



**Hereford and Worcester Fire Brigades Union Response to the
Hereford and Worcester Fire and Rescue Service
Community Risk Management Plan 2025 – 2030**





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1. Foreword

The Fire Brigades Union represents by far the vast majority of Firefighters both nationally and locally, we are the professional voice of Firefighters and as such provide here our reasoned response to Hereford & Worcester Fire and Rescue Service's (HWFRS) Community Risk Management Plan (CRMP) (2025-2030) Consultation Document.

In our response we reference Integrated Risk Management Planning (IRMP) as well as specifically to Hereford & Worcester Fire and Rescue Authority (HWFRA) rather than to the Service. This is deliberate. It is important that the IRMP is owned by the Fire and Rescue Authority (FRA) because it will be (upon approval) their instruction to management how to lead and direct the service, in this case over the next five years. And so therefore we do specifically refer to HWFRA where direction and decision making is concerned and more specifically to HWFRS and its management where implementation and operations are concerned.

In terms of the draft CRMP, which includes 11 accompanying documents and makes reference to many other reports (such as the Grenfell Tower Inquiry Phase 1 report), and several resources, there appears to be little by way of specific change proposed. Much of its contents are a continuation of priorities and initiatives already identified or in place and indeed the consultation questions asked seek an opinion on whether or not HWFRS should review, and if necessary, develop its capabilities for a range of incident types and invest to better understand emerging technologies and processes. Much of this work has already begun and will no doubt continue regardless of the response to the public consultation. HWFRS has been through a considerable amount of change, recently implementing the Resource Review which resulted in an overall reduction of fire engines and Firefighters. The FBU consider the changes implemented through the Resource Review, outside of this CRMP and without consideration of the risks faced by the two counties, to be in direct conflict with the IRMP process and the National Fire Chief's Council (NFCC) CRMP Framework. The executive summary within the consultation document highlights many of the challenges that HWFRS will face over the coming period, however the ability for HWFRS to manage the increasing, changing and emerging risks with a new service structure is largely unknown and unexplored as there are no clear proposals detailing how the Service will adapt and evolve to meet the needs of the two counties of Herefordshire and Worcestershire.

In terms of the new period of CRMP, we make the same commitment to do all we can to ensure that the direction of HWFRS is best for all concerned. We look forward to working with both management and fire authority members to tackle the many challenges we will undoubtedly encounter during the period of this CRMP.

Neil Bevan | Brigade Secretary

David Benfield | Brigade Chair



2. Introduction

Whether the Integrated Risk Management Plan (IRMP) cycle evolution since its inception in 2004 has improved is a matter overdue for debate. In those early years, IRMPs were annual plans containing consultations of specific proposed changes. Now they cover longer periods and are vaguer, addressing wider-ranging aspirational ideas with a view to leaving options open for FRSs to refine proposals at a later date. One advantage this brings is the legroom for FRSs to adapt to unforeseen changes and other unknowns. The disadvantage though is the lack of definition, purpose and direction. In our view, the lengthening of the IRMP period is understandable, but their divergence from their original purpose undermines their ethos and *raison d'être*.

Clearly there must be a balance between proposals in IRMPs being specific but not pre-determined. An IRMP must identify, analyse and assess risk with a view to constructing plans to counter and manage that risk. Fire service business does generally evolve rather than dynamically change and therefore much of the IRMP will be re-confirming risks and actions already identified in earlier iterations and to a large extent then, already dealt with; or at least planned for. That does not mean though that the IRMP can be bereft of newly identified risk nor plans to mitigate those risks. This is not a criticism of Hereford & Worcester Fire and Rescue Service (HWFRS) in its CRMP; it is of the entire sector. Each iteration of IRMP in every service is guilty of travelling this path toward vagueness.

For HWFRS whose IRMP is called a Community Risk Management Plan (CRMP) there has been a great deal of effort employed in identifying and analysing existing risks and forecasting future, emerging and changing risks. However, despite this effort there is a lack of formulation of specific plans to deal with those risks. For HWFRS's current consultation, the previous period which was 2020 (subsequently extended till 2021) to 2025 needs to be fully reviewed. As part of the FBU response there were 28 recommendations – we have reflected on those recommendations in the main body of this report, however it is important to note that the majority of those recommendations have not been addressed by HWFRS. Within that period HWFRS have dealt with the 2022 wildfires, the recovery phase of the Covid 19 pandemic, and more locally, two large scale incidents in Kidderminster and wide area flooding that has continued to impact the two counties. Add into this continued central government funding cuts resulting in changes to fire cover arrangements, a bespoke consultation for a "Resource Review", and inspections undertaken by HMICFRS have all had significant impact on HWFRS. Further, the wider political situation with the economic fallout from Covid 19, the wars in Ukraine and Gaza and an uncertain future due to a shift to right-wing politics in several countries around the world, including the recent re-election of US President Donald Trump will all need greater depth of analysis and monitoring than that included in this CRMP.

In this, our response to the CRMP consultation, we will expand further on each of these areas and will also include our evidenced belief on what a fully funded fire and rescue service should look like in Hereford and Worcester.

We will of course look to work closely with HWFRS in the joint aim in providing the best FRS that we can, this after all is a high priority for our members.



3. Executive Summary

In recent years Grenfell, Covid 19, various terrorist attacks, wildfires and flooding have re-confirmed, now more than ever that the fire service is an incredibly adaptable, immediately responsive and effective emergency service. It has suffered chronic underfunding, but firefighting is a broadening vocation which saves lives and livelihoods to the great economic benefit of the country. It is a “go to” service whose effectiveness is being threatened by underfunding. This needs to change with renewed investment and better direction for the future of the fire service and the country it protects.

The rationale for funding is straightforward, but the need for greater national coordination and oversight is equally important, if less obvious. Capacity and resilience need to be improved through investment, but some functions have become derelict and require attention. The most obvious is the vacuum left by the crumbling Integrated Personal Development system (IPDS). In each of the areas we look at in this document, the conclusions reveal the need for an oversight body inclusive of all stakeholders. How this looks in structure should be determined by the sector, but the needs of each area are specific and require expertise.

HWFRS (as with all other FRs) has been decimated by cuts. A large part of our response here concentrates on the principle of IRMP, which evidences that HWFRS needs to increase its capacity. It needs more Firefighters to ensure availability of fire engines and special appliances across the two counties. HWFRS also needs more Firefighters to ensure their safety and effectiveness provided to the public by restoring adequate crewing, that is a minimum of five Firefighters on each and every fire engine.

To make a robust case for funding it is necessary to demonstrate the impact of fire service work and most particularly is emergency interventions. Measurements of emergency interventions have always centred around negative aspects such as numbers of fatalities and serious injuries, damage and destruction. These key performance indicators (KPI) are required, but more emphasis needs to be given to lives saved, rescues carried out and positive economic impact of saving property and livelihoods.

We examine in our document the future direction of the fire service, direct future risks and other indirect risks such as pay. There are however plenty of risks that can be planned for and these are accepted as rising in magnitude and therefore support our arguments and recommendations for greater investment and more Firefighters.

Notwithstanding all of the above, we take this opportunity to strongly recommend remedial action with regard to the fire cover. The more rural of the two counties suffers the compounded knock-on effect of cuts in Worcestershire’s fire cover because there is no longer the required depth of resources. We recommend to HWFRA that funding needs to be found urgently to re-instate the second immediately available 24/7 fire engine at Hereford and the third fire engines at Worcester and Hereford fire stations. Additionally, the money saved through the Resource Review must be used to implement the six wholtime posts at Leominster and Bromyard.



4. Review of Recommendations to 2021-2025 CRMP

Reflecting on the recommendations we made in our response to the 2021-2025 HWFRS CRMP consultation there are a number of outstanding points which we will highlight and reflect on below:

Recommendation 1: Commit to extending the current mental health support systems both in terms of capacity and longevity.

The impact of financial constraints to fire service funding that has resulted in harsh cuts to resources, pay and staffing levels, at the same time as an expansion of the work Firefighters undertake has led to a deterioration of mental health. This is reflected in the quarterly performance reports to the Fire Authority's Policy and Resources Committee during the current CRMP cycle, where the top three reasons for absence have increasingly included Mental Health:

Q1 2021-22	Other causes
	Musculoskeletal – Back
	Musculoskeletal – Lower Limb
Q2 2021-22	Musculoskeletal – Lower Limb
	Hospital/Post Operative
	Musculoskeletal – Shoulder
Q3 2021-22	Mental Health – Anxiety
	Respiratory – Cold/Cough/Influenza
	Hospital/Post Operative
Q4 2021-22	Hospital/Post Operative
	Respiratory – Cold/Cough/Influenza
	Mental Health – Anxiety
Q1 2022-23	Mental Health – Stress
	Respiratory – Cold/Cough/Influenza
	Musculoskeletal – Back
Q2 2022-23	Respiratory – Other
	Mental Health - Stress
	Respiratory – Cold/Cough/Influenza
Q3 2022-23	Respiratory – Other
	Respiratory – Cold/Cough/Influenza
	Hospital/Post Operative
Q4 2022-23	Respiratory – Cold/Cough/Influenza
	Respiratory – Other
	Gastro-Intestinal
Q1 2023-24	Mental Health - Stress
	Mental Health - Other
	Musculoskeletal – Lower Limb



Q2 2023-24	Respiratory – Cold/Cough/Influenza
	Gastro-Intestinal
	Mental Health - Stress
Q3 2023-24	Mental Health - Stress
	Respiratory – Cold/Cough/Influenza
	Genitourinary / Gynaecological / Reproductive
Q4 2023-24	Respiratory – Chest Infection
	Respiratory – Cold/Cough/Influenza
	Mental Health - Stress
Q1 2024-25	Mental Health - Stress
	Mental Health - Depression
	Musculoskeletal – Lower Limb
Q2 2024-25	Mental Health - Stress
	Cancer
	Mental Health - Other
Q3 2024-25	Mental Health - Stress
	Respiratory – Cold/Cough/Influenza
	Cancer & Tumors

Figure 1: Top 3 reasons for absence

Recommendation 2: HWFRS should make broad political representations for a centralised oversight body including all stakeholders to assist in the identification, analysis and remediation of large and generic risk.

The current CRMP asks questions which seem to have an in-built desired response. The first two questions talk about the identification of risk, however if the Service had considered the recommendation above there would be a mechanism in place to ensure all foreseeable risks were identified.

Recommendation 3: Put in place capacity within the service to produce extensive emergency planning to ensure policies, procedures, training and capacity are all sufficient to deal with all foreseeable fire service incident types.

Where there is uncertainty about the types and level of risks that Firefighters will face, due to gaps in the identification and analysis processes, similar gaps will exist regarding policies, procedures and training.



Recommendation 4: HWFRS should make broad political representations for a centralised oversight body including all stakeholders to evaluate changes to policies, procedures, equipment, PPE and training. This should be separate from but clearly coordinated with an IRMP oversight body;

Recommendation 5: HWFRS should use its influence to advocate strengthening of fire safety policies and their enforcement, and

Recommendation 6: HWFRS needs to promote a full stakeholder UKFRS coordinated body to plan and direct FRS response to national emergencies.

The Fire Brigades Union is the only organisation that has campaigned for national standards in the fire and rescue service since they were removed by successive Westminster governments. The FBU believes that national standards are a central mechanism to defend and improve our industry and would welcome support of HWFRS to achieve this goal. The FBU has long demanded a statutory advisory body, involving the FBU and other stakeholders, to produce, implement and monitor national standards. The Labour government who took office in July 2024 are committed to improving resilience and preparation across central government, local authorities, local communities, and emergency services. This includes formally working with all stakeholders in the fire and rescue services to inform policy and establish national standards. HWFRA should use its influence to help achieve this aim.

Recommendation 7: Due to increasing demand and risk HWFRS should use the period covered in this CRMP to expand its emergency response provision.

The Resource Review undertaken by HWFRS and signed off by HWFRA on 26 June 2024, towards the end of the 2020-2025 CRMP, was implemented soon after. This resulted in a loss of 7 fire engines, a downgrade of a full-size fire engine at Malvern to a smaller appliance, reduced fire cover for the third fire engine at Wyre Forest to night-times only and a reduction of retained (on-call) staff, including the disbandment of the retained duty system at Droitwich. This review made no consideration of risk, although it did acknowledge the likelihood of extended attendance times. Despite concerns raised by the FBU, specifically regarding the decision to reduce fire cover without conducting a full Integrated Risk Management Plan (or CRMP), the changes were imposed.

Recommendation 8: Include more emphasis on the positive results of fire service interventions both in terms of lives saved and economic benefit; and

Recommendation 9: When measuring and demonstrating impact, include more emphasis on the positive results of fire service interventions both in terms of lives saved and economic benefit.

The Fire Authority's Policy and Resources Committee receive statistics on a quarterly basis that cover the number of casualties (victims) who were rescued, received first aid (trauma) care, or who died at primary fires (figure 2.1) and road traffic collisions (figure 2.2) (shown below).



The number of people who are rescued from these incident types, either with a slight or serious injury, far outweigh those who pass away at the scene. These figures are however unlikely to include the number of casualties who die after leaving the incident or soon after due to their injuries. The CRMP document highlights the positive impact new technologies are having on our roads. This will include safety clothing for motorcyclists such as airbag vests that check for a fall 1000 times per second and deploy in under 100 milliseconds, integrated helmet lights that improve visibility, new technology including blind spot monitoring, automatic emergency braking, and lane departure warning, as well as the vehicles themselves. However, the speed and weight of attack and the actions of Firefighters during their time at an incident will have a positive impact on a casualty’s prognosis, including their recovery and rehabilitation. This is widely known as the platinum 10 minutes and the golden hour. These interventions will have positive results, both in terms of lives saved and economic benefit that are not reflected on in the CRMP.

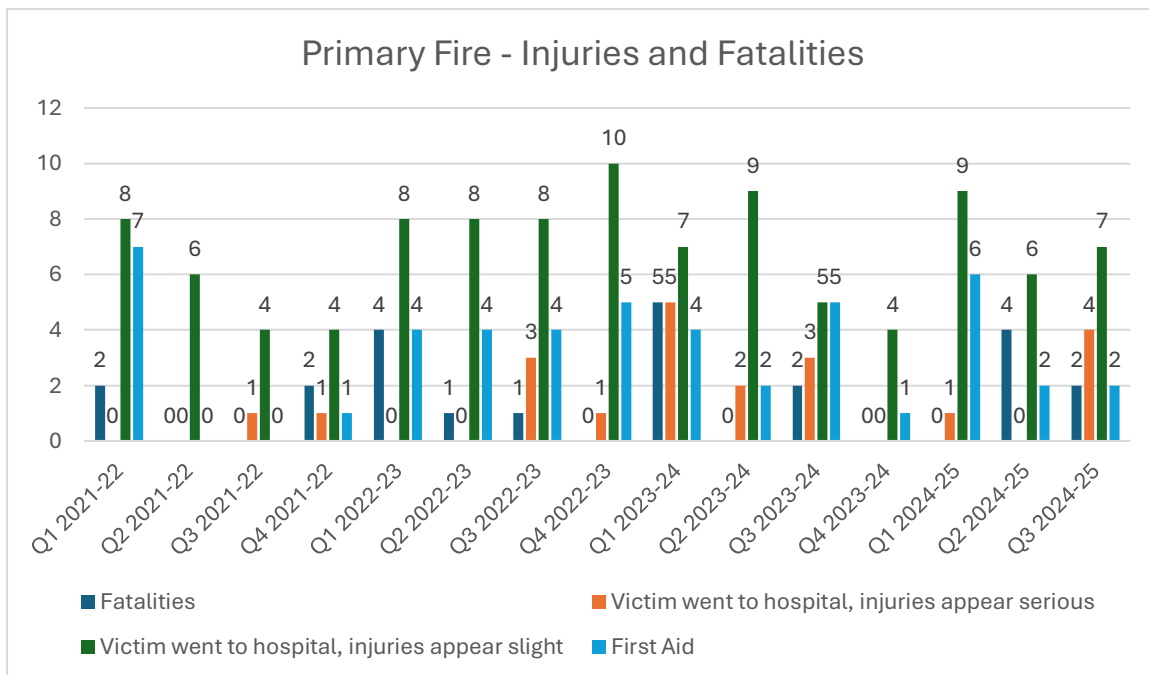


Figure 2.1: Primary Fire – Injuries and Fatalities

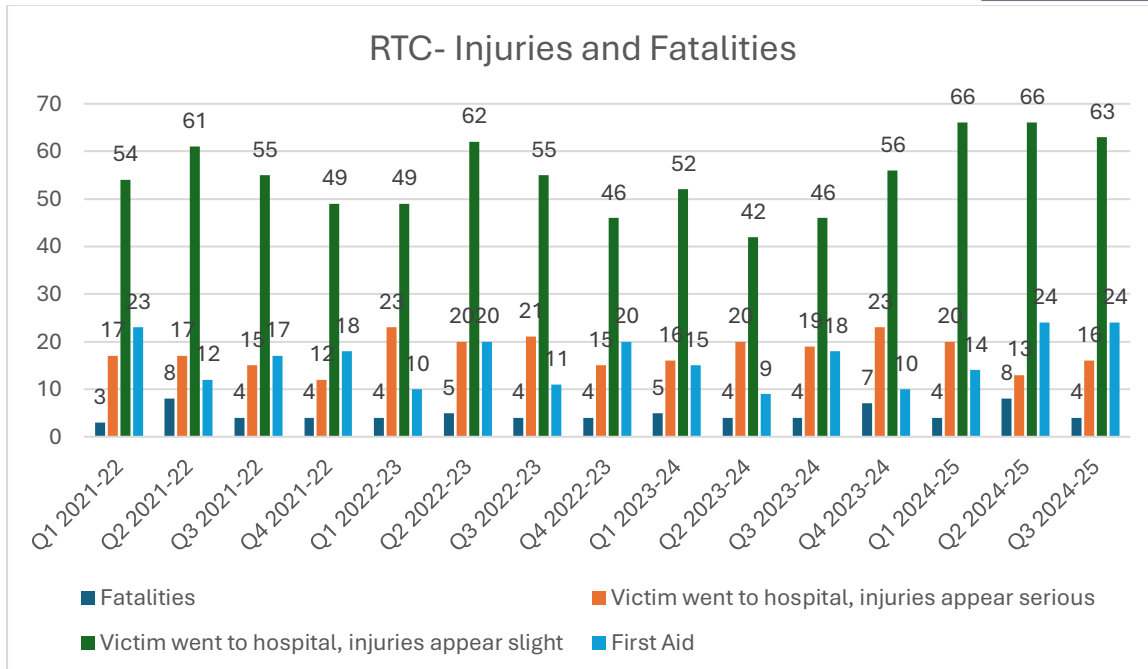


Figure 2.2: RTC – Injuries and Fatalities

Recommendation 10: HWFRS should review availability fire cover arrangements at the three Day Crewed stations with a view to reinvesting resources to recruit personnel to the Day Crewing Duty System.

