

ANNEX H

Response to the “FBU Response to Leicestershire Fire and Rescue Services IRMP Proposals for Change” (December 2014)

1. Purpose

The purpose of this document is to set out the Leicestershire Fire and Rescue Service (LFRS) management response to the issues and points that are raised in the Fire Brigades' Union (FBU) document “FBU Response to Leicestershire Fire and Rescue Services IRMP Proposals for Change” (December 2014).

In setting out this response and in order to establish a coherent structure, account is afforded to the following themes:

- The Consultative process
- The proposal to disestablish the Resilience Team
- The proposal to introduce the Day Crewing Plus (DCP) duty system at Wigston Fire and Rescue Station
- The proposal to remove one wholetime crewed fire appliance from the city area
- The proposal to remove one wholetime crewed fire appliance from Loughborough Fire and Rescue Station
- The proposal to remove the On-Call crewed fire appliance from Oakham Fire and Rescue Station
- The proposal to reduce standard wholetime crewing on fire appliances from five to four
- Firefighter and public Safety

2. The Consultative Process

The general theme of the FBU response associated with the consultative process is that it has not been effective or appropriate.

It is contended that LFRS was irresponsible in spending public funds to commission Opinion Research Services (ORS) to undertake part of its consultation programme and to write an independent report. In fact, LFRS has only ever sought to ensure that it has fulfilled all of its legal obligations to provide a fair and accessible consultation programme. In particular, by conducting independently facilitated discussions with a wide range of the public and stakeholders (including three meetings with its firefighters and staff) to examine in-depth their opinions and arguments about the draft proposals. ORS provides such services for a wide range of fire and rescue services (including Berkshire, Buckinghamshire and Milton Keynes, Dorset, Merseyside, Nottinghamshire, West Sussex and Wiltshire) as well as for many other public bodies. In this case, ORS believe the process worked well and will inform the consultation report.

The FBU complains that it was unable to attend most of the forums and that its members and others, with a very close connection with LFRS were ineligible to attend. In fact, it is standard good practice to exclude those with a direct personal interest in the issues from attending forums which are intended for members of the general public. It is important for members of the public in forums to be able to consider the issues in a thoughtful way, without feeling pressurised or caught between competing 'sides'. It is also relevant that the FBU is not the only union with an interest in the issues, and it is arguable that if it were to have attended, then the other unions should have been included. Moreover, in this case, the FBU's viewpoint was not wholly excluded, for its members picketed several of the meetings (in a polite and entirely non-offensive way) and expressed their points of view to those arriving for the discussions. In addition, the facilitator answered forum participants frankly, when asked about firefighters' views on the draft proposals.

A further consideration is that the FBU has many other routes through which to express its views. Apart from its campaigns in the public media about the draft proposals, it is regularly and systematically consulted by LFRS about all important matters. The union has also made a substantial submission, and its members (and in some cases its representatives) have participated in three lengthy forums facilitated by ORS with LFRS firefighters, staff and middle managers. In other words, the FBU was not excluded and its points of view were not disregarded.

The FBU state that the forums were rushed and too few people had the opportunity to take part. In fact, the meetings were not hurried in any way, but lasted in each case about three-and-a-half hours, so there was plenty of time for those there to express their points of view in detail. The notes taken at the forums then provided the basis for ORS's report of firefighters' views. During, and at the end of the meetings with firefighters, there were no complaints about discussions having been rushed or in any way superficial. In fact, the ORS facilitator was complimented and thanked by several participants and the lengthy meetings ended in each case on a positive note. The same was also true of the equally in-depth forum with middle managers.

The FBU also state that too few firefighters were able to take part in the forums due to being on duty. Of course, such meetings should be as inclusive as possible, but there will always be some practical limitations on the numbers able to take part in detailed and lengthy forums. In this case, a total of 55 LFRS employees attended the deliberative forums. Moreover, those that attended were able to explain their objections to the draft proposals in a detailed, measured, clear and emphatic manner. There is no reason to think that important considerations and issues went without notice. All LFRS employees had the opportunity to use the online questionnaire and to make submissions in order to express their views. The forums, whilst important, were only one part of an extensive consultation process.

