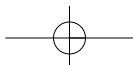
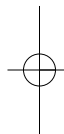
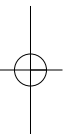
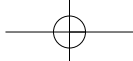


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Introduction

What is a cynic? A man who knows the price of everything and the value of nothing.
Oscar Wilde

Our service is facing difficult times. The financial crisis which unfolded from 2008, has created huge uncertainty about the future of the UK (and the world) economy. We are told that there is a huge gap in the public finances and that this must be filled by tax increases and major cuts in public spending. This mantra has been repeated so often that it appears to be the only option.



Regrettably, many politicians within our service seem to agree (however reluctantly) with the cuts agenda which is now developing. All too many Chief Fire Officers are simply asking how deep the cuts need to be.

To add to this the Audit Commission have unleashed their 'report' on the fire and rescue service. To the Audit Commission it is all very easy. You can churn out a few simple statistics and 'prove' that cuts can be made across the board, regardless of local circumstances and regardless of what has gone before.

The truth is that the Audit Commission has not thoroughly examined our service. It has completely ignored the professional concerns of firefighters about the quantity and quality of operational training being delivered or about the number of fatalities at operational incidents. They completely ignore the need for fire services to assess risk and then to plan for how it will deal with the operational incidents which will and do happen. The quality of the service provided is completely ignored.

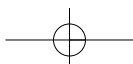
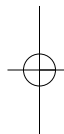
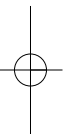
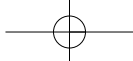
Our report highlights these contradictions. I hope that others within the service will join with the FBU in challenging the simplistic 'bean counter' approach to running a fire and rescue service. The truth is that if this agenda is not challenged we face a very uncertain future.

There are two key things missing from the Audit Commission report: firstly any attempt to take on board the views of professional firefighters; and secondly any attempt to identify what the public want from their fire and rescue service.

The market-based approach which the Audit Commission advocate has been tried elsewhere in our public services. Is the result greater public confidence and trust? Not in the slightest. Our service enjoys very high levels of confidence and trust. The agenda set by the Audit Commission poses a very serious threat – a threat to the very reputation of firefighters and the fire and rescue service. At the heart of our profession is a commitment to public service – that is something which is totally absent from the Audit Commission thinking and why they represent a very serious and very cynical attack on our service and our profession.

A handwritten signature in black ink that reads "M. Wrack". The signature is written in a cursive, slightly slanted style.

Matt Wrack
General Secretary



Executive summary

The Audit Commission describes itself as 'an independent watchdog, driving economy, efficiency and effectiveness in local public services to deliver better outcomes for everyone'. This is not apparent in *Rising to the challenge*, its report into the fire and rescue service (FRS) in England. The FBU has studied this report at length and believes its recommendations to achieve 'economy' would drive down effectiveness.

The report displays a regrettable lack of understanding of the FRS, especially within operational delivery, and the full range of services that it delivers to communities. Instead the report cherry picks from a range of statistics, services and practices, and previous documents and reports in an attempt to justify cuts.

It is apparent to the FBU that the sole purpose of this report is to achieve savings through cuts in front-line service delivery. The result that such cuts would have on the effectiveness of the FRS has been at best misunderstood, or at worst misrepresented in an attempt to justify savings.

It is the view of the FBU that *Rising to the challenge* shows that the Audit Commission does not have the knowledge or experience to inspect the operational fire and rescue service. Because it does not understand that the service is organised on the basis of risk assessment it fails to appreciate the dire consequences its proposals would have on both public protection and firefighter safety.

The FBU believes that in future, professionals who do understand the service should undertake the task rather than the Audit Commission or, failing that, the commission should work in tandem with the Health and Safety Executive to ensure that safety rather than short-sighted cost cutting remains the priority.

Fire and rescue services need to work smarter

The report makes much of fire service business planning. Scattered throughout the report are references such as:

Para 167: *[Fire and rescue services] need to establish what their objectives in playing a broader community role should be and evaluate their activities against them.*

Para 113: *Three fire services we visited were involved in over 200 partnership initiatives... But none had systematically identified the costs and benefits of their involvement to determine when resources should be prioritised.*

The report consistently fails to put the two issues of funding and business planning together. It does not recognise that in times of financial constraint, the fire and rescue service must work smarter. The Audit Commission either does not understand, or ignores, the process of Integrated Risk Management Planning (IRMP), only mentioning this fundamental principle of the modern fire and rescue service on three occasions. But in truth, through good IRMP, fire and rescue services should systematically identify the costs and benefits of all of their activities. They should identify what resources are required for everything that they propose to do; and they should prioritise every aspect of their business from health and safety and staff morale to partnership projects and emergency intervention.

Because the Audit Commission has shown little understanding of IRMP or the intricacies of fire and rescue service work generally, its analysis is not rooted in the real day-to-day experience of firefighters. There appears to have been little or no empirical research at a practical level. The commission displays only a superficial knowledge of fire and rescue service activity. As a result, the report's only suggestion for making savings in the fire and rescue service is to cut front-line services.

Rural areas can't be compared directly with urban areas

There is no scope for even small-scale changes in many fire and rescue services that protect rural parts of the country. In urban areas cuts in front-line service provision have produced savings, by putting people and property at greater risk, but other appliances can 'fill the gaps' and keep that increased risk below the radar of public concern.

In rural areas, where the distance between fire stations can often be 15 or 20 miles, gaps in appliance availability cannot be filled and even small cuts in front-line service provision would soon materialise as major property and life loss.

Night time and daytime cover

Nationally, the number of primary fires peaks at 6 pm. There are fewer fires during the morning and later in the evening, and fewer still at night. The Audit Commission therefore concludes that fewer firefighters

and fewer appliances are needed towards the morning and the evening, and fewer still at night. This is the conclusion that a statistician would draw from the data.

However, even though there may be fewer fires at night, it is impossible to say exactly where they will break out, so it is impossible to reduce the number fire appliances at night without increasing the risk to the community.

It is also the case that fires that break out at night, unlike those that break out during the day, are often not noticed until they are of a considerable size. Night time fires are therefore frequently larger and more life threatening than day time fires.

The Audit Commission has not grasped the fact that it is an operational necessity to provide a level of fire cover at night that is, in comparison to the number of fires, out of proportion to the level of fire cover that is provided during the day.

You can't evaluate the running of the FRS the way you would a business

Paragraph 46 reveals the motivation of the report:

To ensure they meet new efficiency targets, fire services will need to consider further whether they have the right number of stations and appliances, and the right crewing arrangements.

But when the Audit Commission talks about things being 'right', it is not talking about a fire and rescue service that delivers an effective public emergency service. Rather, it is talking about one that delivers cash savings.

Comparison with Post Office

For several years, the Post Office has been in the process of 'rationalising' its outlets. The cost of running them is weighed against their productivity, and if they are not financially viable, they are earmarked for closure. On almost every occasion, the post offices that fail to meet the cost versus productivity criteria are in rural locations, and the counter argument to closure is that post offices are not just 'units of productivity' in rural areas. They are a public service. And as a public service, they should be maintained even if they aren't profitable.

It may seem an embarrassingly obvious point to make, but given the thrust of the Audit Commission report it does need to be made: the fire and rescue service is a public service. There should be no question about 'profitability' being a criterion for provision.

To suggest, as the Audit Commission does, that fire and rescue service provision should take account of 'cost per incident' is to move away from the very ethos of public service. Any suggestion that cost could come before effectiveness would, in the context of the fire and rescue service, be irresponsible.

Comparison with NHS

It is true that the National Health Service makes 'cost benefit' decisions about the provision of new drugs, but these decisions are made by the National Institute for Health and Clinical Excellence (NICE). NICE comprises a number of independent advisory groups made up of health professionals, those working in the NHS, patients, their carers and the public. The Audit Commission does not have a similar authority, nor the necessary knowledge, to make such decisions within the fire and rescue.

Use of TRVs

The Audit Commission extols the virtues of using targeted response vehicles (TRVs). TRVs are small fire appliances with a crew of 2 or 3 firefighters who attend 'small fires'. The idea being that using small fire engines with small crews saves money.

Today, a number of FRSs have decided to purchase TRVs and to put them on the run. But these FRSs have not set outcome based performance targets for these vehicles so that their effectiveness can be measured, and it is clear that their operational deployment is rarely thought through.

Once they are purchased, TRVs are therefore being sent to inappropriate incidents to justify their existence or being used as additional appliances at additional cost.

So the Audit Commission's ignorance of operational fire and rescue service deployment has encouraged FRSs to spend additional money on resources that do not deliver either community safety or financial savings.

Audit Commission praising Manchester on retail model

Case study 3 of *Rising to the challenge* describes Greater Manchester Fire and Rescue Service (GMCFRS). The first paragraph says that in developing a 'flexible' duty system, GMCFRS 'identified best practice in the private retail sector'.

The private retail sector is notorious for poor wages and high staff turnover. The fire and rescue service is a labour-intensive service industry where quality can only be delivered by committed, motivated staff.

Since GMFRS is a public emergency service, would it not have been more appropriate to look for inspiration from best practice in the public emergency service sector?

Hertfordshire – Audit commission's view compared to HSE's findings

Two Hertfordshire firefighters died at a fire at Harrow Court flats in February 2005.

In July 2005, the Audit Commission carried out a Comprehensive Performance Assessment (CPA) of Hertfordshire Fire and Rescue Service (HFRS). The subsequent report described HFRS as 'fair'.

In 2006, Hertfordshire Fire and Rescue Service (HFRS) underwent an Operational Assessment of Service Delivery (OASD) which was critical of some aspects of hot fire training, but still described HFRS as 'performing well' ("consistently above minimum requirements") in the area of operational preparedness.

The Audit Commission continued to inspect HFRS in 2006, 2007 and 2008. During those years, its assessment of HFRS's 'direction of travel' was 'improving well', 'improving adequately' and 'improving well' respectively.

However, on 21 April 2009, Hertfordshire Fire Authority was issued with an improvement notice by the Health and Safety Executive (HSE) stating:

...refresher training on aspects of Breathing Apparatus (BA) use has not been delivered to Firefighters by a BA Instructor within the last two year period and is not currently planned to be delivered in the near future, including BA emergency procedures and BA entry control procedure, which were identified as issues in the Harrow Court investigation.

This case highlights that the current audit and inspection regime of fire and rescue services is meaningless when held up against the outcome of a truly independent and professional inspection as carried out by the HSE.

In *Rising to the challenge*, the Audit Commission bases its assumptions about the capacity of the FRS to 'safely' absorb financial cuts on its own assessments of FRS performance.

But the example of Hertfordshire shows that the Audit Commission is not competent to assess the performance of fire and rescue services. The outcomes of their assessments of performance are fundamentally flawed and do not stand up to scrutiny.

Accuracy

While it may be of little surprise that the Audit Commission has a poor grasp of the operational running of a fire and rescue service, it might be expected that they would be able to accurately transpose numerical data from reference material into their own reports.

However, the Audit Commission misquotes 'national surveys' and claims that smoke alarm ownership has risen from less than 25% to over 80% since 1998. In fact, the reference quoted by the Audit Commission (Table 2.3 of *Fire Statistics, United Kingdom 2006*) says that smoke alarm ownership rose from less than 25% to over 80% since **1989** not since **1998**.

Also, in their **Case study 1**, the Audit Commission produces a table of annual CO₂ emissions for standard fire appliances and TRVs. They state that a major fire appliance produces 180,000 tonnes of CO₂ per year.

In fact, if you burn a litre of diesel you will produce around 2.62 kgs of CO₂ and a standard appliance uses in the region of five litres of diesel to travel eight miles. So to produce 180,000 tonnes of CO₂ per year, a standard appliance would have to travel at 16.5 times the speed of sound for 24 hours a day, every day of the year!

Firefighters' wages have just kept pace with average wage inflation

The Audit Commission report makes much of the current financial situation brought on by bankers

seeking short-term gain and personal benefit while working within an inadequately regulated industry. Clearly the current situation must be recognised but by using this context as a driver for radical and dangerous change the Audit Commission has joined an increasing number of organisations who stand accused of exploiting this situation to implement previously discredited ideas.

Although the report dwells on the current financial situation, it makes light of the historic financial position of the fire and rescue service. In describing increases in funding over the last 10 years, the report gives the impression that generous settlements have been delivered but that staff wages have absorbed much of this 'generosity':

Para 24: *Between 2003/04 and 2007/08, net expenditure increased by 16 per cent (5 per cent in real terms). Most of this additional expenditure has funded the 16 per cent pay increase that firefighters received as part of the modernisation programme.*

However, the pay of all uniformed staff increased as part of the 'modernisation programme', not just firefighters', and the report fails to point out that the 16% pay increase that firefighters received was quite modest. It only just ensured that firefighter's wages kept pace with average wage inflation over the last 10 years.

The efficiency challenge

Under the heading of 'the efficiency challenge', the report describes the cuts that have been made over recent years to front-line wholetime firefighter posts and the increases that have been made to non-firefighter posts.

Para 35: *the number of wholetime firefighters fell by 5 per cent, from 32,300 in 1997 to 30,600 in 2008.*

Para 37: *'In 2008 there were around 9,300 non-firefighting members of staff, up 35 per cent from 2000.*

In other words, over a period of 11 years leading up to 2008, 1,700 firefighter posts were lost, and within the eight years leading up to 2008 2,411 non-firefighter posts were created.

The 9,300 non-firefighting staff now make up a nearly a quarter (22.4%) of the full-time workforce of around 41,500. (There are about 30,600 firefighters and 1,600 control room staff.) After auditing fire and rescue

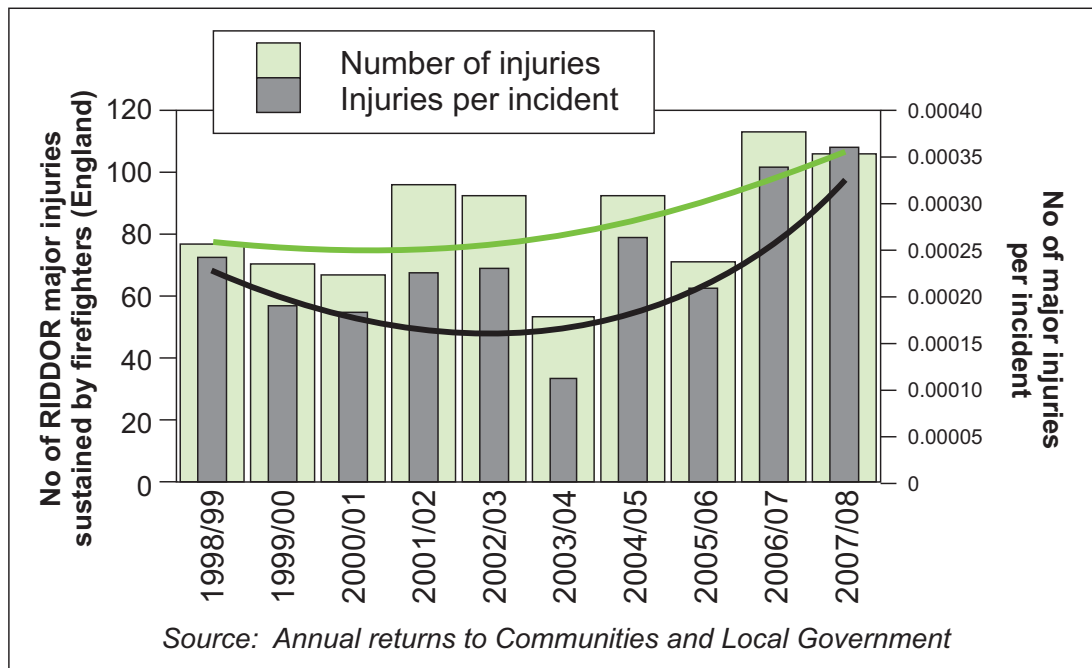
services since 2005, the Audit Commission still finds it 'not possible' to say what is being done by the 9,300 non-operational employees, yet its only solution for reducing costs in the fire service is to make further cuts in firefighting posts.

Paragraph 57 of the report says: 'There is no evidence that making savings has adversely affected safety.' To support this assertion, the report groups fire and rescue services into four quartiles according to the amount of efficiency savings that they have made, and then compares the number of firefighter injuries in 2004/05 with the number of firefighter injuries in 2006/07 for each quartile.

This is an unrealistically short period of time over which to measure an effect. It ignores the fact that it is the largest fire and rescue services that have made the most savings, and it is the largest fire and rescue services that have seen the greatest decreases in primary fires.

The number of firefighter injuries is a very important measure of safety in the service. As important, however, is the probability of being injured at an incident. With falling numbers of incidents, it is inevitable that the number injuries will fall as well, but this hides the fact that the probability of firefighters being injured at incidents appears to be increasing:

The picture may not be clear, but there most certainly is evidence that making savings has at the very least coincided with a fall in firefighter safety. The point is that the Audit Commission has not made a serious attempt to find out whether or not one has caused the other.



Review of the Audit Commission report

Rising to the challenge

This review is a detailed section by section commentary on the Audit Commission report. Chapter and section headings and numbers are the same as those in the original report.

Recommendations

Fire and rescue authorities should:

According to the Audit Commission report, fire and rescue authorities should:

- challenge themselves and their chief fire officers (CFOs) to improve efficiency as well as performance;
- lead their communities by taking hard decisions affecting staffing levels and deployment in the interests of efficiency;
- ensure that they have the right information to justify those decisions;
- defend decisions publicly once they have been made;
- challenge their CFOs to improve the diversity of their workforce;
- define their objectives for regional management boards (RMBs), and participate beyond where required to in RMBs only where there is a good business case for doing so; and
- provide leadership on equality and diversity issues, supporting and encouraging effective culture change within the fire service.

The FBU says in its IRMP Framework document:

... it is essential that members of the fire and rescue authority imagine themselves to be non executive directors of a private company... Non-executive directors are the custodians of the governance process. They are not involved in the day-to-day running of business but monitor the executive activity and contribute to the development of strategy.

The Audit Commission's recommendations that FRAs should challenge CFOs and provide direction on standards of conduct confirm the position of the FBU. However, unlike the FBU, the Audit Commission fails to recognise the underlying political role of a fire and rescue authority (FRA). The Audit Commission's recommendations for FRAs are therefore biased and unhelpful.

It is certainly true that the FRA has a responsibility (on behalf of the public who elect them) to ensure that their FRS provides value for money. But FRAs also have a responsibility (on behalf of the public who elect them) to ensure that their FRS provides the type and level of fire and rescue service that the community demands.

The second recommendation of the Audit Commission is that FRAs should 'lead their communities', but the role of a councillor on a fire authority is as much (if not more) to provide an effective fire and rescue service which meets the expectations of their community.

The ability of elected members of FRAs to carry out their role of public representation is being eroded rapidly as FRSs become more independent of central government guidance and control. That is why direct public consultation is so important. But members of FRAs should not be forced further down this road by the Audit Commission.