HWFRS negotiated and agreed a Day Crewing Duty System with the FBU which was implemented in January 2024. This duty system has been successfully utilised alongside the legacy Day Crewed Duty System for over 14 months at Droitwich, Evesham and Malvern.

Recommendation 11: All fire engines must be crewed with five Firefighters.

Although the minimum and standard ridership levels remain to be 4, the number of Wholetime Firefighters that crew fire engines has increased to 5 on the majority of occasions following the introduction of the new duty system at the three stations listed in Recommendation 10 and the Resource Review which proposed to reinvest funds through cuts to retained (on-call) fire engines and personnel. Although the Resource Review was carried out, meaning the loss of seven fire engines as detailed in Recommendation 7, the proposed uplift of the number of wholetime personnel to include six positions at Leominster and Bromyard fire stations has not yet occurred. These posts should be established and the duty system worked by the staff working at each of these locations must be agreed with the FBU at the earliest opportunity.



Recommendation 12: HWFRS should declare its aim to replenish lost Firefighter posts, including those in other departments such as Fire Control, Training, Protection and Prevention.

Although Firefighter posts have recently increased, they are still a long way off from past figures. All departments listed above continue to struggle due to a lack of capacity and resilience and so this needs to be a priority for the Service. Previous Integrated Risk Management Plans such as the 2011-12 IRMP included detailed reviews of Training and Technical Fire Safety which included a plan, timescales, budgets and recommendations. This level of information, together with clear proposals, is missing from the CRMP.

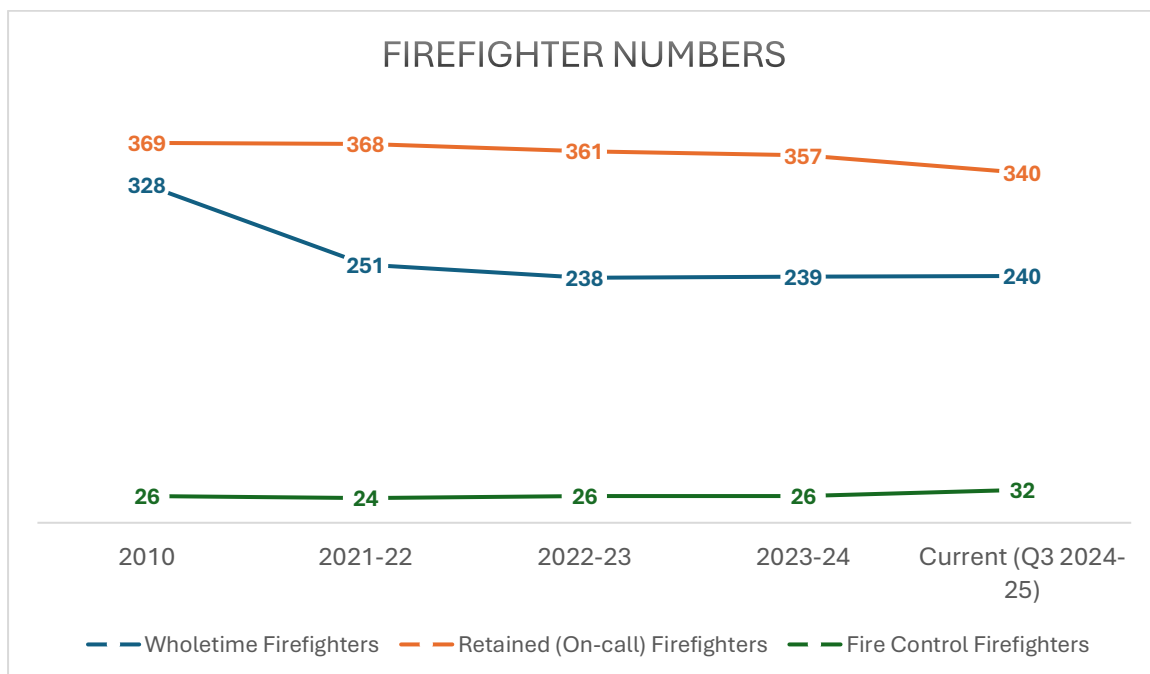


Figure 3: Firefighter Numbers

The graph above shows the change of staffing numbers over the term of the 2021-2025 CRMP and also compared to 2010 levels. Although wholetime staffing levels have recently increased as a result of the Resource Review as the CRMP states, the number should have increased by 18 but as explained in Recommendation 11, this is yet to be achieved despite the fleet being reduced by 7 fire engines. However, even with the increase the graph shows how minimal this was because staffing figures had been allowed to drop so low. The reduction from 2010 to current levels equates to a 27% reduction and a 4% reduction during the period of the current CRMP.

Retained crewing levels are constantly changing due to the relatively high turnover of staff but what is important to note is the range of contracted hours a retained Firefighter can provide and this ranges from 40 to 120 hours per week, however most retained Firefighters provide far more hours than they are contracted. This point is important because although the total reduction of retained Firefighters



over the last 14 years equates to 8% the number of hours that they are contracted to provide is likely to be far more. This is not reported anywhere, including in the draft CRMP so the true impact is unknown.

Fire control continue to struggle due to staffing levels, often working with just two members of staff on duty. This has a great impact on their mental and physical health which as covered in Recommendation 1 is one of the top 3 reoccurring reasons for absence across the workforce. Furthermore, the figures quoted are disingenuous and do not show the full story. Of the 32 members of staff who work in Fire Control, 4 are part-time (equating to 2 full time equivalent) and 5 are known as “resilience” Firefighters (one of whom is currently on maternity leave) who are contracted to work just 2 shifts each month after receiving a condensed training course which doesn’t cover all parts of a Control Firefighter role. The total of 32 also includes 4 Watch Commanders (two of whom are seconded to projects and don’t currently work in fire control), a wholetime Station Commander who doesn’t provide any cover in the control room, and a wholetime Firefighter who was seconded into fire control during their pregnancy and will return to their previous workplace when their maternity leave comes to an end. Two members of staff (one full time and one part time) are working their notice period and there is no plan to replace them. Taking all this into account it would be more accurate to say that there are 22 full time equivalent members of staff in Fire Control which will soon reduce to 20.5.

Recommendation 13: HWFRS should work with the FBU to examine establishment levels and rectify the shortfall.

There has been no dialogue about this important issue. In order to resolve shortfalls with establishment levels there needs to be an open and honest conversation. Numbers that are released to the public through quarterly Fire and Rescue Authority agenda papers, as explained above, need to be transparent if a solution is to be found. The FBU have been and remain committed to working with HWFRS to resolve this.

Recommendation 14: Recruitment and retention of Firefighters need urgent attention and results to recruit and retain Firefighters working the retained duty system before depletion accelerates.

HWFRS have looked at the issue of the recruitment and retention of retained Firefighters. As mentioned above at Recommendation 12, although Figure 3 shows a gradual reduction in the number of staff the true impact is unknown because of a lack of transparency pertaining to contracted hours. HWFRS need to investigate and report the true impact, across each station but also across the Service as a whole.



Recommendation 15: HWFRS should focus specifically on the needs of Fire Control and assists with the attendance at debrief sessions to prevent staff being affected due to mental ill health.

Although Fire Control staff are invited to Critical Illness Stress Debrief sessions the staffing issues in Fire Control (outlined in Recommendation 12) are not at a level where staff can be released in order to facilitate their attendance. This does not help to build a cohesive workforce where everyone is made to feel valued and safe. This is in itself a dichotomy to the Service's Culture statement which talks about an inclusive work environment where all staff are supported, recognised and feel safe.

Recommendation 16: HWFRS should as a matter of priority look to resolve all issues with MDTs and the mobilising system.

This matter remains unresolved. Although a new fire control system is being procured and there is a plan for new software to be installed on Mobile Data Terminals (MDTs) issues continue to occur and are frequently reported.

Recommendation 17: As a priority, increase crewing levels at Hereford to guarantee the immediate availability of two fire engines 24/7 by returning the second fire engine to 2-2-3 duty system.

Following the 2024 Resource Review the 3rd fire engine was removed from Hereford. Although there are retained Firefighters contracted to provide on-call hours during the day they are not being utilised unless required to attend in the Aerial Ladder Platform. The Resource Review has had a negative impact on Hereford and the surrounding areas. Not only is there now only 1 guaranteed fire engine available at night, if the wholtime crews are mobilised during the day to a water rescue incident for example, meaning a fire engine remains available at Hereford fire station, the retained staff who are trained, competent and available to take it to a fire, will not be used. Instead, resources will be mobilised from another station which will cause a delay in attendance and gaps in fire cover to occur elsewhere. This decision must be reversed and retained personnel at Hereford must be mobilised whenever they are needed regardless of the time of day. Furthermore, the third fire engine must be reinstated at Hereford.

This exact same situation exists at Worcester fire station where the fire engine and mobilisation issues listed above must be resolved by reinstating the 3rd fire engine and utilising retained crews at all times.



Recommendation 18: Engage early with the FBU to seek direction and solutions identified as areas for improvement by the HMICFRS.

During May to July 2023 His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) inspected HWFRS. The inspection report highlighted 11 areas for improvement and recommended that action be taken to address them. HWFRS prepared an improvement plan with target dates which extends up to the first quarter of 2025-26. Despite FBU members being required to implement the change HWFRS have not reached out to the FBU. This is disappointing but our members will not be surprised by this approach. However as previously stated, the FBU remain committed to working with HWFRS to resolve these and any future improvements identified by HMICFRS or any other inspecting body.

Recommendation 19: Use influence to respond to Winsor's report where his observations do not correspond to the experience or vision of HWFRS.

HWFRS must highlight the disconnect between its experience or vision where the observations of HMICFRS do not align.

Recommendation 20: All FRSs, including HWFRS should use opportunities to advocate increases to pay for all Firefighters.

Firefighter pay is negotiated through the National Joint Council – an arrangement the FBU defend. Although it is not linked to inflation, Figure 4 shows how pay has followed the rate of inflation (quoted from Statistica.com), sometimes above, but mostly below, since 2010.

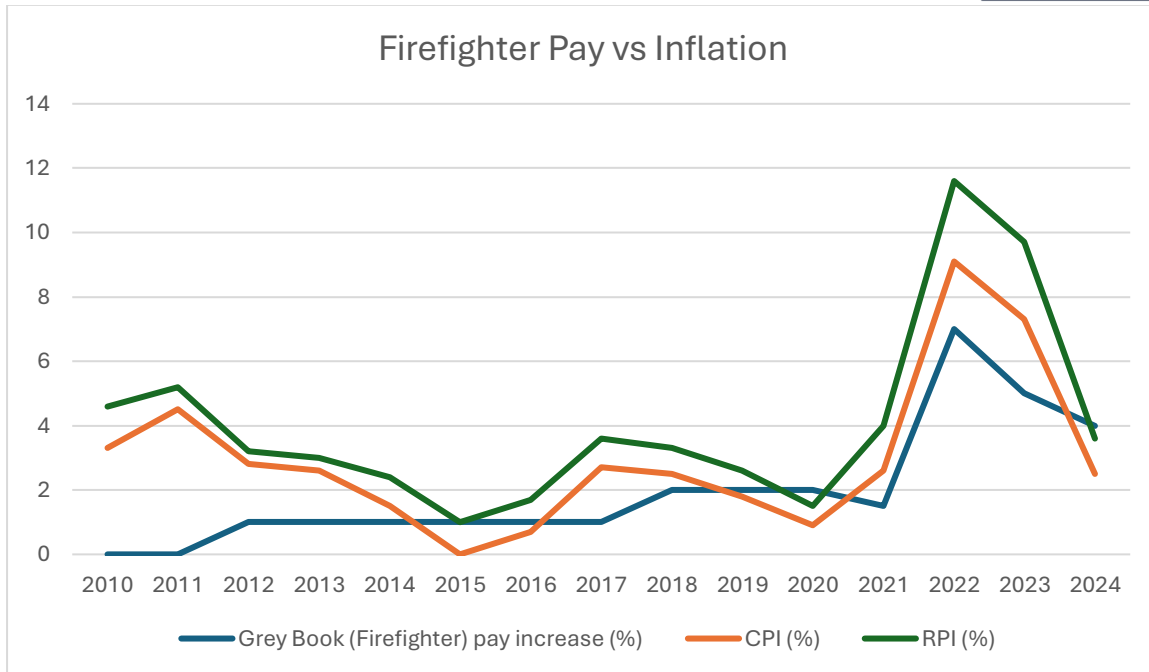


Figure 4: Firefighter Pay vs Inflation

The rate of pay for a Firefighter was frozen in 2010 and 2011 meaning the rate of pay for those two years did not change from the 2009 rate. Take for example the rate of pay for a competent wholetime Firefighter in 2009 which was £28,199. The current rate of pay for a competent wholetime Firefighter is £37,675. However, if the rate of pay had followed in line with inflation as measured by the Consumer Price Index (CPI) a competent wholetime Firefighter would now be earning £43,683, an additional £6,008 per annum or 15.9%. If however the rate of pay had followed in line with inflation as measured by the Retail Price Index (RPI) a competent wholetime Firefighter would now be earning £51,000, an additional £13,325 per annum or 35.4%.

Clearly Firefighter pay has fallen behind and HWFRS should use every possible opportunity to resolve this.



Recommendation 21: HWFRS should make representations to central government to increase funding to FRSs (including for pay) to undertake extra activities.

The draft CRMP acknowledges several times that budget constraints impact Service delivery. It is concerning that the report states "a report with options for future efficiencies will be brought forward for consideration at a future date". Any proposed cuts or "redistributions" should have been made clear in the CRMP. Any future proposals must be a matter for public consultation and therefore not implemented beforehand on the weight of response to this current consultation process.

The draft document states that, "During the research stage of this CRMP process, it has been clear that there is a shift from 'Fire' to 'Rescue' incidents seeing a gradual decrease in dwelling fires and, conversely, an increase in incidents such as water rescue and Road Traffic Collisions (RTC). This trend highlights the importance of the diversity of skills within our FRS and provides assurance our training and resources are correctly directed.

HWFRS should take every opportunity to lobby central government for increased funding and for a statutory duty to attend water rescue incidents.

Recommendation 22: Discuss with the FBU further details and expectations arising from the proposal "examine ways to reduce the socio-economic costs of fire."

Part of the Core Prevention Strategy 2021-2025 was to "examine ways to reduce the socio-economic costs of fire". There has been no discussion with the FBU about this and it is not entirely clear what this meant, or what the outcomes of this work are.

