



Chief Fire Officer/Chief Executive M Yates QFSM MA MCGI DMS MIFireE
 Hereford & Worcester Fire and Rescue Service Headquarters
 2 Kings Court Charles Hastings Way Worcester WR5 1JR
 Tel 0845 12 24454 Fax 01905 357 466 Web www.hwfire.org.uk

11th February 2014

Private & Confidential

Telephone: 01905 368248

Mr Steve Gould
 FBU Secretary
 Hereford & Worcester Fire and Rescue Service
 Evesham Fire Station
 Merstow Green
 Evesham
 Worcs WR11 4BD

Dear Steve

Consultation on the Draft Community Risk Management Plan 2014-2020

I advised in my letter of 10th January 2014 that we would provide you with further comments on the main points raised in your consultation submission. Using your report as a template, we have addressed the points raised in order and referenced the appropriate sections of your report. Where any points were raised on more than one occasion, we have made a cross-reference in this response.

For ease of reading in the following sections, we have highlighted the main points in your submission in blue, while our responses are in black. We have summarised as far as possible.

1.0	Introduction – main points	HWFRS response
1.1	Strong concern that continuing funding reductions are reaching “dangerously low” levels, such that the level of fire and emergency cover is “not safe for the community or staff.”	Funding is set by central government. The Service has made, and will continue to make, representations to Ministers.
1.2	Suggestion that the Fire Authority and Service will try to say that services “will be more efficient and effective following the CRMP.”	We have never pretended that the need for changes in fire cover is anything other than finance driven and have not stated that the Service will be more efficient.
1.3	Concern about setting own rather than national attendance standards, and that if the current standards cannot be met, they will be “changed in order for the Service to meet its set criteria.”	There are no nationally set attendance standards.
1.4	Strong concern about the use of two different time periods (10 years for CRMP	10 years’ data has been used to show long term trends. 5 years’ data has been used to





	and 5 years for fire cover review), and a view that this “gives a false reading as to how many incidents are attended by stations,” and that “data needs to be compared like-for-like otherwise it creates spurious results. This could lead the reader to question the validity and reliability of the results...”	help identify current call levels. This is entirely appropriate and statistically robust. These two sets of data are not compared and therefore there is no confusion.
1.5	Concern that with insufficient data being presented, the reader will not have “all the facts” to enable them to provide robust response to the consultation questions.	There has been no attempt to conceal data. We have shared all the data with the FBU from the earliest stages of the review work in May 2013.
1.6	Suggestion that the CRMP “is solely about balancing a budget deficit” but is being “dressed up as efficiencies.”	We have never and nor does the CRMP pretended that the need for changes in fire cover is anything other than finance driven. The CRMP aims to ensure that part of the required savings are achieved in the manner which has the least detrimental impact on the service to the public.
1.7	Suggestion that the consultation process is not open and transparent, and is therefore “flawed.”	Disagree. In what ways could it have been more open and transparent? All data and evidence is readily available and any other information asked for has been supplied. All responses have been placed on line and full detailed report prepared for the FRA. The FBU were engaged before any other organisation and all raw data supplied.

2.0	Executive Summary – main points	HWFRS response
2.1	Concern that HWFRS service delivery is “already below what it ought to be,” and that by the end of the CRMP process, it will be “at its skeletal thinnest with vastly reduced resilience affecting operational performance in our communities.”	A very subjective un-evidenced statement and we disagree. Quarterly performance monitoring by SMB and Authority Members shows that the standard of service delivery is already high and continues to improve. The level of fire cover proposed in the CRMP is consistent with the risk across the two counties.
2.2	Concern that many of the identified cuts “cannot be viewed in isolation”, and that consideration should be given to assessing	This has already been taken into account when formulating the CRMP proposals.



	"how each cut impacts on the entire service."	
2.3	Concern that while "recent and continuing investment into stations equipment is to be applauded" there is also a need for "continued investment in personnel numbers."	Staffing levels will reflect the needs of the Service.
2.4	View that "it is imperative ... to secure additional funding to prevent further erosion of the service."	We continue to lobby Government for better funding

3.0	Effect of Emergencies on Society – main points	HWFRS response
3.1	Concern that the concentration on "life risk" in the CRMP misses the "far wider reaching implications on the broader society, when a fire or other emergency occurs" and that unless every aspect of risk is considered, "the whole process will be flawed."	The CRMP takes account of these broader risks and the process is very robust and not flawed.
3.2	Suggestion that the CRMP should be put together following the steps set out in the FBU document "The Framework Document: How to Construct an IRMP."	Disagree.
3.3	View that the consultation stage of the CRMP process should highlight the difference between "true efficiency savings" and "cuts in service that are forced on the FRS, as a result of budgetary constraints," that is: "if providing value for money means providing a lower level of service because fewer finances are available, the IRMP consultation has to say so."	Disagree. See answer to 1.6 (above)

4.0	Emergency Cover "Intervention" – main points	HWFRS response
4.1	Concern that in terms of emergency cover the CRMP should take account of the Civil Contingencies Act 2004 Risk Register as a Category 1 responder, and also "plan and provide for conceivable emergencies,	The Service will continue to meet its duties within the Civil Contingencies Act and is fully aware of all statutory responsibilities.



	across the whole range of possibilities.” Otherwise, the CRMP will not be comprehensive.	
4.2	Suggestion that planning for emergency cover provision should follow the Critical Attendance Standards (CAST) scenario planning tool as set out in the FBU’s document “It’s About Time.”	Disagree. We have used the Phoenix modelling software which is a recognised and proven approach across the fire services industry