Also, while there are many members of FRAs who are capable of challenging their CFOs and providing direction on standards of conduct, there are many more who are not.

The Fire Brigades Union says:

Fire and rescue authorities should:

- be fully conversant with the process of Integrated Risk Management Planning;
- constructively challenge and contribute to the development of FRS strategy;
- scrutinise the performance of management in meeting agreed goals and objectives;
- provide independent views on resources, appointments and standards of conduct (including equality and diversity);
- represent their communities by listening to their concerns both directly and through the results of consultation exercises carried out by their FRS;
- make the views of the local FBU an integral part of strategy, planning and decision making;
- refuse to endorse proposals for change unless they are supported by robust evidence at the time they are made;

- fully understand the evidence that purports to support change;
- satisfy themselves that the proposal has undergone appropriate consultation with informed stakeholders;
- listen to any contrary evidence that may be offered by external or internal stakeholders;
- opt out of the wasteful regional FiReControl project.
- systematically explore the available options for working with neighbouring fire services and pursue those that deliver the biggest efficiency savings;
- improve strategic planning and performance management of partnership working;
- improve the ability of managers at all levels to manage change; and
- provide leadership on equality and diversity issues, taking a lead in challenging behaviour that does not promote equality and diversity.

In all decision making, it is the role of the FRA to balance:

- the wishes and needs of the public and other external stakeholders;
- external pressures (including finance) on their FRS;
- the views of their staff as represented by the FBU and other affiliated trades unions;
- the views of their CFO.

The ultimate decision-making body for the fire and rescue service today is the fire and rescue authority.

Legal and moral responsibility for the performance of the fire and rescue service does not rest with accountants, finance managers or external auditors but with the fire and rescue authority. The fire and rescue authority must not make 'hard decisions' simply 'in the interests of efficiency'.

Chief fire officers should:

According to the Audit Commission report, CFOs should:

- aim to meet or beat government savings targets by improving operational efficiency;
- continue to use those savings to invest in community fire safety (CFS);
- identify the benefits of initiatives for the wider community and invest in them in proportion to their value;
- adopt good ideas for improving efficiency from other fire services, or adapt them to their own circumstances;

As part of the so-called 'modernisation' agenda introduced into the fire and rescue service after the Bain report of 2002, FRSs were told that they were to be given a significant amount of autonomy. This autonomy has been encouraged by the central government departments who have had responsibility for the fire and rescue service in the intervening years. To underline the autonomy of FRSs, the Department for Communities and Local Government (CLG) has steadfastly refused to allow the word 'must' to appear in any of its communication with FRSs, except occasionally in the English National Framework document.

The objective was always claimed to be a public service provided by local councils more focused on the needs of local people.

In practice, by removing previous national standards of fire cover, by failing to set new 'baseline' national standards which a fire authority could not fall below within the IRMP process and by starving FRSs of necessary finance, the government has shown that the autonomy given to FRSs was false.

By removing national standards and cutting finance the government has led FRSs down a path of using their 'autonomy' to cut front-line services. Unfortunately, a number of FRSs have willingly followed. This has resulted in the English fire and rescue service becoming a fragmented post code lottery because:

- there is insufficient collaboration between services; operating procedures are not 'joined up';
- standards of training vary widely from one part of the country to another;
- good practice is not shared and bad practice is not remedied;

- other than the Fire Brigades Union, there is no authoritative body that speaks with one voice on behalf of the English fire and rescue service.

In other words, the 'modernisation' agenda that has been pushed forward since 2002 has driven down the effectiveness of the FRS.

The Audit Commission report talks about how chief fire officers should 'adopt good ideas for improving efficiency from other fire services'. But with so few services monitoring or measuring the effects of their 'good ideas' except in financial terms, in the current climate of individualism the Audit Commission is in danger of encouraging a competition between chief fire officers to see who can cut their budget the deepest.

This consequence would be very unhelpful for the English fire and rescue service.

The Fire Brigades Union says:

Chief Fire Officers should:

- always put the effectiveness of the fire and rescue service first;
- be fully conversant with the process of Integrated Risk Management Planning;
- aim to meet government savings targets if they can do so without increasing risk to the public or firefighter safety – including the individual risk of those immediate danger as well as the average risk of the whole community;
- look for cost savings that do not impact on 'core business' – front-line services are the easy target for those who seek to reduce the cost of the fire service but who have little or no appreciation of the issues involved;
- take genuine steps to assess the impact that changes to staffing arrangements will have on work/life balance, family friendly policies and equality;
- properly implement the process of IRMP through better strategic planning and genuine performance management;
- recognise that by allowing their services to drift apart into competing islands of individuality, they

weaken the ability of the service as a whole to protect itself against attacks on the service as a whole;

- create forums where good practice can be shared and failures can be learned from;
- explore options for working together and do so where it leads to greater efficiency and effectiveness;
- stand against efforts to force collaboration where it does not lead to greater efficiency and effectiveness;
- adopt an agenda of 'improvement management' and abandon the imprecise agendas of 'change management' and 'modernisation' that have so damaged the fire and rescue service over recent years;
- provide leadership on all issues by setting an example;
- opt out of the wasteful regional FiReControl project.

Central government should:

According to the Audit Commission report, central government should:

- actively publicise those fire services delivering all elements of modernisation, including efficiency, and encourage those with the furthest to travel;
- implement agreed proposals for developing operational guidance with the chief fire and rescue adviser (CFRA) and other stakeholders;
- review the role of RMBs and their place in the improvement infrastructure; then define and communicate its expectations of them and their potential value to FRAs;
- advocate the role the fire service can play in achieving broader community outcomes to other public services;
- publish data on efficiency savings by fire services; and
- provide leadership and guidance on equality and diversity issues and the development of an organisational culture that embraces equality and diversity.

The environment in which fire and rescue services operate is increasingly complicated. This is highlighted by Figure 31 on page 64 of the Audit Commission report that shows the many stakeholders involved in the governance and delivery arrangements for fire services (see Figure 19 on page 47 of this review).

The standards and objectives that fire and rescue services have to meet are increasingly diverse and are assessed by an ever-widening range of bodies. The Audit Commission is to assess the 'outcomes for people in an area', while feeding into this is the Operational Assessment of Service Delivery carried out by voluntary self assessment and peer review. The key strategic business planning document of an FRS, the IRMP, is supposed to be scrutinised by fire authority members. The Health and Safety Executive (HSE) is to inspect the health, safety and welfare aspects of a number of services, and by implication, the service as a whole.

At the same time, FRSs are expected to take on new roles, improve performance and manage change – all with fewer resources.

Organisations need to be pulled together under supportive common direction and leadership. The CLG should be fulfilling this role, but it is not doing so.

The Fire Brigades Union says:

Central government should:

- Implement a 'baseline' national standard of fire cover which an FRS cannot fall below when setting an IRMP;
- not compare FRAs against one another on the over-simplistic measure of cost, and certainly not publish data on efficiency savings that would be little more than league tables of cuts;
- provide understandable and relevant comparisons between services for the public to judge their service by (the ambulance service eight-minute response on 75% of occasions is an example where this is done successfully in other emergency services);
- positively help FRAs by streamlining the governance arrangements that are standing in the way of true efficiencies;
- review the role, purpose and place of RMBs;

- release FRAs from the requirement to follow the national procurement strategy;
- ensure that the fire and rescue service plays its part in delivering broader community outcomes where to do so does not impinge on the unique core activities of the service or the safety of employees;
- produce an English National IRMP to provide performance managed direction to collaborative working, common threats and national risks;
- re-energise key national bodies by giving them greater authority to provide leadership, guidance and instruction to the fire and rescue service;
- appoint or create a new external body that is both focussed and efficient to employ knowledgeable and competent people to audit operational and service delivery aspects of the fire and rescue service;
- scrap the wasteful regional FiReControl project.

The Audit Commission will:

According to the its report, the Audit Commission will:

- continue to challenge fire services to deliver value for money as part of the new use of resources assessment;
- ensure that Comprehensive Area Assessment (CAA) assesses fire services' performance across their expanding portfolio of activities; and
- provide a tool to allow fire services to use the data in this report to benchmark their own performance.

Under the new Comprehensive Area Assessment scheme, the Audit Commission is to audit 'outcomes for people in an area and a forward look at prospects for sustainable improvement'.

When looked at in terms of cold statistics and cost, the core business of the fire and rescue service may seem to play only a very small part in the lives of people in an area. However, the FBU and every person who has had to call on the FRS know that people in an area are often not influenced by cold statistics and cost. They feel safe knowing that they have a fire appliance and

crew in their midst in the event that they need them.

The Audit Commission has not taken account of public satisfaction and this vital 'feeling of safety' that the FRS provides them.

In *Rising to the challenge* the Audit Commission completely fails to grasp the role that IRMP must play in FRA strategic planning. It shows that it does not understand integrated risk based fire cover by implying that fire cover standards should be based on the number of incidents attended in a geographical area. It makes the frankly naive suggestion that cuts made in metropolitan services can be replicated in rural brigades – just on a smaller scale.

In **paragraph 38** of the report, the Audit Commission makes the astonishing admission that (even though it has been auditing FRSs since 2005):

It is not possible to determine what proportion of non-firefighting staff in the fire service are delivering community safety work.

Non-firefighting staff make up a quarter of the workforce of FRSs and yet the Audit Commission does not know exactly what their role is. Instead of trying to find this out and then making an analysis, the Audit Commission instead concludes its report by saying that its first option for making 'efficiency savings' is to further reduce the number of wholtime firefighters required to cover shifts.

On page 68, the Audit Commission cites the Tri-Services control in Gloucestershire as being a model of good practice. This is an important statement which should direct other FRSs to explore this facility as a potential option. However the Audit Commission does not mention that the delayed, over-budget and operationally dangerous regional control project will force the Tri-Services control in Gloucestershire to cease to operate.

All of the above points reflect the lack of grasp that the Audit Commission has on the issues currently facing the English fire and rescue service

The Fire Brigades Union says:

The Audit Commission should:

- audit 'back office services' to ensure that public money is properly accounted for in the fire and rescue service;

- not audit or comment on operational or other service delivery aspects of the fire and rescue service unless they fully understand them;
- encourage CLG to scrap the wasteful regional FiReControl project.

The Fire Brigades Union will:

- continue to represent our members effectively, efficiently and economically;
- continue to challenge those who put lives and property at risk by cutting front-line intervention services and fire safety enforcement while failing to robustly challenge other areas of cost in the fire and rescue service;
- work with stakeholders to encourage change in the fire and rescue service that leads to risk assessed, measured improvement while standing firm against change that simply leads to 'change';
- work with stakeholders to encourage greater knowledge of, and proper use of, the integrated risk management process.

1 Introduction

The format of this FBU document follows the format of the Audit Commission document being reviewed.

Section 1 of the Audit Commission document comprises a very brief summary of the fire and rescue service (FRS) today in terms of its size and its activity, and a short review of the changes in FRS activity since the turn of the century.

The introduction also mentions some of the key documents that have influenced the shape of today's FRS including the 1995 Audit Commission national study *In the Line of Fire* and the 2002 Bain Review.

Paragraph 5

Paragraph 5 refers back to the 1995 Audit Commission national study *In the Line of Fire*. It describes some of the areas the Audit Commission identified where the fire service could improve efficiency and effectiveness.

Interestingly, though not surprisingly, Paragraph 5 is somewhat selective in its quotes from *In the Line of Fire*. It does not mention in full the contents of Chapter 5 of *In the Line of Fire*, entitled 'An Agenda for Change'. Part of that chapter said that the Home Office (responsible for the fire service at the time) 'should launch a research programme into fire risk and possible response strategies, so that a future framework of national fire cover standards can be formulated based on empirical evidence'.

Also ignored in Paragraph 5 is what the Audit Commission had to say about appliance crewing in 1995.

It was the case under the old national standards of fire cover that the first appliance to arrive at a fire should have a crew of five on at least 75% of occasions, meaning that on up to 25% of occasions the crew could be only four. In Paragraph 38 of *In the Line of Fire* the logic of this was questioned: '*particularly given the problems of dealing with property fires with fewer than a crew of five*'.

And when discussing a 'research-based approach to fire cover', *In the Line of Fire* said that the 75% rule should be reviewed and a less arbitrary guideline should be determined.

The point is that in the Introduction the Audit Commission paints a picture of considered planned change over 15 years, starting with their own 1995

report, running through Bain, and leading into a so-called 'modernisation programme'.

Whereas in fact, the Audit Commission has completely changed its mind about some of the things it proposed in 1995, Bain's scrapping of the Central Fire Brigades' Advisory Council halted production of fire service operational guidance (a problem that is only just being addressed) and the so called 'modernisation programme' was never a programme. It is just a list of things that happened in the same decade.

However, insomuch as the introduction is selective where necessary and rose tinted where needs be, it sets the stage well for the Audit Commission's approach in the remainder of the document.

2 The cost of the fire service

Paragraph 20

Paragraph 20 of the Audit Commission report states that overall expenditure on the fire service has risen from £1.3bn to £2.1bn between 1997/98 and 2007/08. A gross rise of 61%, this is described as a 25% rise in real terms. A 25% increase on top of £1.3bn actually brings the figure up to £1.625bn, which means that inflation over the 10-year period has soaked up £0.475bn of the additional expenditure (or 29%).

Paragraph 20 also states that this 25% real-terms increase is 'in line with' the real-terms rise in expenditure on the police service of 28%. If the fire service had received a real-terms increase in expenditure of 28%, the initial £1.3bn would have increased to £1.664bn. Inflation of 29% would have increased this to 2.15bn.

This means that the expenditure on the two services – described as 'in line' with each other – is actually different by £50m per year by 2007/08.

It is true that this only represents 2.3% of total expenditure in 2007/08, but when added to the 9% annually recurring, so-called 'cashable' efficiency savings already made and the further 5% expected to be made by 2011 on top of potential real-terms reductions in funding, it is clear that unless properly funded, the fire and rescue service is heading for a crisis.

Paragraph 24

Paragraph 24 makes the point that between 2003/04 and 2007/08 net expenditure on the fire and rescue service increased by 16%, but that most of this increase has funded the 16% pay increase received by 'firefighters' over that period 'as part of the modernisation programme'.

The pay of all uniformed fire and rescue service staff up to and including area managers has increased by 49% since 1989 – not just firefighters' pay. This is almost identical to the increase in the average national wage which, according to the Office for National Statistics, increased by about 50% between 1997/98 and 2007/08.

The fire and rescue service is a labour-intensive industry with about 80% of its expenditure being pay. There is no reason why fire and rescue service employees' pay should not keep pace with the national average, and it is therefore inevitable that the majority of a 16% increase in expenditure should fund pay.

3 The efficiency challenge

(See Appendix A for a commentary on 'efficiency')

Paragraph 31

Paragraph 31 starts off by summarising Chapter 2 (The cost of the fire service) in one sentence, saying that 'fire services have received a significant amount of additional funding over the last decade'. It goes on to say that this has enabled them to take on new roles and responsibilities.

In fact, as highlighted by Paragraphs 20 and 24, the funding of the fire and rescue service would currently be 2.3% higher if it had actually kept pace with police funding over the last 10 years, and much of the increase in funding that the fire and rescue service has received has been used to enable employees' pay to keep pace with the national average.

Paragraph 31 would therefore better state the case if it said: 'Despite funding increases over the last 10 years that have only just kept pace with wage inflation, fire and rescue services have still taken on new roles and responsibilities.'

Paragraph 32

In Paragraph 32 the report asserts that 'there remains significant scope to improve economy and efficiency in the fire service without increasing risk to the public or firefighters'.

However, there is clear evidence that the changes recently imposed on fire and rescue services may have already increased risk to firefighters, and there is every reason to suppose that further 'economy and efficiency' will in fact increase that risk further.

Amongst all the graphs in the report, the frequency of reportable injuries to firefighters and the number of firefighter fatalities at incidents are notable by their absence. Those omissions are corrected here:

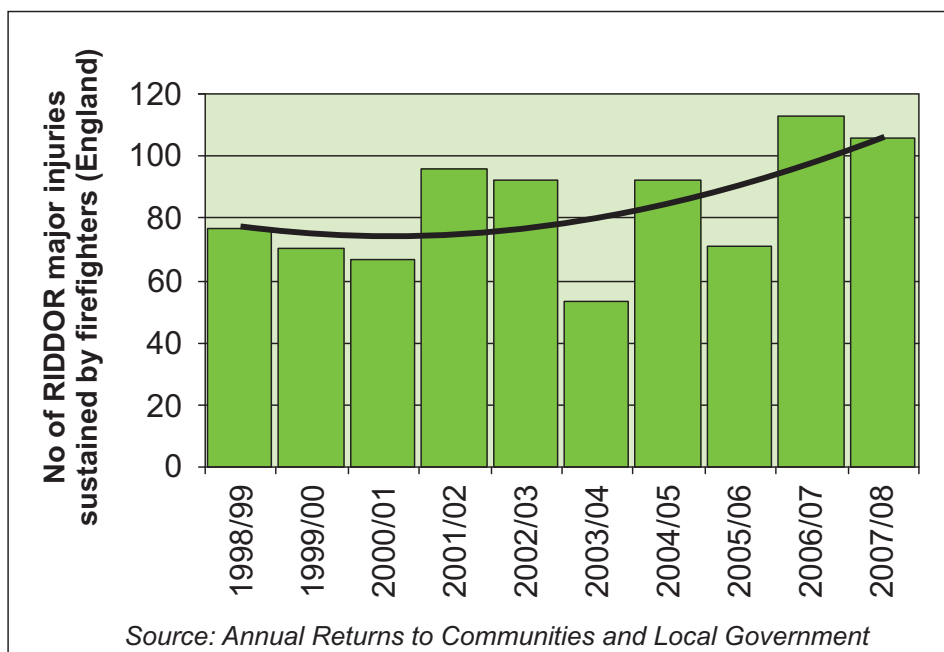


Figure 1

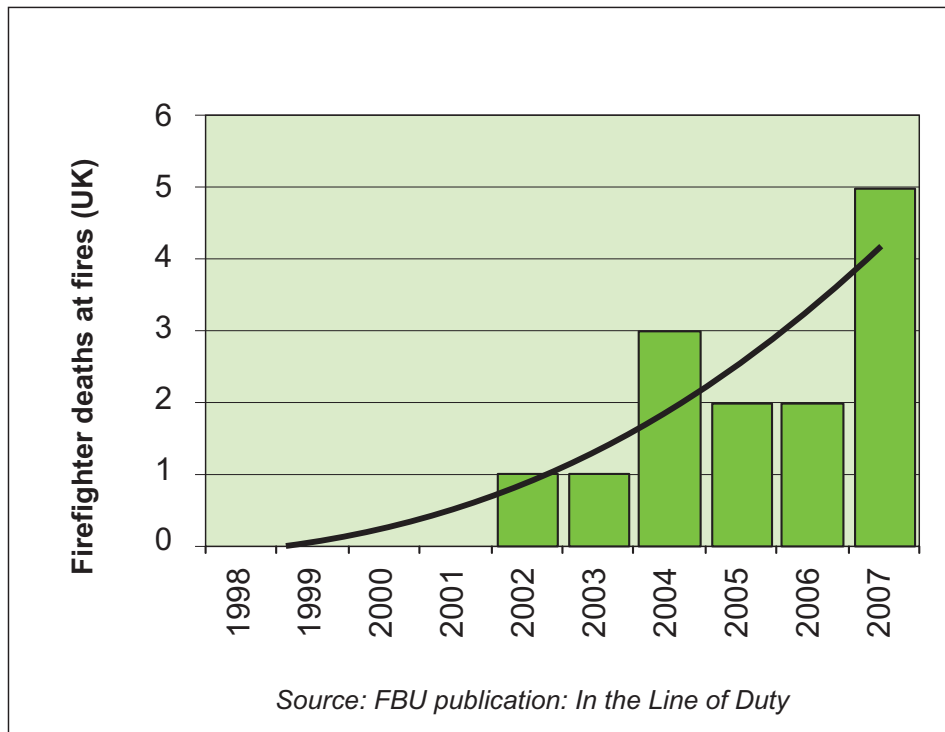


Figure 2

The FBU is firmly of the opinion that the recent increasing trends in firefighter injuries and fatalities is closely linked to so-called 'economy and efficiency' in the fire and rescue service. This has been highlighted in the union's recent *Firefighter Fatalities* report and its subsequent campaign on the issue. Neither CLG, the HSE nor anyone else has carried out any research to disprove this link, so the Audit Commission is certainly not in a position to say that further cuts will not increase risk to firefighters. The evidence indicates exactly the opposite.

