

North Wales Regional Committee

NWRC(2) 03-06 (p2a)

Date: 19 May 2006

Time: 10.00 - 12.30

Venue: Craig Y Don Community Centre, Llandudno.

Title: FBU North Wales: Observations and Proposals for the North Wales.

Fire & Rescue Authority IRMP Year 3 Action Plan



FBU North Wales Observations and Proposals for the North Wales Fire & Rescue Authority IRMP Year 3 Action Plan

Contents	Page
Introduction	1
Effective Emergency Response	2
Observations On Year 3 Action Plan	3
Point 1	
Dual Purpose Fire Appliances	3
Emergency Tenders (ETs)	3
Aerial Ladder Platforms (ALPs)	4
Point 2	6
Point 3	7
Point 4	7
Point 5	7
Point 6	7

Point 7	7
Risk 1 - Community Fire Safety Programmes	7
Risk 2 - Community Initiatives	7
Risk 3 - Repeated False Alarms Generated by Automatic Fire Alarms	7
Risk 4 - Standards of Fire Cover	8
Risk 5 - Changing of Shift Patterns	8
Risk 6 - Balance of the Brigade	8
Risk 7 - Arson	8
Risk 8 - Brigade Structure	8
Risk 9 - Challenges for the Future	8
Conclusion	9
Appendix 1 – Emergency Tender Inventory	10

Introduction

The FBU in North Wales remains clear that North Wales Fire & Rescue Authority's first and main priority is to crew all fire appliances 24-hours a day, 7-days a week.

This will be the first criteria against which the Fire Brigades Union and the public of North Wales will judge the success of the Authority's service provision.

The Fire Brigades Union in North Wales fully supports the principle of risk-based fire & rescue service activity planning, in conjunction with the process of risk-based emergency cover provision. This position was formalised in the national policy position adopted at the FBU Annual Conference in May 2004.

North Wales Fire & Rescue Authority's (NWF&RA) 3rd Year Action Plan is derived from its 2004/05 IRMP. The observations submitted by the FBU in North Wales on the original IRMP in January 2004 remain relevant and should be read in conjunction with this paper.

Unfortunately the observations the FBU were able to make on the North Wales Fire and Rescue Service Year 1 IRMP were limited as a result of the absence of critical data-sets which should have been used to construct this first year IRMP. The Year 3 Action Plan again does not include the data-sets we would have expected to see.

Staff working in the front line of service delivery are clear as to the type of support they need from the Authority to improve their effectiveness in saving lives and property across the whole of the North Wales Brigade area.

From the professional perspective of these front-line staff, the key to effective Integrated Risk

Management Planning lies in the complete integration of preventative activity and robust emergency response capability at station level.

Effective Emergency Response

The Year 1 IRMP produced by North Wales argued that the former 1985 National Standards of Fire Cover were inappropriate for the fire & rescue service of the 21st Century. This argument was grounded in the fact that these former emergency response standards were developed to protect property, and did not support the primary focus of the service – the saving of lives. Based on these statements in the Year 1 IRMP, the FBU expected the North Wales IRMP 3rd Year Action Plan to include proposals that improved all areas of service activity, including our ability to save lives with an emergency response.

ODPM guidance to the Brigade in the spring of 2004 (prior to devolution of fire & rescue service responsibility to the Welsh Assembly Government) clearly stated that a fundamental part of planning fire service emergency cover under the IRMP process is the determination of what emergency response is required to different types of emergency incidents.

The ODPM informed the Authority that it should first identify the various types of emergency incident that it could routinely expect to attend, (termed ‘Planning Scenarios’) and then plan the necessary emergency response for these Planning Scenarios, including any phasing of that response.

The Authority was advised that it would have to provide evidence that the planned responses are both safe and appropriate, and such evidence would be generated as a result of carrying out detailed risk and task analysis of the Planning Scenarios.

