



# BUDGET SUBMISSION

HM Treasury

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## Introduction

This is the Fire Brigades Union (FBU) submission to the Westminster government's consultation on the Budget, based on guidance issued on 22 August 2017. The FBU is the democratic, professional voice of firefighters and other workers within fire and rescue services across the UK. We represent the vast majority of wholetime (full-time) and retained (part-time, on-call) operational firefighters and control staff in the UK.

The FBU makes our submission in the aftermath of the Grenfell fire on 14 June 2017, one of the most appalling tragedies of modern times. This is the worst fire in terms of fire deaths within living memory in the UK. As the public inquiry opened on 14 September 2017, police have said **80 people** are dead or presumed dead following the incident. The death toll may rise. Firefighters stand in solidarity with the people affected and will do everything to help the community recover after this terrible fire.

## Failure to assess risks

The FBU believes that central government failures to assess national risks and the costs of fire contributed to this tragedy. The Cabinet Office's National Risk Register of Civil Emergencies (2015) only highlighted wildfire as a significant, high-priority risk. Nowhere does the Westminster government appear to have understood the risks to homes, schools, hospitals, hotels and other buildings from new and existing materials such as cladding. Despite frequent warnings by the FBU and some others in the fire industry, politicians at Westminster have failed strategically as leading decision takers.

The Fire and Rescue Services Act 2004, Fire Safety Order 2005 and similar legislation in the devolved administrations created a 'risk based' approach, but this has not improved fire safety as intended. Local risk management plans have become justifications for resource cuts, and worst case scenario planning sidelined. There are no longer overarching standards and research bodies to assess fire trends and new technologies for fire risk. National standards of fire cover have been replaced by a postcode lottery of local attendance targets, with average appliance response times slowing over many years.<sup>1</sup>

There is similar neglect in other areas where firefighters intervene to help their communities. The risks from climate change are well founded and the occurrence of major flooding incidents in recent years requires a coordinated, fully funded response from central government. This has prompted devolved governments in Scotland, Northern Ireland and Wales to implement a statutory duty on their fire and rescue services to respond to flooding, and to provide some additional resources to

respond effectively. Yet the Westminster government has resisted introducing such a duty for fire and rescue services in England.

Central government has failed to provide the resources necessary for national resilience. For too long, local fire and rescue authorities have been denuded of the resources to carry out proper risk assessments. Central government has abrogated its responsibility for national resilience, leading to the catastrophe at Grenfell. Subsequent testing has shown that this fire could have happened in many other parts of the country. The Communities Secretary stated at Westminster on 5 September that 165 of the 173 social housing buildings over 18 metres tall and clad with some form of aluminium composite material had failed fire safety tests.

## **Failure to assess the costs of fire**

Central government has also failed to properly quantify the costs of fire, despite the evident impact of fire and other hazards on economic growth, business balance sheets and the wider economy. The economic costs of fire are no longer published by the Westminster government. The Department for Communities and Local Government (DCLG) last reported on the cost of fire in England for 2008, putting the total estimate at £8.3bn per year. At that time, the cost to the economy of a single fire death was £1.65m and the estimated average consequential cost of a domestic fire £44,523. In simple cost/benefit terms, the fire and rescue service saves the economy billions of pounds every year and merits further investment.<sup>2</sup>

There are good reasons to believe that at least some costs have risen since 2008. The Association of British Insurers (ABI) has indicated that the UK could stand to lose as much as £10bn as a result of commercial and industrial fires by 2020. The financial and economic impacts of blazes in warehouses without sprinkler systems in England and Wales add up to over £1bn over the last five years. These warehouse fires cause a direct financial loss to business of £230m per year, £190m per year in productivity and impacts to the supply chain, approximately 1,000 jobs lost through disruption and business failure and £160m in tax receipts lost to the Treasury over five years.<sup>3</sup>

Annual UK fire and rescue service expenditure is approximately £2.7bn – a little over 0.1% of central government expenditure on public services.<sup>4</sup> This equates to less than £50 for every man, woman and child in the UK per year – extraordinary value for money considering the wide range of protection offered and activities firefighters undertake. The FBU therefore believes that the service meets the Treasury tests for value for money, effectiveness and the mitigation of sectoral, distributional and environmental impacts.

