

ANNEX G

FBU Response to Leicestershire Fire and Rescue Service's 'IRMP Proposals for Change'



Fire Brigades Union
Leicestershire



FBU Response to Leicestershire Fire and Rescue Services 'IRMP Proposals for Change'





CONTENTS

| | |
|---|---------|
| 1. Foreword | Page 3 |
| 2. Executive Summary | Page 4 |
| 3. Scope - Previous Extracts from IRMP's | Page 6 |
| 4. Health and Safety Implications of Leicestershire Fire and Rescue Services' Proposals | Page 7 |
| 5. Public Consultation Issues | Page 29 |
| 6. Conclusion | Page 34 |
| 7. Appendices – | Page 36 |
| BROS Time/Task Analysis: | |
| 1 a - Introduction to BROS | Page 36 |
| 1 b - How it was applied in Leicestershire | Page 40 |
| 1.1 - Loughborough BROS Outcomes 1 | Page 41 |
| 1.2 - Loughborough BROS Outcomes 2 | Page 42 |
| 1.3 - Oakham Outcomes 1 | Page 44 |
| 1.4 - Oakham Outcomes 2 | Page 45 |



Foreword

Leicestershire Fire Brigades Union (FBU) believes we have now reached a significant turning point in the history of Leicestershire Fire and Rescue Service (LFRS). **The biggest cuts in the services' history** (£7.5million over 5 years) will put members of the public at much greater risk. People will die unnecessarily and suffer injuries which could have been avoided.

Firefighters do an irreplaceable job tackling every kind of emergency – fires, road traffic collisions, civil disturbances, terrorist incidents, floods and many more. LFRS is a service to be proud of – and a service worth defending.

In the last 10 years the number of **operational firefighters has reduced by 72** within Leicestershire. This has mainly been achieved by introducing an untested crewing system, which the FBU believe is unsustainable. The system halves the number of firefighters at fire stations with one fire engine, from 28 to 14. Essentially doubling the amount of hours a firefighter is at work to an average 70 hours per week. Further cuts on this scale, indicated in LFRS's 'IRMP Proposal for Change' document states that the proposals amount to a **further reduction of 104 operational firefighter posts over the next 5 years**. This reduction in firefighters, accompanied with the loss of 3 fire engines, (also proposed) will put lives at risk, ruin more homes and businesses, and increase insurance costs.

More cuts in Leicestershire will mean slower response times to emergencies, putting life and property at greater risk. Response times are almost **two minutes** slower on average than a decade ago – and this masks even slower responses in some areas for certain incidents. With further devastating cuts proposed by LFRS, we are rapidly approaching a situation where the public will be subjected to a '**postcode lottery**', in terms of the speed and level of response that they would receive for an emergency incident in their area.

The reduction in fires and calls in Leicestershire is welcomed; it indicates how effective the fire prevention work done by firefighters is. However the risks still remain, and without firefighters to carry out this vital work, further improvements cannot be sustained, indeed they will decline, and years of good work will go to waste. Firefighters tackle a multitude of growing risks every day, but in order to adapt and deal with these ever changing risks, they need to be **properly resourced and funded, not continually cut to justify budget deficits**.

A fire will be no less devastating to a family because of the current financial climate we are in. It will destroy and decimate whatever is in its path, having less firefighters and fire engines only makes its job that much easier, as it can develop, spread, and cause more devastation and damage to whatever gets in its way.

LFRS costs the tax payer of Leicestershire a minimal amount per person per year – exceptional value for money for a first class emergency service. LFRS needs funding commensurate with the huge range of risks it faces. The FBU believe the primary purpose of LFRS' 'IRMP Proposals for Change' document is to 'balance the books'. By doing so it fails to adequately address the risk to the public that these cuts will create. This is the guiding principle behind the legal requirement in the National Framework Document for LFRS, its managers, and fire authority members to adhere to. In a world where the population is increasing, roads are becoming more congested and risks are constantly changing, **investment, not cuts is the answer**.



Executive Summary

The FBU welcome the opportunity to respond to LFRS' document *IRMP 'Proposals for Change' 2015-2020*. The FBU as the representative body of professional firefighters is always looking to support improvement in public service delivery, to save life, save property and protect the environment, whilst forever protecting the health and safety of its members.

In order to carry out its legal requirement for public consultation, LFRS commissioned the alleged 'objective' company, Opinion Research Services (ORS) to carry out this work. ORS state the following on their website:

'Over many years, ORS has worked with a significant number of Fire and Rescue Services to support the development of their IRMP programmes. These important plans underpin significant strategic decisions such as closure of stations or reduction of resources and assets.....'

This alarmed the FBU from the start, with a company's unique selling point being 'closing fire stations' and 'reducing resources'. There is no mention of opening fire stations or increasing resources and assets in any of their portfolio. It will also be shown in this document that ORS were neither objective nor fair in this consultation process, which may have legal repercussions.

The FBU have compiled data in this report that indicates that reducing the crewing on the first attending fire engine from 5 to 4, reduces the life-saving initial actions that can be undertaken. It places the Incident Commander in a potential untenable position; either break procedure and expose their crews to much greater levels of risk, or instruct their crew to wait until sufficient resources arrive, no doubt in the face of huge public and moral pressure. The FBU believe this is completely unacceptable, dangerous and avoidable.

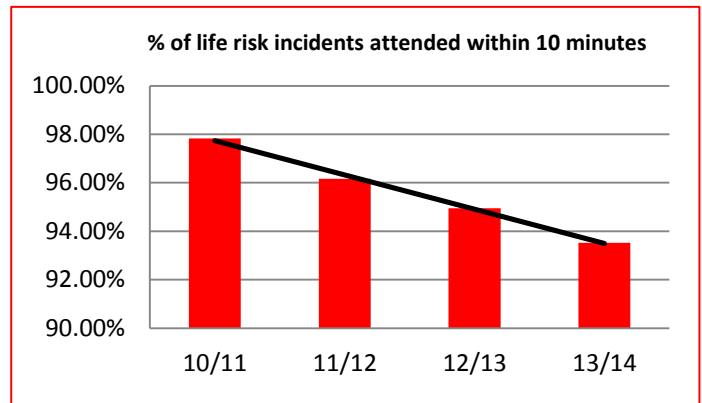
Whilst it is recognised that the FBU were aware of some of the areas for organisational change, we believe that effective consultation has not been achieved with partners and stakeholders on safety critical issues such as; 'switch crewing' of special appliances (omitted from the *IRMP 'Proposals for Change'* document), and task/ time analysis both previously and with these proposals at Health and Safety Committees.

With that in mind it has been left for the FBU to carry out time task analysis for incidents to identify the hazards and impact from 'time lag' for second appliances and the reduction in crew numbers affecting the successful conclusions of incidents.

The basis for change in constructing an IRMP should be to only make changes where it is clear that the overall net effect will be to improve community safety, sadly with this *IRMP 'Proposals for Change'* document the net effect will be in breach to the fundamental requirements of constructing an IRMP as per the National Framework Document.

The FBU is extremely concerned that at a time when LFRS are continuing to fail to meet their own 10 minute response time for ALL life risk incidents (as per its own performance standards in 'Our Plan 2013-2016'), they look to introduce further proposals that will impact this, which has already fallen by 4% over the last four years.

(See Bar chart Right – Figures taken from LFRS document 'FRS Data Last 5 Years')



This report totally refutes the removal of second fire engines at Oakham, Loughborough and Leicester city fire stations. The FBU have utilised the Governments DCLG Planning Tool 'BROS' to clearly identify that the speed and weight of attack at time critical life-saving operations is severely compromised by these proposals.

This report supports FBU member's claims that the Resilience team have already been disbanded and is a fait accompli.

The FBU believe that the Day Crewing Plus (DCP) duty system is unsustainable, and will lead to operational burnout of its staff in future years. Particularly as it is still a fairly new system with little or no data available to analyse its suitability and long term effects to both staff and the service from operating it. It requires firefighters, crew managers and watch managers to reside on the station for an average of 144 x 24hr shifts, per year.

If the proposal for Wigston to change to DCP is realised, this will be the sixth fire station in Leicester, Leicestershire and Rutland, to adopt this crewing system. LFRS's reliance on this system deeply concerns the FBU, particularly as it is now becoming the primary whole-time crewing model, reducing LFRS' overall resilience, both locally and nationally. There are also serious questions over the future pension burden of this system, and the continuing rising capital expenditure surrounding it.

The FBU therefore call on the CFA to reject all proposals that place the public of Leicester, Leicestershire and Rutland at greater risk of injury, harm or death.



Scope - Extracts from Previous LFRS IRMPs

In order to see where you are going, you must first understand where you have been. Below are extracts from two recent LFRS IRMP's, one of which still remains live today. The purpose of including these extracts is to consider their relevance whilst reading LFRS's IRMP 'Proposals for Change' document, and to ask what has changed since they were written.

IRMP 2009-2012:

[An IRMP] *It is a strategic document setting out a joined up approach to risk management through our prevention, protection and response arrangements; balancing the necessary strategic emergency cover with targeting those most vulnerable to risk. Equally important, because of the nature of our work the safety of our own people is critical and our IRMP needs to ensure that we preserve this.*

IRMP 2013-2016:

"Traffic is increasing and predicted to continue growing over the next ten years and this will bring either a corresponding growth in roads and infrastructure or the problems associated with congestion."

"The range of operational roles and tasks has expanded considerably with a number of specialisms such as rope rescue, animal rescue, urban search and rescue and so on and it has become ever more demanding to ensure the required level of skills across the full range is successfully maintained it seems inevitable that a more diverse and more specialised workforce will need to develop."

"A further problem is emerging in relation to the built environment concerning methods and materials of construction. Innovations in less expensive methods of construction, particularly timber-framed property, have been observed to create additional risks and hazards for fire and rescue services." "At the same time, increasing concern over the risks associated with modern firefighting and emergency response...."

"At the same time we will need to respond to the emerging concerns over the rising costs to the economy of fire, particularly to the insurance industry who are increasingly concerned about rising fire losses. It is a reasonable assumption that if the insured costs are rising, the uninsured costs area also rising."

"Providing a fast and reliable response to incidents remains vital. Fire can grow frighteningly quickly and early intervention is important. Our aim is not just to get a first engine to an incident quickly, but to get enough fire engines and firefighters there to safely deal with whatever the situation is."

"Having the right number of people to carry out any given task at incidents safely and effectively, balanced against their efficient deployment is therefore a key issue."

Do the extracts above provide evidence of the need to reduce an already lean Fire and Rescue Service at the expense of public and firefighter safety? The FBU believes not.



Health and Safety Implications of Leicestershire Fire and Rescue Services' Proposals

LFRS IRMP 'Proposals for Change'

LFRS's 'IRMP Proposals for Change' document contains seven proposals that have been approved by the Combined Fire Authority (CFA) for public consultation.

They are:

1. Reduce Ridership to 4 firefighters per fire appliances, across all Fire and Rescue Stations.
2. Remove the second fire appliance from Loughborough Fire and Rescue Station.
3. Remove the second fire appliance from one of the city Fire and Rescue Stations (Central, Eastern or Western)
4. Remove the second fire appliance from Oakham Fire and Rescue Station.
5. Disestablish the Resilience Team.
6. Establish Day Crewing Plus at Wigston Fire and Rescue Station.
7. Whether to hold a referendum to establish the support of the communities in the CFA's area for an increase in the Council Tax of £5 or £10 per year on a Band D property.

The importance of a speedy arrival with the necessary resources is essential to limit the effect of fire. The same is true of many other emergency incidents where the deterioration of the incident is exponential. Firefighters know rapid response times are vital and that cuts to the frontline will slow down the emergency intervention. Firefighters want to intervene swiftly – to make the difference to whether someone lives or dies, whether they are temporarily overcome with smoke or maimed for life, or someone loses their home or possessions. In an emergency, "every second counts".

The FBU would always welcome an improvement in response standards however we have serious concerns regarding the proposals outlined by LFRS.

The FBU have raised, on many occasions, concerns about response times for **subsequent** appliances to ensure correct weight of attack at emergency incidents. Fire causes death, injury, loss of property, loss of buildings, loss of employment and loss of business. The earlier the arrival of the fire service to an incident with the correct resources to deal with it, the more that deaths and injury will be prevented and the more the losses can be reduced. Essentially, LFRS have to assess the risks within their geographical area and provide plans to ensure that in the event of a fire, RTC or whatever the incident, sufficient firefighters and equipment arrive in time to implement correct procedures to protect life and property whilst not exposing firefighters to undue risk.

Therefore In order to determine the "weight" of response to incidents LFRS should break down the **tasks** that need to be carried out in what sequence (including the carrying out of tasks simultaneously) and how many firefighters are required to undertake those tasks. In undertaking this evaluation of tasks, LFRS should also ensure that the tasks are planned in such a way as to reduce risks to the firefighters carrying them out. In short, the authority is required to carry out a detailed risk and task analysis. The FBU have not been presented with any detailed risk and task analysis on any of the proposals presented in the 'IRMP Proposals for Change' document.



It is essential that any response standard is robust and that it does not conceal "unseen" factors. All response standards must start from the time that the fire and rescue service control room receives the initial call. Not to do so would mean that the standard was misleading. The public will expect that the fire appliance will arrive in a given time from when the call was made not from when the crew were notified of the call.