The scope for savings

Paragraph 34

A recurring theme of the report is introduced in Paragraph 34. It suggests that 'by changing shift patterns and crewing arrangements to match more closely that cover to the time when it is needed', more 'efficiencies' might be made.

The time when cover is needed is a reference to the fact that nationally, the number of primary fires peaks

at 6 pm. There are fewer fires during the morning and the evening, and fewer still at night. The Audit Commission therefore concludes that fewer firefighters and fewer appliances are needed towards the morning and the evening, and fewer still at night.

This conclusion is indicative of how the Audit Commission does not understand effective fire cover.

If the Audit Commission demands that far fewer firefighters and appliances are made available during the night in order to match the fewer primary fires at night then the Audit Commission also needs to provide the crystal ball that is required to determine exactly where these resources will need to be located.

Of course, they cannot. The FRS has developed fire cover based on years of past experience and preparedness delivered through a risk-based process. To dismiss this and attempt to replace it with the system proposed by the Audit Commission would require the public to put its faith in fortune tellers as opposed to professionals.

The Audit Commission has displayed a dangerous lack of knowledge which would compromise firefighter and public safety in order to achieve savings. This is at the root of its lack of credibility. Regrettably, the commission

has not grasped the fact that it is necessary to provide a level of fire cover at night that is, in comparison to the number of fires, out of proportion to the level of fire cover that is provided during the day.

Paragraph 35

Paragraph 35 says that between 1997 and 2008 the number of wholetime firefighters fell by 1,700 from 32,300 to 30,600. It also says that the number of retained duty system (RDS) firefighters increased by 1,000 from 10,700 to 11,700.

The Audit Commission is right to present the number of RDS firefighters in '24-hour units of cover' but many of its other statements about the number of RDS firefighters mislead the reader by quoting gross figures. However, even the use of 24-hour units does not provide the full picture.

Ten RDS firefighters providing 12 hours cover each make up five 24-hour units. However, this does not mean that their fire appliance will be fully crewed with five firefighters 24 hours per day, seven days per week. Despite the best efforts of RDS firefighters, their primary employment commitments mean that it is entirely feasible that these 10 RDS firefighters will all provide their 12-hour cover during the same part of the day. Thus, the appliance will be over-crewed for half the time, and still be unavailable for fire calls for the other half.

It is misleading for the Audit Commission to describe RDS firefighter cover as a 'pay as you go service' which is therefore an efficient way of providing fire cover. The implication is, once again, that cost cutting can be made and 'savings' found. However, as any professional within the service knows, the true performance of using the retained duty system must be quantified in terms of appliance availability, not 24-hour units of cover. Regardless of the number of 24-hour units employed, it is a fact that pressures such as changes in demography and commitments to primary employment mean that RDS fire cover is often delayed or unavailable.

This has been recognised throughout the service and several bodies and groups have been set up to find solutions. It is therefore obvious to every professional in the service, especially those who work the RDS system, that the statement at the end of Paragraph 35 that 'this change in mix will have created efficiency savings' cannot be justified.

Paragraph 36

Paragraph 36 discusses changes in operational establishment. It talks about most fire and rescue services having made small-scale changes. However, it is important to stress the impact of accommodating even small-scale changes to the fire and rescue service.

In a tele-sales office where 20 people make 380 calls per day, it is possible to remove one employee and either to allow effectiveness to fall by 5% or to maintain the same level of service if the remaining 19 employees make 400 calls per day.

In modern 'HR speak' each member of staff is a self contained 'unit of productivity', and productivity is proportional to the number of members of staff.

The Audit Commission appears to believe that the fire and rescue service operates in the same way – that a cut of 5% in the number of wholetime firefighters just means that the remaining employees have to work 5% harder to make up the shortfall.

However the 'unit of productivity' of a fire and rescue service is a fire appliance, not an employee.

At its simplest level, a geographical area requires a fire appliance to be available 24 hours per day in order to provide for the safety of its population. Ignoring any absence of staff, to enable that fire appliance to be operated using safe systems of work, four shifts of five people are required to crew it.

Removing one employee may reduce the workforce by 5%, but it means reducing the crew of the appliance by 20% for one shift. This means that for one shift, safe systems of work cannot be implemented without adversely affecting operational effectiveness. In other words, this would compromise public and firefighter safety.

Thus, a 5% reduction in the workforce might appear like a small-scale change at the national level of 30,000+ firefighters, but its implications are large scale at the level of appliance crews and safety at incidents. It must be stressed that it is at this level that the fire service actually works.

Some large fire and rescue services have done their best to get around this issue by introducing complex crew rotas and 'flexible' appliance availability, but the take-up of such changes has been thankfully low because, unlike the Audit Commission, most fire and rescue service managers in small- and medium-sized

services know that when five people are driving one fire appliance to a house fire where people are trapped, there is no scope for even small-scale changes. Even small-scale changes at the fire appliance/crew level compromise firefighter and public safety.

Paragraph 37

Paragraph 37 says: 'In 2008 there were around 9,300 non-firefighting members of staff, up 35% from 2000.' Interestingly, unlike Paragraph 36 (that was discussing firefighting staff), Paragraph 37 only describes the change in non-firefighting staff since 2000, not since 1998. Presumably the number of non-firefighting staff in 2008 is more than 35% higher than the 1998 figure. Also, unlike Paragraph 36, Paragraph 37 glosses over the numerical increase in staff by failing to quote the actual number of non-firefighting staff present in 2000.

For 9,300 to be a 35% increase, there must have been about 6,889 non-firefighting staff employed in 2000 – a numerical increase of 2,411.

So according to the report, in the 10-year period 1998 to 2008, 'efficiency' has been achieved by getting rid of 1,700 wholtime firefighters. Yet in the same period, more than 2,411 additional people have been employed in non-uniformed posts. Nowhere in the report does the Audit Commission question whether or not this state of affairs represents 'efficiency'.

The only place where the 'efficiency' of the employment of non-uniformed staff is even mentioned is in Paragraph 134 where it is pointed out that the average sickness absence level of non-uniformed staff is 10 days per year, compared to 7.7 for uniformed staff. It seems to the FBU that Audit Commission's sole aim is to cut front-line firefighters and reduce emergency fire cover.

Paragraph 38

Paragraph 38 and figure 11 compare the gross increase in staff of the fire and rescue service with that of the police and the ambulance service between 2000 and 2007.

All three emergency services have seen increases in both operational and non-operational staff. However, no mention is made in the text of the fact that even the tiny 1% increase in operational fire and rescue staff shown on the graph is made up of 1,000 RDS 24-hour units, while the police and the ambulance service have seen increases in operational staff of 14% and 18% respectively.

Compared to other blue light services, the fire service has already undergone significant real terms cuts in staffing.

Paragraph 38 also says that part of the increase in non-operational police staff is on account of the introduction of 15,800 community support officers – who are not 'police officers', but who still deliver 'front-line services'. The report then appears to suggest that the same may be true for the fire and rescue service when it says that 'it is not possible to determine what proportion of non-firefighting staff in the fire service are delivering community safety work'.

This is a statement that is impossible to believe. On its website the Audit Commission says: 'We appoint auditors to provide assurance and promote value for taxpayers' money across local government, ... fire and rescue and other public services.' And yet after auditing fire and rescue services since 2005, they still find it 'not possible' to say what is being done by 9,300 non-operational employees – that is nearly 25% of the full-time employees of fire and rescue services, 2,411 of whom occupy new posts that have been created at the same time as 1,700 front-line service delivery posts have been cut.

It is astonishing that the Audit finds it 'not possible' to say how many staff are delivering the crucial role of community fire safety. Yet in Appendix A of the report, the commission's first option for making 'efficiency savings' is to further reduce the number of wholtime firefighters required to cover shifts.

Paragraph 40

Paragraph 40 highlights the dilemma faced by the Audit Commission and others who attempt to apply private sector economics to the fire and rescue service. The paragraph starts off by saying that:

With a declining number of incidents, higher expenditure and largely unchanged numbers of firefighters, stations and appliance, it has been argued that fire service productivity is declining.

But then it goes on to say:

Fire service productivity cannot be measured solely in terms of the number of incidents attended, as one of the service's aims is to reduce the level of such incidents.

If an output of the fire and rescue service is a reduction in the number of incidents, then, with a declining number of incidents, increases in expenditure largely to keep pace with national wage inflation and largely unchanged numbers of firefighters, stations and appliances, it should be argued that fire service productivity is improving.

But Paragraph 40 still concludes that:

Nevertheless, as risks change, fire services do need to consider whether they have the right amount and type of stations, equipment and people, in the right place, at the right time, to deal most effectively with those risks.

The Audit Commission therefore ducks the question of whether fire and rescue service productivity should be regarded as declining or improving. However, it is quite obvious that if the declining argument is followed, productivity can easily be turned around by stopping all community fire safety activity and by closing many of the country's fire stations. The number of incidents would increase, expenditure would be lower and the number of firefighters, stations and appliances would be reduced.

This suggestion is clearly nonsense, and therefore the whole argument that fire and rescue service productivity is in decline is equally nonsense.

The conclusion to Paragraph 40 and the immediately subsequent paragraphs return to the theme of the right equipment and people in the right place at the right time.

The fire and rescue service has known for many years that there are normally fewer fires at certain times of the day and night. It also knows that there is an

increased ratio of fire deaths per fire at night when compared to the day. But while of interest when looked at on the national scale, that information is of little practical use at the local scale. Large, hazardous, life-threatening fires do occur even in otherwise quiet times, and unless the fire and rescue service can perform the impossible and predict where and when they will break out, the only way to ensure the right equipment and people in the right place at the right time is to provide uniform cover across the whole country 24 hours per day.

Paragraph 41

Paragraph 41 discusses the move away from national standards of fire cover to IRMP and risk-based fire cover (primarily, but not exclusively, life risk). But it concludes by saying that 'the extent to which this has led to changes in stations, appliances or firefighters varies across fire services'.

However, this is not in the least surprising. The old national standards of fire cover called for the highest standard of cover in the built-up areas of city centres, lower standards in town centres and lower standards still in suburbs and rural areas. This approach was heavily criticised around the time of the Bain report, but the reality is that (with the exception of London), life risk generally varies in exactly the same way.

The poorest quality, high density, rented, multi-occupied high-risk housing is adjacent to the built-up areas of city centres, lower-risk housing is found surrounding smaller town centres, and the suburbs and rural areas generally contain the highest quality, lowest risk housing.

Bain used the 'example' of the City of London to illustrate his argument. He said:

Thus, to take the most extreme example we found, the population of the City of London is more than 500,000 during the day but drops to less than 5,000 at night, yet the fire cover and attendance times stay at the same level.

But the City of London is not just an extreme example, it is unique.

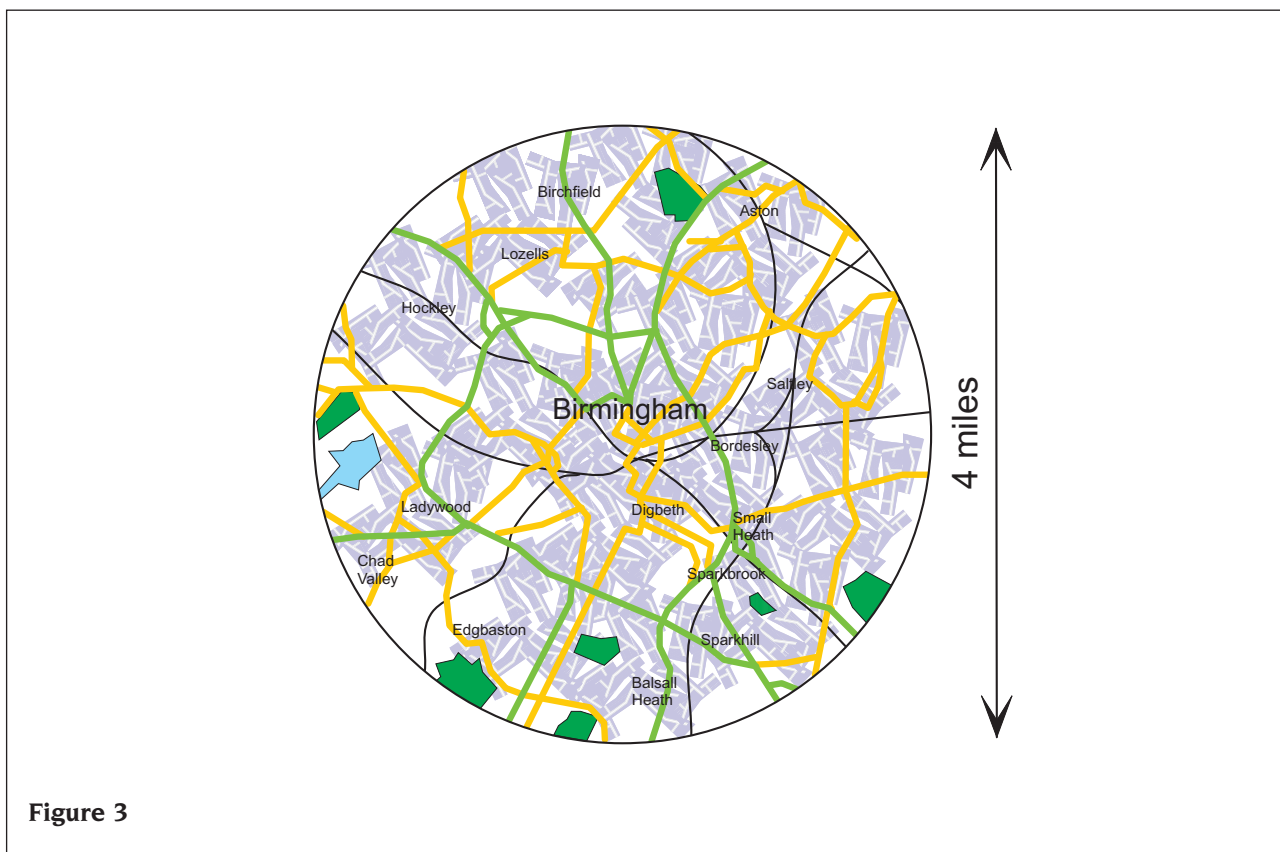


Figure 3

Figure 3 shows that even a two-mile radius of the centre of England's second city, Birmingham, contains some of the most deprived areas of the country – Lozells to the north, Ladywood to the west and Sparkhill and Sparkbrook to the south. Even though fire appliances would have initially been sited in the centre of Birmingham to meet the old standards of fire cover, there are still perfectly justifiable reasons why they should continue to do so in order to meet IRMP-based risk-assessed standards of fire cover.

The situation is even more clear in 'more typical' towns and cities such as Nottingham, Chester and Bradford.

The suggestion that they expected risk-based fire cover to have created uniform changes to the locations or numbers of stations, appliances or firefighters across the whole of England indicates that the commissioners do not properly understand the nature of fire risk.

Paragraph 44

Paragraph 44 discusses savings that have been made recently by fire and rescue services. Merseyside is one of the services that is named as making the most savings, while Warwickshire is named as a service that has made none.

Rather than name and shame Warwickshire, the commissioners should read Paragraph 47 of their own report to understand why this might be the case. It points out that:

Metropolitan fire services... can cover more densely populated areas with relatively few stations, compared to rural areas.

Merseyside employs over 1,000 uniformed staff, whereas Warwickshire has only one quarter that number. Merseyside is a densely populated metropolitan area, while Warwickshire has only four wholtime fire stations that are 15 miles distant from one another.

Merseyside, as a large authority and as described under Paragraph 36 above, has been able to introduce complex crew rotas and 'flexible' appliance availability. The cuts in front-line service provision that have

produced the Audit Commission's savings in Merseyside put people and property at greater risk, but other appliances can 'fill the gaps' and keep that increased risk below the radar of public concern.

If Warwickshire was to make similar savings to Merseyside, the cuts in front-line service provision would leave gaps that could never be filled by appliances that had to travel 15 or 20 miles to attend an incident. The increased risk would soon materialise as major property and life loss.

There is no scope for even small-scale changes in fire and rescue services that protect parts of the country like Warwickshire. Because, as previously stated, the 'unit of productivity' of a fire and rescue service is a fire appliance, not an employee, there is not even the scope for a shire service to make savings that are proportional to those of a metropolitan service (expressed as £s per wholetime firefighter or in any other way).

Instead of concentrating on graphs, lower quartiles and ratios, the Audit Commission needs to learn about both the risk environment and the operational environment in which different fire and rescue services are operating and should only compare like with like.

Where can fire services make savings?

Paragraph 46

Paragraph 46 reveals the motivation of the report:

To ensure they meet new efficiency targets, fire services will need to consider further whether they have the right number of stations and appliances, and the right crewing arrangements.

'Efficiency targets' have previously been identified as being a euphemism for cuts in funding, rather than anything to do with outputs or productivity. Consequently, fire and rescue services (such as Warwickshire discussed above) may indeed have the 'right number of stations and appliances, and the right crewing arrangements' in order to deliver an emergency service to the public, but they may not be able to 'meet new efficiency targets'.