The ODPM also confirmed that responsibility for the safety and effectiveness of the planned responses lies with the North Wales Fire & Rescue Authority, and as such they should be approved at the highest level.

The FBU is extremely concerned that the Authority has still not discharged the requirement placed on it to undertake risk-based response planning as part of the IRMP process.

Whilst increased liability risks are a decision for the Authority, the health & safety risk posed to front-line employees is the business of the FBU. The Authority’s position remains inconsistent; it cannot on one hand berate the previous National Standards of Fire Cover whilst on the other hand continuing to fail to implement meaningful risk-based response planning.

Although decisions on emergency attendance times to incidents are currently a decision for North Wales Fire & Rescue Authority under the IRMP process, the Welsh Assembly is currently consulting on Service Standards for Attendance to Fires in the Home. The FBU has submitted a full written response to this consultation and recognises that Assembly Service Standards, when formally adopted, will be a key element in fire & rescue authority risk reduction planning in Wales.

Observations on Year Three Action Plan

Year 3 Action Plan - Point 1

Dual-Purpose Fire Appliances

We agree in principle with the proposal to introduce dual-purpose fire appliances in order to utilise them as a second appliance in strategic locations, however the information included in NWF&RA's Year 3 Action Plan is extremely limited in this respect. There is no information included on how risk-based decisions will be reached on the number and proposed locations of these fire & rescue appliances.

Using existing activity level statistics to decide both number and location of dual-purpose fire appliances would be misleading and dangerous. For instance stations such as Barmouth, where these appliances are presently located, have never been crewed sufficiently to allow them to be used as a second appliance on a regular basis. Also no information is given on whether a dual-purpose fire appliance exists which is capable of undertaking all the new functions the Fire & Rescue Authority envisages, whilst still retaining the off-road capability of existing dual-purpose fire appliances.

The Year 3 Action Plan does not explain how the necessary capital and revenue funding for additional personnel and appliances will be met, or how they will recruit the extra personnel working the Retained Duty System to crew these appliances on a 24/7 basis. This consideration is particularly relevant as NWF&RA cannot at present adequately crew all front-line fire appliances and the four dual-purpose fire appliances which it presently relies upon on a 24/7 basis.

Emergency Tenders

The FBU in North Wales supports the proposal to upgrade all hydraulic rescue equipment on all front-line fire & rescue appliances in an attempt to match their hydraulic rescue capabilities with those of existing Emergency Tenders (ETs).

The Authority however must be aware that the hydraulic rescue equipment in question i.e. dedicated cutters, spreaders and rams, is not the only specialist rescue equipment currently carried on Emergency Tenders. Other specialist rescue equipment carried on ETs includes items such as heavy lifting gear and high capacity airbags, industrial lighting units, and other specialist items of equipment.

For comparison purposes the FBU has included a full inventory of the equipment currently carried on Emergency Tenders in North Wales as an appendix to this submission. We would have expected the Authority to consider this inventory carefully before making any decision on the future of ET provision in North Wales.

As such the FBU expects the Authority's published reply, which should detail its position on all the

responses submitted to its Year 3 Action Plan consultation exercise, to include confirmation of the date of the meeting where all NWF&RA members were supplied with, and considered in detail, the current ET inventory. Clearly this should have been an integral part of the construction of the Year 3 Action Plan.

NWF&RA has a duty of care to both its employees and residents and visitors to North Wales and the Authority need to ensure that all health and safety regulations are

complied with. At present under the Working from Height Regulations NWF&RA needs to provide a capability for working off a platform at incidents involving heavy goods vehicles and buses. Additional research is required to investigate what other equipment is now required/available to protect North Wales. Existing ETs will still be required to transport this equipment, especially the large items, to emergency incidents.

NWF&RA's present system of collating statistics on usage of ET equipment is flawed. The system only allows the usage of one piece of equipment from an ET to be recorded, even if numerous pieces of specialist rescue equipment are used at an emergency incident. Using present statistics to plan future provision inevitably results in the production of a flawed IRMP/Action Plan.

