

The Fire Brigades Union



# Wiltshire Fire Brigades Union

**Response to Wiltshire  
F&RS Plans to Review  
your Fire & Rescue Service**



# Introduction

This document has been researched, developed and written by the local Fire Brigades Union and its Officials within Wiltshire Fire & Rescue Service. They have done this by attending countless meetings at local Fire Stations and seeking the views of the Firefighters that work in the Service. This document therefore represents the real voice of the professionals within the Service, and the views contained within it must not only be listened to in that context, but also acted upon.

The Wiltshire Fire Brigades Union has publicly stated that they consider the proposals currently out for consultation as "unfit for purpose". They have not made this statement lightly. After careful consideration it is the professional view of the FBU and our Members in Wiltshire that, if implemented, these proposals will make wholesale cuts to the front line which will dramatically reduce the operational effectiveness of Wiltshire Fire & Rescue Service. On this basis we consider the proposals to be wholly unacceptable.

The purpose of the Service's proposals is clearly outlined within the documents themselves and elsewhere on the Wiltshire Fire & Rescue Service website, namely: **"the Service needs to save £1.8 million over the next four years."** However the word "need" is in our view misleading. This financial cut is being thrust upon the Service not through necessity but through political choice. Cuts to Fire Service budgets being decided by central Government are being exacerbated locally by decisions made by local politicians to freeze council tax, with resultant cuts to frontline services.

Neither the public nor the Firefighters of Wiltshire will forget promises made time and again by political leaders that frontline public services would be protected from spending cuts. Despite these promises Wiltshire Fire & Rescue Service has now produced plans which would create massive job cuts in frontline Firefighter posts and remove life saving frontline Fire & Rescue Appliances. They have done this, by their own admission, to achieve a £1.8 million spending cut. This has to change. The Fire & Rescue Service should never be compromised in order to make cuts.

It is time to listen to the professionals and not compromise vital life saving emergency services which are so relied upon by the public. The Firefighters and crews of Wiltshire Fire Brigades Union have spoken. Their views are made plain in this document and, if consultation is genuine and meaningful, their professional viewpoint will be treated with the respect it demands. On this basis the Fire Authority must withdraw these damaging proposals and think again.

**Tam McFarlane**  
**Executive Council Member**  
**South West FBU**



**Tam McFarlane**  
*Executive Council Member, South West FBU*

# Wiltshire Brigade Committee

This document has been developed and written by the Fire Brigades Union in Wiltshire and represents our response to Wiltshire Fire and Rescue Services proposals for change that were presented to staff in February 2012, and to the Public in April 2012 for consultation.

The primary concerns of the FBU are;

- The safety of the people of Wiltshire and surrounding areas.
- Ensuring the service delivers a swift and professional response whenever called upon.
- To provide a safe and competent workforce who are well trained and well equipped.

The purpose of the FBU is clear, to represent collectively the best interests of our members and ensure that the public is served and protected by a highly effective Fire & Rescue Service.

Within this document the FBU in Wiltshire sets out our response to each facet of the proposals put forward for consultation by WFRS. We have done this through exhaustive consultation with our members who make up the front line of the Service and deliver it to the public that we serve.

The 'Operational Change Project' has detailed changes to WFRS that the FBU feel could have serious repercussions for both Firefighter and public safety. This submission examines and provides a comprehensive analysis of each individual proposal. In doing so we have examined relevant legislation, directives, national joint council agreements on pay and conditions of service and the Brigades own 'Standard Operating Procedures'. We have provided a fair and balanced response which prioritises fire cover and public and Firefighter safety, and also takes into account family friendly working practices appropriate to the modern era.

This document represents the views and voices of the professional Firefighters that make up and deliver our Service. We urge you to seriously consider the contents of this document and act upon the views represented when considering the future of Wiltshire Fire & Rescue Service.

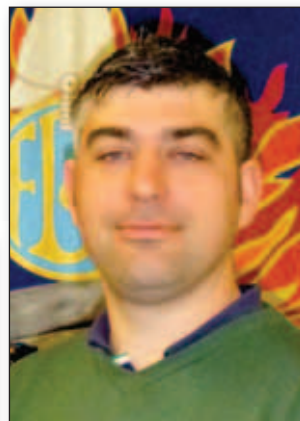
*In constructing this response the FBU takes into account the normal negotiating machinery for changes to conditions of Service within WFRS and this response does not negate the responsibility from WFRS to proceed with National Joint Council (NJC) agreed procedures for resolving issues between the FBU and WFRS.*



**Brent Thorley**  
*Brigade Secretary, Wiltshire*



**Tony Littler**  
*Brigade Chair, Wiltshire*



**Steve Garraway**  
*Brigade Organiser, Wiltshire*



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# 1) Retained Salary Scheme

Firefighters working for Wiltshire Fire and Rescue Service are conditioned to the National Joint Council Scheme of Conditions of Service or "Grey Book". This lays down the hours of duty and payment for working those hours. Currently no "Salary Scheme" exists within the Grey Book.

Wiltshire Fire and Rescue Service proposals for the RDS would, if agreed and implemented, be the largest single change to the Service in a generation.

The Service suggest that by offering a fixed salary, recruitment and retention will be more easily attained than at present, even suggesting that 100% availability of all appliances should be attainable under the new scheme. Crucially, no evidence in support of this claim is provided.

The FBU acknowledges the recent downward trend in retention of Retained Duty System Firefighters, but offers alternative reasoning for this trend.

WFRS put this down to a reduction in fire calls (largely due to alterations of policies such as operational response to Automatic Fire Alarms) and therefore a reduction in income to the Retained Firefighter.

Retained members of the FBU cite the alternative view; the pressure from endless auditing and testing, combined with frustrations of not riding the appliance to incidents due to above mentioned policy changes as over-riding factors contributing to their colleagues leaving the Service and whilst Retained Firefighters

have seen a drop in their income, the majority still state that they "don't do it for the money".

The Fire Brigades Union has many concerns regarding the salary scheme. These have been compounded even further by the fact that no alternatives are or have been considered.

Following extensive consultation with FBU Retained Members the not exhaustive list that follows details the main concerns of Retained Firefighters and of the Fire Brigades Union.

## Lack of Flexibility

One of the main advantages of the RDS is the flexibility afforded to those who work it.

When external life pressures arise, be they from an employer, a customer of a self-employed RDS Firefighter or from a husband, wife or partner who simply asks that they be put ahead of the alerter for an afternoon, the RDS Firefighter can, at present and on most occasions, accommodate this. This flexibility creates a manageable work/life balance for the RDS Firefighter whilst enabling them to fulfil their contractual obligations of what is the most arduous of roles and duty systems.

Feedback has told us that the removal of this flexibility as is planned with the proposed system will lead to many staff questioning if they will be able to fulfil the Services' expectations of them.



Contrary to the Services' reasoning that Firefighters will receive higher remuneration, a large proportion of RDS Firefighters are suggesting that, due to the removal of flexibility, they will be forced to offer less cover than they do presently which will lead to less pay.

Arising from the removal of flexibility, a disturbingly high number of RDS Firefighters have stated that they would not be able to offer any cover during weekend days, largely due to the fact that very few are willing to offer such a commitment to cover every weekend, week in, week out. Unsurprisingly this is more the case in the smaller towns and villages where there are fewer opportunities to 'do something' and generally get out and about with the family following a busy week at their full time employment.

This was particularly the case at one Retained station where just one person said they would be willing to do weekends.

Whilst no formal proposals have been tabled it is the FBUs understanding that the "salary" proposed for RDS Firefighters would be around £14,000 for full cover of 120 hours per week. This equates to 5 x 24 hours of cover = 120 hours per week. Once annual leave is taken away this leaves an RDS Firefighter providing 5640 hours of cover per annum. And for this amount of cover they receive £2.48 per hour before deductions.

## Job Losses

The project leader's documents state that:

"a reduction from 303 FTE (full time equivalent) to 185 FTE, will enable the project to remain cost neutral".

Public and Firefighter safety is dependent upon having the correct number of well trained personnel available at any one time to ensure immediate response to an incident so that operations can be undertaken in a safe procedural way once at a scene of operations.

The Fire Brigades Union will not tolerate a reduction in frontline posts that will compromise Firefighter and public safety.

When announcing the comprehensive spending review, and several times since, the Prime Minister has repeatedly stated that budget reductions will not affect the frontline.

Firefighters are the frontline of the frontline.

From the beginning of this process the Service has maintained the line that the project will be cost neutral, and yet also claimed that the RDS Firefighters in its employ will be paid more. It does not take degree level mathematics to realise that to achieve these aims, the only answer must be to have fewer people. Quite simply, you cannot fit a quart into a pint pot.

