

Shropshire Fire Brigades Union response to the consultation on
the
Initial Business Case considering the governance of
Shropshire Fire and Rescue Service
and
Hereford and Worcester Fire and Rescue Service
by the
West Mercia Police and Crime Commissioner

Contents

Introduction	2
Initial Business Case	3
Future of SFRS	6
Conclusion and Summary	12
References	14



Introduction

The Fire Brigades Union (FBU) is the democratic, professional voice of Firefighters and other workers within Fire and Rescue Services (FRS) across the UK. We represent the vast majority of wholetime (full-time) and retained (part-time, on-call) operational Firefighters and Emergency Fire Control staff across the UK.

The FBU opposed the Government's Policing and Crime Act which passed legislation allowing Police and Crime Commissioners (PCCs) to take over governance of Fire and Rescue Services. The union argued that there was no demand and no mandate for such a change.

PCCs were first elected in 2012 and again in May 2016 with dismal turnout both times from voters. In West Mercia, voter turnout was just 14.5% and 20.7% respectively, despite the elections last year coinciding with local council elections, which theoretically should have increased much greater participation. The FBU believe this reflects the lack of public awareness about the role PCCs play. Consequently, the demand for PCCs to govern fire services cannot be assumed to have any democratic legitimacy.

In responding to the PCC's Initial Business Case (IBC), this document gives our position first on the possible change of governance in the context of the recent direction of the Fire and Rescue Service. And secondly, in the event of SFRS governance falling under the PCC, our concerns for the future running of SFRS.



Initial Business Case

Capacity/Efficiency

The success of the PCC model of governance of police forces across the country remains unproven and to allow its expansion to fire seems hasty and ideologically driven. The Initial Business Case claims it will be able to achieve £4 million efficiency saving without affecting frontline posts or service delivery. Having experienced severe cuts since 2010, we are very sceptical of this claim.

There is little evidence that the introduction of PCC's has led to efficiency in governance of Police forces nor protected its front line officer numbers. In fact, there has been a 7% reduction in West Mercia since 2012. (160 warranted officers have been cut from West Mercia since the PCC assumed governance in 2012). West Mercia is currently 25th of 43 police forces in England and Wales for the number of officers per 100,000 population.¹

Indeed Shropshire Fire and Rescue Service's (SFRS) emergency operational response can in no way be regarded as extensive in comparison to most other Fire and Rescue Services (FRS). This has meant that use of resources in Shropshire has historically had to be extremely efficient and effective resulting in SFRS being consistently recognised as one of the most efficient FRSs in the UK. Despite that low base, SFRS has had to endure a swathe of cuts to its operational response, even though David Cameron had promised, at Carlisle Fire Station on the eve of the 2010 general election, that Austerity would not lead to frontline cuts.

SFRS has completed a cycle of Integrated Risk Management Planning (IRMP) from 2010 to 2015 under the project "Public Value" and is currently undertaking the second cycle of IRMP under the "20:20" project. Under Public Value, cuts amounted to a reduction of 52 operational posts⁴ broken down below:

- 40 Firefighter posts (20 Retained and 20 Wholetime)
- 5 Watch Managers
- 6 Station Managers and
- 1 Brigade Manager

The exact level of cuts introduced by 20:20 is of course subject to further review and intervention. However, one Area Manager post has already been deleted and changes to the wholetime duty system (WDS) is likely to reduce



the operational establishment by a further 12 Firefighter posts. This has meant that the Service has had to begin planning for circumstances where minimum crewing for the 5 immediately available fire engines may not be achieved.

We also know that Austerity cuts to Hereford and Worcester Fire and Rescue Service (HWFRS) has left it underfunded and therefore understaffed too. Therefore, claims within the IBC consultation that an estimated further £4 million can be cut is, at the very least, unrealistic. **It is certainly evident to us that all three services require investment. Investment to fulfil their minimum service delivery targets rather than further cuts.**

Governance

The most recent Home Affairs Select Committee report² into PCCs states: *“The introduction of PCCs has worked well to date and has had some beneficial effect on public accountability and clarity of leadership in policing. However, this reform is still relatively new and understanding its impacts is still a work in progress. Any expansion of the PCC role needs to be incremental and carefully judged.”*

This would lead us to believe that bypassing the representation model and moving straight to governance is a step too far, too soon and should be given much more serious consideration. With the Policing and Crime Act 2017 making collaboration a mandatory duty on Fire, Police and Emergency Ambulance Trusts, there is no artificial barrier which can be maintained by any party. The representation model, expanded to allow an appointed FRA member to sit on Police and Crime panels as a reciprocal arrangement, could deliver all of the proposed benefits of the governance model without any of the implementation risks. The FRA could also give consideration to reducing the costs of governance whilst maintaining democratic representation.