As such the information and data-sets which have been used to justify a reduction in the number of ETs in North Wales are incomplete. The Authority's Year 3 Action Plan does not include any consideration of the number of hours, due to breakdowns and servicing, that existing ETs have been unavailable for use. Additionally the FBU notes with extreme concern that in spite of the supposed move to risk-based response planning the Authority has chosen not to set a response standard for Emergency Tenders.

The decision to reduce ET provision is therefore both premature and potentially misguided.

Aerial Ladder Platforms (ALPs)

There are currently 4 Aerial Ladder Platforms (ALPs) spread throughout the North Wales Fire & Rescue Authority area. These fire & rescue appliances are based at fire stations in Llandudno, Rhyl, Wrexham and Bangor.

The NWF&RA's 2004/05 IRMP contained a clear undertaking that:

‘our current average response times to emergency incidents will not deteriorate’.

However the Year 3 Action Plan now includes a proposal to increase the response time of an Aerial Ladder Platform from twenty minutes to thirty minutes.

This proposal undermines public trust in both NWF&RA and the IRMP process

The proposal to increase the attendance time for ALPs from twenty to thirty minutes has not resulted from risk assessment and analysis; it stems from a simple desire to save money irrespective of the resulting increase in risk. This money will be saved by relocating the ALP which is currently based at Llandudno to Bangor instead of replacing the Bangor ALP, on the basis that the Bangor ALP is nearing the end of its service life and the Authority has decided not to lease-purchase a replacement vehicle.

The increase in attendance time has been proposed simply to allow the ALP currently based at Rhyl to arrive at Llandudno within the 'new' thirty minute maximum.

The decision to get rid of this fire & rescue appliance stands in stark contrast to the decision taken by NWF&RA only two years ago to proceed with the fire appliance replacement programme which would have seen the ALP at Bangor being replaced, and the ALP at Llandudno remaining.

Even more astonishing is the fact that in the last twelve months alone the ALP in Llandudno has rescued two people from the roof of a hotel in the town which was engulfed in fire. Additionally, and also in the last 12 months, a further 2 people were rescued from a fire in Pensarn by the ALP based at Rhyl Fire Station.

At present NWF&RA are in the process of prosecuting two hotels in Llandudno as a result of them having inadequate fire protection standards. These prosecutions are being made under existing statutory fire protection legislation for which North Wales Fire & Rescue Authority is the enforcing body. The existing legislation requires fire & rescue authorities to undertake proactive fire certification of certain premises – including hotels.

However by the end of 2006 the existing raft of fire protection legislation in the UK will be consolidated into a single piece of fire protection legislation under the Regulatory Reform Order. This new legislation will place the responsibility for conducting a fire risk assessment and implementing the necessary fire protection in buildings (including in hotels) on the owner or occupier.

Once again from a risk-based perspective the Authority's position is totally inconsistent. The FBU is extremely concerned that:

- at a time when we are moving from statutory enforcement to self-assessment of hotel fire protection;
- at a time when even the existing legislative framework which requires proactive certification of hotels by NWF&RA has led to 2 prosecutions for inadequate fire protection arrangements in hotels in Llandudno;
- at a time when rescues from fires in hotels at Llandudno are being made using ALPs;

the North Wales Fire & Rescue Authority has attempted to defend its decision to permanently remove

the ALP from Llandudno on the basis that the risk of a fire in a hotel in Llandudno is low, and that the likelihood of rescues having to be made from a fire in a hotel is low.

As with Emergency Tenders, the Authority's Year 3 Action Plan does not take into consideration the number of hours, due to breakdowns and servicing, that ALPs in North Wales are not available for use. For instance at a recent emergency incident two ALPs broke down. If this had happened after NWF&RA's proposal to reduce the number of ALPs from four to three had been introduced, only one ALP would have been available to protect the whole of North Wales.