5.0	Q1 – Issues facing our two communities – main points	HWFRS response
5.1	Contention that “the economic situation is the main reason for the content of this CRMP, this is what makes it a purely budget cutting exercise rather than a true CRMP which matches resources to risk.”	See answer to 1.6 (above)
5.2	Strong concern that the level of funding per head for HWFRS is “well below average” and “coupled with the massive budget cut will make this Service less effective and will leave the public and its staff less safe in emergency situations.” The question is asked: “why is a hard working, efficient and forward-thinking Service such as ours punished in this way?”	See answer to 2.4 (above)
5.3	View that the FRA “need to lobby government to get these devastating cuts reversed and the budget issue in Hereford and Worcester needs to be addressed.”	See answer to 2.4 (above)
5.4	View that “the (massive) growth in population will certainly cause an increase in incidents just at the time when this Service is slashing fire cover” and that this will “place a huge strain on an already lean Fire Service...”	Projected population growth has been taken into consideration including growth in Council tax base.
5.5	View that a growing population will also “yield an ever growing council tax pot which will increase Fire Service funding from local councils.”	Projected increases in the Council tax base are already factored in to the required budget reductions.
5.6	View that the changing environment is very challenging, with “yearly flooding of ever increasing severity,” and a view that the 2007 floods stretched the Service “to	Disagree. The Service is better equipped to deal with flooding incidents than it was in 2007. This will not change as a result of the CRMP.



	its absolute limit; this Service will not cope with floods of that magnitude if these cuts are forced through."	
5.7	Concern that the FRS is not funded for water rescue/flooding incidents, and that funding for this will have to come from "their ever dwindling pot of finances."	There is a clear expectation that the fire service will respond to these types of incidents
5.8	View that HWFRS needs to lobby ministers to make water rescues "one of our primary functions and responsibilities in order to gain funding for these activities..."	This is an on-going national debate which HWFRS is engaged in through CFOA.

6.0	Q2 – Financial issues facing the Fire and Rescue Authority – main points	HWFRS response
6.1	Strong concern that while the CRMP says that cuts "will be done in a way that has least impact on the Service and the community" the cuts "will not be minimal" and will "have a devastating effect on the Service and the community."	Disagree. The level of fire cover proposed in the CRMP is consistent with the risk across the two counties and the overall impact is low when considering the total number of incidents attended.
6.2	Concern that following the cuts Herefordshire will be left with only one full-time fire engine, and that "it is a vast area to be covered by just one full-time fire engine" leaving the people of Herefordshire "waiting for the next full-time fire engine to come from Malvern..."	Ignoring the available response from retained stations is insulting to colleagues at those stations and misleading to the public. Malvern station provides primary cover to a small proportion of Herefordshire along the county border with the vast majority of Herefordshire's cover coming from on call stations.
6.3	Concern that taking away a wholetime fire engine from Worcester the busiest fire station "will have a massive impact on the people of Worcester with the next full-time fire engine coming from Droitwich or Malvern."	See answer to 6.1 (above)
6.4	View that "any serious house fire needs two fire appliances immediately to deal with such a fire" but concern that HWFRS has not carried out "its own task analysis for incidents such as this" and that "this work must be carried out before contemplating the removal of fire engines from the front line."	Disagree. The proposed reductions from 3 to 2 fire engines and from 2 to 1 fire engines do not create a provision or system that is not already in place elsewhere in the Service area. All property fires will continue to receive an attendance from two fire engines.
6.5	View that "the CRMP has gone for an easy	See answers to 1.6 and 6.1 (above)



	option – removing both Hereford and Worcester 2 nd full-time fire engine” and that “the savings equate to approximately £1.5m, meaning this option is purely a financial consideration and nothing to do with safety and impact on our communities.”	
6.6	View that “relying on Retained (on-call) fire appliances carries a degree of risk as these fire engines are rarely crewed all of the time, in comparison to their wholetime counterparts.”	The crewing patterns at each station are consistent with the fire and emergency risk in that area. It is accepted that on call fire engines are sometimes unavailable and this is monitored closely.
6.7	View that wholetime members of staff at Hereford and Worcester fire stations “are increasingly being used to bolster cover at Retained fire stations struggling to provide cover of their own,” and that “stripping wholetime staff will mean there will be no one to assist these rural stations when they are short of staff, resulting in a damaging loss of fire cover.”	Disagree. Overall resilience has been taken into consideration.
6.8	View that [removing on-call firefighter posts] will “place a huge amount of stress on the RDS firefighter’s primary employers, who face their staff being away from their primary workplace for ever increasing periods.”	We are conscious of this and will monitor the situation but do not believe the changes will have a significant impact at this time. Some changes to mobilising will take place to address this issue with more use being made of wholetime staff crewed appliances.
6.9	Concern that employers may give their RDS employees “an ultimatum of their primary employment or the Fire Service” and that “it is highly unlikely that the RDS staff will choose the Fire Service...”	See above.
6.10	Concern that while senior managers often say that “we have the right amount of fire engines in the right place,” so “how can the CRMP justify removing these fire engines and fire stations?”	The CRMP reflects future resources and addresses how best to utilise these to meet the future fire and emergency risk across the two counties.
6.11	Concern that the use of Land Rover Freelander and Discovery vehicles for responding officers and senior members of staff is “an extremely costly and unnecessary expense at this time of austerity” and that there are “cheaper alternatives” that “this Service should be	Full details of the rationale for purchasing Land Rovers have been published and has demonstrated how these vehicles are cost effective, provide value for money and are the best and safest manner to provide the capability needed.



	duty bound to explore.”	
6.12	View that while the Service has made “cuts in civilian staff, senior staff and operational crews on fire stations,” there have been “very little cuts to the middle management ” and that with fewer firefighters “you need less managers to manage them.” Suggestion that the Service compares its middle management structure with that of similar FRs and identifies best practice to make savings.	Disagree. Many middle managers posts have already been cut from HQ and the officer core. We already have plans to review the number of uniformed officers again which it is anticipated will reduce middle managers further.
6.13	View that the “excellent piece of work” carried out into achieving management savings should have been included “within the remit of the CRMP and should not have been left to employees to identify such substantial savings.”	This piece of work carried out by a watch is very much valued and representatives from that watch were invited to present their findings to the Senior Management Board. However, this work appeared to mirror the work already on-going in the Service and didn’t provide additional savings over and above those already identified.
6.14	View that restructuring management within the Service would achieve the ‘minimum impact on the communities we serve’ as stated in the CRMP.	73% of the budget reductions made during 2010-2017 will have come from areas away from front line service delivery. These are in addition to, not instead of, changes proposed in the CRMP. Management is continually restructured and many posts have been removed.