During the PCC election the public were given no indication of John Campion’s plan to take over fire governance in his official election literature.³

How can the PCC claim that he has any mandate for assuming governance?

No PCC was elected as Policing, Fire and Crime Commissioner (PFCC). **If the joint governance bid is successful, in order to achieve a genuine mandate John Campion should stand down and seek re-election as PFCC.** This would remove any suspicion that the merger was engineered as a power grab or



some kind of empire building exercise and give the new PFCC a full term in which to achieve the stated aims.

Consultation

The FBU are concerned that the consultation is taking place over a holiday period which could lead to less public engagement in the process. **We would like to see an extension of the deadline if the responses to the consultation are not representative of a wide cross section of West Mercia communities. We would also like to see the full publication of the responses and a breakdown of the statistics.**

The Single Employer Model

The FBU is very concerned that a single-employer model, with increasingly integrated police and fire services including combined senior management, common complaints and conduct systems, and joint support services, would seriously undermine the firefighting profession.

Stakeholders from both FRSs and Police forces have expressed concern that a single employer model does not serve their own organisations best interests or those of the wider public.

Although the FBU recognise that the IBC recommends the governance model, we have concerns that this is just a precursor to full integration.

The FBU need a firm commitment that you will not seek to introduce a single employer model.



Future of SFRS

Whilst the FBU maintains its position that the PCC governance model is not the right way forward for the fire and rescue service, we recognise the reality of the situation and the possible outcome of the consultation. On that basis we make the following points with regard to our main concerns for the future of SFRS

NJC role maps, terms and conditions

The National Joint Council for Local Authority Fire and Rescue Services (NJC) is the body responsible for agreeing the national framework of pay and conditions for wholetime and retained Firefighters and Fire Control staff. It consists of 28 members appointed by the representative bodies of the employers and employees and each side is free to bring proposals to negotiations.

The NJC has an excellent record of progressing vital industrial relations matters. This includes the pay award process; ongoing work on terms and conditions; a fitness agreement; implementing the part-time workers settlement agreement; amending the Grey Book sections concerned with maternity, childcare and dependency; and the Grey Book sections relevant to health, safety and welfare.

The NJC has also been working on five significant work streams to transform and bring genuine improvement to the fire and rescue service:

- Environmental challenges flooding, inland water safety, snow, wild fire
- Emergency medical response: co-responding, falls, on-site trauma care, provision of community training
- Multi agency emergency response (MTFA): joint working, any issues falling out of JESIP
- Youth and other social engagement work: arson reduction, working with risk of offending youth groups
- Inspections and enforcement: schools, illegal homes, crown properties, expansion of unregulated business use, related fire safety advice.

Developing these work streams through the NJC will undoubtedly improve the service to the public whilst progressing Firefighters' conditions of service. This



is a 'win-win' programme of change, underlining the virtues of a national system of employment relations.

National bargaining provides stability, is cost-effective, strategic and efficient providing both the necessary competence and capacity that cannot be reproduced locally. Our members also value the national arrangements for negotiating their pay with five out of six (87%) indicating they were in favour of a national pay structure in a recent YouGov survey of Firefighters organised by the FBU.

It also makes strategic sense given that the demands on and operations of the service are not limited by administrative boundaries. Firefighters cross borders on emergency calls every single day and carry out work in areas covered by other FRSs. Major incidents requiring large number of Firefighters from many services are a regular occurrence. In these circumstances, national bargaining arrangements through the NJC provide a mechanism for addressing terms and conditions issues for sound organisational and operational reasons. They reduce costs by avoiding unnecessary duplication and ensure that Firefighters facing the same risks at incidents conform broadly the same conditions of service.

The FBU seek a firm commitment that, in the event of a transfer of governance, our members will continue to be employed on NJC terms and conditions and role maps, the PFCC will seek representation at NJC level and representative bodies will be afforded a seat on the PFCCP.

Non-warranted policing activities

Firefighters are dedicated professionals who provide an independent, humanitarian service. Operational and organisational independence from the police is a red line.

While the Policing and Crime Act maintains the ban on serving police officers working as firefighters, many PCCs have been eager to emphasise that there is scope for firefighters to undertake non-warranted police activities; work with vulnerable people, particularly around issues relating to mental health take a substantial amount of police time. In some parts of the country, firefighters are exploring police community support officer (PCSO) work.

The FBU seek a firm commitment that you will maintain firefighters' operational independence from the police, and that firefighters will not be compelled to undertake police community support officer (PCSO) work.



Establishment, crewing, pumps and stations

Since 2010, the government has reduced central funding for Fire and Rescue Authorities (FRA) in England by over 30%. As a result, over 11,000 frontline Firefighters have been lost, 40 stations have closed and scores of appliances have been removed.