Importantly the Authority's Year 3 Action Plan contains absolutely no evidence that alternative or 'creative' solutions have been considered to reduce the capital expenditure burden which the Authority has cited as being the reason for their decision to permanently remove from North Wales the ALP currently based at Llandudno.

If it had adopted a creative problem-solving approach the NWF&RA would undoubtedly have identified a solution which would offset the capital expenditure associated with the retention of the ALP at Llandudno against the capital expenditure budgeted for under the Authority's ongoing fire appliance lease-purchase programme.

A 'creative' solution would be to replace both the existing ALP and one of the existing pumping fire appliances at Llandudno with a multi-role aerial/pumping fire appliance.

The ALP at Llandudno could then be redeployed to Bangor, and the pumping fire appliance at Llandudno could be moved to the next fire station which required its existing pumping fire appliance to be replaced. In this way a large proportion of the capital expenditure associated with lease-purchase of a bespoke replacement ALP for Bangor would be offset against the Authority's existing capital expenditure fire appliance replacement programme.

The FBU will be happy to engage with the NWF&RA to bring our expertise to a creative problem-solving approach which will deliver a replacement ALP capability to Llandudno. We are happy to share our expertise in order that the Authority fully understands, and can take advantage of, the real flexibility and empowerment which they have under risk-based service activity planning.

If this proposal is dismissed, the FBU expects the Authority's published reply, which should detail its position on all the responses submitted to its Year 3 Action Plan consultation exercise, to include as a minimum the dates on which it contacted manufacturers of multi-role aerial/pumping fire appliances, the names of those manufacturers, the specification of the multi-role aerial/pumping fire appliances requested, and the manufacturer's response to the authority's enquiry including costings.

NWF&RA's own statistical evidence demonstrates that the ALPs at Rhyl and Llandudno are used more frequently than those at either Bangor or Wrexham. However the FBU in North Wales agree with NWF&RA that it is not feasible to remove either Bangor's or Wrexham's ALPs as this would leave

large areas of North Wales without an aerial capability.

The only sensible and risk-based option is to retain Aerial Ladder Platform capability at the four fire stations in North Wales which currently operate ALPs.

Year 3 Action Plan – Point 2

Any proposal to charge for false alarms generated by AFAs will increase the risk to both members of the public and to firefighters. As we move from fire safety enforcement by the F&RA to a system of self assessment, fire alarms will potentially either be turned off or ignored to prevent a charge being incurred. This will increase the time it takes to mobilise an effective response to an emergency, which will increase the risk to members of the public and to firefighters who will be attending fires which are more fully developed. It is also likely to increase the costs (rebuild, insurance, business continuity, jobs) which will have to be born by local businesses and local communities.

Accordingly the FBU's observations contained in our original document remain relevant:

- The FBU believes that Unwanted Fire Alarm Signals can be reduced by proactive and positive intervention, coupled with the expansion of North Wales Fire and Rescue Service call management systems.
- The FBU believes that the refusal to respond effectively to alarm actuated calls will result in increased fire fatalities, injuries, property damage/loss and economic damage to the community.
- The FBU strongly condemns the proposal to request members of the public to seek out fires, which will only result in placing individual members of the public at increased risk.

Year 3 Action Plan – Point 3

The FBU in North Wales presented a proposals paper on co-responding to the senior management team of NWF&RS in 2005. We are concerned that this paper was deliberately not forwarded to the Fire and Rescue Authority for their consideration when they were developing their Year 3 Action Plan.

Year 3 Action Plan – Point 4

We support this proposal and look forward to working with NWF&RS on these issues.

Year 3 Action Plan – Point 5

We support this proposal and look forward to working with NWF&RS on these issues.

Year 3 Action Plan – Point 6

We support this proposal; however the data collection system must dovetail with Welsh Assembly Fire & Rescue Service Data Capture and Analysis Systems.