In order to provide assurance to the public and to ensure that there is proper audit of our vital service, there must be a rigorous process by which response time standards including the handling time within the emergency fire control room is measured and performance assessed. This must also include the number of riders on the appliance.

1. Proposal to Reduce the Number of Firefighters on a Fire Engine from 5 to 4.

Historical and legal implications:

The FBU are extremely concerned that this proposal does not adequately consider the impact upon the safety of the public and the safety of firefighters.

The Audit Commission Case Study 4, seeing the light; Innovation in local public services May 2007 stated:



"When it comes to changing the number of fire engines you've got or how you crew them, you have to underpin that with very, very robust evidence before you do it"

The FBU would not wish the Service to drift into assent before fully exploring all the possible consequences and reports into a blanket approach of a crewing level of four. We believe that proposed crewing levels of four will put firefighters and the communities in Leicestershire at unnecessary risk, risk that is acknowledged in a range of reports (fully referenced in this response), reports that we believe have led the vast majority of other UK FRS' to remain with crewing levels of 5 and 4 riders and in some FRS' 5 riders on all appliances.

The FBU are aware of LFRS' financial situation but firmly believe that because operational firefighter numbers are being reduced that consequently firefighter safety will also be reduced.

The national document 'Health, Safety and Welfare for the operational environment' states:

'The Health and Safety at Work Act 1974 applies to all activities of Fire and Rescue Authorities as the employers of fire and rescue personnel. The Act requires employers to ensure the health, safety and welfare at work of their employees and that their activities do not adversely affect the health and safety of other people.'

Also the Chief Fire and Rescue Advisor (CFRA) document 'Fire and Rescue Service Operational Guidance' states:

'FRS' will be aware of their duties as required by the Management of Health and Safety at Work Regulations 1999 (MHSWR). Essentially, they are required to identify and record significant risks to their employees and to other persons arising out of the activities of their undertaking – (Regulation 3).'



In order to achieve this LFRS **must** carry out and record suitable and sufficient risk assessments, implement the control measures necessary to ensure an acceptable level of safety.

The Management of Health & Safety at Work (MHSAW) Regulations places a requirement on employers to consider all work activities from the perspective of the risks they pose to their employees, and the risk posed to other persons who could be affected by the way their employees were undertaking tasks. Leicestershire Fire and Rescue Service (as employers) are **not exempt** from the requirement to comply with this legislation.

To meet the requirements of the MHSAW Regulations the Department of Communities and Local Government produced a series of Generic Risk Assessments (GRA). GRA's simply provide information to inform LFRS' own risk assessments and Standard Operating Procedures (SOP) for the various incidents which firefighters can routinely expect to attend.

The MHSAW Regulations state:

*"Where established industry practices result in high levels of health and safety, risk assessment **should not** be used to justify reducing current control measures"*

MHSAW Regulations runs on the concept of risk assessments as the planning tool to determine correct SOPs. In short, effective SOPs are dependent on accurate risk assessment. Even the casual observer would correctly identify that this risk assessment, by necessity, must include consideration of the number of personnel and the type of equipment needed to effectively minimise risk to them (the employees) sent to emergency incidents.

In short, if you reduce the number of firefighters on a fire appliance the additional responsibilities/tasks that have to be undertaken by the remaining crew must be specifically trained for; and crews informed of the preventative and protective measures that the service has adopted as a result of its extensive risk assessment/task analysis. Quite clearly the HSE indicates that there should not be, as a consequence of removing a firefighter from a fire appliance a 'just get on with it' attitude. The lack of meaningful and credible task analysis by LFRS management indicates this attitude towards its firefighters.



In the correspondence between the FBU and Ian Phillips, HM Inspector of Health and Safety, 23rd November 2005, it states:

"The HSE is concerned to ensure that safe systems of work are adopted at incidents and that where a specific number of personnel are necessary to implement the procedures, they are available. Where the number of personnel is limited, then a different procedure may need to be established, and trained for. Firefighters should always be trained and competent in the safe system of work they employ. HSE also understands that health and safety concerns of firefighters are frequently a consequence of management decisions about standards of fire cover, and would expect risk assessments be updated/reviewed to determine the extent to which crews of less than the recommended standards are able to take action at emergency incidents safely and without significant additional risks to the health and safety of firefighters. Such assessments should be clear about the very real limitations that exist for effective firefighting and rescue action, particularly regarding the numbers of firefighters necessary to conduct BA procedures safely and effectively."

Risk management is not a black and white issue. There are degrees of suitability when it comes to the control measures that need to be put in place to address a risk.



- Crewing appliances with 4 people gives the fire and rescue service (FRS) the opportunity to achieve its operational objectives while ensuring a degree of crew safety.
- Crewing appliances with 5 people enables the best level of crew safety to be assured at most operational incidents while providing sufficient resources to complete tasks successfully.
- Crewing appliances with only 4 people is not unambiguously unsafe. It is less safe than crewing appliances with 5 people, and it also means sacrificing operational effectiveness. Systems of work have to be adapted to minimise the increased risk created by the shortage of staff.

The rider position that is removed due to a default crewing level of 4 is the Breathing Apparatus Entry Control Officer (BAECO).

Communities and Local Government Fire and Rescue Service Circular 18/2009 clearly states that-

"2.4 The Role of the Breathing Apparatus Entry Control Officer (BAECO) is essential to the safe control and support of BA operations. The skills and knowledge to carry out the BAECO role in terms of maintaining proper records on the Entry Control Board, communicating with BA teams, and the briefing and de-briefing of BA teams, is an integral part of both BA training and refresher training."

DCLG have produced a document on BA Guidance, LFRS currently are not adopting this guidance document. However if, in the future, this guidance is followed, LFRS will be unable to adhere or adopt it riding with crews of four. The guidance states:

Initial/rapid deployment of BA may be used where the resources available are limited at the time of arrival to deliver the full operational plan, but where there exists an opportunity to preserve life or take action that will prevent an incident deteriorating if the Incident Commander were to wait for additional resources. Any deployment under these conditions should be managed under Stage 1 Entry Control procedures

To operate Stage 1 Entry Control procedures safely and effectively a BA entry control officer is required. LFRS will not be able adopt or follow this guidance with crews of four.

LFRS are still following the guidance contained within Technical Bulletin 1/97 (TB1/97). TB 1/97 does not permit Rapid Deployment (RD) procedures to be used simply because there are only 4 firefighters available at an incident.

The simple fact is that there are degrees of suitability with Breathing Apparatus entry control procedures.

- Using no entry control procedures is unacceptable.
- Using full stage 1 or stage 2 is a safe system of work.
- Using RD is reasonable as long as it only used infrequently **(in exceptional circumstances)** and where the potential gain is high.

Again the cumulative nature of the risk to which employees are exposed must be considered when thinking about the use of Rapid Deployment.



If LFRS were riding 4 on infrequent occasions, but striving to ride 5 all the time, then attending a house fire with a crew of 4 might be considered as "exceptional circumstances" as described in Rapid Deployment guidelines and the use of RD would be reasonable.

Rapid Deployment was intended to be used in the "**exceptional circumstances**" of a crew of 4 arriving at an incident ahead of the crew of 5.

But LFRS is saying that it intends to ride 4 as normal practice. BY DEFINITION, arriving at a house fire with a crew of 4 will no longer be "exceptional". It will be normal practice and Rapid Deployment is not intended for normal practice.

The cumulative risk to the health and safety of personnel created by using Rapid Deployment on every occasion would be unacceptable and in contravention of the *Management of Health and Safety at Work Regulations* Para 30, which states-

"Avoiding risk is the first and best principle of prevention, introducing practices that assist in risk mitigation is the fourth best principle of prevention"

The FBU believe the issue of peer or community pressure, as a result of riding 4, has not been adequately addressed, however it is discussed in the HSE's publication *Managing For Health and Safety* (HSG 65).

A probable scenario would be a person's reported incident, where the casualty is not *known to be within a short distance of the entry point*, and where members of the public are watching LFRS activity. Even with the Rapid Deployment procedure, it would be unsafe for a crew of four to enter the building to search for a casualty. However the watching public would expect to see positive action being taken.

This pressure would very likely drive FRS personnel to put their own health and safety to one side and to enter the building anyway despite the systems and rules that are associated with Rapid Deployment (RD) working to ensure health and safety. It is human nature.

The use of RD is supposed to be limited to infrequent exceptional circumstances because the safety controls associated with their use can go against human nature and the effect of community and peer pressure to act.

By allowing, indeed expecting RD to be used on every occasion (the alternative is to stand outside a burning house with persons trapped and await the arrival of the second appliance), LFRS would knowingly allow RD as a system for *normal use* that is designed without taking proper account of human factors. HSG 48 highlights the risk and consequence of human failings.

If LFRS believe it is safe to ride with four then the question has to be asked – which firefighter is removed?

Which of the firefighters necessary to do the tasks in line with Standard Operating Procedures, against which we train, is not required in the initial phase at a 'standard' dwelling fire? Simply put, which of the five firefighters, we believe is necessary to safely tackle a dwelling house fire, does this Authority believe is not required?



Incident Commander – Is LFRS saying that we do not need an Incident Commander to make an initial assessment of the incident and to deploy crews according to this assessment? Is Incident Command a safety critical task and therefore a necessary measure to control the risk to which firefighters are likely to be exposed?

A Team of 2 BA Wearers – Is LFRS saying that we do not need to deploy a team of 2 BA Wearers internally in the dwelling for rescue or firefighting? Is a team of at least 2 BA Wearers a minimum requirement for BA Procedures, and is this minimum number of BA Wearers not safety critical, and hence a necessary measure to control the risk to which firefighters are likely to be exposed?

Pump Operator – Is LFRS saying that we do not need a pump operator to control the supply of water for firefighting or firefighter protection to the BA team which has been committed to the fire in the dwelling? Is the requirement to have a dedicated pump operator not safety critical, and hence a necessary measure to control the risk to which firefighters are likely to be exposed?

BA Entry Control Officer – Is LFRS saying that contrary to Standard (and nationally accepted) Operating Procedures that we do not need a designated, stand alone, BA Entry Control Officer to be responsible for BA control at any dwelling fire incident? Do they intend to revise its local Standard Operating Procedures in respect of BA to the extent that they deviate from nationally accepted Standard Operating Procedures in respect of the need to establish BA Entry Control before firefighters are committed in BA? Does LFRS believe that the requirement to have a dedicated BA Entry Control Officer is not safety critical, and is not a necessary measure to control the risk to which firefighters committed in BA are likely to be exposed?

Clearly there are activities that occur at operational incidents which sit outside SOPs and are unconventional or that may briefly make the working environment unsafe; these occasions will become the norm due to the 4 riders. However, because people believe they can get into some kind of trouble for failing to observe the rules they do not report unconventional activities or unsafe events and keep their fingers crossed that nobody else will either. Seeing SOPs involved in failure can attract professional criticism for those managers involved in their design and implementation.

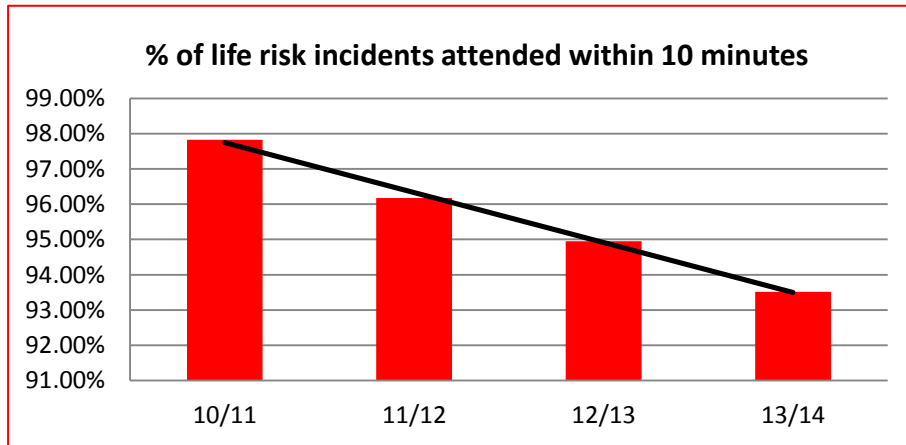
If LFRS implement the proposals of crewing with four riders across the board, then if difficult decisions are not taken i.e. telling a crew of four to stand outside a house fire and await the arrival of the 2nd appliance, and Incident Command Systems do fail to protect the health and safety of firefighters, LFRS will have to accept that the situation was reasonably foreseeable and was of their own making. They will have to accept that the root cause was a failure to incorporate adequate corporate health and safety management into the IRMP process.

Specific Impact of Crewing ALL Fire Engines in Leicestershire with a Crew of Four:

LFRS states in the IRMP 'Proposals for Change' document that the impact of this proposal on the public would be:

“You would not see any change in our response times. If you dialled 999 a fire engine would still arrive at your emergency within 10 or 20 minutes, depending on the severity of the incident.”

