned to Community Safety by you proposals would appear to be excessively high.				
the funding of the ServiceVisiting premises fitted with automatic fire a allows our crews to establish links with the business community and to a update information for operational consideration. () We should be		(Re AFA policy.)let us not forget that the business community contributes to the funding of the ServiceVisiting premises fitted with automatic fire detection allows our crews to establish links with the business community and to constantly update information for operational consideration. () We should be working in partnership withthese offenders, not creating new levels of bureaucracy.			
26.	7018	I question the principle of introducing a registration programme for automatic fire			

	Contributor Code	Comment Received	
27.	7015	If this RRP had been passed last year, the cost in overtime alone for the day crewed stations would have been in excess of £350,000, which does not include running costs and other hidden costs. Therefore the figure of £750,000 that is being quoted cannot possibly be accurate.	
28.	With the rate at which employeesare carrying out Community Safety ever increasing, the need for additional funding is inevitable. This additional funding		



#### **Authority's Response**

### Rostering Review and Dedicated Response Option

The Authority is committed to the provision of excellent services to the public, and values all members of staff who contribute in a variety of ways to making North Wales a safer place to live, work and visit.

The Authority is also committed to providing value for money for the public of North Wales, and acknowledges that a balance must inevitably be struck between the provision of services and the cost of services.

All authorities are under a legal duty to deliver services in the most effective, efficient and economic way, and to constantly strive to find ways of delivering the best possible service to the public. Furthermore, the Welsh Assembly Government has set a target of achieving £600m per annum efficiency gains across the Welsh public sector by 2010 and authorities in Wales are now expected to find innovative ways to deliver 'more from the same' or 'the same for less'.

The ultimate aim of our proposals is to secure efficiencies without reducing the standard of service delivered to the public, and the terminology of 'shedding' firefighter posts is therefore unhelpful when the proposals relate to maintaining excellent emergency response and prevention work by using a better system for organising resources. There is no intention whatsoever in this draft action plan to reduce crewing levels on fire engines – a point which should provide real reassurance to members of the public.

However, acknowledging the responses from staff who were unconvinced by the two proposals a) to review the rostering of firefighters in eight of the forty-four fire stations in North Wales, and b) to change the way officer cover is provided, the Authority has decided not to proceed until it has had an opportunity to undertake additional research into this area.

#### False Alarms from Automatic Fire Alarms

The Authority's stance on this matter remains the same – that unwarranted and avoidable false alarms increase the risk to those people who get accustomed to hearing them and fail to react quickly, and increase the risk to the general public by having fire service resources unnecessarily committed.

The cost to the Authority and the increased risk to the public of sending emergency fire engines out on average eight times per day when there is no emergency is difficult to justify. Given that there is no legal basis to allow the Authority to charge for these unnecessary callouts, and given that previous attempts to persuade premises owners to invest in their AFA to minimise the chances of them producing false alarms, we feel that a process of registration is a sensible and supportive approach to seeking improvement from premises owners. Distressing references to requiring members of the public to investigate fires, and to recent tragic hotel fires fail to acknowledge that by working with premises owners during the registration process the Service can take the opportunity to both educate and influence those premises owners, thereby improving their understanding of, and arrangements for, securing the safety of people in the buildings for which they are responsible.

#### **COMMENTS NOT IN SUPPORT OF THE PROPOSALS**

The majority of responses – particularly those that were received in the last week of the consultation period – were from staff and a few others who did not support the proposals. The same concerns were aired in most of them, and the fact that the wording was frequently very similar suggests that a degree of campaigning or sharing of responses had occurred.

A number of responses reflected concern that the proposed new rostering system would:

- simply not work, especially on day crewing stations;
- be too costly to set up and run to release anything like the anticipated savings;
- provide less flexibility for the Service than the current arrangements;
- give rise to childcare difficulties for staff;
- be less flexible for staff in terms of making holiday arrangements;
- mean a freeze on recruitment, delaying the achievement of a diverse workforce.

Several made the point that as the Service was already on target to deliver 30,000 Home Fire Safety Checks this year, there was no reason to change.

Doubts were expressed as to whether savings could be made by the introduction of the new rostering proposal. People were concerned that not all additional costs had been considered, including:

- support staff to run the system;
- computer software;
- vehicles to transport staff to fill deficiencies;
- subsistence/mileage claims;
- overtime once all reserve hours have been depleted;
- additional training to multi-skill staff (e.g. for rope rescue, emergency tender, ALP and local risks);
- dealing with spate conditions, seasonal variations and simultaneous events.

