

**FBU response to:**

***The future of the fire and rescue service in  
England***

Fire Brigades Union submission to Lyn Brown MP, Shadow Minister,  
Communities and Local Government

27 February 2015



## BACKGROUND

The Fire Brigades Union welcomes the opportunity to discuss the future of the fire and rescue service in England with the shadow fire minister Lyn Brown and Labour's shadow ministers for the Department for Communities and Local Government (DCLG). As the primary representative of the workforce, the union believes our members have a decisive stake in the future of the fire and rescue service, as well as a duty of candour with all politicians about its direction.

The FBU also welcomes the announcements made by Lyn Brown at the Fire Sector Summit in November 2014, particularly Labour's support for a statutory duty on flooding; its opposition to privatisation of the fire and rescue service; and its promise to scrap police and crime commissioners. The union also welcomes Labour's pledge to offer a more coordinated approach and consult with all stakeholders within the fire and rescue service.

### Austerity cuts

However if Labour's review is to make progress, the FBU believes a number of crucial matters need to be clarified. The first problem is the context of further cuts. The first year of the new government after the May 2015 general election will see an unprecedented level of central funding cuts of 8.8%, in addition to the 21.5% cuts over the last four years. This kind of financial noose is quite simply the worst environment in which to discuss the reorganisation of the fire and rescue service. Short term spending reductions may preclude a rational, longer term reorganisation, which would benefit the public that need the service and the firefighters who provide it.

### Efficiency

A second problem is with the lack of clarity on efficiency. Ken Knight's review (2013) said that efficiency 'does not just mean doing the same for less, nor is it just about one-off cashable savings. It is an entire approach to service delivery, achieving the best possible service for the public'.<sup>1</sup> This is not a definition of efficiency, nor does it define the boundaries of 'possibility'. If this is within current financial constraints, then it will not be about 'achieving the best possible service for the public' as cheaply as possible, but about finding ways to provide some sort of service as cheaply as it is possible to get away with. Efficiency requires accurate data on the cost of fire and other incidents to the economy, yet DCLG has failed to publish accurate or reliable data on the cost of fire and other activities attended by the fire and rescue service.

Knight claimed that 'increasing the use of on-call staff by just 10% could [save] up to £123 million per year'.<sup>2</sup> This was the largest 'efficiency saving' proposed in his report – but in reality it is neither efficient nor a saving at all. The FBU represents the majority of retained firefighters in the UK, and it is a misnomer to regard them as 'on-call', since this implies a permanent and continuous availability that simply does not exist. Retained firefighters do an outstanding job in providing fire cover for communities throughout the UK. However a number of significant problems arise from replacing wholetime firefighters with retained posts.

In fact the unit cost of providing the same fire cover by retained firefighters as wholetime firefighters will be the same, if not slightly more expensive on the retained side. The only way the arithmetic can be made to save money is by **reducing fire cover** to the public – in other words having fewer firefighters available in case of emergency. But this is not efficient either. Retained firefighters,

---

<sup>1</sup> Ken Knight, *Facing the future: findings from the review of efficiencies and operations in fire and rescue authorities in England*, 17 May 2013: 11

<https://www.gov.uk/government/publications/facing-the-future>

<sup>2</sup> Knight 2013: 31-2

because they are mostly mobilised from home and then have to get to their fire station, are necessarily slower to respond than firefighters already on station and ready to attend. Therefore replacing wholetime firefighters with retained firefighters will slow response times significantly, putting lives at risk and leading to greater property losses and environmental damage. Similarly, there are a host of activities that wholetime firefighters can undertake between calls, including community fire safety, their own fitness and training, which could be jeopardised if such a substitution took place. Such so-called 'efficiency savings' displace some costs, only to stack them up elsewhere. This is not efficiency – and must be borne in mind with any restructuring proposals.

This lack of clarity on efficiency is not new. Under the last Labour government, the Audit Commission published its own review of fire service efficiency, without defining what it meant by the term. However its examples included reducing the number of wholetime firefighters required to cover shifts; day crewing; reduced night cover; and replacing second pumps with targeted response vehicles, all of which diminish the service to the public.<sup>3</sup> Efficiency is often assumed to mean 'getting more for less', but the relations between inputs and outputs is never that simple. The 'outputs' of the fire and rescue service are lives saved, injuries prevented, property damage reduced and humanitarian aid delivered. (These are recognised by the insurance industry, who thereby save on payouts). In DCLG's cost of fire model, fire prevention, regulation and emergency response are seen as costs with no added value by way of cost reductions elsewhere or benefits to particular stakeholders, homeowners and businesses. Instead perversely, improvements such as fewer fires and fire deaths are presented as 'reduced demand' and used as a justification for further cuts.

The FBU understands that Labour shadow ministers have a different conception of efficiency. We note that Labour's zero-based review for DCLG states that major efficiencies in local service delivery lie in the direction of merged or integrated activities: 'reducing layers of complexity so that fewer people are involved in decisions and the delivery of frontline activity; increasing responsiveness and so meeting needs more effectively first time; and sharing senior managers and resources'.<sup>4</sup> However we believe that the estimate of 7.5%-10% savings per year (£63m-£84m) from fewer fire authorities is optimistic and may have adverse implications for frontline firefighters, if it is based on comparison with the Scottish model.