The Service states that the RDS budget is currently year on year £600k under spent, and that this is where the additional finances will come from. After discussing this issue with its members, the FBU is disappointed that use of these monies to perhaps enhance current retainer fees to aid in the retention and recruitment of RDS Firefighters which would inevitably lead to better contract adherence and therefore improved fire cover, were never even considered.

## Recruitment and Retention

As stated in the first paragraph, Wiltshire FRS believes in this project to such an extent that it states, following implementation, 100% of appliance availability is "where they should be".

This is a bold statement.

In context this means enough Retained Firefighters available 24 hrs a day 7 days a week 365 days a year. It is a goal that nobody will disagree with. Indeed the FBU fully support such a target.

The Services' belief that they can achieve this target is driven by the blinkered approach that by dangling a larger carrot than they previously have will have the effect of drawing previously uninterested members of our local community out of their houses and into the station yards.

WFRS has a programme of continuous recruitment for RDS Firefighters and yet has consistently struggled to recruit fully. There are various reasons for this; less people now work in the same town as they live, employers are more reluctant to allow the release of their employees at a moment's notice, potential applicants take a long time to go 'through the process' and lose interest, and of those who do make the grade, many resign quite quickly after starting due to the job not being quite what they expected it to be.

If we take a moment to examine the evidence and views of current RDS staff, we will see that the implementation of the proposed scheme will make no difference or possibly even have a negative effect

upon recruitment as well as having a potentially disastrous effect on the retention of current RDS Firefighters.

Fewer people will still live in the same town as they work.

The assumption that the inducement of perhaps a £6000-£7000 per annum "salary" will attract the masses, who, up to this point, have had no inclination to join the Fire Service is not based upon empirical evidence.

The Service has outlined strategies to aid in recruitment; a 'marketing plan', improved and quickened lines of application, more frequent Retained initial courses and the like. The FBU therefore asks the question, why wait until the introduction of the salary scheme? If they are strategies that will help then, then they are strategies that will help now.

With regard to retention of current staff, we have already detailed the impact on the amount of cover RDS staff feel they will realistically be able to commit to, and this is without many explaining to their employers the impact it will have on their full time jobs. When this occurs, it is expected that many employers will simply suggest that having to guarantee their release will be unacceptable, leading to a choice of 'us or the Fire Service', a situation whereby the RDS Firefighter will have no choice but to choose their main employment as it is this that provides the main income from which bills are paid, mortgages and rent are sustained and families supported.

## Fire Cover Impact

Currently the Service has large holes of availability. With the information gained from and with thoughts of Retained Firefighters in mind, the evidence points towards the current problems getting worse, not better. Furthermore, both South Wales and Kent (who have already implemented similar systems) also saw a large number of Retained staff leave the Service due to the demands a salary scheme placed on their lives and whilst it may be true that some staff did return to the Fire Service, levels have still not returned to pre-salary scheme levels.

If WFRS also saw this same trend (of staff leaving) initially, the Service would be at melting point, and would simply not be able to crew its appliances and fulfil its statutory duties.

It is vital to bear in mind that this would also be against the backdrop of reduced numbers of Wholetime Firefighters, especially in the evenings and weekends when the 28 staff on the nucleus duty system will be unavailable for redeployment to backfill shortages as they (together with the day crewed staff in the evenings) will be unavailable for 'detached' or 'out-station' duty.

To better understand the possible impact we must briefly look at the numbers.

On a normal weekday, the Service will have a maximum of 70 and a minimum (incl. leave, excl. any sickness) of 50 Firefighters on stations.

At the weekend these numbers drop to 42/30 (max/min) and every evening to 14/10 (max/min).

As we now know many RDS Firefighters are unable to provide weekend cover, these worrying figures only go to demonstrate further why the Fire Brigades Union is urging the FRS to rethink these potentially catastrophic proposals.

## RDS Training

Under the proposals, RDS Firefighters will have 120 hrs per annum to maintain competencies.

Whilst on the face of it this appears to be a slight increase in training time, this is also to include live fire sessions at the Service Training and Development Centre and the trauma/oxygen therapy and administration refresher days all Firefighters must attend.

These two courses alone account for approximately 18 hrs.

The Service recently acknowledged the difficulties experienced by RDS Firefighters maintaining their core skills by removing some of the working at height equipment from Retained appliances. This removed the ability of Retained crews to stabilise a situation where a rescue at height would be required but left them, sensibly, with the correct equipment to enable the crews to ensure their own safety when working at height.

This decision was taken largely on the basis that maintenance of these skills was difficult to achieve, and that should an accident arise with such equipment it was likely to have fatal consequences.



Due to the planned removal of the specialist rope rescue team from Trowbridge, the Service has U-turned and is now planning to bring several of the RDS stations back up to speed in 'level 2' rope rescue.

In reality, the provision of an extra 15 mins per week training cannot ensure competency and safety in this area.

The Services' plan to place a single aerial appliance at Devizes, and to have it crewed solely by RDS Firefighters is incredulous. As we have shown already, the training will be impossible to achieve.

The Services' own training matrix states that 60 hrs a year is required to maintain competence in the safe operation of this appliance. These figures are called into question however by the Services' own costing justifying the removal of one of the aerals which states 80 hrs training per person, per annum.

On top of this, the inevitable deskilling of Wholetime staff that are already trained in the use of this appliance, would certainly mean that a proportion of the RDS would have to expect to become instructors (as the Wholetime at Swindon and Salisbury are currently).

To propose that an RDS Firefighter could maintain their core skills, take on the skills required to operate, and for some, instruct on an aerial appliance is simply unachievable and unfair on the individual.

Similar issues arise regarding the removal of the four Emergency Support Units (ESU), and their replacement with one Heavy Rescue Vehicle (HRV).

This new appliance is intended to be stationed in Trowbridge, and once again crewed solely by RDS Firefighters.

Whilst it may be accepted the appliance itself may be less hazardous, the same points towards RDS Firefighters simply not having enough time to maintain competencies in both a pumping appliance and having the sole responsibility for the HRV, which will carry life saving equipment, whilst the Wholetime staff at Trowbridge have just responsibility for a single pumping appliance questions common sense, and once again creates a worryingly hazardous environment for Firefighters and the public alike.

## Summary

To expect mass recruitment of Retained Firefighters is simply unrealistic. Streams of people in our small towns and villages wanting to give up large amounts of their time to become Retained Firefighters just do not exist. If they did, they would be there now.

Furthermore, to remove the degree of flexibility that RDS Firefighters are currently afforded will be to the detriment of retention of these members of staff, and evidence suggests provide little, if any, advantage to recruitment of more Firefighters when it appears the need will be greatly enhanced.

To expect both current and potential RDS Firefighters to give the level of commitment WFRS is going to expect, and to suggest even further that the FRS could become a person's 'primary employer' is totally unfounded as no evidence has been supplied to support this theory.

After extensive consultation with FBU members, especially RDS Firefighters across the whole county, and from studying the Services' own documentation and presentations, the Fire Brigades Union must conclude that if implemented, the Retained Salary Scheme will place the safety of both Firefighters and the public of Wiltshire at risk, be that from extended response times due to lack of personnel available or from RDS Firefighters, through no fault of their own, struggling to maintain competence.

The Service has consistently stated that it wants to hear the voices of its staff. As their representatives, we have done this and the message is loud and clear; these proposals will not achieve their intended outcomes and will negatively impact upon skill levels, staff numbers and moral.



## 2) 12 hour shifts

Currently shift stations work a 2-2-3 system; 2 days working from 0900-1800, followed by 2 nights working 1800-0900. WFRS proposes to change these to 0700-1900 (days) and 1900-0700 (nights) respectively.

Day Crewed stations currently work a 3 days on 3 days off duty system, providing 'positive' on station hours from 0830-1800 and being available on call for all times outside these positive hours as Retained Firefighters.

WFRS propose to align these stations with a 12 hour shift across the board starting 0700 (1900 for nights) through to a 1900 finish (0700 for nights).

The evidence the FRS provides to justify these changes does not stand up to scrutiny.

It suggests that large savings may be achieved, as less overtime will be worked at peak call times between 1700 and 1900. Their own graph evidencing this shows that a large volume of calls are still received between 1800-1900 and so those Firefighters responding to these calls would still incur overtime as they are still highly likely to be at the incident past the proposed change over time of 1900.

To ensure clarity in understanding this critical point, in real terms it means that because a fire call may come in, at say, 1830 it is highly probable that the crew will still be on scene past the cut off point where overtime is incurred.

Even if we go with the FRS's assessment of this, the cost saving would be negligible.