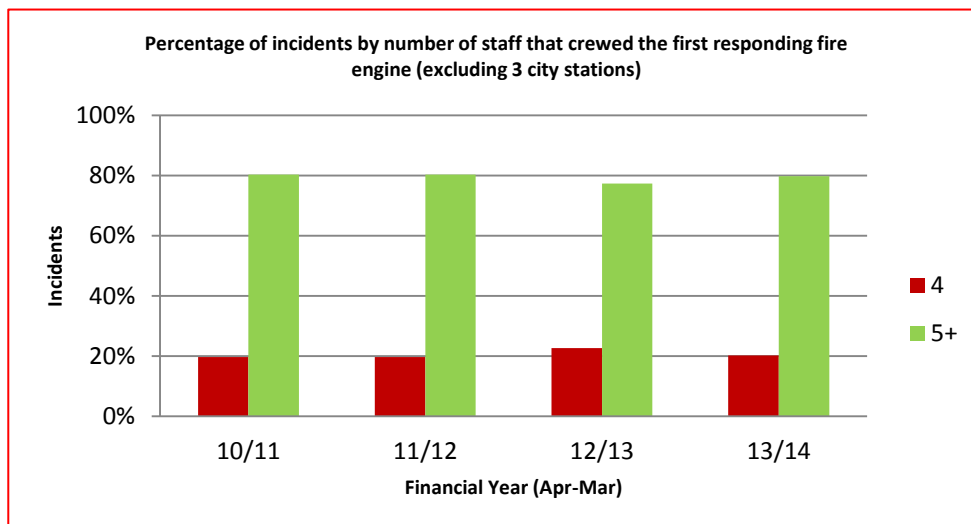
The suggestion that response times will not change is correct, if the trend of **not achieving** the 10 minute attendance time to ALL life threatening incidents continues (LFRS's own performance standard in 'Our Plan 2013-16'), as it has done from 2010-2014 (see graph below). This concerning downward trend in attending life threatening incidents along with the reduction of crew members from five to four as standard WILL result in the **public being placed at greater danger** in fires, road traffic collisions, water incidents, and other special services. This is due to crew members of four being only classed as a 'competent unit for basic operations' (quoted from *LFRS IRMP 2013-2016 Appendix C*) who, the FBU believe, (for reasons already stated) will be unable to implement timely offensive interventions to save life.



The bar chart on page 13 of the *IRMP 'Proposals for Change'* document (not illustrated) shows that between 2011-2014 a 'higher' number of incidents were attended by a crew of 4 on the first responding fire engine than any other crewing level.

The FBU have carried out their own analysis of these figures and quantitative data used and believe **it is misleading**. The data is portrayed in such a manner, to suggest that LFRS already ride with 4 crew members the vast majority of times and therefore this proposal has little or no significance. This could not be further from the truth.

The FBU have gathered data that indicates that with the exception of the city stations (for reason explained below), **riding 5 or more on a Fire Engine has been achieved 80%** of the time across the service between 2010-2014. (See bar chart below)





The reason the city stations were omitted in the FBU's analysis is due to their current crewing model being different from the rest of the Service. The City of Leicester has three fire stations which house two fire engines; each consisting of four firefighters on each fire engine, totalling six fire engines covering a city of 330,000 people. Prior to 2010, the first fire engine at each of the three city stations would always ride with a crew of 5 whilst the second fire engine would ride with 4.

Despite FBU opposition to reduce each city station to ride with '4 and 4' on each fire engine, LFERS management justified the change with the following rationale from the 'IRMP 2009':

"We believe that it is safe to make this change at Leicester City fire and rescue stations due to their proximity and ability to provide mutual reinforcements within a reasonable time period."

With the above in mind and the fact that the vast majority of times both fire engines from each city station attend incidents together, or with a minute or so of each other, this allows for a minimum of 8 firefighters to carryout immediate life-saving action, whilst not contravening procedures.

This cannot be said for the rest of the service, where the attendance of the second fire engine varies greatly, especially in rural areas. Thus by reducing the crewing on that first attending fire engine from 5 to 4, it reduces the life-saving initial actions that can be undertaken by 20%. This also places the Incident Commander in a potential untenable position; either break procedure and expose their crews to much greater levels of risk, or instruct their crew to wait until sufficient resources arrive, no doubt in the face of huge public and moral pressure. **The FBU believe this is completely unacceptable, dangerous and avoidable.**



2. Proposal to Remove One Fire Engine from Loughborough Fire Station

The FBU are very concerned that the proposal to remove the second appliance at Loughborough Station cannot be achieved safely and will put the public and firefighters lives at unacceptable risk. This proposal does not adequately consider the impact upon the safety of the public of Loughborough and the safety of the remaining crews.

We have already stressed that 'weight of response' is equally as important as 'speed of response', in order to get the necessary resources to an incident for it to be dealt with quickly and most importantly safely. If there are insufficient crews or resources at an incident in sufficient time, rescues and certain safety critical tasks will not be able to be carried out, greatly impacting the outcome of an incident.

Whilst the number of crews on an appliance is important, **equally important is the time lag** between first attending appliances and subsequent appliances. The removal of an appliance at Loughborough may not have an impact on the attendance time of the first attending appliance; however the delay in the attendance time of subsequent and vital support from oncoming appliances would put the lives of the public and crews at unacceptable risk.

The proposal states:

“Currently, if you have a fire at your home or are involved in a road traffic collision in the Loughborough area, then it is likely that two fire engines will be with you within 10 minutes. If we remove a fire engine from Loughborough Fire and Rescue Station, the first fire engine will still be with you within 10 minutes. The second fire engine will come from Birstall, Castle Donington or Shepshed shortly afterwards, and will attend the Loughborough area within 13 minutes. Most importantly, we will still be achieving our standard of attending any life threatening incident with the arrival of the first fire engine within 10 minutes.”

This statement is very misleading, and would lead the reader to believe that there will only be a 3 minute delay in the attendance time of a second appliance into Loughborough if the proposal goes ahead, however, we have analysed the attendance times of all the incidents in the last 4 years when the above appliances have attended the Loughborough area and this is obviously not the case.

Below is a diagram that shows the 'average time' from 'time of call' to 'booking in attendance' of the following appliances when attending incidents in the Loughborough area since Apr 2011:

| | | |
|---------------|---------------|------------------|
| Shepshed | Birstall | Castle Donington |
| 14:13 minutes | 14:21 minutes | 15:06 minutes |

None of these are within the 13 minutes stated in the IRMP, more importantly the average time lag between the 'attendance time' of these appliances and the 'first attending appliance' at these incidents, was between 7.00 - 15.00 minutes.

This clearly shows that crews will be left to deal with incidents with insufficient resources for an unacceptable amount of time.



In order for fire services to determine appropriate speed and weight of response they must carry out robust risk assessment of time/task analysis. DCLG provided a risk assessment model called BROS for fire and rescue services to use for this purpose. No such risk assessments of time/task analysis have been carried out by LFRS. Crews at Loughborough have used the BROS planning model to demonstrate exactly what these proposals would mean. (See Appendix 1.1 and 1.2)

As you can see from the BROS analysis, **the results are hugely concerning** indeed. There is a massive impact on the 'weight of attack' and with reduced crewing on the first fire appliance, this also impacts on the 'speed of attack' of offensive life-saving action that Loughborough crews could provide. This would lead to 'defensive' tactics having to be employed for most incidents, at huge cost to life, property and the environment.

IRMP 'Proposals for Change' document, page 6 shows a chart showing the reduction of calls in the Loughborough and Charnwood area over the past 5 years. However, this does not mean that there is a reduced requirement for the current fire cover.

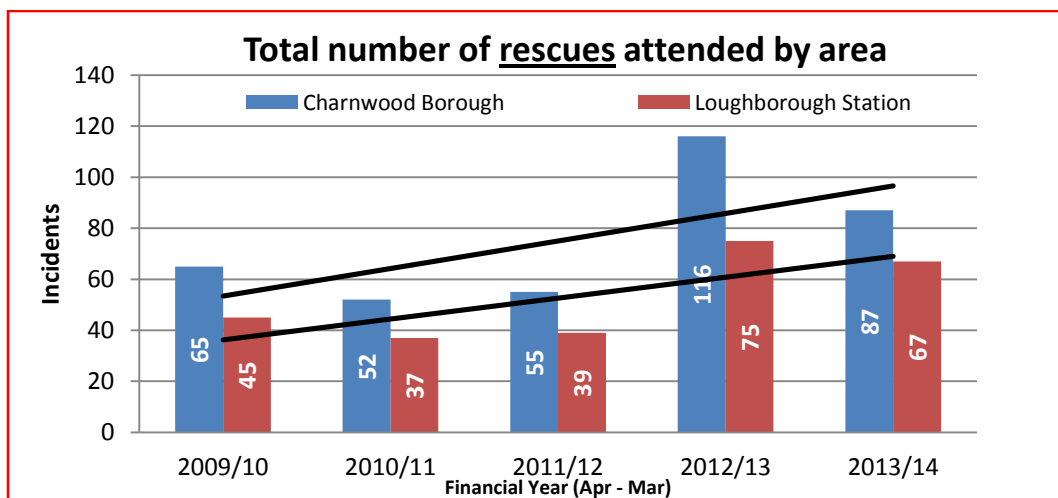
Quote From the Chief Fire Officer

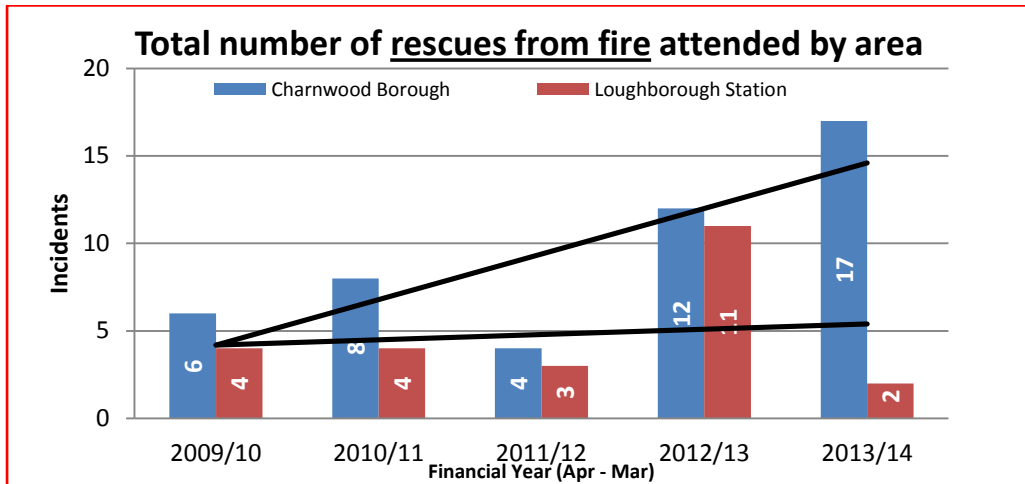
LFRS Chief Fire Officer (CFO), Dave Webb, in a BBC TV interview; acknowledged the risks of these proposals by stating:

*"[The cuts] would be **challenging** to **individuals**, it would be challenging for **firefighters** because they have to cope with **fewer people** potentially **on the fire engine**.*

*"Members of the **public** would probably **notice the difference** if they **called the fire service**. Probably not with the first fire engine arriving but **certainly the second**, in some areas, **would be slower** than it currently is"*

The diagrams below and overleaf show the 'number of rescues' and the 'number of rescues from fire' carried out during that same period.





As you can see there has been a clear increase of rescues during this time, which demonstrates that a reduction in calls does not mean that the 2nd appliance at Loughborough can be safely removed, to do so would be dangerous to the public.

With only one Fire Engine with a crew of 4 rather than 5 (which is also being proposed), life-saving action is greatly reduced. This is because rather than having 2 Fire Engines with 9 firefighters attending together, you will only have 1 Fire Engine with 4 Firefighters, greatly reducing the life-saving tasks that can be undertaken or putting crews under huge pressure to act without the necessary safe systems of work in place.

The risks are even greater in Loughborough due to the nature of the town and surrounding area, including the following:

- Loughborough is the fastest growing area in the county.
- It has a very busy road network including the M1 which is getting busier every day.
- It has a busy rail track and commuting route, and a canal network.
- It has a major UK Airport that is also getting increasingly busier.
- It has High rise buildings which are extremely resource intensive for the Fire Service.
- It has a huge University and colleges with over 20,000 students, which is increasing year on year.
- It has a number of high risk industries including Loughborough Hospital, Thermo Fisher Scientific, 3M Healthcare, Anstey Wallpaper, DePack, Preci Spark, Great Central Railway, Hollywell Park, Brush Electrical Machines.

Also, no mention has been given during the consultation to the 2 'special appliances' currently at Loughborough, a Water Carrier and the Detection, Identification & Monitoring (DIM) vehicle. Both of these vehicles are crewed on a cross crewing basis, if they are required then crews jump across from one of the appliances at Loughborough. Obviously, if the proposals go ahead, leaving only one appliance, this would leave the Loughborough area with **no fire cover** each time these appliances are required. This would also be the situation when more than one call is received, leaving Loughborough with **no fire cover** when the one remaining appliance might be dealing with a lower risk call.

To suggest that these changes would not have an impact on community fire safety is also not the case. Clearly 4 firefighters could not carry out the same amount of community fire safety work as the current 9 that are on duty at any time. Currently, if an appliance attends an event in any of the surrounding villages, one appliance would always remain in the



Loughborough town area proving fire cover; this would not be able to happen if these proposals are accepted.

This proposal (combined with the proposal to reduce crewing) will have a significant material effect on public and firefighter safety. It should not be the subject of public consultation as a potential change to the service without first having been the subject of detailed discussions between the FBU, management and employers through the statutory Health and Safety Committee, and detailed risk assessments including Time/Task analysis are carried out.