## Resilience

A third problem lies with the meaning of 'resilience'. The FBU fully embraces the importance of resilience, when ordinarily defined as the ability of agencies (including the fire and rescue service) to 'bounce back' in the face of adversity and to remain robust under duress. The union fully accepts the broadening of the role of the fire and rescue service to include major incidents, ranging from major flooding, terrorism, outbreaks of disease, major transport and industrial accidents, and other threats identified on the National Risk Register.<sup>5</sup> We believe firefighters have a role to play in all phases of the disaster cycle, from response to recovery, mitigation and preparedness, and in a wide range of emergencies, from known risks to uncertain events and society's so-called 'wicked problems'.

However 'resilience' emerged as a catch-all term from the civil contingencies review at the turn of century. It reflects a response to events at the time, particularly to what was called the four 'Fs': the fuel protests, foot and mouth disease, flooding and the firefighters' pay strikes. The Cabinet Office

---

<sup>3</sup> Audit Commission, *Rising to the Challenge: Improving fire service efficiency*, December 2008: 88  
<http://archive.audit-commission.gov.uk/auditcommission/sitecollectiondocuments/AuditCommissionReports/NationalStudies/RisingToTheChallenge17Dec08R EP.pdf>

<sup>4</sup> Labour Party, Third interim report: A New Deal for Communities and Local Government, 11 December 2014: 5, 7-85  
[http://www.yourbritain.org.uk/uploads/editor/files/CLG\\_ZBR\\_Interim\\_Report\\_No.3.pdf](http://www.yourbritain.org.uk/uploads/editor/files/CLG_ZBR_Interim_Report_No.3.pdf)

<sup>5</sup> Cabinet Office, National Risk Register of Civil Emergencies, 2013 edition  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/211867/NationalRiskRegister2013\\_amended.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/211867/NationalRiskRegister2013_amended.pdf)

defines resilience as ‘the capacity of an individual, community or system to adapt in order to sustain an acceptable level of function, structure and identity’.<sup>6</sup> This definition is taken from a pamphlet by Demos, the think-tank once closely associated with New Labour.<sup>7</sup> We believe there is a crucial change of emphasis in this approach – crudely to shift responsibility for managing risk away from the central state administration onto individuals and their communities.

This individuation of responsibility, usually clothed in the rhetoric of empowering local people, in reality tends to dismiss collective responses as outdated, to ignore the causes of macro changes (including poverty and inequality), facilitates the enhanced role of market mechanisms and the private sector, while at the same time acting as a ploy to efface austerity. Resilience appears ubiquitous, while central government absconds from its role as protector of the general interest. The FBU regards this shift as a neoliberal, laissez faire approach that diminishes the role of the central state and undermines genuine resilience.

### Democratic accountability

Fire and rescue service governance has to grapple with both national resilience and democratic accountability. The service was a patchwork until the Second World War, with 1,440 separate fire authorities in England and Wales, and 228 in Scotland. It was nationalised because of the Blitz, before becoming a universal but locally-run service after the war. After the Fire Services Act 1947, there were 147 public fire brigades. The Northern Ireland Fire Authority (created in 1950) was amalgamated with the Belfast Fire Brigade in 1973 into a single Fire Authority for Northern Ireland. As a result of the reorganisation of local government in 1973-74, the number of brigades in England and Wales was reduced from 128 to 55 and 11 to 8 in Scotland.<sup>8</sup> Wales reduced to three brigades in 1996. Devolution of the fire and rescue service took place over a decade ago. The single Scottish Fire and Rescue Service came into being in April 2013. There are currently 46 brigades in England.

The FBU has no blanket attitude to mergers and reorganisation: rather each proposal is evaluated on its merits – principally the likely impact on public safety and on firefighters. The union supported the rationalisation of brigades after the Second World War. The FBU welcomed the Holroyd report and did not oppose reorganisation in 1973-74. The union supported the merger of eight brigades into the single service in Scotland. It did not oppose the proposed merger of East and West Sussex. The FBU made full submissions to the consultations about the mergers of Devon and Somerset and of Dorset and Wiltshire Fire Services. The union raised concerns about the financial motivation behind the proposals, the potential loss of democratic accountability and demanded reassurances that any combination would not adversely affect fire cover.

The principal argument in favour of the status quo is the closer connection between local fire and rescue services and local representatives who oversee them. The issue of democratic accountability was central to the post-war settlement, when fire and rescue services returned to local government control after wartime nationalisation, but with overarching national standards to ensure resilience and cross border interoperability. Democratic accountability is important to the FBU, not least because far worse and undemocratic modes of governance are currently in circulation. The FBU is opposed to the Mayor's Office for Policing and Crime (MOPAC) model, proposed by the mayor of London for the fire and rescue service in the capital. This consists of an unelected coterie running public services under the aegis of an elected mayor. The union agrees with Lord Stevens' critique of the police and crime commissioner (PCC) model as fundamentally flawed. We also reject the Scottish

---

<sup>6</sup> Cabinet Office, Strategic National Framework on Community Resilience, March 2011: 4  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/60922/Strategic-National-Framework-on-Community-Resilience\\_0.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/60922/Strategic-National-Framework-on-Community-Resilience_0.pdf)

<sup>7</sup> Charlie Edwards, Resilient Nation, Demos, 2009: 18

<sup>8</sup> Home Office, Review of Fire Policy, 1980; Holroyd Report on the Fire Service, 1970

fire and rescue service model of governance by quango. Having a committee of elected representatives, even if they are not directly elected to a fire authority, is more democratic than one elected mayor who then appoints his/her cronies or co-thinkers to ‘manage’ the service. This approach hollows out important democratic processes of oversight, while encouraging corruption.

