

Number	= risk number in the IRMP
O	= future challenges section in the IRMP
X	= general observations

Note about response from the Fire Brigades Union – a short document was received, as last year, from the FBU containing their *observations on* the Action Plan, rather than their *response to* the Action Plan. However, we have once again included their observations in our deliberations, and have treated them as if they were a response.

Cont rib.	Risk	Comment/Issue Raised	Proposed Response by NWFRA	
FBU	4	View that there is insufficient statistical information in the consultation document to provide evidence in support of the proposals, and that this statistical information should be made available for public scrutiny.	This issue was raised by the same consultee last year. Our response remains the same, namely that it is difficult to find the right balance between incorporating sufficient information without making the document overly complicated and difficult to read.	1.
FBU	X	Wish to see 'critical data sets' being incorporated into the consultation documents.		2.
RFU	4	Comment noting the absence of information in the IRMP relating to monitoring of turnout times.	This information will be published in other corporate publications together with a range of performance information.	3.
FBU	4	Concern that details of the new response standards have not been included. View that responding as quickly as possible is not a satisfactory standard for "a modern fire brigade" to use.	This issue was raised by the same consultee last year. The Authority has yet to develop its own set of service delivery standards in anticipation of the introduction of Assembly Government standards in 2006/07.	4.
FBU	5	View that data used to underpin the change to shift start and finish times at day crewed stations had become invalid at the point at which the change was introduced.	Although the actual numbers of fire calls fell during the course of 2004, the pattern of calls (i.e. the relative peaks and troughs) remained the same. The rationale for ensuring that staff on day crewed stations had not already finished their day shift when the busier time began was therefore just as valid at the end of 2004 as it had been prior to that.	5.

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RFU	2	Suggestion that FSEC work should be independently verified to check that decisions based on it are of high quality.	The Authority constantly strives to ensure that information used is of a high quality. We fully expect that the Audit Commission will ensure that the information upon which decisions are based is thoroughly and independently audited.	6.
RFU	7	Encouragement to make sure that data relating to deliberate and accidental ignition is correct so that decisions can be based on reliable information.	The Authority is committed to ensuring that its planning processes and decisions are based on robust and reliable information.	7.
RFU	0	Encouragement to ensure that planning in relation to sending a proportionate response to incidents sufficiently takes account of all applicable information.		8.
RFU	1	Wish to involve watch managers at stations more frequently in discussions on issues involving their local area.	Stations will have an increasing involvement through the new county-based structure and the development of station plans.	9.
RFU	8	Support for the management restructure in terms of greater devolvement to local level.		10.
RFU	8	Encouragement for Fire Authority Members to actively support local initiatives.	The Authority has a long record of Members becoming involved in local initiatives. It is not clear, therefore, to what these comments refer.	11.
RFU	0	Support for road safety initiatives, and encouragement to become involved in partnerships and community initiatives involved in improving road safety.		12.
RFU	6	Frustration at a perceived lack of information and insufficient involvement of staff in the IRM planning process. Suggestion that stakeholder groups be set up to widen involvement.	The Service has reviewed and is implementing a comprehensive Communications Strategy that will improve the flow of information across the Service.	13.

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FBU	6	View that the expertise of FBU members is being ignored, and that the Authority should be developing partnerships with the FBU itself with regard to new initiatives.	Frequent meetings are held with FBU representatives, giving ample opportunity to discuss how the union can contribute to the realisation of improvement plans. We value the expertise of our personnel, the majority of whom are FBU members. Furthermore, all employees, regardless of which union they belong to, are encouraged to participate fully in improving the Services we provide.	14.
FBU	6	Support for the authority's proposal to review the disposition of special appliances, and proposing that the FBU should be 'partners' in such a review.	For partnerships to succeed without being distracted by differences of understanding, all participants would, from the outset, need to commit to actively working towards a mutually agreed final outcome.	15.
FBU	7	Support for the authority's approach to arson reduction, and a wish for the FBU to become partners in the drive to tackle this issue.		16.
FBU	9	View that a feasibility study into a joint emergency services control room in North Wales should include the FBU.		17.
FBU	9	View that a review of the response to non-life-threatening incidents should include the FBU.		18.
FBU	X	Wish to see the FBU and the Authority committing to a partnership set up to eradicate fire deaths and promote employee safety.		19.
RFU	1	Expression of optimism for new county-based arrangements, but wish to ensure that County Managers have sufficient dialogue with stations.		New county-based arrangements have been in place since December 2004 and are already starting to show improvement in our ability to deliver local services.

