



**LEICESTERSHIRE**

**Leicestershire Fire Brigades Union**

**Response to Leicestershire Fire & Rescue's Integrated Risk Management Plan**

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## **Executive summary**

Leicestershire Fire Brigades Union welcome the opportunity to provide some clarity behind the Leicestershire Fire and Rescue Service (LFRS) Integrated Risk Management Plan (IRMP) proposals 2020-2024.

Our response focuses on the vague nature of this IRMP, produced by LFRS that shows contempt for the communities of Leicester, Leicestershire and Rutland. An IRMP by its very nature should identify the risks posed to communities and the Fire and Rescue Services proposed plans to negate such risk. The IRMP should also be the main document that the Fire and Rescue Service be held accountable.

This IRMP is nothing but vague in every area. There is no clear identifiable plan contained within – seven proposals lacking; detail and rational. Leicestershire FBU does not accept that this IRMP complies with the National Framework Guidance 2018 as set out by the Home Office in relation to the Fire and Rescue Services act 2004.

During the 4 year period this IRMP is proposed for, it is this very document that LFRS are held to account. Any changes to which the way the Fire and Rescue service delivers its response has to be done in relation to this plan, this is short of another plan, often know as an “intermediate IRMP”, being produced.

## **The Fire Brigades Union**

Founded on 1 October 1918, the FBU is one of the UK's oldest specialist trade unions, with a proud history. Over 100 years, our members have helped shape the modern Fire and Rescue Service.

For over a hundred years, the FBU has been the voice of firefighters across the UK. Since 1918 the union has supported firefighters, influenced fire safety policy and won improved pay, terms and conditions for its members.

Formed shortly after the great fire of London as a trade union for firefighters in London, the FBU has become a UK-wide union, which at its centenary, represented around 34,000 men and women in the fire and rescue service, including control staff and retained firefighters.

As the professional voice of firefighters, the FBU continues to play a vital role in shaping the fire and rescue service that exists today.

FBU members are highly-skilled professionals who work in a diverse range of roles across fire and rescue services.

Every member plays an important part in protecting public safety, and some demonstrate great bravery and self-sacrifice to protect local communities from danger.

As well as the vital work of fighting fires, the modern firefighter keeps the public safe from many other threats, including floods and road traffic incidents, and plays a major role during major incidents such as terrorist attacks. Crucially, fire and rescue service workers help prevent fire and loss of life with comprehensive public information and engagement campaigns.

The general public turns to firefighters when their safety is threatened, particularly when they do not know where else to turn, knowing that we can be relied on to get the job done. Firefighters keep the public safe to enjoy their lives knowing that an unseen hand helps protect them from fire and other dangers.

### **Firefighters have three key aims:**

- To save lives and prevent injury
- Protect property, both public and private
- Render humanitarian services

## **Integrated Risk Management Plans**

All Fire and Rescue Services in England are required to develop an Integrated Risk Management Plan (IRMP), which identifies and assesses all foreseeable fire and rescue related risks and sets out how we plan to mitigate these risks. Integrated risk management plans are required to cover a minimum of a three-year period.

Although the Fire Brigades Union supports the principle of IRMP, so far they have not delivered measurable improvements in service delivery. IRMP's have frequently set out ambiguous promises of service improvement that are not quantified and often not delivered.

The IRMP in which we are responding to in this case, is not a plan which is integrated. Like most, it is a plan that is more about budgets than it is risk. This plan is unclear on the services intentions and like previous Leicestershire FRS IRMP's, is likely to be used as a vehicle for more cuts in operational response, fire prevention and protection.

### English Fire Service Circular 25/2007

"Integrated Risk Management Planning (IRMP) is an holistic, modern and flexible process, supported by legislation and guidance, to identify, measure and mitigate the social and economic impact that fire and other emergencies can be expected to have on individuals, communities, commerce, industry, the environment and heritage. FRA's when establishing local options for risk reduction and management within annual Action Plans, must take account of the duties and responsibilities outlined in the National Framework, the section 9 Emergency Services Order, the Civil Contingencies Act, and the Regulatory Reform (Fire Safety) Order.