Fire and Rescue Services have downgraded their fire cover through the introduction of day crewing/plus and reduced night cover, lowering establishment and minimum staffing levels and replacing second pumps with targeted response vehicles, all of this has, and continues, to diminish the service to the public. As a result, emergency response times are at their slowest for twenty years.

How quickly firefighters arrive at the scene and how many resources are available can be the difference between life and death. It is imperative that Fire and Rescue Services are properly funded, with resources determined by risk, not cost. Financial savings must not come before public safety.

Our document “Interim Review of Shropshire Fire and Rescue Service Public Value 2012,” outlined an evidenced minimum operational establishment in all departments for SFRS. The evidence and approach used to produce that document reflects the true methodology that should be used by FRSs to produce their IRMPs. And so, our position remains that SFRS should employ staff to the figures we produced in that report to maintain a minimum service delivery to Shropshire’s public.

The FBU seek a firm commitment that you will maintain Shropshire Fire and Rescue Services’ current establishment as a minimum initial requirement. This level is already inadequate and we seek a commitment to staff to the levels outlined in our “Interim Review of Shropshire Fire and Rescue Service Public Value 2012.” This is required to ensure local and national resilience to fire and other emergencies.

Efficiency savings

The Government’s Austerity agenda has meant Police forces facing similar unprecedented budget cuts. The FBU is concerned that under a shared governance model, FRS resources could be used to prop up ailing Police forces. Although the legislation ensures Police and Fire will continue to



receive separate funding, there is still room for budget flexibility on shared and joint costs.

Growing collaboration between each of the three services is becoming increasingly evident. The project to rebuild Telford Central Fire Station has investigated at length all opportunities for collaboration. The coordination between all services in planned and dynamic operational response has grown exponentially and communication lines are increasingly improving.

As stated previously, we believe in the need for investment not further cuts, but undoubtedly efficiency can always be found in an ever evolving environment. Closer collaboration has and will continue to take place. This can be done without a PCC governance takeover and therefore negate any discrepancies of funding between the three services.

The FBU seek a firm commitment that the cost of joint ventures will be apportioned fairly, reflecting the usage of each service, and that any efficiency savings achieved from the Fire and Rescue Service will be reinvested in fire and rescue front line staff and resources.

Privatisation/Mutualisation

The Fire and Rescue Service has witnessed creeping privatisation in many areas. Personnel, estates, training and frontline equipment including fire engines, have been handed over to the private firms seeking to make a profit. It is always claimed that this is a more 'efficient' way to operate but too often this proved not to be the case as epitomised by the scandalous FiReControl, PFI contracts and the disastrous experience with AssetCo in London.

We have also seen examples elsewhere of privatisations which have completely failed, forcing the state to step in with a public bail-out. The failure of Metronet on the London underground is just one such example.

These examples highlight how the privatisation of emergency services is a dangerous and flawed policy. Local communities cannot afford to rely on the commercial success or otherwise of a private firm to ensure that they have fire and rescue cover. The only sensible and safe policy for the fire and rescue service is for it to remain firmly in the public sector.



The FBU seek a firm commitment that Shropshire Fire and Rescue Service's frontline, operational personnel and resources will remain in the public sector.

Emergency Fire Control Rooms

Despite the Government's assurances that Police and Fire and Rescue Services will remain operationally distinct, several PCCs have mooted merging Police and Fire Controls and employing joint call handlers. The clear inferences in the IBC regarding SFRS's Fire Control represent our most immediate and urgent concern.

Firefighters in the Emergency Fire Control Room are uniformed personnel and are an integral component of the frontline in the Fire and Rescue Service. They are dedicated professionals with an in-depth specialist knowledge of fire command and control, trained to provide life preserving advice to members of the public trapped in burning buildings, and determine what resources to mobilise to fire and rescue incidents. Shropshire's Fire Control (more than any other) coordinates the entire Service in every aspect as a central logistics hub. The service that it provides cannot be replicated from a remote location outside the organisation.

Shropshire Control has only recently been the subject of a rigorous analysis under the 20:20 IRMP and its value to the service as a stand-alone control room should not be in doubt. The outcome of that analysis has provided a direction of travel for Shropshire's Fire Control to become an integral part of SFRS's operational intelligence in the Operations Dept. The value of this transition cannot be underestimated to secure Firefighter safety and the organisation's protection against litigation and reputational challenge.

Any suggestion that their role is now under the prospect of merger/transfer to another county or subsumed into some, as yet undescribed, joint police/fire organisation can only lead to greater stress on an already overloaded workforce and takes no account of resilience nor business continuity planning.

Business continuity planning dictated through the IRMP must recognise the correct balance between "dependency" and "duplication." Excessive duplication can clearly be seen as inefficient, but excessive dependency (in the case of Fire Control) can lead to catastrophic failure. Avon and Somerset Police control operations were severely curtailed recently, due merely to an



owl disrupting the power supply⁵. Plans for both Hereford and Worcester FRS and SRFS, to include the resilience that these essential departments provide, will require two provisions of the service that their Fire Control Rooms provide.

