

FBU response to the DCLG- commissioned
report:

*Facing the future: findings from the review
of efficiencies and operations in fire and
rescue authorities in England*

Fire Brigades Union memorandum to the Communities and Local
Government Select Committee



June 2013

A. About the FBU

A.1 The Fire Brigades Union represents over 41,000 firefighters across the UK many of whom hold contracts which fill more than one post. Accordingly we represent over 90% of the uniformed workforce within the UK including almost all personnel whether retained or whole-time firefighters and the vast majority of control room personnel and officers.

B. This submission

B.1 The Review brings together a number of themes and ideas which have been circulated within the sector for some years. It appears to mirror, yet not accredit, the Audit Commission's¹ narrow and spurious approach of measuring productivity (ratio of input: output), rather than the outcomes method required of an IRMP. The Review is eclectic, largely un-evidenced and with little support in the sector. The FBU contends that the Review should, at best, be viewed as a starting point for discussion and not be considered as conclusive nor a blueprint for the future fire and rescue service.

B.2 Sir Ken himself states within the foreword to his report *"I do not pretend to have all the answers, nor have I made specific recommendations."*

B.3 The Committee is invited to consider a number of publications and previous submissions to the Committee and to various government consultations which expand on many of the points made here including our most recent submission to the Spending Review 2013.

B.4 Due to the understandable limitation on the length of submissions, there are number of matters raised in the report which have not been commented upon within this submission. We have sent a number of our publications to accompany this submission.² The FBU will gladly provide specific supplements to this memorandum if that is helpful.

B.5 We have followed the chapter headings within the report.

1. Efficiency

1.1 'Anonymity' of the data regarding fire service statistics in the report makes evaluation extremely difficult.

1.2 The statistics provided do show a reduction in the numbers of calls and attendances. In that sense they do show a remarkable improvement in the productivity of firefighters in preventing and dealing with incidents.

1.3 However the statistics and their interpretation must be treated with some caution. The statistics aren't entirely robust. For example, the statistics regarding flooding are flawed. The trend in the incidence and attendance at floods is upward, yet the Review suggests an 8% reduction. The latest figures for England show that firefighters attended 17,900 flood incidents between April 2012 and March 2013, an increase of 50% on the previous year.³

¹ Audit Commission, Local savings review guide: Improving fire and rescue authority efficiency, November 2011

² For example the FBU reports, Facing Reality: for a fully-funded fire and rescue service; It's about time- why response times matter; Falling to the lowest common denominator; In the line of duty: firefighters deaths in the UK since 1978.

³ DCLG, Fire Statistics Monitor: England April 2012 To March 2013 (26 June 2013)

- 1.4 Although the incidence of fire has reduced, there a number of factors that base statistics do not account for:
- a. The effect on the development of and losses from fire of:
 - reduced numbers of firefighters attending longer response times.
 - b. The impact of:
 - changes in response on the length of time to tackle the fire
 - changes on containing the spread of fire.
- 1.5 The Review also mentions that overall attendance is down 40%. This reduction does not identify that the individual fire and rescue services have reduced the level of service to the public by not attending some calls, where a response was previously sent, for example
- Some automatic fire alarm signals are not attended
 - Some special services such as ‘person locked out’ are not attended, especially where the member of the public does not wish to pay.
- This represents a reduced and poorer service to the public and to businesses. There is no analysis of the scale or the impact of these changes to public satisfaction or to risk from fire.
- 1.6 Improvements in building regulations and regulations such as those for foam-filled furniture, alongside improved protection and prevention standards and activity have had a welcome effect in reducing the number of fires and the number of fire-deaths. The FBU was instrumental in campaigning for these reforms. However, we believe that the beneficial effects have probably reached a plateau.
- 1.7 In 2012/13 in England **provisional** data shows that 271 people dies in fires, of which 168 resulted from accidental fires in the home⁴. There has been no impact assessment carried out on any effect the proposed changes may have on numbers and trends in respect of fire deaths.
- 1.8 Moreover, there is no analysis of the impact of the suggested changes on the rescues carried out by fire and rescue services. For example over 5,000 people were rescued from fire in England in 2009-10, an increase on the last published figures which state that there were 3,816 rescues in 1999.⁵
- 1.9 The Review contains no impact assessment that the suggested changes will have on response times. In November 2010, the then fire minister told Parliament that for the period April 2009 to March 2010, England’s dwelling fire average response time was 7.3 minutes.⁶ This compares adversely with 6.5 minutes in 2006 and 5.5 minutes in 1996.⁷ This means that the average response time in England is now almost two minutes slower than it was a decade or so ago.
- 1.10 In a 2009 report, DCLG attributed the slowing of response times to increased traffic levels.⁸ However DCLG’s 2012⁹ report reveals that traffic levels peaked in 2007 but attendance times