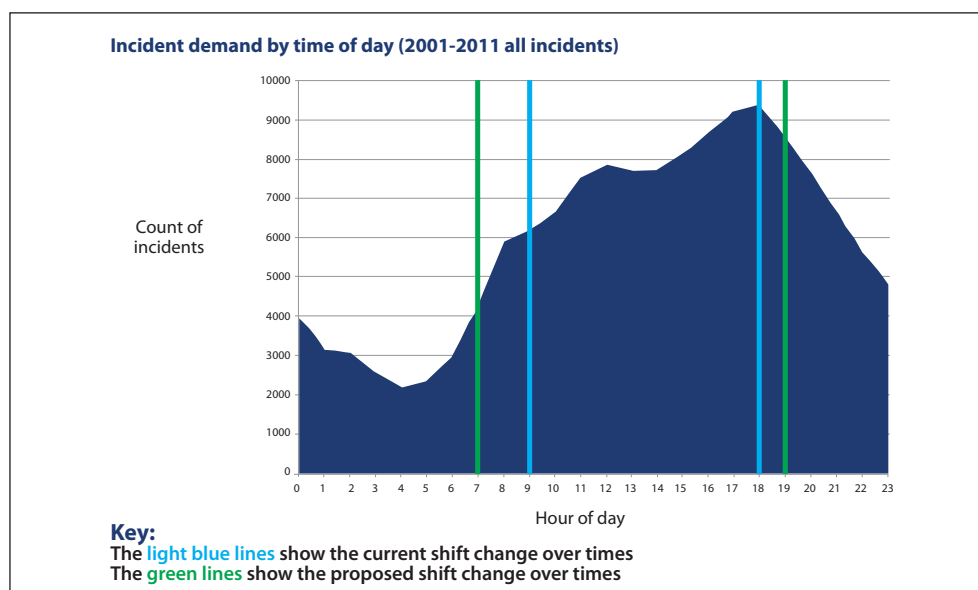
WFRS have placed a lot of focus on an academic study into shift duration in attempting to justify the rationale behind the change of shift duration and start/finish times.

In essence the study (RR446; The Development of a Fatigue/Risk Index for Shift Workers 1996) looks at various groups of workers, from air stewards to oil riggers. The study does NOT look, nor refer once to Firefighters. It provides evidence to show that when a worker works continuous night shifts the risk is heightened. The study does NOT take into account the almost unique working routine of the Fire Service, which affords Firefighters rest for a proportion of a night shift; fire calls permitting.

The study does however explain that when people are required to start work earlier, risk of accident from fatigue is increased as most people will not go to bed earlier the night before to allow for their earlier start and therefore become progressively more tired as the day goes on. This risk is maximised about 10 hours into the working day.

In WFRS terms, with a 0700 start, this maximum risk would be at 1700 – just as the Service is approaching its peak call time.

The FBU requested accident statistics for the past 3 years from WFRS that show accidents or near misses that have occurred between the hours 0700-0900, and which show the outcome/reason for the occurrence as fatigue. The Service was unable to narrow down the times, and so the response covered all accidents/near



*NB. The graph shows only a 23hr day that condenses it, thereby making the call density appear more dramatic. This is an error on the part of WFRS from whose "Consultation Document" the graph was taken.*

misses regardless of time of day. A 'Nil Return' was received, not a single occurrence in all that time has been put down to fatigue. It would certainly seem apparent that our current working times are as safe as they need to be, even the most thorough Risk Assessment would score this as perfectly acceptable with no requirement to change anything to reduce the risk.

*So what would be the impact to the staff if these proposals were introduced?*

WFRS have stated that one of the benefits to staff is increased rest time between shifts. This is simply not true for Chippenham, Trowbridge and Westlea who, as explained earlier, currently work 0830-1800. This would mean 2.5 hours less rest a day.

Personnel working the current day crewed system and whom have young children would hardly see their children for their three days duty, as they would still be in bed before work, and going back to bed when the Firefighter came home. Once again this 'oversight' from the Service would certainly fail their aim of it being "*essential that the first priority is the health, safety and welfare of employees*".

When considering childcare together with 12 hour shifts, the FBU has failed to find any childcare provider which is open long enough to accommodate a 12 hour day. Furthermore, anecdotal evidence from Firefighters confirms that private child minders would not be able to provide their service for such a long period in the day. Even if, in theory, a service were available the cost and affordability of using it would be extraordinarily prohibitive.

Dorset FRS proposed similar measures and at the request of the FBU a survey of all childminding providers in Dorset was conducted. This also failed to find any providers of childcare to cover their proposed shift times. Are WFRS prepared to conduct a similar exercise?

Has WFRS carried out an Equality Impact Assessment on these proposals as the FBU believes there will be unacceptable negative impact on women Firefighters? If such an assessment has been carried out, can this be provided?

The FBU National Women's Committee, made up from women Firefighters from around the country has carried out much research on the issues of shift timings and the current 2-2-3 shift pattern. Their findings are attached at Appendix 1 of this response document.



**Salisbury Cathedral – Heritage high rise risk**

Finally, it is important to consider staff enforced to working 12 hr shifts and their travelling times to work.

A start time of 0700 will see those members who cycle to work, of which there are many, making their journeys, both to and from, in darkness for several months of the year. It must be noted that the Service actively encourages cycling to work, evidenced by its commendable participation in the 'cycle to work' scheme.

For staff that currently uses public transport, difficulties will be experienced as the majority of public transport does not run at the appropriate, required times to get to/from work.

Those who drive to work will be impacted by having to travel at times when conditions are at the worse, especially in the winter.

These factors can only lead to more staff leaving their bikes in the shed and instead of walking or taking public transport will resort to their cars (for some this will mean having to buy a car for this sole reason) and will be contrary to the WFRS' aim of reducing emissions and improving the Services' carbon footprint.

When all this evidence is taken into account, and the negligible unproven cash savings the Service claim they will make is disregarded, the question must be, "Is this reform for reforms sake?"

### 3) Wholetime Duty Systems

*"The need for a flexible approach to resource allocation in order to maximise effectiveness is paramount in an emergency Service. In making these allocations it is also essential that the first priority is the health, safety and welfare of employees."*

The above paragraph is the introduction from Wiltshire FRS' own Standard Operating Procedure (SOP) 139; Crewing.

Given the emphasis on health, safety and welfare of employees the FBU must ask why WFRS proposes to implement duty systems that increase risk to both Firefighter and the public. Issues such as longer working days and less Firefighter availability, both of which would have a radical effect on the staff's welfare through duty systems, such as 'day crewed plus' which would see personnel confined to station boundaries for up to 120 hrs at a time, with what can be best described as "visiting rights" for families.

Following extensive consultation with our Wholetime members the, not exhaustive, list that follows details the main concerns of Firefighters and of the Fire Brigades Union.



#### Day Crewed Plus

The Day Crewed Plus (DC+) system is a system of work, which on the face of it will provide 24hr fire cover 'on the cheap'. In reality, the FBU's research has shown the system to be one thrown back to Victorian days, which will see Firefighters working days on end penned within the station boundaries.

The basis of DC+ is that Firefighters are on duty for 120 hrs continuously. From 0700 to 1900 on station and then from 1900 to 0700 in a shared accommodation block within the grounds of the fire station.

This system falls well outside the Grey Book, National Conditions of Service. The Grey Book is a nationally agreed document, between employers and employees, detailing the terms and conditions of Fire Service workers, including duty systems. The DC+ system does not meet the requirements of the Grey Book.

In recognition of the intense, protracted nature of the system, WFRS has stated that when the crews are on standby in the accommodation block they will respond to 'life calls' only. Either RDS Firefighters will respond to all other fire calls from the DC+ station or Wholetime crews from another station, creating a reduction in fire cover via slower response times between 1900 and 0700.

It is worthwhile pointing out that life calls do not always come in as just that, and not infrequently the regular cooker fire or car fire is in fact a life threatening "persons reported" fire or "persons trapped road traffic collision". It must be stated statistics show that most fire deaths occur during sleeping hours, when the public are in bed and therefore unaware of a growing fire.

Confinement to station ensures that any employee working this system would have fundamental difficulties with work life balance. This problem is exacerbated by the proposal for Firefighters to be 'self rostering', (i.e. select which days they would like to work on a rota basis). Whilst there may be a slight benefit when the Firefighter has first or second 'pick', after this the Firefighters 'choice' of when s/he wants to work is narrowed to the days that are left. This inevitably creates a wholly unworkable situation for any sort of work/life balance or the possibility of creating a standardised work pattern. The vast majority of Firefighters partners will work 'normal' hours in a regular, routine manner. To attempt to manage childcare, or any other caring responsibility with such



uncertainty as to when someone will be at home or not is simply unworkable. People need a routine working pattern, so that a routine home life including childcare arrangements and the like can be established.