This places emphasis on flexibility and partnership, working on local, cross border and regional planning for prevention and intervention activities to save and protect life and to reduce the economic and environmental impact of fire to the community. Through this partnership approach IRMP should deliver a proportionate response, that is evidenced based, which will ensure efficiency".

## The last 9 years

Home office statistics identify that previous decisions, set out in Leicestershire FRS IRMP's have delivered only detrimental impact to the safety of both the firefighters attending emergencies and the public.

Leicestershire have in their IRMP sought to conceal the impact of previous poor decision making.

The following Figures (1 - 2) visually identify the reduction in firefighter numbers across Leicestershire.

Figure 1: Firefighter numbers since 2010.

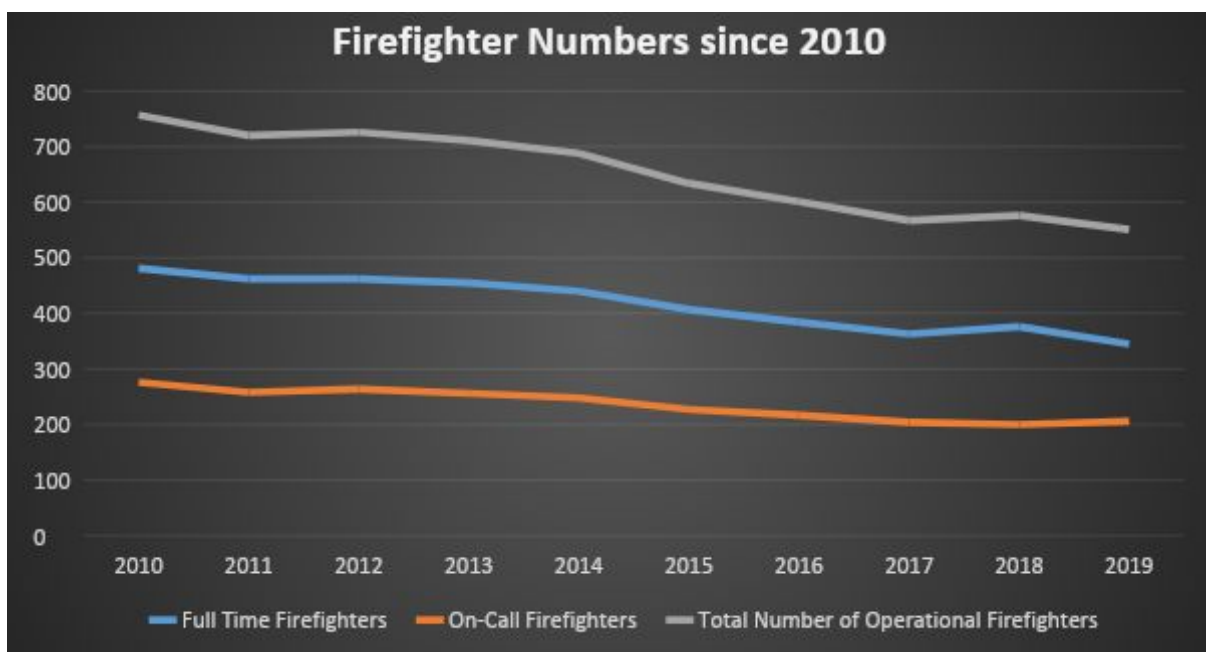
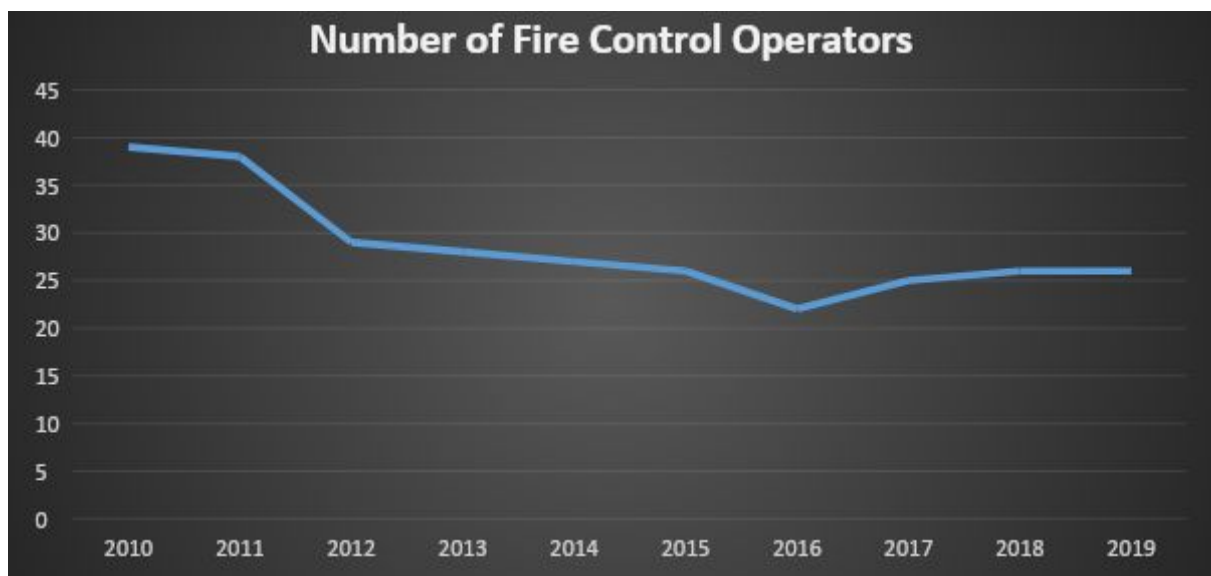