The FBU also raises the issue about LFRS's design and distribution of the consultation questionnaire, and about initial difficulties some people apparently had in using the online questionnaire. There are always practical difficulties in distributing questionnaires, but there is no reason to think that the process was not conscientious or failed to be inclusive. Secondly, the LFRS questionnaire has been conducted in accordance with the National Framework and the public law duty of fairness for such documents in: (a) providing clearly formulated questions, (b) allowing respondents to express their views on the issues and (c) not leading them to a particular point of view. In this case, the questions were designed (i) to remind respondents of key relevant information while

posing clear questions and (ii) to distinguish between views on general principles and specific draft proposals. Contrary to the FBU view, quantitative questionnaires of this kind typically use closed questions, but the LFRS version included open-ended invitations also allowing respondents to make textual comments as well.

Overall, the FBU argues that LFRS's consultation was fatally flawed because it misled the public on some key issues.

In summary, having examined the points and issues raised by the FBU, it can be concluded that although reasonable challenges, they are supported by no evidential substance. The programme of consultation has been both proportionate and thoughtful. This refutes the view that the employment of ORS to carry out qualitative stakeholder forums represented poor value for money. The position, in fact, is the very opposite, as the process enabled the CFA to fulfil their legal obligations to provide a fair, accessible and independently facilitated consultation programme.

3. The Proposal to Disestablish the Resilience Team

The general theme of the FBU response associated with the proposal to disestablish the Resilience Team is that to do so will negatively impact upon the availability of fire appliances crewed by staff working in accordance with the On-Call duty system.

In the first instance, the FBU have made claims on many occasions that the Resilience Team were disestablished on 1 August 2014. This is strongly refuted on the basis that it has not been disestablished. Since August 2014, the Resilience Team has been mainly deployed to assist in the delivery of the transitional arrangements that are taking place at Southern Fire and Rescue Station, to amalgamate the fire and rescue and technical rescue functions. Once the transition arrangements have been completed, the Resilience Team role will revert back to supporting the availability of wholetime and On-Call duty system crewed fire appliances. The changes to the crewing arrangements at Southern are being successfully completed with the full involvement of the FBU. Therefore it is unlikely that the FBU were not aware of the use of the Resilience Team at this time.

The FBU also contend that since August 2014, following the deployment of the Resilience Team to Southern, that there has been a significant increase in On-Call fire appliances being unavailable. Whilst it is acknowledged that there has been a slight reduction in appliance availability, it has to be noted that one of the main factors to current unavailability of appliances was caused as a result of strike action due to the ongoing dispute between the FBU and the Government. In the 2014-15 year to date, unavailability due to strike action equates to just over 3,000 hours.

Further to this, it is also contended that the FBU is fully aware that a resilience factor is built into every duty system operated in LFRS to ensure that there are sufficient numbers of staff to cover absences caused by sickness and other leave etc. Where there are unforeseen circumstances and crewing falls below the required level, then this is addressed by implementing alternative crewing arrangements i.e. use of pre-arranged overtime and detachments. This arrangement has been negatively impacted by the action short of strike action that has been implemented by the FBU since May 2014. Where there is a risk or possibility of an appliance becoming unavailable every effort is, and will continue to be made, to address that situation through the use of all available resources. Historically, in certain areas, recruitment to On-Call stations has proved to be very challenging. However, this is being addressed through the introduction of a

more flexible approach to employment. Potential and existing staff are now able to better tailor their availability in relation to the hours of cover they provide and this will mean that (a) recruitment and retention of new and existing staff should improve, and (b) overall appliance availability should increase. This new flexible approach has been discussed and agreed with the FBU.