If we take an empathetic view of the worker on a DC+ station, we can begin to appreciate even further the difficulties that it will present. Working away from home for 5 full days (120hrs) three times a month means participation in raising children, attending parents evenings, school sports days and many other important aspects of family life would be seriously compromised and attendance at events that are usually taken for granted would be near impossible to guarantee being at – hit and miss at best, again adding unnecessary strain to home life and resulting in a negative effect on the welfare of the Firefighter.

The impact does not stop with children. Partners will be unable to commit to engaging in weekly activities due to the unstructured nature of their partners shift pattern. It may also have a huge impact on the partners working life, as they would be unable to provide their employer with that degree of flexibility they may currently afford them if they have to get home/to the nursery/childcare provider in time, when previously the Firefighters partner would have been able to commit to take on some of these routine tasks. Single parents would simply not be able to accommodate this detrimental way of working.

This certainly seems to fail the Services aim of making the employees' welfare their first priority, indeed, this system seems solely aimed at the employer rather than the employee.

WFRS claim, correctly, that this system will not suit everyone. Common sense from the evidence provided above will lead us all to understand that it will not suit those with children. Whilst it may be the case that the younger, single Firefighter may be less unhappy to work DC+, the demographic of the Wiltshire Firefighter simply does not have a raft of these 'suitable' people.

Due to the Service's lack of recruitment for some years, WFRS is now an ageing Service; devoid of 20-25 year old newly employed Firefighters. **Figures from WFRS Diversity Data for 2011/12 show that as of 31st March 2011 (The last available figures) only 19 out of 690 employees were between the ages of 17 – 24.** These figures are for total employees, both uniformed and non uniformed. So the actual figures for uniformed staff are lower than 19. WFRS will suggest that they will seek, and will get purely volunteers to work the system.

## Financial handcuffs

The Service already experiences problems with staff on normal day crewed stations being financially tied to their stations (due to the extra Retained/rent allowance element of their salary). This creates an environment where fewer Firefighters go for promotion or want to move to other stations because they simply cannot afford to take the wage drop.

This situation would be exacerbated on a DC+ station, and would lead to promotion options for those on the system limited to 'dead men's shoes', and therefore reducing further the promotion options available to those not on a DC+ station.

WFRS have published the figure of £7613.73 as an additional payment to Firefighters who work DC+.

The Service will argue that this figure (which is below minimum wage and shows blatant disregard for the nationally agreed rates of pay), is set at that level as the Firefighters are working in an 'on call' fashion. The FBU would argue that this method of working is completely different to that of the traditional, Retained, on call Firefighter as staff remain at work- in real terms this means that personnel cannot leave the boundaries of the station yard to maintain a normal family life or to carry out day to day activities. There is no better illustration of this than the example of another FRS who had to implement a system of Firefighters paying 'rent' to the FRS for their rooms so that the FRS could claim that Firefighters were in fact living in private accommodation.

*"In making these allocations it is also essential that the first priority is the health, safety and welfare of employees"*

*Standard Operating Procedure (SOP) 139; Crewing.*

## Summary

In the evidence provided above we can see that day crewed plus is an unworkable, unmanageable and unpractical method of working, especially in a Service the size of Wiltshire where the demographic is mostly diametrically opposite to the model Firefighter that would be required to work this outdated duty system.

If Wiltshire Fire and Rescue Authority (WFRA) accept this proposal the FBU will have no choice but to seriously consider the potential for legal action regarding a possible breach of appropriate legislation.

Even prior to the proposed implementation, the system is proving to be deeply unpopular with those who may be forced to work it. There are deep concerns about future abilities to either transfer off the system once financially tied to it, as well as restricting promotion prospects for all, which will undoubtedly arise as a result of having a majority of day crewed and day crewed plus stations within the Service.

In future years the FBU can envisage a shortfall of Firefighters at DC+ stations as when natural vacancies occur, evidence suggests that there will be few Firefighters volunteering to work the system.

Day Crewed Plus is a system which shows flagrant disregard for employees forced into working it, under the guise of a 'choice' or to have 'chosen' or 'volunteered' to it.

Referring to 12 hr shifts, the Fire Brigades Union has studied the evidence supplied by Wiltshire Fire and Rescue Service, and without exception contests the validity and reasoning behind the desire to implement them.

The FBU has provided a more solid foundation of evidence that shows that the introduction of 12 hr shifts could indeed place Firefighters and therefore the public at a greater risk, not the reduced risk the Service would have the Fire and Rescue Authority and the public believe.

The introduction of day crewed plus is about one thing: cuts.

When announcing the comprehensive spending review, and several times since, the Prime Minister has repeatedly, publically stated that budget reductions will not affect the frontline.

Firefighters are the frontline of the frontline.

***The need for a flexible approach to resource allocation in order to maximise effectiveness is paramount in an emergency Service. In making these allocations it is also essential that the first priority is the health, safety and welfare of employees.***

Standard Operating Procedure (SOP) 139; Crewing.

The Fire Brigades Union asks the Service how it can consolidate the aims from their own SOP and the proposed introduction of such working practices.

## 4) Hub Stations

WFRS plan to place 7 Wholetime staff at four currently RDS stations must be examined with extreme caution.

Primarily we must understand that these staff will not be in addition to the current establishment, but drawn from it. A cut in the numbers of personnel from the watch's at Swindon, Salisbury, Chippenham and Trowbridge, and the proposed change of duty system from 2/2/3 to DC+ at Stratton and Westlea will provide the 28 Firefighters to work at the hub stations.

Also, it is the Unions' belief that, when examined further and taken into context with the Services proposals as a whole, that there will be no actual increase in fire cover.

The FBU are also concerned that the roles the Service wish the personnel stationed at the hubs to carry out, may in future lead to Wholetime firefighter posts being replaced with corporate staff posts which would reduce operational establishment further.

Fire stations have and do work together; at incidents, on preventative work and administrative work to ensure efficient planning and delivery of all aspects of the FRS.

The impact upon the staff that will be required to work this system must also be taken into account, especially when nearly all these personnel are accustomed to, and have their lives built around doing shift work.

### Fire Cover

The first answer the Service gives to its' own question Why Change? is "*to improve operational response*"

Although the FBU disputes the Services' belief that the proposed Retained salary scheme will succeed in its aim to achieve 100% cover 24/7/365, the Service do believe it but offer no evidence to support this claim. This is important as when we marry that proposal with the plans for hub stations, we can understand that an improvement in response will not be achieved.

The key to understanding this is to realise that the Wholetime personnel working on these stations will not be there to primarily crew fire engines. Subject to there being enough Retained staff available, which the Service fully believes it will achieve, the Wholetime staff will be involved in tasks as diverse as the standard risk reduction work such as the work stations currently perform to "*supporting partner agencies such as health or*

*Social Services*", "*provide greater support for local council work*" and "*understanding partner agency enforcing organisations and providing intelligence (e.g. food hygiene, Health and Safety, Border Agency, housing)*".

The FBU does not accept that such functions fall within the role map of a Firefighter and believes that this may lead to the deskilling of highly trained staff in order to fulfil inappropriate tasks, when they could and should be deployed in their core function: protecting the public of Wiltshire.

The FBU fully supports risk identification work including familiarisation visits to factory and hotel premises etc., but the Services' proposal would make this core function ad hoc and inconsistent.

### Training

Few people would challenge the understanding that Firefighters are part of a team. Indeed, there are probably very few professions where being a member of a team; having that understanding of what your colleague is going to do, what s/he is capable of, what they expect of you when the pressure is on matters more.

The concept of the hub stations would without doubt, jeopardise this ethic. Training together is core to the construction and maintenance of a team. With an individual Firefighter potentially being sent to work across a range of stations, performing a range of tasks within the 'community', not being expected to ride the appliance, will lead to occasions (when they *are* needed to get on the fire engine) when they will never have worked or trained with the person they are about to enter a hazardous risk area with.

This is unnecessary when, as said previously, Firefighters could both complete the 'standard' community work and risk reduction work WFRS wants to achieve from the hub stations, from their current location as part of a normal watch environment, with the added benefit of regular, scheduled training whilst maintaining the all-important Fire Service 'team' ethos.

### Concerns for the future

In the introduction to this section we eluded to the Unions fears for the future with regards to further cuts.

During meetings with members, the same comments



kept being brought up. If Firefighters are not there to ride appliances, then what is to stop the Service replacing Firefighters with corporate staff in the years to come?

It is the FBU's opinion that the cuts proposed within this consultation will, if implemented, have a massive negative impact on the Service for years to come.