## **Fire risks**

Since the turn of the century, the number of fires and fire deaths across the UK has reduced significantly. These improvements reflect important long term industrial changes in domestic and business premises across the UK. It also reflects long term social changes, such as fewer people smoking.

The FBU would particularly highlight the activities of firefighters as crucial to these changes. The union has fought for increased regulation – such as the furniture regulations – to ensure a common national framework for fire safety. The FBU has long been a strident voice for fire prevention activity by firefighters, in recognition that inspection, enforcement, advice and other activities such as fitting smoke alarms help make our communities safer. But none of these activities are a substitute for emergency intervention.

Sadly, fewer fires and fire deaths have been used as an excuse by some politicians as showing a “reduction in demand” for the fire and rescue service. But it is precisely the role of the fire and rescue service to reduce the number of fires and emergencies where possible and to reduce their impact if they do happen. The ‘product’ of a fire and rescue service is safer communities. The improving statistics show that the fire and rescue service is more productive than it has ever been in the past. There is no sense in making cuts to a productive industry.

There are also some signs that these improvements have slowed and may have reached a **plateau**. Official government figures suggest that for the past four or five years, the numbers of fire throughout the UK has stayed broadly the same. The FBU believes that cuts to the fire and rescue service have hampered the work firefighters do in preventing fires and protecting vulnerable people.

Home Office figures show that the total number of fires attended by fire and rescue services in England decreased from the beginning of this century. There were 162,000 fires in England between April 2016 and March 2017, the latest period for which figures are available. Since 2012/13 the total number of fires in England has been **broadly stable**, flat-lining over the last four years. Of those fires in 2016/17, almost half were primary fires. Primary fires are more serious fires that harm people or cause damage to property.<sup>5</sup>

Similarly, in Scotland over the last four years, the total number of fires has remained fairly similar at around 26,000 fires across the country. Approximately 40% of fires in Scotland were primary fires. These have also remained stable for the last four years.<sup>6</sup> In 2016-17 firefighters in Wales attended nearly 11,000 fires. Nearly 5,000 were primary fires, a figure that has been stable for the past five years.<sup>7</sup> In the last five years, Northern Ireland firefighters attended approximately 3,200 major fires each year, virtually unchanged over that period.<sup>8</sup>

## Non-fire incidents

Firefighters provide an all-hazards emergency service, tackling a wide range of emergencies as well as fires, including, floods, road traffic incidents, chemical hazards, terrorist incidents, animal rescue and other matters.

In England over the past two years, the number of non-fire incidents attended by firefighters has increased significantly to 174,000 in 2016/17. This was a 14% increase compared with the previous year and 30% higher compared with five years ago. This increase reflects more medical co-responding incidents attended, the result of trials organised by the FBU and fire employers through the National Joint Council. Around two-thirds of the additional 21,000 non-fire incidents were categorised as medical incidents.<sup>9</sup>

In Scotland, firefighters attended almost 13,000 non-fire incidents in 2015-16, over two thousand more than the previous year and higher than previously published figures.<sup>10</sup> Over the last five years firefighters in Wales attended on average just over 9,000 incidents per year. However in 2016-17, firefighters responded to over 11,000 non-fire incidents.<sup>11</sup> Last year, Northern Ireland firefighters attended over 2,900 special service calls (including road traffic collisions), approximately 25% more than the volume of incidents over the last five years.<sup>12</sup>

## Rescues

The Grenfell Tower fire underlined the importance of emergency intervention by firefighters. On 14 June 2017, the first crews arrived on scene in under six minutes. At the height of the incident, 60

appliances and 250 firefighters attended the fire. The London Fire Brigade has said that 65 people were rescued by firefighters.

Firefighters are carrying out record levels of rescues, underlining the irreplaceable role of emergency intervention. Although the Westminster government does not publish rescue figures, the FBU obtains them from local fire and rescue services to illustrate the value of firefighters work. Over 41,000 people were rescued by firefighters in the UK between April 2015 and March 2016, the latest figures available. These rescues equate to over 3,400 rescues a month, or over **100 rescues** every day.