Respondents were also concerned that the 'reserve hours' calculation did not appear to have accounted for:

- absences such maternity/paternity leave;
- compassionate leave:
- time to attend external courses and courses at the Fire Service College;
- trade union leave:
- secondments; and
- acting up.

A number also alluded to the experience of other FRSs that have apparently examined and rejected the possibility of a five watch system, and of Greater Manchester Fire and Rescue that has adopted it. They variously report problems in implementing the system – especially for day crewing stations - and of what the respondents perceived to be 'excessive' and 'spiralling' costs associated with overtime payments.

Fewer comments were received relating to the proposal for reducing the number of middle and senior managers on duty simultaneously to provide cover, but some concern was expressed about maintaining command competence and how to close any skills gap caused by the loss of middle managers with specialist skills. Other concerns related to the time it would take to achieve this proposal, especially with the introduction of the new flexible retirement policy. One respondent, not employed on a fire station, complained of not having had an opportunity to discuss the proposals with principal officers.

_	Contributor Code	Comment Received	
29	7046 (& 7013 similar)	It is the general feeling that the whole exercise would be initially more costly and not achieve any real benefits for several years.	
30	7039	(Re the target to deliver 30,000 Home Fire Safety Checks.) If this is the case, we as a service will not provide any additional HFSC in 2008-09 as the service are already reaching this target in 2007.	
31	7040	<ul> <li>(Re the 30,000 Home Fire Safety Checks target.)</li> <li>Generating requests and referrals for free checksis already being achieved by proactive working with other agencies.</li> <li>New computerised programme already installed in all Service computers. No additional costs involved.</li> <li>Ensuring sufficiently trained personnel to undertake the challenging programme of HFSCs – no additional resources required as 5 extra Community Practitioners already employed, with additional resources being provided by wholetime and</li> </ul>	
32	7020 and 7021, with very similar comments from 7015, 7022, 7024, 7025, 7026, 7031, 7036, 7039, 7040, 7043, 7048 and 7053	As theService is already achieving the target figure (of 30,000 HFSCs) required it therefore negates any need for the possible cut of up to 29 operational firefighters posts.	
33	3018	The lack of detail regarding the generation of the checks leads me to believe that the Service intends to generate the 30,000 safety checks by 'Cold Calling'. I would vehemently oppose such a system on the grounds that it antagonises the public,	
34	I have worked a shift pattern for 21 years, my family life and wife's career has been built around this. So to profoundly change people's lives is not caring nor considerate, neither is it family friendly!		
35	(From a husband and wife working shifts.)it would be totally unworkable for us. we were on the same watchour daughter would have no parent to care for he half of the time. If we were to work on separate watches, we would never have leave at the same time.		
36	7014 (and 7049 similar)  How would firefighters with young children be able to cope with managing children and care when they could be called into work at short notice to cover for absence from the perspective of female fire fighters the changes would appear to be indirectly discriminatory.		
37	In the last few years, NWF&RS has grown and grown, the number of support staff has rocketed I am sure they all play an important part in our development, but it seems strange that only grey book conditioned staff are being culled and affected in these changes.		

_	Contributor Code	Comment Received	
38	7031	It will be interesting to find out whether any posts at principal officer level are to be pruned to bring North Wales into line with the majority of FRS in their family group.	
39	7039 (and 7014 similar)	Minimum cover on shift days would not allow for immediate absences due to sudden sickness, injury, welfare or family issues.	
40	7017	With the ever increasing direction of front line services into prevention, operational training is suffering and the new proposed roster does little to allow the flexibility required to carry out quality and diverse training.	
41	7009, 7010, 7052, 7011, 7049 similar from 7046, 7022,	Using the proposed system, I understand that for two out of five years we will not get any leave during the school summer holidayI believe it is unacceptable to have to rely on swapping with other employees to gain a family holiday during the summer period.	
42	7014	How would operational staff feel if their colleagues in day duties work were not subject to fixed rostered leave whilst they were?	
43	7011	With the proposed new system we would no longer be able to use individual holidays (long service leave, bank holiday leave, etc.) without the hassle of trying to swap with another crew member from another station.	
44	7035	I have recently purchased a timeshare holiday in the Canary Islands. If the proposed new shift is implemented I would not be able to take advantage of my investment. Would the NWF&RS compensate me financially as I am not able to use my time share through no fault of my own?	
45	7017	Long service leave which is only allocated after 5 years service does not appear to be accounted for since all firefighters are assumed to owe the same reserve hours. (Detailed calculations included.)	
46	7048	Although I understand the problems of unwanted automatic fire alarmsasking members of the public to investigate them and report back is absolutely fraught with danger	
47	(Re the AFA false alarms proposal.) The aims of proposal 2 are to cut down on AFAs and to save money in doing so. However, if we consider the new legislation that came into force October last year regarding self regulation, then in my honest opinion it is a very dangerous road to go down after seeing what happened in Newquay, Cornwall.		
48	7036, 7026,		
49	7042 and similar 7014, 7053, 7043, 7018, 7024	How can this (new rostering system) begin to be implemented when it is clear that all the information necessary is notavailable? Some of the information being circulated suggests that the figures and hours being used to calculate savings are	
50	The benefits claimed within the Action Plan are misleading, for instance it state that the system will assist in alleviating recruitment difficulties in areas covered by firefighters working the retained duty system. This is incorrect, the FBU have already		