However the FBU does not exaggerate the virtues of the status quo. Councillors and others elected to one body then sit on a fire authority by virtue of party political proportionality. There is no role for the elected members of representative bodies of the workforce in this system, nor is there particular representation for local communities. The direct election of members of fire authorities/boards might address some of these concerns and would have few additional overhead costs if run at the same time as regular council elections.

### The current regime

The current governance model was established by the Fire and Rescue Services Act 2004, although it has been significantly modified by the coalition government since 2010. The 2004 Act ripped up established national standards of fire cover, removed minimum establishment levels of staffing, scrapped the central body tasked with producing operational guidance, the Central Fire Brigades Advisory Council (CFBAC) and abolished the inspectorate. None of these changes were warranted and none have stood the test of ten years’ experience.

Without national attendance standards, there has been a slowdown of response times, even when measured by the first appliance. Behind that is an unquantified decline in ridership, meaning fewer firefighters arrive early at incidents, and slower responses of second and further appliances. The last DCLG annual response times report found that average response times to dwelling fires in England slowed over the past decade from 6.1 minutes in 2003-04 to a peak of 7.4 minutes in 2013-14. Although dwelling fire response times for a first appliance appear unchanged in the last four years, they are still a long way from the norm when there were national standards. The average response time to dwelling fires in England is now almost **two minutes slower** than two decades ago. Response times to other building fires, including workplaces and businesses have also slowed.<sup>9</sup>

Without strict establishment levels, the fire and rescue service has lost over 5,000 firefighters in the last decade. The picture is worse if the decade is divided in two. The number of wholetime firefighters fell between 2005 and 2009, and the decline has accelerated since 2010. Retained firefighters rose until 2010, but have been reduced since. Similarly, control staff grew until 2010, followed by a precipitous drop. Most of all, support staff proliferated until 2010 and although they too have faced cuts, this has not been on the same scale as frontline firefighters. Ironically, there are still more support staff in 2014 compared to 2005, while more than one in nine frontline firefighter jobs have been cut.<sup>10</sup>

Table 1: Number of firefighters in England, 2005-14

England	2005	2009	2010	2014
WT	31,053	30,242	29,880	26,289
RDS	13,543	14,268	14,425	13,177
Control	1,520	1,633	1,592	1,307
<b>FF</b>	<b>46,116</b>	<b>46,143</b>	<b>45,896</b>	<b>40,773</b>
Support	7,837	9,398	9,757	8,026

<sup>9</sup> DCLG, Fire incidents response times: England 2013-14, 7 August 2014  
<https://www.gov.uk/government/statistics/fire-incidents-response-times-england-2013-to-2014>

<sup>10</sup> DCLG, Operational Statistics Bulletin 2014  
<https://www.gov.uk/government/statistics/fire-and-rescue-authorities-operational-statistics-bulletin-for-england-2013-to-2014>

Table 2: Changes to numbers of firefighters in England, 2005-14

England	2005-14	%	2005-09	%	2010-14	%
WT	-4,764	-15.3%	-811	-2.6%	-3,591	-12.0%
RDS	-366	-2.7%	725	5.4%	-1,248	-8.7%
Control	-214	-14.0%	113	7.4%	-285	-17.9%
<b>FF</b>	<b>-5,344</b>	<b>-11.6%</b>	<b>27</b>	<b>0.1%</b>	<b>-5,124</b>	<b>-11.2%</b>
Support	189	2.4%	1,561	19.9%	-1,731	-17.7%

The abolition of CFBAC has led to the stagnation of guidance. The Practitioners Forum was supposed to act as a substitute, but it has hardly met since 2010. The replacement of an inspectorate by the Audit Commission and now peer review – unique to the public sector – has meant fire and rescue services have only a very light touch oversight from the part-time and under-resourced chief fire and rescue advisor. The coalition government’s policy, in which DCLG has effectively washed its hands of responsibility for the fire and rescue service as a whole, has not been a policy of positive localism but rather a retreat into laissez faire negative individualism. This has hugely fragmented the fire and rescue service in England, given rise to unplanned, topographically incoherent and risky ad-hoc projects, the pursuit of fads and empire building by chief officers and a sense that the service has been diminished, disregarded and ultimately primed for transmogrification. The status quo – business as usual – is not sustainable: that needs to be the beginning of wisdom for the next government.

## THE OPTIONS FOR POTENTIAL REORGANISATION OF THE FRS IN ENGLAND

### A. Locally-determined mergers

*This option would encourage local mergers between neighbouring Fire and Rescue Services on a locally-determined ad-hoc basis.*

This is the business-as-usual option and for the FBU, the worst of those on offer. In the first place, bottom-up mergers are taking place (or under discussion) because of austerity cuts, which is the wrong driver for the structural transformation of the fire and rescue service. At the very least, mergers require some transitional investment to ensure that the upfront costs of merger do not overwhelm current budgets, before any efficiency savings can come through.

However the coalition government has not only cut the fire and rescue service savagely over the last five years. It has also provided some funding and political encouragement for ad-hoc mergers and collaboration, both between different fire and rescue services, and between a fire and rescue service and other emergency responders. This has led to an unplanned, in places chaotic situation, which threatens resilience at every level.