In England, over 34,000 people were rescued by firefighters between April 2015 and March 2016. Almost 2,000 rescues took place in Wales, whilst there were over 1,500 rescues in Northern Ireland. The Scottish fire and rescue service rescued over 3,500 people overall. For the UK as a whole, over 37,000 rescues were carried out at non-fire incidents in 2016-17, the highest figure since the FBU began collecting this data. Almost 4,000 people were rescued at fires by firefighters over the year.<sup>13</sup>

## Enforcement of fire safety regulation

Fire safety regulation is an irreplaceable part of the regime for keeping our communities safe. However the FBU has major concerns about the regulations governing fire safety inspection and enforcement. Current building regulations in England are ambiguous about fire safety matters on cladding and insufficient on sprinklers. Fire risk assessors do not have to be properly qualified. The fire and rescue service no longer enforces fire safety to the same extent it did in the past.

Serious questions have been asked about fire safety regulation in light of the Grenfell Tower fire and subsequent investigation of other buildings. Yet the FBU is aware that both the number of fire safety inspectors and the number of inspections have fallen significantly in recent years.

There has been a significant decline in the capacity of fire authorities to undertake fire prevention activities. Home Office figures show that since 2010, home fire safety checks in England have **fallen by 25%**, whether measured by the number of visits or the hours spent on checks. This is not about targeting vulnerable people, which is the common excuse given for the decline. It is matter of having fewer firefighters available to carry out this irreplaceable work.

In England, the fire and rescue service has legal responsibility for fire safety audits under the Fire Safety Order 2005 and other legislation. These inspections involve comprehensive assessments of compliance with the law and may result in prohibition notices or even prosecutions. However Home Office figures also show that these have fallen by around a **quarter** in England since 2010-11. Similarly, fire safety audits in purpose built flats with four storeys or more fell by 12% over the same period.<sup>14</sup>

Since 2010-11 fire safety audits carried out by the Scottish fire and rescue service have fallen by 9% over seven years.<sup>15</sup> In Wales, fire safety audits were 42% down over six years.<sup>16</sup> During 2016-17, NIFRS carried out around 1,800 fire safety audits in non-residential premises under fire safety legislation. This was half the number of audits compared to the previous year.<sup>17</sup>

To enforce fire safety legislation, there is a specialist body of firefighters to carry out inspections and where necessary, gather evidence of breaches in the law. These are the professionals who carry out safety audits and check that landlords and business are complying with the law. Yet the FBU has obtained evidence that the number of specialist fire safety inspectors has fallen significantly over a number of years.

The FBU estimates that **over a quarter (28%)** of specialist fire safety officers have been lost since 2010 across the UK as a whole. We estimate that in the last five years, 13% of fire safety inspectors have been lost. These figures are even worse than the general cuts in firefighter numbers over this period.<sup>18</sup>

## Cuts and firefighter jobs

Since 2010, the Westminster government has systematically cut central funding to fire and rescue services across the UK. The National Audit Office report, *Financial sustainability of fire and rescue services*, found that between 2011 and 2015, **over 30% of central funding was cut** from fire and rescue services in England.

Local government settlement figures show that planned central funding for fire and rescue services in England will be **cut by 20%** over the 2016-20 period. Funding for devolved administrations has also been cut, with impacts on fire and rescue services there.

These cuts mean:

- More than 40 fire stations closed across the UK
- Dozens of fire engines axed
- 999 emergency response times at the slowest level in 20 years
- Reductions in night time emergency cover
- Introduction of unsafe, ill-equipped “fire vans” to replace fire engines
- Crews reduced from 5 to 3 (or 2)
- Delays in arrival of support crews
- Failure to implement safe policies on relief of crews at fires and other emergencies
- Firefighters increasingly required to enter fires in breathing apparatus multiple times
- Specialist fire engines – such as high reach appliances – only available by removing other appliances from availability (‘jump crewing’ or ‘double jumping’).