Figure 2: Number of Fire Control Operators.



Although the numbers of frontline Firefighters, Control room operators and Support staff have been cut right across the UK FRS, what we do know that the cuts in numbers illustrated in figures 1 and 2 are far higher than the average.

Place	Full Time	On-Ca ll	Control	All Firefight ers	%
England	-7,131	-2,21 4	-468	-9,813	-21%
Northern Ireland	-77	-46	-3	-126	-6%
Scotland	-807	-262	-45	-1,114	-14%
Wales	-217	-176	-19	-412	-11%
<b>UK</b>	<b>-8,232</b>	<b>-2,69 8</b>	<b>-535</b>	<b>-11,465</b>	<b>-19%</b>
LEICESTERSHIRE	-136	-70	-13	-219	-28%

### The Impact of the Cuts

These devastating cuts have led to significant increases in the time a fire appliance attends an emergency.

Primary Fires: It now takes an appliance three and a half minutes longer to attend a primary fire than that which it did in 1999, and one and a half minutes longer than which it did in 2010. (Figure 3)

Dwelling Fires: It now takes an appliance three minutes longer to attend a dwelling fire than that which it did in 1999 and one and a half minutes longer than which it did in 2010. (Figure 4)

Figure 3: Response Time to Primary Fires

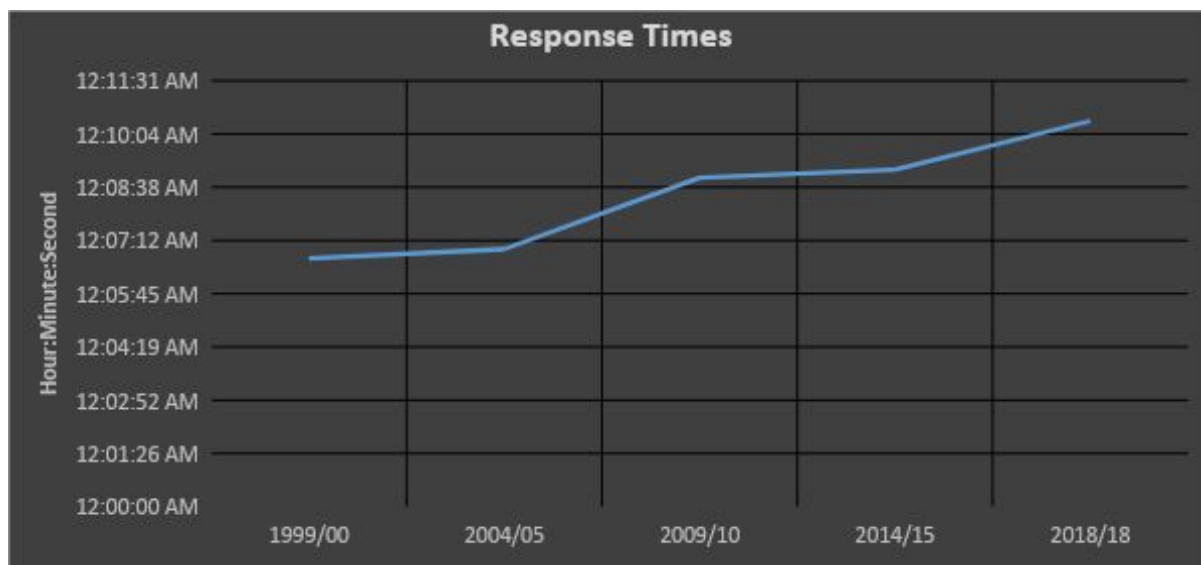
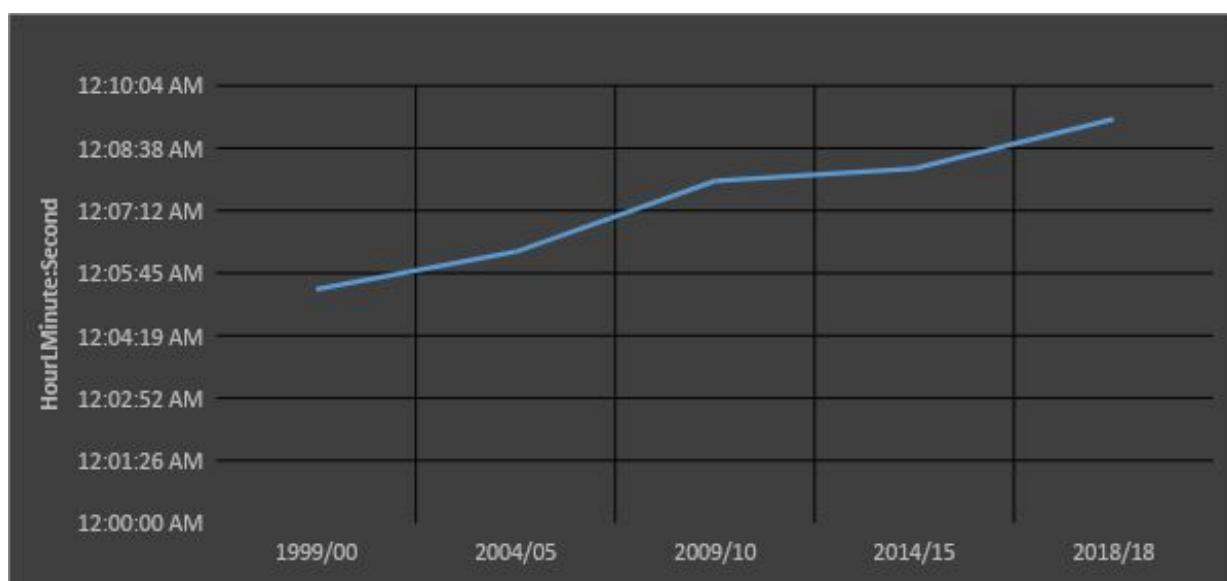


Figure 4: Response Time to Dwelling Fires



Firefighters respond to a wide range of emergencies: road traffic collisions, chemical incidents, multi-agency response to terror, suicides, animal assistance and flooding.

Fires were reduced for decades by better regulation, changes in smoking habits and firefighters' prevention work (such as installing smoke alarms).

The number of fires has not fallen in recent years. In some years it has risen. Fewer fires never justifies fewer firefighters.