This paragraph shows that when the Audit Commission

talks about things being 'right', it is not talking about a fire and rescue service that delivers an effective public emergency service. Rather, it is talking about one that delivers cash savings. Public safety does not appear in the report's statement about why stations, appliances and crews have to be 'right'.

Paragraph 48

Figure 4

	Busiest	Least busy
Wholetime single pump stations	850	175
RDS single pump stations	30	25

Paragraph 48 compares busy fire stations with less busy stations (see Figure 4). It states that the least busy RDS pump is seven times more expensive per incident to maintain than the busiest, and the least busy wholetime pump is almost three times more expensive per incident to maintain than the busiest.

It is, of course, equally true to say that the busiest RDS pump is only one seventh the cost per incident to maintain as the least busy, and the busiest wholetime pump is only one third the cost per incident to maintain as the least busy.

The most important point is that while the phrase 'unit of productivity' was used above to describe a fire appliance, it was used with a certain amount of irony.

For several years, the Post Office has been in the process of 'rationalising' its outlets. The cost of running them is weighed against their productivity, and if they are not financially viable, they are earmarked for closure. On almost every occasion, the post offices that fail to meet the cost versus productivity criteria are in rural locations, and the counter argument to closure is that post offices are not just 'units of productivity' in rural areas, they are a public service. And as a public service, they should be maintained even if they aren't profitable.

It may seem an embarrassingly obvious point to make, but given the thrust of the Audit Commission report it does need to be made: the fire and rescue service is a public service. There should be no question about 'profitability' being a criterion for provision.

Since the Holroyd report in 1970 it has been an accepted principle of fire cover that below a certain number of fire calls and, more recently, following a risk-based integrated assessment, it may be acceptable to crew a fire station using day crewing or RDS.

There is no doubt that the quantity of fire cover in rural areas is lower than that provided in urban areas, but the balance between the standard of cover and Holroyd's principle of competence is as true today as it was 40 years ago.

To suggest, as the Audit Commission does, that fire and rescue service provision should take account of 'cost per incident' is to move away from the very ethos of public service. Any suggestion that cost could come before effectiveness would, in the context of the fire and rescue service, be irresponsible.

It is true that the National Health Service makes 'cost benefit' decisions about the provision of new drugs, but these decisions are made by the National Institute for Health and Clinical Excellence (NICE). NICE comprises a number of independent advisory groups made up of health professionals, those working in the NHS, patients, their carers and the public. The Audit Commission does not have a similar authority, nor the necessary knowledge, to make such decisions within the fire and rescue service.

Paragraph 50

Figure 5

	Busiest	Least busy
One-pump wholetime stations	850	175
Two-pump wholetime stations	30	25

Paragraph 50 make similar points to Paragraph 48, except that it compares one-pump and two-pump stations (see Figure 5). The paragraph also compares dual wholetime/RDS stations and one- and two-pump RDS stations. Its summary is that the least busy two-pump stations are less busy than some one-pump stations.

Paragraph 51

Paragraph 51 implies that the least busy two-pump stations could be cut to one-pump stations to save money.

The paragraph does concede that 'there are valid operational reasons why some relatively quiet stations require a wholetime crew, or more than one pump, for example to provide cover in coastal areas that do not benefit from cross border back-up, or for major industrial facilities', but it goes on to say that 'the level of discrepancy in attendance rates by stations of the same type demonstrates that some fire services could provide fire cover more cost-effectively'.

But in saying that 'some fire services could provide fire cover more cost-effectively', the Audit Commission only mentions two reasons why it might be operationally essential to provide two appliances at fire stations that attend fewer than 850 incidents per year:

- Coastal town with restricted scope for backup appliances
- Proximity to 'special risk' such as an industrial facility or an airport.

Some other reasons that the Audit Commission fails to mention are:

- Nature of risk – primarily property fire risk or secondary fire risk?
- Lack of opportunity in the area to recruit staff on RDS contacts
- River border to station area with restricted scope for back-up appliances
- Resilience in case of two or more simultaneous incidents
- Isolated market town with restricted scope for back-up appliances
- Firefighter safety in areas where attacks on firefighters are common
- Backup pumps for special appliances
- An additional pump for safe systems of work where FRS rides four on regular occasions.

Fire and rescue services are no longer required to meet national minimum standards of fire cover. They are instead required to risk assess the emergency cover needs of their area and to provide sufficient resources to meet those needs. All of the above issues and more should be taken into account when a fire and rescue service carries out that assessment of risk.

However in Paragraphs 48 to 51, the Audit Commission is effectively suggesting that risk-assessed fire cover should be replaced by a simple table where the number and crewing arrangements of fire appliances are determined by the number of incidents.

Every professional within the fire and rescue service knows that the effective provision of fire cover is not as simple as the Audit Commission suggests. By suggesting that it is simple, the Audit Commission shows that it has not understood fire service operational risk management.

Case study 1

The Audit Commission's Case study 1 extols the virtues of using targeted response vehicles (TRVs) in Cheshire Fire and Rescue Service. The authors of the Audit Commission report have clearly accepted the idea that dealing with 'small fires' by sending small fire engines with small crews saves money.

On paper this may be the case, but the Audit Commission should have looked a little deeper than a paper exercise.

The nature of an emergency service means that in many cases there is scant detail about incidents until crews arrive on the scene. The public who call the fire and rescue service have their own concepts of 'small' and 'large' when it comes to uncontrolled fires. Therefore many 'small fires' have to attract the mobilisation of standard fire appliances because the size of the fire is uncertain at the time of call.

If the whole crew are off the station on their standard appliance, they would have to drive back to the station to drop off the small number of people required to take out the TRV – vastly increasing attendance time (and CO₂ emissions). So the TRV can only be used if the crew are on the station at the time of the call.

According to the report, mobilising a small crew on a TRV means that the rest of the station personnel have time freed up for additional community safety activity. But if part of the crew go to a 'small fire' on the TRV:

- There are now not enough of them left to crew a standard appliance, so they cannot provide further intervention cover.
- The only transport they have available to get to the community to deliver safety is the standard fire appliance (but it can't be used for incidents because of the lack of crew).
- If they do leave the station on the standard appliance or any other vehicle, only the TRV will be available for further incidents until such time as all people and all vehicles return to the station to sort themselves out.

In the case of an RDS crew, a saving is made if only a small crew is mobilised in a TRV, but again the standard appliance is then unavailable for incidents until such time as the TRV returns to the station.

For both wholetime and RDS crews, a standard appliance is usually available for further calls immediately it is freed at an incident and is returning to its home station. When TRVs are used, only the TRV is available for 'small fires' until it returns to the station where the standard appliance and the rest of the crew is waiting.

As a result of all these practical problems, TRVs are not used in the way envisaged by the Audit Commission. They do not deliver the kind of savings described. A true audit by a professional with expertise in fire and rescue service operational practice would probably reveal that they are an additional cost not a saving.

One way that TRVs *are* used is that they are crewed by RDS staff to attend small incidents from otherwise wholetime stations. RDS staff are paid an hourly rate to wait at these stations working as additional 'part-time staff' rather than 'retained staff'. This means that the wholetime crews are kept available for community safety work and to crew a standard appliance ready for larger incidents. This procedure is quite satisfactory as it addresses all of the practical problems listed above, but it actually means that TRVs are simply attending incidents to justify their existence. In reality, they are being used as additional appliances with additional crews at additional cost.

The following table is presented by the Audit Commission as part of its **Case study 1**:

Cost comparisons for TRVs and standard appliances			
Cost	TRV	Standard appliance	Saving
Initial capital cost	£100,000	£150,000	£50,000
Anticipated ten-year life costs (fuel plus maintenance)	£60,000	£143,000	£83,000
Annual CO ₂ emissions	60,000 tonnes	180,000 tonnes	120,000 tonnes

According to the European Federation for Transport and the Environment and other respected sources, if you burn a litre of diesel you will produce around 2.62 kgs of carbon dioxide. This is verified by chemistry on the assumption that diesel is typically C₁₂H₂₃ and that it burns to CO₂ and H₂O with a little carbon and CO.

The Audit Commission says that a 'standard appliance' creates 180,000 tonnes of CO₂ per year. So how many litres of diesel do you have to burn to produce 180,000 tonnes of CO₂?

$$180,000 \text{ tonnes} = 180,000,000 \text{ kg.}$$

$$180,000,000 \text{ divided by } 2.62 = 68,702,290 \text{ litres}$$

So, to produce 180,000 tonnes of CO₂ by driving a standard appliance it would have to consume over 68,700,000 litres of diesel in a year – about 188,000 litres every day.

A standard appliance uses in the region of five litres of diesel to travel eight miles, so 188,000 litres of diesel would take a major pump about 300,800 miles. To achieve this distance in one day, the standard appliance would have to travel at 16.5 times the speed of sound for 24 hours!

The FBU was initially of the opinion that the Audit Commission might have got mixed up between tonnes and kilogrammes in its table, but even 180,000 kg of CO₂ represents a mileage of 300 miles a day, 365 days a year. This is still unrealistic.

The Audit Commission is equally skilled in physics and chemistry as it is in fire and rescue service operational management.

Case study 3

Case study 3 describes Greater Manchester Fire and Rescue Service (GMCFRS). Interestingly, the first paragraph says that in developing a 'flexible' duty system, GMCFRS 'identified best practice in the private retail sector'.

The reader may well ask: What is the relevance of 'best practice in the private retail sector'?

The level of service delivered by the private retail sector is determined by economics, not by customer need. Its prime function is to make money for directors and shareholders. GMFRS is a public emergency service.

The private retail sector is notorious for poor wages and high staff turnover. The fire and rescue service is a labour-intensive service industry where quality can only be delivered by committed, motivated staff.

Success in the private retail sector is based on low wholesale purchase costs, high turnover of goods and low prices. Success in the operational side of the fire and rescue service is based on rapid deployment and the effective use of assets. There is no turnover of goods.

The private retail sector succeeds by dropping unpopular lines, and replacing them with more popular products. The fire and rescue service cannot dispense with the provision of services such as the New Dimension programme (which deals with equipment, procedures and training to deal with incidents such as chemical, biological and nuclear incidents, terrorist threats and floods and earthquakes) simply because it has never been used.

Since GMFRS is a public emergency service, would it not have been more appropriate to look for inspiration from best practice in the public emergency service sector?

Figure 6 shows examples of the outcomes of GMFRS:

Figure 6	
Salford Advertiser 30 September 2007:	Salford Advertiser 30 April 2008:
<p>A PENSIONER had to be rescued from a blaze at her home by builders because firefighters in the area were dishing out fire safety leaflets.</p> <p>The 89-year-old woman was pulled to safety just seconds before her bedroom window was blown out.</p> <p>Michael, from Bolton, said it was 'crazy' that the local firefighters had been tied up leafleting rather than rescuing the pensioner.</p>	<p>HOMEOWNERS who lost all their belongings in a massive fire at a Greater Manchester storage warehouse have told how they are coming to terms with the disaster.</p> <p>Around 300 customers lost possessions when the John Bradshaw warehouse, in Trafford Park, went up in flames. Many had been storing all their furniture while they moved house.</p>

By selecting GMFRS as an example of 'efficiency' worthy of a case study' the Audit Commission is not using the true definition of 'efficiency' that takes output into account. GMFRS has recently failed to meet the target for preventable fire deaths. The Audit Commission has simply carried out a desktop audit, appears not to have physically investigated the output of GMFRS, and has only considered the cost of input.

Paragraph 55

In Paragraph 55, the report looks at problems with recruitment and retention of RDS staff. It says that the Task and Finish Group set up to monitor progress on the recommendations of the 2005 review of RDS provision 'recognised that much more work needs to be done to deliver the vision set out in the 2005 review.

While the report goes into detail about the potential savings that could be made by cutting services, it does not discuss the cost of delivering 'the vision set out in the 2005 review'.

The overall conclusion of the report is a summation of the amount of money that the fire and rescue service could 'save' if levels of service were reduced to the lowest common denominator, but no mention is made of the new costs associated with new roles and the delivery of 'visions'.

Paragraph 57, Figure 18 and Figure 19

Paragraph 57 says:

There is no evidence that making savings has adversely affected safety. Changes in the number of injuries in fires in the home, and injuries to firefighters, in those fire services that have made the biggest savings are comparable to changes in other fire services.

Figures 18 and 19 supposedly support this statement by showing graphically that fire and rescue services that have made the largest savings have not done so at the cost of more injuries to the public (Figure 18) or firefighters (Figure 19).

However, while the numerical data presented by Figures 18 and 19 may be correct, neither figure has any statistical validity, and they do not support the statement made in Paragraph 57.

Firstly, Figures 18 and 19 purport to be intrinsically linked, supporting the argument that services making the largest cuts have not done so at the cost of more injuries to the public or firefighters respectively. And yet data in each figure is taken over different periods:

- Figure 18 shows changes in injuries to the public from 2003/4 to 2006/7;
- Figure 19 shows changes in injuries to firefighters from 2004/5 to 2006/7.

Why the difference if they are both supporting the same argument?

Secondly, the periods of time for which the data is shown is meaninglessly short. Figure 18 is comparing public injury data separated by three years, while

Figure 19 is comparing firefighter injury data separated by only two years.

There is much advice available relating to the use of statistics to assess fire and rescue service performance, and none of it suggests that two years' worth of data makes a trend.

By way of an example, the CLG publication *Fire and Rescue Service partnership working toolkit for Local Area Agreements: 2008* suggests that an **average** of two or three years' data should be used as a baseline for further measurement. The Scottish government guidance for IRMP says that '*five years may be considered a suitable period for analysis that will reveal a trend*'.

The suggestion that data separated by two years can be used to demonstrate a trend (or lack of a trend) in an area as complex of firefighter injury is, statistically speaking, shameful. And if anyone should know that, it is the Audit Commission.

Finally, it is important to realise that both figures only show changes in the number of injuries at operational incidents. With the number of incidents declining, it stands to reason that the number of injuries should also be in decline. But when the number of RIDDOR¹* firefighter injuries (Figure 1 of this document) is related to the number of fires reported by the Office for National Statistics, the picture across England is one of a rising frequency of firefighter injuries per fire since 1998/99 (Figure 7).

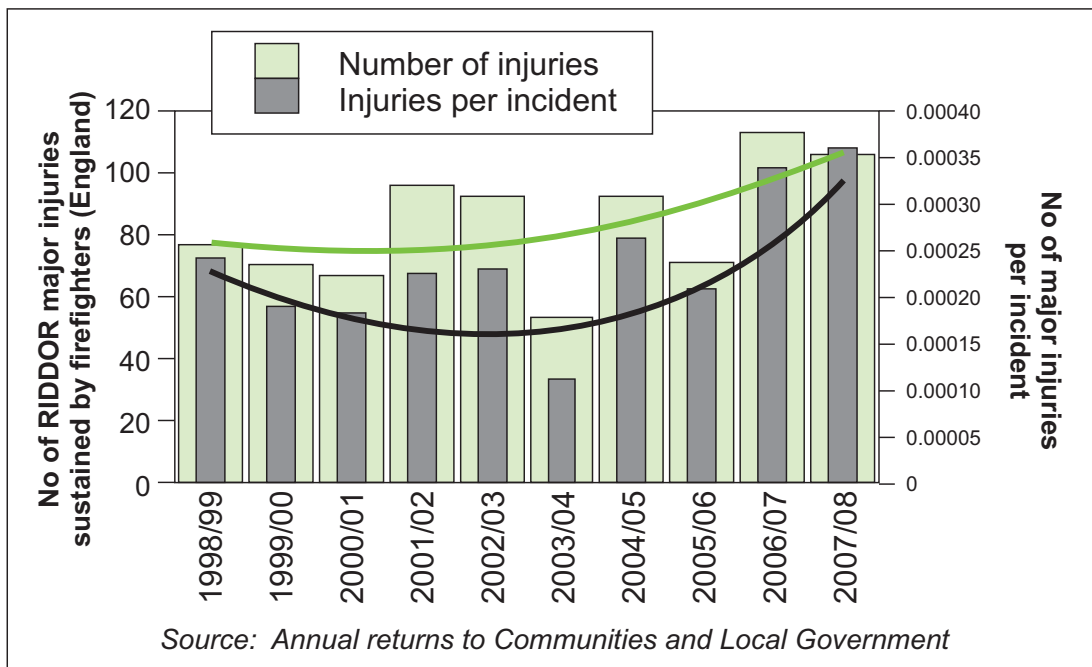
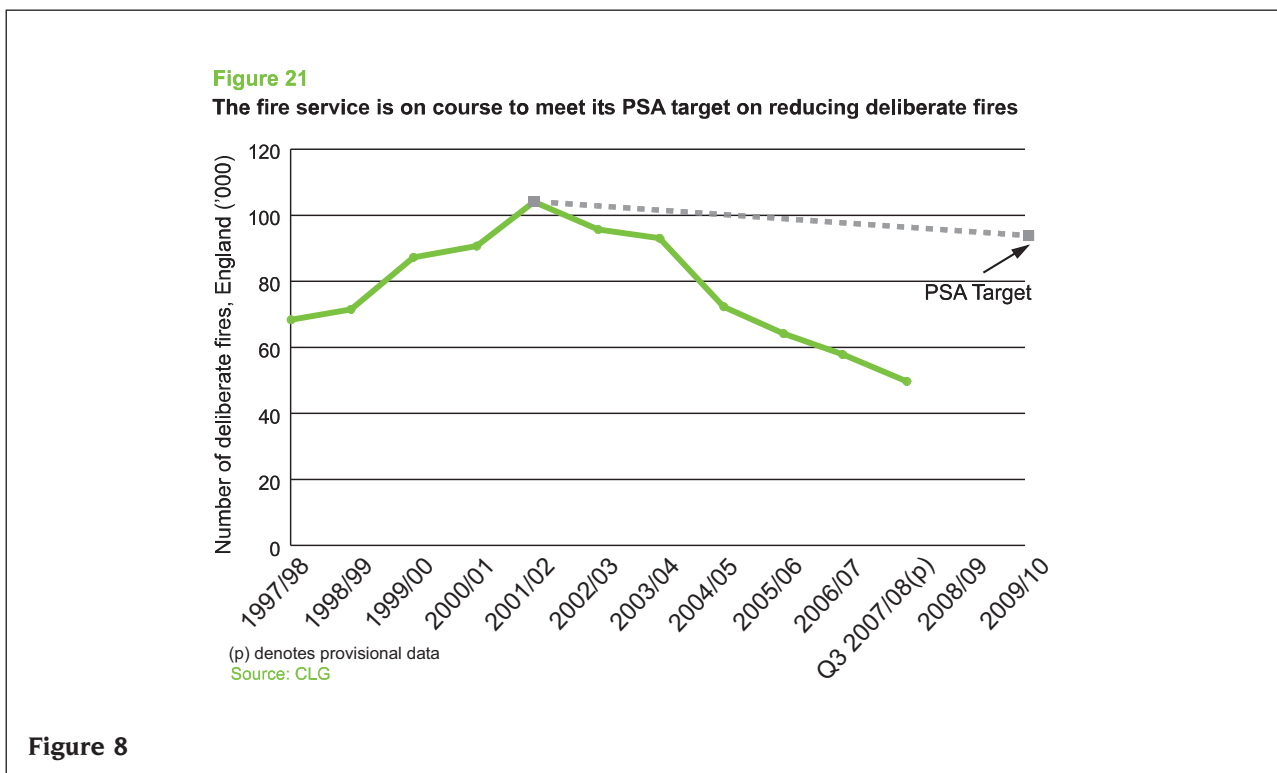


Figure 7

The Audit Commission report's treatment of fire injury is not statistically valid, and is superficial in its approach to firefighter safety.