7.0	Q3 – Understanding Risk – main points	HWFRS response
7.1	FBU “extremely concerned over the figures used to produce the review, “ and has raised a “formal complaint” into how data has been presented in the CRMP. View that the use of two different time periods “gives a false understanding as to how many incidents are attended by stations” and may “create spurious results” that question the “validity and reliability of the results.”	See answer to 1.4 (above) Response given to complaint which couldn’t be upheld.
7.2	Strong concern that cuts to front line service cannot be justified when there has been an increase in both fires and road traffic collisions in recent years.	The long term data, both local and national, indicates otherwise



7.3	Concern that the CRMP does not take into account the use of call-challenging for Automatic Fire Alarms, which has reduced our attendance “drastically.” View that to be open and transparent the CRMP should have made “all information in regard to operational activity” available, so that “all stakeholders have the opportunity to make an informed decision on these proposed cuts to the front line.”	More effective deployment of resources through effective call challenging is not a reduction in front line service. Our false alarm call levels have reduced moderately in comparison to other services but more can be done in this area.
7.4	View that the recent rise in fires and road traffic collisions “shows that the public are at greater risk than in previous years” and concern that adding in the “rise in flooding and water-based incidents” at the same time as “these devastating cuts” “will make our communities a much less safe place to live.”	Disagree. See answer to 6.1 (above)

8.0	Q4 – Tacking Risk – main points	HWFRS response
8.1	<u>Prevention</u> : concern that the CRMP “says nothing about the impact the loss of firefighter posts will have on the effectiveness of its stated aims.” View that the majority of HFSCs are carried out by operational crews, and the loss of firefighters to carry out such checks “will inhibit the Service’s ability to carry out effective fire safety campaigns.”	The reduction in resources will be recognised by a more targeted approach to community safety work.
8.2	<u>Prevention</u> : concern that the use of software and good practice “are no good without the trained personnel to continue the good work we have been doing in this field ...”	See above
8.3	<u>Protection</u> : concern that the recent re-introduction of fire safety inspections of business properties “will also be severely hampered by a lack of personnel to carry them out.”	Remaining crews will have adequate capacity to carry out this work
8.4	<u>Protection</u> : concern that while training will be extended to more officers “if there are less officers to train then that can only increase the burden on those that are left”	See answer to 8.1 (above)



	in addition to undertaking their normal duties ..."	
8.5	<u>Response</u> : concern that the CRMP states that while there is an increased pressure on finances the Service can 'reduce the number of fire engines and firefighters we need, and still maintain an effective response service' but FBU considers that the removal of "10 fire engines from a force of 43 can only have a hugely detrimental effect on the service given to the public."	See answer to 6.1 (above)
8.6	<u>Response</u> : view that the CRMP should balance risk in the community to the resources required "not just those we can afford."	The Service has to work within the funding available. Also, see answer to 6.1 (above)
8.7	<u>Response</u> : strong concern that the CRMP states that there has been a fall in the number of incidents we need to attend, but the FBU dispute this "in the strongest terms."	The data is irrefutable.
8.8	<u>Resilience</u> : view that the reduction of "around a quarter of the resources currently available" will have "a devastating affect on our ability to cope with any significant incident or natural disaster and still allow the service to function effectively during them."	See answers to 6.1 and 6.7 (above)
8.9	<u>Resilience</u> : view that while "we may 'cope' on a day-to-day basis" the incident at Smethwick "showed that paring fire services to the bare minimum is a dangerous gamble." View that relying on assistance from neighbouring FRS will not be possible as they are also "subject to the same arbitrary 'austerity measures,' stripping fire cover and making communities less safe than they have ever been since the formation of the modern fire service."	See answers to 6.1 and 6.7 (above) There will always be some incidents that require assistance to/from neighbouring services but the fire cover model proposed does not rely on neighbouring
9.0	Q5 – Delivering Our Service – main points	HWFRS response
9.1	FBU reiterates the point about the validity	See previous answers to 1.4 and 7.2 (above)



	of the data used and is concerned by the recent increase in fires and road traffic collisions, and in terms of the increase in fire this should be regarded as “a significant increase in fires not a slight one.”	
9.2	FBU makes the point again that the call challenging policy in regard to Automatic Fire Alarms and other incidents (see point 7.3 above) and that now a single officer may be sent to assess the incident instead of a fire engine.	Call challenging has been successful in reducing unnecessary mobilisations
9.3	Strong concern that “despite requests” the Service has refused to use a 10 year period to measure mobilisation data instead of 5 years, again calling into question “the validity of the CRMP – we do not believe the claim that this is an open and transparent document.”	See answer to 1.4 (above). Advice from the independent expert is that 5 years’ data is optimum for assessing future call levels.
9.4	View that the removal of a wholetime fire engine from both Hereford and Worcester fire stations will not “minimise the impact to the public as suggested in Proposal 1.”	See answer to 6.1 (above)
9.5	Repeated concern that Herefordshire will only have one wholetime fire engine in “a large, mainly rural county with a very limited road network.”(see point 6.2 above)	See answer to 6.1 (above)
9.6	Concern that removing the second fire engine at Hereford fire station will leave the city “devoid of fire cover” and are “removing a key factor in enabling resilience for fire cover across Herefordshire.” This is seen as both unacceptable to the county’s council tax payers and “potentially dangerous to the community.” (see also point 6.2 above)	See answers to 6.1 and 6.7 (above)
9.7	Concern that removing the second fire engine at Worcester fire station will be “removing a fire engine that attends 490 incidents per year” questioning “how is this minimal impact to the people of yet another Cathedral City ...?” and repeats a view that “such a resource cannot be removed with minimal impact.”	The current retained appliance will fill the existing second fire engines position and the calls, dependant on location, will be answered by either this appliance or one of the others that surround the Worcester city area (Droitwich, Pershore, Upton, Malvern), all of which are unaffected by this CRMP.



