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This is the official response of the Fire Brigades Union who represent 800 Firefighting staff in Lancashire. The Fire Brigades Union (FBU) was formed in 1918, and has been a Professional, informed voice on the fire service nationally since its inception. As with any Trade Union, our duty is to look after our members and to ensure their lawful rights are protected at work.

Supporting our members and defending the service provided for the public are inextricably linked. For example, if we lobby for and are successful in obtaining more or better equipment for our members to use, the service that the public receives is undoubtedly enhanced.

If we campaign to prevent station closures or the downgrading of fire cover it is not only to protect the jobs of our members, but also to prevent a delay responding to a 999 call, saving more public lives and reducing risk to Firefighters.

We are realistic about the current demanding financial position and the need to make appropriate savings. However, it is believed that the service in Lancashire has been cut to breaking point and that LFRS needs more investment in front line staff to keep fire engines on the run.

All these changes will impact upon and reduce the service delivered to the communities of Lancashire and further impact the safety of Firefighters.

The service has already lost over 33 % of its staff over the last 9 years. We are riding fire appliances with minimum levels of staff which puts crews in a dangerous moral dilemma of committing to incidents before adequate resources arrive. A reduction of service to the community will increase the possibility of a firefighter injury or death.

Our on-call service is more thinly stretched than ever with serious issues regarding recruitment/retention and availability of crews.

We are also finding more and more Dual Contract staff on Zero Hours Contracts, which was not agreed and was turned down by Lancashire FBU in a formal request by LFRS.

We welcome further debate or discussion on the proposals and our response to them and invite the Combined Fire Authority (CFA) to sit down with the Fire Brigades Unions and listen to these concerns. The FBU thank you for taking your time to consider this document.

The reader will note that despite the Integrated Risk Management Plan (IRMP) being a consultation document, and that the FBU represents what can be described as the key stakeholder, that there is not one single mention of the FBU in the entire document.

## **What an IRMP should be**

The FBU supports the principles of IRMP's and have written a detailed document for managers & members of Fire Authorities within the UK Fire & Rescue Service that helps guide them through the process.

The Integrated Risk Management Plan (IRMP) should be based on the predicted and non-predicted risks facing Lancashire and its neighbours.

We do not understand the re-naming of this process to a Community Risk Management Plan. It dilutes the meaning of the process.

## **General comments on the CRMP.**

At present, the first appliance is only meeting the 6 minute response time 88.31% of the the time.

The FBU remind the reader that the response standard set by LFRS is one in which by policy it is acceptable to fail on one in ten incidents.

There should be a target, first attendance being 6 mins 100% of the time and crewing and resources expanded to achieve this.

The majority of this plan seems to only continue and maintain what is in place already. It is not clear what has been identified and how it will be addressed. For example, the section on the new emerging risks in relation to lithium ION batteries, it has been identified as a risk but there is no mention of fire plans to address this, nor of training for the crews in how to deal with these incident types bearing in mind that a Firefighter has been killed at a fire involving a site like this.

Pandemics were a known national risk even before the Covid outbreak and this was ignored at a national level. There is a risk of further outbreaks from mutations or even a new virus. One essential control measure would be the allocation of individual breathing apparatus face masks that would assist in mitigating transmission.

Fire prevention is a key theme throughout the document to try and reduce fires, but there is no mention of how the service and the CFA could enforce sprinkler systems in all new builds - domestic and industrial, and especially schools.

## **Primary fires**

We will always have building fires and unfortunately some of these will involve persons trapped in those fires. We must maintain a resource wherever we can with sufficient crewing to



adequately deal with the risks faced. We must be wary in a time of continued austerity that we do not risk the health and safety of staff and the public in the drive to reduce costs.

Crewing levels on appliances need to be maintained at 5. We are now seeing minimum crewing as 4 becoming the norm. Three-person crewing is dangerous and should be assessed through the IRMP. Efficiency is not just about cost reduction; it is about working smarter.

### **Collaboration and partnerships**

The Policing and Crime Act may place a legal duty on blue light services to collaborate, but the FBU wish to point out again that certain duties of what LFRS are wanting operational staff to take part in with assisting other agencies does not come under the Firefighter role map.

LFRS are looking for extra funding by carrying out the work of other agencies, while North West Ambulance Service and Lancashire Constabulary are also looking for funding to help extra resources for the services that they provide to the Lancashire Community.

This Collaboration work should be consulted on with the FBU nationally.

### **Equality Diversity and Inclusion**

The Equality and Diversity implications have not been addressed at all. Lancashire unfortunately has areas of lower social/economic population that will be disadvantaged from a blanket policy like the one being proposed.

