

Cheshire FBU Response to 'Draft' Corporate Plan & IRMP 2011/2012.

Executive Summary

In responding to the draft IRMP document it remains the intention of the FBU in Cheshire to be supportive of any improvements to the Fire Service and to help in improving the service we offer the public. Equally, where we believe proposals within the IRMP will not improve the Service, we will voice our concerns and expect our views to influence the final draft and proposals. We hope, therefore, that any changes can be approached in a spirit of partnership, where modernisation of the way we work and deliver our services can be guided by ministerial frameworks and remain within the spirit and intent of nationally negotiated conditions of service.

Changes proposed in the IRMP8 do directly impact on our members terms and conditions, so to avoid confusion, and to instil a sense of workforce inclusion in these proposals we ask that all matters affecting FBU members be the subject of thorough consultation/negotiation with a view to reaching agreement prior to the implementation of changes to policies, practices and protocols.

The FBU have much to offer the Service in terms of knowledge, experience and ideas to continually improve the service offered to the public and we fully support the need for value for money in the delivery of these services. Fire & Rescue services should involve our officials at the earliest opportunity to help shape the future of the Service to achieve the best possible outcomes.

We do accept that this plan more than ever before will be financially driven, however we do not accept that the plan is necessarily evidence based and that a robust business planning process has been used to arrive at some of the key proposals and to measure their effectiveness.

Currently the only national guidance on how to construct an IRMP is provided by the FBU (a copy has been supplied with this response).

In an effort to assist in this process we make the following preliminary observations to the points raised in the draft IRMP8 document.

IRMP Scoping

We wish to repeat our previous criticism of the IRMP process of the lack of FBU and staff involvement in the development of the IRMP. The national guidance document does advocate FBU and staff involvement and had this been the case, in the early stages of the IRMP process, a number of contentious issues could have been resolved more quickly without conflict and the potential need for dispute resolution. By the time the IRMP proposals are released for consultation, timescales for implementation are already tight and the opportunity for stakeholders including rep bodies to influence the final IRMP is limited to a few weeks. For example, an alternative shift working group was established following IRMP6, however once a decision was made at a Senior level not to continue with 12 hour shifts the working group meetings scheduled throughout 2010 were all cancelled.

Consultation

We are also concerned with the consultation regarding IRMP proposals. Everything is dressed up as an improvement and limited detailed information is given to stakeholders and in particular to members of the public. Only positives are given which then lends itself to a misleading response and not meaningful consultation in the true sense. If a proposal mean part of the service will be reduced or it will take longer for a fire appliance to respond then be clear in the consultation. Then responses can be taken in the confidence that the respondent had all the necessary information, both the positives and the negatives of a proposal.

We question the timing of the IRMP consultation in light of the recent discussion at the Fire Authority member's away day. How can it be meaningful consultation if the budget for the following 12 months is set in February before IRMP consultation has concluded and the Fire Authority has agreed the plan?

Standards of Fire Cover

We have repeatedly voiced our position that we believe the move from National Standards of Fire Cover to local based standards has led to slower emergency response times and has been used as an opportunity to cut front line emergency cover. The local standards are also being used as a target and not as a minimum standard for emergency response

The Cheshire Standards for emergency response do not set out a minimum standard for the full response required to deal effectively, efficiently and safely with emergency incidents. Unlike other North West Fire Services our standards are based only on the time of the first appliance in attendance. Some imaginative ways of improving these attendance times are concerning. The attendance time of a small fire appliance or emergency vehicle that is ill equipped to deal with the incident, may show an improvement on paper but doesn't necessary improve the emergency response or safety. Increasingly and far too often risk assessments are being introduced that require crews to

wait for back up. Non activity is not an option for firefighters under the weight of public expectation.

IRMP7

The FBU would suggest more information is given within the draft IRMP regarding the key proposals from the previous IRMP. Evidence that any proposals that were implemented have been fully evaluated and that evidence presented as part of the consultation of how these have contributed to improvements to public safety.

There has not been any documented evaluation on whether, for example, the on call provision at Wilmslow has been adequate and met the minimum standards.

How many occasions have the response standards been met?

The number of times wholetime staff have been needed to supplement the on call at Wilmslow needs to be calculated. We have figures to show one watch has had to provide cover on 44 occasions from January 2010 to December 2010. If this is the same for all the watches that figure would represent nearly 70% of the year when on call cover was not sufficient.