The Union cannot and will not idly stand back and let a plan for further cuts in the future to go unchallenged.

### **Staff Impact**

All Wholtime frontline personnel within WFRS work a shift system.

Under the hub station proposals 28 out of potentially 140 Wholtime staff will be required to work a shift system few want. The current shift patterns afford personnel the ability to look after children on their days off, and partners work arrangements have been built around this. The impacts on family life, and the additional childcare costs that would be incurred to many would, on a financial level, prove extremely challenging.

For many the cost of simply getting to and from work would prove prohibitive. The rising cost of fuel against the background of a 3 year pay freeze, the rising cost of living and an increase in pension contributions means that the prospect of spending an extra £100+ per month on fuel just to get to work and back would make the situation untenable for some, unsustainable for many.

As detailed in the Wholtime Duty Systems section, the knock on effect to promotion prospects would look extremely bleak. Those on the day crewed or the proposed day crewed plus systems would be fiscally tied to their stations, and therefore it may be unlikely for promotion opportunities to open there, whilst the unpopularity of these systems would mean that converse popularity of the regular 2-2-3 systems would again result in very few prospects arising there, as those tempted by promotion who work this rota would be unwilling to forego the shift pattern they enjoy working.

It is of utmost importance to consider the Retained staff's opinions when examining the hub stations.

Continually, Retained staff at the proposed hub stations have stated that they feel undermined by the



management of WFRS due to these plans. The local managers within the stations feel they are being told, inadvertently or otherwise, that they must be struggling to run their stations, which they are not, if the management feel the need to place Wholetime staff on their station to take over the running of them.

This will lead to demoralised staff who feel undervalued in comparison to their Wholetime staff.

## **Environmental Impact**

Consideration must be given to the environmental impact of the hub stations.

WFRS has responsibly made protecting the environment one of its 5 'Core Values'.

The introduction of the hub stations will mean a substantial increase in the Services' carbon footprint due to several issues.

There is a maximum potential for 28 staff members to be carrying out 1120 journeys to and from work per month, allowing for leave the minimum of 20 personnel will still carry out the not insignificant number of an extra 800 journeys.

Whilst at work they will be driving around within their communities from station to station, and to carry out the various tasks etc planned for the hub personnel.

The FBU expresses concern with regard to these issues and the seeming conflict with Services' Core Aim, and requests a copy of the environmental impact assessment carried out by WFRS in relation to these proposals.

## 5) Special Appliances

### **"Reduce the number of aerial appliances from two to one and relocate to Devizes"**

In their "Draft Consultation Document" Wiltshire FRS outline a proposal to reduce the number of aerial appliances available for operational emergency cover from the current two to only one to cover the entire county.

The Service attempts to justify this by saying:

***"We have carried out an analysis of the buildings within our area and this has highlighted the limited number of high and medium rise buildings we have – and only a few have suitable grounds for our aerial appliances. Our analysis has shown that our existing aerial appliances attended an average of 31 incidents per year. With this in mind, we believe it is more effective to have one aerial appliance (with a second in reserve) based at Devizes in the centre of the county to respond to the limited number of incidents where it is required."***

The driver behind this decision is, of course, the same driver behind the entire package: to save money; and as a justification the authors of this particular proposal have made a crude "analysis" based on the number of calls versus the supposed viability of the appliance. This crude assessment is, in the view of the FBU, unprofessional and inappropriate as it misses out the crucial elements of both the purpose of the appliance itself and the primary purpose of the Fire and Rescue Service overall.

Aerial appliances form a vital part of the effective and safe emergency response provided by Wiltshire Fire and Rescue Service to the community overall and the importance of emergency response are widely recognised. The FBU agrees with the House of Commons Communities and Local Government (CLG) Committee, which wrote recently: ***"The primary purpose of the fire and rescue Service is the prompt and efficient mobilisation of Firefighters in response to a fire or other related incident, in order to save lives and protect property. This is a key aspect of public safety."***

In order to ensure that this primary purpose is delivered effectively, Fire and Rescue Services' are required to assess the risks within their geographical area and provide plans to ensure that in the event of a fire sufficient Firefighters and equipment arrive in time to implement firefighting procedures which protect life and property whilst not exposing Firefighters to undue risk. This is risk-assessed "response planning".

In order to determine the "weight" of response to incidents – i.e. the number of Firefighters who should be sent to an incident together with the type and number of appliances needed to resolve it effectively and safely – Fire and Rescue Services' 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, Fire and Rescue Services' should also ensure that the tasks are planned in such a way as to reduce risks to the Firefighters carrying them out. In short, authorities are required to carry out a detailed risk and task analysis.

If the Fire Authority in Wiltshire is to make an informed decision regarding the removal of vital appliances, equipment and/or Firefighters then they should only do so based on a properly prepared and developed risk – assessed response plan. Not on a crude assessment based on a snapshot of the number of calls that a particular appliance may have been dispatched to at any given time.

### **Response Times and Why They Matter**

The 2 aerial appliances based at Salisbury and Swindon form an essential, and life saving, part of the emergency response provision of Wiltshire Fire and Rescue Service. They are used for a wide variety of vital work including use at high rise fires and rescues, aerial water provision, firefighting and dousing, and other specialised requirements.

The appliances are based at Swindon and Salisbury for a specific risk based reason. They are there in order to provide rapid response cover within the two main risk areas for buildings of height and are written into the Services' Site Specific Risk Information plans, (these are plans which are available to crews on Fire Appliances as part of the pre-planning in dealing with emergency incidents.)

Examples of the areas and buildings which the aerial appliances specifically cover include Salisbury Cathedral, Longleat House, David Murray John building in Swindon, Brunel shopping centre etc. Currently Swindon has the most properties above 3 floors in Wiltshire including several blocks of flats as well as many other commercial properties that would require the attendance of an aerial appliance. This is also the case in others areas, notably Salisbury. It must also be noted that there is a high potential for future growth in many areas, especially Swindon and a



change of planning laws that frees up more land for development.

Because of where the two appliances are based the current response times to areas of risk are rapid and effective:

**Current times at normal road speed:**

- Swindon appliance to Swindon High rise including Town Centre maximum travel time – 10 mins
- Salisbury appliance to Salisbury Cathedral maximum travel time – 7 minutes

However these response times would dramatically increase if the proposals are accepted and the subsequent change to only one appliance based at Devizes is implemented.

**Example of the Increase in Response times if proposal is accepted**

Devizes to:

- Swindon 55 mins – an increase of 45 mins
- Salisbury Cathedral 58 mins – an increase of 51 mins.

**The Importance of Rapid Response to Deal with Fire Growth and the link to Time**

Rapid response to a fire is vital because fire growth is rapid and its consequences can be devastating.

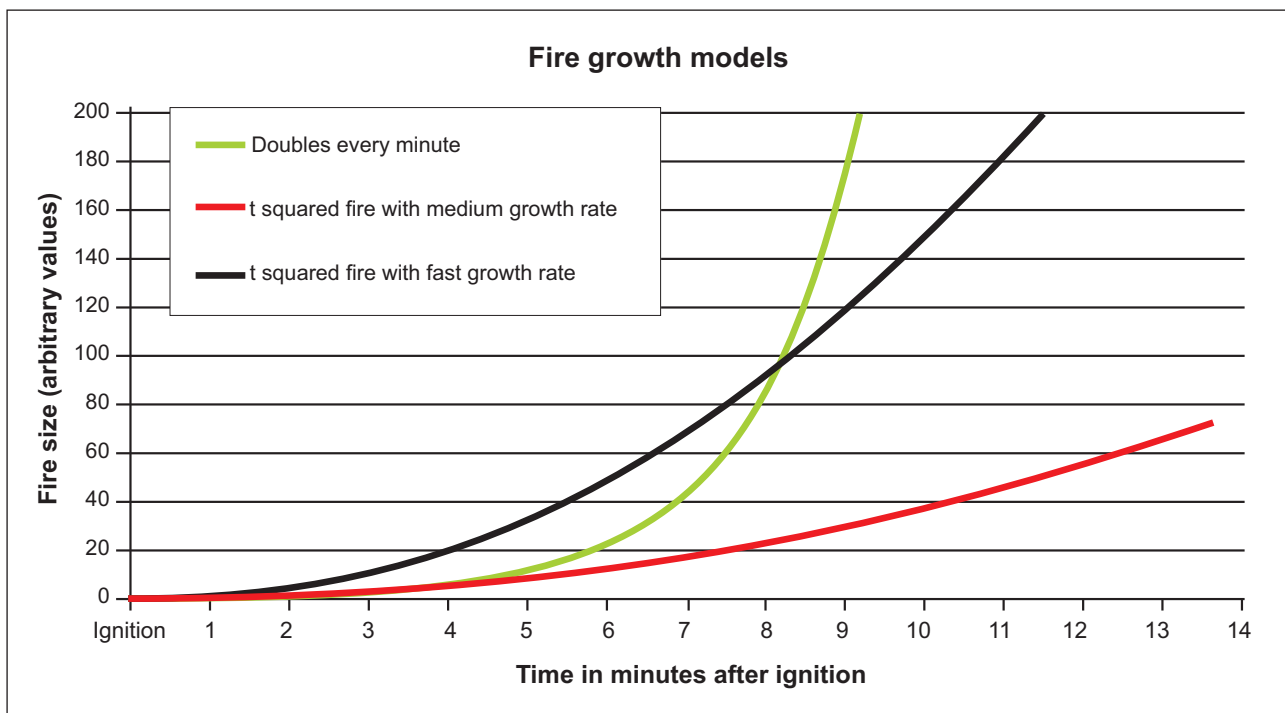


PHOTO: EMMA CRIPPS

**High rise building, Swindon**

The size of a fire is sometimes described as "doubling every minute". If the size of such a fire were plotted on a graph, it would create a curved line like the one shown in the table below:

It could happen, but strictly speaking, there is no reason why a fire should really double in size every minute. When fire engineers work out fire safety solutions for buildings, they commonly assume that a fire's rate of growth can be slow, medium, fast or even ultra fast, but that in any of these cases its size increases in proportion to "time squared". They call these fires "t squared fires". A medium and a fast "t squared" fire are also shown in the table.



**Table 1.1: Average response times for primary fires in England**

Primary fire category	Average response time (minutes)		Increase in response time
	1996	2006	
Dwelling fires	5.5	6.5	18%
Other buildings fires	5.7	6.8	19%
Vehicle fires	6.7	7.9	18%
Outdoor fires	9.7	11.1	14%

Source: Greenstreet Berman/CLG report, Table 3, page 17

**The important thing in the table is that the rate at which the size of any fire increases itself increases with time.**

For example, between minutes 3 and 4, the fast-growing fire increases in size by about 12 units, but between minutes 9 and 10 it increases in size by over 40 units.

The importance of rapid emergency response when dealing with fire, and the consequences of increases to response times is widely recognised throughout the Fire and Rescue Service and the wider fire industry.

In 2009, the Department for Communities and Local Government (CLG) published a report called *Review of Fire and Rescue Service response times: Fire Research Series 1/2009*, written by Greenstreet Berman Ltd. Table 1.1 from that report showed how average response times in England had increased between 1996 and 2006.

The authors of the report used the Fire Service Emergency Cover toolkit (FSEC) to predict the effect of increased response times. FSEC predicted that increased response times may contribute to:

- 13 additional fatalities in dwelling and other building fires each year;
- possibly 65 additional deaths in road traffic collisions (RTCs); and
- An £85m increase in other buildings fire damage.

It is the view of the FBU that these reports and the evidence on which they are based prove what professional Firefighters have always known, that the longer a fire is allowed to burn the larger it becomes; and the quicker that the right resources get to a fire the more lives can be saved and the potential for damage to property is rapidly lessened and contained.

This is a vital part of the opposition by the FBU to the

proposal to have only one aerial appliance covering all of Wiltshire: If the Service carries through with this proposal then the response times of this appliance will increase with the potential consequences to fire growth (especially in high rise buildings) and rescue capability.

Professional Firefighters also know that the essential height, water capability and flexibility of use that aerial appliances give, together with appropriate speed of response, form a key part in making them indispensable in fighting and extinguishing fires in a wide variety of operational circumstances.

**The Cost of Fire to property, businesses and the economy**

While saving lives is the overwhelming priority in emergency response, the impact of fire on people's homes, workplaces and wider society is also important. It is widely recognised that longer response times also mean greater damage to property – with significant costs to families and businesses and to the economy as a whole.

This cost has been outlined by the insurance industry, who has reported larger real-terms rise in insured losses due to fire. The Association of British Insurers (ABI) report *Tackling Fire: A Call for Action* (December 2009) stated that **"the number of fires has been falling, but the cost of these has been increasing: the average cost of fire claims more than doubled between 2002 and 2008"**.

The ABI's analysis of fire trends showed:

- Fire damage claims in the first half of 2009 cost £639m – £3.6m each day. This follows on from the £1.3bn fire losses in 2008, a 16% rise on 2007 and the most expensive year ever.

- Between 2002 and 2008 the cost of the average fire claim for both commercial and domestic fires doubled to £21,000 and £8,000 respectively.

The authors of the 2009 Greenstreet Berman/CLG report used the Fire Service Emergency Cover (FSEC) model to estimate that increases in Fire Service response times had already caused £85m of additional loss for 2006 in "other buildings fires". Using real data provided by the Association of British Insurers (ABI) rather than a fire cover computer model, the Greenstreet Berman/CLG report also calculated that increases in Fire Service response times had already caused £307m of additional loss.

What is more, the report found a "strong correlation" between average loss per fire and response times.

## Sites and Areas of Heritage and Cultural Importance

Of course the cost to society is not just in monetary terms, as significant as this is. The aerial appliances in Wiltshire cover buildings in the County that have irreplaceable significance in heritage terms. These include, but are not limited to:

- Salisbury Cathedral;
- Malmesbury Abbey;
- Marlborough High Street;
- Marlborough College;
- Longleat House;

The importance of these buildings and areas in cultural terms is currently fully recognised by Wiltshire Fire and Rescue Service. The Service has spent a great deal of time and resources developing special risk based plans to deal with fires at buildings such as these.

Part of these plans include putting in place a "Pre Determined First Attendance" which ensures that the correct number and type of Fire Appliances and Firefighters are initially mobilised to an emergency call in a given building. The purpose of this is to make sure that the correct resources are on the scene as quickly as possible. A pre determined first attendance is vital in ensuring that incidents can be dealt with rapidly, safely and the potential for damage from fire is limited.

As an example, this is the pre determined first attendance to a fire at Longleat house:

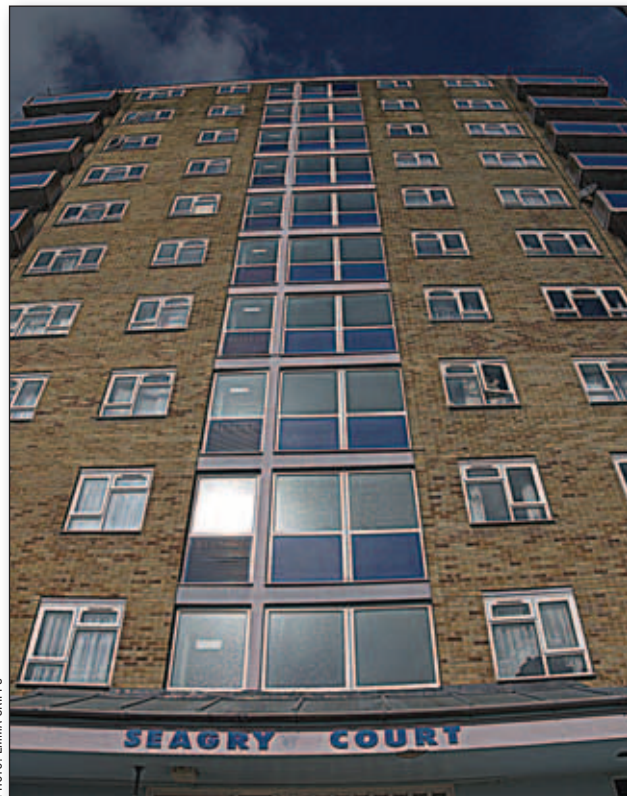


PHOTO: EMMA CRIPPS

### Seagry Court, Swindon

- 8 pumping appliances,
- 2 Emergency Support Units,
- **2 Aerial Appliances,**
- 1 Damage Control Unit

A rapid response to an emergency incident in these locations by these special appliances is vital in limiting any damage which could have significant and irreplaceable consequences. A key part of the pre determined attendance in many of Wiltshire's most important heritage buildings is one or more aerial appliance. This is mostly due to the height and other special factors of these buildings. The importance of aerial appliances in dealing with fires in these situations cannot be overestimated.

## Summary

Clearly the driver behind this proposal is the quest to save money as part of a deficit reduction strategy. However the FBU believe that these level of cuts in the frontline Fire and Rescue Service is a false economy which could ultimately cost the tax payer far more than it saves.



The current two aerial appliances in Wiltshire provide essential height, water capability and flexibility of use which, together with appropriate speed of response, form a key part in making them indispensable in fighting and extinguishing fires in a wide variety of operational circumstances.