### **Reduced Attendances to Automatic Fire Alarms (AFA)**

Lancashire Fire and Rescue Service (LFRS) is considering the operational decision to reduce or cease emergency attendances to Automatic Fire Alarm (AFA) actuations at certain premises. We further understand that although this initiative has been in place for some premises (or group of premises) this has been extended to other premises which may include local government buildings and schools.

The FBU would be grateful if you could confirm which premises will have a reduced attendance to an AFA actuation and which premises attracts no attendance.

The FBU would also be grateful if you could confirm you are complying with the CFOA Guidance for the Reduction of False Alarms & Unwanted Fire Signals (UwFS). We appreciate that the document is guidance rather than a protocol but as it is a guidance document circulated by the organisation I presume you are a member of it seems appropriate that you would intend to give it due regard. Indeed the associated Code of Practice sets out a clear expectation that all F&RS's would adhere to the guidance promulgated by CFOA.

For example, the guidance reminds the reader and F&RS's that:

*'The clear benefits that AFA systems can offer is not disputed. The early warning of fire is essential to protect both life and property and research has proved that AFA-detected fires tend to be smaller than person detected fires and generally require less effort to extinguish when the FRS response arrives. This also assists with protecting business assets, business continuity and community resilience.'* (Sect. 3, page 5)

We are sure you would regard that as a non-controversial statement and that you would readily agree to the principles CFOA refers to. The Fire Brigades Union contends that AFA detected fires only remain small as long as timely and appropriate emergency response arrives to safely and speedily resolve the incident - what is often referred to as the speed and weight of attack. Evidently that speed and weight of attack will not be provided if there is a reduced or nil response to the actuation.

The guidance goes further and states that:

*'The guidance outlined in this document has been widely consulted and developed with stakeholders representing the fire alarm industry and FRS in order to reduce the occurrence of false alarms from automatic fire detection and fire alarm systems and to manage the appropriate FRSs response to UwFS.'* (Sect. 4, page 6)

The FBU presumes that consultation would include LFRS but if not that you would pay due regard to the views as contained within the guidance.

The guidance goes on to state that:

*'It is essential that FRS operate within a framework to reduce UwFS. This can be achieved through the widespread adoption and implementation of this guidance. Co-operation and understanding cannot be expected from companies operating across various regions in the UK when each FRS operates a local policy which details the resource response to AFA systems.'* (Sect. 4 page 6)

Clearly, and in the firmest language possible, CFOA is setting out the expectations that not only do external organisations require stability and certainty to be able to effectively co-operate with this strategy but that in order for that co-operation to be achieved that all F&RS's should adopt and implement the CFOA guidance. That expectation is repeated in the guidance:

*'Widespread implementation will encourage our fire industry partners to work with us in the development and review of the FAMO elements of the guidance. This guidance provides a clear and structured strategy that will, where adopted, lead to sustained reductions in false alarms and UwFS and provides a framework for all FRS, the Fire Industry and Business in which to operate.'*

So, while CFOA set out what they believe should be a uniform approach to AFA actuations, effective unwanted fire signal (UwFS) reduction is not ignored but set out in detail within Section 8 of the guidance which states that:

*'NB: Where FRS employ a nil response to groups of premises types as opposed to targeting of specific system poor performance, they must (FBU emphasis) recognise that it will not be possible to appreciate the full benefits of the holistic approach. FRS that engage with RP's (Responsible Persons) through responding to UwFS will be able to influence these key processes:*

- *The Responsible Person, as defined under the FSO, has overall responsibility for the performance of the AFA system.*
- *Prevention of false alarms.*
- *Prevention of false alarms becoming UwFS.*
- *AFA signal filtering.*
- *FRS response to an UwFS.*
- *Agreed working practices between FRSs and FAMO's*
- *Industry support of the Guidance process.*

*This will be supported by:*

- *The uniform adoption of this Guidance by FRS. (FBU emphasis)*
- *Promoting the use of competent persons in the design, installation, commissioning, management and maintenance of systems. CFOA recommend that FRS support the use of third party certification schemes. Certification through a UKAS (United Kingdom Accreditation Service) accredited third party certification body provides valuable reassurances and assists in the making of informed decisions as to the competency of the service provider.*
- *Promoting the appropriate management of AFA systems by Responsible Persons.*
- *Working in partnership with stakeholders to improve false alarm filtering.*
- *Promoting the adoption of AFA call filtering through FRS control on the 999 system.*
- *Implementing the appropriate FRS response (including pre-determined attendance (PDA) response, AFA response, full emergency response or a follow-up response (community fire safety and/or fire safety regulation response) to resolve UwFS issues).*
- *Monitoring the performance of AFA systems.'*

Clearly your initiative places LFRS outside of the CFOA Guidance.