Last year, nearly **1,300 frontline firefighter** jobs were cut. Firefighter jobs were reduced by almost 3%, damaging our essential emergency service. Over **1,000 jobs** lost last year were wholetime (full-time) firefighter jobs, with predominately urban fire and rescue services such as London, Greater Manchester, West Midlands and West Yorkshire hit hardest. This is the seventh successive year that firefighter numbers have been slashed across the UK.

Since 2010, over **11,000** frontline firefighter jobs have been cut, almost **one-in-five (19%)** of the total firefighting force over this period. Over **one thousand** firefighter jobs have been cut in Scotland since 2010. In Wales nearly 300 jobs have gone. Although the FBU is aware of some recruitment in some brigades since these figures were recorded, the squeeze on jobs also continues unabated.

Over 70% of those cuts are to wholetime firefighters, while nearly 3,000 retained firefighters have also been cut. More than a **quarter** of control staff have been lost. Every brigade has suffered – metropolitan, combined and county services – in all parts of the UK and under all devolved administrations, although not to the same degree.

Cuts to firefighter jobs, including a recruitment freeze in many brigades (along with the abolition of the equality and diversity strategy for England), has made the battle for a more diverse and representative workforce much harder. Just 5% of operational firefighters are women and 4% from an ethnic minority background.<sup>19</sup> Equality and diversity has been entirely ignored at Westminster, by senior civil servants and others within the fire and rescue service. This needs tackling across the UK.

## Firefighters' pay

Firefighters' basic pay increases have been lower than the median pay settlement for the whole economy since 2007. Firefighters' awards were lower than average public sector pay settlements between 2006 and 2010, and thereafter broadly in line with public sector settlements.

In real terms, adjusted for CPI inflation, firefighters' pay increases were negative throughout most of the last decade, except for the last two years when CPI inflation was exceptionally low. With CPI inflation at 3% again, firefighters' real living standards are again under threat.

**Firefighters' basic pay increase versus CPI inflation, 2004-2016**

Year	Firefighters' basic pay increase %	CPI
2007	2.4	2.5
2008	2.5	3.3
2009	1.3	2.2
2010	0.0	3.4
2011	0.0	4.5
2012	1.0	2.8
2013	1.0	2.7
2014	1.0	1.5
2015	1.0	0.1
2016	1.0	0.3

The result is that firefighters now earn approximately £3,000 less in real terms (10%) than they did on 2010, even if the CPI measure of inflation is used. The FBU wants the Westminster government to fund any firefighters' pay increase negotiated between our union and fire employers. Firefighters cannot survive on praise alone: paying firefighters a decent wage is not too much to expect in light of the irreplaceable work done in recent years.

## Other fiscal matters

The FBU would like to raise two other matters relevant to the Budget.

First, the FBU cannot understand why the Westminster government has refused to exempt the Scottish Fire and Rescue Service from value added tax (VAT) – despite repeated demands from the Scottish Government and politicians of all persuasions. We cannot see why VAT rules apply uniquely to Scotland, while the rest of the UK is exempt. The Scottish Fire and Rescue Service's annual VAT bill is around £10 million, which would pay for an additional 337 firefighters, according to the Scottish Parliament Information Centre (SPICe). The FBU therefore urges the Treasury to think again and eliminate this anomaly, which would free up valuable resources for the fire and rescue service in Scotland.

Second, the FBU is aware that firefighters in an officer role or rank who utilise either lease or provided cars are facing detrimental changes to their tax arrangements arising from recent changes in legislation and HMRC regulations. In short, these changes will result in affected members no longer being able to deduct business mileage from their taxable benefit. These changes were quite unexpected and notification of the impact of the change has only recently been made by HMRC. These changes have a drastic and detrimental effect on our officer members, who are required to undertake some aspects of their work in their own vehicles. The FBU wants HMRC to amend its changes to ensure fire officers are exempt from these provisions.