⁴ DCLG, Fire statistics monitor April 2012 to March 2013, June 2012

⁵ FBU freedom of information requests 2010; Home Office, Fire Statistics UK 1999, Table 13

⁶ *Hansard*, 10 November 2010: Column 354W

⁷ DCLG, *Review of Fire and Rescue Service response times – Fire Research Series 1/2009*

<http://www.communities.gov.uk/documents/fire/pdf/frsresponsetimes.pdf>

⁸ DCLG, *Review of Fire and Rescue Service response times – Fire Research Series 1/2009*

⁹ DCLG, Fire incidents response times: England 2011 to 2012, 4 July 2012

<https://www.gov.uk/government/publications/fire-incidents-response-times-england-2011-to-2012>

continued to increase. It is our belief that this backs up the view of the FBU that other factors such as fewer firefighters, fire stations and appliances have caused attendance times to increase.

- 1.11 There are other concerns. Response times should be measured using the time the call is made to the arrival of the first appliance. Some fire and rescue services have begun using the time of *mobilisation*. It is not clear whether some fire and rescue services are reporting the use of Targeted Response Vehicles (TRVs) and other smaller vehicles, which might arrive swiftly but can only deal with relatively minor incidents.
- 1.12 Unlike the previous requirements of the National Standards of Fire Cover, the current figures do not record the arrival of second appliance which are required for intervention in building fires. The single average figure also masks wide variation in response times.
- 1.13 The Review states that "*firefighters themselves are much safer today*". Whilst that may be true when it comes to trips, slips and falls, it masks the fact that the increase in firefighter deaths in the workplace and on the incident ground in the last decade compared to the previous is anything but a good news story (see the FBU's *In the line of duty* report).
- 1.14 The Review promises that it would assess "*how risks would change over time*." It does so partially, but the risk to the public from fire and other 'traditional' fire service activity response-areas still remains.
- 1.15 Over the last decade the service has increased its role and function significantly. Only since 2008 have national risks been assessed and drawn together in the National Risks Register. Since the advent of the Civil Contingencies Act, fire and rescue authorities have responsibilities to involve themselves in Local Resilience Forums and to create and update the Local Risk Register for their area. Fire and rescue services are required to address the risks and to account for their operational response arrangements within their IRMP.
- 1.16 There is no evidence of any fire and rescue services carrying out their requirements to assess, and report their planning assumptions. The Review makes no comment on this matter and makes no impact assessment of the ability of fire and rescue services to meet their response requirements.
- 1.17 The wider economic cost of fires is immense. In a 2006 report¹⁰, CLG estimated that the total cost was £7.03bn, equivalent to approximately 0.78% of the gross value added of the economy. Some £2.77bn of the costs were incurred in anticipation of fire; the cost of the fire and rescue service responding to fires was estimated at £1.74bn, with the remaining £2.52bn attributable to the consequences of fire.
- 1.18 The FBU believes these 2004 figures underestimated the true cost of fire and are outdated now. Though DCLG has not updated the figures, the FBU is currently working with other fire service professionals to rectify this. Nevertheless, as a basic cost-benefit analysis, they clearly indicate the value of the fire and rescue service to the economy. A 2009 ABI publication stated that fire claims in 2008 were £1.3 bn (£3.6 million/day – 17% increase on 2007).^{11 12}

¹⁰ ODPM, The Economic Cost of Fire for 2004, 2006

¹¹ Association of British Insurers, (Press Release) *Record rise in the costs of fire damage*, December 2009

¹² Association of British Insurers, *Tackling Fire: A call for action*, December 2009

<http://www.masonryfirst.com/pdf/Tackling%20Fire%20A%20call%20for%20Action-1261.pdf>

