



15 September 2025

## **Hereford & Worcester Fire Authority's Formal Response to:**

### **Hereford and Worcester Fire Brigades Union Response to the Hereford & Worcester Fire and Rescue Service Draft Community Risk Management Plan 2025-30**

The Hereford & Worcester Fire Authority (FRA) thank the Fire Brigades Union (FBU) for its response to the draft Community Risk Management Plan (CRMP) 2025-30 as part of the public consultation process. The FBU's response to the draft CRMP 2025-30 has been considered carefully and, where appropriate, amended and included in the final version of the CRMP 2025-30. However, from the outset, the FBU's response makes numerous references to the Resource Review which was agreed and signed off by the FRA on the 26 June 2024. The FRA provided an extensive response to the points raised previously by the FBU and as such, to avoid repetition, we will not directly be addressing any of the points or recommendations which reference the Resource Review in this response. Similarly, the CRMP is above all an assessment of risks and our measures to mitigate them, not a financial appraisal and therefore, any points and recommendations referring to government funding or 'cuts' will again not be directly addressed in this response document.

This document will address, where relevant, not only the 23 recommendations for the draft CRMP 2025-30, but also re-address the previous 28 recommendations for the current CRMP 2020-25, as well as providing some explanation for some of the concerns raised in the FBU response.

## **1. Introduction**

The introduction of the FBU's response rightly identifies that the Integrated Risk Management Planning (IRMP, now called CRMP) process has evolved since 2004 from annual plans to higher-level strategic documents. It states that they now '*cover longer periods and are vaguer, addressing wider-ranging aspirational ideas with a view to leaving options open for Fire and Rescue Services (FRSs) to refine proposals at a later date*'. It goes on to suggest that Hereford & Worcester Fire and Rescue Service's (HWFRS) draft CRMP is 'bereft' of plans to mitigate risk and that '*every Service is guilty of travelling this path toward vagueness*'.

What this fails to appreciate is that the purpose of a strategic document is to set out the high-level direction of the Service (following the guidance for CRMPs issued by the National Fire Chiefs Council (NFCC)), whilst the detailed plans on how the CRMP will be delivered sit within the Service's Core and Enabling Strategies that deliver a CRMP's strategic direction and are meticulously road-mapped in Business Planning and the Medium-Term Financial Plan.

It should be noted that the draft CRMP has been formulated following extensive research of the current and future risks facing both communities of Herefordshire and Worcestershire and the Service. This research sits within the supporting documents of the draft CRMP. It is recommended that the FBU review the CRMPs of other FRS to assess and compare the extent of detailed planning.

The third paragraph finishes by providing a broad brushstroke of global politics and the socio-economic implications of the wars in Europe and the Middle East. The FRA would like to provide assurance to the FBU that it is across these issues and other risks in the National Risk Register and, whilst they are referenced in the 70-page Strategic Understanding of Risk document, that the CRMP is not the arena in which to analyse them in any great depth.

The Executive Summary appears to speak to previously well documented national FBU points around funding, cuts and putting more Firefighters on more fire engines. It does not refer to any of the content of the actual public consultation in the Hereford and Worcester FRA document and fails to provide a summary of what the reader can expect from the rest of the document. Notwithstanding this, this FRA document will address the 28 recommendations made regarding the current CRMP and the further 23 recommendations for the CRMP 2025-30. For the sake of brevity, some of the previous recommendations are dealt with by referencing the current CRMP and, as previously stated, any recommendations referring to the Resource Review, cuts or funding will not be addressed in this document.

## **2. Hereford & Worcester Fire Authority's Formal Response to the FBU's Previous Recommendations (1-27) to CRMP 2021-25**

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

The Valuing Our Workforce section of the CRMP 2025-30 clearly lays out a strategic aim to maintain a healthy workforce. There is a detailed section on Welfare and Staff support which signposts support functions such as the Critical Incident Support Team (CIST), our mediation service (MILE), various staff networks, and the support provided by the Fire Fighters Charity. HWFRS have also recently launched the new Back Up Buddy app and are committed to supporting all members of staff's physical and/or mental wellbeing at work or at home.