_	Contributor Code	Comment Received		
51	7025	The absence figure used in the RRP is way off the mark. For the 12 month period of 2006, working the proposed system would have resulted in an overtime bill for the 5 day crewed stations of in excess of £340,000, added to this would be the 3 wholetime watch stations which is likely to be an even higher cost, plus all the additional costs of the proposed roster system.		
52	7040 and similar from 7022 and 7031	The proposed new rostering system increases the probability of any firefighter working at any fire station in North Wales is profoundly worryingimagine the implication of having to train everyone to acquire these new skills, as different stations have different appliances.		
53	7017	This approach to crewing does not make any allowance for the dynamic nature of the working day at an operational station. Crewing to a minimum level allows no scopeto carry out important dutiesoften at short notice and requiring skills of trained personnel (Breathing Apparatus maintenance is a classic example).		
54	7036, 7026 and similar from 7039	the new proposed rostering system would be very difficult if not impossible to implement and manage due to the fact that the fire service can be called upon to attend major incidents across the UK with specialist appliances that are crewed by specially trained firefighters.		
55	7009, 7052, 7010 and similar from 7022,	7052, The amount of notice we will get before being called in on our 'rota days' appears insufficient. If the proposed notice period is only a few days (or even hours), child care would have to be organised to cover all the possible occasions when I could		
56	7014	The proposed increase in funding for CFS does not specifically target the issues raised in the recent Chief Officer's Task Group Report into the target group most at risk. CFS is one of several methods which we as a Service employ in order to protect our communities: the draft RRP is aimed towards increasing our CFS actions, but with no clear policy regarding an equilibrium and cohesion between our methodology of 'protecting, preventing, responding'.		
57	7049	Sickness is likely to increase. () If an employee has no time off sick during 12 months he/she will still owe the same amount of hours as a person who has taken time off sick.		
58	7014	(About the time from initial idea to detailed plans)this does not in my mind provide a suitable period of time in which such detailed information can be processed.		
59	The proposal is to shed 29 jobs by 2011. It is my opinion that this is almost impossible to achieve in a Brigade of this size. This is 15% of the workforce, and coupled with the new Flexible Retirement Policy which makes it impossible to predict when people will leave, it will take many years to lower the establishment to the required level to make the predicted savings. During this timethere will obviously be a freeze on recruitment.			
60	7014	The proposed rostering system would in effect separate operations from the rest of the Service, and would lock operational personnel into one system, reducing opportunities for operational staff and reducing the Service's flexibility, which has traditionally been one of its strengths.		
61	7031	People will not volunteer to undertake specialist dutiesfor fear of being constantly called in for duty.		

#### **Authority's Response**

More individual people than ever before responded to this consultation and we are grateful to all those respondents – predominantly Service employees – who took the trouble to consider and respond thoughtfully to the consultation.

Now that you have shared with us which elements of our proposal cause you the most concern, we are better placed to find a solution that takes account of those concerns.

One area that the Authority will not compromise on, however, is in delivering excellent services at an affordable price. We have a duty to the public of North Wales to continuously strive to improve and modernise the Service, and we believe that this commitment to excellence is shared by our staff.

For this reason, the Authority has decided to proceed with plans shown in proposals 1, 2 and 4 of the Draft RRP Action Plan 2008-09, relating to placing additional emphasis on preventing fires, introducing a more robust policy to reduce the number of times the Service is called to attend false alarms from automatic fire alarms, and investing in strengthening performance management systems.

However, as part of our undertaking to listen to what staff have said, the Authority has decided not to proceed with proposal 3 relating to wholetime firefighter rostering and officer cover until it has had an opportunity to undertake additional research into this area. The Authority will reconsider the proposal once it is satisfied that it has a clearer view of its implications.



# **COMMENTS SUGGESTING ALTERNATIVES**

A few respondents added suggestions for alternative solutions and improvements. Some have already been provided in other sections, specifically in relation to sourcing additional funding either through an increase to the budget or by looking for efficiency savings from other sections of the Service.