- 1.19 The Review makes no attempt to quantify fire losses or to impact-assess the effects that the suggested changes would have.
- 2. Deploying resources**
- 2.1 The Review states that *“those areas taking the most decisive steps towards efficiencies are those with the clearest separation of responsibilities between the operational arm... and the decisions taken by the political arm”*. There is no indication within the Review as to where these areas are, nor, more importantly how policy decisions on funding, staffing can be separated from (i.e. not impact upon) operational decision making.
- 2.2 The Review identifies that the ‘front line’ extends beyond station-based personnel. The FBU agrees. We are concerned therefore that the Review does not highlight the deep cuts across all the fire service departments and posts which it lists on page 26 in addition to the thousands of station-based posts. These have occurred over the last decade and thousands more are being planned for.
- 2.3 We applaud the Review for identifying the detrimental effects of PFI, albeit 20 years after PFI’s inception. The Review avoids comment on the failure of privatisation in the fire and rescue service for example, an analysis of the Assetco episode.
- 2.4 Such an analysis, alongside a synopsis of the FiReControl debacle¹³, would have provided a salient reminder of the risks and costs associated with ‘cure-alls’ and ‘quick-fixes’ when private firms are brought in.
- 2.5 The Review gives space for anecdotal attacks on the Grey Book claiming that it *“stands as either a perceived or actual barrier to change”* and suggesting that it be reviewed. He also adds that *“it is now appropriate to remove the national role maps from the Grey Book”*. The Review fails to mention that national role maps (which accommodate themselves to job descriptions for each and every post within each fire and rescue services). These role maps arose as a consequence of firefighter fatalities and the subsequent HSE improvement notices, which addressed failings recognised within the sector and probably all fire brigades.
- 2.6 The Review gives examples of change but provides but no impact assessment on outcomes. There is no evidence to support that statement that changed crewing arrangements equate to providing *“more effective crewing”*.
- 2.7 The Review has ignored significant accident investigation findings carried out within the service on recent firefighter fatalities, as well as coroners’ inquests into fire deaths. Similarly the Review has not considered the failings identified in the HSE consolidated inspection report of fire and rescue services.¹⁴ One common feature in all these reports is problems with command and control at incidents, which has a direct correlation with the number of officers employed and available to attend incidents. This is a matter that would be adversely affected by the suggestions within the Review document.
- 2.8 The Review suggests that it is time for fire and rescue authorities to *“make best use of on-call staff”*. It is a misnomer to regard them as ‘on-call’, since this implies a permanent and continuous availability that simply does not exist. Retained firefighters do an outstanding job

¹³ Public Accounts Committee, The Failure of the FiReControl Project, HC 1397, 20 September 2011
<http://www.publications.parliament.uk/pa/cm201012/cmselect/cmpubacc/1397/1397.pdf>

¹⁴ HSE, The Management of Health and Safety in the GB fire and rescue service- Consolidated report on the inspections completed by HSE in 2009/10, October 2010
<http://www.hse.gov.uk/services/fire/management.pdf>

in providing fire cover for communities throughout the UK. However replacing wholetime posts with retained firefighters is not a solution.

2.9 Some key points:

- response times for retained crews are generally significantly slower than for wholetime crews because retained firefighters are mobilised and must travel from homes or their places of main employment.
- recruitment of retained firefighters is problematic, partly related to the fact that in most cases, firefighting is a second job for retained firefighters and they have other employment and domestic commitments.

2.10 There is a wealth of evidence based on professional and personnel- based surveys which identify the problems in recruitment and retention of retained personnel. Before suggesting that a reduction of wholetime firefighters take place, the Review should have availed itself of the evidence of the current shortages of retained personnel compared to wholetime personnel and how many 'retained' appliances are 'off the run' across the country.

3. **Collaborating**

3.1 Whilst the Review echoes calls for collaboration and sharing of services, no assessment has been made regarding the impact of the loss of independence and the ability to be self-reliant. In short, the Review makes an unsubstantiated assumption that increased collaboration (dependency) results in better efficiency and makes no assessment of the impact on effectiveness.

3.2 The Review advocates exploring *"a more national model, through enforced mergers... or potentially a full merger in the style of Scotland"*.

3.3 No costed proposals with a full business case is evident. The union judges mergers on their merits – we have opposed badly-thought through and ad-hoc merger proposals, but supported the merger in Scotland because guarantees were given by the Scottish government on protecting the public through maintaining and improving current levels of fire cover, the development of central standards, inspection and governance arrangements.

3.4 In the English context, we note that the Review avoids mention of whether there is any public appetite for merging their fire and rescue service. In a similar vein, there is no evidence at all for public demand or appetite for shared control rooms.

3.5 We support initiatives to reduce costs through joint procurement, commissioning and evaluation of products for fire service use. The Review provides no analysis of the demise of the Firebuy project. Similarly we support the Review's call for central guidance. We are disappointed to note that all these things were once achieved in a robust manner through the now-disbanded CFBAC. The service lost a valuable resource in the form of common guidance and common product specifications (through the resultant JCDDs). Since that time there has been a plethora of ineffective and short-lived forums which do not come anywhere near matching the success of the CFBAC and its structures.