9.8	Repeated concern about the expectation on Retained firefighters “to fill the void left by the removal of full-time posts” and the impact on themselves, their home lives and their employers. (see points 6.8 and 6.9 above)	See answer to 6.8 (above)
9.9	Concern that retained firefighters “could end up attending the 490 incidents ... the second fire engine at Worcester attends” and that “it is simply not feasible to have a Retained fire engine that is that busy.”	See answer to 9.7 above
9.10	Repeated strong concern that the people and businesses of the two counties should understand that the CRMP “is about balancing the Service’s financial books and not about providing the right level of fire cover.” (see points 1.6 and 5.1 above)	It is about doing both

10.0	Q6 – Emergency Cover Proposals – main points	HWFRS response
10.1	Repeated concern that the Service has continued to state over the last ten years that it has the right number of fire engines in the right place (see point 6.10 above), and asks “what has changed in that time?” except house-building and population numbers are increasing, again arguing that “these cuts will not be minimal but have a devastating affect on the Service and the community.”	See answer to 6.10 (above)
10.2	Concern that the cuts to fire engines and firefighters “will be hugely detrimental to the Service’s ability to respond to anything but day-to-day minor incidents.” (see points 8.5 and 8.9 above)	Disagree. See answers to 6.1 and 6.7 (above)
10.3	Repeated concern that the Service will not have the resilience to deal with a number of incidents at the same time, such as “a period of unfavourable/inclement weather or a period of illness/sickness affecting a large number of staff.” (see point 8.9 above)	Disagree. See answers to 5.6, 6.1 and 6.7 (above)
10.4	Concern that the proposals “strips on-call	See answer to 6.1 above





	fire engines from rural areas, inevitably leading to greater response times, seconds and minutes that may mean the difference between life and death for those trapped in fire, car accidents and floods.”	
10.5	Repeated concern about the removal of Worcester’s second fire engine leaving “part-time firefighters to deal with the inevitable strain on their time and primary jobs.” (see points 6.8 and 6.9 above)	Disagree. See answers to 9.7 and 9.8 (above)
10.6	Strong concern that following the implementation of the proposals “people needing the help of the Service will have to wait longer and get less firefighters arriving to help” and that “this is an unacceptable position.”	Some fire engines may take slightly longer to attend a small number of incidents in some areas, however the number of firefighters requested and delivered to the incident will remain unchanged.
10.7	Repeated strong concern that “this review of fire cover is based on the financial situation faced by the Service rather than a true reflection of the assessment of the risks to the residents of the two counties and to the firefighters who have to deal with those risks.” (see points 1.6, 5.1 and 9.10 above)	It is based on both.

11.0	Q7 – What will we see by 2020 – main points	HWFRS response
11.1	Concern that the growth in house-building and consequent increase in council-tax revenue has not been taken into account in the CRMP (see point 5.5 above)	Yes it has – see answer to 5.5 above.
11.2	View that the three key principles of firefighter safety, community safety and quality services “cannot be achieved with the cut in the Fire and Rescue budget on which this CRMP is based.”	Disagree.
11.3	Repeated strong concern that fewer firefighters, fire engines and fire stations “cannot do anything other than put the public and firefighters at greater risk of death and injury from emergency incidents if these devastating cuts are forced through.” (see in particular points 1.1, 6.1,	Disagree. Whilst we would prefer not to make cuts to front line services, the level of fire cover proposed in the CRMP is consistent with the risk across the two counties



11.4	8.5, 10.1 and 10.6 above) Repeated concern that “the Service will be reduced to a bare minimum” with “no resilience” to respond to such as major flooding events or long, hot summers. (see points 8.8, 8.9 and 10.3 above)	Disagree. See answers to 5.6, 6.1 and 6.7 (above)
-------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------

12.0	Conclusion – main points	HWFRS response
12.1	Repeated strong concern that the CRMP is “a review not of the risks faced by our counties, but of what we can afford with the monies we are allocated.” (see points 1.6, 5.1, 9.10 and 10.7 above)	See 11.3 above
12.2	Repeated strong concern that “these proposals mean ... an increase in the threat to lives.” (see in particular points 1.1, 6.1, 8.5, 10.1, 10.6 and 11.3 above)	See previous responses.
12.3	Repeated view that the Service continues to be underfunded, welcoming the counties’ MPs recent intervention in lobbying for the rise in grant. (see points 5.2 and 5.3 above)	Agreed. See 1.1 above.
12.4	Strong view that FRA should “look at the back-room staff, 174 members of staff are employed by the Service who do not ride fire engines.”	The Service has already made significant reductions in ‘back room’ staff and further reductions are planned. However, without those support staff there would not be the equipment and systems that keep firefighters safe nor the fire engines for them to ride on.
12.5	View that “a fair grant coupled with changes to the way the service is managed can mean that we can afford to keep fire cover at its present level, save our fire engines and keep firefighters in their communities.” (see points 6.12, 6.13 and 6.14)	As to grant funding – see 1.1, 2.4 and 8.6 above. As to management structure – see 6.12 and 6.14 above
12.6	Repeated view that “proper funding for water-related incidents should also be sought from Central Government” as “this Fire Authority bears the burden of providing funding for our flood rescue assets, so often called upon to rescue life.” (see points 5.7 and 5.8 above)	See answer to 5.8 (above)



HEREFORD & WORCESTER
HWFR
FIRE AND RESCUE SERVICE

Chief Fire Officer/Chief Executive M Yates QFSM MA MCGI DMS MIFireE
Hereford & Worcester Fire and Rescue Service Headquarters
2 Kings Court Charles Hastings Way Worcester WR5 1JR
Tel 0845 12 24454 Fax 01905 357 466 Web www.hwfire.org.uk

12.7

Strong view that “the people of our two counties deserve a Fire and Rescue Service which is up to a standard, not down to a price.”

The Service will continue to provide a high quality service, despite reduced funding and resources.

I would like to take this opportunity to thank you for your detailed consultation response. Your comments have been most useful in helping to shape the Service’s final recommendations to the FRA.

I appreciate that there are a number of difficult issues contained within the CRMP but hope that we can continue to work closely together in order to deliver the outcomes.

Yours sincerely

John Hodges
Assistant Chief Fire Officer



PREVENTION PROTECTION INTERVENTION
To make Herefordshire and Worcestershire safer from fire and other hazards and to improve community well-being.