The problem is well illustrated by what has happened in **controls** since the FiReControl project was scrapped in 2010. Control rooms have been closed in Suffolk, Isle of Wight and Cumbria. Staff in the control room in West Sussex have been transferred to East Sussex, while in the North West, the regional control room in Warrington (incorporating Greater Manchester, Lancashire, Cheshire and Cumbria) has gone live. Staffordshire control has closed, with calls taken by West Midlands. This amounts to a 15% reduction in control rooms in just four years. After the Scottish fire and rescue service was formed in April 2013, plans have been made to close five control rooms. The Mid & West Wales fire and rescue authority plan to close Carmarthen fire control room, while Somerset and Dorset controls are also threatened. New mobilising systems have failed repeatedly, mobilising times have increased, staffing and supervision levels are below safety critical levels and this has led to a deterioration in control performance.

There is little recent experience of mergers in the fire and rescue service. The merger of Devon and Somerset fire and rescue services in April 2007 is the most significant in England over the last decade. The first point to make is that the merger has not staved off austerity cuts in the combined service. Between 2007 and 2014, 94 wholetime firefighters and 13 firefighter control jobs have been cut, some 19% of wholetime jobs and a quarter (25%) of control jobs. Retained jobs over that period have increased by 10, less than 1% of retained jobs.

Breaking down the figures is instructive. The job cuts have largely been since 2010. Some 90% of wholetime job losses in Devon and Somerset have taken place since 2010. Both retained and control jobs rose up to 2010, but have both fallen since then. The hardest hit has been middle managers, with a third or more of all roles from station manager and above being cut. Therefore although the merger itself did not immediately lead to job cuts, over the period some 7% of all wholetime, retained and control jobs have been cut. This compares with around 10% across England as a whole over the same period. Therefore local mergers are not a panacea for fending off cuts and job losses in the fire and rescue service.<sup>11</sup>

### 1. What do you think are the barriers to achieving both change and efficiency savings?

The main barriers to the merger of two fire and rescue services into one could be:

- Political control of the respective fire authorities
- Different council tax precepts
- Different governance structures e.g. one county; another combined
- Chief fire officers – egos and empires-built (or desired)
- Different risk profiles of the merging fire and rescue services.

The main barriers to efficiency savings arising from such a merger could be:

- Transitional costs in terms of time and money to make the merger work
- The extent of previous empire-building by chief fire officers – i.e. proliferation of backroom jobs of limited utility.

The FBU should also be candid. One of the perceived ‘barriers’ to unacceptable ‘change’ and the drive for cuts is the FBU. The overwhelming majority of firefighters across the UK are voluntarily and willingly represented by the FBU and are quite clear: we will not accept cuts to fire cover or cuts to firefighter jobs, however these are dressed up.

### 2. Do you believe this option would achieve resilience across England?

Locally-determined mergers do not necessarily achieve resilience across England. Piecemeal mergers undertaken without regard to the knock-on effects for other brigades and for national risks will not be more resilient. In the absence of national standards, national risk assessment, common training and equipment, such mergers may hinder rather than improve resilience nationally – and paradoxically because of the importance of cross-border assistance, even locally as well.

### 3. To what extent do you think this option would achieve the required efficiency savings?

Locally-determined mergers are unlikely to achieve substantial ‘efficiency savings’. Some small gains from economies of scale (e.g. from rationalising back office functions HR, training, fire safety) would

---

<sup>11</sup> DCLG, Operational Statistics Bulletin 2014; CIPFA, Fire Statistics 2007, 201

be rapidly exhausted with further rounds of austerity cuts. They may also be eaten away by pay hikes for principal officers or through the expansion of chief officer 'empire-building' projects.

#### 4. What do you think are the operational opportunities of this option?

Operationally, the locally-merged brigades would no longer require cross border arrangement with each other. In principle, harmonisation of standard operating procedures, training, working practices, crewing levels and safety could level up – but only if firefighters' representatives (the FBU) are closely involved.

#### 5. What do you think are the operational risks of this option?

There are large operational risks if the locally-merged option continues under austerity. Fewer firefighters attending with slower response times means some large fires will spread, putting lives and property at risk. Firefighter safety is also jeopardised if the right resources are not available at the right time and in the right place. The operational risks of continued fragmentation have been ignored for a decade – these issues need to be brought back to central stage.

A single control room following a locally-merged fire and rescue service would lose vital local knowledge and experience. The example of the new North West control room, which has mobilised fire appliances from different parts of the region for long distances because of lack of familiarity with a larger geographical landscape, could be replicated. A single control room would have greater volume and reduced back-up in spate conditions if other mergers replicate the patchwork arrangement. Harmonising policies might lead to two cultures fighting each other.

#### 6. What do you think are the resilience opportunities of this option?

Under the locally-merged option, at best the resilience of the two fire and rescue services could be consistent and improved upon if managed properly. But in the absence of national standards for attendance times and resources, resilience could not be truly realised, IRMP's would continue to be used to justify budgetary savings instead of delivering operational cover and resilience based on risk.

In addition, the local model of 'bottom-up' mergers driven by arbitrary 'top-down' DCLG funding also carries with it the threat of other structural changes. In Cleveland, the drive to create a mutual is widely understood as a wedge for privatisation. This is the reason why the Cabinet Office has promoted the proposal – sadly with the support of some Labour councillors locally. Some 97% of firefighters surveyed by YouGov in 2013 said they opposed mutualisation. The experience of mutualisation, foisted on health workers and others, indicate that this model is not appropriate for the fire and rescue service. Similarly, the increased use of private providers, such as SGI in Surrey, to undertake firefighting roles (including flooding) is another attempted wedge for privatisation.