## Recommendations

1. The fire and rescue service has suffered unprecedented cuts to central and local funding in the last decade. The FBU wants investment, not cuts to the service going forward. In the aftermath of the appalling loss of life at Grenfell Tower, there must be an immediate halt to any further cuts
2. The reduction of firefighter numbers is now below resilient levels for normal and major incidents, putting public and firefighter safety at risk. The FBU wants a new generation of firefighters recruited to complement the existing professional workforce.
3. The equality agenda in the fire and rescue service has stalled. The FBU wants governments to instigate and implement a new equality and diversity strategy, developed in consultation with key stakeholders, and which includes recruitment targets, reporting and training to tackle sexism, racism, homophobia and under-representation within the service.
4. Fire station closures and fewer pumping appliances damage the service to the public. The FBU wants a moratorium on reduced crewing levels on pumping appliances, and on fire station closures. We want national standards for appliances and equipment, to cut down on waste and duplication, and to enhance cross-border cooperation.
5. The FBU wants consistent national standards, including a minimum five minute emergency response standard for higher-risk areas, and steps to improve response times to all calls. There should be a key target for all fire services to improve their emergency response times in relation to attendance and number of appliances.
6. The absence of central guidance and oversight of integrated risk management planning (IRMPs) has led to the fragmentation of the fire and rescue service. Local Resilience Forums are not functioning as they should. The FBU wants risks and resilience to be assessed nationally as well as locally, to guarantee standards are maintained and improved.
7. The UK faces increased risks and uncertainty, now and in the future from climate change, the ageing population and the housing crisis, as well as other hazards and threats. The need for an effective emergency response capability will increase with these risks. The FBU wants a national risk assessment that includes fire and rescue service capability to plan for and respond to any emergency now and going forward.
8. Firefighters have the right to expect high standards of pay and good conditions of work. We have the right to decent quality pensions which reflect the nature of the work we do. Firefighters expect employers and governments to engage constructively with our elected representatives at local and national level and through agreed collective bargaining arrangements. Governments must respect the professionals.
9. The FBU expects the Treasury to examine fiscal anomalies with respect to VAT in Scotland and for firefighters using their own vehicles, to ensure that these penalties are eliminated.

## References

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- <sup>1</sup> Home Office, Fire incidents response times, 19 January 2017
- <sup>2</sup> DCLG, The Economic Cost of Fire: Estimates for 2008. Fire Research Report, 3/2011
- <sup>3</sup> Centre for Economic and Business Research, Economic Cost of Warehouse Fires, January 2014
- <sup>4</sup> CIPFA, Fire and Rescue Service Statistics, July 2017
- <sup>5</sup> Home Office, Fire and Rescue Incident Statistics: England, April 2016 to March 2017, (10 August 2017)
- <sup>6</sup> Scottish Fire and Rescue Service, Fire and Rescue Statistics in Scotland (Incident data) 2015-16, (18 October 2016)
- <sup>7</sup> Welsh Government, Fire and rescue incident statistics 2016-17, (31 August 2017)
- <sup>8</sup> Northern Ireland Fire & Rescue Service (NIFRS), Annual Report and Statement of Accounts for the year ended 31 March 2017, (3 July 2017)
- <sup>9</sup> Home Office, Fire and Rescue Incident Statistics: England, April 2016 to March 2017, (10 August 2017)
- <sup>10</sup> Scottish Fire and Rescue Service, Fire and Rescue Statistics in Scotland (Incident data) 2015-16, (18 October 2016)
- <sup>11</sup> Welsh Government, Fire and rescue incident statistics 2016-17, (31 August 2017)
- <sup>12</sup> Northern Ireland Fire & Rescue Service (NIFRS), Annual Report and Statement of Accounts for the year ended 31 March 2017, (3 July 2017)
- <sup>13</sup> FBU, Freedom of Information requests, July-September 2017
- <sup>14</sup> Home Office, Fires in purpose-built flats, England, April 2009 to March 2017: An ad hoc statistical release, (27 June 2017)
- <sup>15</sup> Scottish fire and rescue service, Fire Safety and Organisational Statistics (Scotland) 2016-17, (31 August 2017)
- <sup>16</sup> Welsh Government, Operational activities: Audit activity by audit outcome and financial year, (22 September 2016)
- <sup>17</sup> NIFRS, Annual Report and Statement of Accounts for the year ended 31 March 2017, (3 July 2017)
- <sup>18</sup> FBU, Freedom of Information requests, July-September 2017
- <sup>19</sup> Home Office, Workforce and workforce diversity tables, (29 June 2016)