Recommendation 23: Provide further clarity consistent with Firefighter rolemaps on the expectation of HWFRS role in reducing "the risks associated with our roads to ensure fewer people are killed or injured in road traffic collisions".

This was another aim of the Prevention directorate for the 2021-2025 CRMP. The 2025-2030 CRMP notes that the education and risk reduction initiatives for young drivers and other at-risk road users was not previously targeted at the right people and the initiative has been redesigned. However, what isn't clear is how this project fits within Firefighter rolemaps, or if there is any expectation that Firefighters are part of this work at all.

Recommendation 24: Reinvest in the capacity of the Fire Safety department employing more FSIOs with appropriately high levels of training to ensure vigorous enforcement of fire regulations.

This recommendation is still relevant and HWFRS should take it into account.



Recommendation 25: Any proposal to alter response standards must only be to improve the existing standard (which in our view is already insufficient).

We have already referred to the Response Review and the detrimental impact it has had on the Service. Removing seven fire engines which HWFRS claimed to have a low average availability has not improved the average availability of all retained (on-call) fire engines. The graph below (Figure 5) shows the average availability of retained fire engines for each quarter of the 2021-2025 CRMP. The figures were taken from the quarterly performance reports to the Fire Authority’s Policy and Resources Committee.

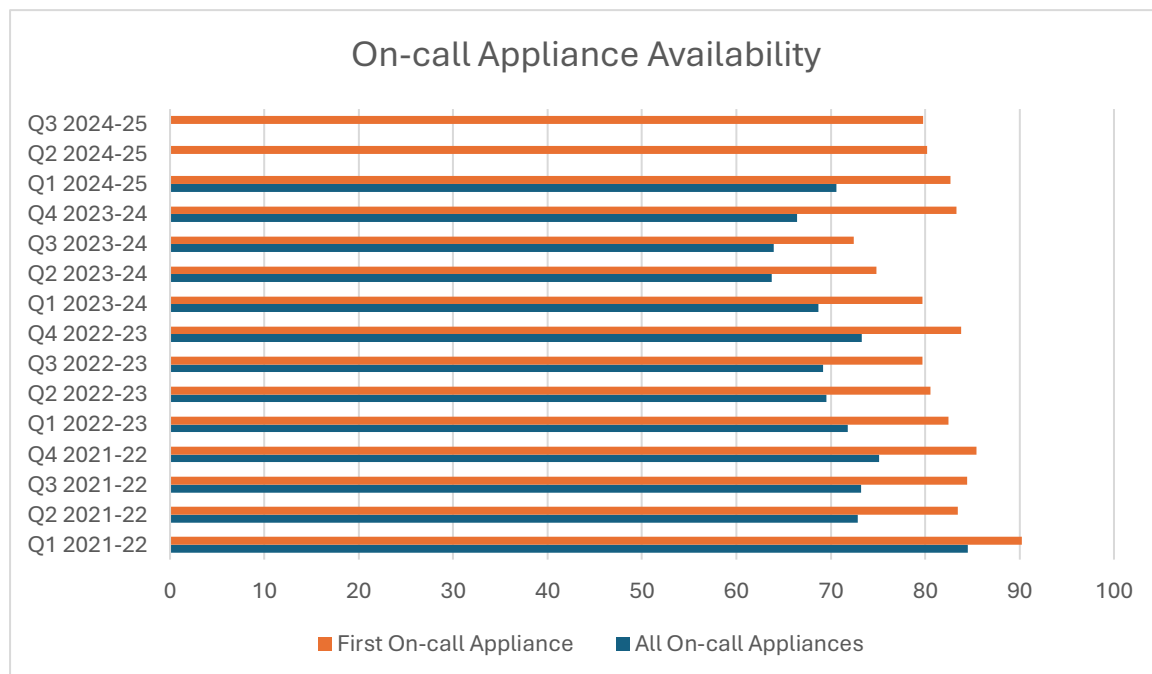


Figure 5: On-call Appliance Availability

The average availability for the first appliance over the according to the figures used from the last fifteen quarterly reports is 81.54%. The last two quarterly figures, which are since the removal of the seven fire engines as per the HWFRS Resource Review are both less than this average (Q2: 80.24% and Q3: 79.8%). This should be disappointing to HWFRS and HWFRA who should be expecting to see a measurable increase in the average availability and must bring into question the impact of the decision and how to resolve it. To be clear, as per Recommendation 17 above, the 3rd fire engines at Hereford and Worcester must be reinstated.

Recommendation 26: Repeal the graded response policy.

The graded response policy remains in place.



Recommendation 27: Once new or increasing activities, or changes to policies and procedures to deal with climate change are identified, these need to be discussed and where appropriate negotiated with the FBU at the earliest opportunity.

The draft CRMP consultation asks to what extent do you agree or disagree that HWFRS should review and if necessary, develop its capabilities for Water / Flood Rescue and Wildfire. These are the only questions asked in relation to what the document describes as “the most pressing environmental challenge for all FRS[s]”. The report goes on to state that, “HWFRS has previously consulted on this [flooding] in CRMPs with our community, who overwhelmingly wanted us to provide those services”. Based on the response what have HWFRS done to get funding? We have to consider that there is no statutory duty for FRS’s in England to respond to flooding events and that there is no funding for such equipment / PPE / training, however HWFRS respond to an increasing number of flood related incidents which can be seen in Figure 6 below. However, it is important to note that these figures are misleading because as the “Foreseeable Risk Assessments” document states on page 35, “Between 16th February and 2nd March 2020, 161 properties were attended by the Service. However, the actual number of properties is likely to be have been considerably greater as several properties would have been attended in succession but recorded under a single incident number”.

Recommendation A: HWFRS and HWFRA must take every opportunity to lobby government for a statutory duty for FRSs in England to respond to flooding events and work with the FBU in doing so.

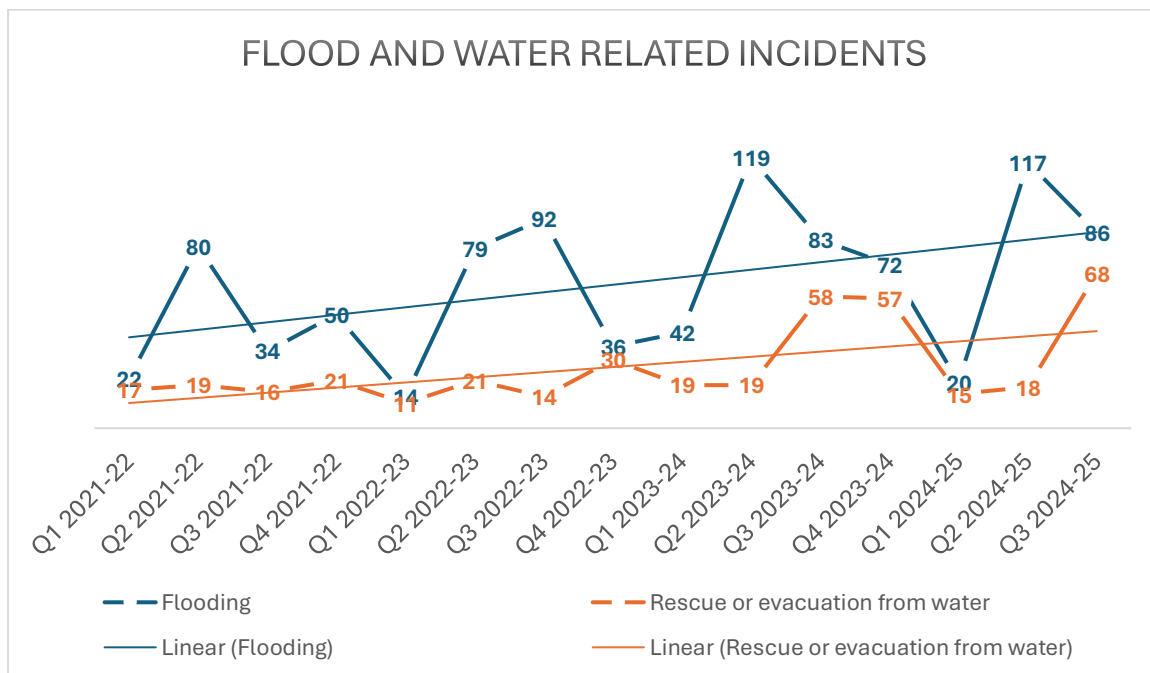


Figure 6: Flood and Water Related Incidents



We again make the case that once new or increasing activities, or changes to policies and procedures to deal with climate change are identified, these must be discussed and where appropriate negotiated with the FBU at the earliest opportunity.

Recommendation 28: Once any new activities, or changes to policies and procedures to deal with partnership working are identified, these need to be discussed and where appropriate negotiated with the FBU at the earliest opportunity

Whilst HWFRS is proactive in collaborating with other agencies there is very little consultation or negotiation that takes place with the FBU.

An example of this is the Service's proposal to reduce the number of On-Call Support Officer (OCSO) posts from 8 to 6. At the point of writing this response this is an ongoing process but the outcome appears to be predetermined as there has been no consultation with the FBU other than to communicate the Service's intention, and despite concerns being raised formally our members have been asked to complete forms to facilitate the process.



5. Grenfell Tower

The fire at Grenfell Tower in the London borough of Kensington and Chelsea on Wednesday 14th June 2017 is a dark day in the history of the UK. In the aftermath of the Grenfell Tower fire, politicians and leading fire service figures alike declared the atrocity as a “game-changer.” Despite the regretful terminology, the belief espoused was that things must change; and change for the better for the fire service sector. That this has not substantially been the case some 96 months later is a tragedy in its own right. Most significantly is the lack of action to prevent a re-occurrence, in terms of the numbers of high-rise buildings that to this day are still shrouded in flammable cladding and other building safety matters outstanding as expressed by Lord Porter:

The LGA will continue to support this work, but the reform of our broken building safety legislation – including the granting of effective powers and meaningful sanctions to regulators - cannot come soon enough, and as the recent HCLG Select Committee report argued, the Government will need to increase the funding available if all fire safety issues are to be resolved.

It is totally unacceptable that government and all other responsible bodies are continuing everyday to risk the lives of an estimated half a million residents, and in the event of another fire the lives of Firefighters, by the scandalous inaction in removing these lethal building additives. This scandal is further compounded, demonstrating complacency by the fires at the Barking Riverside in June 2019, The Cube student halls in Bolton in November 2019, the New Providence Wharf in Poplar in May 2021, and Moss Hall Grove in Finchley in June 2023. Thankfully, no lives were lost at these fires but they were all wrapped in lethal cladding and were rapidly engulfed in flames causing huge destruction.

It cannot go unmentioned, that Grenfell Tower is situated in a very wealthy borough in a very wealthy country, but still social injustice had and continues to have a massive, devastating impact on the origins of the fire and its aftermath. Justice 4 Grenfell and other groups strive for justice and action and are solidly supported by the FBU. The absence of other voices (or at least their inaudible volume) from elsewhere in the sector and from government is reprehensible.

The bereaved, survivors’ and relatives’ (BSR) suffering continues as do the Firefighters who went into Grenfell Tower at considerable risks, with the sole aim of trying to save life. Many Firefighters and emergency control Firefighters rescued people or helped them evacuate from the building that night. Every Firefighter has suffered from the physical and mental effects of intervening at Grenfell as is often the case at traumatic incidents. We understand that the Service’s People Strategy implements a commitment to staff wellbeing through the welfare support structure and this needs firmer commitment of resources for the longer term.

The consultation document makes reference to the Phase 1 Grenfell Tower Inquiry (GTI) report and one of the Response aims is to, “Ensure Firefighters are well trained, well equipped and well led, including the outcomes of the national incidents and enquiries; for example Manchester Arena and Grenfell Tower”. Here we will consider the findings and recommendations of that report and also the GTI Phase 2 report:



Grenfell Tower Inquiry: Phase 1 Report

The phase 1 report published in October 2019 lists several recommendations that are not referred to in the consultation document.

Recommendation B: HWFRS should consider and act upon all recommendations in the GTI reports.

We list several recommendations here from the GTI reports that are particularly noteworthy and pertinent to HWFRS:

Recommendation 33.14 c. That all control room operators (CROs) of Assistant Operations Manager rank and above receive training directed to the specific requirements of communication with the incident commander.

Recommendation 33.15 a. That the London Fire Brigade's (LFB's) policies be amended to draw a clearer distinction between callers seeking advice and callers who believe they are trapped and need rescuing.

Recommendation 33.15 b. That the LFB provide regular and more effective refresher training to CROs at all levels, including supervisors.

Recommendation 33.15 c. That all fire and rescue services develop policies for handling a large number of Fire Survival Guidance (FSG) calls simultaneously.

Recommendation 33.15 d. That electronic systems be developed to record FSG information in the control room and display it simultaneously at the bridgehead and in any command units.

Recommendation 33.15 e. That policies be developed for managing a transition from "stay put" to "get out".

Recommendation 33.15 f. That control room staff receive training directed specifically to handling such a change of advice (from "stay put" to "get out") and conveying it effectively to callers.

Recommendation 33.18 a. That the LFB develop policies and training to ensure better control of deployments and the use of resources.

Recommendation 33.18 b. That the LFB develop policies and training to ensure that better information is obtained from crews returning from deployments and that the information is recorded in a form that enables it to be made available immediately to the incident commander (and thereafter to the command units and the control room).

Recommendation 33.19 That the LFB develop a communication system to enable direct communication between the control room and the incident commander and improve the means of communication between the incident commander and the bridgehead.



Recommendation 33.20 That the LFB investigate the use of modern communication techniques to provide a direct line of communication between the control room and the bridgehead, allowing information to be transmitted directly between the control room and the bridgehead and providing an integrated system of recording FSG information and the results of deployments.

Recommendation 33.21 a. That the LFB urgently take steps to obtain equipment that enables Firefighters wearing helmets and breathing apparatus to communicate with the bridgehead effectively, including when operating in high-rise buildings.

Recommendation 33.21 b. That urgent steps be taken to ensure that the command support system is fully operative on all command units and the crews are trained in its use.

Recommendation 33.22 b. That fire and rescue services develop policies for partial and total evacuation of high-rise residential buildings and training to support them.

Recommendation 33.31 b. That on the declaration of a Major Incident clear lines of communication must be established as soon as possible between the control rooms of the individual emergency services.

Recommendation 33.32 That steps be taken to investigate the compatibility of the LFB systems with those of the Metropolitan Police Service (MPS) and the London Ambulance Service (LAS) with a view to enabling all three emergency services' systems to read each other's messages.

Recommendation 33.33 That steps be taken to ensure that the airborne datalink system on every National Police Air Service (NPAS) helicopter observing an incident which involves one of the other emergency services defaults to the National Emergency Service user encryption.

Recommendation 33.34 That the LFB, the MPS, the LAS and the London local authorities all investigate ways of improving the collection of information about survivors and making it available more rapidly to those wishing to make contact with them.

Grenfell Tower Inquiry: Phase 2 Report

Although the consultation document does not refer to the Grenfell Tower Inquiry Phase 2 report, there are several recommendations of note that HWFRS should be aware of and including in any plan, such as the CRMP.

Part 2 of the Phase 2 report is entitled *“The path to disaster”* and concludes that *“the fire at Grenfell Tower was the culmination of decades of failure by central government and other bodies in positions of responsibility in the construction industry to look carefully into the danger of incorporating combustible materials into the external walls of high-rise residential buildings and to act on the information available to them.”* The report is also critical of LFB stating that, *“it should have responded more effectively to its experience at Lakanal House and made better use of the knowledge it had gained of the dangers posed by modern materials and methods of construction”* and that *“it failed to ensure that in the years immediately preceding the Grenfell Tower fire regular training of a suitable kind was*



provided to its control room operators on handling many fire survival guidance calls concurrently and on their duties more generally". Furthermore the report states, "Those failures were attributable to a chronic lack of effective management and leadership, combined with an undue emphasis on process. Senior officers were complacent about the operational efficiency of the brigade and lacked the management skills to recognise the problems or the will to correct them. Those managerial weaknesses were partly the result of an historic failure to integrate the operational departments and the departments responsible for support functions, in particular the control room. There was a tendency to treat problems of which managers became aware as undeserving of change or too difficult to resolve, even when they concerned operational or public safety".