#### 7. What do you think are the resilience risks of this option?

The fire and rescue service attends emergency incidents of many sizes and of many causes; some of which hit the headlines, many of which do not. If resilience means very large incidents, i.e. incidents that are intended to cause terror and incidents that could potentially embarrass the government, then for the fire and rescue service, they are still regarded as operational incidents. The resilience opportunities and risks are therefore the same as the operational opportunities and risks.

8. Beyond efficiency savings, what do you think are the benefits of this option? (Please comment on resources, training, national planning, control centres, capacity, operational performance, or anything else you feel is important.)

With the locally-merged option, there are few additional benefits and there may be costs in terms of a disruptive transition, reduced local identity and public scrutiny, with some knock on effects for national governance if patchwork mergers occur across England.

9. Following this option, how do you think Fire and Rescue Services should be inspected to assess service quality and viability?

Fire and rescue services should be inspected by an external inspectorate just as occurs in the Scottish fire and rescue service – and in almost every other public body. The Audit Commission and ‘peer review’ approaches have failed. The fire and rescue service should have a national independent inspectorate, with powers to issue improvement/prohibition notices and with the ability to make recommendations to the minister. But to be effective, the inspectorate has to work to national standards, which have been subjected to consultation with firefighters’ representatives.

10. Following this option, how can we ensure democratic and community accountability?

There is only limited democratic accountability in the fire and rescue service now. The local merger option could weaken it further. Merged fire and rescue authorities still need the involvement of community groups, locally elected councillors, staff representative bodies and public forums.

11. What governance arrangements do you envisage for these entities?

In practice, there is no difference between the democratic accountability or the governance arrangements of a merged fire and rescue service and a combined fire authority.

## **B. Larger Scale Mergers**

*A merger of the existing 46 Fire and Rescue Services into a vastly reduced number of Fire and Rescue Services across the country.*

This section is really about **regionalisation**. However there may be little difference between locally determined (voluntary) mergers and a larger scale regional merger – the latter suffers from many of the flaws of the current model in terms of resilience, and may worsen democratic accountability.

The experience of the ambulance service may be instructive here. The number of ambulance trusts was reduced from 46 in 1990 to 31 in 2005, at the time of the Department of Health’s review of the ambulance service.<sup>12</sup> Further consolidation took place, so there are currently ten NHS ambulance trusts in England, with a single service in Scotland, Wales and Northern Ireland.<sup>13</sup> These mergers have not led to vast improvements in the service, to judge by media reports and by the testimony of trade unions in the ambulance service.

The issue of regionalisation of the fire and rescue services has been examined before. Major reorganisation was rejected by the Bain Review in 2002, although the subsequent government White Paper stated that ‘larger units are required to run the new fire and rescue service’. The last

---

<sup>12</sup> Department of Health, Taking healthcare to the Patient: Transforming NHS ambulance services, June 2005  
[http://webarchive.nationalarchives.gov.uk/20081006104705/http://dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH\\_4114269](http://webarchive.nationalarchives.gov.uk/20081006104705/http://dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_4114269)

<sup>13</sup> NHS, What is an ambulance trust?  
<http://www.nhs.uk/ServiceDirectories/Pages/AmbulanceTrustListing.aspx>

Labour government set up Regional Management Boards and anticipated regional fire authorities would be created once regional assemblies were established.<sup>14</sup> Of course the disastrous experience of FiReControl, along with the wider demise of regionalisation, put paid to those plans.

12. What do you think are the barriers to achieving a smaller number of Fire and Rescue Services?

The greatest barrier to larger scale mergers will be the reluctance of chief fire officers and fire authority members to lose what they see as control of (or responsibility for) service provision. Large scale mergers would therefore have to be forced on unwilling participants, who would erect barriers and who would be unwilling to make them work if they were forced through. There may also be some public backlash if such larger scale mergers are seen as a removal of their community based response.

13. Following this option, how many Fire and Rescue Services would you suggest is the optimum number, and along what geographical borders would they be organised?

The optimal number of regions depends on whether this proposal is driven by the imperatives of the fire and rescue service – principally the risk profile of England – or by existing local government political boundaries, which are not necessarily coherent. It also depends on potential reorganisations of other agencies with whom the fire and rescue service works: for example Local Resilience Forums, the ambulance and health services, social services or the police. The FBU is opposed to integration with the police.

14. Do you believe this option would achieve resilience across England?

The regional option could achieve greater resilience than is currently the case and certainly greater than ad-hoc local mergers, because it would have to be driven nationally. This would allow a new framework to be developed, setting standards for response, prevention, contribution to national resilience and interoperability with other services and agencies.

15. What do you think are the operational opportunities of this option?

The operational opportunities of this option could be:

- Greater consistency in service delivery standards
- Greater consistency in policy and planning
- Greater consistency in training
- Greater consistency in inspection (remove peer review and replace with inspectorate)
- Greater consistency in procurement
- Improved national resilience arrangements
- Greater consistency in standard operating procedures.

16. What do you think are the operational risks of this option?

Different risk profiles across the region may mean urban/higher risk areas receiving disproportionate resource (removal of resources from lower risk areas if funding is cut).

---

<sup>14</sup> House of Commons Communities and Local Government Committee, Fire and Rescue Service: Fourth Report of Session 2005–06, 5 June 2006: 8-9  
<http://www.publications.parliament.uk/pa/cm200506/cmselect/cmcomloc/872/872i.pdf>

17. What do you think are the resilience opportunities of this option?

The resilience opportunities of this option could be:

- Clearer communications between fire and rescue services
- Streamlined planning processes
- Simpler procurement
- Interagency communications simplified.