They are vital in protecting Firefighters and the public in situations where only they can provide an effective response. Their specialist use protects property, businesses and irreplaceable buildings vital to the heritage of not just the county, but also the country.

In societal terms the FBU firmly believes that they are a key part of a planned emergency response which, in overall terms actually saves the taxpayer and wider society millions of pounds a year.

With all the talk about cuts to public Services in order to achieve deficit reduction, has anyone asked the public whether they think it is a good idea to save £1.8m by cutting the Fire Service – and then paying for that decision many times over in lost business, lost employment, building damage, higher insurance premiums and increased commodity prices?

## Emergency Support Units (ESU)

Wiltshire Fire and Rescue Service attempts to explain the reduction of ESU's from 4 to 1 in its consultation document in 8 lines.

To simplify the removal of crucial lifesaving appliances into a couple of meaningless sentences does a huge injustice to the vital role these appliances can play at many incidents, most importantly road traffic collisions (RTC's).

The ESU's that are currently within the Service are deployed strategically, one each at Swindon, Salisbury, Trowbridge and Chippenham.

Swindon covers the M4 from J16 – Membury Services eastbound and J15 – J17 westbound, as well as the A419 (towards Cirencester) and the A346 (towards Marlborough).

Salisbury provides essential cover to the highly dangerous A303.

Similarly, Trowbridge cover the major trunk roads of the A350 from Melksham to beyond Warminster and the A36 running into, and providing assistance to Somerset in the Frome area.



Chippenham's ESU picks up the cover on the A350 from Trowbridge as it goes beyond Melksham, and also covers the M4 J17-18 westbound and J17-16 eastbound and the A429 towards and beyond Malmesbury.

All of the afore mentioned are high density, major trunk roads within our county, that carry huge numbers of cars, HGV's and LGV's every day, day in, day out. The ESU's have been positioned where they currently are in order to mitigate this serious risk.

ESU's and their highly trained crews are valuable at almost all RTC's and especially those where extrication is difficult and protracted, and also where large vehicles are involved. This is because they carry larger, heavier grade cutting equipment and also high access platforms.

They are equipped with medical equipment that frontline pumping appliances do not carry – spinal boards (on which casualties suspected of suffering spinal injuries are placed), vacuum splints to immobilize broken limbs and a 'Kendrick Extrication Device' which again provides invaluable support to the back and neck when injury to these areas are suspected.

Needless to say that in the vast majority of RTC's injuries to the back and neck are suspected.

## Crewing/Training

WFRS propose to place the one replacement vehicle, a 'Heavy Rescue Unit' (HRV) at Trowbridge.

As with the aerial appliance, the Service plans to crew the appliance with the Retained staff from the station, not the on duty Wholetime personnel.

In real terms this means that when the vehicle is mobilized, the duty crew will remain on station and await the Retained crew to 'turn in' from their places of work or homes.

Common sense would make anybody wonder why the Service would want to delay turnout and therefore attendance at an incident even further, especially when considering the massively increased travel times that will be involved due there being only one HRV.

As well as turnout times, the policy of having Retained personnel being the only ones trained on the vehicle

would mean that the FRS has Wholetime crews on Wholetime salaries, working Wholetime hours having a lower operational skill base than their Retained colleagues who have just 2 hours a week to train and maintain competencies on not just one vehicle, as the Wholetime crews would, but two vehicles.

## Summary

ESU's if used and mobilized in a fit and proper manner, provide vital, even crucial lifesaving and life changing pieces of equipment, and equally the personnel within the Service who have crewed these appliances for years, carry with them experience and knowledge developed from attending countless incidents.

It is the Fire Brigades Unions opinion that to throw all that away could have a potentially serious effect on road safety in Wiltshire and will compromise our specialist rescue capability.

## Water Rescue

In tandem with Rope Rescue, WFRS has steadily built a strong foundation for water rescue, to ensure crews can respond quickly and safely to incidents in or near water.

The Fire Brigades Union considers both the direct proposal to reduce the number of Water Rescue Teams and the indirect results should the proposed alternative duty systems be realised to be incomprehensible, and furthermore, to the contrary of the Services' own strategic plan.

WFRS do not have a statutory duty to respond to water rescue incidents; however, as with many other disciplines there is a public expectation that we will make a sufficient response to ensure a successful resolution. Our acceptance of this expectation is evident in the provision of training and equipment that has increased over the last 6 years.

Spending on flood defences has seen significant reductions in recent years; the current financial climate will see this trend continue. If this is considered in conjunction with a predicted increase in extreme weather conditions it is safe to assume that the requirement for our response to weather related incidents will continue to increase.

In order to meet these expectations any response must be quick and include the appropriate resources and it is essential that our mobilisation includes the correct equipment and personnel trained to a suitable level.

Wiltshire Fire and Rescue Service is considered the primary rescue organisation in the area; this is recorded in Local Resilience Documents.

Water Rescue and extreme weather response are specifically mentioned in the current Strategic Plan;

Preparing for major emergencies including extreme weather;

'We will work with our partners to make sure we have the right resources and plans to handle any future incidents as well as we can. We will do this through the Local Resilience Forum, where we work with other organisations to plan for major emergencies such as flooding, pandemic flu and terrorist attacks that have enormous impacts on our community.'

What will we deliver?

'We will particularly look to make sure we can improve our response if there are extreme weather conditions'.

(Extracts from Strategic Plan 2010 -2013, page 28.)

### **Current Water Rescue Capability**

4 on duty teams; Stratton, Chippenham, Amesbury and Trowbridge.

If all are available this enables the Service to facilitate an effective response to 2 simultaneous water rescue incidents involving swift water. A swift water incident requires 2 teams to attend (SOP 032,3.0).

3 on call teams (from RDS stations); Malmesbury, Ramsbury and Tisbury.

These teams are able to provide a limited rescue capability using bank based techniques or entry into non-swift water incidents, depth of water that can be entered is dependent on flow but no more than between knee and mid thigh. They also provide a support capability for the 4 Water Rescue Teams.

### **Proposed Water Rescue Capability**

3 on duty teams; Stratton, Chippenham and Amesbury, removing the capability from Trowbridge.



If all are available this enables the Service to facilitate 1 water rescue incident involving swift water (SOP 032, 3.0).

The information above details a reduction in the number of water rescue teams by **25%** but when considered alongside the proposed change of duty systems, in real terms there will be an actual reduction in response by **50%**, due to the reduction of off duty personnel available for recall to duty during prolonged operations, as was the case during the 2007 Gloucester floods.

### **Risk Profile of Wiltshire West**

A high concentration of water risks including 20 miles of canal'.

'The area has experienced significant flooding along the river Avon'.

(Extracts from Strategic Plan 2010-2013, page 13.)

The proposal suggests that replacing the Water Rescue team from Trowbridge and replacing it with a First Responder team at Bradford on Avon would 'greatly improve the Service's response times and resilience in these areas'.

This is not the case; the attendance time of a Water Rescue team to an area known for flooding (see above extracts from Strategic Plan) would be significantly extended. The attendance time for a First Responder Team may be reduced but with their very limited capability there is a high probability that they would be exposed to significant moral pressure to work beyond the extent of their training and capability of their equipment.

Flooding incidents in this area include fast unpredictable flows in water with depths out of the range of the First Responder Teams.



The extensive canal risk should also be considered as beyond the capability of the First Responder teams due to its depth.

We currently facilitate an appropriate full water rescue response to this area.

### Summary

WFRS is expected, by both the public and external agencies to provide the role of water rescue, and therefore when responding to such incidents must do so effectively and to the best of its ability.

As with rope rescue, the financial implication is negligible, and so to make the changes proposed appears to be a 'change for change sake'.

In the summary of the report in response to the program for change, the lead officer for water rescue states that the "current full Water Rescue provision within the Service should be considered a minimum level" and recommends to "maintain the current water rescue teams in their present location". Going even further the lead officer suggests that "consideration should be given to upgrading the Trowbridge team to a powered boat capability".

The Fire Brigades Union cannot allow the safety of Firefighters and the public to be compromised either for the sake of change, or for a nominal financial saving.

### Rope Rescue

Forming part of WFRS proposals on the special appliance review, the reduction of the safe working at height (SWAH)/Technical Rope Rescue (TRR) teams from two to one is one of the more inexplicable.

Together with water rescue, WFRS has built up, over many years, a strong capability and resilience factor to ensure the safety of Firefighters when dealing with incidents that have a high potential for catastrophic injury.

Current working practices and the introduction of new Service Orders have recognised the need for the Service to make certain that legislation is adhered to and best practices observed.