The Service has a range of internal policies and procedures in place to support the mental health and wellbeing of its workforce. These are regularly reviewed and updated to ensure they remain relevant and effective.

HWFRS has also recently won an award at the Chamber of Commerce Business Awards in the Health and Wellbeing in the Workplace category.

**FBU 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 CRMP 2025-30 follows closely the NFCC's CRMP Framework and risk methodologies, widely regarded as best practice.

**FBU 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.*

The Operational Policy department ensures business continuity and emergency planning measures are in place to address foreseeable risks. Hereford & Worcester Fire Authority (FRA) work closely with the Local Resilience Forum (LRF) and engage in regular exercises to provide assurance that we are prepared. For the first time, a Foreseeable Risk section has been included in the draft CRMP which serves to address risks which are not necessarily highlighted by data analysis.

**FBU 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.*

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

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

As part of the government's fire reform agenda The Fire Standards Board was officially formed in 2019. The Board's role is to identify, organise, develop, and maintain professional standards for FRSs in England. It is an independently chaired body with members from various organisations like the NFCC and the Local Government Association. The Board develops standards that provide a benchmark for what is expected of FRSs and how they should meet those expectations. HWFRS sits on the National Fire Standards working group and is committed to delivering our work in-line with the standards.

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

This recommendation references the Service's Resource Review in 2024 and has been addressed separately.

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

**FBU 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.*

Recommendations 8 and 9 deal with the same point. In 2020 the Home Office commissioned a piece of work on The Cost of Fire to the economy of the nation. The issue they found is that it is incredibly difficult to garner meaningful data on the impact the fire service has, and this also applies to Road Traffic Collisions (RTCs) and other rescues. For example, page 9 of the FBU response refers to the platinum 10 minutes and the 'golden hour' and provides data which HWFRS provide to the FRA on a quarterly basis of injuries and fatalities. Whilst the theory of the 'speed and weight of attack' has some established credibility, it is difficult to evidence to what extent the FRSs intervention in this regard have an impact. There are simply too many variables from the nature and mechanism of injury to the medical interventions taken by paramedics and the speed and method of transportation to definitive care. However, if the FBU is privy to any other data sets or work in this area, the FRA would be open to exploring how best to analyse and use any such data.

**FBU 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.*

The Service has (in 2024) heavily invested in the Day Crewing model at Malvern, Evesham and Droitwich, and has increased the establishment on each Watch to 6, meaning there are now six extra full time staff across these three locations and new duty system successfully implemented.

**FBU Recommendation 11:** *All fire engines must be crewed with five Firefighters.* This references the Resource Review and has been addressed separately.

**FBU 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.*

Any solution to this recommendation requires increased funding and has been addressed in detail in the Resource Review and therefore is not relevant to the CRMP consultation. However the FBU should note, that any staffing reductions are usually aligned to limited resources and are not routinely made as a choice.

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

This recommendation is not relevant to the CRMP consultation and should be addressed in another arena.

**FBU 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 has invested heavily in On-Call recruitment and retention and now have an established and dedicated On-Call recruitment team, which also explore and implement ways of retaining existing staff.

HWFRS actively participates in the NFCC On-Call Strategic Group and the NFCC On-Call Practitioners Forum. Members of our On-Call recruitment team have contributed to the task and finish group responsible for designing and developing the NFCC On-Call Recruitment website.

HWFRS have recently received an award from the Chamber of Commerce for their On-Call work. The On-Call recruitment team regularly attend Chamber of Commerce events, working hard to promote the benefits to businesses who are supportive of employees becoming On-Call Firefighters whilst strengthening HWFRS's ongoing efforts to recruit On-Call Firefighters.