3. Proposal to Remove One Fire Engine from the City Area

The FBU are extremely concerned that this proposal does not adequately consider the impact upon the safety of the public of the City of Leicester and the safety of attending crews.

The proposal states:

“Currently if you live in the Leicester City area and have a fire at your home, or are involved in a road traffic collision, two fire engines will be with you within 10 minutes. If we remove a fire engine from one of the City fire and rescue stations there will be no difference: two fire engines will still be at the emergency within 10 minutes.”

Traffic is increasing and predicted to continue to grow over the next ten years and this will bring either a corresponding growth in roads and infrastructure or the problems associated with congestion so with this in mind and a suggested public spending freeze from all political parties, now is not the time to reduce the public insurance cover from the City area.

Removing a fire engine from Leicester City **will increase the risk to the people** who live, work and commute through the City area.

The justification for the reduction in crew members at City Fire and Rescue Stations in 2009 by LFRS was stated as:

‘We believe that it is safe to make changes at Leicester City Fire and Rescue Stations due to their proximity and ability to provide mutual reinforcements within a reasonable time period.’

It may not have been unsafe to reduce the crew members from five to four at the City stations in 2010 due to the fact these three stations have two fire engines each (8 crew members), but to further reduce the crew members of one of these Fire and Rescue Stations, will limit the offensive action that can

Quotes from City Fire Officers:

‘I have been to many incidents when seconds have counted. 3 children are alive today because we were able to attend quickly and in force. Any increase in attendance times puts your families at risk.’

‘As a crew manager of 15 years, my job is made harder and sometimes impossible by riding with a crew of 4. I feel like I'm on a knife-edge - no matter how much experience or training I have’

‘The first 10 minutes of a job can decide its outcome. Without sufficient weight of attack the scales tip heavily towards loss of life, greater property damage and increased danger to firefighters. When I'm in charge of an incident, I need multiple pumps and crews there quickly within this time to readdress this balance. The proposals from management do not allow this’.

‘Lessons from deaths of firefighters are not being learned. Reducing crews, number of pumps and therefore increasing attendance times undo all the hard work and training these lessons have taught us’

Leicester City is a hive of activity. More people live in the centre than ever before. High rise procedures are constantly required and are in use. The risks to greater numbers of public require greater, not reduced, protection. Reducing city pumps is not a viable proposition for the business we are in’

‘How can we ask people to pay the same and yet give them a lesser service?’

‘If your nearest fire engine is already at an incident, you no longer get another moved in to your area to provide cover. You are at far greater risk than you were in the past when we used to provide this service. Why has this been allowed to happen?’

‘I will always give everything and ask the same of my crew. I fear though, that in the future if these cuts go ahead, it's not going to be enough. Lives and property will be lost, in spite of our best efforts’

‘Find another way to save money. Do not affect what we are fundamentally here for. The only important aspect of the fire service is getting well trained and equipped crews to the scene as quickly as possible. Everything else is window dressing’



be taken in time critical situations, resulting in an increased risk of death, injury or harm to the public of Leicester City.

Leicester City has the largest risk profile in Leicestershire and is increasing. The proposal to remove an appliance from the City area without the data to propose which of the three City stations could justify this reduction in fire and rescue cover, highlights the lack of intelligent consideration to allow for an intelligent response.

Furthermore, the lack of horizon scanning by LFRS management over future development and visions for Leicester city is extremely concerning.

City councillors and planners are looking to increase inner city living from its current total of 6,000 (within the inner city ring road) to 20,000, in future years. In a an interview with the Leicester Mercury on the 21st December 2014, Councillor Patrick Kitterick, Chairman of Leicester City Council Planning Committee, states "If we are going to provide that [amount of people], we are going to have to make some choices about density".

He then goes on to say "Certainly where there is regeneration we should be looking at taller buildings, providing a decent standard and offering an option of car free living in the city centre".

City Mayor, Sir Peter Soulsby, stated in the same article, "There was already a move toward city centre living". He then goes on to say "Having 20,000 people living in the city is a realistic target".

If one of the three City stations were to lose an appliance combined with the "switch crewing" of the Aerial ladder platform (ALP) at Central station, this could result in the actual reduction of two City appliances at certain times, if the City ALP was already committed.

Clearly with city officials looking to triple the population living within the city ring road, and the increase in use of high-rise buildings, which are one of the most serious and difficult types of fires to deal with, now is NOT the time to be reducing fire engines and specialist equipment high-rise equipment such as the ALP, **LFRS should actually be looking to increase resources.**



"Let's get 20,000 people living in Leicester city centre" - says planning boss

By danjmartin | Posted: December 21, 2014



Leicester City Centre

Comments (9)

A council planning boss has said Leicester city centre would be greatly improved if the number of people living there more than triples over the next 20 years.

Councillor Patrick Kitterick, chairman of Leicester City Council's planning committee, said there are currently some 6,000 people living within the inner ring road.

He said that figure should rise to 20,000.

He was speaking at a meeting where the committee approved an eight storey block of flats on an unauthorised car park in Charles Street.

He said: "Currently, on and off, there are 6,000 living within the inner ring road. I think we would want to see, as a city, that number over the next couple of decades go up to around 20,000."



The LFRS IRMP 'Proposal for Change' document states:

'Therefore along with the existing cover from neighbouring Birstall, Wigston and Southern Fire and Rescue Stations, it is safe and feasible to remove a fire engine from the City'

Birstall Fire and Rescue Station covers the area the 'now closed' Syston Fire and Rescue Station used to, which means it is feasible that Birstall could be deployed elsewhere in the county. Birstall also "switch crew" the second ALP which could be committed resulting in this control measure for City deployment being reduced.

Wigston Fire and Rescue Station cover the South of the county and are frequently requested to stand by at Lutterworth station; this could further increase the risk to the City of Leicester if a fire engine is removed.

LFRS are also proposing that Southern Fire station should "switch crew" the Heavy Rescue Unit (HRU) based there, meaning that if this special appliance was also committed, then a further fire engine suggested as a control measure for the removal of a fire engine from the city, would also be removed.

The FBU believe that the lack of intelligent consideration for the impact of these 'knock on' effects of current and proposed changes is alarming, **and will put the public of the City of Leicester at an increased risk of death, injury and harm.**

Other factors to consider:

- How can the public decide on this proposal when LFRS don't state which fire engine from which city station will be lost?
- The City of Leicester has the biggest risk profile in Leicestershire and it is increasing. It has 8 Category four sites (highest risk), 25 Category three sites, and 60 Category two sites. If anything LFRS should be increasing the level of fire cover, not reducing it.
- The economic consequences of a big fire in Leicester are huge, therefore reducing LFRS' ability to make early intervention and stop a small fire becoming larger and even more dangerous, is vastly reduced by removing a Fire Engine.
- 24 firefighting posts have already been removed from the city since 2010. Removing more Firefighters significantly increases the health and safety risks to the public, as they may face the moral imperative to act resulting in firefighters taking more risk with fewer resources available.
- One high rise incident in the city (a hugely complex and resource hungry incident) would leave only one Fire Engine to cover the rest of the city. High rise incidents have been the greatest cause of fire fighter deaths in recent years.
- There are large numbers of high multi-occupancy buildings in the city with an ever growing population.
- High number of derelict buildings with the possibility of vagrants.
- Small and medium size enterprises are statistically less likely to recover from a fire



4. Proposal to Remove the Second Fire Engine at Oakham Fire Station

The FBU are extremely concerned that this proposal does not adequately consider the impact upon the safety of the public of Rutland and the safety of its Firefighters. Arguments already made concerning the Loughborough proposal are just as prevalent with the Oakham proposal, removing a Fire Engine from Oakham will **significantly increase the risk to the people** who live, work and commute through the Oakham area.

The proposal states:

“Currently, if you live in Oakham and dial 999 for a life-risk emergency, two fire engines will be with you within 10 minutes. Implementing this proposal would mean that the first fire engine from Oakham will still be with you within 10 minutes. The second fire engine will come from Uppingham, Melton or Billesdon (or Corby or Stamford), and will attend the Oakham area within approximately 14 minutes. Most importantly we will still be achieving our standard of attending any life threatening incident with the arrival of the first engine within 10 minutes.”

The FBU believe that LFRS have failed to consider the issue of cross border interoperability and mutual assistance. LFRS have failed to take into account the issue of other brigades IRMP's and actions bordering brigades are taking when considering this issue.

In LFRS' IRMP 'Proposals for Change' document LFRS suggest two cross border control measures of Stamford (Lincolnshire) and Corby (Northamptonshire) support to justify the removal of the 'On Call' section in Rutland, both of these control measures are 'On Call' (Retained) and are subject to crewing availability issues. Further to that Corby station is at risk of removing an appliance in their IRMP, therefore downgrading their own control measures for incidents in their own area, therefore providing support to LFRS is increasingly unlikely if non-existent.

Below is a diagram that shows the **'average time'** from 'time of call' to 'booking in attendance' of the following appliances when attending incidents in the Oakham area since Apr 2011:

| Melton | Billesdon | Uppingham | Stamford |
|---------------|---------------|---------------|---------------|
| 22:28 minutes | 18:41 minutes | 20:56 minutes | 19:20 minutes |

These attendance times are **significantly more than the 14 minutes stated** in the IRMP 'Proposals for Change' document.

For the population of Rutland, the proposal to remove the second fire engine and the proposal to crew all fire engines with a minimum of four people has huge implications on the way Oakham Fire Crews will be able to operate. In most cases they will have to take 'defensive' actions until sufficient resources arrive, this could have disastrous consequences on any potential life-saving actions, therefore placing the public at much greater risk of injury, harm and death as a result of LFRS' proposals.

In order for fire services to determine appropriate speed and weight of response they must carry out robust risk assessment of time/task analysis. The government department DCLG provided a risk assessment model called 'BROS' for fire and rescue services to use for this purpose. **No such risk assessments of time/task analysis have been carried out by LFRS.**



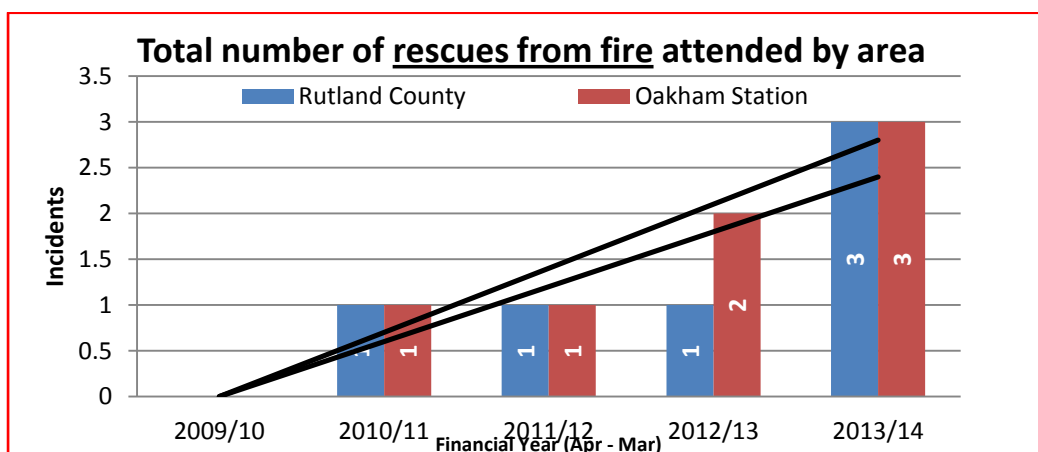
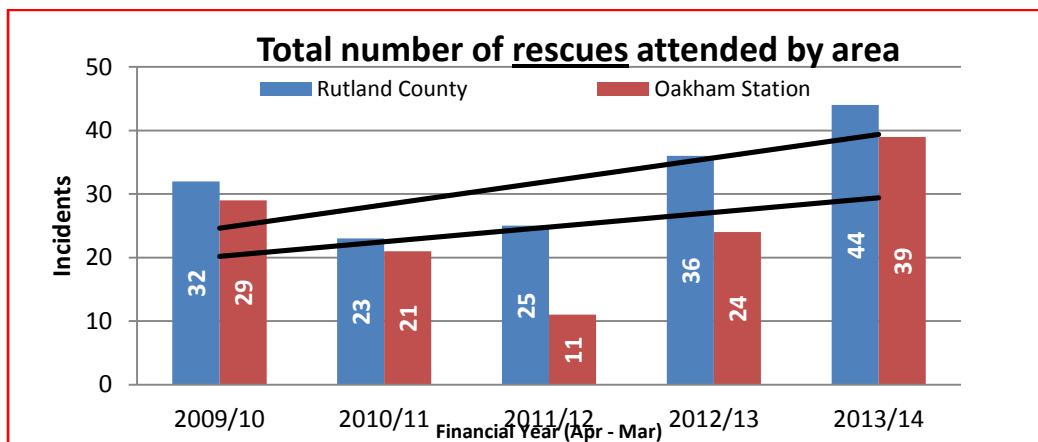
Crews at Oakham have used the BROS planning model to demonstrate exactly what these proposals would mean. (See Appendix 1.3 and 1.4)

As you can see from the BROS analysis, **the results are hugely concerning** indeed. There is a massive impact on the 'weight of attack' and with reduced crewing on the first fire appliance, this also impacts on the 'speed of attack' of offensive life-saving action that Oakham crews could provide. This would lead to 'defensive' tactics having to be employed for most incidents, at huge cost to life, property and the environment. LFRS acknowledge the importance of 'speed' and 'weight of attack' in their IRMP 2009-2012:

IRMP 2009-2012 states:

"We consider that the weight of attack is not a matter for public consultation as it is derived from sector specific professional judgement, scenario planning, operational debriefs and preplanning activities. The speed of attack is however a matter for public consultation as it is probably the single most direct measure of the level of service delivery that the public can influence".