¹* RIDDOR: The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) place a legal duty on employers to report work-related deaths, major injuries, work-related diseases, and dangerous occurrences (near-miss accidents).

4 The performance challenge



Overall, performance is strong but variable

Paragraph 63

Paragraph 63 and the associated Figure 21 (reproduced as Figure 8 above) appear to show a very positive trend in the number of deliberate fires since 2001/02. They show that from 1997 to 2001/2, deliberate fires were increasing year on year, then from 2001/2 to 2007 they started falling year on year. Clearly the suggestion is that things were constantly getting worse until 2001/2, then something was introduced in 2001/2 that caused things to constantly get better.

Paragraph 64 contains the statement:

...the largest falls in fires have been in those areas where the fire service has concentrated much of its CFS work.

This implies that the dramatic turn around from a rising rate of deliberate fires to a falling rate is as a result of fire service CFS work.

But it isn't.

Figure 9, overleaf, is created from CLG fire statistics contained in *Fire Statistics, United Kingdom 2006*, Communities and Local Government, 2008. By breaking down deliberate fires into type, Figure 9 shows more detail than the Audit Commission's Figure 21.

It shows that while the efforts of the fire and rescue service (and others) have had a moderate effect of steadily driving down the number of deliberate building and outdoor fires, the dramatic turn around in the Audit Commission's Figure 21 is actually caused entirely by changing numbers of deliberate vehicle fires.

It is true that some fire services introduced vehicle removal schemes to attempt to influence the frequency of deliberate vehicle fires. But every serious commentator in the fire industry attributes the rise and fall of deliberate vehicle fires to improvements in car security and the fluctuating price of scrap metal.

By putting its Figure 21 into a section of a document describing the performance of the fire service, without explaining how the shape of Figure 21 was derived, the Audit Commission is deliberately misleading the reader.

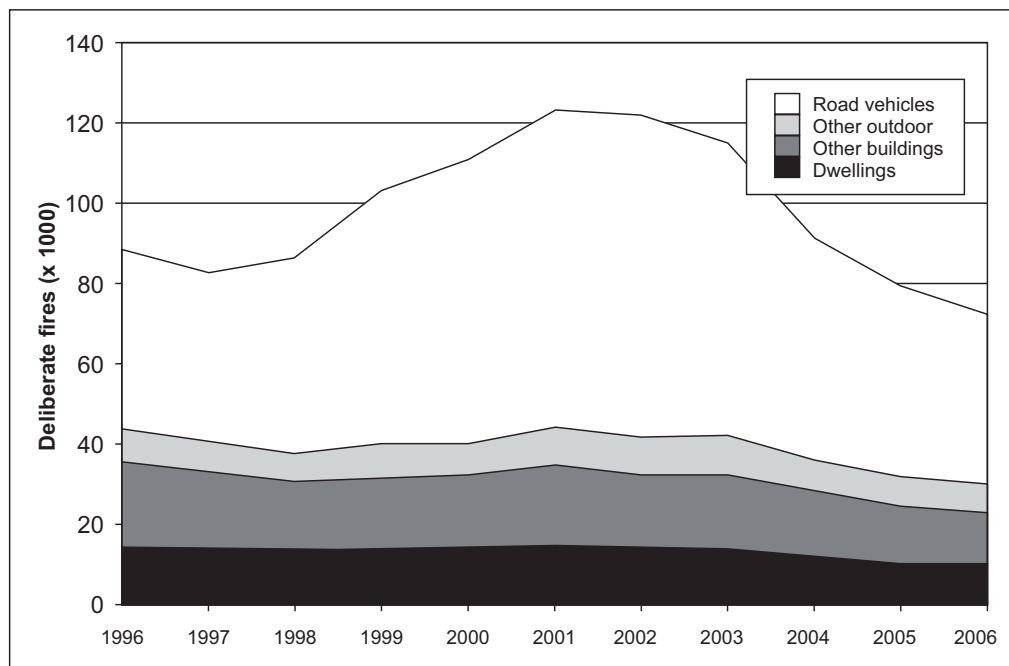


Figure 9

Paragraph 64

Paragraph 64 says:

*The number of primary fires attended by the fire service has fallen by 22 per cent since 1997/98. This is not wholly attributable to fire service activity; other factors, such as the state of the economy, play their part. But there is evidence that the fire service has contributed significantly, **as explained later in this chapter. [Our emphasis]***

However no such explanation is subsequently provided.

- Figure 29 is entitled 'There is no clear pattern between expenditure and reductions in primary fires'.
- Paragraph 76 says: 'Some evidence suggests fire services' CFS work is having a positive impact; but other research suggests that much of the recent reduction in fires and related casualties is the result of legislative, regulatory, and environmental change outside fire services' direct control.'
- Paragraph 77 says: 'Twenty-two of the [Arson Control Forum's] 24 projects evaluated were deemed to have reduced deliberate fires'. But Paragraph 78 goes on to say that

'other research suggests that recent reductions in vehicle arson are largely attributable to changes in legislation concerning the disposal of vehicles and the rising price of scrap steel'.

- Paragraph 79 says: 'Other research suggests that much of the fall in casualties in domestic fires over the last 20 years is attributable to the increasing prevalence of fire retardant household goods (especially foam filled furniture) and smoke alarms.'

The only 'significant' thing that the document reports the fire and rescue service as having achieved (in the context of the number of primary fires falling by 22%) is that: 'The fire service has made a significant, direct contribution to increasing smoke alarm ownership by fitting 2.4 million smoke alarms since 2004.' (Paragraph 81)

But even this is tempered later in Paragraph 81 when it is pointed out that: 'Ownership levels will have been affected by other factors, such as legislation requiring newly-built properties to be fitted with smoke alarms. This makes it difficult to determine the direct impact of fire service activity.'

Besides which, Paragraph 80 says that 'a smoke alarm was present and activated in only two-fifths of the domestic fires attended by the fire service in 2006/07'.

So the report significantly qualifies its own statement that 'there is evidence that the fire service has contributed significantly' to increasing smoke alarm ownership.

Paragraph 64 also mentions the fall in accidental fires in the home (22%) and related injuries (28%) since 1997/98. However, it must be remembered that there had been a reasonably steady downward trend in the number of domestic fire deaths long before the fire and rescue service fully took up the baton of community fire safety (see Figure 10).

In fact, fire deaths fell by more than 28% in the years 1988-98 (Figure 10). Since that fall was achieved without any major fire prevention input from the fire and rescue service, it is impossible to say that the more recent downward trends in fire measures are 'significantly' anything to do with fire and rescue service activity.

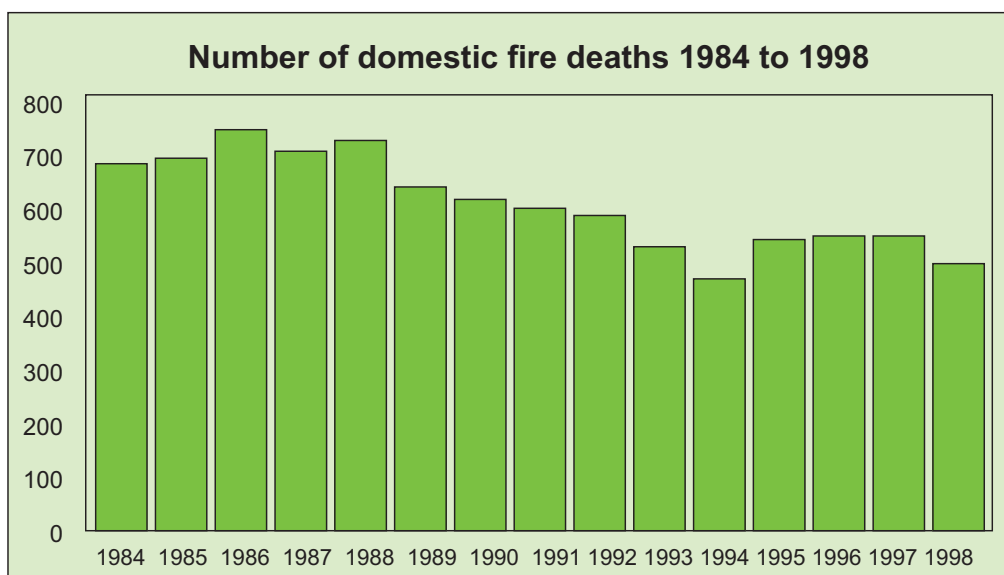


Figure 10

Paragraph 67

Paragraph 67 describes the fire and rescue as a whole as performing well. One of the things it mentions is that fire services have conducted 2 million HFSCs (home fire safety checks). But Paragraph 16 of the Audit Commission's Comprehensive Performance Assessment of Cornwall Fire and Rescue Service (January 2009) says that:

The culture of focusing on targets rather than on outcomes can be a problem. For example in order to report high

numbers of HFSCs the FRA allows staff to record delivery of a leaflet to a home as a safety check. This has resulted in the FRA reporting a sharp increase in completed safety checks but over fifty per cent of the residents called upon received a leaflet not a home safety check. These 'checks' are not necessarily making people safer and Cornwall's HFSC figures are not comparable with elsewhere.

Are Cornwall's HFSC statistics included within the 2 million figure quoted in the report? How many other fire and rescue services have been carrying out the same or similar target-focused recording of activity?

Paragraph 68

Paragraph 68 looks at the number of home fire safety checks (HFSCs) carried out by different fire and rescue services. Fire and rescue services that 'embraced' HFSC are those that have visited over 30% of domestic properties in their area, while those that have visited less than 5% are implicitly criticised.

The paragraph admits that HFSCs should be targeted at high-risk properties, and therefore 'some of the variation is explained by the proportion of properties that fire services feel are at risk; and some is explained by the volume delivered by partners'. But it goes on to say that 'given the extent of the variation, it is unlikely to be explained entirely by these factors'.

Yet Paragraph 84 of the Audit Commission report points out that analysis commissioned by CLG 'found that factors associated with deprivation explained almost 70% of the variation in domestic fire rates between fire services'

If 70% of the variation in domestic fire rates can be explained by variations in deprivation, then it is entirely understandable that there should also be significant variations in the number of risk-assessed HFSCs carried out.

If for example, as seems likely, Merseyside has a six times greater proportion of deprived households than Norfolk, then it is entirely reasonable that Merseyside Fire and Rescue Service should have carried out six times more HFSCs than Norfolk Fire and Rescue Service.

Paragraph 69

Paragraph 69 returns to another problem that has been faced by fire and rescue services since long before the Audit Commission became involved.

Public satisfaction with the fire and rescue service has long been a performance indicator in one way or another. Paragraph 69 says that in 2006/07, public satisfaction with the fire and rescue service was good at 59%. However, since there is no common way to measure public satisfaction, the whole paragraph is meaningless.

- No two fire services measure 'public satisfaction' in the same way. So it is not legitimate to compare the amount of 'public satisfaction' with one service against another (as the Audit Commission does).
- The majority of the population have no contact

with the fire and rescue service so their level of 'satisfaction' is only conceptual.

- Even those who do have contact with the fire and rescue service generally have nothing against which to compare the performance of the service. They do not even have idealized versions of the service transmitted to them through the media as they do with police performance through numerous TV dramas that show a crime committed at the start of the show and the culprit behind bars at the end.

The sad truth is that if a fire could have been extinguished in its early stages, but it is allowed to spread and engulf a whole building because of poor firefighting or poor fire service policies, the public will almost invariably still say they are satisfied with the service they have received. The public have no idealised version of the fire service where a small fire breaks out at the start of a TV show and it is extinguished with minimal damage by the end. Succeed or fail, the media and the public always have a positive image of the fire service.

By talking about public satisfaction with the fire service as though it can be quantified and compared like the number of HFSCs carried out, the Audit Commission again shows its naivety when it comes to the fire and rescue service.

Paragraph 70

Paragraph 70 considers the Audit Commission's own Comprehensive Performance Assessment (CPA) scores of fire and rescue services, and the assessment of 'direction of travel'.

The paragraph says that '*we also reported that those fire services with higher CPA scores tended to be improving at a faster rate*'. This is worthy of a little more consideration.

In 2006, 2007 and 2008, the Audit Commission assessed each fire and rescue authority in England and determined their 'direction of travel'. There were four levels of 'direction of travel' and each was given a descriptor:

1. improving strongly
2. improving well
3. improving adequately
4. under review.

The performance of each authority for each of the three years can be found in the following Audit Commission documents:

- *Scores and analysis of performance in fire and rescue authorities 2006; Fire & Rescue National Report April 2007; Fire and rescue performance assessment*
- *Scores and analysis of performance in fire and rescue authorities 2007; Fire & Rescue National Report January 2008; Fire and rescue performance assessment*
- *Scores and analysis of fire and rescue authorities' performance 2008 Scores; Community Safety National Report 2009; Fire and rescue performance assessment*

If we choose to award a fire and rescue authority three points each time it 'improved strongly', two points each time it 'improved well', one point each time it 'improved adequately' and no points if it was 'under review', we are able to add up the performance (according to the Audit Commission) of each fire and rescue authority in England.

By going through this process, we find that (according to the Audit Commission) the top 16 performing fire and rescue authorities from 2006 to 2008 include London, all the metropolitan authorities, and four of the top five largest non-metropolitan authorities in England.

Authority	'Direction of travel points'	Type of authority
● Kent and Medway	8	4th non-met
● Shropshire & Wrekin	8	
● London	7	London
● Hampshire	7	1st non-met
● West Yorkshire	7	Metropolitan
● Lancashire	7	5th non-met
● Derbyshire	7	
● Merseyside	6	Metropolitan
● Greater Manchester	6	Metropolitan
● Hereford and Worcester	6	
● Cleveland	6	
● Essex	6	2nd non-met
● Tyne and Wear	6	Metropolitan
● Buckinghamshire and Milton Keynes	6	
● South Yorkshire	6	Metropolitan

NOTE 1: Ranking of non-mets is by population of county according to Fire and rescue service statistics 2008: CIPFA

NOTE 2: The third largest non-met is Devon and Somerset with a population of 1.65 million. But they were two separate fire authorities when the Audit Commission first assessed them, only recently going through the process of merger.

Quite clearly, the Audit Commission's CPA scoring process and 'direction of travel' assessments simply reward the largest fire authorities who have the most resources to deliver services and can make the largest cuts to their budgets (and services) without increasing the risk to the public to a level that causes alarm.

Of the Audit Commission's top 16 fire and rescue authorities, only five have done anything other than 'be big', and are therefore worthy of further note:

- Shropshire and Wrekin
- Derbyshire

- Hereford and Worcester
- Cleveland
- Buckinghamshire and Milton Keynes

It is clearly easiest to impress the Audit Commission and show good use of resources if a fire and rescue service **starts off with plenty of resources**. And yet the Audit Commission does not seem to appreciate that resources equals success as it calls for the indiscriminate slashing of resources across the whole sector.

FBU case study 1

Two Hertfordshire firefighters died at a fire at a block of flats at 85 Harrow Court, Silam Road, Stevenage on 2 February 2005. Using breathing apparatus, the firefighters had rescued one victim and were attempting to rescue another when they were killed.

In July 2005, the Audit Commission carried out a Comprehensive Performance Assessment (CPA) of Hertfordshire Fire and Rescue Service (HFRS). The subsequent report described HFRS as 'fair'. The Audit Commission claimed in the executive summary of its 2005 report that:

CPA is an assessment, at the corporate level, of how well the Authority is being run. It does not give an opinion on how well the fire service responds to emergency incidents.

However, the report is then full of value judgements about emergency response matters.

In 2006, Hertfordshire Fire and Rescue Service (HFRS) underwent an Operational Assessment of Service Delivery (OASD). Under the heading of operational preparedness, the 2006 assessment said:

HFRS has had to cease using its 'hot fire' training facility. As a consequence operational some staff expressed their concerns due to the fact that they are no longer able to experience realistic hot fire training. HFRS are in the process of negotiating a joint training agreement with an alternative provider to utilise their hot fire training facility. HFRS are planning to purchase a bespoke LPG hot fire training unit for use by their operational staff in

the near future. Nevertheless this is seen as an important training and assessment facility that is presently not available to operational staff.

Despite this, HFRS was scored as 'performing well' in the area of operational preparedness. The descriptor for 'performing well' is 'consistently above minimum requirements'.

The Audit Commission continued to inspect HFRS in 2006, 2007 and 2008. Its assessment of HFRS's 'direction of travel' was 'improving well', 'improving adequately' and 'improving well' respectively.

In 2008, the Audit Commission said of HFRS:

Hertfordshire Fire and Rescue Service is performing well in all areas of service delivery from its initial analysis of risk through to emergency response.

(Note the change since 2005. By 2008 the Audit Commission was quite prepared to offer an opinion on emergency response).

With three years of constant improvement (according to the Audit Commission's own assessment), and consistent performance above minimum standards (according to the Operational Assessment of Service Delivery), it would be reasonable to conclude that HFRS must have put the tragic events of Harrow Court behind them.

However, on 21 April 2009, Hertfordshire Fire Authority was issued with an improvement notice by the Health and Safety Executive (HSE) stating:

...refresher training on aspects of Breathing Apparatus (BA) use has not been delivered to Firefighters by a BA Instructor within the last two year period and is not currently planned to be delivered in the near future, including BA emergency procedures and BA entry control procedure, which were identified as issues in the Harrow Court investigation.

This case highlights that the current audit and inspection regime of fire and rescue services is meaningless when held up against the outcome of a truly independent and professional inspection as carried out by the HSE. HFRS was not 'improving well' and was not performing 'consistently above minimum requirements' between 2005 and 2009. Had it been, the HSE would not have issued an improvement notice.

In *Rising to the challenge*, the Audit Commission bases its assumptions about the capacity of the FRS to absorb financial cuts on its own assessments of FRS performance. It says that FRSs that have made the greatest savings have not adversely affected performance and that 80% of FRSs are performing well – implying that the service is predominantly healthy.