**FBU 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.*

The FRA refutes the suggestion that its Fire Control operatives are treated any differently than the rest of its staff, particularly in reference to the '*dichotomy to the Service's culture statement*'. Control staff have the same access to support mechanisms, occupational health

and counselling and to the debrief and other feedback systems which can be completed during work time. The FBU refer to a Critical Illness Stress Debrief which the FRA assumes is CIST. It should be pointed out, that the FRA provides the option to attend these sessions out of hours and offer staff payment for doing so. As previously stated, the FRA are committed to supporting all members of staff's physical or mental wellbeing at work or at home, including members of Fire Control.

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

As the FBU states on page 13 of their response, the new Command and Control system has been procured and due for implementation in 2026, which will resolve this issue.

**FBU 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.*

This references the Resource Review and is dealt with separately.

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

The Joint Consultative Committee (JCC) Agenda has a standing item titled "His Majesty's Inspectorate of Constabularies and Fire and Rescue Services (HMICFRS) Inspection Update" which the Assistant Chief Fire Officer (ACFO) chairs. The FRA hopes the FBU agrees this demonstrates the transparency and the two-way communication channels which exist between HWFRS and all Representative bodies, including the FBU.

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

It is assumed this refers to the State of Fire Report 2021 and consequently, the FRA would require more detail from the FBU on which areas they believe do not correspond to the experience of HWFRS. Again, this does not reference the CRMP consultation.

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

This recommendation is not for the CRMP to address.

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

This recommendation is not for the CRMP to address.

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

On this topic, the FRA would like to provide the FBU with assurance that this refers to departmental work within the Prevention department. As such, there are no expectations for FBU members to contribute towards this initiative although the JCC (see above) is a platform for such discussions.

**FBU Recommendation 23:** *Provide further clarity consistent with Firefighter role-maps 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”.*

As stated in the Road Safety section of the CRMP 2025-30, HWFRS have launched a new road safety scheme called Your Impact. Your Impact is a free, multi-agency road safety scheme aimed at reducing death and serious injury among young road users in our communities. It is run solely by the Prevention department in collaboration with partners and has no bearing on the Firefighter role map. HWFRS have also identified the over 65 age range as a target group which is why the public consultation asks if we should expand this initiative to other target groups.

**FBU 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.*

Whilst this, again, would require additional funding it cannot be resolved via the CRMP and the FBU will be aware of the scarcity of qualified Fire Safety Inspectors nationally.

The FBU will also be aware that the government made available a Protection Grant Fund which has been used to upskill not only the Protection department, but also operational staff. In total £850,000 of grant funding has been invested in the Protection Department.

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

This recommendation heavily references the Resource Review and therefore will not be addressed directly in the response. However, the FRA finds this recommendation confusing, particularly as the Authority has now transitioned from the Attendance Standard to the much wider reaching and comprehensive Attendance Performance Measure (APM).

**FBU Recommendation 26:** *Repeal the graded response policy.*

The Graded Response Policy is an evidenced based document written with not only Firefighters', but also with our community's safety in mind. The FBU will be acutely aware of tragedies that have been witnessed nationally involving fire appliances and other emergency services travelling to lower risk or non-emergency operational incidents at speed that may not justify that the level of road risk being undertaken. This policy seeks to safeguard against similar incidents occurring within our communities and, as such, the Policy will not be repealed.

**FBU 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 matter is subject to policy, which we may consult on, and is not a matter for negotiation as is clearly defined in our trade union policies. The FBU will be aware that the Civil Contingencies Act 2004 (CCA) mandates collaboration among various emergency response organisations in the UK. As discussed previously within this response, the JCC is a platform for where constructive consultation and discussion takes place with all representative bodies.

### **3. Hereford & Worcester Fire Authority's Formal Response to the FBU's Recommendations (A – W) to HWFRS's Draft CRMP 2025-30**

**FBU 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.*

The FRA would like to provide assurance that any material changes in policies and procedures will go through the standard consultation process. It is disappointing, however, that the recommendation then slips back into the issues around funding which, as previously stated, will not be addressed in this response.