This failure ultimately put the public and emergency service personnel at high levels of risk and we therefore consider it essential that the following recommendations are considered as part of the CRMP:

Recommendation 113.55 That His Majesty's Inspectorate of Constabulary and Fire and Rescue Services ("the Inspectorate") inspect the LFB as soon as reasonably possible to assess and report on:

- a. the extent to which the control room is now integrated into the organisation;
- b. the effectiveness of the arrangements for identifying the training needs of control room staff, delivering effective training and recording its outcomes;
- c. the effectiveness of the control room generally;
- d. the ability of the control room to handle a large number of concurrent requests for advice and assistance from people directly affected by fires or other emergencies; and
- e. the quality and effectiveness of the arrangements for communication between the control room and the incident commander.

Recommendation 113.56 That as soon as reasonably possible the Inspectorate inspect the LFB to examine and report on the arrangements it has in place for assessing the training of incident commanders at all levels and their continuing competence, whether by a process of revalidation or otherwise.

Recommendation 113.57 That as soon as reasonably practicable the Inspectorate inspect the LFB to examine and report on its arrangements for collecting, storing and distributing information in accordance with section 7(2)(d) of the Fire and Rescue Services Act 2004, and in particular its arrangements for identifying high-risk residential buildings and collecting, storing and distributing information relating to them.

Recommendation 113.58 That the LFB establish effective standing arrangements for collecting, considering and effectively implementing lessons learned from previous incidents, inquests and investigations. Those arrangements should be as simple as possible, flexible and of a kind that will ensure that any appropriate changes in practice or procedure are implemented speedily



Recommendation 113.59 That fire and rescue services that continue to use low power intrinsically safe radios as part of breathing apparatus consider reserving them only for situations in which there is a real risk of igniting flammable gases and generally using radios of higher power, particularly in highrise buildings.

Recommendation 113.60 That all fire and rescue services give consideration to providing all Firefighters with digital radios.

Recommendation 113.61 That Firefighters be trained to respond appropriately to the loss of communications and to understand how to restore them.

Recommendation 113.62 That basic training on the structure and operation of the water supply system, including the different types of hydrants in use and their functions, be given to all Firefighters. Training should also be given on effective measures to increase water flow and pressure when necessary.

Recommendation 113.63 That all fire and rescue services establish and periodically review an agreed protocol with the statutory water undertakers in their areas to enable effective communication between them in relation to the supply of water for firefighting purposes.

There are several parallels that can be drawn between the report and changes currently being implemented in HWFRS, therefore whether the recommendation makes reference to “all fire and rescue services” or specifies “LFB”, HWFRS should consider them and make every effort to be compliant. An example of this is where the report states that, “The senior officers responsible for the control room understood the need to give priority to training staff in handling fire survival guidance calls, but in the years between 2010 and 2017 no structured or regular refresher training in handling fire survival guidance calls was designed or delivered to control room staff.” Fire survival guidance is something that takes place on the fire ground with the Incident Command Units based at Wyre Forest and Malvern and the long-term goal is that this can be linked to all fire appliances. There is currently no training provided to crews and this should be resolved as a priority.

Furthermore, the report states that, “The LFB’s policies did not contemplate a widespread loss of communications or provide guidance on how it could effectively be restored.” There is currently nothing in place in the event of a widespread loss of communications in HWFRS and this should be resolved as a priority.



6. Resource Review

The consultation document states, “Whether the risks to our communities are natural, technological or human-made, our goal is to ensure we can respond effectively to assist, minimise their impact where we can and safeguard our community’s people, property and environment”. It also states, “By conducting this detailed assessment of risk HWFRS can assure itself, and the communities we serve that we have the appropriate resources in the correct locations to respond to these foreseeable risks”. The FBU agrees that through a process of identifying and examining the risks, clear proposals could have been made in this CRMP to ensure HWFRS have the right number of people and resources in the right place at the right time, however, on 26 June 2024 HWFRA agreed to implement the proposals of the HWFRS Resource Review. The consultation document, “Strategic Understanding of Risk, Incident Type – Demand” quotes figures from a five-year period from 1 April 2019 to 31 March 2024. It is important to note that this time period is before the Resource Review took place, when there were 7 additional fire engines in the Service’s fleet. Throughout the CRMP evidence is provided to show that the risk is increasing. However, the Resource Review gave no consideration to the risks faced by the two counties and resulted in a loss of 7 fire engines, a downgrade of a full-size fire engine at Malvern to a smaller appliance, reduced fire cover for the third fire engine at Wyre Forest to night-times only and a reduction of retained (on-call) staff, including the disbandment of the retained duty system at Droitwich. The review did however acknowledge the likelihood of extended attendance times and was implemented despite concerns raised by the FBU, specifically regarding the decision to reduce fire cover without conducting a full Integrated Risk Management Plan (or CRMP).

The views expressed by the Chief Fire Officer (CFO) at the Fire Authority meeting on 26 June 2024 was that it is Firefighters that are needed at fires, not necessarily fire engines. Councillors agreed that in order to transport additional staff to incidents vehicles would be allocated to some of the stations that had lost a fire engine. However, the guidance that crews refer to for these vehicles are incredibly restrictive and go against the sentiments of the CFO. For example, they are only to be used at incidents within 20 miles of the fire station that they are based, it is optional for personnel to go to the incident, although the vehicles have blue lights and have an off-road capability they are not to be used off road and no exemptions can be used, such as blue lights and sirens. The FBU have raised concerns about this guidance, on which there was no consultation, however our concerns have not been addressed.

Recommendation C: HWFRS must review the Crew Carrier guidance document and consult with the FBU on it, including the vehicles issued to stations to ensure the guidance and vehicles are fit for purpose.

The FBU consider the changes implemented through the Resource Review to be in direct conflict with the IRMP process and the National Fire Chief’s Council (NFCC) CRMP Framework. The consultation document executive summary highlights many of the challenges that HWFRS will face over the coming period, however the ability for HWFRS to manage the increasing, changing and emerging risks with a new service structure is largely unknown and unexplored as there are no clear proposals detailing how the Service will adapt and evolve to meet the needs of the two counties of Herefordshire and Worcestershire, especially considering the new streamlined version of the Service structure.



As mentioned in Section 4, “Review of Recommendations to 2021-2025 CRMP” the draft CRMP acknowledges several times that budget constraints impact Service delivery. It is concerning that the report states, “a report with options for future efficiencies will be brought forward for consideration at a future date”. Any proposed cuts or “redistributions” should have been made clear in the CRMP. Any future proposals must be a matter for public consultation and therefore not implemented beforehand on the weight of response to this current consultation process.



7. Attendance Times

As stated above the Resource Review acknowledged that attendance times will increase as a result of the proposals being implemented. The forecasted extended time was up to 6 minutes and 18 seconds to 0.38% of incidents; this was on top of an already increasing attendance time. Figure 7 shows the 2-year average attendance times from quarter 1 2021-22 to quarter 4 2022-23. These times range from 10 minutes 26 seconds to 11 minutes 51 seconds, a difference of 1 minute 25 seconds.

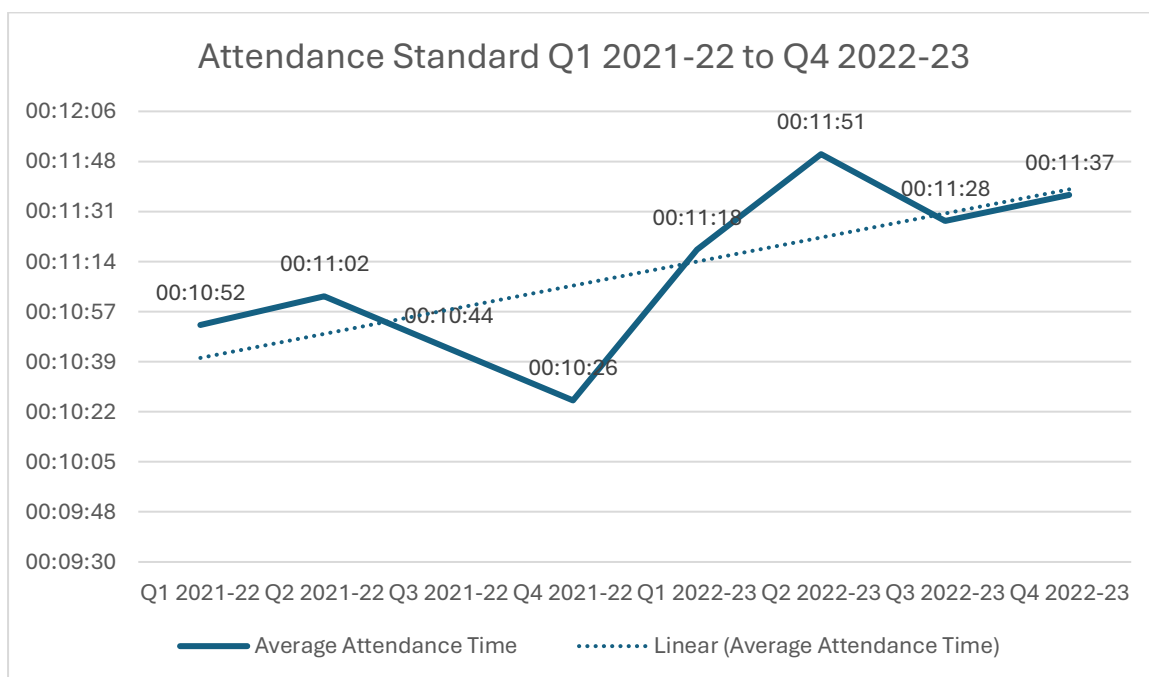


Figure 7: Attendance Standard Q1 2021-22 to Q4 2022-23

Following the HWFRA meeting on 15 February 2023 the Attendance Standard was changed in April 2023 from one appliance within 10 minutes to all primary building fires on 75% of occasions to what is known as the “Attendance Performance Measure” which gives a target time of 10, 15 or 20 minutes depending on the distance from the fire station. However, this target does not consider the risk, and it is not inclusive of the call handling time. Incidentally, when the Attendance Performance Measure was introduced, through the public consultation the public were told that call handling time would be monitored and reported on – since its introduction the Service have not reported these figures and must start to do so.

Prior to the HWFRA meeting on 15 February the FBU wrote to members of the Fire Authority to outline our concerns:



Since the removal of national standards the Service is responsible for setting it's own standard; a standard that has never been achieved. Attendance times are getting longer and the Service's response to fires is getting slower but the FBU believe that the solution to this is investment through recruitment and focusing on the availability of personnel, not extending the target, or by discounting call handling time.

Within our response to the CRMP consultation we raised concerns over the consistently slower attendance times and referred to figures dating back to 1999 which illustrate this trend. The most recent figures which were reported within the Full FRA agenda pack in December 2021 showed that the average attendance time increased from 11 minutes 1 second recorded in Q2 2020-21 to 11 minutes 2 seconds in Q2 2021-22. Although this appears a small increase, it is indicative of the unrelenting incremental trend of longer response times.

The HMICFRS report published in December 2021 stated, "However, we were encouraged to see that the availability of fire engines increased by 7 percent between 2019/20 and 2020/21. If the service sustains this improvement, it could meet its response standards to fires and other incidents." It is therefore concerning that you are being asked to align the HWFRS Attendance Standard with the standard currently in place in Shropshire. Shropshire FRS have the ability to set their own standards but this cannot be simply transferred to other services. Shropshire FRS will have different risks to manage compared to those in Hereford and Worcester; there will be differences in geography, road networks, waterways and the makeup of towns, villages and industry. Shropshire FRS also have different ways of managing their risks, including the number of fire stations, appliances, personnel, equipment and the training provided.

The current Attendance Standard has long been in place not only as a measure to report on, but also for the safety of our communities, the people who live, work and study here, for those who travel through them and for our members who respond to emergencies when things go wrong. We would like to know, how will extending the target improve safety? How will it help to improve the lives of your constituents? How will it provide better value?

The FBU have no issue with the Service reviewing the standards they set for themselves but we believe it must be evidenced in sound reasoning and not for removing scrutiny or convenient and arbitrary alignment with Shropshire. We also ask what is the purpose of setting a target which you know you can achieve? Our members are well aware of the risks they face when responding to incidents and do so mindful of the safety of the public and their colleagues. Their focus is on saving saveable lives and proceed at a proportionate and calculated speed. The Service should be looking at all options to reduce attendance times, whether that be through more Firefighters, improved availability or technology. When dealing with a casualty the clock is already ticking from the second the fire occurs or the moment of the collision or any other emergency incident. We refer to this as the "platinum 10 minutes" or the "golden hour". Discounting call handling time does not give any consideration to casualties in their moment of need or to the conditions Firefighters face when they arrive on scene.

Again, the FBU believe that the solution to this is investment through recruitment and focusing on the availability of personnel, not extending the target, or by discounting call handling time.



Figure 8 illustrates the trend since April 2023 when we consider the total number of incidents and compare that as a percentage in relation to the number of occasions the 10 minute attendance time was achieved . It is however important to note that these figures do not include call handling time (the previous standard was from time of call, not time of mobilisation) and despite the gradual improvement over the last seven quarters, the figures are still below the previous target of 75%.

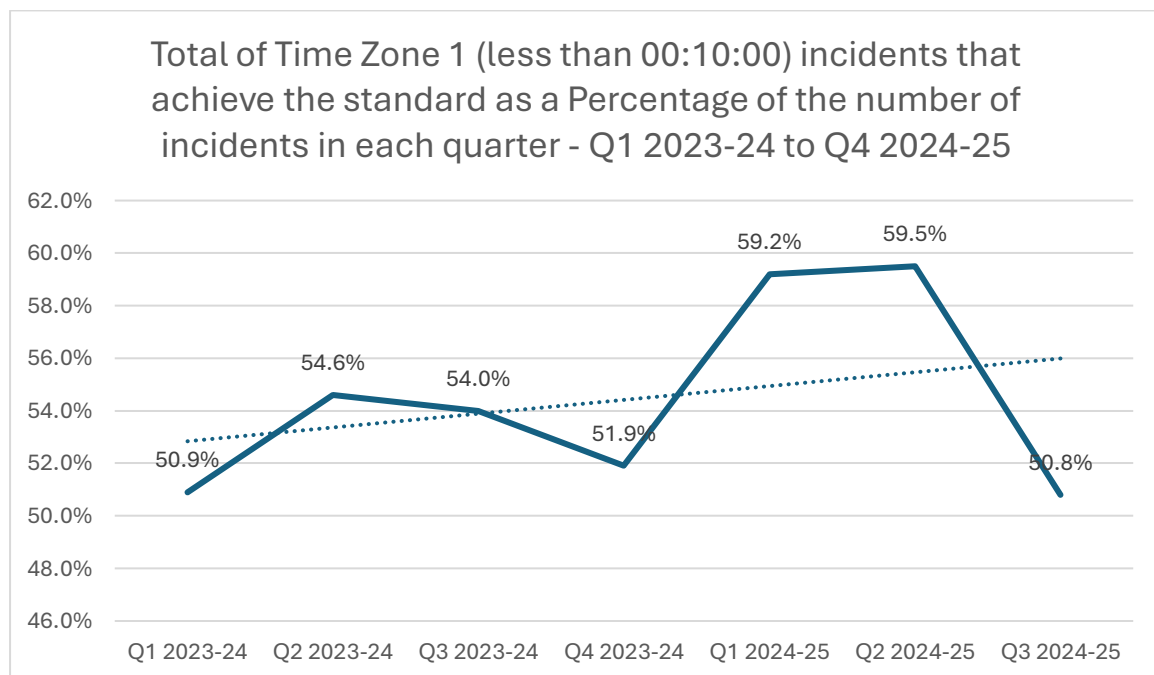


Figure 8: Total of Time Zone 1 (less than 00:10:00) incidents that achieve the standard as a Percentage of the number of incidents in each quarter - Q1 2023-24 to Q4 2024-25

For transparency, Figure 9 below shows the trend since April 2023 for all three of the APM time zones and how there has been a overall gradual improvement.

