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Foreword

The Fire Brigades Union (FBU) is the democratic, professional voice of firefighters, control staff and other workers within Lancashire Fire and Rescue

Lancashire Fire and Rescue Service (LFRS) is the statutory fire and rescue service for Lancashire

This Emergency Cover Review represents an opportunity to commence addressing some significant strategic mistakes the Service has made in recent years which has led to unforeseen yet significant budget pressures particularly in relation to the Day Crewing Plus (DCP) duty shift system and the pension benefits due our members which was denied by the LFRS despite the constant and long running advice made by the FBU to the Service.

Service. We represent the majority of operational firefighters within LFRS as well as across the UK.

and is administered by the Lancashire Fire and Rescue Authority.

The FBU welcome the increase of numbers of frontline firefighters, a proposal that the FBU has been urging for more than a decade and is essential to protect the communities of Lancashire the best we can.

The FBU provide this response to consultation yet remind LFRS there are elements within this document which contain proposals that require negotiations with the FBU.



Executive Summary

1. INTRODUCTION

The ECR in the introduction invites the reader to consider a number of other documents and supporting strategies to inform the strategic assessment of risk.

The strategic assessment of risk for 2021-2022 itself contains the statement that the *'Fire and Rescue National Framework identifies challenges that we have to deal with such as the continued threat of terrorism, the impacts of climate change, impacts of an ageing population and **the need to cut the national deficit.**'* (FBU emphasis)

2. EMERGENCY COVER REVIEW

The FBU supports the LFRS stated principles of an emergency cover review which are identified as being:

- *'Ensure we provide an effective and efficient response to fires and other emergencies at all times.*
- *Ensure our crewing arrangements are fit for purpose to meet the risk and incident levels'.*

The ECR continues by stating that LFRS has examined the numbers and types of incidents within Lancashire over the last three years and that determines where LFRS resources should be located, how many LFRS need and how they are staffed. Risk assessment is essential for any fire or

3. EMERGENCY RESPONSE STANDARDS

The ECR correctly advises that each fire and rescue authority sets its own emergency response standards and that LFRS is one of the most challenging in the country.

Critical fire incidents are defined by LFRS as incidents that are likely to involve a significant threat to life, structures or the environment.

The national framework contains no such requirement to cut the national deficit but it does reveal the drive behind documents such as this which seems more about the desire to reduce cost than to properly assess the risks to communities and firefighters alike.

However there is much to welcome from this ECR yet there are some proposals which the FBU oppose, both sides will be laid out in this response document.

emergency cover review, how resources are staffed is not a matter that flows from this review, LFRS has its own well established, long standing safe systems of work (SSOW) that should suitably and efficiently provide for the safest procedures possible with the safest crewing levels possible. That is the essence of risk assessment.

What this ECR has regrettably become, is a budget review placing resources not where they are needed but where they can be afforded and LFRS should be honest about that.

There is little evidence that the ECR has properly assessed the changing community risks within Lancashire whilst maintaining response standards, in fact the FBU will identify where the opposite is the case.

LFRS response standards include call handling and fire engine response time for the first fire engine attending a critical fire, and are identified as follows:

- Very high risk area = 6 minutes
- High risk area = 8 minutes
- Medium risk area = 10 minutes
- Low risk area = 12 minutes



LFRS set their response standard as being achieved if the response time is met by the first appliance on 90% of occasions. Despite this being a standard for the first appliance only, ensuring that lifesaving, safety critical firefighting operations would have to be delayed awaiting the second and subsequent appliances (which have themselves separate and lesser standards), LFRS, like other FRS's plan to fail, by policy, on 10% of occasions. The FBU find this an utterly unacceptable approach for an emergency lifesaving fire and rescue service.

Further analysis of the LFRS risk map indicates (on the 2021 count) that the two risk categories that attract the fastest response standard, very high and high, represent 8.7% of the Lancashire area, the majority of Lancashire resides in the low risk category (55.3%).

The picture for the response standard for the 2nd fire appliance attendance is somewhat different with its own attendance standard of

- Very high risk area = 9 minutes
- High risk area = 11 minutes
- Medium risk area = 13 minutes
- Low risk area = 15 minutes

Again to be achieved on only 85% of occasions. It is logical that if the second appliance is required LFRS should do everything possible for that appliance to arrive on scene the same time, or as close as is possible as the first appliance, the reason why two appliance stations exist as a resource.

This response standard is routinely reported to the LFRA and by extension to the people of Lancashire, the FBU are concerned why the latest performance report to the LFRA has had this important response standard removed and trust it is an oversight by the Service rather than something more sinister.

4. FIT FOR THE FUTURE

LFRS states that it intends to improve emergency response in line with new and emerging risks in Lancashire in the following ways.

- Introduce more resilient and flexible crewing arrangements,
- Optimise emergency cover through dynamic cover software,
- Strengthen response to climate change emergencies,

- Strengthen firefighting and rescue capabilities in high-rise and commercial buildings, and;
- Broaden on-call firefighting capabilities to strengthen operational response.