Furthermore, the key principles of risk assessment, vital to the safe and effective policies and standard operating procedures of all F&RS's, appear not to have been fully considered in relation to a reduction or cessation of attendance by the F&RS. The CFOA Guidance considers this in some detail and advises that:

*'The CFOA guidance for prevention of false alarms and unwanted calls from automatic fire alarm systems offers a number of tools for FRS to use. The tools are represented below in a chronological order. However, it is recognised that each FRS must determine which of the tools they wish to use in accordance with their respective Integrated Risk Management Plans (IRMP) and overall arrangements for managing risk.'*

The FBU are sure you adhere to the guiding principles of risk assessment and that the reduction or cessation of AFA attendance has been fully risk assessed; I would be grateful for a copy of that risk assessment along with the assurance that the assessment has been the subject of normal consultation arrangements for such matters.

CFOA further advise that:

*'C Confirmation of the cause of alarm before calling the Fire and Rescue Service  
A fire alarm system is intended to alert the occupants of a building to the possibility of a fire and to initiate the emergency plan for the building. This will normally, but not always, include evacuation. Dependent on the findings of your fire risk assessment, the fire safety arrangements in a building should include having a system in place to check the area where the alarm has been initiated. This will confirm at an early stage if there is a fire or the cause of the false alarm. This is particularly important given the large number of false alarms which are generated by some AFA systems.'*  
(Section 9(c), Page 11)

To reinforce that point CFOA state that:

*'The arrangements should be included in the fire risk assessment, fire safety policy and emergency plan for the building and will be dependent on the building, its occupancy and use. In addition to using information from the building users, modern technology provides a range of options for confirming the cause of an alarm. The ideal place to prevent false alarms from being transmitted to FRS as UwFS is on site.'* (Section 9(c) Page 11)

Again, it is clear that there is an expectation that a full and specific risk assessment, including an emergency plan, be conducted for each specific building where an AFA attendance is reduced or ceased. We would be grateful if you could both confirm that has occurred for all premises affected and provide us a copy of the respective assessments.

On completion of all the required risk assessments and mindful of the clear language of CFOA as aforementioned the F&RS then has a number of options. CFOA explains them as thus:

*'The FRS has a number of options which it can consider in deciding how AFA calls will be handled. A call challenge or filtering process – Use of this system will allow the FRS to gain additional information about the cause of the alarm, following which a decision is made about what, if any, response is made. Development of such a process will be determined by the specific FRS in line with an assessment of risk in their Integrated Risk Management Plan.*

*Reduced attendance – The FRS may select to send a reduced attendance to any call resulting from an AFA system actuation where there is no confirmation of a fire or signs of fire. In line with adoption of this approach, the 'responsible person' for any site will need to consider what arrangements they will put in place to provide this confirmation (See preceding Section 9C – confirmation of cause).*

*Full attendance – The FRS may select to send a full attendance to any report of an AFA sounding. Whilst this is likely to mean no change to the service's existing control measures, the implications should be considered within the wider context of the service's Integrated Risk Management Plan.'*  
(Section 9(d), Page 12)

Both the FBU and CFOA agree that F&RS's should be careful not to recommend the investigation of an alarm during an emergency call. If investigation was possible it should have already been

carried out as part of the premises existing procedures prior to the emergency call being made. An investigation at this stage may place the investigator in danger.

CFOA helpfully recap the key principles I have referred to above as follows:

*'In order to protect resources, FRS response policies may alter the response to premises where calls are based on unreliable AFA systems. This may include anything from the reconsideration of any 'enhanced response' options through to not sending any attendance in the case of persistent false alarms.'* (Section 10, Page 14)

*... It is recommended that any reduction in response is applied to premises on an individual assessment basis and that suitable notification is provided in advance of any change.*

*... If adjusting FRS standard response attendance to premises the process must be applied (FBU emphasis) in accordance with the guidance in this section and section 11 where applicable.'*

*... Attendance Level Three no emergency response, until a confirmation of fire is received from the premises via the 999 system or from some other acceptable source. Such confirmation will result in a full or enhanced emergency response, dependent on the information received.*

*It is recommended that these response options should only be applied if there is experience of persistent false alarms from specific premises. It should not be the case that it is applied generically e.g. to all premises of a certain type (FBU emphasis). Any changes to the attendance level by the FRS will be communicated in advance to the persons responsible for the protected premises and time will be allowed for them to take appropriate remedial action in accordance with section 11 – Performance.'* (Section 10, Page 14)

*'FRS employing a reduced response option will consider the individual circumstances of the premises management and alarm performance in order to determine the level of response appropriate to the level of UwFS being produced.'* (Section 11, Page 15)

Operational guidance is provided within the document. Hopefully we can work together to achieve the objectives we both seek, that being a reduction in unwanted fire signals.