Forecasted savings

In view that this years IRMP, is dominated with financial savings and budget restraints we would wish to see far more financial information regarding proposals and how the full budget is spent.

On page 8 the document states £1.3 million of savings have been identified, however on page 20 the savings are shown as £1.9 million for the next financial year. Also on page 8, some of the savings within proposals have been identified but there is a lack of detail and do not amount to £1.3 million.

We question why the front line services are again being cut to realise savings. Again the IRMP is about a reduction in firefighter posts. This time the proposals are seen not to impact on the time of emergency response but that fewer firefighters will be expected to work longer in an effort to achieve the same emergency response.

CF&RS has benefited from an increase in Government Grant for the next 2 years and therefore we question why the cuts are necessary at this stage?

It is claimed that 81% of the Fire Service budget is staff related costs and CF&RS have made significant savings through reducing firefighter posts since the introduction of IRMP in 2004. There has been a 15% reduction in wholetime firefighter posts in addition to reduction of Grey Book manager posts.

During this period pay has increased by 12.7% and now has been frozen since July 2009, yet the gross budget has increased by 30% from £33 million in 2004 to £43.4 million.

In the light of the above we question the need to make further cuts to the number of firefighters?

Key Proposals

1. Service Reviews

We welcome these reviews, but question why it will take 3 years to undertake this work.

Shared services have been mentioned in previous IRMPs, however to date the only area where efforts and resources have been directed has been into the Regional Control project. Although the project has been scrapped on a National basis, fire services are still investing time and resources into continuing as a Regional project.

Whilst we have seen a reduction in firefighter posts, this has not been reflective with non-uniformed posts within CF&RS. The number of non-uniformed posts more than doubled between 2006 and 2009, from 116 to 249. We believe this increase has continued since we last requested this information and would be interested to see the change in the balance between front line staff and backroom staff.

2. Joint Community Safety Advocates

The FBU welcomes the intention to save the 3 advocate posts, however CF&RS should ensure that the costs are shared with relevant partners for community work undertaken, particularly any work that is not a statutory duty of the Fire Service or does not contribute to public safety.

Evidence has shown whilst resources are directed into an initiative, success can be seen, but as soon as those resources are removed or reduced there can be a negative impact. Therefore we suggest caution with regard to the reduction in the HSA programme and wish to see a mechanism to evaluate this change.

3. Improving Road safety

Whilst the FBU support improvements in road safety programmes, we again suggest caution with commitments to initiatives that the Fire Service do not receive funding for and are not a statutory Fire Service duty. We do however agree the Fire Service should be key in this aspect of public safety and efforts should be made to secure funding on that basis.

We are concerned that financial cutbacks will possibly limit our partners ability to support road safety programmes and we must ensure CF&RS does not increase it's funding to make up for any shortfalls.

The draft IRMP claims that the current education programmes have contributed improvements in road safety. We would wish to see evidence within the IRMP to support this.

4. Improving Business Safety

The FBU offers a similar comment to previous initiative, we support exploration of this initiative but do not agree that the Fire Service should expand its role with the business community without the necessary funding.

5. Macclesfield Community Fire Station

The Fire Brigades Union strongly oppose this proposal to introduce a system known as day crewing plus (DCP). This duty system is not suitable for Macclesfield Fire Station, it has not been identified as a station of low risk or low activity. The system is not family friendly, it discriminates against staff with child caring responsibilities and requires staff to agree to 'opt out' of the working time regulations.

There is total opposition from the Macclesfield staff. They do not wish to be at work for an average of 84 hours per week. If Macclesfield staff do not volunteer for this system they will be faced with increased daily travel to work across the county.

The proposed duty system does not meet the principles set out in the National Conditions of Service (Grey book) Section 4 Part A paragraphs 3(3) and 3(4).

3(3) It should comply with relevant United Kingdom and European law, including the Working Time Regulations 1998, and Health, Safety and Welfare at Work legislation.

3(4) It should have regard to the special circumstances of individual employees and be family friendly.