Furthermore, in addition to the **emergency calls in Rutland increasing last year**, as you can see from the two bar charts below, there has been a continuing increase in the number of rescues that have been carried out by Oakham's crews. The question then must be asked, could they have then carried out these life-saving actions with only 4 on the first fire engine, and no second fire engine from Oakham as back up? The FBU believes not.





Another omission from LFRS' proposals is the way the **Heavy Rescue Unit (HRU)** based at Oakham will be crewed. Currently it is crewed by the 'On Call' (retained) staff, so if they are removed is it the intention of LFRS to remove this appliance too? If so why has this not been consulted at statutory Health & Safety Committees, or not included in LFRS' *IRMP 'Proposal for Change'* document?

This specialist appliance was originally placed at Oakham due to its remote location and high risk profile for Road Traffic Collisions (RTC's), and there is no data to support its removal, in fact, that there has been an **'increase in rescues'** suggests the exact opposite.

If the proposal to remove the On-Call staff and crew all fire engines with four as a safe minimum is realised for Oakham station, then the speed and weight of attack to carry out immediate offensive action to save life, save property and protect the environment, whilst implementing a safe system of work will be removed, which could result in a greater risk of death, injury and harm to the public living, commuting in the Rutland area.

Other factors to consider:

- The number of whole time firefighting personnel has already been cut from 28 to 14 reducing its resilience
- Oakham has a busy road network, including the A1 but also a large number of rural roads, where if there is an accident it's likely to require a minimum of two fire engines.
- Oakham is remote with little support; the next nearest full-time station is Melton.
- The water supplies are poorer in rural areas, so water relays are required. This requires a large number of fire engines, not fewer.
- Fires in remote areas are likely to develop significantly before adequate resources will be available.
- Large Military camps in the area which are more susceptible to terrorist incidents than ever

Taking all of the points raised into consideration, the FBU wholeheartedly oppose these proposals for Oakham station. In essence, as result of the cumulative effect of LFRS' proposals would see Oakham lose one firefighter from its first fire engine taking it down to 4, completely remove its second fire engine, and potentially lose another with the removal of the Heavy Rescue Unit.

The FBU have no doubt that these 3 devastating changes will cause further injury, harm and death to the public of Oakham. The FBU have demonstrated through the government planning tool 'BROS' that 'speed and weight of attack', emphasised so greatly by LFRS, will clearly be compromised and members of the public and firefighters will have **knowingly been placed at greater risk by LFRS.**

To expose the public to such risk, when Oakham's second appliance only cost's £97,000 per year, out of LFRS's £38 million per year budget, the FBU believe would be a grave error.



5. Proposal to Disestablish The Resilience Team

The resilience team were disestablished on 1st August 2014, and have not been available to provide any cover for resilience requests since that date.

The IRMP consultation document states,

*"We have increased our whole-time capability by opening new whole-time fire and rescue stations at both Birstall and at Castle Donnington. In addition one fire engine at Melton Mowbray is now crewed by whole-time day crewing staff from 07:00hrs to 18:00hrs. **This has clearly reduced the need and demand for the resilience team.**"*
(IRMP Consultation on Proposals for Change, 2015-2020, page 15)

"...you will not see any change in the service we provide." (IRMP Consultation on Proposals for Change, 2015-2020, page 15)

The resilience team were requested 3603 times between March 2013 and March 2014, 2303 of these requests were provided with operational cover for a total of 6700 hours. Due to the number of retained that have left the service and the difficulty in recruiting, we firmly believe that there is in by no means 'a reduced demand for the resilience team. No factual evidence to support the statements in the IRMP has been presented to the FBU or stakeholders, neither has the disestablishing of the resilience team and impacts been discussed at Health and Safety committee.

Therefore the above statement is incorrect, misleading and is clearly designed to back up an already pre-determined and desired outcome to the consultation.

The fact that the resilience team have already been disestablished means that the proposal is clearly not still at the formative stage, it also makes it difficult to accurately present the demand continued demand for the team as some stations have stopped sending requests knowing that they are not available to be sent.

The Resilience Team was originally was made up of 10 firefighters that were tasked to back fill crewing deficiencies at retained stations. This ensured that stations such as Billesdon and Uppingham, that have always struggled to recruit retained staff, still have an appliance on the run.

Although this proposal is in the IRMP for public consultation, the disbanding of the Resilience Team has already taken place. Therefore the issues surrounding this proposal are already taking place and are explained below.

Now that the Resilience Team are no longer back filling crewing deficiencies at Retained stations, there has been a significant **increase in Retained Appliances being unavailable** affecting the Services' ability and strategic aim of keeping 30 fire appliances on the run. This will also have an impact on the availability of the appliances that have to cover in the areas affected.



In the latest performance monitoring report presented to the Policy Committee on 8th Nov 2014, the '**% availability for RDS appliances**', between April 2014 – Sept 2014 was as low as **83.5%**, significantly lower than the target of 93% and the lowest it has been in over 5 years. This is even more concerning considering the resilience team were only disbanded on the 1st August 2014.

It has also meant that whole-time crew members have been detached to maintain retained appliances, often at the expense of dropping their own crewing from 5 to 4. This should not be occurring because it increases the risk to firefighters on stations where crewing is reduced to four. Furthermore, if the proposal for normal crewing to be reduced to four goes ahead, detaching whole-time firefighters to retained stations will be impossible because it would mean leaving only three firefighters on the whole-time crew, or retained appliances will go off the run even more frequently.

The FBU in conjunction with the **Fire Peer Review Team** would find it difficult to justify the disestablishment of the resilience team when LFRS were given positive feedback because of its introduction and impact of keeping more Retained Appliances available.

In the Fire Peer final report produced in February 2012 the peer team wrote:

Response

An area that contained an example of notable practice with the peer challenge team identifying the following:

Strengths:

Retained resilience team concept

The retained resilience team concept is an excellent idea, which has brought about demonstrable benefits to the community. This positive idea has had a number of effects, including –

- *Increased availability of on call fire appliances*
- *Helped to strengthen the relationship between on call and whole-time staff.*
- *The team are seen as very positive and are driven to making a difference in the community.*

The peer challenge team believe this is notable practice

Whilst the FBU is aware of the difficulties in the retention of Retained staff, the capital expenditure of over £11 million for these two new DCP fire stations in comparison to the cost per year of approximately £250,000 for both Moira and Syston, gives serious misgivings to capital expenditure already spent, which has clearly contributed to the £7.5million budget deficit LFRS now faces over the next 5 years.



6. Proposal to Establish Day Crewing Plus at Wigston Fire Station.

One of the biggest contributing factors leading to the **reduction of 72 operational firefighters** in the last 10 years has been the introduction of the Day Crewing Plus (DCP) crewing system within LFRS.

Although it has only been established since April 2013, stations such as Hinckley, Oakham and Coalville have all seen reductions in whole-time firefighters from 28 to 14. This system requires firefighters, crew managers and watch managers to reside on station for an average of 144 x 24hr shifts, per year. Essentially doubling the amount of hours a firefighter works to an average of between 70 and 80 hours a week.

The FBU believe the DCP duty system is unsustainable for the long term future of LFRS. The FBU have concerns that it will lead to **operational burnout** of its staff as LFRS place more and more reliance on system that is rapidly becoming the primary whole-time crewing system.

The FBU have already observed that **sickness figures for DCP stations are higher** on average per person than that of the 2-2-4 shift pattern (provided from LFRS quarterly performance indicators), which is another worrying sign.

The fact that this system is only 18 months old and is untested means that there is little or no data available to analyse its suitability and long term effects to both staff and the Service. The FBU have repeatedly asked for Full **Equality Impact Assessments** (EIA's) to be carried out by LFRS to assess the welfare of its staff, however this continues to be ignored.

The FBU believe that there are significant equality issues surrounding this system, and by its design it **discriminates** against certain LFRS staff from being able work it, particularly female firefighters. Due to the huge amount of hours a week required to work and reside on the station, it is not a 'family friendly' duty system. Anyone with a young family or dependants is at a significant disadvantage if they wish to work this system. The fact that there are **zero female firefighters** currently working the system speaks volumes. The worry is as this system increases throughout the service, there will be fewer and fewer opportunities for women to work a family friendly shift pattern.

Furthermore, the fact that LFRS has chosen to crew 5 out its 11 whole-time stations in such a short space of time raises serious questions over its longevity and sustainability. Particularly if it is found to have adverse effects on staff and LFRS' overall **resilience**, both locally and nationally, which it is legally obliged to provide under the National Framework Document.

This system is also not a nationally approved shift pattern as agreed by the National Joint Council (NJC) 'Grey Book'. Therefore those that undertake it, have to sign out of that part of the 'Grey Book' and also more importantly have to sign out of the 'Working Time Directive' because the system vastly exceeds its requirements. However, LFRS staff that work this system can 'opt back in' to both the Grey Book and Working Time Regulations respectively at any point, which means LFRS have to provide them with a Grey Book shift pattern within 90 days.

If as the FBU predict, DCP becomes unsustainable for the future, due to operational burnout, fatigue, personal issues from working away from home for so long, or if there is a reduction in flexibility allowance. LFRS could face a situation where up to 70 firefighters may request to 'opt back in' to a Grey Book shift system. The question is where would LFRS put all these people within 3 months with only 4 remaining stations that operate a Grey Book system? This



lack of forethought is concerning, and could significantly impact the services delivery and resilience if this situation is ever realised.

Therefore LFRS' latest proposal to introduce the DCP system at Wigston station with the reduction of 14 firefighters raises further concern and questions surrounding funding, resilience and welfare. If realised, this would take the service up to 6 out of its 11 of whole-time stations reliant on this untested system.

Another concern is the cost of converting Wigston station to DCP status; it is estimated to be £1million of capital expenditure. However with the last DCP station at Castle Donington vastly over budget at £3.2 million (for a property it doesn't even own), the FBU have completely lost confidence in LFRS's capital expenditure programme. Particularly at a time when LFRS could be the first Fire and Rescue Service in history to make whole-time redundancies.

Even the Fire Minister, Penny Mordaunt, is quoted as being 'surprised' at the continuing 'expansive' capital expenditure path LFRS continues on. Especially after LFRS attended Parliament to ask for further government funding (welcomed by the FBU), but poorly timed, whilst huge controversial projects such as Castle Donnington Fire Station continued, and planning for Wigston underway.

With all of the welfare, funding, equality issues raised, the fundamental fact is that the public, particularly in Wigston will see a reduction of Firefighters at Wigston station from 24 to 14. LFRS are asking for the 14 remaining firefighters to do the work of 28, doubling the hours of work they must do, vastly increasing fatigue and operational burnout. This could have a significant impact on performance at operational incidents, potentially causing injury or death to both firefighters and the public.

It is therefore the FBU's view that this proposal to introduce DCP at Wigston station **should not** be implemented, allowing Wigston to continue to operate the safe, family friendly and nationally agreed system already in place.



Public Consultation Issues

It is vital that we raise our concerns over health & safety issues that we feel have been overlooked or ignored by LFRS managers, however we also feel it important to raise the numerous complaints and concerns that have been reported over the consultation itself, in the hope that LFRS can avoid making the same mistakes in the future.

Issues, complaints and concerns with ORS

One of the fundamental concerns and root of many of the issues is through the use of ORS to carry out the consultation. LFRS have paid in excess of **£30,000 for their services** at a time when we can ill afford to waste money.

The complaints started as soon as the consultation went live, many individuals could not access the consultation online, or spent considerable time completing the response only to get to the end and have all of their work deleted. We have no doubt that these frustrations have been widespread and will have an impact on the number of responses returned.

One of our members visited four Libraries in the Leicester City area to check the availability of the paper consultations.

- In one Library he eventually found a pile of questionnaires, with no IRMP document to provide the info, and no poster on display.
- In another Library he had to ask for assistance and after some searching he found the consultation & questionnaires, on a shelf, still wrapped in the poster with elastic band round them.
- In the next library an assistant had to ask a , who eventually found the IRMP consultation documents in a drawer, but had no questionnaires or poster.
- In the final Library they could not find the documents at all.
- None had return envelopes to return the completed questionnaires.

This is clearly unacceptable, local crews could have been instructed to visit libraries to check this very early on.

The next issues were with the consultation forums. Whilst in some cases quality is better than quantity, this is not always true, the forums were far too small to be considered a reasonable representation of their communities, they failed to be inclusive of disabled groups who may have difficulty attending, or families on low incomes that may not have access to a phone.

Despite numerous requests the FBU were kept away from all but 1 of the public meetings, and more concerning, FF's friends and family members were told they would not be used during the consultation forums, almost as if there was something to hide.

If a member of the public had requested to attend a public forum to request more information or debate the issues, they would not have been able to.



With only 2 meetings put on for staff on one day, anybody on duty or unavailable did not get the opportunity to attend a forum. Furthermore, insufficient time was allowed for the staff meeting which meant they were rushed.

In the future, there is nothing that ORS have provided that could not have been achieved by LFRS managers. Open public meetings should be provided in combination with smaller sample groups, more effort should be given to disabled and low income groups & members of representative bodies should be allowed to attend in an advisory capacity to provide a balanced argument.