18. What do you think are the resilience risks of this option?

The resilience risks of the regional model may differ from the locally determined merger model. Locally determined mergers have (so far) involved similar services of comparable size with similar risk profiles to protect. If mergers are forced on services along political boundaries, there is a risk that some merged services will be badly unbalanced.

For example, the North West of England includes Greater Manchester and Cumbria. The West Midlands includes Birmingham and Shropshire. Vast differences in risk profile mean that the merged service would almost have to run two different services – one for the urban risk and one for the rural risk. The danger is that the balance between the two risk profiles could be skewed towards one and to the detriment of the other. Scotland is already going through the pain of moving resources from the central belt to rural Scotland in order to provide a more equitable service.

19. Beyond efficiency savings, what do you think are the benefits of this option? (Please comment on resources, training, national planning, control centres, capacity, operational performance, or anything else you feel is important.)

There are currently 46 training plans, leave arrangements, appointments and promotions arrangements and IRMPs. This duplication could be removed. The regional model may provide potential service development, delivery and improved performance benefits. Coherent, robust, well-researched, better resourced, professional planning, training, procurement, more efficient deployment of resources, interoperable and consistent across England to provide a more consistent and effective service to the public no matter where they live, work, travel or visit. It could also provide improved national resilience and more consistent standards of safety for firefighters. However the efficiency savings are not necessarily straightforward: for example, the economies of scale from the amalgamation of things like IT services and vehicle maintenance. An area as large as a region could not be covered by amalgamating these services into one office.

20. Following this option, how do you think Fire and Rescue Services should be inspected to assess service quality and viability?

The FBU supports the introduction of an inspectorate drawn from local government, fire and rescue services, employee representatives, and emergency planning. National outcomes and standards would be required to be able to measure performance and review. A centrally funded inspectorate with teeth that has the ability to undertake investigations into incidents that go wrong or where serious safety concerns are raised. It should also have the power to instigate research into all areas of concern.

21. Following this option, how can we ensure democratic and community accountability?

The current system provides limited democratic accountability. In some authorities, one cabinet member has responsibility for fire, while in others, twenty or so councillors are appointed by their

political groups. Some have little or no knowledge of fire service matters, yet have the responsibility for fire. In reality, they are simply a rubber stamp mechanism for the officers of the authority.

Whatever system of governance and accountability is put in place, it must be genuinely accountable, responsible and representative. Those on any governing boards should have, or be given, a thorough understanding of the roles and workings of the fire and rescue service and be able to question, from a point of informed concern, the recommendations of the operational and financial officers of the service. The fire and rescue service already has some regional structures in place and in the cases of Northern Ireland and London, they have been in existence for decades. Scotland is of course only just finding its way as a single service. In general, the FBU favours authorities/boards made up entirely of elected representatives, who are then accountable to their voters. The union opposes unelected quangos.

## 22. What governance arrangements do you envisage for these entities?

A combined fire authority could be formed to cover the merger of five or six county fire and rescue services. However as the scale of the merger increases, so the connection between the public and the service becomes more stretched. In an entity the size of a regional fire and rescue service, the weakness of the connection would mean that the political governance of the service (the fire authority) would very likely tend more towards a management role than a public representative role, unless representatives were directly elected. Accountability could be balanced by the election of 'lay governors' made up of business, community representatives, user groups and representative bodies.

## 23. To what extent do you think this option would achieve the required efficiency savings?

The regional model has the potential to reduce wastage and duplication of costs, including back office functions, procurement, training, HR, fleet management, buildings and governance. However these 'savings' should be reinvested to fund frontline firefighters, the inspectorate, research, etc. However, transition costs mean in the short term there will be the need to 'invest to save'.

### **C. The single service model**

*A merger of the existing 46 Fire and Rescue Services into a single English Fire and Rescue Service.*

The single service model could provide economies of scale to release funding to protect and improve the frontline service. However given the size of England, a single national service would still have to be broken down into regional commands. There are two close precedents for this arrangement: the nationalisation of the fire service during the Second World War and the recent creation of a national fire service in Scotland.

The current 'local-max' model, where central government oversees civil contingencies while everything else is designed, administered and delivered locally, is heading for the same kind of fragmentation that marred the fire service before the Second World War. It did not work then and it does not work now.

The introduction of the Fire Services (Emergencies) Bill 1941 established a 'National Fire Service' divided into 39 regional fire force areas. Standardised ranks were introduced that stayed in existence until 2003. The Manuals of Firemanship and Drill Book were originally published at this time. The Fire Service Act 1947 handed the service back to local control, but with centralised standards for conditions of service, establishments, appointments and promotions, training and equipment, training centres and pensions. These standards were regulated by the CFBAC and enforced by an

inspectorate. Axing this national coordination was a mistake. If Labour shadow ministers now recognise this and want to restore national coordination and oversight, then this is welcome.