HEREFORD & WORCESTER
HWFR
FIRE AND RESCUE SERVICE

Chief Fire Officer / Chief Executive M Yates QFSM MA MCGI DMS MIFireE
Headquarters 2 Kings Court Charles Hastings Way Worcester WR5 1JR
Tel 0845 122 4454 Fax 01905 357 466 Web www.hwfire.org.uk

11th February 2014

Private & Confidential

Telephone: 01905 368248

Mr Keith Wildig
RFU Chair
Hereford & Worcester Fire and Rescue Service
Ledbury Fire Station
Bye Street
Ledbury
Herefs HR8 2AG

Dear Keith

Consultation on the Draft Community Risk Management Plan 2014-2020

I advised in my letter of 10th January 2014 that we would provide you with further comments on the main points raised in your consultation submission. Using your report as a template, we have addressed the points raised in order and referenced the appropriate sections of your report. Where any points were raised on more than one occasion, we have made a cross-reference in this response.

For ease of reading in the following sections, we have highlighted the main points in your submission in blue, while our responses are in black. We have summarised as far as possible.

1.0	Introductory paragraphs – main points	HWFRS response
1.1	Concern that the RFU has not been formally consulted on the draft CRMP document, with a further concern that “this oversight, intentional or otherwise, has led the RFU having to obtain data and background information through its own efforts without the benefit of what should be provided through formal consultation given the established relationship with the service.”	The RFU were consulted on the proposals – representatives were briefed by senior managers on 23 rd September 2013 when it was made clear that the Service welcomes and very much values the RFU involvement in these matters. All information has been publically available on our website and we immediately responded to all other requests for additional information.

2.0	Shared Resources – main points	HWFRS response
2.1	Concern that while the consultation document refers to sharing resources with the local authorities, it provides “no evidence that the service has seriously researched the possibility of working more closely with neighbouring FRS.” The RFU is aware of the	The Service has been working in collaboration with neighbouring authorities for some time (eg. Fire Control project with Shropshire FRS) and is continuing to explore a variety of collaborative options with both Shropshire & Warks FRS and across the West Midlands generally. These are



PREVENTION PROTECTION INTERVENTION

We will provide our communities with sustainable, high quality firefighting, rescue and preventative services



	potential to open talks with Warwickshire FRS on future collaboration/amalgamation, “but we question why a business case hasn’t already been formulated before proposing to close frontline fire stations.”	unlikely to yield significant savings within the timescale necessary to address the Authority’s immediate financial pressures but will hopefully contribute towards any savings required to meet future public sector spending reviews.
2.2	View that “collaboration with other services on procurement might also significantly reduce expenditure” and that “we are convinced that more can be done to achieve economies of scale by closer working.”	See above, these opportunities are already being explored and will be taken to address future potential cuts if efficiencies can be realised alongside those needed through the CRMP
2.3	Concern that “local taxpayers will never be convinced that their station has to close because the service chose not to explore all possible means of reducing cost and they have lost a valued resource in the process.”	See above, the CRMP forms less than £2m of efficiencies from what is likely to be over £7m within the anticipated and recent period. All other options are being examined to meet the overall gap and are not instead of the CRMP proposals.
2.4	View that “the proposals have an affect on the wholetime establishment levels in order to attain savings to the budget, and given the large sums involved, this is the only realistic way of achieving it.”	The wholetime establishment has already been reduced significantly and the CRMP alongside other reviews (uniformed staff not on fire stations) will see further significant efficiencies within the wholetime compliment of staff. The CRMP also appropriately highlights efficiencies within the retained sector.

3.0	Top-heavy management? – main points	HWFRS response
3.1	View that while the Service has reduced the number of Station Managers, not all Station Managers are responsible for a fire station, when “notably the normal practice in HWFRS is that a Station Manager will be responsible for three fire stations.” With a cost of “approximately £39,000 per year plus on costs”, the RFU questions whether there is “actually a need for so many managerial posts” and that this is in addition to “three Brigade Managers, three Area Managers and nine Group Managers.” Added concern that “some of these posts incur an additional 20% allowance for their ‘flexibility’” which questions “whether there is an alternative way to ensure the availability of its managerial employees other than incurring an additional 20% wage increase to what is already a healthy salary.”	<p>There are only 8 substantive Group Managers, not nine funded by the Service directly.</p> <p>The Service has already reduced the number of Brigade Managers and flexi-duty officers over recent years. A further reduction in the number of flexi-officer posts is anticipated as part of the non-front line savings identified in the Authority’s medium term financial plan. This will be in addition to, not instead of savings proposed in the CRMP. .</p> <p>The flexible duty allowance for those posts offer extremely good value and provides resilient 24/7 command and specialist support for operational incidents. Specialist command is foremost in ensuring firefighter safety.</p>
3.2	Concern that “as some of these ‘managers’	All uniformed managers carry out operational



are used for non-operational activities such as training, fire safety, operational logistics, etc., raising a question “as to whether these roles could be undertaken by civilian staff at a much lower, more realistic salary?”

duties as part of the Service’s command structure and are essential for operational resilience and firefighter safety, regardless of their other roles within the organisation. Wherever appropriate, the Service already employs non-uniform staff where operational knowledge or experience is not required. There are many examples of this across all departments within the Service

4.0	Reserves? – main points	HWFRS response
4.1	View that while a Self-Rostering System, as being introduced at Bromsgrove, the consultation does not reveal “whether consideration has been given to applying this alternative duty system in a phased approach to the stations at Hereford, Redditch and Worcester.” The RFU suggest that “significant savings in excess of £450k per station could be achieved with no loss of effective response when calls are clearly reducing year on year.”	Following the introduction of such a system at Bromsgrove, these options will be further explored as part of future funding gaps beyond 2016/17. It must also be noted that the Bromsgrove type systems rely on staff voluntarily signing out of the working time directive and existing staff cannot be forced to work this system due to the overall hours spent at work (on site).
4.2	View that “two-pump RDS stations provide service wide resilience and the majority of costs are mainly incurred when alerted incidents” and concern that by reducing the number of second pumps “introduces risk to such resilience because it then places an obligation on nearby single pump stations to provide support – assuming they are available.”	The service does not dispute that this reduction would affect resilience in the future, however this must be considered alongside available resources to fund such resilience.
4.3	RFU suggests that other FRS have replaced second pumps on two-pump RDS stations with smaller vehicles “utilising new technology and having off-highway capability” and adds that they have “a lower initial capital cost and reduce future investment in standard water tender ladder replacements.”	This option would not achieve any significant revenue benefits as the number of staff would be unlikely to reduce. The Service has a fully costed smaller ‘rural’ appliance option for procurement once fire cover decisions have been taken by the FRA.
4.4	Concern that “single pump stations earmarked for closure run the greatest risk especially those on the service’s boundaries with other brigades.”	This is acknowledged (although it doesn’t prevent closure when looking at the evidence and overall impact) and the better than expected financial position has enabled this to be reflected in the recommendations to the Authority.
4.5	Concern that the “current financial pressures apply equally to bordering services, who may in turn have to make their own decisions to close	Cross-border support to and from neighbouring Services will continue to be provided where available but the proposals in the CRMP do not