	Contributor Code	Comment Received	
62.	7031	(Detailed calculation provided illustrating that the rostering calculations are 'flawed'.) An easier solution to the proposed rostering system would be that on the occasions when watches have in excess of the minimum number of riders on duty, that are required to crew the station's appliances, then any spare personnel are released to carry out CFS duties throughout North Wales.	
63.	7025	(To increase the number of HFSCs.) It would be simple to increase the number of HFSC completed to well beyond 30,000 if all staff were given an easy target number to achieve. At present the only persons within the organisation with ownership for HFSC are station personnel and the dedicated CFS practitioners.	
64.	7056	There are many ways that we can conduct additional HFSCs without increasing or decreasing the workforce and at barely any extra cost to the Service. One of which would be to produce HFSC targets for members of staff other than firefighters.	
65.	7025	The current rostering system for operational staff does result in spare capacity on fire stations. Policies must be produced to ensure the most effective use of this spare capacity.	
66.	060	Has the fire service considered the use of schools and public buildings for training purposes?	
67.	7023	(Trade Association)encourages authorities to engage with the business community concerning any proposals to vary attendance criteria, and where the Service has issues relating to the number of unwanted calls from (AFAs), to work with the premisesrather than vary the attendance.	
68.	7023	(Refers to the Service Standard to fires in dwellings.) There is concern that there is an absence of equivalent standards for commercial property fires, and environmental and heritage risks.	
69.	7007	Is it really necessary to send so much paperwork around the Brigade to collect information, when a properly designed IT system could collate the information much easier, better and more effectively.	
70.	7003	At the very least you should meet with local Councillors and convince them of the need to change.	
71.	7063	We would wish to ensure sufficient provision of turntable ladders where there are high rise buildings.	
72.	7004	(Re inconsiderate and dangerous parking.) Local police could be requested to undertake a census of parking likely to impede your vehicles in an emergency.	
73.	7041	Jump crewing ALPs would save £400,000 so why waste all this money to save £350,000? Money could also be saved by thinning out the top heavy pyramid that is NWFRS.	

# **Authority's Draft Response**

We are grateful for all these suggestions for consideration during the development of the final RRP action plan 2008-09, or as appropriate.



## **QUESTIONS**

Two types of questions were presented in the responses: rhetorical ones expressing frustration or opposition (e.g. 'Is there really a need to make additional investment if we are hitting the HFSCs target already?, 'Have the following been taken into account?'), and others that seemed to be genuinely seeking information. Only the latter have been included here as the others are covered in other sections of this analysis.

	Contributor Code	Comment Received	Authority's response
74.	7007	What percentage of false alarm calls are chargeable? How much does the Brigade recoup from charges?	Current legislation does not allow FRAs to charge for responding to false alarms.
75.	7007	What if the overwhelming response to the rostering proposal is negative, what is the plan – to move forward anyway or review the proposal in view of the feedback?	This is a matter for the FRA to decide.
76.	7007	Officer cover – would seem valid to review the current levels, but with current working practices/agreement, how long term to get where you wish to be?	The proposal is intended for the medium term, but additional work would be needed to map out the likely timescales for full (or near full) implementation.
77.	7007	(Re the 2007-08 RRP.) How did the Brigade perform against the objectives for 2007-08?	Performance against RRP objectives are reported annually via the Improvement Plan (published by 31st October as part of the Wales Programme for Improvement).
78.	7001	Years 2009-10 and 2010-11 appear to tie an apparent reduction in staff to the additional funding available for (Community Safety and Performance Management). Is this a direct correlation? If not, where are the additional resources coming from?	The proposal is intended to release resources from one area of the service to fund additional activity in another.
79.	7001	Does this mean that middle managers are going to be selectively targeted to be taken off the flexible duty system while senior managers are going to retain their flexible duty allowance?	Arrangements will be made to ensure that the appropriate number of people at the appropriate levels of seniority are available to provide operational cover at all times.
80.	7003	Are you going to carry out a public consultation exercise on these (detailed rostering) changes, or just impose them?	This 12 week consultation has provided excellent feedback on the issues that concern staff.

	Contributor Code	Comment Received	Authority's response
81.	7014	With the increasing number of women firefighters, has anyone projected the future impact on the rostering proposal of maternity leave and career breaks?	This will be included in the detailed planning work.
82.	7019	(A list of questions re the Dedicated Response Option, including:) How will the numbers be reduced? Will a pay protection package be offered? Where will they work from? What will happen to current managers that are not selected to be part of the Dedicated Response Option?	As above.