The FBU fully supports and proposal and/or initiative that would improve emergency response for the people of Lancashire and welcomes the opportunity to comments on the detailed proposals that seeks to achieve that aim.

a. Introduce more resilient and flexible crewing arrangements

Flexible Wholetime

This initiative is purported to have been researched and recommended by a working group of firefighters to replace the DCP and wholetime (2/2/4) duty systems. This is nonsense of course, the group was looking to consider alternatives to the unlawful DCP system, and statements such as this underlines the less than transparent and honourable approaches of some LFRS managers.

The flexible wholetime system (FWT) proposes that firefighters undertake 12 hour day and night shifts to provide 2/2/4 cover in the drive for more resilient and flexible crewing arrangements. This is a stale and disingenuous statement as the recognised, most effective wholetime duty shift system is the 2/2/4 system that allows employers





Initial Submission to LFRS ECR

and management to know for certain where firefighters are as a resource on any given moment in time, where gaps are in resource availability and how to efficiently resolve gaps in the resource availability. LFRS can effectively plan for future staffing abstractions such as training, secondments, pandemics etc.

If the Covid pandemic should have taught the FRS anything it is that staffing is the most important matter for a FRS, ensuring appropriate fire cover for the communities we serve. The 2/2/4 system provides the most effective system for an employer for planning purposes. Whether the firefighter works a 12 hours shift or a variation that the firefighter is content with is completely irrelevant to the real issue of ensuring the firefighter is available and on a fire appliance when he/she is expected to be there.

What the FBU urge LFRS to focus on is the welfare and wishes of its workforce to maintaining the maximum levels of morale which ensures the highest levels of attendance.

The FBU notes the proposal to change our members working terms and conditions in relation to the shift system and welcomes the required negotiations that flow from this proposal but does wish to put the Lancashire Fire and Rescue Authority that our members are minded not to

Introduce Flexible Day Crewing at St Annes

It is important to note that the ECR claims to ensure the effective and efficient response of LFRS crews and that the crewing levels are fit for purpose to meet the risk and incident levels our communities face.

This proposal identifies in some form of defence that 64% of incidents occur between 08:00 hrs and 20:00 hrs, revealing that the communities of St Annes, which has a higher predominance of older community members, suffer 36% of incidents when the protection of immediate, wholetime fire cover has been removed them.

It is the case, as every professional firefighter will remind the reader, which fires in the evening or



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agree to change to their working conditions at this time, changes that provide no further flexibility or efficiency savings to the Authority whatsoever.

To reinforce the misgivings the FBU have on the detail of this proposal is the statement that DCP will remain at five stations but LFRS will reduce the crewing levels at those 5 locations from 14 to 13. The reduction of the crewing levels at the DCP stations are not supported by any evidence whatsoever and is declared as being a proposal that simply *'reduces the cost of the duty system'*.

The FBU does however, welcome the reduction of the DCP system within LFRS. The FBU has long sought determinative dialogue with LFRS that would secure a proper, systematic and meaningful withdrawal of DCP and repeats that proposal within this document.

The FBU recognises that LFRS needs time to be able to implement strategies that resolves the concerns of the FBU and our members in a measured and methodical manner, however the FBU is deeply concerned at the levels of competence and ability of some managers involved in nuanced dialogue, leading to missed opportunities and the FBU urge the Authority to seek the assistance of the NJC Joint Secretaries to progress this matter to the satisfaction of both the employer and the Union.

night-time, tend to be more serious incidents, leading to more fatalities. There are a number of reasons for this such as lack of passing footfall to any incident that could lead to community members noticing the fire and alerting the FRS, smoke alarms being heard by community members and similarly alerting the FRS, or the resident being awake and being able to rescue themselves. Naturally, in the evening, people tend to be resting or asleep and so will be less aware of fires in the home.

The most important admission by LFRS is that this proposal leads to what is identified by the Authority as an increase on response times of 2 minutes and 47 seconds. This is not an *'effective*





or efficient response to fires' the ECR strives to achieve and significantly negatively impacts on the communities of St Annes.

Introduce Flexible Day Crewing at Penwortham

The FBU repeat our comments as above.

b. Optimise emergency cover through dynamic cover software

The FBU support this initiative.

c. Strengthen our response to climate change emergencies

In relation to the proposed investment in fire appliances with off road capabilities in areas at risk of wildfires and flooding, this is something the FBU can provisionally support but need further information as the emerging workload that such incidents presents FRS's is onerous and resource intensive leading to obvious terms and conditions issues for the FBU. Such issues

however are, in the view of the FBU, easily and necessarily resolvable.

In relation to 'specialist' flood water incident work, the FBU view this as not within the role of a firefighter but do welcome further dialogue with the Authority on this issue to achieve the stated aims of the Authority.

d. Strengthen firefighting and rescue capabilities in high-rise and commercial buildings

The FBU provisionally support this proposal but look forward to further detail to make a more informed response.

e. Broaden on-call firefighting capabilities to strengthen operational response.

The FBU and our National Retained Committee (NRC) completely support the provision of retained/on call firefighting provision within LFRS but it is the case that the availability of retained firefighters currently is extremely compromised for reasons exceeding the remit of this ECR.

What is obvious however, is the controversial operational decision by LFRS to mobilise on-call firefighting appliances with 3 firefighters, stands in direct opposition to the Authorities stated principle of providing an effective and efficient response to fires. It is dangerous and imperils both the firefighters and our community members.