Reliance on the Resilience Team to maintain fire appliance availability has been reduced following the closure of Syston and Moira Fire and Rescue Stations. In addition to this, service provision has been enhanced by the opening of the new wholetime stations at Birstall and Castle Donington and by upgrading the duty system at Melton Fire and Rescue Station to the Day Crewing duty system.

In conclusion, it is envisaged that fire appliance availability should not be substantially affected by the disestablishment of the Resilience Team. The current levels of unavailability are slightly higher than would normally be anticipated because of a number of reasons as discussed earlier in this document. Furthermore, as part of future operational planning considerations, further emphasis will be placed on improving the On-Call duty system arrangements that should, in turn, provide for opportunities to achieve higher levels of availability.

4. The Proposal to Introduce the Day Crewing Plus Duty System at Wigston Fire and Rescue Station

The general theme of the FBU response associated with the proposal to introduce the DCP duty system at Wigston Fire and Rescue Station is that the duty system is unsustainable and that it has a detrimental impact on the health and welfare of staff who are employed to work it.

The FBU's claim that the DCP duty system is unsustainable is not based on any factual or evidence based analysis. LFRS has employed the DCP duty system for twenty-two months and it is currently operating at five fire and rescue station locations. All stations are established to the maximum authorised levels (seventy members of staff in total) and there are approximately forty-six applications pending for transfer to this duty system.

The FBU also assert that the DCP duty system will lead to operational burn out of staff. This is a point that was raised by the FBU during the early stages of agreeing the new duty system and as such, a strategy to monitor the effects of fatigue and stress on staff was agreed jointly by the FBU and management. Consequently, as an integral part of the implementation arrangements, Loughborough University have been employed to undertake a detailed analysis of the impact of the duty system on employees. This analysis has identified that the levels of fatigue and stress exhibited by staff who work in accordance with the DCP duty system has actually reduced since moving to the new duty system arrangements. Therefore, the FBU's assertion relating to burn out is not valid.

The FBU further contends that sickness levels amongst staff who are conditioned to work the DCP duty system are higher than those exhibited by staff who work in accordance with the wholetime shift duty system. An analysis of all relevant data demonstrates that the opposite is true. Sickness levels amongst staff who are conditioned to work the DCP duty system are lower than those exhibited by staff who work in accordance with the wholetime shift duty system.

In addition the FBU state that they have repeatedly requested that a full equality impact assessment be carried out in relation to the duty system. The duty system arrangements have been the subject of a partial equality impact assessment that was jointly completed by the FBU and managers before it was published. The partial equality impact assessment identified that there was no justifiable reason to complete a full assessment.

Following on from the above point, the FBU also asserts that the DCP duty system discriminates against certain members of staff because it is not family friendly. There is no evidence to support the point the FBU raises, the recent study undertaken by Loughborough University actually contradicts this thinking.

The observation made by the FBU in respect of the fact that the duty system is not a nationally approved shift system, as agreed by the National Joint Council, is not contended. All members of staff who are conditioned to this duty system do so on a voluntary basis. The duty system has become very popular amongst the operational workforce and as stated earlier, all stations operating it are at full establishment and there are approximately 46 transfer requests pending.

Finally, the FBU contends that there are serious questions over the future pension burden of this system, and the continuing rising capital expenditure surrounding it. In respect of this statement, the point is not valid in relation to the IRMP consultation.

5. The Proposal to Remove One Wholtime Crewed Fire Appliance From the City Area

The general theme of the FBU response associated with the proposal to remove one wholtime crewed fire appliance from the city area is that it will present increased risk to firefighter and public safety.