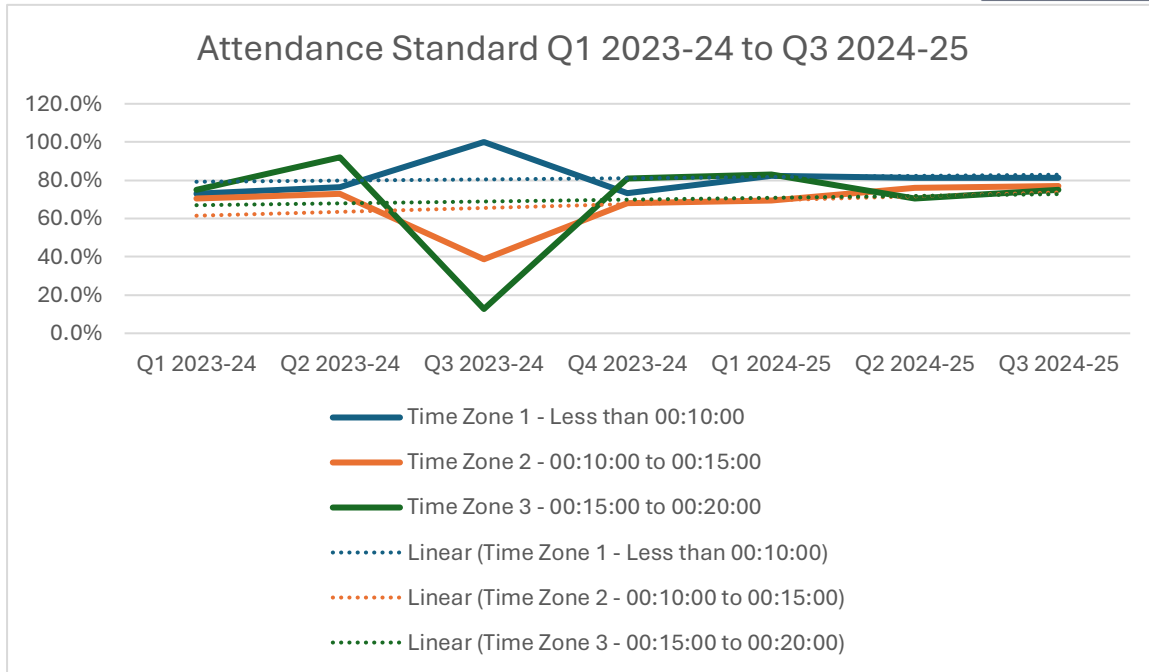


Figure 9: Attendance Standard Q1 2023-24 to Q3 2024-25

In order to provide the best service to the communities we serve the Service needs to make long-term improvements and investments, not move the targets it sets for itself. There was no consideration of the risks Firefighters face at incidents or the multitude of factors, such as building construction; increasing complexity and variety of incidents; road networks; the make-up of our towns, cities, villages; the demographic when the decision to change the attendance standard was taken. It was a simple political proposal to align with Shropshire, which gave no thought to how that standard was reached and evidenced or the factors it considered or discounted.

As the graphs above show, the decision to align the attendance standard with Shropshire has not made people safer, it has not protected businesses and it has not better protected Firefighters.



8. Firefighter Staffing Levels

The issue of slow response times is not unique to Hereford and Worcester, with more than 11,000 Firefighter posts (around 1 in 5) lost across the UK since 2010, response times have increased everywhere. In Hereford and Worcester, between 2011 and 2021, we have seen a 25% reduction of frontline staff. Figure 10 below was created using figures taken from reports produced for the HWFRA:

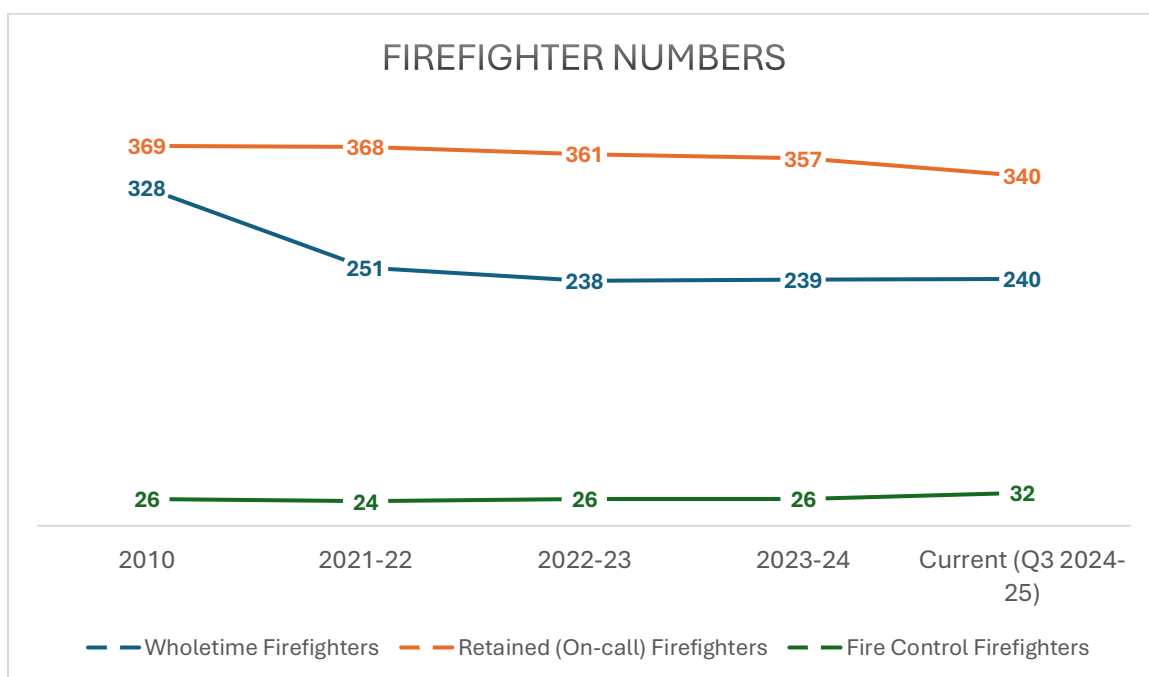


Figure 10: Firefighter Numbers 2010 compared to current figures

Slower response times are a result of central government cuts - Since 2016 alone around £140m has been taken out of the fire and rescue service in England. Decades of cuts have resulted in fewer Firefighters, fire engines and fire stations.

Slow response times means more serious fires and other incidents, more deaths, more injuries, more serious damage to houses and businesses and greater risk to Firefighters. This is exactly what our members have experienced, including most recently at 2 large incidents in Kidderminster. Issues also extend to fire control, the first point of contact for members of the public, where staffing levels have dropped to the point where there are often just 2 on duty. This of course has a huge impact on attendance times and staff wellbeing.

The report published December 2021 following the third inspection of HWFRS by Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) stated, "However, we were encouraged to see that the availability of fire engines increased by 7 percent between 2019/20 and



2020/21. If the service sustains this improvement, it could meet its response standards to fires and other incidents.” Here HMICFRS draw a correlation between the availability of fire engines (which is directly affected by the numbers of Firefighters) to response times. The FBU agree and believe that the solution to the slow (and consistency extending) attendance times is investment through recruitment and focusing on the availability of personnel, not extending the target, or by discounting call handling time as per the changes implemented through the Attendance Performance Measure.

As a result of the cuts to Service fleet and personnel through the Resource Review there was supposed to have been a “reinvestment” of the money saved, some £967, 000, into the Wholetime workforce, increasing the total number by eighteen. The consultation document states that, *“the strategic decision from the recent Resource Review was made to reinvest money from the removal of some of the least used On-Call fire engines on stations with more than one fire engine, into employing more front line Wholetime Firefighters on our busiest fire engines.”* Although wholetime watch sizes have increased from five to six on some stations, Figure 10 above shows the true picture. Departments are being reduced in size and Grey Book (operational) roles are being changed to Green Book (support) roles, resulting in an overall increase in the Wholetime establishment of two since 2022/23, but a reduction of eleven since 2021/22 or eighty-eight since 2010. Despite guarantees that the money saved as a result of cutting seven fire engines will be used to increase the Wholetime establishment, including three posts at Leominster and three posts at Bromyard, these increases are yet to be realised.

As can be seen in Figures 5, 10 and 11, staffing levels are already too lean. In our response to the current CRMP we listed 12 recommendations; Recommendation 12 was that HWFRS should declare its aim to replenish lost Firefighter posts, including those in other departments such as Fire Control, Training, Protection and Prevention. One of the aims set out under ‘Response’ in the draft CRMP is to “Provide a prompt, safe and effective response to fires and other emergencies”. In order to achieve this HWFRS state that they will “Continually review fire emergency cover to ensure appropriate provision of resources and crewing arrangements”. Our members in Fire Control are the first point of contact for anyone requiring the assistance of the Service. They do an incredible job to protect members of the public and Firefighters at the scene, however they are currently unable to provide the best level of service and complete all parts of their role due to being understaffed and overstretched. In order to provide a prompt, safe and effective response to fires and other emergencies HWFRS must focus on increasing the number of wholetime staff in Fire Control.

9. Appliance Availability

The FBU have raised on numerous occasions the issue of the availability of fire engines and other appliances. Retained appliance availability statistics can be viewed on the HWFRS website, [here](#). Page 44 of the draft CRMP includes an image that our members are all too familiar with:



Figure 11: Appliance Availability and Resilience

Although the image is blurred it is clear how many of the Service's appliances are unavailable, these are denoted by the red boxes and equate to approximately 30% of the Service's retained (on-call) appliances. There is an issue with recruitment nationwide, not just in Hereford and Worcester. Although there has been a significant amount of money spent locally on recruitment initiatives, much more needs to be done to capture the reasons for people leaving, and where possible implement measures to retain staff.

Issues with staffing levels and appliance availability greatly impact the ability to respond to incidents, most significantly resource intensive incidents such as wildfires and floodings. These types of incident, which the draft CRMP acknowledges are likely to occur more frequently due to global warming, strip resources rendering the Service less able to respond and fully resource simultaneous incidents.

As stated above in section 4, Recommendation 17 of the CRMP 2021-2025, following the 2024 Resource Review the 3rd fire engines were removed from Hereford and Worcester fire stations. Although there are retained Firefighters contracted to provide on-call hours during the day at both fire stations they are not being utilised unless required to attend in the Aerial Ladder Platform (or welfare unit at Worcester). This decision needs to be changed. The FBU do not understand why our members are not being sent to incidents when they are contractually obliged to provide cover and they will often be the fastest and best informed crews for local incidents. Despite the removal of the third fire engines from Worcester and Hereford fire stations there will be occasions where, due to the wholtime crews being deployed on the boat for example, that there is a fire engine available but not used.

Recommendation D: The decision to not utilise Hereford and Worcester retained crews on fire engines during the day (between the hours of 07:00 and 19:00) must be altered and the Service must utilise all crews to ensure the communities we serve receive the quickest response.

The two large fires in Kidderminster have been referred to twice already in this report. The first large fire at Betts Metals on 8 September 2021. This incident is shown below:



Figure 12: Betts Metals fire, Kidderminster

The second fire, which is shown on the front page of this report, was at Midland Carpet Distributors and started on 6 December 2021. Both of these incidents were protracted, lasting several days and were resource intensive with the service relying heavily on support from neighbouring Fire and Rescue Services. Following the incident at Betts Metals the FBU raised concerns with the Service regarding the extended time periods Firefighters were in attendance without sufficient welfare / rest provision. The resourcing and use of fire service vehicles and Firefighters at both of these incidents showed that HWFRS was significantly short of personnel and appliance availability. Since 2021 there has been a further reduction of the number of wholtime and retained Firefighters and fire engines. This will only reduce the capability for HWFRS to respond to incidents such as these and will mean that the Service rely more heavily on the crews who are mobilised, expecting them to remain on scene for longer, thus increasing the likelihood of injuries through fatigue. This is an unsustainable model which needs to be changed through significant investment in the frontline.



The consultation document states that, *“Resilience is key to delivering our response strategy and ensuring we can respond across our communities”*. HWFRS have an Urban Search and Rescue (USAR) team available to attend incidents locally and nationally such as unstable or collapsed structures, natural or man-made disasters, and transport incidents. USAR team members take up this role as an extension to their primary contracts with HWFRS. Not only can USAR team members be deployed whilst they are on duty, meaning fire service vehicles will be temporarily unavailable, deployments can last up to 30 days.

The consultation document later states that one of the Service’s aims is, *“Maintaining the core foundation of the Response strategy of availability”*, and that in order to achieve this aim the Service, *“Develop and maintain well-tested contingency plans”*. With a reduced number of personnel HWFRS must ensure that any issues with fire cover can be resolved at the earliest opportunity when USAR teams are deployed, and must also have a long-term strategy for longer-duration deployments, ensuring that fire cover is maintained whilst also giving due consideration to staff welfare.

The consultation document refers to the Community Risk Register but it does not expand on this or adequately cover the points raised within it.

Recommendation E: The document should include more detail of all references including the Community Risk Register and the role of the Local Resilience Forum and specifically the role HWFRS plays in it.



10. Identification of Risk

There is clearly a lot of time invested in the identification and examination of risk in the draft CRMP. This is clearly outlined in the main report and then expanded upon in the eleven supporting documents. However, despite the amount of effort put into this area there is no mention of the two sites classified under the upper-tier Control of Major Accidents and Hazards (COMAH) regulations within Worcestershire. These sites should form part of the HWFRS CRMP, and consideration of the pre-planning and the Service’s response should be evaluated.

It is clear from the data and information provided that the risks identified in the two counties are increasing. The PESTEL analysis identified that, *“Alongside the housing development, there will be an associated increase in local infrastructure, roads and employment sites. With more people, more buildings and more roads, there are likely to be more risks requiring HWFRS intervention through its range of prevention, protection and operational response activity.”* Although worthwhile initiatives, the evidence regarding the number of road traffic collisions on our roads, does not align with the view expressed in the consultation document that *“‘Your Impact’ and road safety campaigns continue to make the roads across Herefordshire and Worcestershire safer places to drive”*. Figure 13.1 below shows the number of RTCs and the increasing trend over the duration of the current CRMP and Figure 13.2 shows the number of injuries and fatalities over the same period.

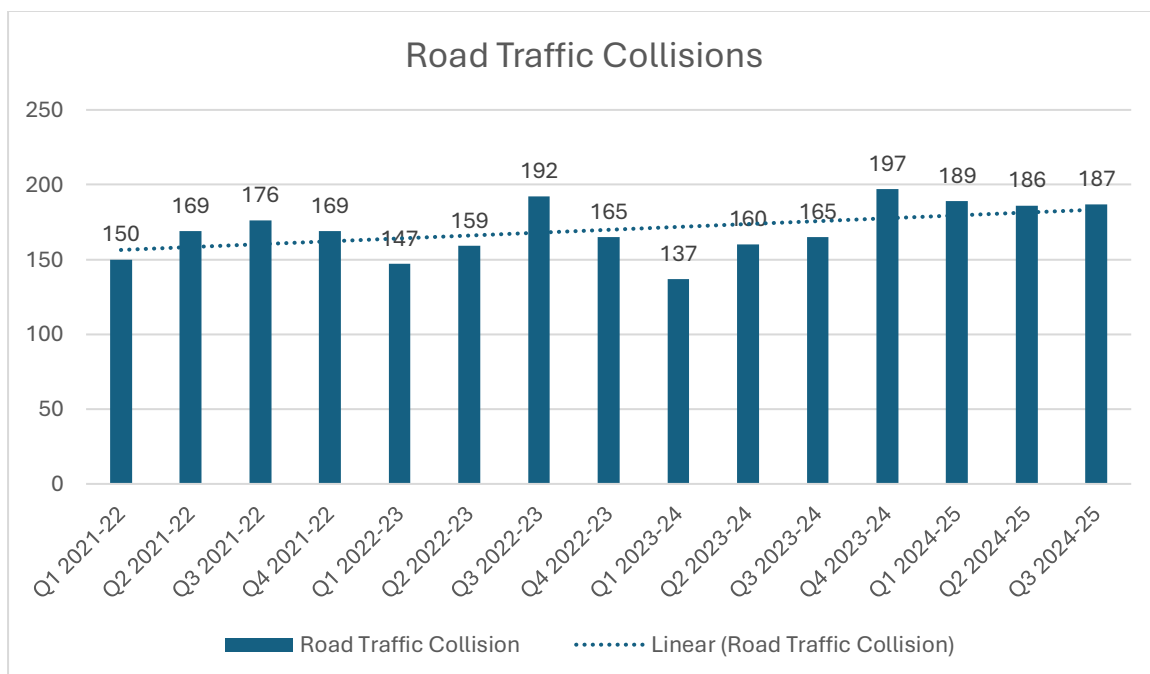


Figure 13.1: Total number of Road Traffic Collisions each quarter during the 2021-2025 CRMP

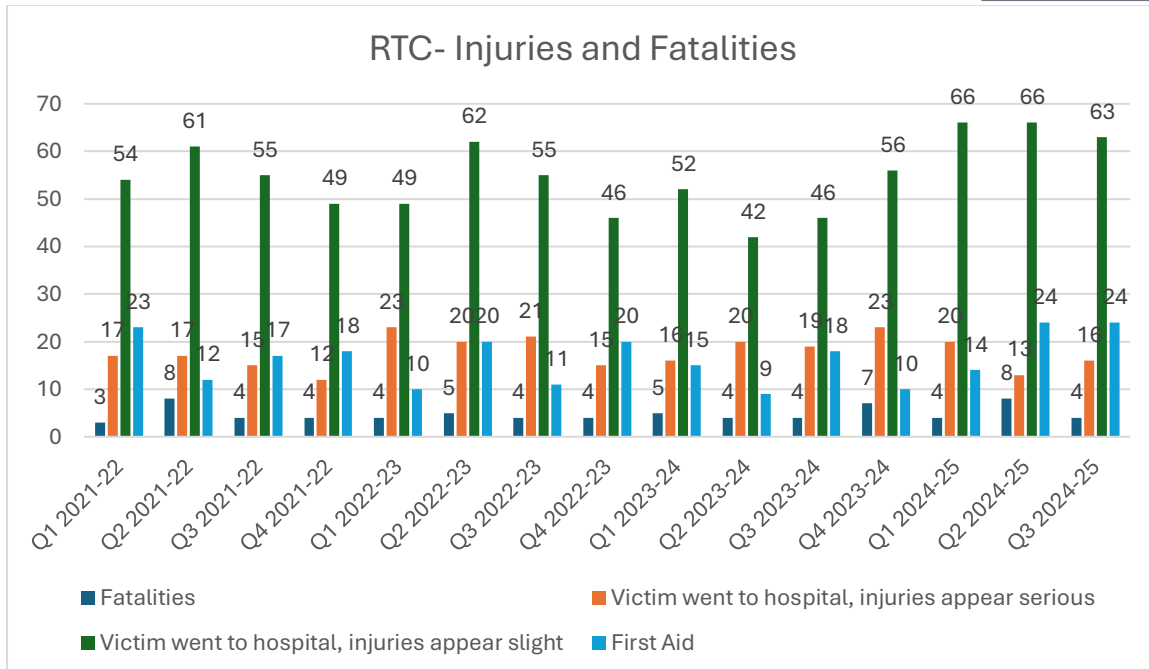


Figure 13.2: Total number of RTC Injuries and Fatalities each quarter during the 2021-2025 CRMP

The draft consultation considers the significant increase in the number of waste fires, rising from 700 in 2021/22 to 1,200 in the following year. Fly-tipping is on the increase and in the year April 2024 – March 2025 there were 451 reports of fly-tipping made to the Worcester City Council. This reflects the overall picture across the two counties, where in the year 2023/24 there were approximately 6,700 reported cases in Worcestershire, and 726 in Herefordshire according to the Department for Environment, Food and Rural Affairs (DEFRA). Not only is fly tipping bad for the environment and wildlife, it also presents significant hazards to Firefighters as the contents of the rubbish is unknown and may contain chemicals, asbestos, needles and biohazards for example.