When referencing the flooding figures, it is slightly confusing to the reader how the FBU can claim *'that these figures are misleading'* when the FRA clearly provides its own caveat that *'the actual number of properties is likely to have been considerably greater as several properties would have been attended in succession but recorded under a single incident number'*. We are, therefore, not in agreement.

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

Pages 20-24 of the FBU response provides a detailed account of the Grenfell tragedy and the subsequent recommendations from the Grenfell Tower Inquires (GTI).

The FRA would like to provide assurance to the FBU that all recommendations from GTI 1 have now been discharged. Work is also well underway, evidenced via a gap analysis, to discharging the recommendations from GTI 2.

Whilst Herefordshire and Worcestershire have only a small amount of high-rise buildings, the FRA has been committed to addressing the recommendations made in the subsequent inquiries.

However on this subject, the FRA has listened closely to the FBU and will amend the CRMP 2025-2030 to provide an enhanced section on Grenfell Tower outcomes.

**FBU 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.*

As stated earlier in this document, matters concerning the Resource Review will not be addressed in this report. However, the FRA reassure the FBU to note that a working group which includes FBU members has been established to monitor and review the use of Crew Carriers. As previously stated, the JCC provides a platform for discussion and consultation.

**FBU 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.*

Again, this matter is part of the Resource Review and not this CRMP.

This section in the FBU response also questions HWFRS' resilience in regard to Urban Search and Rescue (USAR) deployments. The FRA would like to provide assurance to the

FBU that HWFRS avoid taking Firefighters off fire engines for USAR deployments wherever possible. If it was essential to do so, the standard cover procedures would be employed. However, the FRA would like to provide further assurance to the FBU that there have been no 'longer-duration' deployments in the life cycle of the current CRMP and HWFRS have never needed to deploy a USAR team for anywhere near the quoted 30 days.

As with so many of the FBU's recommendations, the value for money to the public must be at the forefront of our resourcing and the prevailing infrequency of USAR deployments cannot be cited as a reason to increase our establishment unnecessarily.

**FBU 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.*

The Community Risk Register and our role in the Local Resilience Forum are both referenced in the Service Collaboration Document and in the supporting research documents. However, the FRA accepts this should be brought to the attention of our communities and, as such, additional references have been made throughout the final version of the CRMP.

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

This recommendation directly references the Resource Review and has been addressed previously.

**FBU 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.*

The FBU appear to be questioning the FRA's transparency around its presentation of incident data. The FRA would like to provide the FBU with assurance that it is well versed in gathering, analysing and presenting data in line with the government's methodologies.

**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.*

This recommendation refers to government funding and will not be addressed in this consultation document.

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

The FRA are aware of the wording in the National Framework referring to all foreseeable fire and rescue related risk and, as such, have gone to extensive measures to identify and address risk across our two counties and consulted on this. The FRA would like to provide just one example of the methodologies used below:

On page 46, the FBU cites Levels of Unemployment, Benefit Claims and Foodbank Usage as markers for foreseeable risk. The FRA would like to provide assurance that as part of the NFCC Risk Methodologies, the Indices of Deprivation and Lower Layer Super Output Area (LSOA) criteria are used to help define risk. These provide an incredibly textured understanding of the area's most at risk and include the following criteria:

- Income Deprivation: Measures the proportion of the population experiencing deprivation related to low income.
- Employment Deprivation: Assesses the proportion of working-age people involuntarily excluded from the labour market.
- Education, Skills, and Training Deprivation: Evaluates the lack of educational attainment and skills in the local population.
- Health Deprivation and Disability: Considers the risk of premature death and the impairment of quality of life through poor physical or mental health.
- Crime: Measures the risk of personal and material victimisation at local levels.
- Barriers to Housing and Services: Assesses the physical and financial accessibility of housing and key local services.
- Living Environment Deprivation: Evaluates the quality of the local environment, including housing quality, air quality, and road traffic accidents.