But the example of Hertfordshire shows that the Audit Commission is not competent to assess the performance of fire and rescue services. The outcomes of their assessments of performance are fundamentally flawed and do not stand up to scrutiny.

The impact of fire service prevention work

Paragraph 75

Paragraph 75 attempts to link increases in fire and rescue service funding with reductions in primary fires. Not surprisingly, no clear link is found.

The report says that the relationship between funding and fires 'will be affected by both how well fire services convert inputs (in other words, funding) into outputs (for example, prevention work), and how well those outputs drive outcomes (reductions in fires)'.

Firstly, it is true that some fire and rescue services have had significant successes in reducing primary fires (especially dwelling fires) where they have been able to invest significant resources into large areas of high-risk/deprived housing. However, these fire and rescue services are the exception not the norm.

Most fire and rescue services protect predominantly rural areas with villages, market towns, and occasionally a city. In these environments, areas of high risk/deprived housing are small and widely dispersed. To have any kind of an effect on the frequency of fire in these areas, a greater proportional amount of effort must be expended, but the returns will still be proportionately smaller.

A fire safety campaign in a deprived borough of a metropolitan city that cuts fire frequency by 50% might equate to, say, 75 fewer fires appearing on the statistics. But a fire safety campaign in a small council estate on the edge of an otherwise affluent market town that cuts fire frequency by 50% will equate to, say, just five fewer fires appearing on the statistics. The reduction of 75 fires will be visible in the statistics above the 'background noise' of other fires, but the reduction of five fires will not.

There will never be a correlation between investment and fire frequency in the majority of English fire and rescue services, and to look for one is naive.

Secondly, there is no need to expect to find a link between increased funding and reductions in primary fires because, while reducing primary fires is clearly a high priority for fire and rescue services, there are many other equally high priorities competing for resources: the wages of 2,411 additional non-firefighting staff employed since 2000 to name but one.

Paragraphs 79 and 80

Paragraph 79 looks at the reducing number of casualties in domestic fires over the last 20 years. Of interest is the statement in Paragraph 80 that

According to national surveys, smoke alarm ownership has risen from less than 25% to over 80% since 1998, although it must be noted that a smoke alarm was present and activated in only two-fifths of the domestic fires attended by the fire service in 2006/07.

The Audit Commission report is clearly suggesting that in 1998, less than 25% of households had smoke detectors, but at the time of publication (or by 2006/07), over 80% had smoke detectors.

The following paragraph, Paragraph 81, says that:

The fire service has made a significant, direct contribution to increasing smoke alarm ownership by fitting 2.4 million smoke alarms since 2004.

So the implication is clearly that *recent* changes to the fire and rescue service activity have coincided with (if not caused) a massive increase in smoke alarm ownership.

The reference for the figures quoted by the Audit Commission is: *Fire Statistics, United Kingdom 2006, Communities and Local Government, 2008.*

However, Table 2.3 of *Fire Statistics, United Kingdom 2006* actually says that **in 1998, 82% of households had smoke detectors**. The table says that it was in 1989, not 1998, that smoke alarm ownership was only 25%.

So the Audit Commission, whether as a result of sloppy work or misunderstanding, has misquoted the official figures. The massive increase in smoke alarm ownership actually preceded all of the changes that the Audit Commission claims have been so influential.

Paragraph 81

Paragraph 81 says that 'early evidence suggests' that home fire safety checks are having a positive impact. To back up this statement the report includes a chart (Figure 30) the Audit Commission has compiled showing percentage reductions of accidental fires in the home where HFSCs have been carried out from October 2004 to March 2008. While it only says that there is 'some suggestion' that HFSCs are having a positive impact, the report does not point out that there is no independent evidence to support this

contention. The commission would have been better advised to call for such research.

Paragraph 82

Paragraph 82 says that fire and rescue services should 'should focus on those aspects where there is a demonstrable link to reduced risk; for example installing smoke alarms and removing abandoned vehicles'.

Removing abandoned vehicles certainly improves the value of a community, but fires in abandoned vehicles do not present a life risk, and the abandoned vehicles themselves are frequently only worth their scrap value. Removing abandoned vehicles is a poor example of an activity that has a 'demonstrable link to reduced risk'. Its use shows that the Audit Commission does not actually understand the meaning of risk as it relates to fire and rescue service activity.

4a The true performance challenge – the FBU view

Introduction

The performance challenge faced by the fire and rescue service is much broader and deeper than is revealed by the headline fire statistics and the questionable outcomes of Comprehensive Performance Assessment (CPA) and Operational Assessment of Service Delivery (OASD) examined by the Audit Commission in *Rising to the challenge*.

FRS performance cannot be neatly boxed off into emergency intervention performance and fire prevention activity. And emergency intervention performance, in particular, cannot be considered without a parallel consideration of staff health, safety and welfare. The analysis of staff health and safety within *Rising to the challenge* is both limited in its extent and dubious in its validity.

Measuring fire safety

In March 2005 the Central Economic Advice Division & Fire and Rescue Service Directorate produced a research document entitled *Measurement of Output and Productivity of the Fire and Rescue Service; A Conceptual Framework*. Its executive summary states;

... the FRS has a number of distinctive features that make output and productivity measurement complex. Measuring the full impact of fire safety and prevention work is virtually impossible because the relationship between the activity and final outcomes (reduced fire deaths or property damage) is not observed. This requires measuring what has not happened.

It may well be true that it is virtually impossible to measure the impact of fire safety activity. But as the role of the Audit Commission is to ensure that the FRS is providing value for public money, it would have been logical for them to have attempted to do so when considering the performance challenge to the FRS.

Oscar Wilde defined a cynic as 'a man who knows the price of everything and the value of nothing'. The Audit Commission knows the price of the fire and rescue service but has no interest in finding out its value.

Special services are now put on a statutory footing

On 1 October 2004 the legislation that had provided the statutory footing for the fire service for over 50 years, the Fire Services Act 1947, was replaced by the

Fire and Rescue Services Act 2004. The 2004 Act imposes a new duty on FRSs to attend non-fire incidents such as road accidents, chemical spills, collapsed buildings etc.

In fact, despite the absence of any strict legal requirement to do so, the fire service has always attended non-fire emergencies but, unlike fires, these incidents have never been subject to strict performance evaluation against nationally recommended standards.

It should be the function of an OASD to say whether or not an FRS has properly assessed the non-fire risk in its area and set appropriate performance standards. But now that it is a legal requirement to attend non-fire incidents, it might be expected that the Audit Commission would look at the cost associated with preparing and equipping to safely deal with such emergencies, and the value to the community of the FRS's response.

But again, no attempt is made to assess the value of the fire and rescue service, only the cost.

Historical background to fire cover

According to the Bain report of 2002, national minimum standards of fire cover originated from work done by the Riverdale Committee in 1936. Bain said that 'they were updated most recently in 1985, but changes were modest'. Since Bain, many uninformed commentators and those wishing to show their allegiance with the change agenda, have criticised the old national standards of fire cover because they were based on principles that were over 50 years old.

The 1985 report of the Joint Committee on Standards of Fire Cover carried out a root and branch review of the suitability of standards of fire cover and came to the conclusion that they were still fit for purpose – except that all FRSs should consider mobilising two pumps to life risk fires in C risk areas (areas of mainly residential dwellings and/or light industry) instead of one as was required by the minimum standard.

FRSs themselves regularly reviewed the risks in their area against the descriptors of risk to ensure that their resources met the minimum standards.

In terms of outcomes, Figure 11 shows the steady decline in dwelling fire fatalities between 1984 and 2001 that was delivered by FRSs under the national standards of fire cover.

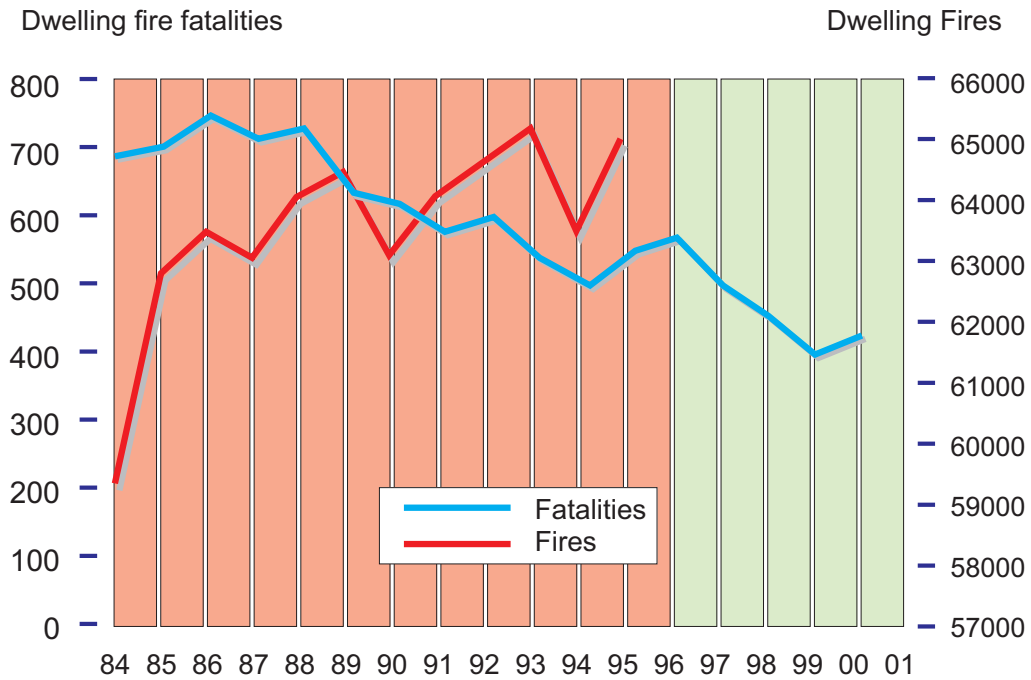


Figure 11: UK dwelling fire fatalities between 1984 and 2001

Graph copied from Safe as Houses report, additional data points from 1997 to 2001 taken from national statistics (The increase in dwelling fire numbers looks significant on the graph, but the scale starts at 57,000. The increase over 10 years was actually only 8%)

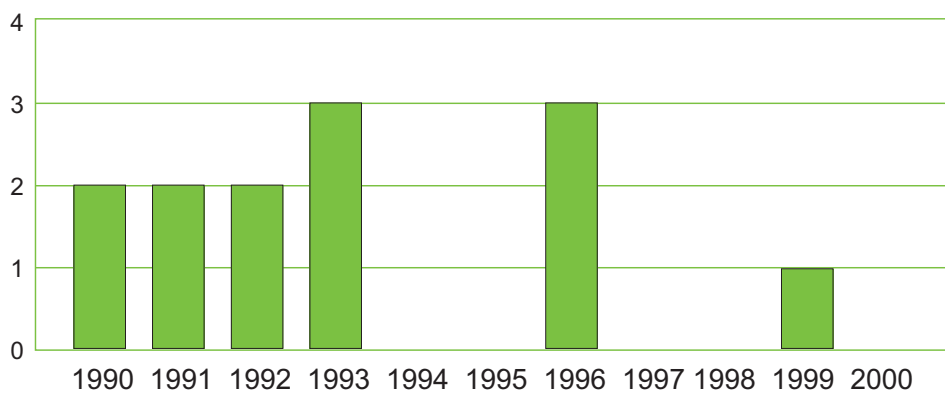


Figure 12: Fatalities in the course of duty, 1990-2000: Bain: 2002

It is also worthy of note that in his 2002 report, Bain commented on the reducing frequency of firefighter fatalities in the preceding 10 years (Figure 12).

Dwelling fire fatalities are only one limited indicator (although they are considered key by most), but it is clear that when national standards of fire cover were current, they were contributing to public safety, and were supporting firefighter safety.

Despite all this, national standards of fire cover were withdrawn through the Fire & Rescue Services Act 2004 and replaced with a process of integrated risk management planning (IRMP).

IRMP has replaced national standards of fire cover

When it was first introduced, the intention of IRMP was described in the English Fire and Rescue National Framework 2005/06 as setting out the FRA's strategy in collaboration with other agencies for:

- reducing the number and severity of fires, road traffic accidents and other emergency incidents occurring in the area for which it is responsible;
- reducing the severity of injuries in fires, road traffic accidents and other emergency incidents;
- reducing the commercial, economic and social

impact of fires and other emergency incidents;

- safeguarding the environment and heritage (both built and natural); and providing value for money.

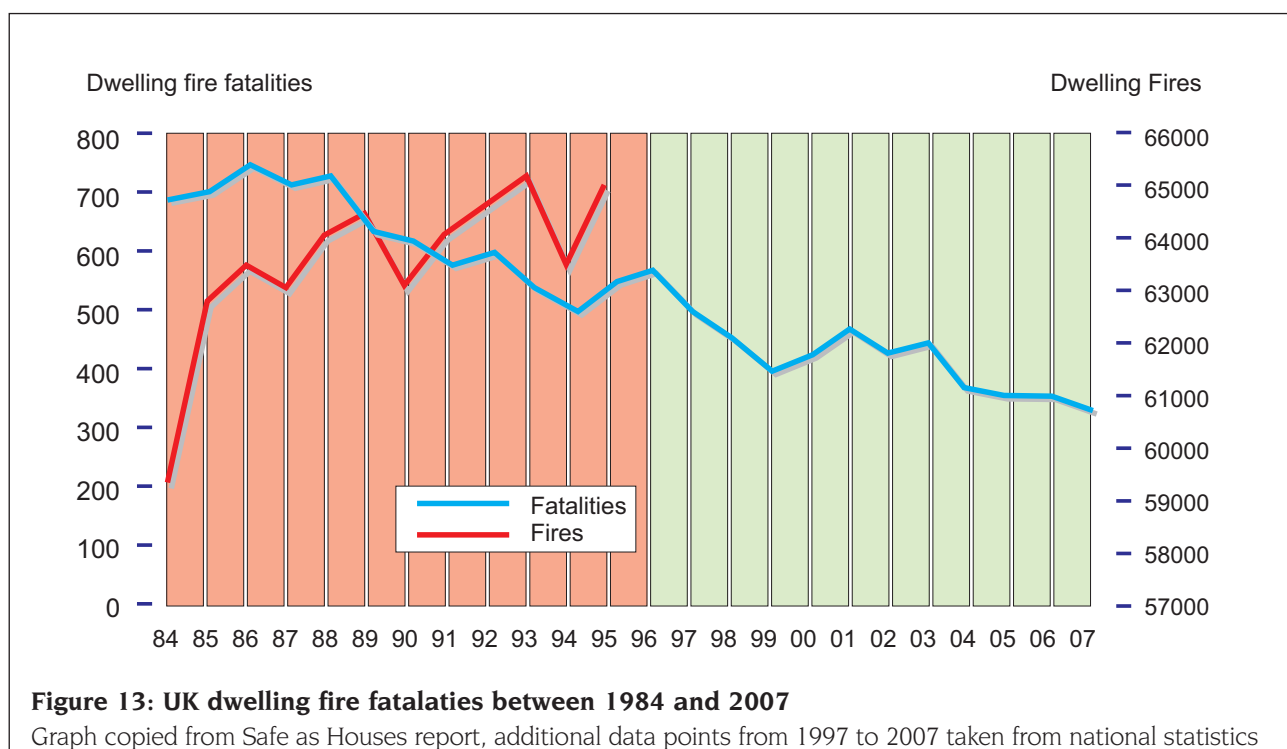
So the standard set for fire authorities was based on the level of service that had been developed over the years and had been achieved up to 2003. IRMP was then expected to improve every aspect of fire and rescue service activity beyond that level of service.

Performance challenge since the introduction of IRMP.

Fatalities

We can now extend the graph in Figure 11 to show dwelling fire fatalities since the introduction of IRMP (Figure 13).

It is true that dwelling fire fatalities today are lower than they have been since current records began, but it is clear that the performance of FRSs over recent years is no better than it has been at any time since 1984. This is in sharp contrast to the impression given by the Audit Commission's chosen method to represent recent FRS performance (through the number of primary fires, Figure 8 in this document, that was so heavily influenced by vehicle fires).



Cost of fire

According to Paragraph 19 of *Rising to the challenge*:

Fire cost the economy in England and Wales an estimated £7 billion in 2004. The largest cost is that of human casualties, property loss and business disruption – estimated at £2.5 billion.

In fact, if the cost of “human casualties, property loss and business disruption” was broken down, it would be seen that it is only the falling number of human

casualties that is keeping a lid on the reported cost of fire. Recent figures from the Association of British Insurers (ABI) have highlighted the rocketing cost of insured financial fire losses (Figure 14).

Once again, the Audit Commission fails to even mention this aspect of recent FRS performance, showing as it does a direct relationship between increases in so-called ‘efficiency savings’ in the FRS and spiralling fire losses that are eventually passed on to consumers through increased insurance premiums and consequent higher retail prices.



Firefighter fatalities

Today, we are also in a position to add more year's data to Bain's graph of firefighter fatalities (Figure 15).

Figure 15 shows quite clearly that there are serious questions to be asked about the workplace health and safety systems that have been provided for firefighters over recent years. This is yet another aspect of performance that the Audit Commission has decided not to correlate with their so called 'efficiency savings'.

