

States of Jersey Fire & Rescue Service Association

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Deputy R. Ward
Scrutiny Office
States Greffe
Mourier House
St. Helier
JE1 1DD

27 October 2020

Dear Deputy Ward,

Government Plan Review 2021-2024

Further to your correspondence of 13 October 2020 regarding the Scrutiny Review of the Government Plan, please find this contribution on behalf of the Fire & Rescue Service Association.

On the points on which you invited comment, the Association feels it can offer no discernible views on the “Covid-19 – Test and Trace Programme” or “JHA - Sell a domestic dwelling no longer required by the Fire and Rescue Service”. However, in relation to the item “Re-organisation – Justice and Home Affairs”, I have included with this correspondence a copy of our Target Operating Model (TOM) feedback that was submitted as part of the consultation process. This feedback raises some key issues and questions central to the efficient and effective performance of the Fire & Rescue Service and I’d invite you to consider the content.

In addition, I would like to draw further attention to some key areas.

Operational independence

Her Majesty’s Chief Inspector of Fire and Rescue Services (HMICFRS) produced the report “State of Fire and Rescue – The Annual Assessment of Fire and Rescue Services in England 2019” and are due to inspect Jersey Fire & Rescue in 2021. It advocated that Chief Fire Officers need operational independence from political and executive involvement, of which the FRSA is supportive and even before our own review the similarities to our local model are apparent. Responsibility for the effective running of a Fire & Rescue Service must lie with the Chief Fire Officer as the most appropriately trained individual regardless of the Government’s tiered structure. The below is reproduced from the Overview of the report:

There are at least eight different governance arrangements in place across England, as well as variations of the same arrangement. Some fire and rescue authorities are a single person – a mayor or a police, fire and crime commissioner – while others are made up of over a hundred members as part of a county council. Each member, regardless of the model, holds a locally elected post.

Variation doesn’t necessarily matter. But the public need to know who is responsible for their service locally and what decisions are taken, which isn’t always the case. What is important is whether governance arrangements work. This is something we will consider further in the coming years.

Chief fire officers are employees of their fire and rescue authorities. Unlike chief constables in policing who have operational independence, chief fire officers do not. This can lead to tension between chief fire officers and their authorities. Some chief fire officers have been prevented by their authorities from implementing changes to improve the effectiveness and efficiency of their services, with some authorities making decisions that could be considered operational.

Chief fire officers should have operational independence to run their services effectively and efficiently to meet the priorities and commitments in their integrated risk management plans. In this report, I am recommending that the Home Office should issue clear guidance on the demarcation between governance and operational decision making to clarify and protect the role of chief fire officer.

Resourcing

GP21-OI3-16 of the Government Plan commits to appropriately resourcing the Justice and Home Affairs department in order to deliver emergency services, among others. Jersey Fire & Rescue Service has for several years seen continual reduction in staffing resources with no evidential risk assessment to justify the losses. Further examination of appropriately resourcing the Service is needed.

In this respect, it is also worth noting that the per capita rate of emergencies dealt with locally is at least on par with England, yet without the specialist teams and cross-county support arrangements for large or multiple incidents. As such, the ability for the Service to safely and effectively resource incidents, particularly with the findings of the Grenfell Tower Inquiry in mind, should be considered by appropriate local risk assessment rather than resourcing simply to budget alone.

Trusting you find this information of assistance to your Scrutiny Review, please also find attached the TOM consultation feedback for your consideration in this matter.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tim Le Cocq', written in a cursive style.

Tim Le Cocq
President, States of Jersey Fire & Rescue Service Association (FRSA)

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12 March 2020

Comment on Target Operating Model Phase 2

Restructuring the SJFRS is something that the organisation has dealt with on several occasions in the past and the common driving factor in all has been efficiency. There is a balance to be struck between these cost-savings and effectiveness, and with effectiveness comes safety. This is an area of concern for the FRSA, not only for the quality of service to the public but the commitment to firefighter safety.

Previous external Service reviews undertaken in 2006, 2008 and 2017 have recognised the difficulty in providing a comprehensive F&RS within a small workforce and made recommendations which included restructuring management but not at the expense of the number of FTE. Indeed, the previous HMI review of 2008 highlighted that consideration be given to increasing operational staff to provide greater capacity for core duties and maintenance of competencies, both of which effect the risks borne by the public and firefighters themselves. Since 2008 operational FTE has been reduced from 72 to 67.