Failure to fully or adequately undertake a legal public consultation

The FBU are also very concerned that the IRMP consultation document does not carry out consultation fairly and does not adhere to the fundamental principles for consultation commonly known as the Gunning principles.

The Gunning principles state that:

- i. Consultation must take place when the proposal is still at a formative stage;
- ii. Sufficient reasons must be put forward for the proposal to allow for intelligent consideration and intelligent response;
- iii. Adequate time must be given for consideration and response; and
- iv. The product of consultation must be conscientiously taken into account.

Below are the main areas of concern with the current IRMP consultation:

Consultation item 5, The Resilience Team

The resilience team were disestablished on 1st August 2014, and have not been available to provide **any** cover for resilience requests since that date.

The IRMP consultation document states,

*"we have increased our whole-time capability by opening new whole-time fire and rescue stations at both Birstall and at Castle Donnington. In addition one fire engine at Melton Mowbray is now crewed by whole-time day crewing staff from 07:00hrs to 18:00hrs. **This has clearly reduced the need and demand for the resilience team.**" (IRMP Consultation on Proposals for Change, 2015-2020, page 15)*

"...you will not see any change in the service we provide." (IRMP Consultation on Proposals for Change, 2015-2020, page 15)

The resilience team were requested 3603 between March 2013 and March 2014, 2303 of these requests were provided with operational cover for a total of 6700 hours. We do not have the comparison figures for previous years but we believe that the demand for the resilience team has increased recently due to the number of retained that have left the service and the difficulty in recruiting. None of these facts have been presented to the FBU or



stakeholders, neither has the disestablishing of the resilience team and impacts been discussed at Health and Safety committee.

Therefore the above statement is incorrect, misleading and is clearly designed to back up an already pre-determined and desired outcome to the consultation.

The fact that the resilience team have already been disestablished means that the proposal is clearly not still at the formative stage.

The fact that the reasons put forward are false does not allow for intelligent consideration or intelligent response.

Consultation item 3, Leicester City

The lack of a decision on exactly which station in the city would face losing an appliance means that those consulted could not possibly be allowed intelligent consideration and provide an intelligent response.

Furthermore, when questioned on this during the address of the CFO after the CFA meeting, he stated that he did not yet have the necessary information to make that decision.

How could a member of the public that lives in the city area intelligently consider what these proposals mean to them, as the proposals do not inform them if it is even their local station that would face the removal of an appliance?

Misleading statements and a distinct lack of information on the impact of these changes

Throughout the proposal, it is apparent that there are a number of unqualified sweeping statements and general assertions made. This manifests itself to some degree in the use of what could be described as "selective" use of data, this data being used to back up an already pre-determined and desired outcome to the consultation. The FBU notes that there is very little, if any detrimental/negative impacts of the proposals highlighted in the document.

Is it the service position that there **are not** any negative or detrimental impacts as a result of the proposals? The service have a legal requirement to give stakeholders a full and frank breakdown of what the proposals mean, this must include positive AND negative impacts, and must be backed up with sufficient information/data – not just charts to accentuate the positive – and data that is articulated in a manner that is understandable to all stakeholders; the "shopkeeper test".

Examples of the concerns the FBU highlight being language such as:

"Will still be appropriate to lessen the impact of any incidents in these areas" (IRMP Consultation on Proposals for Change, 2015-2020, page 7, 9 & 12)

What does this statement really mean? Does it imply a positive or detrimental impact? What is it relative to/measured against? How does a lay member of the public quantify this statement? It doesn't pass the "shopkeeper test".



Other examples of statements that the FBU believe are designed to mislead the public and to provoke a certain pre-determined response include:

“there is sufficient cover in the area to safely remove one fire engine from Loughborough” (*IRMP Consultation on Proposals for Change, 2015-2020, page 7*)

And:

“It is safe and feasible to remove the On-Call fire engine from Oakham without increasing risk to local people” (*IRMP Consultation on Proposals for Change, 2015-2020, page 9*)

And:

“It is safe and feasible to remove a fire engine from the city.” (*IRMP Consultation on Proposals for Change, 2015-2020, page 12*)

None of the proposals have been discussed at the Health & Safety committee, and the FBU firmly believe that the above statements are false.

Furthermore, despite numerous members raising their concerns on health & safety issues of these proposals, at various Early Bird meetings and other meetings, there is little or no information on the impact of these changes to the public or Firefighters. This lack of information does not allow for those being considered to intelligently consider and provide an intelligent response.

Questions

Although there are 16 questions contained within the original document, there are essentially 9 different questions with a number of these repeated and applied to different proposals.

Example 1: Were you aware or unaware that the number of emergency incidents in...had reduced substantially in recent years?

Example 2: Do you agree or disagree that we should target our community safety resources towards the most vulnerable people?

Example 3: Do you agree or disagree that it is reasonable to make necessary savings by removing...from...?

The FBU believe it is clear from the proposal that all of the questions are binary and closed questions and as such do not allow those consulted to give an accurate and intelligent reflection of their views. The FBU further believe that the questions are of a leading nature and are designed to provoke a certain pre-determined response. It is not always the question itself that creates a leading question; inappropriate response categories that do not allow a fair choice also create leading questions. Furthermore, any questions should never be taken in isolation; again the three example questions above and taken from the proposals, when grouped together, the FBU believe are designed to be leading in their intent.



The FBU believe there should be a wider breadth of questions and that contain a mixture of both open and closed questions, where the closed questions don't allow for just a binary response which of themselves narrow down the ability of those consulted to articulate their considered and intelligent response.

Just one example of the leading nature and restricted options to articulate a response is contained within example question 2 above:

“Do you agree or disagree that we should target our community safety resources towards the most vulnerable people?”

What responsible member of our communities would not back the question you raise, the real question is to what degree and in relation to other areas of service delivery, we as a FRS carry out, especially in a time of budget constraints. It should be made clear that increasing or maintaining certain areas of activity might necessitate reductions in other areas. It is also the case that a closed binary question does not allow for stakeholders to respond in a manner that reflects their intelligent consideration and response.

Another area of concern in relation to the framing of the questions and their leading and restricted nature is highlighted in example question 3 above:

“Do you agree or disagree that it is reasonable to make necessary savings by removing...from...?”

What is reasonable supposed to mean? What is this quantifiable against and in relation too, or in terms of what? Simply in terms of budget constraints? Or in terms of public safety? Or Firefighter safety?

The FBU are very disappointed that the service has proceeded with the consultation, and believe that the results of this consultation cannot be relied upon due to the points that we have raised.



Conclusion

The IRMP 'Proposals for Change 2015-2020' document is very misleading. Throughout the proposals, it is apparent that there are a number of **unqualified sweeping statements** and general assertions made. This manifests itself, to some degree, in the use of what could be described as "**selective**" use of data. This being; data used to persuade the reader that all of these proposals can take place with little or no impact to the safety of the public or to firefighters.

This is simply not the case. The common theme of concerns raised by firefighters is that these proposals are NOT safe to the public or Firefighters, and that LFRS, in a rush to balance the budget deficit, have failed to carry out adequate risk assessments to support the claims that these proposals are safe.

"When it comes to changing the number of fire engines you've got or how you crew them, you have to underpin that with very, very robust evidence before you do it"

The Audit Commission Case Study 4, seeing the light - Innovation in local public services May 2007.

Even the consultation itself has been rushed and not carried out adequately, with the FBU continuously having to raise failings with management but frequently being ignored.

Throughout this document we have presented an **indisputable argument** that these proposals will have a significant impact on the safety of the public and the safety of Firefighters. We have presented evidence to refute many of the misleading claims in the consultation document.

For example, we have presented the undeniable reasons that riding just 4 on appliances, which do not have immediate support, i.e. from a second appliance from the same station, is dangerous and unsafe. We have presented alternative figures to show that we have maintained 5 on an appliance (outside of the city) on **80%** of occasions, throwing into question the charts presented in the IRMP.

The suggested impact of response times for support appliances have been **proven to be inaccurate**. This has been achieved using freedom of information requests for LFRS actual statistics, therefore questioning the very statement that these proposals are achievable safely.

The fact that **no task/time analysis have been carried out by LFRS** (as instructed by HSG65 and the National Framework Document) to establish 'exactly' what are the implications of these proposals in terms of firefighter safety, public safety and incident outcome, has led to led to the FBU and firefighters to have to carry out their own task/time analysis using BROS, and the results are alarming.

We have explained why the other proposals of the ALP, Southern and Wigston all have a direct impact on the proposal to remove an appliance from the city; none of these risks have been adequately considered or assessed prior to consulting on these proposals.

The FBU have presented how indispensable the role of the resilience team was and the devastating impact on RDS appliance availability it had since the team were disbanded in August.



Finally, we have stated why we believe the crewing model of **DCP is unsustainable** and it is irresponsible for LFRS to recommend yet another station move to that duty system until it has been properly tested; and crews working that system conduct a full Equality Impact Assessment (EIQ) undertaken to ascertain the likely longevity of their decision to opt out of the working time directive.

These proposals have been ill thought-out and the risks have not been adequately assessed prior to the consultation, and we are very disappointed.

However, above all else, it is the **combined risks of these proposals**, and their exacerbating impact on each other that has also not been considered and is most concerning.

We absolutely cannot stand by and allow these dangerous proposals to be rushed through, and sacrifice the safety of the public of Leicester, Leicestershire and Rutland as well as its firefighters.

The FBU are very keen to work with management to develop **alternative proposals** to save money, proposals that have been adequately assessed and can be achieved safely. We have proposed ideas such as **collaborative working**, sharing departments, buildings, resources etc. to help to reduce our budget. In fact the sharing of our Fire Control with Nottinghamshire seems to be well underway, so why can we not progress with such efficiency for other departments?

You may be misled by reading this document that the FBU and its members are against change and progress; however nothing could be further from the truth. We have seen more change in the last few years than in decades of the fire service. We have embraced a new shift pattern despite it being against national FBU policy. We have seen the closure of 2 retained fire stations and the removal of the retained section at Loughborough, and have managed to get through almost 2 years of dispute with our national employers without significant incidents and hopefully still have a good working relationship with our management team.

However, our members **cannot allow these proposals to be accepted** and make no apologies for fighting for the safety of the people of Leicester, Leicestershire and Rutland.

It is regretful that the last 12 months could have been in vein if these proposals are rejected, however we must reject the significant proposals discussed in this report, and would recommend that we look to achieving the proposals to present a balanced budget for the next 12 – 18 months to give all parties the opportunity to work together on alternative suggestions.



Appendices

Appendix – 1 a) Introduction to 'BROS' Government Time/Task Analysis Planning Tool

For the last half of the 20th Century, the minimum level of fire service attendance at fires in the UK was defined by national standards of fire cover. These standards defined the number of appliances, the crew size and the attendance time.

At the beginning of the 21st Century, national standards of fire cover were abolished, and it was left up to each fire and rescue service to set its own standards. The type of fire appliances, the crew sizes and the attendance times could all be set locally.

It was believed that the old national standards of fire cover did not reflect the modern fire and rescue service and did not address the true risk within the community. Setting attendance parameters at the local level was intended to deliver a better service to the public.

However a *method* was required that would analyse modern fire and rescue service capabilities so that the effect of changes to attendance standards could be examined and assessed prior to implementation.

The *method* that was developed by government scientists was called the Brigade Response Options System (BROS).

Brigade Response Options System (BROS)

Although it is called a *system*, BROS is essentially a *process*. Computer software has been created to make the BROS process easier to put into practice, but it can just as easily be worked out on paper.

BROS is a timeline based task analysis process.

The available firefighters are listed down the left hand side of a table, and the passage of time is represented across the width of the table. See Figure 1.

| | 1 minute | 2 minutes | 3 minutes |
|-------------------|----------|-----------|-----------|
| Officer in charge | | | |
| Firefighter 1 | | | |
| Firefighter 2 | | | |
| Firefighter 3 | | | |
| Firefighter 4 | | | |

Figure 1. Task analysis table

The idea is that the activities undertaken by firefighters at an incident can be 'blocked in' to the table to show what each person is doing at any moment. This process is known as *task analysis*



This is not a process that produces results that are of 'engineering accuracy', but if the skill and judgement of a large number of professional firefighters is used to fill in the table, a realistic and justifiable outcome is obtained.

The BROS process is particularly useful for a number of reasons:

- BROS is not limited to attendance at fires. It can be used to assess the effect of attendance standards at any emergency incident.
- BROS can be applied to a 'typical' incident or it can be applied to a very specific case.
- BROS can be applied using 'typical' fire and rescue service resources or it can be applied using the known resources of a particular service or fire station.
- There are only as many rows on the table as there are firefighters. This avoids incorrect assumptions being made about the activities that can actually be carried out by the number of firefighters in attendance.
- The timeline encourages users to remember that certain activities cannot be started until other activities have been completed.
- The timeline makes it possible to work out the effect of actual attendance times of second and subsequent appliances just by adding more rows to the table at different times.