The Scottish fire and rescue service was formed in April 2013. A balance sheet on the impact of a single service in Scotland is necessarily provisional for now after less than two years in operation. However the reasons behind the decision to create a single fire and rescue service in Scotland need to be clarified. The decision arose because of expected cuts after the financial crash in 2007-08. In the autumn 2010 both Scottish Labour Party and SNP leaders began to advocate it to free up resources for the frontline. SNP justice secretary Kenny MacAskill told the Scottish parliament on 10 May 2012: 'I have always made it clear that I did not come into post advocating the creation of a single service. However, the budget cuts have made it a necessity. On that basis and after discussions with those involved in the services, we have decided to make a virtue of a necessity'.<sup>15</sup>

A preliminary evaluation of the Scottish fire and rescue service would identify certain visible advantages and disadvantages. One positive is a more coherent overall structure, rather than eight separate boards and eight chief officer egos. It has also made political accountability clearer, looking at issues on a Scotland-wide basis, while also attuned to local needs. Another advantage lies with the standardisation of equipment, BA sets, equipment, PPE, standing operating procedures and training notes. This has made health and safety simpler.

However there have also been considerable costs, particularly in terms of job losses. The Scottish government's own figures show a reduction of all roles in the first year after the merger, with 297 frontline firefighter jobs lost between April 2013 and April 2014. In fact more firefighter jobs were lost in the first year after the merger than in the previous three years (251, going back to April 2010). Some 150 wholtime, 136 retained and 11 control jobs were lost in 2013-14, as well as 125 support posts.<sup>16</sup>

In 2013-14, in proportion control jobs have been hardest hit (-4.7%) – with the expectation of 50 posts to be cut in all. Next hardest hit is retained (-4.4%), followed by wholtime (-3.6%). Some one in nine (11%) of support roles have also been cut. Using CIPFA figures to breakdown by role, the figures show that middle managers – both wholtime and retained – have been hard hit, with around a quarter of these roles cut. FBU officials also report the worsening of crewing levels on front-line pumps with the second appliance to a fire now crewed by 4 firefighters instead of 5, which has implications for safety at domestic fires. Overall, firefighter job cuts in Scotland are no better than those in England. Therefore, it cannot be claimed at present that the creation of a single service has been an effective barrier to austerity.

#### 24. What do you think are the barriers to achieving a single Fire and Rescue Service?

As with large scale (forced) mergers, there would be barriers put up for personal and political reasons by chief fire officers and fire authority members. This option could take away all local democratic accountability. It would also mean that the peer review inspection approach would have to be dropped because there would be no peers. External inspection would be the ideal replacement, but a single English service would be so big that even an internal audit team would be so remote from front line delivery that it would be analogous to an external inspection. Firefighters fear that they would not be restricted by the current brigade boundaries and be expected to work anywhere in England with minimal notice, especially during spate conditions.

---

<sup>15</sup> Scottish parliament, Official report, 10 May 2012

<http://www.scottish.parliament.uk/parliamentarybusiness/28862.aspx?r=7430&mode=html#.VNtWxeasWSo>

<sup>16</sup> Scottish government, Scottish Fire and Rescue Service Fire Safety and Organisational Statistics, Scotland, 2013-14, 24 February 2015

<http://www.gov.scot/Publications/2015/02/9404/downloads>

25. Following this option, how do you envisage the operational structure of a single service?

A single English service would have the freedom to sub-divide itself into commands (regions or fire force areas as they were called during the Second World War) that reflect operational needs rather than arbitrary, probably political, boundaries of the large scale (forced) merger model. It would still require local/regional managers working to a national 'plan' and to national standards. Regional commands with coordination from the centre would provide effective leadership; this would also retain an element of local democratic accountability. The National Issues Committee (NIC) in Wales demonstrates a method of delivering national outcomes in relation to strategic priorities without compromising the autonomy of constituent fire and rescue services. The NIC deals with issues such as national fleet and transport, procurement, ICT platforms and national fire safety delivery.

26. Following this option, what governance arrangements do you envisage?

It is hard to see how a single English fire and rescue service could be treated as a service of local government, although in principle it could remain within DCLG. The FBU is opposed to placing the fire and rescue service under the Home Office, if that means closer integration with the police. There is more synergy with the ambulance service, although the Department of Health has not been considered previously. There are a number of other national public entities, such as the Health and Safety Executive (HSE), which exist autonomously within government departments.

A newly-constituted English national fire and rescue would have a central governing board, preferably made up of directly elected representatives. Such governance arrangements could not accommodate representation from all 46 current fire authorities, although it could have regional representation. It would not necessarily have to be based on political representation – like the current fire service National Joint Council or the HSE board, it could consist of representatives from the employers, the government and trade unions.

27. Do you believe this option would achieve resilience across England?

A single fire and rescue service in England could achieve resilience across England if funded appropriately and backed by national standards of response, equipment, training etc.

28. What do you think are the operational opportunities of this option?

A single fire and rescue service in England could provide more robust operational capacity and interoperability of the service. It would facilitate standardised training, leave, shifts, response attendance times and weight of attack, with national standard operating procedures and policies. Decisions on the fireground would be taken entirely on the circumstances of the incident, rather than, as they are all too often, dependent on what local resources are easily deployed and available. Opportunities for career progression for staff members would also be much greater with no barriers to movement across artificial county boundaries and exposure to different levels of operational activity would be beneficial to supervisory officers.

29. What do you think are the operational risks of this option?

The operational risks of a national model include the failure of large scale systems such as information technology, as occurred with the FiReControl project and in other areas of the public sector. The frontline response could be at risk if the service was not adequately resourced in terms of staffing, training and equipment. Initial interoperability issues could lead to mistrust.