Year 3 Action Plan – Point 7

We support the proposal to review the provision of managers for operational incidents. We note the Authority's statement that this area has not been the subject of any review since 1996.

The FBU is also aware that since the last review clear guidance on operational procedures for incident command has been published. Accordingly the review must be undertaken on the basis that Incident Command Standard Operating Procedures, including span of control maximums, conform to the requirements set out in Fire Service Manual Volume 2: Fire Service Operations – Incident Command.

Risk 1 – Community Fire Safety Programmes

We support this proposal and remind NWF&RA that the 2000 Thematic Review of Community Fire Safety concluded that operational firefighters are best placed to deliver Community Fire Safety due to the high regard they are held in by the public.

Risk 2 - Community Initiatives

Noted.

Risk 3 - Repeated False Alarms Generated by Automatic Fire Alarms

Please refer to our comments made under Action Point 2.

Risk 4 - Standards of Fire Cover

Local knowledge of risks in a fire station's area is a critical element of the risk-based determination of both preventative and emergency response requirements. Any review which leads to changes in activity or deployment of NWF&RA resources must consider both quantitative and qualitative data. The statistical data included in the IRMP/Year 3 Action Plan remains poor and impossible to use for determining the correct standards of emergency cover for North Wales. The FBU is extremely concerned that once again no statistical evidence or data-sets have been provided in an attempt to evidence any proposal included in the IRMP or Year 3 Action Plan.

Risk 5 - Changing of Shift Patterns

Changes to shift times at day crewed stations across North Wales were imposed without any consultation with the FBU and the employees affected.

Once again the data-sets and analysis used to evidence the proposed changes were flawed as they considered an artificial and 'generic' fire station, rather than considering individual fire stations as has occurred in other Fire and Rescue Services. Additionally the data used did not take into consideration measures introduced by NWF&RS to drive down calls such as the new call management system.

Any proposals to change working arrangements/conditions should only be implemented following negotiation and agreement with the Fire Brigades Union in line with nationally agreed procedures.

Risk 6 - Balance of the Brigade

The FBU were not offered the opportunity to become involved in any review, and as a result of the lack of information included in the Year 3 Action Plan it is difficult to comment. However our response to Action Point 1 also covers part of Risk 6.

The Authority's Year 3 Action Plan still fails to address the chronic problems of retained firefighter recruitment and retention in North Wales. We believe that NWF&RA should begin to develop partnerships with the FBU with regard to new initiatives, rather than ignoring our members' expertise in fire & rescue service matters.

Risk 7 - Arson

Any reduction in arson within North Wales is difficult to quantify as only output-based measures (i.e. the measures that the Authority has put in place) have been included within the Year 3 Action Plan. A clearer assessment of effect would have been provided if actual outcomes (i.e. reductions in arson incidence) had been included. The FBU strongly urges the Authority to publish the actual statistical outcomes of its arson reduction initiatives in order that the public of North Wales can have real confidence in any strategy.

Risk 8 - Brigade Structure

Please refer to our comments made under Action Point 7.

Risk 9 - Challenges for the Future

Please refer to our comments made under Action Point 3.

Conclusion

The shift to Integrated Risk Management Planning has offered the North Wales Fire & Rescue Authority a real opportunity to improve the safety of the communities that it serves. However it would appear that yet again the potential of this opportunity has been missed.

The FBU remains extremely concerned that issues of firefighter safety, including tackling North Wales Fire & Rescue Authority's poor retained firefighter recruitment and retention record, have once again been excluded from the IRMP or its Action Plan.

The attempt to use the IRMP to provide cost savings rather than tackling risk is disappointing. North Wales Fire & Rescue Authority should be using the IRMP to reduce risk on behalf of residents and visitors to North Wales.