Operational independence has also been identified as an issue, with CFOs prevented from meeting priorities of their IRMP by the Fire Authority. We support this view that locally the CFO should be held to account by Government but ultimately they should have operational freedom to implement effective and efficient change while the public must be able to understand who is responsible. National Operational Guidance recommends that strategic direction be developed through the Service's risk management plan and to determine the extent of their firefighting capability, strategic managers will consider their statutory duties and the foreseeable risk within their area; the CFO is best placed to oversee these decisions.

Effectiveness and efficiency can also only be measured against the risks the Island faces at any one time. The challenge includes maintaining competencies of on-call staff with limited weekly training which does not include all aspects/specialisms of a wholetime equivalent and therefore do not provide full resilience; resources need to be aligned to risk in terms of both numbers of staff and firefighting appliances; staff must also maintain an ever-increasing range of skills. Reduction in FTE and the ability of the Service to provide Protection and Prevention capacity has been directly related to austerity measures since 2008 and the MTFP. As part of cost-savings the Prevention department was the first to be cut, yet although rightly returning in the proposed model, it places those workloads onto an already reduced number of staff.

The recent internal Service Review identified that per capita the rate of F&RS emergencies locally is on par with England and has in fact been greater in 6 of past 10 years. The concerning issue is the increasing trend of dwelling fires which has been evident since 2008 and spreading the capability of the Service too thinly due to a reduction in staff and increased number of competencies to maintain, both F&RS core-based and those to achieve collaboration, will have

the potential for increasing risk to the public and firefighters alike, particularly in areas of F&RS statutory duties.

BUSINESS CASE

The business case underestimates the number of incidents attended by SJFRS at 700 per year, when for the past decade has been approx. 1100 per year.

TOM savings in relation to both SJFRS and SoJAS are both in the region of £40k versus £200k+ in other JHA services. It is suggested that this represents the fact that the majority of costs are staff related, allowing for minimal savings in restructuring. While efficiencies should be sought, it is both these departments that require additional support and investment in personnel over and above collaborative working. The balance between core duties and collaboration is a fine line with already reduced staff numbers and the *need* to improve collaboration at frontline level is unlikely to produce great monetary savings other than avoidance of recruiting more staff. Rather than a 'force multiplier' it can open the door to the greater risk of not achieving statutory duties; the SJFRS's capability to deal with more than one moderate incident at a time, in the many different forms we experience them in, is already limited without being spread thinner. Collaborative working should be entered into with an appropriate cost/benefit analysis with ongoing means to review the partnership over time to identify its effectiveness to public safety.

The business case also recognises the Island's changing and increasing level of risk which is amplified by the lack of cross-border support as is essential in the UK. The Director General's overall intent is identified as avoiding additional cost, which does not necessarily align with the ambition of providing a F&RS whereby it is critical to resolve emergencies swiftly, effectively and safely. The risk to the public and firefighters is our primary concern and would recommend that the Service is appropriately resourced to risk faced by the Island rather than focus on savings.

Jersey is an ambitious and aspiring worldwide corporate player but resourcing the emergency services has not been given the same level of priority. This can be seen in the recent SoJP recruitment to bring policing levels nearer in line with risk factors. Without the operational independence the SoJP retain, the reason why they are not included in this phase of TOM, it is likely they would also be subject to non-risk-based resourcing. The standards and accountabilities faced by SJFRS are the same as by a UK county Service but with far less resources & management to achieve them. For example, the National Operational Guidance work, the same amount of work across teams in the UK must be completed by 2 personnel locally in addition to other duty and operational commitments. Even smaller and more comparable jurisdictions such as the Isle of Man have a greater management resource to enable such work to be completed, work which is paramount to understanding our capabilities and safe working strategies.

The forthcoming HMICFRS review and IRMP will help establish where focus should be given, along with the Grenfell Tower Inquiry findings – the ability of the SJFRS to resource incidents in high-rise buildings to the same good practice that occurs in the UK, regardless of cladding issues, is a huge area of concern and compromises firefighter safety. We would urge the JHA directorate to await the results of these reviews/plans and commit to risk-related recommendations that are subsequently made.

Below sets out some further observations and questions, answers to which would be appreciated.