In their response, the FBU state that removing a fire engine from the city will increase the risk to the people who live, work and commute through the city area. From the narrative provided, it is concluded that the FBU make this assertion on the basis of increased traffic congestion and indicative proposals to increase city living. Neither of these factors will necessarily result in an increase in overall risk. Notwithstanding the fact that the population of the city has been slowly increasing year on year for the last five years, and the total number of emergency incidents attended has reduced by 26% during the same period. Furthermore, when analysed in detail, not only has demand dropped, the vast majority of incidents (59%) during this period have only required the attendance of one fire appliance. In total, nine wholtime crewed fire appliances and one On-Call crewed fire appliance are either based in the city or within close proximity to it (Southern, Wigston, Birstall).

It can be concluded that there is no correlation between the increased population and the potential increased risk to public safety. For this reason, a comprehensive risk model has been devised that takes account of a much wider range of considerations. In addition, a detailed response modelling exercise has been completed to identify what level of resource could reasonably be expected to attend all parts of the city within a ten minute response window. This model has identified that the removal of a wholtime crewed fire appliance in the city area will have no impact on the Service's ability to meet current attendance time standards. Furthermore, the model also identifies that the impact upon the weight of attack would negligible.

The FBU states that the proposal to remove a wholetime crewed fire appliance from the city area without identifying which of the three city stations it will be from, highlights a lack of intelligent consideration. It has been clearly identified that there is an over provision in the city and further analysis will provide a greater accuracy for planning purposes.

The FBU is also concerned that there has been a lack of horizon scanning by management over the future development and visions for Leicester City. Assurance and evidence can be provided that urban and commercial development plans have been considered for the city and entire Authority area in preparing our draft proposals.

A further point raised by the FBU is that the recently implemented 'switch crewing' arrangement for the Aerial Ladder Platform (ALP) could result in the actual reduction of two city appliances at certain times. Assurance can be provided that appropriate cover movements will always be implemented in order to maintain sufficient fire and rescue resources in the city area.

Finally, in relation to the city, the FBU contend that the provisions at Birstall, Wigston and Southern Fire and Rescue Stations are not a reliable form of back up in the event that they are required to be mobilised into the city. There has not been any evidence that supports the FBU statement and it can be confirmed that all fire and rescue resources form part of an overall response plan that is reliable and appropriate to risk.

6. The Proposal to Remove One Wholetime Crewed Fire Appliance From Loughborough Fire and Rescue Station

The FBU response associated with the proposal to remove one wholetime crewed fire appliance from Loughborough Fire and Rescue Station is similar to the theme it raises in relation to the proposal to remove a wholetime crewed fire appliance from the city area in that it will present increased risk to firefighter and public safety.

The FBU is very concerned with the proposal to remove the second wholetime crewed fire appliance from Loughborough Fire and Rescue Station because it cannot be achieved safely and will put the public and firefighter's lives at risk. The main point that the FBU raises is that the delay in the arrival of a second pump will seriously impact on the completion of safety critical tasks that will not be able to be carried out. In response to this point, the proposals, as set out in the IRMP Consultation Document 2015-20, are based upon the application of a very detailed risk assessment that has been independently validated as fit for purpose, appropriate and valid. The criteria that form the risk assessment include socio-demographic factors, Indices of Multiple Deprivation and incident demand. The number of operational incidents occurring in the Loughborough area during the last five years has reduced dramatically (29%). The vast majority of all operational incidents (64%) have only required the attendance of one fire appliance. If this proposal to remove one wholetime crewed fire appliance from Loughborough Fire and Rescue Station is agreed, on the 36% of occasions where a second fire appliance is likely to be required. This will be dispatched from one of three stations that are in close proximity to Loughborough i.e. Shepshed, Birstall or Castle Donnington.

The calculations associated with any delay in the arrival of a second appliance have indicated that there will be, on average, a delay of approximately three minutes for the attendance of the second fire appliance.

The statement made by the FBU about not being able to carry out safety critical tasks is not the case. Evidence proves that operational guidance and training is provided to ensure that a full response capability can be initiated at every emergency incident irrespective of the number of resources that form the first attendance.