Like water related incidents, there is no statutory duty for Firefighters to attend Marauding Terrorist Attacks (MTA) incidents. We mention this here because the Service have included MTA in the draft document, however it is important to note that where some Services have signed a collective agreement with the FBU, HWFRS have not. As a result, Firefighters in HWFRS will not respond to MTA incidents.

The document entitled, “Statement of Intent, Definition of Risk, Dwelling fires” which forms part of the consultation material states that, “*Herefordshire and Worcestershire have an aging population and by 2026, the proportion of people aged 65 and over is projected to increase to 209,000, representing more than one in four of the total population (25.9 percent)*”. People aged 65 and over are considered an “at-risk” group, however despite this increasing number of elderly people residing in the two counties HWFRS have already, outside of this process and without taking this information into account, reduced the number of fire engines and Firefighters.



Table 1 in the Equality Impact Assessment consultation document shows where the percentage of the population aged 65+ are based within Herefordshire and Worcestershire. The figures taken from the Office of National Statistics (ONS) mid-2023 estimates show that Malvern Hills at 28.4% has the highest population of this at-risk age group followed by Herefordshire County and then Wychavon (joint with Wyre Forest). As part of the Resource Review HWFRA put in place a review after two years of implementation. One of the original proposals was to remove the second fire engine at Malvern but this proposal was altered part way through the consultation process. It is important to note that the second fire engine at Malvern is strategically placed to respond to all these areas of risk and it is a vital resource during flood conditions due to the inability for vehicles from elsewhere to make their way into Malvern. Therefore, any recommendations made as a result of the two-year Resource Review must be a matter for public consultation.

Recommendation F: HWFRA must consult the public on any recommendations made as a result of the two-year Resource Review.

The document titled “Foreseeable Risk Assessments” states that “*The majority of incidents lasted less than one hour which included 712 false alarms, 74 fires and 29 special service calls*”. It is important to note here that regardless of the length of time, crews’ time will have been well spent responding to these incidents as they will have made an intervention or imparted information / advice.

The Prevention and Protection parts of the draft CRMP contain nothing new. The plan for the five years to 2030 are to continue the work that is currently being done.



11. Incident Trends

When predicting future risks and resourcing needs and requirements a review of past incident trends and activity should be conducted.

Figure 13.1 above shows the number of RTCs and the increasing trend over the duration of the current CRMP. The data for this graph was taken from reports presented to the quarterly Fire Authority Policy and Resources Committee meetings, as was the data for the three graphs below, Figures 14.1, 14.2 and 14.3.

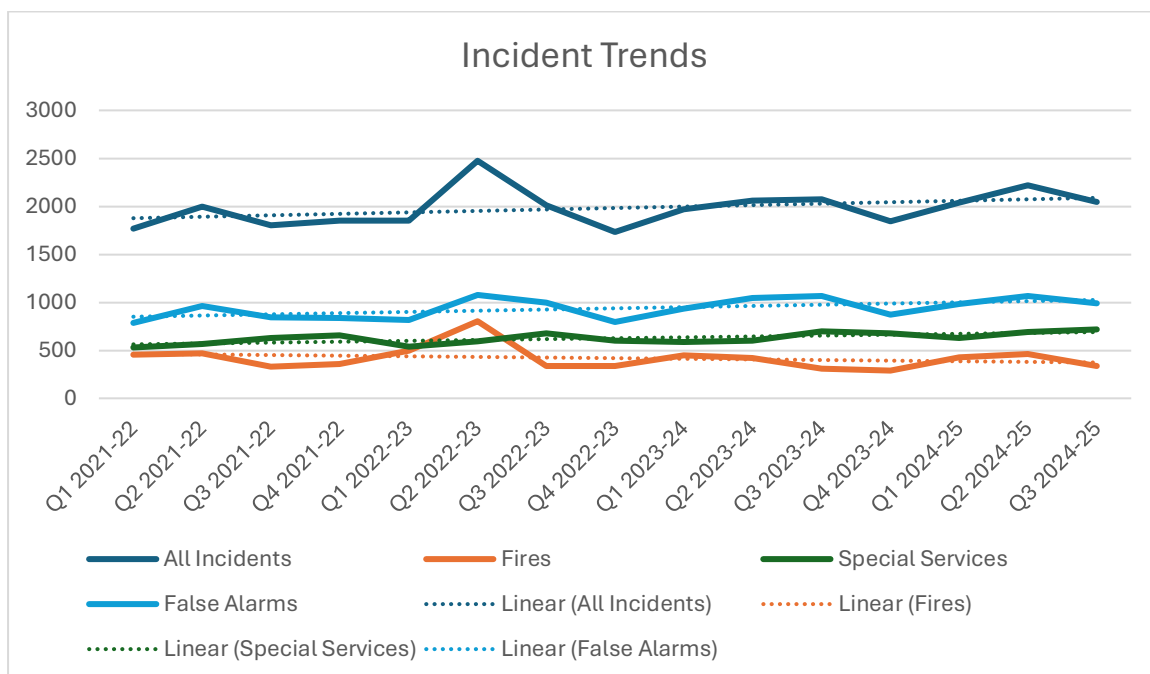


Figure 14.1: Incident Trends Q1 2021-22 to Q3 2024-25

Figure 14.1 above shows how, on average over the duration of the current CRMP cycle (2021-2025) the number of incidents are increasing. The only incident type that is reducing in quantity, on average, each quarter, is Fires.

However, “Fires” includes many different sub-categories which are covered by the terms “Primary Fires” and “Secondary Fires”.

The .Gov website ([Fire statistics definitions - GOV.UK](https://www.gov.uk/government/statistics/fire-statistics-definitions)) gives the following definitions of Primary and Secondary Fires:

Primary fires

Potentially more serious fires that cause harm to people or damage to property. To be categorised as primary these fires must either:



- occur in a (non-derelict) building, vehicle or (some) outdoor structures
- involve fatalities, casualties or rescues
- be attended by 5 or more pumping appliances

Primary fires are split into 4 sub-categories:

- *dwelling fires are fires in properties that are a place of residence that is, places occupied by households such as houses and flats, excluding hotels/hostels and residential institutions; dwellings also includes non-permanent structures used solely as a dwelling, such as houseboats and caravans*
- *other buildings fires are fires in other residential or non-residential buildings; other (institutional) residential buildings include properties such as hostels/hotels/B&Bs, nursing/care homes, student halls of residence; non-residential buildings include properties such as offices, shops, factories, warehouses, restaurants, public buildings, religious buildings*
- *road vehicle fires are fires in vehicles used for transportation, such as cars, vans, buses/coaches, motorcycles, lorries/HGVs; 'road vehicles' does not include aircraft, boats or trains, which are categorised in 'other outdoors'*
- *other outdoors fires are fires in either primary outdoor locations (that is, aircraft, boats, trains and outdoor structures such as post or telephone boxes, bridges, tunnels), or fires in non-primary outdoor locations that have casualties or 5 or more pumping appliances attending*

Purpose-built flat/maisonette fires are split into 3 sub-categories:

- *fires in purpose-built low-rise (one to 3 storeys) flats*
- *fires in purpose-built medium-rise (4 to 9 storeys) flats*
- *fires in purpose-built high-rise (10+ storeys) flats*

Additionally, the relevant data can be found under the 'property type' variable in the [spreadsheet](#) on the [guidance page](#).

Secondary fires

Generally small outdoor fires, not involving people or property. These include refuse fires, grassland fires and fires in derelict buildings or vehicles, unless these fires involved casualties or rescues, or 5 or more pumping appliances attended, in which case they become primary fires.

Although the data in Figure 14.1 shows that the total number of “Fires” reduced over the period of time chosen, Figure 14.2 shows that the number of Primary Fires () recorded for each quarter are on average remaining constant and that it is Secondary Fires that are reducing, bringing down the number of “Fires” when Primary and Secondary Fires are shown together, (as in Figure 14.1).

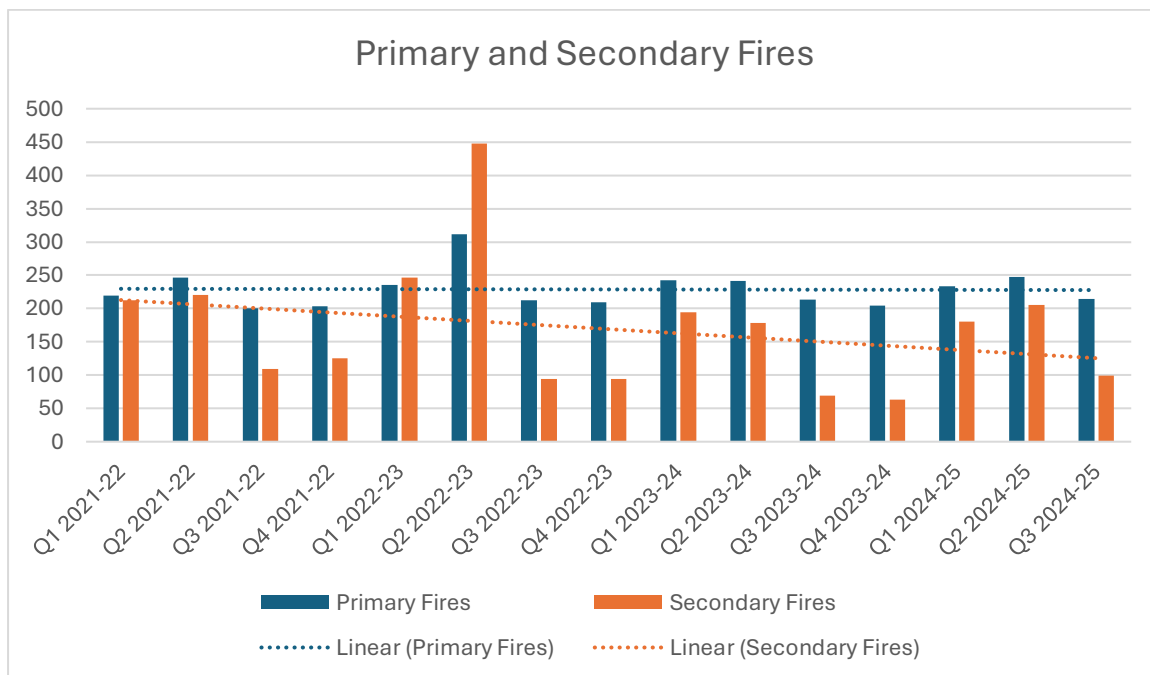


Figure 14.2: Primary and Secondary Fires Q1 2021-22 to Q3 2024-25

Figure 14.1 includes “Special Services” incidents, but as with “Fires” these are also broken down into sub-categories. For transparency these are shown below in figure 14.3.

Recommendation G: HWFRA should provide incident data in a clear and transparent way so that responses to the public consultation can be made taking account of all relevant information.

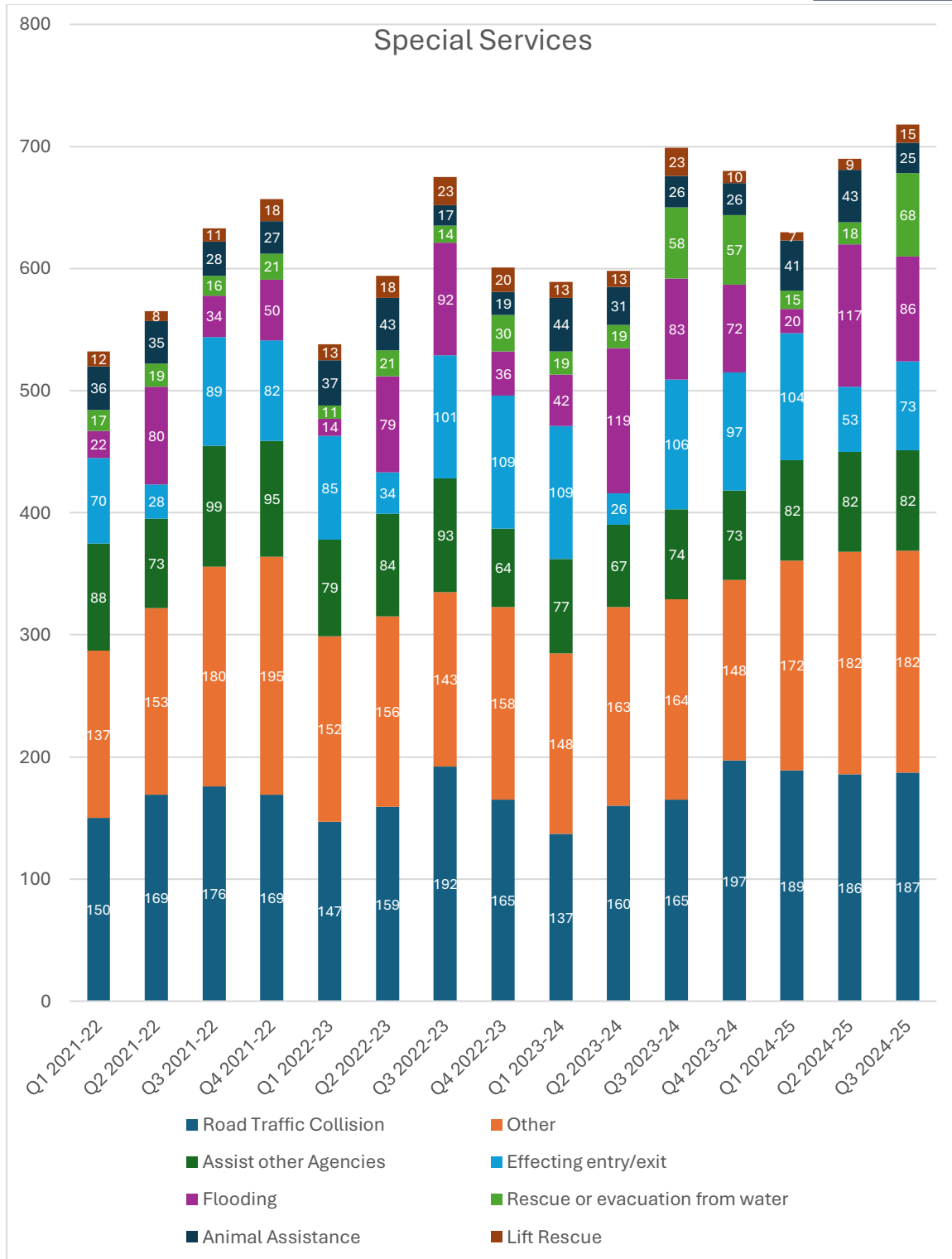


Figure 14.3: Special Incidents Q1 2021-22 to Q3 2024-25



12. Political, Economic, Social, Technological, Environmental and Legal (PESTEL) Analysis

A PESTEL analysis was undertaken as part of the CRMP consultation. Here we will provide some feedback to each of the points of the analysis:

12.1 Political

The “Strategic Understanding of Risk, 2023-24, PESTEL” document refers to The Fire Reform White Paper. The FBU provided a written response to the consultation which can be viewed here: <https://www.fbu.org.uk/sites/default/files/publications/FBU%20submission%20to%20White%20Paper%20consultation%202022%202.pdf>

The FBU response differs to the HWFRS response, highlighting the many flaws of the white paper and overt disappointment at the then Conservative government’s plans after 12 years of austerity and cuts to UK Fire and Rescue Services:

The FBU is extremely disappointed with the White Paper. It contains no direct plans or resources to improve the service fire and rescue provides to the public. It will not solve the building safety crisis exposed by the Grenfell Tower fire. The White Paper is remarkably thin on substance, lacking real ambition and seeks mainly to attack the workforce and the FBU. It is a chief fire officers’ wish list.