Emergency Tender Inventory

1 x Clan Lucas Pump	1 x Sledge Hammer
3 x Clan Lucas Rams	1 x Auger Bit
1 x Clan Lucas Cutter	1 x Pick Axe Handle
1 x Clan Lucas Spreader	2 x Crow Bars
1 x Clan Lucas Power Pack	1 x Pinch Bars
1 x Ram Support	15 x Rope Rescue Lines
Various Post Covers	2 x Equipment Bags
2 x Large Axe	3 x Miscellaneous Bags
2 x Shovels	2 x Long Airshore Rams
2 x Spades	2 x Short Airshore Rams
6 x Traffic Cones	2 x Long Racker Rails
1 x Milwaukee Saw	5 x Wooden Planks
2 x Firemans Axes	2 x Bass Brooms
1 x Aircraft Ace	1 x Slurry Probe and Air Hose
1 x Harness Knife	1 x Cow Harness Hook
1 x Large Screw Driver	2 x Low Pressure Air Bags and Hoses
1 x Stilson	1 x Paraguard Stretcher
1 x Hearth Kit (Various Tools)	1 x Bodysplint Stretcher

1 x Hooligan Tool	1 Box Assorted Wedges
1 x Bolt Croppers	1 x Cow Harness
2 x Axle Stands	1 x 15m GP Line
7 x Twin 500w Floodlights	1 x CO2 Extinguisher
6 x 110v Extension Cable	1 x High Pressure Air Bag
1 x Hilti Breaker	1 x Troll Stretcher
1 x Winch Control Lead	2 x Step Chocks
1 x Quadpod	1 Box Various Slings and Strops
2 x Salvage Shelves	3 Boxes Airshore Accessories
Quantity Oil spillage Dollies & Pillows	1 x D.P. Extinguisher
2 x 110v Transformers	P.A. System
1 x Rescue Path	1 x Spot Lamp
1 x Trolley Jack and Handle	4 x White Knight Handlamps
2 x Canopy Winding Handles	4 x Hi-viz Jackets
2 x Wire Strops	4 x Rope Rescue Harness Bags
2 x Snatch Blocks	1 x DVRS
1 x Capstan Winch	1 x First Aid Kit
2 x Winch Leg Chains	1 x Spare O2 Cylinder
2 x Clan Lucas Chains	4 x Hard Hats and Lamps
1 x 10t Master Link	4 x Space Blankets
6 x Selwood Strobes	Various Maps
4 x Inspection Lamps	1 x Harness Knife
1 x Hilti Drill	4 x IS Radios
1 x Personnel Protection Equipment Box	6 x Spare Batteries
3 x Selwood Flashers	1 Box Disposable Gloves
1 x Tirfor Winch	1 x Vodafone
1 x Tirfor Winch Handle	1 x Roll Cordon Tape

6 x "D" Shackles	2 x Step Chocks
1 x Tirfor Winch Cable	1 Box Various Slings and Strops
2 x Wire Strops	3 Boxes Airshore Accessories
2 x Large Ram Supports	1 x D.P. Extinguisher
2 x Partner Saws	P.A. System
Various Discs and Tools	1 x Spot Lamp
1 x Cengar Saw	4 x White Knight Handlamps
1 x Spottle Saw	4 x Hi-viz Jackets
1 x Circular Saw	4 x Rope Rescue Harness Bags
3 x Signs	1 x DVRS
2 x Airbag Controllers	1 x First Aid Kit
1 Box Air Hoses	1 x Spare O2 Cylinder
2 x 110v Generators	4 x Hard Hats and Lamps
8 x Tripods for Lighting	4 x Space Blankets
2 x 1000w Floodlights	Various Maps
4 x 10 Ltr. Petrol	1 x Harness Knife
4 x Soil Suits	4 x IS Radios
4 x B.A. Cylinders	6 x Spare Batteries
1 x Sledge Hammer	1 Box Disposable Gloves
5 x Tirfor Pins	1 x Vodafone
4 x Angle Iron Anchors	1 x Roll Cordon Tape
1 x Ground Anchor	