The number of people who die or are injured at fires has fallen for decades. However the Grenfell Tower fire and other incidents before and since show that the risks of fire remains and emergency intervention is absolutely necessary.

Firefighters also assist people at non-fire incidents. In recent years, firefighters have dealt with almost 5,000 fatalities and more than 50,000 other casualties at non-fire incidents. When people need help, they need professional firefighters.

Annually, 40,000 people are rescued by firefighters across the UK. That's 100 every day.

Fewer firefighters and appliances has a huge impact on the service to the public. It means that there are fewer firefighters to crew appliances. This means fewer firefighters on the fire ground at the beginning of an incident, the best time to get the situation under control. Similarly, the day crewing plus system, brought in to save money, also leave whole communities more vulnerable at night – when fatalities and injuries are often higher because people are asleep in their beds.

Cuts put public safety and firefighter safety under threat.

Jump crewing/double jumping – where firefighters ride are required to leave their appliance to crew another vehicle (such as an aerial ladder) – will have similar effects on the speed and weight of response to incidents. Response times are also affected by the shortages of On-Call (retained) firefighters, who have to report to their station before crewing an appliance. Our retained members have explained their exasperation when they individually arrive on stations, ready to attend an incident, only to be told there are too few other crew members available to ride an appliance. Firefighting is a collective endeavour, carried out by firefighters together with their watches. Cuts weaken that collective response.



## **FBU Response to the IRMP 2020/24 proposals**

The Fire Brigades Union will respond to the proposals contained within the IRMP Consultation document but does so with a view that LFRS have failed to identify what their proposals are in order to promote what change they deem necessary and/or what options are available .

### **IRMP Proposal 1**

At first sight the change of attendance times to an average based statistic may seem insignificant. Unfortunately this will allow the poor attendance times where resources have been stretched to be masked by the faster response times gained in the more urban areas of our brigade. All our community deserve to have a service within the national agreed time limits, this form of offsetting should be rejected.

The freedom to move appliances already exists so what is meant by flexibility? Without the details of where, when and how, an informed response is not possible.

At what expense are these flexibilities achieved? Is resilience in existing locations to be sacrificed thus leaving the safety of the public and fire crews threatened? Where does the flexibility start and more concerningly where it would end?

The fire service is inherently adaptable but in terms of an IRMP what is required for public scrutiny are detailed proposals on identified risks. This proposal is pitifully short of these and therefore should be rejected

### **IRMP Proposal 2**

This is a misleading proposal as it is based upon the premise that crews are fixed to their home stations.

Whilst Whole-time firefighters are located at strategic, risk determined sites around the county they can be relocated in such a way that is not restricted to this area alone thus covering deficiencies at other stations.

For improvements in On-call firefighters availability investment in training and recruitment and remuneration are the solutions to this frontline issue.

Slower mobilisation of on call firefighters may allow for greater availability it is true and should be a specific response to specific tasks i.e. reliefs. However this should not be the precursor to slipping of mobilisation times for all on call staff.

Ultimately we are presented with a generic statement that offers no details as to how this wish will be achieved and therefore no informed response is possible other than to reject for fear of signing a blank cheque.

### **IRMP Proposal 3**

This project has been at a development stage for approximately 6 years now with Project `lite`. It had agreed to everything, specifications and budget was accepted only to have the process restarted and now presented to us once more. The frustration of this drawn out timescale must not be confused as we fully support the replacement of the old aerial ladder platform for a newer specialist appliance. The experience of Grenfell has taught us that it is a fundamental necessity to have this capability within service and that the public deserve a modern fit for purpose model and it is our belief that with such an investment consideration should be made to crew this permanently not on a cross crewed basis.

### **IRMP Proposal 4**

Leicestershire Fire and Rescue has a statutory obligation to promote fire safety in our community, it is therefore a little confusing that this IRMP should ask for permission to continue a role it is duty bound to undertake. That being said

We understand that the education of our community is the cornerstone of our preventative approach to risk. The FBU are therefore in agreement with the sentiment of this proposal. It should not however threaten the operational resilience of our service elsewhere, we must not rob Peter to pay Paul. It should also be in line with nationally agreed role maps such that tasks asked of crews should not exceed those they are suitably trained for.