It can also be confirmed that a time lag between the arrival of the first and second appliances is not unusual. It already occurs on a very frequent basis throughout the Authority area and the UK as a whole, and is determined by the fact that not every fire station consists of two wholetime crewed fire appliances.

The FBU has identified that the number of rescues undertaken in both the Charnwood Borough and Loughborough Fire and Rescue Station areas has increased during the last two years. This trend is acknowledged. However, analysis of the data would also point out that the single biggest factor is associated with incidents involving water.

The current LFRS specialist water rescue capability is limited to the provision of a single team that is based at Southern Fire and Rescue Station. Through consultation with the FBU it has been agreed to increase the general level of water rescue capability throughout the Service as a consequence of the increasing national trend in water related incidents. This addresses the issues raised.

The FBU state that in preparing the proposals, no risk assessments of task and time have been carried out by management. Confirmation can be given that in developing the draft IRMP proposals, due cognisance and regard has been afforded to task analysis. In respect of this, LFRS utilised the risk assessments that have been provided by the South East Operational Policy and Procedure Group (SEOPAP) that are linked to the national incident types.

In undertaking the relevant risk assessments, the FBU contend that management should have utilised the Brigade Response Options Study (BROS) guidance. Firstly, the BROS planning tool does not pay sufficient regard to the use of improved technology that is employed in the deployment of operational appliances and equipment throughout Leicestershire. Secondly, BROS is not a product that is widely (if at all) used in any fire and rescue service, and whilst management acknowledge the FBU comments, it is difficult to accept them fully as evidence points to the use of SEOPAP guidance as being more reliable.

Finally in respect of Loughborough, the FBU state that the switch crewing arrangement that applies to special appliances will potentially leave the Loughborough area without fire and rescue cover every time a special appliance is mobilised. Assurance can be provided that appropriate cover movements will always be implemented in order to maintain sufficient fire and rescue resources are available in the Loughborough area.

7. The Proposal to Remove One Wholetime Crewed Fire Appliance From Oakham Fire and Rescue Station

The FBU response associated with the proposal to remove one wholetime crewed fire appliance from Oakham Fire and Rescue Station is similar to the theme it raises in relation to the proposals to remove one wholetime crewed fire appliance from the city and Loughborough areas i.e. it will present increased risk to firefighter and public safety.

The FBU state that management has failed to consider the issues associated with cross border interoperability and mutual assistance. The FBU also states that management has failed to

take account of the matters relating to other fire and rescue services' IRMP proposals. LFRS is fully aware of the operational change proposals that are being managed in Lincolnshire (Stamford Fire and Rescue Station) and in Northamptonshire (Corby Fire and Rescue Station).

Whilst it is acknowledged that more emphasis will be placed on co-responding from Stamford, it should be noted that Lincolnshire have already identified that this arrangement will only impact on one of the two appliances based there. Northamptonshire are proposing to remove the second appliance from Corby. However, it should be acknowledged that this will be replaced with a specialist response vehicle containing an enhanced firefighting capability (the use of new technology incorporating cold cutting equipment). Assurance can be given that these changes will have a negligible impact on our partner fire and rescue services future ability to assist LFRS in the event that mutual assistance arrangements are invoked.

The FBU claim that the attendance time of approximately fourteen minutes in the consultation document to support a two appliance attendance in the Oakham area using an alternative provision from Uppingham, Melton or Billesdon (or Corby or Stamford) is inaccurate. This assertion is supported by the table that the FBU provide in their response document. Further analysis has been unable to validate the data or assertions made by the FBU.

The approximate attendance time of 14 minutes, should a second appliance be required to attend from a different station, was established through the application of comprehensive modelling of the response options. The speeds that were used in the analysis are derived from actual Automatic Vehicle Location System (AVLS) data using blue light real travel time to incidents averaged over three years. The speeds are weighted for urban and rural roads and factored into the calculations.