Instead of serious investment and professional standards of service, instead of seeking improvement in delivery of service to our communities, it aims to remove the ability for firefighters to shape the service they provide and reduce them to a ‘shut up and do as you are told’ workforce who work longer and still get less. The FBU will engage with ministers and employers over the detailed proposals, but the union’s primary message to ministers is that they must stop and think again: this is not the way to improve our service and profession.

The White Paper is flawed in many respects:

- *It contains no provisions to improve the service firefighters provide to our communities*
- *It promises no new investment in firefighters or equipment needed to improve the service*
- *It threatens the legal rights of firefighters to collectively bargain with our employers over pay, conditions, safety and other vital contractual matters*
- *If implemented, it would cut firefighters’ pay, increase hours, roles and the intensity of work, introduce unsafe practices and all while stretching the service to breaking point*
- *It threatens the right of firefighters to take lawful industrial action when we are attacked by employers and governments*
- *It seeks to give chief fire officers powers to dictate firefighters’ pay, conditions, duty systems, safety and other matters – even though they have no knowledge, training or experience of these matters.*

The White Paper contains some gimmicks, which contribute nothing to the service:



- *It pledges to impose an oath, committing firefighters to do as they are told, put themselves at risk while losing the right to be heard and listened to, negotiated and consulted with*
- *It promises a statutory code of ethics, designed not to improve the service, but instead to make it easier to discipline and sack firefighters.*

The White Paper contains some proposals that the FBU is happy to discuss, subject to ministers providing more clarity on what they might involve. These include:

- *The proposed College of Fire and Rescue*
- *Professional standards for entry and officers*
- *Research and data.*

After highlighting and expanding on these issues the FBU laid out its proposed transformation agenda which included:

- *Westminster-funded investment in the fire and rescue service across the UK*
- *Immediate recruitment of 5,000 new firefighters as a prelude to a wider review to increase establishments*
- *UK-wide service delivery standards developed in collaboration with fire and rescue services and governments in the devolved parts of the UK*
- *A statutory advisory body for the UK, including the FBU in its composition*
- *A publicly-owned Fire Service College with a governance body, reflecting workforce representatives elected by the workforce and the four UK administrations that will utilise the College*
- *A publicly-owned and funded fire research body*
- *Returning the Building Research Establishment to public ownership 17*
- *Restoration of all building control functions to local authority building control*
- *An adequately-resourced and high-quality fire safety inspection regime conducted by trained fire and rescue service specialist fire safety inspectors during all stages of building construction, occupancy and use of all buildings and premises other than individual dwellings.*

The FBU wants central government to state its anticipated improved performance outcomes and how its proposals in the White Paper would meet them. These should include the continuous improvement in:

- *reduction in the number of fires*
- *reduction in the occurrence of other incident types that are the statutory responsibility of fire and rescue services*
- *reduction in the damage caused by fire achieved through early intervention with adequate and safe procedures and sufficient trained crews attending incidents*
- *reduction in call handling time from time of call to dispatch*
- *reduction in the attendance times of the first appliance to arrive*
- *reduction in the attendance times of the second and subsequent appliances to arrive*



- *increased number of fire safety inspections and related activity of buildings, including during the planning and construction phases*
- *reduction in the number of fire deaths and other incidents*
- *reduction in the number of injuries caused at fires and other incidents*
- *improved pay and reward for firefighters*
- *reduction in the number of deaths of firefighters*
- *reduction in the number of injuries caused to firefighters.*

Under the subheading “Terrorism” the consultation document highlights that, “There is concern that the Israel/Gaza conflict could result in self-initiated terrorism”. It is important that members of the public protesting the war on Gaza and the Palestinian people are not confused with terrorists and it is also important to note that the role of Firefighters is to provide a humanitarian service, that the limits of authority do not allow for Firefighters to intervene, and that Firefighters respect the right to protest.

12.2 Economic

The report highlights not just how tight funding is for Fire and Rescue Services but also how inflation is impacting budgetary constraints due to rising costs.

Recommendation H: HWFRS and HWFRA must therefore take every opportunity to lobby for a longer budget period of three years to aid planning and forecasting.

The report paints a depressing and sobering picture of the state of the country in the wake of Liz Truss’s mini budget, post Brexit climate handed down after 14 years of Tory rule. It further highlights a worsening situation with regards to an increased rate of fuel poverty and a higher number of households affected (14,145 (17%) households in Herefordshire and 37,469 (15%) households in Worcestershire), using the government’s Low Income Low Energy Efficiency (LILEE) indicator. In 2023 West Midlands region had the highest rate of fuel poverty in England (19.5% of households compared with 13.0% for England) which included 14.4% of households in Worcestershire and 28% of households in Herefordshire. Depressingly, this shows a further increase in risk – risk that Firefighters will be responding to.

The document quotes ONS figures that continue to show that annual pay growth rates for the public sector remain below those of the private sector and raises concern that HWFRS may not be able to recruit and retain staff as private sector salaries become more competitive and attractive. The document infers that this is likely to affect Retained staff more than Wholetime. We disagree with this position – the FBU have fought over many years to achieve parity for our members and as a result terms and conditions have been aligned. Although as a result of further FBU campaigning recent pay increases have been more significant, all Firefighters regardless of the duty system they work have felt the squeeze after pay stagnation and real terms pay cuts. This impact can be seen in Figure 3 above.



Other factors that the consultation document does not consider but should be included in the final version are:

Levels of unemployment – According to the ONS, levels of unemployment in Herefordshire and Worcestershire increased in 2020 and 2022 but is improving and decreased in 2023 (4.4%) compared to 2022 (4.6%).

Benefit claims (such as Housing, Fuel, Incapacity / Universal Credit / Income Support / Disabled Living Allowance) – A report published by the House of Commons Library reports a substantial increase in the number of people claiming unemployment related benefits raising by 203,000 between February 2024 and February 2025. Locally there was a 23% increase in Herefordshire and an 8% increase in Worcestershire during this period.

Foodbank usage – The Trussell Trust and other organisations report a significant increase in demand and usage.

Recommendation I: HWFRS should include all foreseeable risks and factors in the final CRMP document.

12.3 Social

According to the Equality Impact Assessment and PESTEL analysis, the 2021 Census recorded a combined population for the two counties of 790,700 (Herefordshire = 187,000 and Worcestershire 603,700) and that the population is projected to increase by 44,000 (5.6%) by 2031 (81% of this total increase will be people aged 65 years and over). The PESTEL analysis states that, *“Alongside the housing development, there will be an associated increase in local infrastructure, roads and employment sites. With more people, more buildings and more roads, there are likely to be more risks requiring HWFRS intervention through its range of prevention, protection and operational response activity.”*

Recommendation J: HWFRS needs to ensure that its response model is fit for the future and that it can respond to the increasing risks.

The PESTEL analysis adds further detail on the rising numbers of people in at-risk age groups:

“Around a quarter (26%) of the total resident population of Herefordshire is aged 65 or over compared with 19% for England and Wales. The number of older people is projected to grow at a higher rate than younger age groups. There is also a higher proportion of adults in the older working age group (mid-40s to 64 years old) than younger working age adults (age 16 to the mid-40-year-olds). At the same time there is a lower proportion of children in Herefordshire compared with nationally (16% against 19%), and numbers have fallen.”

“The 2021 Census for Worcestershire recorded around 138,000 persons aged 65 or over (about 23%). Proportions in the local authority districts ranged from particularly high levels of people aged 65-plus in Malvern Hills district (28%) to less than 18% in Worcester. As with Herefordshire, the number of people aged 65-plus is expected to grow at a higher rate than younger age groups.”



“While age is a factor in relation to fire risks, it is also a contributory factor to many health-related risks. For example, it needs to be considered alongside issues such as poor mobility, frailty, poor mental health and other cognitive impairments. There are also other behavioural characteristics, which are not necessarily age-related, such as smoking, drug and alcohol use, which also increase an individual’s risk.”

As mentioned in Section 4, “Review of Recommendations to 2021-2025 CRMP” under recommendation 26, HWFRS continue to use Graded Response. Incidents considered medium risk will receive a prompt response meaning that crews will respond at road speed using none of the exemptions available to emergency service vehicles. One such example is a vehicle leaking fuel. The figures provided in the document entitled, “Strategic Understanding of Risk, Incident Type – Demand” states that in the five year period from 1 April 2019 to 31 March 2024, 115 people were rescued, 673 people sustained injuries and 8 people died at these incident types. Clearly there is a need to review the Graded Response policy, taking into account these statistics and the increasing risks to the communities we serve.

With the increased numbers of people living in the two counties, and with them the additional risks of housing stock, roads, and traffic – all of which will lead to more incidents for HWFRS to attend to, it will also increase the income for the Service through council tax and business rates.

Recommendation K: HWFRA need to assure itself that the public are receiving good value for money.

The current view, after cuts following the Resource Review is that the public are paying more but getting less in terms of the speed (attendance times) and weight (number of fire engines and Firefighters) of response.

12.4 Technology

The PESTEL analysis refers to the worldwide WannaCry ransomware attack in May 2017 that severely disrupted more than 80 (out of 236) hospital trusts across England, leading to 19,000 appointments being cancelled across the one-week period of the attack. The report also refers to the investigation that followed this cyber attack but gives no detail. The investigation highlighted a number of lessons learnt which HWFRS should reflect on to ensure IT systems are as secure as possible:

NHS Digital told us that all organisations infected by WannaCry shared the same vulnerability and could have taken relatively simple action to protect themselves. All NHS organisations infected by WannaCry had unpatched or unsupported Windows operating systems so were susceptible to the ransomware. However, whether organisations had patched their systems or not, taking action to manage their firewalls facing the internet would have guarded organisations against infection. NHS Digital told us that the majority of NHS devices infected were unpatched but on supported Microsoft Windows 7 operating systems. Unsupported devices (those on XP) were in the minority of identified issues. NHS Digital has also confirmed that the ransomware spread via the internet, including through



the N3 network (the broadband network connecting all NHS sites in England), but that there were no instances of the ransomware spreading via NHSmail (the NHS email system).

There was no clear relationship between vulnerability to the WannaCry attack and leadership in trusts. We found no clear relationship between trusts infected by WannaCry and the quality of their leadership, as rated by the Care Quality Commission.

The NHS has accepted that there are lessons to learn from WannaCry and is taking action. Lessons identified by the Department and NHS national bodies include the need to:

- *develop a response plan setting out what the NHS should do in the event of a cyber attack and establish the roles and responsibilities of local and national NHS bodies and the Department;*
- *ensure organisations implement critical CareCERT alerts (emails sent by NHS Digital providing information or requiring action), including applying software patches and keeping anti-virus software up to date;*
- *ensure essential communications are getting through during an attack when systems are down; and*
- *ensure that organisations, boards and their staff are taking the cyber threat seriously, understand the direct risks to front-line services and are working proactively to maximise their resilience and minimise impacts on patient care.*

Recommendation L: HWFRS should review the lessons learnt from the WannaCry ransomware attack to ensure its IT systems are as secure as possible.

Under the subheading “Artificial Intelligence (AI) – potential in the fire and rescue service” the PESTEL analysis highlights the “*potential for AI technologies to revolutionise the fire and rescue service by providing more efficient, proactive, and accurate solutions for emergency preparedness, response, and recovery*” it points to the importance and value of the role Firefighters play. “Ultimately, while AI can significantly augment the capabilities of emergency services, it should not replace human judgement and expertise. Trust in AI systems for life-saving situations should be established through a combination of rigorous testing, transparency, human oversight, and a commitment to continuous improvement and ethical use.” AI should be used to improve the role of Firefighters and to assist them to fulfil their role, not replace or justify a reduction in numbers.

The PESTEL analysis highlights the move towards electric vehicles (EVs) as part of the government’s plans for net zero emissions. Although the risk is changing this is gradual, (EVs represent 1 out of every 32 (4.15%) vehicles on our roads), and the risks of traditional fuels and internal combustion engines still exist. EVs present their own unique hazards and in the event of a fire they can be extremely difficult to extinguish. In March 2022 a bus depot in Bromsgrove (Figure 15) lost a number of EVs due to fire. A phenomenon known as ‘thermal runaway’ occurs in EV batteries, where due to the cells being damaged or faulty they generate and self-sustain an increase in temperature, potentially leading to fire, explosion, and the release of toxic gases.



Figure 15: Fire at Bromsgrove bus depot

EVs primarily use lithium-ion batteries – these types of battery are also used in a range of household appliances which when disposed of with household waste can be crushed in bin lorries or damaged, leading to a fire. According to research undertaken by ‘Material Focus’ published in May 2024 “1.6bn batteries were thrown away in the previous year, equating to over 3,000 per minute – including over 1.1bn electricals containing hidden lithium-ion batteries. Battery fires in bin lorries and at waste sites in the UK have reached an all time high – over 1,200 in the last year, an increase of 71% from 700 in 2022.”

Fires at waste recycling plants can burn for weeks or months. They are resource intensive and require a high number of Firefighters and fire engines to resolve.

Another example of an increasing risk are Battery Energy Storage Systems (BESS) sites. As the PESTEL analysis identifies, there is currently one BESS site currently operating in Herefordshire with several others awaiting construction or in planning.



Figure 16: Fire at BESS site, Liverpool - 2020



12.5 Environmental

The three bullet points on page 32 of the PESTEL analysis taken from the National Risk Register all identify areas of concern to fire and rescue services and detail how risks are forecast to increase:

- *More intense rainfall and wetter winters will increase the likelihood of more fluvial (river, stream, brook, etc.) and surface water flooding (when rainfall overwhelms the capacity of drainage systems and surface water sewers). This may lead to widescale and localised flooding events, with the risks associated with rescue from water and breaches of flood defences.*
- *Hotter summers will increase the likelihood of the risk of wildfires, leading to more forestry, grassland and other outdoor fires. The frequency and intensity of such fires may also change as the wildfire season is likely to extend beyond the late spring period into the summer months. This can have a significant impact on the ability to extinguish fires using conventional methods. Early season outdoor fires tend to be surface fuels, such as grasses and heathers, as they are drier than material below the surface, and can be dealt with by conventional equipment. As the season extends into the hotter summer months, firefighting can become more difficult as not only surface fuel burns, but also sub-surface fuels. This may result in larger wildfires and will require more specialist equipment and firefighting tactics and resources.*
- *More extreme heat with higher temperatures during heatwaves is likely to increase. This is likely to have an adverse impact on community health and will also affect wildlife and vegetation through water shortages and longer periods of drought. Heatwaves also tend to be followed by other hazards such as severe thunderstorms and poor air quality.*

As mentioned above regarding waste recycling fires, these incidents caused by adverse weather conditions are resource intensive and require a turn-over of crews to resolve the incident as safely as possible. Firefighters that have not had adequate time to recover are more likely to sustain injuries and will not be able to perform at their highest level.

It is also true to say that simultaneous incidents, where we see a coming together of a number of factors, overstretch Service resources including personnel. For example, there are still road traffic collisions and building fires in flood or wildfire season.

Recommendation M: HWFRS must assure itself and reassure the public that it is able to respond to, and adequately resource, multiple large scale incidents.

The PESTEL analysis identifies the potential for pandemic and emerging infectious diseases including avian influenza. There was a delay in the Service informing staff after a recent outbreak of bird flu in Worcester and it was the local FBU officials who informed Service management.