The guidance further advises that:

#### *'Reducing Attendance*

*In line with local policy where an AFA System crosses the pre-determined trigger that indicates unacceptable performance and UwFS are being received by FRS, those responsible for the system should be instructed to take immediate remedial action.*

*Once performance has become unacceptable in line with local policy, then best practice suggests that the following actions should be considered by FRS.*

#### *The FRS should:*

- *Establish in advance the appropriate level at which changes in response are determined.*
- *Advise the protected premises that they have exceeded the acceptable performance trigger.*

- *Consider whether to revise the attendance level.*
- *Advise the protected premises in advance of any changes and remind them to alert their Insurance Company to any changes to FRS attendance levels.*
- *Continue to review the performance of AFA systems.*
- *Advise that the Fire Risk Assessment/Emergency Plan for the premises must be reviewed.*
- *Consider the use of regulatory enforcement powers.*

*The Responsible Person, together with the maintainer of the AFA, should take the necessary actions to address an unacceptable rate of false alarm activations as outlined in BS5839-1.*

*Once a FRS determines that an unacceptable rate of UwFS has occurred, and a reduced attendance or non-attendance of FRS resources has been instigated, then the FRS will need to determine how long the reduced attendance will last, when it will be reviewed to see if performance has improved, and how normal attendance is reinstated and notified to the protected premises.’ (Page 19)*

Finally and in the same strong language, CFOA remind F&RS’s that:

*‘D.12. CFOA strongly recommends that FRS do not place additional filtering or monitoring burdens on FAMOs complying with this CoP.’ (Page 27)*

Clearly you would have costed this proposal as part of a Cost Benefit Analysis (CBA) and we would be grateful if you could provide the FBU with a copy of that cost benefit analysis along with your explanation as to why the Lancashire Rescue Service appears to be acting contrary to both the CFOA guidance and all the key principles of risk analysis and risk assessment.

The Fire Brigades Union are keen to work with you and the Chief Fire Officer to reduce UwFS’s but view that reduction or cessation of attendances to AFA actuations in the manner adopted by LFRS as to increase risk to community members, property, businesses and firefighters alike.

It can never be the case that premises owners who properly and responsibly manage and maintain their AFAs now find reduced or no attendances to their premises through no fault of their own.

We are sure you will agree that it is a long standing adage within the firefighting community that we never go to a false alarm, we only ever come back from them and it is the case that every fire that occurs in a premise that is protected by an AFA, is alerted to us via that AFA actuation. They are a vital protection against fire and that protection, in the Fire Brigades Union’s view, should never be compromised.

The FBU would also like to raise some specific points from the proposal for change.

The proposal admits that some of the AFA’s were fires, how many of these with this proposal in the future would have a loss of life or property due to none or delayed attendance?

The delay in response is the key likely cause of injury to a fire fighter and the loss of life to the public. Our residents deserve and pay for a response. Those with systems that are continual false alarms are being addressed. A blanket policy fails those public and businesses that have good systems and resolve issues.



The FBU are very concerned that a management policy is more concerned about HMICFRS inspection deterioration from Good to Require Improvement. We are in the business of protecting Lancashire, not pleasing the HMICFRS.

There is no mitigation to lowering our response to any emergencies.

There is also the political and corporate risk that has not been addressed in this policy.

If someone was to die in a fire that had either a delayed attendance or no attendance due to this policy, it would bring the Service and the CFA into serious disrepute and also litigation and legal issues as we have a legal obligation to attend. We have never assumed an AFA is a false alarm and we should never change that view.

### **Summary**

There are significant areas that have not been assessed fully that need to be addressed. It is one thing to identify the risk within Lancashire, and it is another thing to put in a control measure to address it. Consultation is about listening and involving stake holders in finding the solutions. Efficiencies seem to be the key driver to risk. We need to invest to make savings in the long term and this is not been considered in this report.

The FBU are willing to be involved and help the service to find solutions whilst also maintaining an equable service to the public we serve.

We look forward to your response.

Yours Sincerely



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