Response times

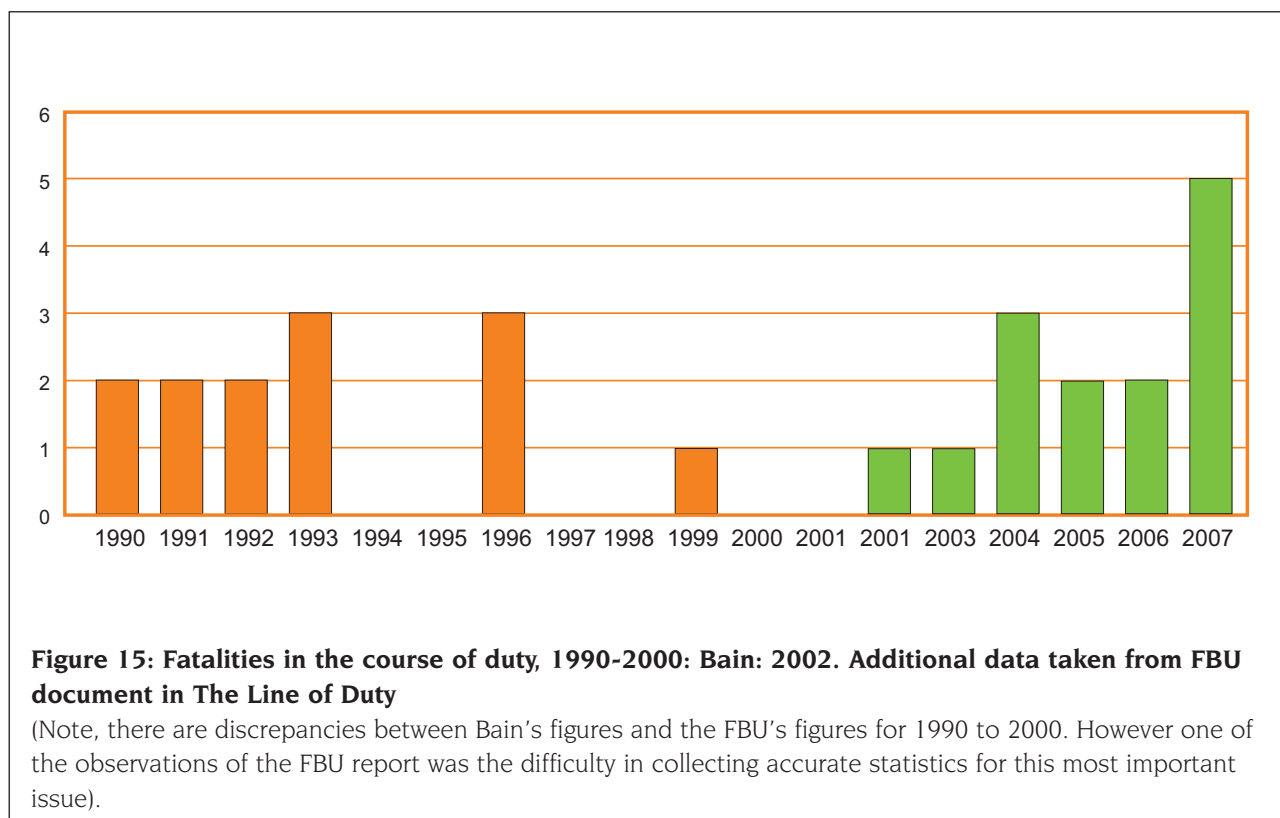
It might reasonably have been expected that under the heading 'The Performance Challenge', the Audit Commission might have asked:

- Why have the well established trend in fire fatalities been unaffected by the improvements in efficiency that they identified?;

- Why are fire losses rising out of control?;
- Why firefighter fatalities are at their highest level for 30 years?

The reason the Audit Commission doesn't ask these questions is because its definition of 'efficient' is what most people would call 'cheap'. It is only interested in the cost of the service. The commission has no interest in its value. Where data exists that shows that cost cutting has reduced the value of the service, the Audit Commission ignores it.

But the FBU is interested in improving the value of the FRS. The FBU is interested in the reasons behind the recent poor performance of the FRS in many areas. One factor that points to a reason for poor performance is the increase in average attendance times of fire appliances to incidents.



Response times are increasing with detrimental effect on financial loss and safety

Since 1998, average response times to dwelling fires in England have increased from 5.4 minutes to over 6.2 minutes. This is shown graphically in Figure 16, taken from a recent report by management consultants Greenstreet Berman.

The Greenstreet Berman report was published after *Rising to the challenge*, but the data on this important aspect of FRS performance was available to the Audit Commission, which chose to ignore it.

Greenstreet Berman claimed that increased attendance times have been caused by increased traffic congestion since 1998. This is patently wrong since, as their own graph shows, night time attendance times have increased just as much as daytime attendance times.

There can be little doubt that the removal of national minimum standards of fire cover is the primary cause of increased attendance times. The new IRMP process has been abused by FRSs, not supervised by FRAs and ignored by CLG. The assessment of community risk that is central to IRMP has been used as an excuse to downgrade and close fire stations, to take appliances off the run at nights and weekends to save money, and to make fire appliances unavailable for emergency calls while their crews deliver community fire safety.

The Greenstreet Berman report concludes that this has resulted in 13 additional fatalities in dwelling and other buildings fires each year, possibly 65 additional deaths in road traffic collisions (RTCs) and an £85m increase in other buildings fire damage. The insurance industry assesses the true cost of additional fire damage to be nearer £307m.

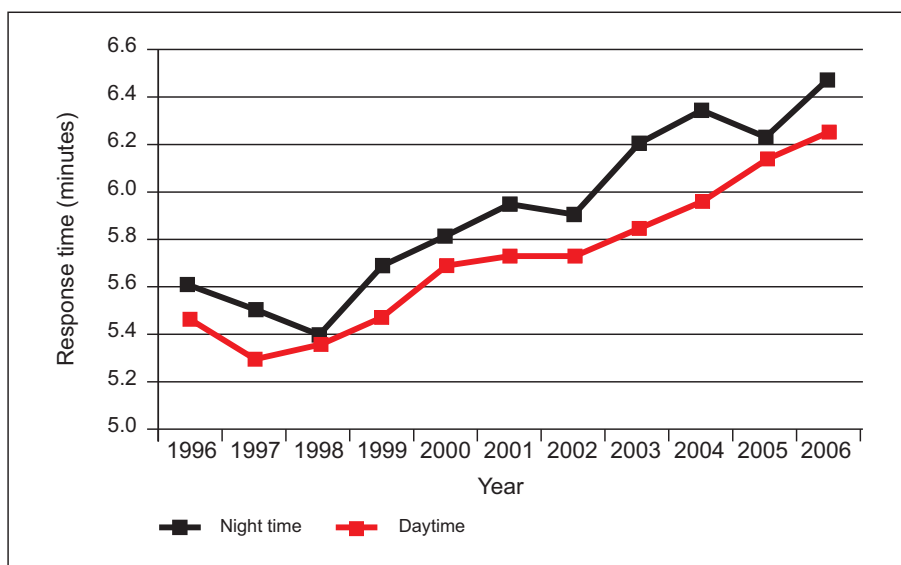


Figure 16: Day and night time dwelling fire response times (all English FRSs): Review of Fire and Rescue Service response times Fire Research Series 1/2009: Greenstreet Berman

The true performance challenge

FBU case study 2

With so many real challenges to FRS performance and areas where FRS performance is stagnating, why don't FRSs use the integrated risk management planning process to assess local needs and put in place measures to address them?

The objective of IRMP was always claimed to be to see the FRS provided by local councils more focused on the needs of local people. In practice though by:

- removing previous national standards of fire cover and;
- failing to set new 'baseline' national standards which a fire authority could not fall below within the IRMP process, together with;
- starving FRSs of necessary finance,

the government has shown that the autonomy given to FRSs was false.

By removing national standards and cutting finance, the government has forced fire authorities into making cuts in frontline cover without any accountability or responsibility being taken by central government departments or ministers.

Since 2002 the FBU has raised serious concerns that due to the set of drivers outlined above, there have been many occasions when the IRMP process has simply been used to 'window dress' financially driven cuts to frontline fire cover – disguised in the language of 'local needs for local people'. As finances continue to be squeezed this situation can only get worse with a continuing downward spiral of dangerous cuts being pursued with no recourse to any national baseline and with a government which has washed its hands of any involvement.

An example of this situation occurred within Cornwall FRS in 2007 and revolved around the proposal to end 24-hour Wholetime cover at the only two Wholetime shift stations in the county, Falmouth and Camborne.

As concern about these proposals grew, a question was asked in the House of Commons (Figure 17).

Fire Services: Cornwall

House of Commons – Written Answer

The following question was answered on 05 March 2007.

Question: Mr. Drew: To ask the Secretary of State for Communities and Local Government what assessment she has made of the adequacy of fire service cover in Cornwall; what discussions she has had with the Fire Brigades Union on this matter; and if she will make a statement. [125024]

Answer: Angela E. Smith: Fire and Rescue Authorities (FRAs) are required by the Fire and Rescue Service National Framework to have in place and maintain an Integrated Risk Management Plan (IRMP) which **reflects local need and sets out plans to tackle effectively both existing and potential risks to communities. The IRMP enables the authority to tailor cover to fire and other incidents to local circumstances—evaluating where risk is greatest and allocating resource accordingly.**

It is not the role of Ministers to intervene in the operational proposals of an authority's IRMP; that is for elected members of the authority concerned to determine following full consultation with the local community. The local authority is best placed to act on the professional advice of principal officers and to balance the competing local demands on available resources for the benefits of the communities they serve.

Figure 17

The Fire Minister was clear that the IRMP process is about effectively tackling risk in the local community. One thing the minister was equally clear about was that it was not a matter for her.

Compare the minister's answer with the stated purpose of the cuts as put forward openly by the CFO in a memo on 2 January (Figure 18).

From: M. Littmoden, Chief Fire Officer

Date: 2 January 2007

The County Council has a budget deficit for 2007/08 and therefore County Departments such as ours are expected to receive less as a base budget than we need to stand still in real terms. The forward budgets for the two years following 2007/08 do not alleviate this shortfall.

This situation has been with us for some time, this is why we started the freeze on whole-time recruitment, this freeze will have to continue. At the moment, as our personnel leave, watch strengths are being reduced.

As the freeze continues, we will reach a point where watch strengths cannot be reduced further if we want to maintain crewing levels on appliances. We have no option but to consider the ways in which our stations are crewed.

We therefore intend to include an item in our next IRMP regarding changing the status of Falmouth and Camborne to day crewed. This is so that we are being transparent about the effect of our forward budget and show how we intend to realign our spending with the projected available resources. We will be clear that any reduction in the whole-time strength is to be achieved through natural wastage.

Figure 18

The CFO was equally clear that the only reason for reducing watch strength, staffing levels and Wholetime night cover at Falmouth and Camborne was a budget deficit. It had nothing whatever to do with effectively tackling 'risk in the local community'. As he said: 'We are being transparent about the effect of our forward budget.'

This was unusual openness on the part of CFO Littmoden. Much more common is IRMP 'double talk' that causes cynicism and mistrust in this system. It is often the case that when you cut through the language of 'integrated risk management' and 'evaluating where risk is greatest and allocating resources for the benefit of the community', the reality is that the IRMP process is in place to ensure that the service can be cut to the bone without any come back on central government.

NOTE: *In the face of massive public, press and political concern following a large and fatal hotel fire in an area of Cornwall which did not have dedicated night cover, Cornwall County Council did not pursue these cuts.*

Summary

The number of fires and the number of injuries and deaths from fire experienced by the English public, is falling. These downward trends have been in existence for the last 25 years, so much of the credit for them must go to improvements in product design and lifestyle changes. The increasing emphasis that FRSs have placed on community fire safety (CFS) over the last decade has probably had a positive impact as well, but it is not possible to see or measure that effect in the headline statistics.

According to CLG figures, English firefighters attended 118,457 property fires in 2007. In 1997 they attended 164,476. So compared to today, firefighters attended 39% more property fires 10 years ago.

These downward trends have been used by some as an excuse to reduce the intervention capacity of FRSs, to move personnel out of operational posts into CFS and administrative roles, and to do away with operational posts, appliances and stations all together.

Central government has starved FRSs of the funds necessary to provide and maintain appropriate numbers of fire appliances and crews but, pointing to the IRMP process, they have denied responsibility and claimed that fire cover is determined locally. It clearly isn't.

The effect has been that while the probability of fire continues to fall, we see increased financial losses and needless deaths in fires and road accidents as appliances take longer to reach the scene of emergencies. Only 10 years ago, the day-to-day work of firefighters used to provide them with 39% more practical experience, 39% more opportunity to consolidate their safe systems of work. But the decline in practical experience has not been replaced with increases and improvements in operational training that would maintain their safety at the incidents they *do* attend. Instead it has been used for CFS and 'partnership working' schemes. It is no surprise then that firefighter injuries and fatalities are *increasing* despite the declining number of fires.

- **Why has the Audit Commission failed to fully report evidence of emergency activity?**
- **Why has the Audit Commission failed to report the correlation between response times and the impact on communities?**

The answers to these questions is clear. A truly efficient fire and rescue service would be one that delivers the best possible service to the public without endangering its employees and without unnecessary expenditure or waste – a safe service that delivers value for money.

But the Audit Commission's definition of efficiency does not even take value into account and only pays lip service to safety. The Audit Commission is simply interested in cheapness.

5 Working in partnership

Case study 5

Case study 5 considers fire and rescue services in the West Midlands region who are working together to share resources.

This is the kind of genuine efficiency that should be replicated throughout the country. However it would be interesting to know how the costs of shared resources are distributed. Are actual costs calculated and shared equally? Or is it assumed that things 'even themselves out' on a quid pro quo basis. If the latter, has the Audit Commission audited the process to ensure that one set of council tax payers is not losing out?

Also, given the size of the West Midlands Fire and Rescue Service, has the Audit Commission actually audited the collaborations to make sure that all partners are equal and are truly contributing to, and benefiting from, the collaboration?

While there is no evidence that it is the case, it is easy to imagine that when entering into 'partnership' with West Midlands Fire and Rescue Service, Hereford and Worcester and Shropshire Fire and Rescue Services might simply get the mechanisms of a large metropolitan fire brigade forced upon them. The Audit Commission, as an inspector of fire and rescue services on behalf of the public, should provide evidenced assurances that it is not the case.

Paragraph 92

Paragraph 92 says that there is a role for a national procurement strategy, but 'fire services should have the facility to procure collectively outside of national arrangements, if there is a good case for doing so'.

The reason for this statement is that local and regional collaboration on procurement has been found to be more cost effective than going through Firebuy, the national procurement body.

This route to cash savings in FRSs is in the hands of CLG. If CLG genuinely wants FRSs to be more efficient, then they must take heed of the advice of the Audit Commission and release FRSs from the requirement to follow the national procurement strategy.

Paragraph 97

Paragraph 97 and the preceding paragraphs describe a mutual insurance scheme, set up by a number of FRSs in order to deliver cash savings, but which had to be wound up because the legal powers of combined local authorities to operate an insurance mutual under Section 111 of the Local Government Act 1972 was called into question.

Central government controls legislation. If a section of this Act is preventing FRSs from making savings, what is central government doing to change the legislation?

Paragraph 101

Paragraph 101 discusses Regional Management Boards (RMBs), which are enforced collaborations between FRSs based on England's European Union regions (e.g. North West, East Midlands).

The report says that in some regions, RMBs have been made to work and are of value, while elsewhere collaboration would work without the 'confusing addition' of RMBs.

Where FRSs share common goals, there is no reason why they should not collaborate in order to achieve efficiency – whether their common goals exist because they are geographically close to one another (in the same EU region or not) or because they are socially and economically similar, but geographically remote.

RMBs are simply the fossilised remains of the aborted plan for elected English regional assemblies. The 'forced marriages' that they create between FRSs are clearly not all delivering co-operation, collaboration and efficiency.

FRS managers should be mature enough to collaborate with whosoever it is wise to collaborate with. CLG should allow FRSs to deliver genuine efficiency by taking the advice of the Audit Commission: 'Where there is no good business case for their continuation, RMBs should be dismantled.'

Paragraphs 102-105

Paragraph 102 starts off by saying: 'Collaboration is often made more difficult by complex governance and service delivery arrangements.' The report's Figure 31 (see Figure 19 below) shows the degree of complexity in graphical form. The paragraph finishes by saying: 'This

complexity makes it difficult to determine where responsibility and accountability lie, and where collaboration can best take place.'

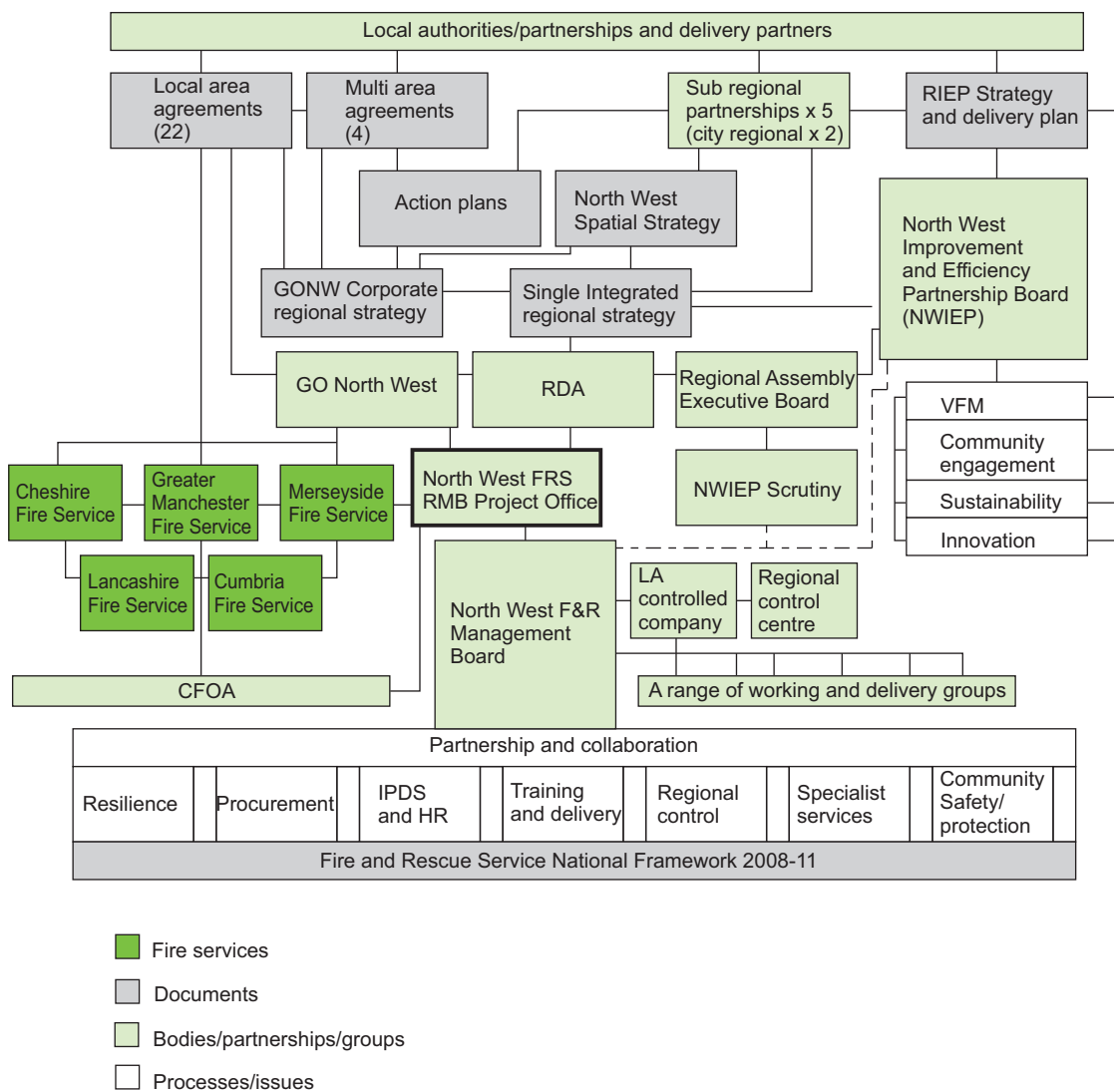
However, Paragraph 103 starts off by saying that: 'There is further scope for collaboration to generate improvement and saving.' And Paragraph 105 says: 'Despite the difficulties inherent in collaboration, fire services should consider a range of options...'