We question how the change to Macclesfield has been identified as to our knowledge CF&RS have not undertaken a Fire Cover review. A Fire Cover review should take place before drafting proposals. The proposals are being seen to fit in with the financial review not visa versa. Macclesfield has been targeted purely on the basis that it is believed to be the quietest of the remaining shift stations and we do not believe Macclesfield's wholetime pump has the least activity. The reduced staffing on aerial appliance to driver only, will now impact on the pump's activity levels, as the pump will be mobilised with the aerial on each occasion it is required.

Previous IRMPs have provided data on station activity levels, however Macclesfield certainly was not identified as a station of low activity. There is no specific mention of the Macclesfield proposal in the 4 year plan published in late 2010, only a general reference to an intention to look at proposals which are based around the day crewing system.

We do not agree with the data (based solely on activity for 2009-2010) that has so far been presented, these figures are 25% below the true activity levels. This does bring into question the claim that the Service can predict with increasing accuracy when and where emergencies are likely to occur.

The draft IRMP states "In the last few years the number of fires and emergencies attended by crews from Macclesfield and other areas has continued to reduce". This is not true and our information is that the total calls to Macclesfield have increased from 893 (2008-2009) to 918 (2009-2010) and calls dealt with by the wholetime pump crew from 857-867.

Equally no evidence has been presented to demonstrate a reduction in the risk to the community of Macclesfield, to support this proposal.

Macclesfield borough was the largest borough in Cheshire with a population in the town alone of over 50,000 residents and the remaining outlying parishes (54 in total 2 of which are un-parished areas[Macclesfield & Wilmslow]) having a total population in the borough of in excess of 140,000 residents covering a total area of over 52,000 hectares. This changed in 2009 when Cheshire East formed which is now the 3rd largest council in the North-West.

Macclesfield has and still is a very prosperous market town it was once a very important mill town producing silk for the world market, today it again is in the world market with the chemicals industry of pharmaceutical drugs produced by AstraZeneca (a large COMAH site). Many other large companies are situated in Macclesfield creating a variety to all industries.

Macclesfield has many tourist attractions attracting thousands of people to the town these include Macclesfield Forrest, Capesthorne Hall, Peak District, Gawsworth Hall, Silk Museum plus many others. To add to the numbers of people who regularly visit the town are home and away supporters of Macclesfield Town FC (6,000+ capacity with a new stadium approved) in NPower League Division Two and Macclesfield Rugby Club (1000+ capacity) in National Division 1. Macclesfield's nightlife is extremely popular with over a hundred restaurants and pubs including several night-clubs open through out the night.

Macclesfield District General Hospital provides a vital 24/7 Accident & Emergency ward, as well as provides care and treatment to several hundred out-patients per week.

Macclesfield town centre is under review and plans are for a multi million pound overhaul hoping to attract thousands of shoppers to the area.

Macclesfield's old mills are part of the many heritage sites as well as been converted to residential and commercial places some converted to both.

Macclesfield also has two of the most notorious roads in the country in 2010 the A536 "Cat & Fiddle Road" was named the UK's most dangerous road in a survey carried out by the Road Safety Foundation and the A54 from Bosley to Buxton was also quoted as one of the highest risk roads in Great Britain by EuroRAP (European Road Assessment Program).The other at risk transport links that pass through Macclesfield are the main London to Manchester Rail link and the main stacking and flight paths into Manchester International Airport.

Macclesfield also has a very large elderly population compared to all other areas of Cheshire.

In comparison to St Anne's and Penwortham in Lancashire; Macclesfield is twice as big in all aspects.

Population:

Macclesfield 50,688 (urban) 150,144 (district)

St Anne's 27,490

Penwortham 23,436

Station Boundary sizes in miles:

	North to South	East to West
Macclesfield	8.9m	13.5m
St Anne's	5.5m	10.2m
Penwortham	5.6m	10.4m

Nearest 24/7 Whole-time station:

Macclesfield Crewe 21 miles away & Warrington 26.4 miles away

St Anne's South Shore 4.1 miles away & Blackpool 5.8 miles away

Penwortham Preston 3.8 miles away and Blackburn 11.6 miles away

Nearest Day Crewing station:

Macclesfield Wilmslow 8.6 miles away & Congleton 8.1 miles away

St Anne's None probably due to proximity of South Shore, Blackpool & Bispham

Penwortham Leyland 4.5 miles away & Service HQ (Fulwood) 3.3 miles away

Nearest On-call (part-time) station:

Macclesfield Bollington 3.8 miles away & Poynton 8 miles away

St Anne's Lytham 4.1 miles away & Wesham 9.4 miles away

Penwortham Bamber Bridge 2.8 miles away & Tarleton 8.7 miles away

Lancashire Fire & Rescue did undertake a full fire cover review before embarking on introducing DCP. The station areas where Lancashire proposes the change do not compare with Macclesfield's profile. Macclesfield is far busier than the Lancashire stations, provides emergency cover to a far greater population and covers far more risk. Each of the Lancashire stations has the benefit of having a number of wholtime pumps only minutes from their station, whereas Macclesfield does not.

Lancashire has used a formula for identifying potential DCP stations based on limited risk and activity. The formula is based on the number of dwelling fires, casualty rates, other building fires and areas of multiple deprivation and we would be interested to see how Macclesfield would score using this formula.

The staff displaced in Lancashire were given excess travel expenses for the remainder of their careers and each station has a cook to ensure the crews receive a meal during their 24 hour shift.

The activity levels at Macclesfield would also impact on the community work undertaken by the crews as they will be entitled to more recovery time as their Lancashire counterparts and this is in addition to the reduced positive hours that will be available for community safety moving from the 4 watches. Reduced resources into community safety will undoubtedly have a negative impact on community safety.

The number of occasions that stand-by appliances go into Macclesfield will also increase as in Lancashire the watch manager has the discretion to take the pump off call, if the crews have been busy throughout the stand-by time.

We believe on DCP is outside the working time regulations regardless of how many additional positive hours staff will work when called out during the stand-by hours. It differs from the Day Crewing and On call, because staff are conditioned to their place of work. Lancashire FBU has put the Service on notice that should the option of 'opt outs' by staff cease by a European Directive then DCP would no longer comply with the law.

Current Service policy (SIS 9/1/12) is not to support 'Opt Outs' from the working time directive and we would wholly encourage the Service to continue with that policy as it is there to protect workers from working excessive hours and by doing so ensure compliance with health and safety legislation. Firefighter's carryout risk critical activities and health, safety and welfare should be the foremost consideration and working time regulations are there to protect workers safety.

On the 3rd October 2000 a judgement was passed at the European Court of Justice in a case concerning the status of 'on-call' time. The judgement relates to doctors employed in primary health care teams though a similar approach may now be taken in other areas. It indicates that 'on-call' time will be working time when a worker is required to be at their place of work. When a worker is away from the workplace when on-call and accordingly free to pursue leisure activities, on-call time is not 'working time'.

The FBU also questions the estimated savings within the IRMP document. Macclesfield currently has an establishment of 7 per watch following the change the way the aerial is staffed down to driver only. We have been informed the cost per firefighter with add on costs is approximately £35K and by reducing the establishment by 12 to 16 posts, this would realise an initial reduction of £420K, however with the additional allowance of 32% paid to the 16 staff, equalling over 144K the total savings would be nearer to £276K not the reported £350K.

Staff at Macclesfield are concerned about their futures and are keen to explore an alternative to DCP and have suggested a 2 days on 4 days off system (56 hour week). Staff would receive an allowance of 16% (half that proposed by Management). This would realise a saving of £280K with the allowances costing £108K leaving a total saving of 172K. As their trade union representatives we remain sceptical of such a proposal as again this is potentially outside of the working time regulations.

Although estimated financial costs have so far been provided, we are yet to see a comprehensive business case for DCP. The FBU believes there are not only financial implications; there are legal implications, equality & diversity implications and environmental implications. We therefore request a copy of the business case and the equality impact assessment.

6. Joint Management in Halton and Warrington

The FBU support this proposal providing the frontline services are not compromised in these areas of high population. Workloads for managers will need to be closely monitored and support provided from the centre as the changes are implemented. We do not expect this proposal to reduce the operational cover but are interested to know how the current arrangements will be maintained.

Conclusion

The FBU is disappointed and dismayed that the Service are intending to make cuts to front line and support staff jobs, following the favourable 2 year financial settlement relative to other Fire & Rescue Services. The FBU are totally opposed the implementation of Day Crewing Plus at Macclesfield.

Should you require further clarification regarding the points raised in this submission, please do not hesitate to contact a Brigade Official.

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