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RFU	2	Dissatisfaction with the amount of information being disseminated on the progress and future use of the Fire Service Emergency Cover software (FSEC). Wish to have better communication regarding this.	As stated elsewhere in this response (item 13), the Service has already taken steps to develop an improved Communications Strategy that will enhance the flow of information across the whole organisation.	21.
RFU	3	Wish for better communication of the effect of reducing false alarms from automatic fire alarms, specifically in relation to how savings from these is re-distributed into additional preventive work.		22.
RFU	0	Wish to be privy to discussions about the cost implications of all options for control rooms (including maintaining current arrangements) in order to allow a proper assessment of the likely impact on budgets.		23.
FBU	X	View that the Authority has failed to "discharge the requirement" contained in ODPM guidance issued in 2004 "to undertake risk-based and evidenced response planning as part of the IRMP process".	This is an unsubstantiated comment that we do not accept.	24.
FBU	X	View that the ODPM's guidance advised the Authority that they 'may want to consider' setting an emergency attendance time to all dwelling fires of 8 minutes, this having been identified during research into fatality rates as being the 'optimum' attendance time to successful emergency intervention at dwelling fires.	<p>The Authority seeks to maintain a balance between prevention and intervention resources.</p> <p>The ODPM, in their response to comments received during the consultation on the IRMP guidance relating to the need for national standards to benchmark or underpin local standards, stated:</p> <p><i>"The risks faced by individual communities across the country vary considerably and we believe local managers are best placed to assess and manage them. Authorities will be responsible for determining and setting local policies and standards for prevention and intervention in the light of the risks faced by their local communities. No benchmark standards are proposed."</i></p>	25.

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FBU	1	Observation that NWF&RS has not adopted a target of zero fire deaths.	Several years ago, the Authority launched its revised set of corporate aims, one of which is to protect people from being killed or injured by fire and other hazards. We do not, therefore, propose to curtail those aspirations.	26.
FBU	1	References to UK National Fire Statistics reports providing a clear picture of the likely effect of reducing fire cover and/or increasing emergency attendance times to fires that start at night.	This response infers that UK national statistics reveal a causal link between fire deaths at night and emergency cover/attendance times. This has not been found to be the case locally.	27.
RFU	1	Request for more promotional materials and display equipment at local stations, and suggestion that more high profile marking of vehicles (& etc.) could help in raising the profile of the service generally.	We share the consultee's wish to raise the profile of the service, and will be considering this suggestion.	28.
FBU	1	View that CFS should be adequately resourced in order to be effective.	We agree.	29.
FBU	4	View that new fire cover arrangements should not be introduced without having tested them out first.	New arrangements are being integrated carefully. We do not see merit in running two systems simultaneously, and the suggestion that new arrangements are in some way experimental is misconceived. The fact that progress has been circumspect is evidence of the Authority's wish not to implement change recklessly.	30.
FBU	4	View that health and safety legislation should be the main building block for any IRMP.	We agree that health and safety legislation is important. However, compliance with a whole raft of legislation, including the Fire and Rescue Services Act 2004, is similarly brought in to the IRMP process.	31.