stations which will then remove or reduce over the border support.” RFU adds that “a different type of appliance could be tailored to the local risk and would reduce costs and pressures on future capital expenditure.”	<p>rely on neighbouring services in order to provide adequate cover within Herefordshire and Worcestershire.</p> <p>This Authority must have regard to its own resources and the needs of its own area. Neighbouring services will do likewise. All neighbouring services have been consulted and we are consulted about any changes they may propose.</p> <p>As previously indicated, we do not agree that a different type of appliance would generate significant revenue savings.</p>
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

5.0	Call Management – main points	HWFRS response
5.1	Concern that while “it is noted that at a number of stations, the rate of false alarm calls being attended is quite high, yet nothing in the document points to any measures being taken to reduce this figure.”	A separate IRMP in the previous year has addressed this and been published. As a result of actions already taken, the number of false alarm mobilisations has been reduced significantly. The Service will continue to seek efficiencies in its mobilising procedures.
5.2	Concern that it appears that “a higher, yet unmanaged level of false alarm calls can be used to justify the status of a station ie wholtime v RDS,” with Evesham fire station highlighted as an example “with almost 50% of calls received being false alarms.” The RFU argues that “if these were to be managed down from the current number ... it would be a number that is manageable for a fully On-Call response.”	Overall current and historic call volume, regardless of type and risk has been a primary consideration in this review. It is acknowledged that further reductions in false alarms calls would be beneficial to resource allocation.
5.3	With regard to Evesham fire station, the RFU questions whether “the current day crewed status can be justified and if not the station should revert to On-Call thereby reducing costs further.”	All the day crewed stations also provide significant support for technical and complex specialist skills (which are part of the Service IRMP) which have historically been impossible for retained staff to maintain. This consideration in the overall costs of any day crewed station must also be considered. Our current three stations on this system are considered appropriate. However the position will be kept under review.



6.0	Knight report – main points	HWFRS response
6.1	The RFU appreciates Sir Ken Knight's report acknowledges the significant reduction over time in calls particularly fire deaths, and that "the On-Call element of fire cover is something that requires investment and expansion."	Sir Ken Knight's report has to be read in the context of the UK fire service as a whole. Unlike some services, This Service is fully committed to the retained on call model and currently 77% of appliances are crewed by retained on call staff. This year's budget contains additional resources for RDS training.
6.2	The RFU notes that the On-Call system does need investment, but "not necessarily financial." It asks how the Service is addressing the issue of recruitment and retention in the On-Call system, questions if the Service is arguing against the evidence that fire deaths are reducing, and notes that the time spent on operational activity "is now less than 7%."	The Service is fully committed to investing in the retained and currently leads the country in this development and contributions to the retained sector. We have previously implemented a 3 year improvement plan for RDS, including having a dedicated Recruitment Officer who continues to work with the RDS Officer-in-Charge Working Group to develop new ways of improving RDS recruitment. It should also be noted that many of the innovative support roles in place for RDS staff are currently not under threat of reduction as they Service recognises the importance of supporting the retained sector.
6.3	The RFU questions whether the prevention and educating work on the dangers of fire and other risks carried out by the Service over the years "are somehow worthless, and of no benefit at all and not a driver for change in the way response is provided, especially in the smaller towns in the service area."	Prevention and protection work in HWFRS has now been significantly rationalised and is dedicated to targeting the most vulnerable only. The retained staff in HWFRS do not undertake any community safety work as this is not cost effective as the hourly rate is more than a non-uniformed specialist. The community safety resource allocation has been reduced and will most likely be rationalised further in the future. The Service does not however agree with your statement and believes that targeted community safety work is paramount in preventing injuries and deaths amongst those most vulnerable in our communities.
6.4	The RFU notes that there is one reference to the Knight report in the CRMP and that it claims to have "explored all possibilities of making the necessary savings Sir Ken refers to" but argues that "this is clearly not the case as there is no reference to how the service plans to increase and better utilise its On-Call employees." Nor, it argues, does the CRMP make "reference to more modern	See previous answer above. The Service is committed to investing in our retained sector and currently 77% of existing appliances are crewed by retained staff and retained staff often make up resilience duties to crew <i>wholetime</i> appliances. Sir Ken's report is also directed at the majority of service's that have less (by %) on call staff than H&W.



methods of crewing front-line appliances.”

A new day crewing plus system is to be introduced at Bromsgrove and consideration will be given to extending this to other locations.

7.0	Alternative duty systems – main points	HWFRS response
7.1	Concern that while the CRMP claims that the Service has explored the use locally of alternative duty systems, questioning “how valid this statement is as it is clear to us that focusing on local risk and current call levels there are better, more cost-effective duty systems that can be used within HWFRS than are being proposed.”	<p>The Service believes that the current duty systems reflect the pattern of risk across the two counties and provide appropriate levels of resilience. It is noted that the RFU disagrees but no specific examples or proposals have been made.</p> <p>In drawing up the CRMP proposals a number of alternative options were considered including creating crewing hubs, extension of day crewing plus or self rostering arrangements. However, many of these approaches are unproven and some would potentially reduce overall resilience across the Service. This could in turn have a detrimental impact on RDS crews.</p> <p>We continue to monitor innovative arrangements that may be introduced elsewhere will to keep the position under review.</p>
7.2	Repeated query as to why self-rostering is being proposed at Bromsgrove and not elsewhere. (see point 4.1 above)	Consideration will be given to this once the full impact of its introduction at Bromsgrove has been assessed and evaluated. Please note the ‘voluntary’ nature of this system.
7.3	View that the ‘224 duty system’ is dated, and that statistics from the busiest fire stations show that “call levels do not justify the current costs using the 224 duty system, and could be responded in a more cost-effective manner.”	See comments above.
7.4	RFU considers that “call management also needs reviewing as the number of false alarm calls is far too high.”	This is due to undergo further measures at source (Control) to filter to a greater degree. This was postponed due to the implementation of a new fire control system in 2012/13. The Service agrees with this point and will review the matter again in the future to target further reductions of false alarm calls.