In very simple form, a table might look something like Figure 2 as it is completed:

| | 2 minute | | 4 minutes | | 6 minutes | |
|--|-----------------|--|---------------|--|-----------|---------------------|
| First appliance: | | | | | | |
| Officer in charge | Risk assessment | | Supervision | | Briefing | Supervision |
| Firefighter 1 | Pump operation | | | | | |
| Firefighter 2 | | | BA rescue | | | |
| Firefighter 3 | | | BA rescue | | | |
| Firefighter 4 | Supplying water | | Managing hose | | | 1 st aid |
| Second appliance: (arrival time 5 minutes after 1st appliance) | | | | | | |
| Officer in charge | | | | | Briefing | Com support |
| Firefighter 1 | | | | | | Firefighting |
| Firefighter 2 | | | | | | Firefighting |
| Firefighter 3 | | | | | | 1 st aid |

Figure 2. Task analysis table being completed.
Lag between 1st and 2nd appliance arrival is 5 minutes

A number of points must be considered at this stage:

Firefighter safety

BROS enables an analysis of firefighter safety to be undertaken in the earliest planning stages of attendance planning. As the rows in the table are filled in by professional firefighters, they will easily be able to identify issues of firefighter safety that place a demand on resources, after all, they are the trade experts. For example, at a motorway incident, it may be



necessary to allocate the activity of 'scene safety' to one person for the duration of the incident. This fills in one line of the table, and all of the other activities at the incident must be distributed amongst the remaining lines.

Firefighter physiology

Firefighter physiology must be taken into account when using the timeline approach of BROS. For example, if it is assumed that firefighters will be wearing breathing apparatus in arduous conditions, a period for recovery must be blocked into their timeline afterwards.

Resilience

If the table shows every single firefighters to be engaged in risk critical activity and/or activity critical to firefighter safety, it must be realised that the task being described is 100% reliant on all equipment working, and on all firefighters being uninjured and not distracted.

If a hose needs replacing, or a firefighter is injured or forced to control bystanders, other important tasks will be delayed.

It is therefore not a bad thing that there will be periods of time when some firefighters will not be allocated tasks within the table. This provides built-in resilience to ensure that an incident can be concluded successfully even if unplanned events occur.

Starting position and incident development

The initial scale of the incident and its growth or decline must constantly be kept in mind.

The BROS process does not consider the attendance time of the first appliance. (It would be possible to consider 'driving to the incident' as an activity, but attendance time should really be considered in a different way).

The important question is, exactly what will the first appliance in attendance be faced with?

If it is assumed that the attendance time of the first appliance will be 4 minutes, a fire will be a certain size. If it is assumed that the attendance time of the first appliance will be 8 minutes, a fire will be four times as big.

This is important because when considering tasks, a crew of five arriving at a fire after 4 minutes might be assumed to be enough to bring the fire under control. However a crew of five arriving at a fire after 8 minutes will have more tasks to perform – that will take longer – and they might NOT be able to bring the much larger fire under control.

Outcome

At the end of the task analysis, the expected outcome of the incident must be described. This may be in terms of casualties, fatalities and/or property damage¹.

For example, a successful outcome at a domestic house fire might be confining the fire to the room of origin; preventing spread to neighbouring property; no firefighter injuries and ensuring all casualties are rescued/led to safety.

¹ Property damage can include (but is not limited to) damage to buildings, damage to contents, lost heritage, business interruption, road congestion, environmental pollution, loss of crops or forestry.



For example, a successful outcome at a commercial property fire might be all of the above plus minimising firefighting runoff water into watercourses.

For example, a successful outcome at a road traffic accident might be scene safety secured at all times, all casualties extricated and taken to hospital within the 'golden hour', incident handed over to police within one hour.

When carrying out task analysis, it is easy for firefighters to become focussed in on firefighter safety being the only desired outcome and for other outcomes to be taken as read (like the fire being extinguished). However, taking this approach fails to distinguish between an effective attendance standard and a less effective standard.

For example, it is possible to use the BROS process on two different attendance standards to a 'typical' house fire:

1. A crew of 4 firefighters arriving 10 minutes after the time of call.
2. Two crews comprising 9 firefighters arriving 5 minutes after the time of call.

In both cases, professional firefighters could use task analysis to work out the activities that the available firefighters would perform. Arguably, both of these sets of activities *could* deliver firefighter safety and take firefighter physiology into account.

However, if the starting position of the fire and its development are continuously assessed, it would inevitably be concluded that the *outcome* of the former attendance standard would be significantly worse than the outcome of the latter.

| | 2 minute | | 4 minutes | | 6 minutes | |
|---|--|--|-----------------------------------|--|-----------|---|
| First appliance: | | | | | | |
| Officer in charge | Risk assessment | | Supervision | | Briefing | Supervision |
| Firefighter 1 | Pump operation | | | | | |
| Firefighter 2 | | | BA rescue | | | |
| Firefighter 3 | | | BA rescue | | | |
| Firefighter 4 | Supplying water | | Managing hose | | | 1 st aid |
| Second appliance: (arrival time 5 minutes after 1 st appliance) | | | | | | |
| Officer in charge | | | | | Briefing | Com support |
| Firefighter 1 | | | | | | Firefighting |
| Firefighter 2 | | | | | | Firefighting |
| Firefighter 3 | | | | | | 1 st aid |
| Incident development: | | | | | | |
| | Ground floor room post flashover | | Fire spread beyond room or origin | | | Casualty rescued. Start of firefighting |
| Incident outcome: | Fire contained to floor of origin, smoke damage to 100% of property, casualty rescued and resuscitation carried out at scene | | | | | |

Figure 3. Completed task analysis table showing firefighter tasks, the starting position, the development of the incident, and the incident outcome



Appendix 1 b) Applying BROS to Loughborough and Oakham Fire Stations

Leicestershire FBU are very disappointed that after repeatedly asking LFRS to provide their legal obligation of 'Time/Task/ Risk analysis' for these proposals, as per Health & Safety requirements and the National Framework Document, **LFRS have failed to do so**. The FBU believe that it has not been carried out because it would highlight the grossly increased risk to both the public and its firefighters.

Therefore it has been left to the FBU and LFRS Firefighters to carry-out this vital Time/Task/Risk analysis. Firefighters at Oakham and Loughborough recently conducted a BROS scenario at their respective stations. It involved following the key principles (mentioned previously) to determine the outcomes to the same scenario but with two key differences:

- The outcome with the 'current crewing' and fire engine arrangements
- And**
- The outcome with the 'proposed crewing' and fire engine reductions

Every individual firefighter has their own experiences that they bring to BROS task analysis, so one person cannot complete this task alone. When enough firefighters are involved in the development of a BROS table, the result is an excellent reflection of reality. After all, who knows how long a piece of hose takes to run out, or a BA set to Don, better than firefighters themselves.

Therefore for every fire ground task, an average was taken from all the firefighters who took part (20 from each station), this allowed an 'agreed' time for all tasks to be determined and applied to each scenario (both current and proposed crewing), ensuring its fairness.

After completing the two different crewing models for the same scenario, they then analysed and compared the two incident outcomes; the results were devastating.


The results showed that with the proposed crewing changes applied to the incident outcomes, they were vastly different. In Loughborough's scenario, it took **a further 14 minutes** to rescue the casualties from the balcony and the casualty trapped in the flat wasn't reached for 20 minutes and subsequently died. Fire spread would have completely gutted the entire property and left neighbouring properties uninhabitable.

Compare that with what actually happened, because **this scenario was a real incident** that Loughborough did attend on Victoria Street, and it indicates a huge difference in the life saving action Loughborough did take compared to the limited action they could take if these proposals go ahead. (See appendix 1.1 and 1.2 for the full incident analysis)


The situation is **even worse** for the Oakham Scenario, which again was a real incident that their crews attended in Empingham. With the loss of Oakham's second fire engine, the next attending appliance would take **a devastating 17 minutes** compared to the 5 minutes it did actually take. This would have huge implications on the incident outcome, leaving Oakham's crew to 'defensively' firefight, in the face of huge moral pressure to act from the public. (See appendix 1.3 and 1.4 for full incident analysis)


The FBU believe that these BROS scenarios demonstrate the **increased risk** to both the public and firefighters, and by introducing these proposals, LFRS would be knowingly placing both at much greater risk.

Scenario BEFORE proposed changes


| | | | | | | | | | | |
|---|---|-----------------------------|--------------|--|----------------|---|--|-----------------------|--|---------------------------|
| Scenario: 0730 hrs - Victoria Street, Loughborough. FLAT FIRE 2 appliances mobilised from Loughborough. The address is 3 storey blocks of flats, with 5 ground floor flats and 5 massionettes on the first/second floors, access to these is from a communal first floor balcony to the rear of the premises. | | | | | | | | | | |
|  | | | | | | | | | | |
| Time (min): 5 10 15 20 25 | | | | | | | | | | |
| Fire Appliance 1 | | | | | | | | | | |
| OiC 1 | Incident command / Info gathering | | | Brief BA Teams | | Incident Command / Risk Assessments / Establish Cause | | | | |
| | | | | | | | | | | |
| Ff 1.1 | Engage pump | Don fire kit | Ass. message | Provision of water - hydrant | | Pump Operator | | | | |
| | | | | | | | | | | |
| Ff 1.2 | Provision of water - main jet | | BA | Brief BA Teams | | Gain entry / hose aloft | BA - Firefighting & Search | | RESCUE | BA - Search & ventilation |
| | | | | | | | | | | |
| Ff 1.3 | Provision of water - main jet | | BA | Brief BA Teams | | Gain entry / hose aloft | BA - Firefighting & Search | | RESCUE | BA - Search & ventilation |
| | | | | | | | | | | |
| Ff 1.4 | Provision of water - hose reel | | Set up ECO | | Brief BA Teams | | Gain entry / hose aloft | Entry Control Officer | | |
| | | | | | | | | | | |
| Fire Appliance 2 | | | | | | | | | | |
| OiC 2 | Brief from OiC 1 & 360 info gathering | | | RESCUES using short extension ladder | | | Sector Commander | | | |
| | | | | | | | | | | |
| Ff 2.1 | Don fire kit | Provision of water from 2nd | | Provision of water - hydrant | | Command Support | | | | |
| | | | | | | | | | | |
| Ff 2.2 | Slip & pitch a short extension ladder | | | RESCUES using short extension ladder | | | Casualty handling area | | First Aid / CPR | |
| | | | | | | | | | | |
| Ff 2.3 | Slip & pitch a short extension ladder | | | Provision of water - safety jet | | Safety Jet | | First Aid / CPR | | |
| | | | | | | | | | | |
| Ff 2.4 | Currently only 4 on 2nd appliance at Loughborough | | | | | | | | | |
| Incident conditions: | Well developed fire in 1st floor flat, front room fully involved in fire, flames issuing from window and heavy smoke logging. 5 casualties trapped by the fire on balcony to rear of premises. Slight knock down of fire with main jet in window. | | | 1 person reported in flat on fire, BA teams briefed and committed. Fire under control on entry, flat heavily smoke logged with pockets of remaining fire. 2nd pump crew rescue 5 casualties from 1st floor balcony and provide a safety jet. | | | Casualty located & rescued from 2nd floor of flat on fire, CPR administered to revive casualty. Fire extinguished, severe fire damage to front room. | | Remainder of flat searched, no further casualties. Slight spread and fire damage to hall and kitchen of property, fire contained to floor of origin. | |
| Outcome: | On arrival the fire was well established, the fire was knocked down using a main jet, this enabling crews to enter the flat quickly. In 6 minutes 5 casualties were rescued that were trapped by the fire. A further casualty was rescued from the flat involved in fire after 17 mins, and was resuscitated before being taken to hospital. Fire was contained to floor of origin, with room of origin severely damaged by fire, slight fire spread to hall and kitchen. Smoke damage to remainder of flat. No fire spread to adjoining flats. | | | | | | | | | |