These domains are combined to produce an overall deprivation score for each LSOA, which helps in identifying and addressing areas most in need of support.

Regarding any recommendations on the identification, definition and assessment of risk, the FRA would encourage the FBU to read and fully understand the methodologies used in compiling this draft CRMP to avoid misunderstanding.

**FBU 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 draft CRMP 2025-30 has been written against the backdrop of the current response model and through extensive risk methodology and assessment, found HWFRS to be very well placed to mitigate the identified risks with the resources available. Not only the number of staff but the locations of our stations in relation to our station risk profiles provide the most effective and efficient response model for the risks identified across our communities.

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

Resourcing continually for multiple large-scale incidents simply is not supported by the data and would be an indefensible use of public money. In the rare occasions where HWFRS resources become depleted, the FBU will be aware of the Sections 13 and 16 of the Fire and Rescue Services Act 2004 which outline important collaborative and contractual arrangements for UK fire services, alongside other mechanisms for national support if needed.

On page 47 of the FBU response, it states *‘the increased numbers of people living in the two counties, will ... increase the income for the Service through council tax and business rates’*. It is assumed that the FBU understand that the funding and budget allocation for an FRS is not as binary as this. However, the FBU can be assured that the FRA scrutinises closely how taxpayers’ money is used by HWFRS.

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

The FRA thanks the FBU for highlighting the all too evident threat and potential impacts of cyber-attacks in the present climate and assures the FBU that the Services ICT Department are well versed in the measures needed to protect our IT infrastructure. The FRA would signpost the Service's Digital and Data strategy and the Cyber Security Posture and Digital Landscape section of the CRMP. The ICT department are continually assessing and reviewing the impact of cyber-attacks and are extremely well placed to deal with any threats, adopting learning from the WannaCry attack and several other security breaches.

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

By analysing the past five years of incident data and cross referencing the impact on fire cover, the FRA are pleased to reassure the FBU that it is more than able to respond to and adequately resource large scale incidents.

During the past five years (1 April 2020 to 31 March 2025), the Service attended 185 incidents requiring five or more fire engines, and out of these there were only three occasions where the Service managed two large incidents simultaneously.

Furthermore, during the same period, the Service attended only 46 incidents requiring eight or more fire engines, less than ten per year.

**FBU 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.*

The FBU recognises that the Political, Economic, Social, Technology, Environment and Legal (PESTEL) analysis identifies the potential for pandemic and emerging infectious diseases including avian influenza. However, the FRA agrees that this would benefit from more detail in the main CRMP and, as such, the FRA has undertaken to include a section on pandemic preparedness.

HWFRS is already an active member of the West Mercia LRF (WMLRF) alongside the Environment Agency and the UK Health Security Agency. All members collaborate via Resilience Direct and at Tactical Coordination Groups during times of emergency or major incidents. The group also collaborates with DEFRA and other agencies to ensure that the WMLRF can effectively coordinate responses to environmental incidents and leverage DEFRA's expertise and resources.

**FBU 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.*

In the unfortunate instances where a life is lost at an incident involving fire, HWFRS deploy two specialist Fire Investigation (FI) officers. FI's are highly trained in reading and interpreting fire behaviour and post fire indicators and make extensive notes to produce expert witness statements for appearance in either the Crown Court or the Coroners Court. Part of this notetaking involves the detailed assessment of the building construction, materials used and whether they contributed to the fire development and spread. Should it

be found that the building did not behave as expected, this is reviewed both at the Prevention Department led Fire Deaths and Serious Injuries Group and during fire investigation Continuing Personal Development (CPD) sessions.