### **IRMP Proposal 5**

Collaboration between agencies has been the watchword of recent fire service administrations. In principle this can appear to have many benefits. Unfortunately with the

cost cutting attitudes of LFRS management it is feared that this will merely be an opportunity to either remove departments within our structure or adopt roles that should not be absorbed into the fire service with a view to additional income streams. We are specialists at our job and although we are by nature a workforce that can adapt and improvise when necessary we must aim to be the elite in our field and develop only in areas that are relevant to our role not paper over the cracks of other failing services.

The proposal states that we should “continue to collaborate”, this would not be brought to an IRMP if the desire is to maintain the status quo, therefore it is safe to say that an expansion of this collaborative principle is to be expected. But in what way? Without these details it is impossible to give an informed judgement or answer, we are therefore forced to reject this proposal.

### **IRMP Proposal 6**

This is a strangely emotive phrase and could be seen as slightly disrespectful of the Staff of LFRS as it implies that at present we are not ‘Doing the right thing’.

Our staff work diligently within the limits of their agreed roles, the guidance on these roles ensure we are trained properly, resourced correctly, act safely and are paid appropriately. Open ended statements such as this offer very little to any quantitative consultation and make it impossible to answer. Whilst we agree with the sentiment of the proposal, without any actual detail it is difficult to assess or support.

### **IRMP Proposal 7**

This proposal is very misleading. The very reason that the Duty System may have to be replaced is quite simply down to the legality of the Day Crewing Plus duty system. A similar duty system in South Yorkshire Fire and Rescue Service was found to be non-compliant with the 1998 Working Time Directive and the Health and Safety at Work act 1984, thus ruling the duty system illegal. This ruling has been brought to the attention of Senior Managers within LFRS by Leicestershire FBU officials last summer (2018). The Health and Safety Executive (HSE) also wrote to the Chief Fire Officer (Spring 2019), outlining the potential illegality of the duty system. So working on the premise that duty system is potentially not legally compliant, it is simply not right that LFRS ask the public through consultation that should the Duty System not be legal, do the public agree to change the duty system. It is the statutory duty for the Chief Fire Officer and the Fire authority to comply with the law.

Should the Chief Fire Officer comply with the law, it is also the statutory duty of the Chief Fire Officer to comply with decisions taken previously based on the statistics available that at the strategic locations identified should have adequate fire cover.

Local officials have been very pragmatic in wanting to assist LFRS management with this matter and have offered to work with LFRS managers to find a solution to the legal issues surrounding the Day Crewing Plus duty system, unfortunately the Chief Fire Officer has not accepted the offer of working together to find a solution, we find this frustrating as this leaves a lot of needless uncertainty for our members and the public, with also the potential for a costly legal challenge with the taxpayer footing the bill.

### **Closing remarks**

The FBU fails to see how the IRMP consultation adheres to Consultation Law as it is our belief that it fails to meet 'Gunning Principles'.

LFRS have failed to initiate any consultation activity other than to share this document.

We are unable to ascertain if an Equality Impact Assessment has been completed. We note that this document hasn't been made available in different languages to better support those from minorities across the diverse county of Leicestershire.

This document has a number of errors like cartoon appliances giving the impression that TRV's are full sized fire engines and the glossary unbelievably describing the day crewing shift pattern incorrectly as one with a " Fire engine crewed by Whole-time employees who work a self-rostered 24-hour shift system and are immediately available to respond to emergency incidents".

This consultation is built on a common thread of increased flexibility, but there is a distinct lack of explanation of what this means to crews and staff. The benefits to our community are also described in general, non-specific terms such as efficiency and effectiveness both targets that any managerial team would be expected to achieve as a bare minimum and not something the public should be consulted on in this way.

In layman's terms there is no meat on these consultative bones. It is either something that asks few real definitive questions or more concerningly asks for Carte blanche to do whatever it wishes for the next 5 years based on a vague generic document which allows no realistic scrutiny