Appendix 1.2 - BROS - carried out by crews at Loughborough Station - Scenario AFTER proposed changes


| | | | | | | | | | | | |
|---|--|--------------|-----------------------------|---|---------------------------------------|---------------------------------|--|-----------------------|-------------------------|----------------------------|--|
| Scenario: | 0730 hrs - Victoria Street, Loughborough. FLAT FIRE | | | | | | | | | | |
|  | 1 appliance mobilised from Loughborough, 2nd appliance from Shepshed or Birstall. The address is a 3 storey blocks of flats, with 5 ground floor flats and 5 massionettes on the first/second floors, access to these is from a communal first floor balcony to the rear of the premises. | | | | | | | | | | |
| Time (min): | 5 | | 10 | | | 15 | | 20 | | 25 | |
| Fire Appliance 1 | | | | | | | | | | | |
| OiC 1 | Incident command / Info gathering | | | | Brief BA Teams | | Incident Command / Risk Assessments / Establish Cause | | | | |
| | | | | | | | | | | | |
| Ff 1.1 | Engage pump | Don fire kit | Ass. message | Provision of water - hydrant | | | Pump Operator | | | | |
| | | | | | | | | | | | |
| Ff 1.2 | Provision of water - main jet | | | BA | Brief BA Teams | | Slip & pitch a short extension ladder | | Gain entry / hose aloft | BA - Firefighting & Search | |
| | | | | | | | | | | | |
| Ff 1.3 | Provision of water - hose reel | | | BA | Brief BA Teams | | Slip & pitch a short extension ladder | | Gain entry / hose aloft | BA - Firefighting & Search | |
| | | | | | | | | | | | |
| Ff 1.4 | PROPOSAL FOR ONLY 4 ON AN APPLIANCE | | | | | | | | | | |
| Fire Appliance 2 | | | | | | | | | | | |
| OiC 2 | | | | | Brief from OiC 1 & 360 info gathering | | RESCUES using short extension ladder | | | | |
| | | | | | | | | | | | |
| Ff 2.1 | PROPOSAL TO REMOVE 2ND APPLIANCE FROM LOUGHBOROUGH - 10 MIN TIME LAG FOR ATTENDANCE OF NEXT APPLIANCE | | | | | | | | | | |
| | Don fire kit | | Provision of water from 2nd | | | Provision of water - safety jet | | | Sector Commander | | |
| Ff 2.2 | Provision of water - safety jet | | | | | | RESCUES using short extension ladder | | | Cas Han. | |
| | | | | | | | | | | | |
| Ff 2.3 | Set up ECO | | Receive brief BA Teams | | | Gain entry / hose aloft | | Entry Control Officer | | | |
| | | | | | | | | | | | |
| Ff 2.4 | Currently only 4 on 2nd appliance at Loughborough | | | | | | | | | | |
| Incident conditions: | Well developed fire in 1st floor flat, front room fully involved in fire, flames issuing from window and heavy smoke logging. 5 casualties trapped by the fire on balcony to rear of premises. Fire spread on 1st floor of property. | | | 1 person reported in flat on fire, BA teams briefed and pitch short extension ladder to gain access. Fire apread to 2nd floor, ground floor well alight, flat heavily smoke logged. 5 casualties remain on 1st floor balcony in safe air, risk of fire spread to adjoining flats. | | | BA team committed to carry out rescue, difficulty gaining access due to fire spread. Heat & smoke damage affecting neighboring properties. Short extension ladder used to carry out rescues of 5 casualties from balcony suffering from smoke inhalation. Fire started to be brought under control using main jet through window, BA teams progress difficult. | | | | |
| Outcome: | On arrival the fire was well established, the fire spread to remainder of first floor and landing of 2nd floor. BA teams gained access after 17 minutes. 5 casualties were rescued after 20 minutes. Fire spread to whole of first floor, with room of origion severely damaged by fire, severe fire spread to hall and kitchen. Fire, heat and smoke damage to remainder of flat. Heat & smoke damage to adjoining flats. | | | | | | | | | | |

| | | | | |
|-------------------------|---|---|----|----|
| Scenario: | ...Continued from previous sheet | | | |
| |  | | | |
| Time (min): | 25 | 30 | 35 | 40 |
| Fire Appliance 1 | | | | |
| OiC 1 | Incident Command / Risk Assessments / Establish Cause | | | |
| Ff 1.1 | Pump Operator | | | |
| Ff 1.2 | RESCUE | BA - Firefighting, search & ventilation | | |
| Ff 1.3 | RESCUE | BA - Firefighting, search & ventilation | | |
| Ff 1.4 | PROPOSAL FOR ONLY 4 ON AN APPLIANCE | | | |
| Fire Appliance 2 | | | | |
| OiC 2 | Sector Commander | | | |
| Ff 2.1 | Command Support | | | |
| Ff 2.2 | Casualty handling area | First Aid / CPR | | |
| Ff 2.3 | Entry Control Officer | | | |
| Ff 2.4 | Currently only 4 on 2nd appliance at Loughborough | | | |
| Incident conditions: | Casualty located on first floor and rescued from building, CPR administered but unable to revive. Fire extinguished after a further 5 minutes of firefighting. Fire spread 2nd floor of property. | | | |
| Outcome: | A further casualty was rescued from the flat involved in fire after 26 mins, and was unable to be resuscitated. Casualty confirmed deceased on arrival at hospital. | | | |

Appendix 1.3 - BROS - carried out by crews at Oakham Station - Scenario BEFORE proposed changes

| | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|--|--------------------------------------|---------------|-----------------|--|---|-----------------|------------------------|---|-------------------------|------------------|-----------|--|-------------------------------------|--|--------------------------------|---|----|----|----|--|--|--|--|--|
|  <p>Scenario:</p> | <p>EMPINGHAM HOUSE FIRE AT 21.15HRS ON 3/6/14. PROPERTY IS SEMI DETACHED, NO PERSONS REPORTED. FIRST APPLIANCE S33P1 FROM OAKHAM FIRE STATION ARRIVED ON SCENE 9 MINUTES AFTER BEING MOBILISED. THEY WERE MET BY A BIG CROWD OF PEOPLE STANDING OUTSIDE WATCHING LARGE FLAMES COMING OUT OF A FIRST FLOOR WINDOW.</p> <p>THE SECOND APPLIANCE S33P2 ALSO FROM OAKHAM FIRE STATION ARRIVED AT THE INCIDENT 4 MINUTES AFTER S33P1.</p> | | | | | | | | | | | | | | | | | | | | | | | | |
| Time (min): | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 | | | | | |
| Appliance 1 | | | | | | | | | | | | | | | | | | | | | | | | | |
| OiC 1 | INFO GATHERING | | | BRIEF BA TEAM 1 | | | BRIEF OIC 2 | | | INCIDENT COMMAND DUTIES | | | | | | | | | | | | | | | |
| Ff 1.1 | DRIVER KIT ON | LOCATE + GET WATER SUPPLY | | | ASSIST JETS | | | PUMP OPERATING DUTIES | | | | | | | | | | | | | | | | | |
| Ff 1.2 | DON BA SETS | RUNNING OUT COVERING JET AND H/R JET | BRIEF FROM IC | | | BA TEAM 1 COMMITTED INTO RISK ARE FOR FIRE FIGHTING | | | | | | | | | | | | | | | | | | | |
| Ff 1.3 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Ff 1.4 | DON ECO TABARD | BRIEF FROM IC, CHECK BA TEAM 1 | | | BAECO STAGE 1 DUTIES | | | | | | | | | | | | | | | | | | | | |
| Appliance 2 | | | | | | | | | | | | | | | | | | | | | | | | | |
| OiC 2 | Current situation - 4 Minute time lag for attendance of 2 nd appliance | | | | | BRIEF FROM OIC 1 | | | BRIEF BA TEAM 2 | | | 360 CHECK | | SET UP CASUALTY AND BA SERVICE AREA | | | ASSISTED WITH OIC 1 AND USING JETS | | | | | | | | |
| Ff 2.1 | | | | | | FEED INTO APPLIANCE 1 | | COMMAND SUPPORT DUTIES | | | | | | | | | | | | | | | | | |
| Ff 2.2 | | | | | | DON BA SETS | RUN OUT H/R JET | | | REPORT TO ECP | | | BRIEF FROM OIC 2 | | BA TEAM 2 COMMITTED TO NEXT DOOR PROPERTY FOR FIRE FIGHTING AND TO STOP THE FIRE SPREADING | | | | | | | | | | |
| Ff 2.3 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Ff 2.4 | | | | | | BRIEF FROM OIC 1 | | | | | RAN OUT MAIN JET | | | PITCHED LADDER | | USED MAIN JET OUTSIDE BUILDING | | | | | | | | | |
| Incident conditions: | FULLY DEVELOPED FIRE ON THE FIRST FLOOR, BROKE THROUGH 1 BEDROOM WINDOW | | | | FIRE SPREAD TO LANDING AND ROOF SPACE. FIRE PROGRESSED TO G/FLOOR DUE TO BURNING THROUGH THE FLOORBOARDS | | | | G/FLOOR FIRES INITIALLY SURPRESSED BY BA TEAM 1 | | | | BA TEAM 1 ON FIRST FLOOR ATTEMPTING TO CONTROL AND EXTINGUISH FIRES IN ROOF, LANDING AND 4 ROOMS | | | | BA TEAM 2 STOPPING FIRE IN NEXT DOOR ROOF SPACE | | | | | | | | |
| Outcome: | A CREW OF 5 ON OAKHAM'S FIRST APPLIANCE ENABLED THEM TO COMMIT INTO PROPERTY 1 AND STOP THE FIRE DESTROYING THE G/FLOOR. LATER MANY ITEMS WERE SALVAGED. THE PROMPT ARRIVAL OF THE SECOND APPLIANCE FROM OAKHAM ENABLED A SECOND BA TEAM TO ENTER THE ADJACENT PROPERTY AND STOP THE FIRE SPREADING AND DESTROYING IT. | | | | | | | | | | | | | | | | | | | | | | | | |

Appendix 1.4 - BROS - carried out by crews at Oakham Station - Scenario AFTER proposed changes

| | | | | | | | | | | | | | | | | | | | | |
|--|--|--------------|--------------------|----------------------------|---|---|-----|---------------------|---|------------------|----|---------------------|----|----|----|---|-------------------------------|--------------------------|-------|---------------|
|  <p>Scenario:</p> | EMPINGHAM HOUSE FIRE AT 21.15HRS ON 3/6/14. PROPERTY IS SEMI DETACHED, NO PERSONS REPORTED. FIRST APPLIANCE S33P1 FROM OAKHAM FIRE STATION ARRIVED ON SCENE 9 MINUTES AFTER BEING MOBILISED. THEY WERE MET BY A BIG CROWD OF PEOPLE STANDING OUTSIDE WATCHING LARGE FLAMES COMING OUT OF A FIRST FLOOR WINDOW. THE SECOND APPLIANCE IN THE BEST CASE SCENARIO WOULD BE FROM UPPINGHAM AND WOULD TAKE AN EXTRA 17 MINUTES TO ARRIVE. | | | | | | | | | | | | | | | | | | | |
| | Time (min): | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 |
| Appliance 1 | | | | | | | | | | | | | | | | | | | | |
| OiC 1 | INFO GATHERING | | | DECISION MAKING | BRIEF CREWS | | 360 | DEALING WITH PUBLIC | | RE-EVALUATE PLAN | | ASSIST IN FF DUTIES | | | | | | BRIEF | OIC 2 | BRIEF BA TEAM |
| Ff 1.1 | DON FIRE KIT | LOCATE WATER | RUN FEED INTO PUMP | | PUMP OPERATOR DUTIES ALONGSIDE COMMAND SUPPORT DUTIES | | | | | | | | | | | | | | | |
| Ff 1.2 | RUNNING OUT HOSE, PREPARING FOR DEFENSIVE FIREFIGHTING | | | OBTAINING BRIEF FROM OIC 1 | | DEFENSIVE FIREFIGHTING FROM OUTSIDE, DEALING WITH PRESSURE FROM THE PUBLIC. | | | | | | | | | | | DON BA SETS AND REPORT TO ECB | RECEIVE BREIF FROM OIC 1 | | |
| Ff 1.3 | | | | | | | | | | | | | | | | | | | | |
| Ff 1.4 | PROPOSAL FOR ONLY 4 ON AN APPLIANCE | | | | | | | | | | | | | | | | | | | |
| Appliance 2 | | | | | | | | | | | | | | | | | | | | |
| OiC 2 | PROPOSAL TO REMOVE 2ND APPLIANCE FROM OAKHAM - 16 MIN TIME LAG FOR ATTENDANCE OF NEXT APPLIANCE | | | | | | | | | | | | | | | RECEIVE BRIEF | | | | |
| Ff 2.1 | | | | | | | | | | | | | | | | TAKE OVER COMMAND SUPPORT ROLE | | | | |
| Ff 2.2 | | | | | | | | | | | | | | | | RUN FEED INTO APPLIANCE 1, ASSIST IN FIREFIGHTING | | | | |
| Ff 2.3 | | | | | | | | | | | | | | | | DON ECO TABARD AND BAECO STAGE 1 DUTIES | | | | |
| Ff 2.4 | | | | | | | | | | | | | | | | PROPOSAL FOR ONLY 4 ON AN APPLIANCE | | | | |
| Incident conditions: | FULLY DEVELOPED FIRE ON 1 ST FLOOR OF BUILDING. CREWS MET BY LARGE FLAMES COMING OUT OF A BEDROOM WINDOW THAT HAD BROKEN DUE TO THE HEAT. | | | | | FIRE ATTACKED EXTERNALLY BUT NOT INTERNALLY SO FIRE SPREADS TO GROUND FLOOR | | | | | | | | | | BUILDING WOULD BE DESTROYED BY FIRE | | | | |
| Outcome: | DUE TO OAKHAM'S ONLY APPLIANCE ATTENDING THE INCIDENT WITH 4 CREW MEMBERS, THEY WERE UNABLE TO ENTER THE BUILDING (RADIP DEPLOYMENT CRITERIA WAS NOT MET). THEY HAD TO INSTEAD FIGHT THE FIRE EXTERNALLY INITIALLY THROUGH ONE BEDROOM WINDOW. THIS LED TO THE FIRE SPREADING FROM THE FIRST FLOOR TO THE GROUND FLOOR. BECAUSE OAKHAM'S SECOND APPLIANCE HAS BEEN REMOVED BY THE PROPOSALS THE NEXT NEAREST APPLIANCE HAS COME FROM UPPINGHAM, WHICH IF AVAILABLE WOULD TAKE AT LEAST 17 MINUTES LONGER TO ARRIVE. DUE TO THE DELAY IN CREWS BEING COMMITTED INTO THE BUILDING (DUE TO THE REMOVAL OF THE 5 TH CREW MEMBER FROM S33P1 AND S33P2 ENTIRELY) THE FIRE DESTROYED THE BUILDING OF ORIGIN. THIS ALSO LED TO THE FIRE SPREADING TO THE ROOF OF THE ADJACENT PROPERTY AND CAUSING SIGNIFICANT FIRE DAMAGE. | | | | | | | | | | | | | | | | | | | |