8.0 Retained Recruitment and Resilience – main points	HWFRS response
<p>8.1 View that if the availability of On-Call appliances is “a shortcoming in the overall provision of emergency response,” if it could be improved this would help to address issues elsewhere in the Service. RFU suggest that the relationship between the Service, the On-Call employee and their primary employer “becomes a cornerstone of service provision.” It argues further that the Service “should not be allowed to get away lightly without challenge” on this issue until it can “demonstrate that all possible avenues for improvement have been explored and implemented.”</p>	<p>The Service agrees and already considers the retained appliances to be the “cornerstone” of the Services availability with a retained unit at every fire station. The Service also considers its overall retained availability to be very good and will continue to invest in improving this at all remaining retained units, in fact this is a bedrock of service delivery strategy.</p>
<p>8.2 View that the FRS should publish details annually of the length of time frontline appliances are off the run and the reasons for the unavailability, plus the number of staff at each station. RFU argues that this would “provide transparency to the local taxpayers as to how well their FRS is being run (on not as the case may be), raise awareness of vacancies at On-Call stations and provide a major incentive to become more pro-active in terms of the recruitment and retention of On-Call staff.”</p>	<p>This data is already published for retained appliances as part of the quarterly performance monitoring reports to the Authority, which are available to the public via the website. There is no corresponding report for wholetime stations as the figures are negligible with appliances being continually available.</p> <p>The Service has several on-going innovative strategies as well as engagement at the national CFOA level to develop retained recruitment.</p>
<p>8.3 In relation to point 8.2 above, the RFU consider that “the input and scrutiny by members of Fire Authorities is crucial.” It argues that “if RDS pumps are off the run on a regular basis, elected members should be made fully aware” and they should “challenge senior management on what action is being taken” to address this. RFU adds that members should also be involved in identifying solutions.</p>	<p>See above – Fire Authority members are already aware of this information and take a keen interest in it.</p>
<p>8.4 View that the Fire Authority should have a “lead member as an ‘RDS Champion’ who would raise awareness and the status of this duty system at all levels.”</p>	<p>Authority Members already take a keen interest in matters affecting the retained stations and are regularly updated on issues affecting them. Officers of the Service and FRA Members value all employees regardless on conditions of service or duty system and wouldn’t wish to have a champion for one set of employees but not others.</p>



8.5	View that data should be used more to help to increase efficiency. Suggestion that the Service should interrogate the data held and create comprehensive station profiles for all On-Call stations including those appliances attached to shift or day crewed stations.	This is already done.
8.6	Concern that “stations have funded establishment levels” but vacancies remain unfilled, and “do they remain unfilled because the funding is being diverted elsewhere for some other purpose?”	This is an incorrect perception, retained stations in HWFRS do not have funded fixed establishment levels, we will recruit the necessary staff giving the appropriate cover to meet the needs of the station but within an overall Service budget.
8.7	View that the Service should be aware of local businesses that already release RDS staff and that it should “make every effort to identify and engage with other sources of primary employment, including reaching out to those who work from home.”	The Service has invested considerable resource into improving RDS recruitment through a 3 year improvement plan and now has a dedicated Recruitment Officer in HR who, among other things, has been working with the local Chambers of Commerce to raise awareness and develop opportunities for retained firefighters. The Service also has an award category to recognise RDS primary employers at its Service awards evening.
8.8	View that the Service should make sure that potential employers are made fully aware of the many benefits of releasing staff to RDS. RFU is not aware of any FRS that has adopted this approach, and suggests that HWFRS may like to be the first.	The Service is actively doing this
8.9	View that the Service needs to make sure that the absence of RDS staff from primary employers is “as brief as operationally possible,” and there should be a clear “main point of contact” who can liaise with the employer should any difficulties arise.	The Service understands this well with its predominant retained workforce and retained history, and tries to accommodate this when possible. One of the reasons for the cautious approach towards introducing possible new duty systems (above) has been concern about this very point.
8.10	View that a further incentive to local businesses could be the use of a “tax break proportionate to the number of occasions their staff are alerted and respond.”	The Service has already begun exploring this with local authorities.

9.0	Question 1 issues facing our two counties – main points	HWFRS response
9.1	View that changes to population and environment need to be monitored on a	The Service does this.





	regular basis.	
9.2	Concern about the economic situation and the need for the Service “to identify appropriate, costed, cost-effective solutions on how to provide an emergency service that is fit for purpose.” Further concern that the CRMP proposals are not “to the benefit of the local communities under best-value.”	The Service already believes it does this and further believes it is offering the appropriate response based upon risk and against available resources.

10.0	Question 2 Financial issues facing the Fire and Rescue Authority – main points	HWFRS response
10.1	Concern that “the proposals do not provide the tax-payers with value for money” and that “there are more cost-effective methods of providing an emergency service that the Service fails to evidence that it has explored or why it is not appropriate.”	The proposals are not only about cost as this also has to be balanced against risk and the overall resilience of the Service.
10.2	Concern that “while call levels have decreased dramatically the proposals include removing the most cost-effective resources whilst at the same time maintaining a ‘gold-plated’ service in some areas (Evesham, etc.). Why?”	The ‘least expensive’ is not necessarily the most ‘cost effective’ once overall resilience and other factors are taken into account. Evesham Station provides a more immediate response during the daytime and guaranteed response at night as well as providing specialist water rescue capabilities.