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FBU	X	Concern that issues of firefighter safety have not been included in the IRMP.	We do not share these concerns. Employee safety is an integral part of the organisation's everyday operations. Specific concerns regarding safety should be raised immediately through normal channels.	32.
FBU	5	Changes to shift start and finish times at the five day crewed stations had not been the subject of separate negotiation and agreement with the Fire Brigades Union.	The FBU were consulted on the draft IRMP last year, and referred to this particular proposal in their 'Observations' document.	33.
FBU	8	Endorsement for the way the Authority handled the recent service restructure, and the way it demonstrated a willingness not to attempt to impose change under the guise of an IRMP.	Changes are designed to improve public services, and we value the consultee's support for this.	34.
FBU	X	General view that the Authority has not used the full potential of the IRMP process to improve public safety.	The IRMP process is iterative , and year on year it will continue to build on the work that has now begun.	35.
RFU	2	Encouragement to continue with, and expand youth initiatives, including the YFA, and to seek out additional funding opportunities.	We share the consultee's wish to see these youth initiatives continuing to be developed.	36.
RFU	4	Concern at the efficiency of the communications hardware (specifically Control to alerters) used to mobilise firefighters on the retained duty system. Perception that it is slow and unreliable.	These comments will be considered along with other planned improvement activities.	37.
RFU	4	Encouragement for the Authority to use Geographical Information Systems (GIS) for mobilising resources to incidents.		38.
RFU	5	Encouragement for the Authority to use the Fire Service Emergency Cover (FSEC) software to improve service delivery.		39.
FBU	1	Support for utilising retained personnel to deliver CFS in North Wales.	The Authority is using a range of personnel as part of its overall CFS delivery strategy.	40.

Contrib.	Risk	Comment/Issue Raised	Proposed Response by NWFRA	
FBU	6	Concern that the IRMP fails to address the chronic problems of retained firefighter recruitment and retention in North Wales.	We share the wish to recruit more firefighters on the retained duty system in those areas where, and at those times when vacancies exist. Recruitment initiatives are an ongoing feature, and continue to be undertaken alongside the IRMP process.	41.
RFU	4	Encouragement for the Authority to tackle deficiencies in the numbers of firefighters employed on the retained duty system, including developing a more efficient system of replacing staff.		42.
RFU	X	Wish to ensure prosperity of firefighters on the retained duty system.	The Authority has a duty to provide effective, efficient and economic services to the public who pay for them.	43.
RFU	3	Encouragement to find ways to redress the effect of reduced financial remuneration for firefighters on the retained duty system due to fewer turnouts to false alarms from automatic fire alarms.	The terms and conditions of service of firefighters on the retained duty system were very recently re-negotiated at national level, and are therefore unlikely to change in the near future. As their pay is inextricably linked to their activity levels, the Authority is aware of the financial impact on firefighters who work the retained duty system of reducing the number of calls attended. As stated under Risk 5 of the IRMP, we are assessing the effectiveness of offering different types of contracts for firefighters to ensure that their income is not dependent on the number of calls they attend during their contracted working hours.	44.
RFU	3	View that the Authority has not been vociferous enough in acknowledging the contribution and continuing commitment of firefighters on the retained duty system whose income has been reduced in the wake of the reduction in callouts to false alarms from automatic fire alarms.		45.
RFU	4	Perceived inconsistency between the proposed relaxation of maximum turn-in times for firefighters on the retained duty system and the continuing expectation that those who already turn in within maximum times will carry on doing so.	The Authority remains committed to responding to fire and other emergencies which threaten life or property by the quickest means possible, using the most appropriate resources at its disposal.	46.
RFU	4	Suggestion that turnout times might be shortened if vehicles used by firefighters on the retained duty system to travel to the fire station were marked up in some way.	The Authority remains opposed to any measure that would increase the risk to staff or members of the public through the contravention of road traffic legislation.	47.