The Fire Brigades Union commends the Service for introducing such policies and for using Firefighters and Officers with an extremely deep knowledge of SWAH

and TRR, and the plethora of legislation that surrounds it, to provide the evidence for and the subsequent introduction of the new orders.

### The Current Position

At present, all WT crews at Trowbridge and Chippenham (max. 32 Firefighters) are trained to highest level of TRR, with 8 of those personnel trained as instructors/supervisors.

Each station has a Mercedes Sprinters van equipped with both the rope and water response 'tools'.

The advanced skill levels within the team allow the Service to comfortably mobilise to a diverse range of incidents where a member of public is not easily evacuated such as a person trapped down a well, a worker injured or taken ill on scaffolding or on a church steeple, or at road traffic collisions down embankments to name but a few.

The SWAH element, with regard to legislation, is perhaps even more important. At thatch fires, roof fires, when crews are needed to work near an edge, the SWAH teams provide crucial advice to ensure safe systems of work are put in place in the early stages of an incident to primarily maintain Firefighter safety



throughout, whilst ensuring the Service maintains its' responsibilities to Health and Safety law 1 – See Notes (P26)

It is against these pieces of legislation that the current working at height strategy, including technical rope rescue, has been developed and implemented within the Service. It is also important to view the provision of technical rope rescue as a part of the overall SWAH package and not as a separate function.

## Resilience

The plan to reduce the Services' rope capability provides zero resilience. When Chippenham crews are at another incident (in their pumping appliance) the county will be without an emergency response for a working at height incident.

If neither of the rope supervisors are available through leave or sickness the Service will once again have no WAH capability 1 – See Notes (P26)

At present, with the crews at Chippenham and Trowbridge working in tandem, these occasions are extremely rare. Should the current provision be reduced by half, they would be the norm.

In the summary of the report in response to the program for change, the lead officer for SWAH/TRR strongly recommends the maintenance of the current provision, even suggesting that it should be viewed as the "minimum safe standard" and further suggesting that "An enhancement in skills is made at Salisbury (not to Level 3 but above Level 2) to resolve an issue with response times in this area. This would also provide additional resilience for the Level 3 teams if a ½ team is already deployed".

When considering the implications of reducing the SWAH/TRR capacity, it is essential to keep in mind that WFRS also propose to cut the provision of aerial appliances from 2 to 1.

Together with the rope stations, aerial appliances form the 'safety net' for SWAH incidents for Firefighters and the public. Cuts to both of these will leave times when Wiltshire is at best struggling to respond to incidents at height, at worse placing its staff in extremely hazardous situations, disregarding the legislation which has mandatorily brought the Service to its current position in the first place.

## Cost Implication

Over recent years efficiency savings have already been made.

Crews used to incur overtime payments for off station training. These were discontinued and instead the Retained staff at Chippenham and Trowbridge provides primary (albeit on call) fire cover whilst the SWAH/TRR teams train off site, resulting in a zero cost implication.

The (Mercedes Sprinter) response vehicles are owned by the Service and so no financial saving will arise from 'losing' one.

The annual cost for maintaining current practice is, according the lead officers report, c. £5420.

As the costs are the same at the two stations, a straight-line calculation can be made; the Service will save c. £2710.

## Summary

The Fire Brigades Union agrees whole-heartedly with the project leads assessment that the "current provision... should be viewed as a minimum safe standard".

To place in jeopardy the safety of Firefighters and the public, the Services' responsibility under health and safety legislation to provide a 'safe place of work' and 'safe person', and also its' reputation as the 'go-to' Service for working at height incidents to save £2710 is incredulous.

## Notes

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<sup>1</sup> Due to the extreme hazardous nature of SWAH/TRR, a supervisor must always be overseeing and directing operations

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<sup>i</sup> Working at height regulations 2004-amended 2007 (The Reg's) relates to Planning and Preparation for all work at height, including emergencies and rescues (Article 4(2) relates to the rescue of employees not members of the public.

Article 5 relates to competence and Articles 7 and 8 relate to the selection of correct and appropriate equipment to undertake work at height.

Fire and Rescue Services' are not exempt from any of the requirements of The Reg's except Article 4.4, which allows work in adverse weather.

The Health and Safety at Work act 1974 (HSAWA) and common\* law sets out an employers common law duties as the provision and maintenance of:

- A safe place of work
- Safe appliances and equipment
- Safe systems of work
- Competent and safety conscious personnel

Additional guidance has been given by the Health and Safety Executive that allows Services' to suspend The Reg's during the 'emergency phase' of an incident (subject to a suitable assessment of risk). However, once that stage has passed all regulations apply and will be enforced.

\*Wilson's and Clyde Coal Co. Ltd is a notable precedent



# Appendix 1

Wiltshire FRS has set out its equality objectives for 2012-2016. These objectives are available on its website.

This sets out both the General and the Specific duties upon Wiltshire FRA, as a public body and the FRAs plans to achieve compliance.

This appendix deals with the effect of proposed shift timings and the Day Crewed Plus (DC+) on women. This appendix takes the views of women in the FRS not just Wiltshire but also nationally via the Fire Brigades Union National Women's Committee (NWC).

Contained within the WFRS Equality Objectives is the following:

Objective 5: Workforce

"...Actions will be developed under this objective to ensure that equality and fairness are at the centre of our recruitment and promotion processes to ensure there are no barriers to those who identify with a particular protected characteristic"

With this objective in mind and based on the negative impact which women in Wiltshire say the FRS proposals on DC+ and 12 hour shifts will bring we submit the following appendix to support the core FBU submission.

Using WFRS own statistics, as set down in Equality and Diversity Data 2011/12 on the WFRS website, there are 119 women working across the organisation in both uniformed and corporate roles. Of these 119 women, 44 are in uniformed roles (Wholetime Firefighter, RDS Firefighter, Control Room Staff, Day Duty and Officers).

Clearly there is a huge disparity between the number of men and women in frontline roles. The removal of equality "targets" by the Coalition Government has given the signal that equality issues are no longer a priority for FRAs across England.

Despite this, there is still a legal and moral responsibility for FRAs to assess and mitigate potential barriers for women to enter and maintain FRS employment. The proposals put forward on both 12 hour shifts and DC+ will be a significant barrier to women joining and remaining in WFRS.

Currently the combination of working the 2 days shifts followed by 2 night shifts followed by 3 days free from duty, with working hours of 0900-1800 and 1800-0900, allows for significant pre planning of work alongside out of work activities. Women are still the predominate carers within families and the current system allows for a balance of work/caring responsibilities. If the Service were to introduce a 12 hour shift, with travelling to and from work then the "working day" would be extended to 14 hours per shift 4 days per week. Even if affordable private

childcare provision could be found, the effect upon children of extended childcare is unclear. It is patently unfair for children to be placed in extended childcare.

The following extract is from a report from 2003 from the FBU National Women's Committee.

*"...Having conducted a survey of FBU Members from London to Tayside the National Women's Committee can conclude that contrary to arguments made in Bain the current 2/2/3 shift system is far from a blockage to equality, diversity and the recruitment and retention of women and by asking members who have a family, childcare or caring commitments we would argue that the 2/2/3 shift system is conducive, if not promotional, to a good family life.*

*Parents/carers currently working this shift system say that it enables them to fulfill two roles:*

- 1) *Taking care of the family and*
- 2) *Concentrating on a full and active career within the fire service.*

*The current shift system allows parents to regularly be with their children and/or families for unbroken, meaningful periods of time, inclusive of weekends and weekdays. In addition, the current shift pattern means that they know well in advance, when they are working. This type of stability is an important factor when organizing and planning childcare, and balancing the needs of the family."*

Using the latest figures available: "Wiltshire County Council Childcare Assessment Report 2011" (this report excludes Swindon) only 10% of registered childcare providers open before 0800hours AND finish later than 1800hours. This drops to 3% in the South West Wiltshire and Marlborough areas.

It must be noted that there is no 24 hour child care provision.

However working as a firefighter is not confined to school term times and the number of holiday club places available in this area is only 5% of the total population of 5-14 year olds.

The potential difficulties for parents of children with additional needs are easily assessed with the number of providers of childcare dropping dramatically.

The average cost of childminding in Wiltshire in 2010 was £3.66 per hour. The average cost for full day care nurseries was £3.91. The cost therefore for child care for covering the day shift only for one month would be £409.92. Basing this on 13 hours of child care provision, if this could be found.

This cost does not include night time provision.

***To conclude, the introduction of 12 hour shifts and day crew plus would be a significant barrier to women joining the FRS and a huge problem for WT firefighters, particularly women firefighters and may see some unable to continue their careers within WFRS.***



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