3.6 The Review advocates the *"merging of fire and rescue services with one or more of the other blue-light services."* We note that the government's own Fire Futures review two years ago ruled out the single governance model for emergency services.¹⁵

¹⁵ DCLG, Fire Futures Reports – Government response (page 29), 2011

- 3.7 Ambulance Trusts are already organised regionally (a geographic model which seems to find favour with the Review). It is bizarre that the Review suggests that the fire and rescue service would come within the umbrella of the ambulance trusts, given the poor standards that have been reported in some Trusts, notably East of England and East Midlands.
- 3.8 Alongside the opposition from the FBU to the proposal in Northamptonshire¹⁶ regarding the PCC overseeing the fire and rescue service, we note the lack of any public enthusiasm for the Police and Crime Commissioners evidenced by the ‘turnout’ at the polls in November 2012. Further, we note that no political party had this proposal within the manifesto at the general election 2010, nor did any candidate in the PCC elections. The matter is not contained within Police and Social Responsibility Act 2011 nor was it raised during the passage of the Bill.
- 3.9 On co-responding schemes, the union’s policy is clear: we are opposed to the imposition of co-responding schemes without consultation and without the necessary guarantees for our members and for the public. It is not in the interests of the public to displace the ambulance service, nor to believe that firefighters can provide a medical service on the cheap. The FBU has always been willing to discuss co-responding proposals with employers and ministers, as long as the parameters are clear.

4. Driving Efficiency

- 4.1 The Review boldly states that current *“funding formula is fair”* and then states *“in any system there are ‘winners and losers’...”*. The FBU finds it wholly unacceptable that the funding of the primary emergency and rescue service can in anyway be subject to the *“luck of the draw”*.
- 4.2 The Review questions the criteria for assessing societal risks as a basis for funding, criticises the variance between per capita spending but offers no alternatives for consideration or comment.
- 4.3 The Review refers to the issue of mutualisation, which is currently being explored by Cleveland senior managers and correctly warns that mutuals *“may not be a panacea for efficiency”* and that *“there is a significant risk of losing public and political trust in a highly respected public fire and rescue service without underpinning assurances in place”*.
- 4.4 The FBU and MPs have highlighted this threat of privatisation. We note that following the exposure of the plans earlier this year that Eric Pickles, the Secretary of State told the *Northern Echo* on 20 March: *“Let me be absolutely clear. We will make no move, directly or indirectly, that involves the privatisation of the fire service. It is not our intention, nor will we allow, private firms to run the fire service. If that means we cannot move on mutualisation, we will not move on mutualisation - if that means privatisation of the fire service. Have I left any room for manoeuvre?”*¹⁷
- 4.5 Despite the denial, the FBU does not believe that the threat of privatisation has gone away. CFA too has written to ministers to echo the FBU’s concerns that private providers would prioritise profit over safety and that privatisation would threaten national resilience.

¹⁶ Northampton Chronicle, Union concern over ‘blue light’ merger plans, 14 February 2013

<http://www.northamptonchron.co.uk/news/crime/union-concern-over-blue-light-merger-plans-1-4786841>

¹⁷ The Northern Echo, Pickles ready to abandon mutualisation of Cleveland Fire Brigade

http://www.thenorthernecho.co.uk/news/10299467.Eric_Pickles_pledges_to_halt_fire_service_privatisation/

4.6 If a fire and rescue service is mutualised, it will as a consequence of procurement regulations eventually be subject to open competition, which will expose that service to the prospect of privatisation. To bring to an end any speculation or doubt on the matter requires one simple act on behalf of the Secretary of State to declare in Parliament that he will use the powers in the Fire Services Act 2004 (or take steps to create the necessary powers) to prevent any fire and rescue service out-sourcing its fire and rescue service to any private company and/or any mutual or social enterprise body.

4.7 We have expressed on a number of occasions our grave concerns that there is no robust scrutiny or inspection of the fire and rescue service, as existed when there was an active HMI (and as in Scotland now). Such an inspection arrangement, which exists within most of the rest of the public sector in England, would ensure that government could be provided with up to date information and reflection based on first-hand recent experience and observation.

5. **Future for fire and rescue**

5.1 The future of the fire and rescue service is too important for the national interest to be decided without a thorough-going evaluation of the options through an evidenced-based process. The future direction of the service should also be subject to thorough consultation with the major stakeholders, particularly the FBU as the representative of firefighters.