The outcomes of the analysis have been integrated into the CadCorp Corporate GIS system to produce isochrone travel time extent maps. An isochrone is a line on a map that shows the extent of travel within the time parameters used for each scenario. The process uses the Ordnance Survey Integrated Transport Network (ITN) which is a digitised dataset of road junction points on a map and calculates travel time for appliances to these road junction points.

A number of variables can apply that mean actual road speed trials under real time blue light conditions could differ from those predicted in the model. However, because default speeds have been taken from actual blue light journeys by road type and environment and then averaged, it is unlikely that they would differ significantly. As a consequence of the consultation response submitted by the FBU, the Service has revisited the analysis of the predicted response times and this has identified that, unless a specific address is identified, it cannot be predicted with absolute accuracy. Confidence can therefore be given that the best available analysis has been utilised.

The FBU state that in preparing the proposals, no risk assessments of task and time have been carried out by management. In developing the draft IRMP proposals, due cognisance and regard has been afforded to task analysis. In respect of this, LFRS has utilised the risk assessments that have been provided by the South East Operational Policy and Procedure Group (SEOPAP) that are linked to the national incident types.

The FBU has identified that the number of rescues undertaken in both the Rutland and Oakham Fire and Rescue Station areas has increased during the last two years. Whilst

this point is acknowledged, further analysis identifies that it has been caused mainly by a two year spike in the number of road traffic collision incidents. In respect of this, it should be noted that Oakham attends the second lowest number of road traffic collisions when compared to all other wholetime fire and rescue stations in LFRS. Further to this, Rutland suffers the second lowest number of road traffic collisions when compared to all other district and unitary areas in the Authority area.

Further analysis of road traffic collision data attended by LFRS identifies that only a third of all road traffic collisions that occur in the Rutland and Oakham Fire and Rescue Station areas require an intervention resulting in the extrication of a casualty. The remaining two thirds require no action at all or very limited actions to make the vehicle safe. It can be concluded that when the outcomes of the detailed risk assessment and low levels of demand are fully appreciated, the operational proposals in the consultation document provide a better balance of overall resource provision.

Application of the management risk model has identified that Rutland represents the lowest overall risk of all our community areas. It is the least deprived, has a significant lower number of emergency incidents that affect fewer people. By comparison, Rutland is the safest place to live and work in Leicester, Leicestershire and Rutland and the proposal to remove the second appliance from Oakham is supported by the outcomes of the detailed risk assessment. When examined in detail, the demand profile for Oakham Fire and Rescue Station identifies that it attended 246 operational incidents in 2013/14, 54% (132) of which were false alarms. Based upon data analysed for the period 2009/10-2013/14, it can be forecasted that there will be approximately nine occasions each year whereby the On-Call appliance will be required to attend a simultaneous incident because the wholetime crewed appliance is already committed to another incident.

Finally, the FBU states that there are no proposals presented for the Heavy Rescue Unit (HRU) based at Oakham Fire and Rescue Station. The FBU also raise questions about whether the vehicle will be removed. Whilst these are not IRMP consultation issues, it can be confirmed that there are currently no plans to remove the HRU from Oakham. If the proposal to remove the second appliance is agreed, a revised crewing arrangement for the HRU will be established.

8. The Proposal to Reduce Standard Wholetime Crewing on Fire Appliances from Five to Four

The general theme of the FBU response associated with the proposal to reduce standard wholetime crewing on fire appliances from five to four is that it will present increased risk to firefighter and public safety.

In their response, the FBU state that proposals to reduce standard crewing from five to four do not adequately consider the impact upon the safety of the public and the safety of firefighters. The FBU add that this crewing reduction will put firefighters and the communities of the Authority area at unnecessary risk. The assertions made by the FBU in respect of safety are not supported by any valid evidence or data and the FBU has failed to indicate and/or validate how reducing standard crewing from five to four will reduce the implementation of initial lifesaving actions.