In terms of any integration with Police control, there are many further issues that need to be considered. Police control operators have a very different culture (non-uniformed) and call handling procedures with a separate role for call handlers and dispatchers.

The FBU seek a firm commitment that Shropshire Fire and Rescue Service control staff will continue to be employed on NJC terms and conditions, adhere to nationally negotiated role maps and that their position as a stand-alone Fire Control room in Shropshire is secure.

Use of Fire Service Premises

Aside from the savings in governance it appears that there is to be a radical review of the police estate in order to release capital and make greater use of Fire Service premises with the assumption that this is desirable and productive. We have grave concerns that a permanent police presence on fire stations may have an adverse effect on community use of those stations. Many community groups and charities which make use of the community facilities on fire stations work with the most vulnerable members of the community, asylum seekers from more authoritarian parts of the world for example, who may feel uncomfortable using a facility with an overt law enforcement presence.

Furthermore, we foresee a significant risk of reputational damage to the fire service if identified as an arm of law enforcement.

The FBU seek a commitment that community facilities and the neutrality of the fire service will not be compromised in the shared estate or in wider collaboration measures.



Conclusion

In responding to the PCC's IBC to takeover governance of SFRS there are two distinct areas which concern us. The FBU has a principled opposition to PCCs taking over governance of FRSs on the grounds that there is no public desire or mandate for such a takeover and also that the necessary and important distinction between the services require them to remain independent from each other. We also believe that the required collaboration and hence efficiency that can be exploited between the services can be achieved under the representation model. Under the representation model, the important issue of Fire Service neutrality and all that it gains us in community engagement will not be lost.

The second area of concern is around the future projection of service delivery for SFRS and the other two services. £4 million cuts is a real threat to the service provided to the Shropshire public. We have campaigned and worked to limit the Austerity cuts over the last seven years and find our service already barely functioning. Further cuts are not achievable. Had the IBC identified areas where real investment could be made to improve service in West Mercia, opposition to the IBC may not be so vociferous. Of course, either way (investment or cuts), the ability of the PCC to introduce change into the future better than the current governance model has not been convincingly made.

Summary of recommendations and position

- It is certainly evident to us that all three services require investment to fulfil their minimum service delivery targets rather than further cuts.
- If the joint governance bid is successful, in order to achieve a genuine mandate John Campion should stand down and seek re-election as PFCC.
- We would like to see an extension of the deadline if the responses to the consultation are not representative of a wide cross section of West Mercia communities. We would also like to see the full publication of the responses and a breakdown of the statistics.
- The FBU need a firm commitment that you will not seek to introduce a single employer model.
- The FBU seek a firm commitment that, in the event of a transfer of governance, our members will continue to be employed on NJC terms



and conditions and role maps, the PFCC will seek representation at NJC level and representative bodies will be afforded a seat on the PFCP.

- The FBU seek a firm commitment that you will maintain firefighters' operational independence from the police, and that firefighters will not be compelled to undertake police community support officer (PCSO) work.
- The FBU seek a firm commitment that you will maintain Shropshire Fire and Rescue Services' current establishment as a minimum initial requirement. This level is already inadequate and we seek a commitment to staff to the levels outlined in our "Interim Review of Shropshire Fire and Rescue Service Public Value 2012." This is required to ensure local and national resilience to fire and other emergencies.
- The FBU seek a firm commitment that the cost of joint ventures will be apportioned fairly, reflecting the usage of each service, and that any efficiency savings achieved from the Fire and Rescue Service will be reinvested in fire and rescue front line staff and resources.
- The FBU seek a firm commitment that Shropshire Fire and Rescue Service's frontline, operational personnel and resources will remain in the public sector.
- The FBU seek a firm commitment that Shropshire Fire and Rescue Service control staff will continue to be employed on NJC terms and conditions, adhere to nationally negotiated role maps and that their position as a stand-alone Fire Control room in Shropshire is secure.
- The FBU seek a commitment that community facilities and the neutrality of the fire service will not be compromised in the shared estate or in wider collaboration measures.



References

- 1 House of Commons Library Briefing Paper Number 00634, 14 June 2017 Police Service Strength
- 2 House of Commons Home Affairs Committee, Police and Crime Commissioners: here to stay, Seventh Report of Session 2015-16, March 2016
- 3 PCC Candidate Election Leaflets 2016 <https://www.choosemypcc.org.uk/area/west-mercia>
- 4 Appendix to report on Public Value Review Update Shropshire and Wrekin Fire and Rescue Authority 17 June 2015
- 5 <http://www.bbc.co.uk/news/uk-england-bristol-41072875>