11.0	Question 3 Understanding risk – main points	HWFRS response
11.1	View that calls have decreased over the last ten years is due to “the improved prevention initiatives that have been undertaken and improved technology in house building and car design.”	No comment, the Service agrees to some extent with this statement
11.2	Concern that “if the prevention initiatives are removed we expect call levels and fatalities to increase.”	We will not be removing prevention activities, but will be dedicated to targeted activities only, based upon sound data and professional judgement.

12.0	Question 4 Tackling risk – main points	HWFRS response
12.1	<u>Prevention</u> : concern that the Service “doesn’t explain how it undertakes prevention activities cost-effectively” and that “we would welcome further explanation on this point.”	As explained above, we target those most at risk and vulnerable in our communities, alongside robust and effective partnership work. We always welcome comments from the RFU and there are regular opportunities for this





		engagement.
12.2	<u>Protection:</u> view that while the CRMP refers to legislation already in place, it “could have expanded on this point much further to demonstrate how its activities have proven to protect businesses in the past.”	No comment
12.3	<u>Response:</u> concern that while the CRMP “claims that it has carried out an extensive review of its emergency response arrangements” and that “the proposals are the best it has come up with” “there is no evidence to support this.” RFU adds that “this is a bold claim and we dispute it” and that the proposals “are not in the best interests of the public and do not provide best-value.”	The purpose of this consultation was to challenge our assumptions and proposals and offer all stakeholders a chance to not only dispute the CRMP, but offer alternative /better options. Whilst the RFU does not agree with the proposals in the CRMP, it has not offered any tangible alternatives. The CRMP contains significant evidence for the proposals and therefore refutes that there is no evidence to support.
12.4	<u>Resilience:</u> concern that if the proposals are implemented they “will have a detrimental affect on the service’s resilience. RFU add that On-Call appliances “provide the most cost-effective means of resilience” and asks why the Service “proposes to remove these vehicles.”	The Service fully accepts that a reduction in frontline resources will affect resilience and response to a small degree, it is believed that the CRMP proposals mitigate this to the lowest possible level and have supplied data to support this.

13.0	Question 5 Delivering Our Services – main points	HWFRS response
13.1	View that the Service “does have other options but sees the removal of On-Call posts and resources as the easy option” adding that “we do not see any other reason as to why it is choosing to do so when there are more innovative ways of providing the necessary savings.”	<p>The proposed closure of fire stations or the removal of appliances, whether whole time or retained, is never an easy option; nor is it one that is made lightly. It gives senior managers no pleasure to be making these proposals but they are seen as the best way of reducing costs with the least detrimental impact upon the service to the public.</p> <p>Of the total £7m savings that will have been made between 2010 and 2017, 73% will have been achieved in areas away from front line service delivery but given the scale of savings required, it is inevitable that all areas of the Service will be affected.</p> <p>Retained stations cannot be exempt from sharing a proportion of the cuts but of the approximately £2m savings proposed from</p>



	front line services, over £1.5m is proposed to come from changes at whole time stations. The CRMP addresses the anticipated funding gap to 2016/17. However it is likely that further savings will be required as part of the public sector spending review in subsequent years. Innovative service delivery options will undoubtedly be required to address those savings, not instead of but in addition to those in the CRMP.
13.2 RFU accepts that “in some situations it is necessary to remove front-line appliances and even close fire stations” but it is concerned that “all other more modern options have [not] been explored.” RFU suggests that while the proposed removal of front-line appliances at Ledbury, Bromyard and Tenbury Wells saves £135k per year, “it could save double that amount without losing any appliances by just crewing an appliance differently.” Repeated view that self-rostering be looked at. (see points 4.1 and 7.2 above)	As previously indicated, these options will be considered in the light of experience at Bromsgrove but the effect on overall resilience and the potential knock on impact this could have on retained staff are major considerations

14.0 Question 6 Fire and Emergency Cover proposals – main points	HWFRS response
14.1 <u>Proposal 1</u> : view that wholetime appliances need to be crewed in a different way and that “this would provide the necessary savings and might also lead to the appliances still being available.”	See above
14.2 <u>Proposal 2</u> : view that “there is no need to remove any appliance from these stations.” (see points raised at 13.1 and 13.2 above)	The CRMP provides data that demonstrates these savings can be implemented whilst still achieving our attendance standard for the first appliance in most instances. Given that significant savings have to be achieved, the proposals under Option 2 are a means of contributing to those savings with least impact upon the service that is delivered.
14.3 <u>Proposal 3</u> : view that crewing both appliances at Evesham fire station with On-Call staff “would provide all the necessary savings and remove the need to close any station or remove any appliance” adding that	The removal of day crewing from Evesham, Malvern and Droitwich would have a significant impact upon the level of cover available and upon overall resilience across the service. This is not something which the Chief Fire Officer



“the public would also not be put at any increased risk.” Further view that “the type and number of calls responded to by Evesham, Malvern and Droitwich does not warrant a day-crewed duty system.”

could recommend.

15.0	Question 7 What will we see by 2020? - main points	HWFRS response
15.1	Concern that the Service needs to “demonstrate why it is currently using the current crewing models at each of its locations.”	As above and included in the data provided in the CRMP.
15.2	View that the Service needs to “demonstrate what its current and long-term plans are regarding the recruitment and retention of its On-Call employees and thus proving better value for money for its local communities.” (see also points at 8.1 – 8.10 above)	This is not part of the CRMP and the Service would welcome the RFU views and support, however the Head of Operations in HWFRS is on the national CFA Committee with John Barton and regularly discusses this issue with the RFU through this forum.
16.0	Closing paragraph – main points	HWFRS response
16.1	RFU comments that it is “happy to discuss our alternative proposals with the service.”	The Service welcomes the RFU’s comments and is committed to on-going dialogue with each of the Representative Bodies.

I would like to take this opportunity to thank you for your detailed consultation response. Your comments have been most useful in helping to shape the Service’s final recommendations to the FRA.

I appreciate that there are a number of difficult issues contained within the CRMP but hope that we can continue to work closely together in order to deliver the outcomes.

Yours sincerely

John Hodges
Assistant Chief Fire Officer