Evidence provided in the consultation document identifies that on 46% of all mobilisation occasions, the first responding fire appliance will consist of four crew members. In addition to this, during the five year period that these figures were assessed over, no

significant information that would suggest that this practice is a danger to either the public or to firefighters has been provided to LFRS. In relation to this issue, there have been no reported health and safety events, of the five debrief submissions in the last four years, none have required any further action to be taken, and additionally there have not been any points recorded within the operational performance monitoring process.

National operational guidance that has been published in order to support the implementation of arrangements to resolve emergency incidents and scenarios does not stipulate a minimum resource requirement (except for specialist water, rope and urban search and rescue scenarios). As such, it is entirely the responsibility of the Service to ensure that its operational doctrine is safe and fit for purpose. Assurance can be given that all extant and future operational policy will continue to be safe and fit for purpose. The SEOPAP task analysis guidance that has been utilised for task analysis modelling establishes that a minimum crew of four crew members on a fire appliance is an appropriate and safe level of provision.

In addition to this it should also be noted that extant Service Policy agreed at Staff Consultation Forum has been in place since 2010, and this states that the minimum level of safe crewing on a fire appliance is four.

In respect of the comments the FBU raise relating to compliance with health and safety requirements, The Service can provide assurance that it is fully aware of its responsibilities in accordance with both statutory and non-statutory requirements. Furthermore, the Service maintains an excellent record of demonstrating effective management of the health, safety and welfare of staff, and, would not intentionally introduce any measures that would conflict with this principle.

In their response, the FBU also states that management has used misleading data to support the proposal to crew fire appliances with four personnel. The figures presented in the consultation proposals account for all fire appliance mobilisations across the entire Authority area. Moreover, the approach taken by the FBU in their submission is misleading because they have chosen to remove all data associated with the six Leicester City fire appliances. By excluding these appliances the actual outcomes present an incomplete and misleading picture.

9. Firefighter and Public Safety

The general theme of the entire FBU response is that implementation of any of the proposals will place lives at risk and reduce firefighter and public safety.

The FBU states concern that the Service is continuing to fail to meet its own ten minute response time for ALL life risk incidents. The CFA has agreed and established a 10 minute response requirement for all life threatening incidents. Further to this, the performance expected is that it will be achieved on 95% of occasions. The measure is based upon the attendance of the first appliance being achieved within ten minutes of mobilisation to a life threatening incident. The aim is not merely to meet this standard, but where possible exceed it.

The current IRMP proposals only involve the removal of the second pumps at Oakham, Loughborough and one from a city station. Therefore the achievement of the attendance standard will not be affected.

The FBU, in their consultation response refer to a performance graph to highlight an assertion that performance against the life risk attendance standard has dropped by 4% since 2010/11. The information presented by the FBU upon review must be challenged because (a) the information relating to the percentage figures used are incorrect, and (b) the FBU has failed to recognise the successes that have been achieved or indeed the negative impact that periods of strike action have had on overall levels of performance.

For purposes of clarification, the FBU have interpreted the data incorrectly for the year 2013-14. The actual published level of performance should read 95.72%. The FBU response contains a mistake as the 2014-15 year to date figure has been entered as the 2013-14 outcome. Consequently, performance between 2010-11 and 2013-14 has reduced by 1.97% (taking account of periods of strike action), not the 4% that is claimed by the FBU. Furthermore, this performance drop would be mainly as a result of changes in response practices associated with crews being required to dress in personal protective equipment prior to commencing the emergency response. This procedure is a documented Service health and safety requirement.

When the data is analysed in more detail, it also reveals that the number rather than percentage of incidents involving life risk has also reduced from 1058 in 2010-11 to 738 in 2013-14. This is a 30% reduction demonstrating that all of the communities in the CFA Area are safer now than they have ever been.

10. Summary

The Service welcomes the FBU response to the draft IRMP proposals. In preparing this response, attention has been given in order to address all of the issues and points that have been raised.

Satisfaction can be given that all elements of the process to date have been completed in a legally compliant, open, transparent, thoughtful and diligent way.