OBSERVATIONS

- DCFO – the only UK Fire & Rescue Service without a DCFO, or if not, at least 2 ACFO overseeing an Area/Group Manager structure – this structure is not following UK good practice in resilience and command structure. Although this post may have been dealt with in TOM phase 1, without the full organisational structure at that time it could not be foreseen how it would piece together with lower tiers.
- SoJPS retaining Deputy Governor and the associated support/resilience – not providing parity or across JHA Tier 3 structuring. The flatter senior management structure does not provide appropriate resilience in day-to-day Service management and in levels of incident command.
- A reduction in the number of managers and reduction in ranks has increased the level of responsibility within roles, particularly moving middle-manager Station Commanders to senior leadership level. Another tier of civil service over previous arrangement has been gained at the expense of a flatter operational management and therefore reduced frontline capacity.
- Duty Manager (Station Commander) shift pattern with 4 staff makes for poor wellbeing as working 10 days straight (3 in office, 7 on shift). Poor resilience as any sickness/unavailability must be covered by overtime – a 5 person shift pattern would provide for greater resilience & wellbeing and also provide for more desk working hours.
- It would appear that Station Commanders are being used to make up for a missing senior management team – depleted over time due to MTFP2, managed vacancies and non-replacement of senior retirees.
- SC role first job specific outcome is to deputise for the Area Commander as required, who in turn will deputise for the CFO – the flattening and reduction of the senior management structure has lessened resilience and however much it is not the intention, increases the likelihood that a SC could take on leadership responsibility for the Service where the CFO and both ACs are unavailable. Those already in post believe the step from SC to AC is already felt to be too great a jump in level of responsibility. This can be demonstrated by the fact the current AC position is only a partial match to role, yet the current SCs would be expected to deputise that role. Furthermore, if a DCFO were to be recruited it would very likely involve selection from the UK.
- Succession planning for CFO and subordinate roles more difficult for local candidates as unable to achieve same level of qualification/experience locally as would UK staff.
- The FRSA acknowledges that it is recognised by the Employer that changes to JDs will require negotiation with the FRSA as part of a previous pay deal. Further discussions will continue.

- JDs have been constructed with National Occupational Standards in mind and therefore summarise Job Specific Outcomes into brief sentences as can particularly be seen in the almost identical Firefighter JD. However, as JDs progress upwards through the F&RS structure the greater amount of detail in the Outcomes becomes unproportionate to the NOS for that role. In other words, there's not enough consistency in JD detail between ranks; of course, responsibility increases with rank but the JDs suggest the lower end of the structure aren't receiving the same amount of acknowledgment for the work undertaken.
- Similarly, when comparative Tier roles are compared across other JHA departments there is greater discrepancy again where sentences for a FF have been used, multiple paragraphs and bullet points have been used to define the finer detail of work related to SoJAS and SoJPS roles, for example. The principles of being linked together and parity within JHA don't appear to be represented here and this is a particular concern when going forward into a Total Reward Review.
- The brevity and broadness of Job Specific Outcomes in the FF job description can be demonstrated by the change of driving SJFRS vehicles to that of "emergency vehicles". Collaborative working already exists and will be enhanced but as a *specific* outcome this broadens the core duties outside of the F&RS remit with potentially large consequences with unknown reward.
- Station Commander roles listed as having been evaluated but no Increase/Decrease or Matching information has been provided.

QUESTIONS

- Only a minor saving has been identified by removing the DCFO role, leaving CFO with less support and organisational resilience – was a cost/benefit analysis applied and what was the outcome?
- The structure commits to 67 operational firefighting staff - how has this figure been arrived at? What evidential risk assessment exists to support this or is this purely staffing to budget?
- What, if any, gap analysis has been conducted to assess the Service's operational capability based on the local risk environment?
- Is the Service resourced to risk or demand, or budget?
- Will the 2 new-structure Station Commanders in Operations now be sharing the workload of the former Station Commander (Operations) position?
- It may not be an intention, but can it be confirmed that Station Commanders will not under any circumstances be Gold Command and/or in their capacity to deputise for the Area Commander, actually be deputising for the CFO?
- As part of the Terms & Conditions and pay agreement, the Firefighter Career Progression structure includes Specialist and Senior Firefighter roles with individual

role maps that do not appear to be represented in the JDs supplied. Are these roles intended to continue?

- The increase in essential qualifications associated with new JDs will require some form of transitional arrangement to enable staff to access full competency pay that they may now already be on and should not disadvantage them as the goalposts move. Courses and qualifications will come with cost and availability implications and this should not affect opportunity being made the same for all. What arrangements are in place to allow this to happen?
- Clarity needed in regard to which proposed Fire Safety qualification for FF is proposed. The Fire Service College run both Fire Safety Foundation (Fire Safety Level 3) and Level 3 Certificate in Fire Safety (Fire Auditors), neither are designed for operational personnel but for persons in a fulltime fire safety position. Which qualification is proposed and how is it suggested this fits into the operational FF role?
- Essential knowledge from FF upwards: comprehensive knowledge of Emergency Planning legislation – potential for further broadening of the role outside of core duties. Is this a necessary branching out for the FF role?

FRSA Executive Committee