Paragraph 105 also contains the implied criticism that: 'At the moment working in collaboration is not

systematic within the fire service.' This comes as no surprise the report has already said in Paragraph 102 that: 'Collaboration is often made more difficult by complex governance...'

It is all very well to say that there are 'further scope' and 'more options' for collaboration, but what is to be done about the complex governance arrangements that are standing in the way? Once again, it is up to CLG to simplify governance arrangements if it genuinely wants FRSs to be more efficient through greater collaboration.

Many stakeholders are involved in governance and delivery arrangements for fire services



Source: Greater Manchester Fire and Rescue Service

Figure 19 (Audit Commission's Figure 31)

Collaboration with other agencies

Box 3: Benefits of partnership working

When discussing Paragraph 70 above, it was pointed out that according to the Audit Commission, the top 16 performing authorities include London, all the metropolitan authorities, and four of the largest non-metropolitan authorities in England. The Audit Commission rewards FRSs which are large and relatively well resourced.

In Box 3, several examples of partnership working are highlighted. They come from the following FRSs:

- Cheshire
- London
- Lincolnshire
- South Yorkshire
- Gloucestershire
- Greater Manchester
- West Midlands

Once again, four out of the seven FRSs are metropolitan authorities despite the fact that, including London, they number only seven out of 47 FRAs in England.

The partnership arrangement described in Lincolnshire is co-responding which should not be relevant in built-up areas where a well-resourced ambulance service should be able to provide a first-class medical emergency response rather than the first aid response provided by co-responding.

The example described in Gloucestershire is the Tri-Services emergency control that CLG is proposing to scrap under its regional control scheme. In describing the Tri-Services control, the Audit Commission says that 'it housed call centres for fire, police and ambulance emergency calls in one location'. The FBU wishes to point out that emergency service control rooms are not 'call centres'.

The example described in Greater Manchester is that: 'In the Salford area, GMFRS estimates firefighters could deliver just 4,500 HFSCs a year; with partner agencies it is aiming to deliver 33,700 in 2008/09.'

However, the delivery of HFSCs can be taken to extremes if it means that firefighters are out leafletting instead of being available for 999 calls. The Salford Advertiser story quoted above on case study 3 quoted a resident who said it was 'crazy' that the local firefighters had been tied up leafletting rather than rescuing a pensioner. Meanwhile there was a big warehouse fire where people lost their furniture.

Perhaps, instead of simply reproducing GMFRS statistics, the Audit Commission should have read the *Salford Advertiser*.

Paragraph 109

Paragraph 109 discusses Local Strategic Partnerships (LSPs) and Local Area Agreements (LAAs). Through the LAA process, LSPs select a number of targets from an available list. Paragraph 109 says that 'just two areas in the worst performing quartile for primary fires have chosen to include the primary fire target; while four areas in the best performing quartile have also chosen it'. The Audit Commission says: 'It is interesting to note that the number of fires does not seem to be the rationale for inclusion of these indicators as targets.'

The commission could also have noted that, while all FRSs will clearly continue to try to drive down primary fires, only two areas in the worst performing quartile will have the target focused additional help from local partners, while four areas in the best performing quartile will benefit from such help.

In Paragraph 65, the Audit Commission said: 'Although good overall, performance is extremely variable. Changes in primary fires since 1997/98 range from a 40% fall in West Midlands to a 1% rise in Humberside.' In theory at least, the inequitable selection of the primary fire target by LSPs should mean that in the future, performance will be even more variable. Will this be taken into account in the future when FRSs are audited per se and compared one against another?

Paragraph 111

Paragraph 111 discusses the contribution made by FRSs to partnership working. It says that 'all fire services that we spoke to said that their commitment to partnership working would not lead them to take on activity that had no benefit to the fire services themselves'. This may be the case, but how tenuous a link is permissible between 'activity' and 'benefit to the fire services'?

The phrase 'spare capacity' is used in Paragraph 111 to describe the resources committed by FRSs to partnership working. The FBU is fully supportive of intelligent and measured partnership working. It is wasteful of public money for different organisations to be undertaking the same activity, and simple co-ordination of activity can mean that the outcome is greater than the sum of the parts.

But the FBU is concerned about the term 'spare capacity'. The HSE has already issued improvement notices on two FRSs recently (one after the publication of the Audit Commission's report), and in the wake of increasing firefighter deaths and reportable injuries, the HSE visited a number of FRSs to inspect during 2009.

The FBU is of the view that the so-called 'spare capacity' in the FRS has been created by senior management, government at all levels and FRS auditors sidelining operational activity and operational training that is essential to maintain health and safety.

In order to address the concerns of the FBU and the HSE, it is likely that FRSs will be forced to recognise that much, if not all, of 'spare capacity' available for partnership working, is in fact time that must be spent ensuring that employees are trained to carry out their work safely.

Partnership working is to be encouraged, but the health and safety of staff must come first.

Paragraphs 112 and 113

Paragraph 112 says that FRSs could improve the 'strategic planning and performance management of their partnership working' and that 'in most of the fire services we visited there was no clear sense about why fire services were involved in all the partnerships they were'.

Paragraph 113 says: 'Three fire services we visited were involved in over 200 partnership initiatives... But none had systematically identified the costs and benefits of their involvement to determine when resources should be prioritised'.

While this is disappointing in its own right, it is equally disappointing that the Audit Commission does not mention that fault here lies in inadequate integrated risk management planning (IRMP). In fact, outside of the introduction and the glossary of terms, the acronym IRMP only appears in two paragraphs of the Audit Commission report.

An FRS enters into a 'partnership' to manage risk in the community it serves. That partnership must be integrated into other partnerships and activities undertaken by the FRS so that costs and benefits of involvement can be calculated and so that resources can be prioritised. Every partnership should be described in the FRS's IRMP – its costs, its goals and the way in which success will be measured.

There is little hope for improvement when the auditors of the fire and rescue service identify a problem, but are not aware that the solution already exists but is not being used.

Paragraph 114

In Paragraph 114, the report suggests what FRSs should do in order to expand their role in community partnerships. It says that they should:

- decide the extent to which they wish to engage in broader community work;
- engage and influence partners;
- prioritise their community work effectively; and
- if appropriate, divert efficiencies identified elsewhere in the report into their community work.

Apart from the fact that 'consult appropriately with informed stakeholders' has been omitted, the Audit Commission has described precisely the IRMP process without naming it.

6 Managing people

Equality and diversity

Paragraph 126

Paragraph 55 looked at the problems with recruitment and retention of RDS staff. While recognising that much more work needs to be done in this area, the Audit Commission report does not describe the additional cost associated with this to balance its table of 'cumulative efficiency savings available'.

In Paragraph 126, the Audit Commission does exactly the same when, on the subject of equality and diversity, it says that a firefighter survey for CLG 'found that only 45% felt that personal protective equipment being used by females had been designed to be suitable for females. Estates and premises strategies must take account of such equality and diversity requirements'.

There may or may not be cumulative efficiency savings available to FRSs, but the delivery of gender-specific PPE and separate changing facilities in fire stations will be a cost. Why is it that the Audit Commission feels that it is competent to project the capacity of the FRS to shed firefighter posts and save money, but unable to estimate the cost of delivering PPE and premises facilities that meet the requirements of a diverse workforce?

Sickness absence

Paragraph 137

Paragraph 137 makes the point that in 2000/01, 633 firefighters retired on the grounds of ill health, whereas in 2007/08, only 65 retired because of ill health. The report says that the most significant proportion of this fall in ill-health retirements occurred between 2004 and 2005 and 'was related to changes to the pension scheme in 2004'.

This is partly the case, but the Audit Commission does not point out that the changes in question meant that firefighters who were sick and injured were sacked without a pension instead of being allowed to retire – a change that has since been overturned by the courts.

Figure 38 of the report shows the proportion of retirements due to ill health during the years 2000/01 to 2008. The 633 firefighters who retired in 2000/01

were about 49% of retirees (therefore 1,292 in total), while the 65 firefighters who retired in 2008 were about 6.3% of the total retirees (therefore 1,032 in total). That is, there were 20% fewer retirees in total.

It is quite possible that this reflects a change in the age profile of firefighters since a large section of the workforce (who were recruited around 1973 when the service moved from three shifts to four) completed their 30 years' service during or soon after 2003. This change in age profile would undoubtedly have an effect on the health and fitness profile as well, and therefore would have a knock-on effect on ill-health retirements as well as retirements overall.

7 Meeting future challenges

Paragraph 143

Paragraph 143 discusses the FRSs' ability to deal with natural and human disasters. The paragraph ends by saying: 'Those [FRSs] who have improved efficiency retain the capability to respond to threats, as they do to the more traditional demands on them'. No evidence is provided and no documents are referred to in support of such sweeping and unjustified, statements.

Paragraph 144

Paragraph 144 talks about the difficulties experienced by those in the FRS who have faced opposition to 'change'. The paragraph ends by saying that: 'The common factor in making changes is strong leadership by FRA members and CFOs in taking difficult decisions and engaging with communities to explain those decisions.'

The Audit Commission does not explain how it concludes that there has been engagement with communities to explain decisions. One of the changes made by Greater Manchester FRS, named several times in the report as an example of notable practice, is that it takes fire appliances off the run at night, at weekends and on public holidays. It is soon to take appliances off the run during week days on a rotational basis around the city. However, if a member of the community of Manchester looks at the Greater Manchester FRS website, they are told that their local fire station has two fire appliances. They are not told that their local fire station has two fire appliances except at night, weekends and all day on Thursday when it only has one.

A member of the community who makes the effort to download the Greater Manchester FRS 2008/09 Action Plan will have to read page 29 out of 56 which states under the heading IRMP Actions 2007/8 Progress 'Reducing the impact' (cont.):

To ensure that the right resources are available throughout the day and into the evening, seven days a week, based on risk and demand, we will introduce more flexible employment contracts and duty systems for all our staff.

Is this really what the Audit Commission means by engaging with communities to explain decisions?

Paragraph 145

Continuing the theme of implementing 'change', Paragraph 145 says that the process requires strong management and a supportive infrastructure.

Change for the sake of change and detrimental change certainly require strong management and supportive infrastructure. The Audit Commission has just found out that FRSs are entering into partnerships that are uncoded, unplanned, not prioritised and ultimately not measured (Paragraph 113), but firefighters have recognised all this since such partnerships were initiated. Is it any wonder that they resist such changes and that strong management is required to force them through?

Implementing improvement may be achievable through strong management, but it is also achievable more efficiently and effectively through open and honest engagement between management and employees.

Paragraph 146

Paragraph 146 discusses the move from national to local determination of risk and response. The paragraph says that while it has been generally welcomed, some FRS managers have expressed concern that with local determination being 'the only game in town', those matters that *do* require a degree of cross border and national coordination are not being addressed properly.

This reflects an issue that has many consequences throughout the FRS.

While being a service of *local* government, FRSs regularly have to work together at a *national* level and they frequently carry out identical activities at the local level when faced with common *national* issues. And yet, because FRS is a local government service, CLG has almost washed its hands of the FRS. CLG does not give clear guidance even on national issues. Whilst the recent creation of the Operational Guidance Group is intended to resolve this, it still presents challenges on the ground. Again, the Audit Commission chooses not to propose a solution.

Fragmentation of training, equipment, standards and procedures is already making it difficult to work across FRS borders, and some FRS senior managers have already recognised this. Unless CLG quickly recognises that a national approach to national risks is required,

fragmentation will get worse, the FRS will become more of a post code lottery, and incidents requiring the involvement of more than one FRS will not be concluded satisfactorily.

Paragraph 152

Paragraph 152 is of great concern to the FBU. It addresses the issue of fire and rescue authority members overcoming 'barriers' when they attempt to close fire stations, cut firefighter posts, and otherwise cut services. The phrase that is so concerning is this:

Members need the right information to justify those decisions, and to engage with the community to explain decisions.

The point is that if authority members do not have the right information to *justify* decisions after they have been made, they cannot have had the right information to *make* the decisions in the first place.

But the Audit Commission does not say that members need the right information to *make* decisions, it specifically uses the word '*justify*'.

Could it be that the Audit Commission is suggesting that elected members should *make* decisions based on one set of criteria (for example finance), and then *justify* them on another set of criteria (for example 'modernisation').

This is not pedantry. In Paragraph 152 the Audit Commission has inadvertently highlighted a fundamental problem with FRA members knowledge of their role. There are many exceptions – many FRA members take their role very seriously indeed – but some make decisions based on nothing more than the advice of their Chief Fire Officer. They fail to apply any scrutiny whatsoever.

This is how the uncoded, unplanned, not prioritised and ultimately not measured activities of FRSs end up in IRMPs and as FRS policies. It is how fire station closures and service cuts are proposed even though they reduce public safety and increase the fear of fire. It is how members end up having to hunt around to find information to justify decisions after they have been made.

What is so worrying is that this practice is wrong. FRAs should not approve CFOs' proposals without seeing the information that justifies them, and scrutinising that information on behalf of the public. But quite

clearly this practice is so widespread that the Audit Commission believes it to be normal and thinks that a solution needs to be proposed.

Paragraph 154

Paragraph 154 continues the theme of overcoming 'barriers', this time in terms of FRS senior management. The conclusion of this paragraph is that 'managers may benefit from additional training and peer support to deal with this challenge'. Paragraph 155 also mentions 'improvements in performance management'.

These things would indeed be helpful, but not in order to force through change against the opposition of staff and the public. Rather, they would be helpful to prevent FRSs from getting 'involved in over 200 partnership initiatives' without identifying 'the costs and benefits of their involvement to determine when resources should be prioritised'. They would ensure that 'the right information' to justify proposals for change is gathered before those proposals are put to the FRA, not only in the event of the proposals being challenged.

Para 158

Paragraph 158 discusses Comprehensive Area Assessment (CAA) which 'will focus on the outcomes and the prospects for future improvement in and area and the contribution of partners.' It says that the Audit Commission will be 'interested in the contribution that the fire and rescue service is making to the partnership and how that is translating into improved local service outcomes'.

The paragraph then goes on to list some of the matters to be examined:

- engaging effectively with local communities to build up a comprehensive risk profile for the area;
- involving local communities in developing fire prevention and protection priorities;
- engaging effectively with partners that are engaged in civil contingency and local resilience;
- delivering any fire-specific priorities within the LAA; and
- contributing to broader local priorities, like tackling anti-social behaviour.

This is all well and good, but by necessity, and whether the Audit Commission likes it or not, the majority of FRS resources are still focused on the very dangerous activities of firefighting and rescue.

The Operational Assessment of Service Delivery has its faults, but it is intended to look at the suitability of FRS intervention capacity. As discussed above (Paragraph 111), the HSE is taking a greater interest in FRSs' ability to deliver its intervention capacity while still maintaining the health and safety of employees.

With resources becoming tighter and tighter, FRSs therefore have three 'auditors' examining their activity, each with different expectations.

Since the HSE is delivering health and safety (and can prosecute as a sanction, not just 'name and shame'), it would be wise for an FRS to prioritise the HSE inspection findings above the others. But is the Audit Commission interested in integrating its inspection regime with its 'partners'? Or will the Audit Commission still criticise FRSs who do not contribute to 'broader local priorities, like tackling anti-social behaviour', even if the reason for that failure is that they are bringing their health and safety systems up to a standard that is acceptable to the HSE?

Appendix A

Defining 'value for money' and 'efficiency savings'

On the face of it, delivering 'value for money' and making 'efficiency savings' in a public service are laudable objectives.

'Value for (public) money' is often described at conferences and seminars as 'getting more for less'. However, this description is misleading. 'Efficiency' does not mean 'getting more for less'. Efficiency actually has a strict physical meaning that is equally relevant to its financial meaning. Efficiency is the ratio of output to input:

$$\text{efficiency} = \frac{\text{output}}{\text{input}} \quad (\text{multiplied by } 100 \text{ to express as a percent})$$

It is true that getting more for less (increasing output and reducing input) represents an improvement in efficiency:

$$\text{efficiency} = \frac{6}{12} = 50\% \Rightarrow \text{efficiency} = \frac{8}{10} = 80\%$$

But efficiency can also be improved by increasing both output and input as long as the output increases by a greater proportion:

$$\text{efficiency} = \frac{6}{12} = 50\% \Rightarrow \text{efficiency} = \frac{10}{15} = 66\%$$

And efficiency can even be improved by reducing both output and input as long as the input reduces by a greater proportion:

$$\text{efficiency} = \frac{6}{12} = 50\% \Rightarrow \text{efficiency} = \frac{4}{6} = 66\%$$

By using apparently benign terms like 'value for money' and 'efficiency savings', and then inaccurately defining these terms as 'getting more for less', the concept of becoming financially 'efficient' is made to appear attractive.

However by failing to properly explain the full range of options for achieving 'efficiency', the average person finds it difficult to make a distinction between the positive routes to efficiency that increase output, and the negative route that reduces output.

The outputs (or outcomes to use the latest buzz word) of a fire and rescue service are lives saved, injuries prevented, fire damage reduced and humanitarian services delivered.

As a result, increasing efficiency in the fire and rescue service by reducing output but reducing the input by a greater proportion means reducing costs but saving fewer lives, preventing fewer injuries, allowing greater fire damage and delivering fewer humanitarian services.

And yet, by labelling this sort of process as 'making efficiency savings', it is perceived by many as being laudable, benign and attractive because 'making efficiency savings' has been linked in their mind with 'getting more for less'. In fact, it is none of these things.



Quite apart from anything else, it is contrary to the fundamental principles of Integrated Risk Management Planning. Integrated Risk Management Planning in England is a process of cost effectively reducing the risk to the community. English Fire and Resilience Guidance note 1 says:

The Government thinks that a modern and effective fire and rescue service should serve all sections of our society fairly and equitably by:

- a. *reducing the number of fires and other emergency incidents occurring;*
- b. *reducing loss of life in fires and accidents;*
- c. *reducing the number and severity of injuries in fires and other emergency incidents;*
- d. *reducing the commercial, economic and social impact of fires and other emergency incidents;*
- e. *safeguarding the environment and heritage (both built and natural), and*
- f. *providing value for money.*

According to English Fire Service Circular 25/2007, the IRMP definition endorsed by the IRMP Steering Group places emphasis on:

prevention and intervention activities to save and protect life and to reduce the economic and environmental impact of fire to the community. Through this partnership approach IRMP should deliver a proportionate response, that is evidenced based, which will ensure efficiency.



In summary, it is essential that the terms 'value for money' and 'efficiency savings' are looked at critically whenever they are used.

If one has fallen into the trap of believing that these terms mean 'getting more for less', then any such measures appear to be positive and arguing against them appears negative and destructive.

But sometimes measures can legitimately be called 'value for money' and 'efficiency savings', but they actually mean 'getting less for less'. Arguing against measures such as these is a perfectly responsible course of action to take.