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Individual	6	Suggesting that savings could be made without compromising levels of service by using the second appliance at Wrexham as first attendance in a larger turnout area to any 'H' fires, small fires, chimney fires or special service calls. This would avoid calling in the retained crew.	This suggestion will be considered along with other planned improvement activities.	48.
FBU	X	Expectation that the 'year 2 IRMP' would have included proposals to improve the service's ability to save lives with an emergency response.	The second year action plan progresses the IRMP, and the valuable work of improving public safety.	49.
FBU	1	View that any proposal to shift resources from emergency response to prevention activity will put the public in those areas at increased risk.	This view is fundamentally at odds with current thinking and the changed role of the fire and rescue service nationally.	50.

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FBU	1	<p>Figures quoted from Year 2000 UK National Fire Statistics to illustrate that “most people die from fire during the early hours of the morning”, and that the public are more likely to die or be injured in a dwelling fire at night compared to a fire in the day.</p> <p>View that shifting emergency intervention resources to preventative work in the early hours of the morning would have fatal consequences for residents.</p>	<p>As stated in our response last year, the evidence does not bear this out in North Wales.</p> <p>Despite the fact that fewer incidents occur at night, and that there is a reduced requirement to undertake community fire safety work, the Authority has not chosen to reduce the number or size of crews or appliances on duty at night. Because of the increased overnight availability of firefighters on the retained duty system, the overall intervention cover at night is, therefore, slightly higher than during the day.</p> <p>As for the reference to the UK National Fire Statistics, we do not draw the same conclusions as those stated in the response. The UK statistics show, year on year, that across the UK the number of accidental dwelling fires rises between 4pm and 8pm, and peaks at around 5pm. The number of deliberate dwelling fires peaks somewhere between 7pm and 9pm. Overnight, the numbers fall.</p> <p>We agree that for those few calls received between midnight and 6am, the people involved will be more likely to be harmed. On average throughout the UK, 2 people are injured or killed in every 10 fires in dwellings. Between midnight and 6am this rises to 4 people in every 10 fires in dwellings. (These times refer to when the call was received, not when the death or injury occurred.) This calculation includes non-fatal injuries such as burns, falls, smoke inhalation, etc. as well as fatal injuries. So whilst the casualties-per-fire have been shown to be higher at night, the statistics do not relate to actual numbers of casualties.</p> <p>As for shifting intervention resources to preventative work during the early hours of the morning, we are not able to relate this to any proposal that we have ever put forward in either our first or second year of IRMP.</p>	51.

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FBU	1	View that effective IRMP lies in integrating preventative activity and emergency response capability.	We agree that the balance needs to be right to meet the demand for services that can reasonably be expected to be placed on the service.	52.
FBU	1	View that emergency intervention resources should not be reduced in order to increase preventative initiatives.	The Authority remains flexible in order to maintain a sensible balance of intervention and prevention services at all times. We remain committed to making the best use of using our resources to meet the needs and expectations of the local community.	53.
FBU	3	View that by requiring automatic alarm signals from some premises to be confirmed as being genuine calls to fire (not false activations), this will put members of the public at risk.	<p>For information, it is not the Authority's policy to insist that confirmation is received in each and every case before we mobilise in response to a signal from an automatic fire alarm. Control procedures for intelligent call management have been developed to ensure that calls are individually assessed to determine the most appropriate response.</p> <p>We are convinced that the risk balance is far better when it is weighted in favour of remaining available to respond to real emergencies. In recent years, false alarm signals from automatic fire alarms have resulted in about 3,000 unwanted call-outs every year to non-existent fires in North Wales. That means that on average fire appliances and crews have been unavailable 8 times a day to respond to real incidents. Furthermore, the cost of turning out to these types of occurrences has had to be met by the Authority, which is a particularly onerous drain on resources.</p>	54.