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

As with all collaborative arrangements, the decision to previously align HWFRA's CRMP with Shropshire's was with the intention of mutual benefit. During the life cycle of the current CRMP, the risks and benefits have been continually reviewed, and the decision was made by the FRA for the Alliance to evolve and focus our collaborative efforts on the Command and Control procurement project. This project is still underway and is taking a considerable amount of time and resources, therefore it was not deemed efficient or necessary to combine this CRMP with Shropshire FRS.

**FBU Recommendations Q, R & S** do not appear to be evidenced with any supporting text, so it is difficult to determine the context in which they were meant.

**FBU 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.*

The FRA thanks the FBU for drawing to its attention the handful of typing errors and discrepancies in figures. These will be addressed and, where appropriate, amended in the final version.

Given the title of this section, however, it seems appropriate to provide some feedback to the FBU on their use of data and methods of presentation to avoid any misinterpretation in future responses.

An inconsistent approach appears to have been taken by the FBU in the creation of charts, with variations across several variables which includes discrepancies in the timeframes of the data presented and discussed throughout the document, for example:

- Figure 2.1 – Primary Fire Casualties: Covers nearly four full financial years (April 2021 to December 2024).
- Figure 3 – Number of Firefighters: Spans from 2010 to 2024, but with an 11-year gap between 2010 and 2021. It is inappropriate to conduct trend analysis in this case, as data for 11 out of 15 years is missing. For Fire Control, it would also be more suitable to report Full-Time Equivalent (FTE) figures, as several Firefighters provide only a few hours of cover each month which may not have been the case in 2010.
- Figure 4 – Firefighter Pay vs Inflation: Presents a continuous 15-year dataset.
- Figure 5 – On-Call Availability: Reverts to the same period as Figure 2.1.
- Figure 7 – Attendance Standard: Covers only two financial years (April 2021 to March 2023).
- Figure 9 – Attendance Standard: Covers less than two financial years (April 2023 to December 2024).

While it is understandable that not all datasets may have been available for the same time periods, they should have been thoroughly reviewed, and a consistent timeframe adopted to ensure comparability and alignment with the points being raised.

The same principle applies to the presentation of data, e.g.,

- Figure 8 – Response Times, the y-axis ranges from 46.0% to 62.0%, which is a commonly criticised technique used to exaggerate minor changes.

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

The FBU have used figures from the Quarterly Performance Reports which are scrutinised by both SLB and the FRA, so they will be aware of the reasons for absence that make up part of the data. These figures are discussed and the underlying reasons analysed in several ways including by the Strategic Leadership Board, H&S Committee and through the HR Department with our Occupational Health providers. The welfare and support available for staff has been covered earlier in this document and the FRA remains resolute in supporting the mental wellbeing of its employees. It is more difficult, however, to safeguard against cold and flu-like symptoms which was the number one reason for sickness in the latest Quarterly Report.

It is interesting to note that the FBU have used only the three years post COVID-19 to demonstrate the absences due to mental health. It should be noted that mental health or stress can relate to perceived work-related factors, but is more predominantly often due to personal factors. The FBU is aware that anxiety, stress and depression have risen in society, exponentially since 2020 and is directly linked to the impacts of COVID-19. This is a national, cross-sector challenge.

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

The FRA through the Service has put in place measures to address these concerns, and is aware of the cancer monitoring study for Firefighters, led by the FBU and the University of Central Lancashire (UCLan) and awaits the findings with interest, alongside the work undertaken by NFCC. The FBU may agree, it is far too early in the inception of the study to draw any meaningful conclusions and, subsequently put in place mitigating measures, such as monitoring for cancers, however staff do undergo three yearly medicals with highly qualified doctors. The FRA remains resolute in supporting the health and wellbeing of all members of staff.

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

It is unfortunate that the FBU feels the FRA have failed to negotiate over the duration of the current CRMP, and would dispute this assertion.

The FRA is aware of its legal requirements to consult representative bodies.

HWFRS is committed to maintaining open lines of communication and good relations with all trade unions and will continue to consult and negotiate with them wherever necessary and appropriate.