Recommendation N: HWFRS needs better links with The Department for the Environment, Food and Rural Affairs (DEFRA) and The Animal and Plant Health Agency (APHA) to ensure that staff are informed about outbreaks of infectious diseases at the earliest opportunity.



Page 34 of the PESTEL analysis lists a number of key infrastructure developments. This list should also include communication networks, such as Pylons, Satellite dishes, 5G masts, Emergency Service communication networks.

At the top of page 35 of the PESTEL analysis there are 2 bullet points:

- Building construction and cladding methods – eg thatched, timber-framed
- New construction materials – eg composite fencing and decking material

After the Grenfell Tower fire, Aluminium Composite Material (ACM) rainscreen cladding should be listed here.

Recommendation O: HWFRS should review the findings of all fires where lives have been lost to determine whether additional materials attributed to those incidents should be added to the list and relevant policies / guidance / training updated accordingly.

12.6 Legal

The PESTEL analysis refers to Collaborative arrangements. The 2021-2025 CRMP explained that HWFRS had embarked on a new Fire Alliance with Shropshire Fire and Rescue Service (Shropshire FRS), which aimed to give the Service more collective capacity and resilience to achieve longer-term sustainability for both Services. To facilitate this strategic alliance the HWFRA 2014-2020 CRMP was extended by one year to cover the period up to April 2021, after which the new CRMP and Shropshire FRS's Integrated Risk Management Plan (IRMP) were jointly implemented. On 1 November 2024 Shropshire FRS opened their public consultation for the draft CRMP 2025-2028. Despite the strategic alliance remaining in place and the original decision to align the CRMP cycle with Shropshire FRS there is no explanation within the HWFRA draft CRMP, including any of the supporting documents, as to why the decision was made to desynchronize the two Service's CRMPs.

Recommendation P: HWFRS should make clear in the consultation document the reasons to desynchronize the CRMP with Shropshire FRS.

The final page of the PESTEL analysis refers to the Strikes (Minimum Service Levels) Act 2023. It is important to note that on 6 August 2024 the government announced that it will repeal the Act.



13. Inaccuracies / Errors

It is disingenuous to say that HWFRS attends around 7,000 incidents each year. Although the annual figures range from 6,112 to 8,137 over the last ten years, over the duration of the current CRMP the number of incidents attended is significantly higher. Discounting the figure for the year 2024/25 as that will not be known until after the close of this public consultation, (however the projection is that the total number of incidents attended will be more than in 2023/24, because the Quarter 1 report showed an increase of 4% in comparison to Quarter 1 2023/24; the Quarter 2 report showed an increase of 7% in comparison to Quarter 2 2023/24, however the Quarter 3 report showed a decrease of 2% in comparison to Quarter 1 2023/24), the average total comes to 7,655. Strangely, the HWFRS website states that the Service responds to approximately 6,600 incidents a year.

The Service Structure shows an Assistant Director of Assets post which has been removed from the structure.

The consultation document gives conflicting information about the population of the two counties, ranging from 790,700 (page 21) to 798,000 (page 19). Similarly, page 19 states that there are 342,800 households whereas page 35 states that there are 342,700.

There has been significant investment in training and equipment for Firefighters so that they can respond to water incidents with a higher level of personal protection (PPE) as Water First Responders. The consultation document is misleading where it states that this provides “the fastest response possible”. This provides options should there be a need to enter some (not all) water conditions, and as already stated, a higher level of personal protection. However, there is no advantage in terms of how quick those crews are able to respond because of that training and equipment.

Page 75 of the consultation document has two charts (a bar chart and a pie chart) illustrating the number of business owners who felt that their business was better protected from fire following the fire service visit. It is not clear why there is a discrepancy between figures shown on the two charts as they illustrate the same results.

On pages 30, 31 and 37 of the “Strategic Understanding of Risk, 2023-24, PESTEL” document there appear to be four notes-to-self that the author left in place:

1. At the end of the bottom of the information under the heading “Battery Energy Storage Systems (BESS)” it states, *“There is also specific operational training and guidance for all firefighters – evidence?”*
2. The final paragraph on page 30, under the heading “Solar panels” states, *“Does HWFRS have a policy/guidance/training in relation to solar PV on rooftops and solar farms? Do we have intel plans of specific sites at potential risk that include solar farms?”*
3. On page 31 at the end of the first paragraph under the heading “Domestic Energy Storage Systems (DESS)” it states, *“It will be important to ensure that the Service’s Site-Specific Risk Information is up to date”.*
4. The final paragraph on page 37, under the heading “Terrorism (Protection of Premises) Bill 2023” states, *“How many premises and public events would this apply to in H&W?”*



Recommendation Q: HWFRS should undertake a review of all policies/guidance/training to ensure that all areas of risk identified in the PESTEL analysis are covered.

Recommendation R: HWFRS should undertake a review of all Site Specific Risk Information to ensure that it accurate, current, and accessible.

Recommendation S: HWFRS should review all known premises and public events to ensure compliancy with Martyn's Law which received Royal Assent on 3 April 2025.

Page 13 of the document titled "Foreseeable Risk Assessments" quotes the duration of an incident up to the time that a stop message was given. Similarly, a sentence on page 25 states, "*On average, a barn fire incident took 8-hours to close from the time of the emergency call to the time the incident was stopped*". This is misleading terminology because the document gives this detail on the assumption that a stop message signifies the end of an incident, however this is not the case. Crews and fire appliances can remain on scene for several days after a stop message is sent.

Recommendation T: HWFRS need to revise the figures in the report to ensure they are correct and give clarification on the terminology of the status messages that they are providing to the public as part of the CRMP consultation.



14. Valuing the Workforce

There is a section in the report titled “Valuing our Workforce” that highlights the HMICFRS inspection area, “Promoting the right values and culture”.

HWFRA members are regularly updated on the amount and reasons for absenteeism. Figure 17 below illustrates the data from the quarterly reports and concerning shows how there has been a gradual increase over the duration of the current CRMP. The top 3 reasons for absence are shown above in Section 4, Review of Recommendations to 2021-2025 CRMP, Figure 1.

Recommendation U: HWFRS must look at the reasons for absence and commit to addressing the causes.

Recommendation V: HWFRS must explore options to put in place regular monitoring for cancers.

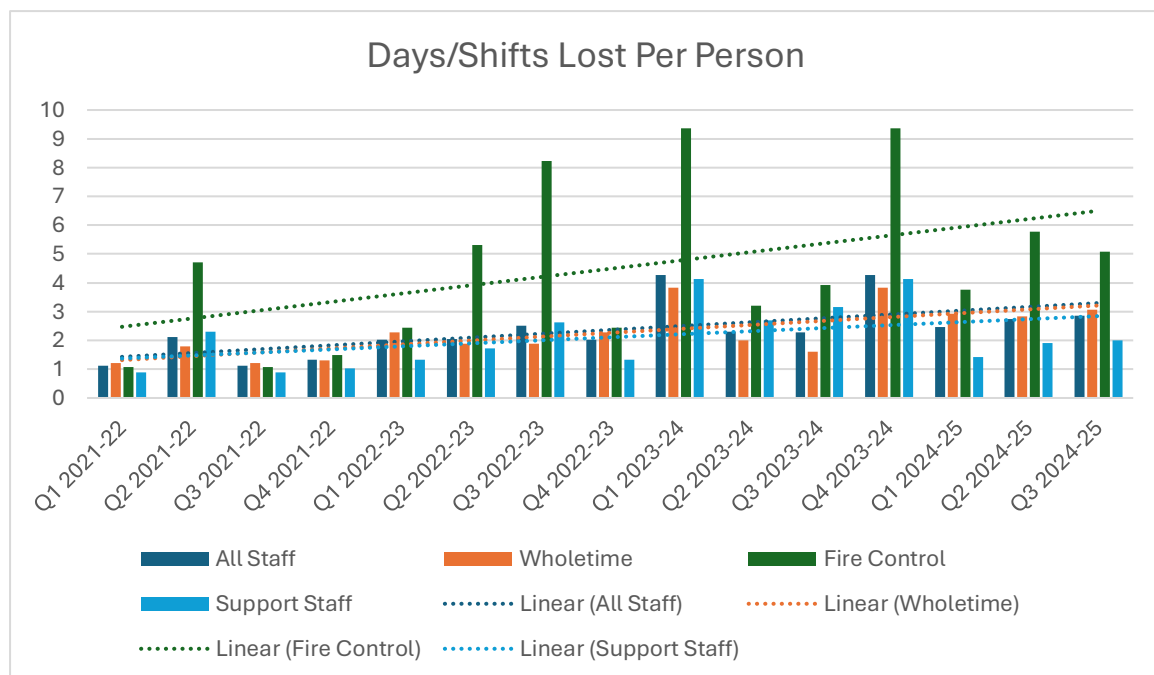


Figure 17: Days/Shifts Lost Per Person

The table below (Figure 18) shows the results of a Freedom of Information request, submitted in November 2024 asking the following questions:

1. In the last three years, how many members of staff have taken at least one day off work due to mental health? (Broken down by years: 2021/22, 2022/23 and 2023/24)
 - 1a) Can you provide a breakdown of specific mental health reasons/conditions for example, anxiety, stress, depression, PTSD, work-related stress? (Broken down by year)



1b) Of those that had taken time off due to mental health, how many subsequently left the service?
Broken down by year.

Year	Number of Employees who have had sickness absence due to mental health	How many have left the Service	Reason Given	Number
2021/2022	29	13	Anxiety	7
			Depression	7
			Stress	13
			Post Trauma	1
			Other	1

Year	Number of Employees who have had sickness absence due to mental health	How many have left the Service	Reason Given	Number
2022/2023	35	13	Anxiety	4
			Depression	4
			Stress	23
			Other	4

Year	Number of Employees who have had sickness absence due to mental health	How many have left the Service	Reason Given	Number
2023/2024	51	12	Anxiety	6
			Depression	4
			Stress	31
			Post Trauma	1
			Other	9

Figure 18: Response to FOI 325 11 24

These shocking figures were covered in the press: [Rise in fire service staff taking time off for mental health | Worcester News](#). In summary, the figures show that:

- Almost double the number of fire service staff are taking time off due to mental health issues than two years ago.
- In the last three years, 115 staff from the fire service have taken at least one day off due to mental health.
- Twenty nine staff absences were recorded due to mental health reasons between April 2021 and March 2022 including 13 of those being due to stress.
- In the following 12 months, the number rose to 35 and between April 2023 and March 2024 the number rose again to 51 - a 76 per cent rise in two years.
- Of the 51 absences in 2023/24, 31 were for stress, six for anxiety, four for depression and nine were labelled as 'other mental health'.



- Forty-five per cent of staff that took time off in 2021/22 have since left the service, with 37 per cent and 24 per cent of staff who took time off in 2022/23 and 2023/24 also leaving the service.

Figure 10 above shows that there are less operational staff in HWFRS, however with a wider range of incident types including gaining entry and assisting West Midlands Ambulance Service, those fewer numbers of personnel are likely to witness more traumatic events than they used to. This will inevitably lead to a continuation in the increased number of absences due to stress.

Further on the report highlights the HMICFRS inspection area, “Getting the right people with the right skills”. A number of our retained members were successful in the 2023 Wholetime Firefighter recruitment process and were put on a holding list. These members were informed that the list would remain in place for 2 years, however despite this assurance the Service wrote to them after just 18 months to inform them that the list would be disbanded but encouraging those members to apply in the next process in the latter part of 2025. This message disenfranchised those keen and committed members of staff and could have been avoided by simply extending the duration of the holding pool by 3 months or so rather than closing it 6 months early.

Over the duration of the current CRMP the FBU have submitted several Failure to Consult / Failure to Negotiate / Failure to Agree letters to the Chief Fire Officer. These letters are for a range of reasons covered in our members’ terms and conditions and legislation including the Trade Union and Labour Relations (Consolidation) Act 1992 such as:

- changes to policies that directly impact our members’ Terms and Conditions
- amendments made to Written Statement of Employment Particulars
- a reduction of Grey Book (operational) posts
- the use of a questionnaire to negate the requirement to formally negotiate with the FBU

HWFRS recently downgraded the Service provision for animal rescue, unilaterally taking the decision to remove the equipment from Pershore fire station on 21 March 2025 without any consultation with the station, our members or their union.

Recommendation W: HWFRS must ensure formal consultation and negotiation processes take place in all circumstances.



15. Recommendations

Throughout our response we made the following recommendations:

Recommendation A: HWFRS and HWFRA must take every opportunity to lobby government for a statutory duty for FRs in England to respond to flooding events and work with the FBU in doing so.

Recommendation B: HWFRS should consider and act upon all recommendations in the GTI reports.

Recommendation C: HWFRS must review the Crew Carrier guidance document and consult with the FBU on it, including the vehicles issued to stations to ensure the guidance and vehicles are fit for purpose.

Recommendation D: The decision to not utilise Hereford and Worcester retained crews on fire engines during the day (between the hours of 07:00 and 19:00) must be altered and the Service must utilise all crews to ensure the communities we serve receive the quickest response.

Recommendation E: The document should include more detail of all references including the Community Risk Register and the role of the Local Resilience Forum and specifically the role HWFRS plays in it.

Recommendation F: HWFRA must consult the public on any recommendations made as a result of the two-year Resource Review.

Recommendation G: HWFRA should provide incident data in a clear and transparent way so that responses to the public consultation can be made taking account of all relevant information.

Recommendation H: HWFRS and HWFRA must therefore take every opportunity to lobby for a longer budget period of three years to aid planning and forecasting.

Recommendation I: HWFRS should include all foreseeable risks and factors in the final CRMP document.

Recommendation J: HWFRS needs to ensure that its response model is fit for the future and that it can respond to the increasing risks.

Recommendation K: HWFRA need to assure itself that the public are receiving good value for money.

Recommendation L: HWFRS should review the lessons learnt from the WannaCry ransomware attack to ensure its IT systems are as secure as possible.

Recommendation M: HWFRS must assure itself and reassure the public that it is able to respond to, and adequately resource, multiple large scale incidents.

Recommendation N: HWFRS needs better links with The Department for the Environment, Food and Rural Affairs (DEFRA) and The Animal and Plant Health Agency (APHA) to ensure that staff are informed about outbreaks of infectious diseases at the earliest opportunity.



Recommendation O: HWFRS should review the findings of all fires where lives have been lost to determine whether additional materials attributed to those incidents should be added to the list and relevant policies / guidance / training updated accordingly.

Recommendation P: HWFRS should make clear in the consultation document the reasons to desynchronize the CRMP with Shropshire FRS.

Recommendation Q: HWFRS should undertake a review of all policies/guidance/training to ensure that all areas of risk identified in the PESTEL analysis are covered.

Recommendation R: HWFRS should undertake a review of all Site Specific Risk Information to ensure that it accurate, current, and accessible.

Recommendation S: HWFRS should review all known premises and public events to ensure compliancy with Martyn's Law which received Royal Assent on 3 April 2025.

Recommendation T: HWFRS need to revise the figures in the report to ensure they are correct and give clarification on the terminology of the status messages that they are providing to the public as part of the CRMP consultation.

Recommendation U: HWFRS must look at the reasons for absence and commit to addressing the causes.

Recommendation V: HWFRS must explore options to put in place regular monitoring for cancers.

Recommendation W: HWFRS must ensure formal consultation and negotiation processes take place in all circumstances.



16. Conclusions

The FBU support the aims HWFRS and HWFRA have set but do not agree with the approach taken by undertaking a Resource Review prior to the CRMP. As stated throughout this response to the CRMP consultation, and in our response to the Resource Review consultation, the decision to cut appliances from the Service's fleet was taken without any consideration of the increasing risks that have been identified through the CRMP. We therefore recommend reversing some of these cuts, namely at Hereford and Worcester fire stations and utilise all available retained crews regardless of the time of day, essentially reversing the decision not to use the retained personnel between the hours of 07:00 and 19:00.

We note that as part of the consultation process HWFRS presented the CRMP to members of the public at public forums where just 30 people attended. Public consultations in the past have attracted very small numbers of responses and cannot be seen to reflect the overall public view. Furthermore, it is concerning that the report states, "a report with options for future efficiencies will be brought forward for consideration at a future date". Any proposed cuts or "redistributions of funds" should have been made clear in the CRMP, and any future proposals must be a matter for public consultation and therefore not implemented beforehand on the weight of response to this current consultation process.

In total we have made 21 recommendations in our response to the 2025-2030 CRMP consultation. These should be considered alongside the 28 recommendations we made to the 2021-2025 CRMP as they remain relevant.

The FBU has always sought to work constructively and positively with HWFRS and this stance will continue.

**FIRE
CUTS COST
LIVES!**