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FBU	3	Support for Authority's view that false alarms from AFAs can in fact be reduced " by positive intervention and expansion of NWFRS Call Management Systems".	This same comment was received and acknowledged last year.	55.
FBU	3	Strong rejection of any proposal "to request members of the public to seek out fires" [<i>this relates to requesting confirmation from someone on the premises where an automatic fire alarm has been set off that there is, in fact, a fire that requires the fire and rescue service to attend</i>].	This point was raised by the same consultee last year, the inference being that the Authority is somehow setting out to get ordinary members of the public to take on a new and dangerous role. Nothing could be further from the truth. As we have stated on numerous occasions, we are convinced by the argument that turning out to places where we are <i>not</i> needed puts people at far greater risk in those places where we are genuinely needed. Over-provision in order to do both simultaneously would be unsustainable and not something that could be regarded as a sensible approach. We have confidence that procedures conducted in our Control will differentiate between the genuine and the false, and, where there is doubt, we will err on the side of caution.	56.
FBU	3	View that any refusal to respond effectively to calls actuated by automatic fire alarms would increase casualty rates and property damage.	The Authority will always give an effective response to calls. Making a professional judgement as to whether that should involve turning out with fire appliances will form part of that response.	57.

Contrib.	Risk	Comment/Issue Raised	Proposed Response by NWFRA	
FBU	4	View that Integrated Risk Management Planning should be based around a goal of being able to totally eradicate all deaths attributed to fire.	<p>The underlying sentiment is laudable, but we see it as a much broader issue than that.</p> <p>The use of the word 'integrated' clearly conveys the wish to manage down risk from a wide range of hazards, one of which is fire. Road traffic accidents, chemical spillages, flooding – just a few of the non-fire risks that we deal with from day to day.</p> <p>Similarly, we do not wish to concentrate solely on reducing the number of deaths, without simultaneously seeking to reduce the number and severity of injuries.</p>	58.
FBU	4	View that the two main factors in being able to save lives at emergency incidents are speed and weight of response.	<p>The Authority maintains that the foremost means of saving lives is through prevention.</p> <p>Whilst the two factors presented are indeed important when responding to emergency incidents, we see it as a more complex picture that incorporates such other elements as arriving safely in the right location with the correct equipment and being able to continue to support a properly trained and motivated workforce throughout the incident.</p>	59.

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FBU	9	Opposition to the concept of co-responding, on the basis that response by the Fire and Rescue Service to other emergency calls would be impaired.	Co-responding is clearly part of a national strategy for increased joint working between authorities which recognises the advantages to public safety. It forms part of the Assembly Government's overall aspirations for the fire and rescue service in Wales. As in the case of being able to respond to non-fire emergencies without detracting from the ability to respond to fires, this will be subject to careful planning. Furthermore, if false alarms can be managed out, crews would be available instead to respond to this sort of life-threatening emergency.	60.
RFU	0	Disappointment at the perceived slow pace of introducing co-responding. View that current plans to trial the system in some areas of North Wales do not go far enough, and that individual members of staff are personally committed to its implementation, even if the group that represents them is not.	We share the consultee's enthusiasm for new initiatives that will improve public safety. However, we also have a responsibility to ensure that any such initiative is well planned and effective.	61.
FBU	9	Wish to retain a stand-alone fire and rescue service control room for North Wales.	The financial burden of retaining a stand-alone fire and rescue control room that complies with additional resilience and inter-operability requirements would necessarily drain resources from other parts of the Service. By looking to co-locate with other emergency services in North Wales, we are seeking to find a practical solution that retains this function in the local area.	62.
RFU	1	Concern that employing non-operational staff to deliver Community Fire Safety was implemented without consultation with either the Retained Firefighters Union or with watch managers on individual retained stations.	This proposal was presented in the original IRMP document.	63.

Contrib.	Risk	Comment/Issue Raised	Proposed Response by NWFR	
RFU	5	Suggestion that discussions about service delivery arrangements and adherent costs could be conducted by a joint consultative committee.	This comment has been noted.	64.
FBU	X	Concern that using the IRMP process in place of collective bargaining procedures may sour relationships between the FBU and the Authority.	Given the FBU's declared support for improving the Service and totally eradicating all deaths from fire, we would hope that we can continue to work together harmoniously.	65.

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