30. What do you think are the resilience opportunities of this option?

Operationally, a single fire and rescue service in England could be beneficial. It could result in commonality of working practices, economies of scale should result in the delivery of better training and equipment and more resources being available for the development of safe working practices. With standardisation comes resilience, the same BA sets, standard gear on appliances, safety protocols working under the same incident command structures.

31. What do you think are the resilience risks of this option?

If a single fire and rescue service in England were used simply to realise savings, it could mean job losses, closure of even more controls and an overall reduction in level of service – especially given that broader policy is susceptible to wholesale change on a national scale.

32. Beyond efficiency savings, what do you think are the benefits of this option? (Please comment on resources, training, national planning, control centres, capacity, operational performance, or anything else you feel is important.)

The benefits of a single fire and rescue service in England could be:

- Clear strategy and overarching fire and rescue policy
- Common training
- Standardised appliances, fire kit and equipment
- Improved firefighter safety
- Greater interoperability within the service
- More consistent collaboration with other public services and emergency responders
- Greater equality and diversity within the service
- Consistent workforce HR management.

33. Following this option, how do you think a single Fire and Rescue Service should be inspected to assess service quality and viability?

Peer review would be impossible with a single service in England. The independent inspectorate would have to have wide powers to inspect or intervene locally and/or regionally, and a responsibility to spread good practice, in accordance with national standards. It must be answerable to an inspectorate body that includes employee representatives and the HSE.

34. Following this option, how can we ensure democratic and community accountability?

There would be efficiency savings by moving to a single service in England, but one of the costs would be a reduction in community accountability. Nationally, the composition of the board is important, alongside ministers reporting to parliament. Regional commands would have a duty to consult and liaise with local bodies. Fire stations would maintain their community links and accountability.

35. To what extent do you think this option would achieve the required efficiency savings?

A single fire and rescue service in England will not deliver immediate savings and would require some transitional investment, but the long term savings are large in comparison to the present structure. The most probable efficiency savings from a move to a single service would be the reduction in the number of principal officers, payroll services, legal services, insurance, procurement and human resource departments.

### 36. OTHER IDEAS

We are open to hearing about the achievement of efficiencies which protect the frontline through any other means and would encourage your suggestions.

There has been considerable political capital expended in recent months on a range of devolution matters, which may have implications for the structure of the fire and rescue service. Probably the biggest single driver has been the political situation in Scotland generated by the referendum on independence, where the campaign, close vote and the subsequent promises made for further devolution have sparked a wider discussion about England. Some politicians at Westminster have advocated devolution for England on its own merits, including fiscal devolution – the transfer of enhanced tax and borrowing powers to local government – and an end to decades of Whitehall centralisation. In the interim, this has included giving councils the power to introduce new council tax bands at the top end and split existing ones, following the revaluation of properties.<sup>17</sup>

Allied to this is widespread dissatisfaction with Westminster politics, perceived to be run by a small, self-serving elite, corrupted by expense claims and ever-more distant from the voters. Lower turnouts in elections, the decline in membership of the large parties, coupled with the growth of populist parties like UKIP, have led some to advocate political decentralisation as a means of reconnecting politics with ordinary people.<sup>18</sup> Another related trend has been the advocacy of city-regions as drivers of economic growth, what has become known as ‘metrocentralisation’. For example the influential City Growth Commission has identified 15 metro areas in the UK, each with over half a million inhabitants, which it argues should have the power to raise and fully retain its own taxes, undertake public sector reform through strategic integration, in a ‘devo-met’ settlement parallel with developments in Scotland (and Wales).<sup>19</sup> The launch of the Core Cities ‘Modern Charter for Local Freedom’ suggest growing momentum for devolving tax and spending powers.<sup>20</sup>

These developments, if they ever come to fruition, would have substantial implications for the fire and rescue service. Although no proposals have been tabled, it is conceivable that metro areas (and indeed larger combined county areas) might want control over their fire and rescue services. If devolution went this far, it might mean that the revenue for local fire and rescue services was raised locally, with little or no input from central grants. This would throw up implications for governance, but would still require common standards for training, equipment. In the wider international context, the German federal system requires that cities with over 80,000 people must have a professional (i.e. wholtime) firefighting force. Although other aspects of the German system are not applicable to the UK (notably the volunteer firefighters who have been trained through national service and service smaller communities), this is another model of professional firefighting.

The FBU is not advocating any metro/devolved model. However we believe these proposals are worth exploring, with full costings and with full transparency for the workforce. The key issues remain the safety of the public and the number of professional firefighters trained and fully prepared to meet the full range of 21<sup>st</sup> century hazards and emergencies.

---

<sup>17</sup> House of Commons Communities and Local Government Committee Devolution in England: the case for local government. First Report of Session 2014–15, 9 July 2014

<http://www.publications.parliament.uk/pa/cm201415/cmselect/cmcomloc/503/503.pdf>

<sup>18</sup> Ed Cox, Graeme Henderson, Luke Raikes, Decentralisation decade: A plan for economic prosperity, public service transformation and democratic renewal in England, IPPR North, September 2014

<http://www.ippr.org/publications/decentralisation-decade>

<sup>19</sup> RSA City Growth Commission, Unleashing Metro Growth: Final Recommendations of the City Growth Commission, October 2014  
<http://www.citygrowthcommission.com/wp-content/uploads/2014/10/City-Growth-Commission-Final-Report.pdf>

<sup>20</sup> Core, Cities, Modern Charter for Local Freedom, 10 February 2015

<http://www.corecities.com/what-we-do/publications/modern-charter-local-freedom>