



**The Fire Brigades Union  
Region 2 Northern Ireland**

**A Response to the NIFRS Draft Integrated  
Risk Management Plan, 2007/2008**



## Foreword

The Fire Brigades Union believe that Integrated Risk Management Plans are intended to determine fire and rescue service resource deployment with the objective of ensuring that the community is safe from fire and other emergencies, by employing a 'risk based' methodology based upon the three following principles;

**Intervention** – to have sufficient emergency resources [firefighters, emergency fire control operators and fire appliances etc] available to deal with fires and other emergencies when they occur.

**Prevention** – to stop fires and other emergencies before they occur by initiatives such as Community Fire Safety engagement, Home Fire Risk Assessments and measures intended to make the community aware of the hazard of fire and how to eliminate or minimise the risk.

**Protection** – Enforcement of Fire Safety Legislation intended to ensure that buildings are designed and constructed with inherent fire protection and that means of escape, first aid firefighting equipment and detection equipment is maintained.

Effective Risk Management is dependant upon the correct balance being struck between these three principles.

**No matter how comprehensive and effective protection and preventative initiatives may be, there will always be the need for adequate intervention capability.**

**31<sup>st</sup> January 2007**

## **Introduction**

This is the FOURTH Integrated Risk Management Plan consultation conducted by Northern Ireland Fire & Rescue Service (NIFRS), and potentially the most contentious. The Fire Brigades Union (FBU) is concerned that it may be the intention of the Fire Board to reduce intervention capability at locations identified in Proposals 3 and 4.

In recent months, and as a consequence of political and media awareness of the Draft IRMP generated by the FBU, representatives of NIFRS have denied that there is any intention to make cuts in its intervention capability. Despite the denial, FBU Officials suspect that NIFRS managers had anticipated a 'quiet consultation' and were quite unprepared for the scale of public and political reaction to the consultation generated by the FBU's initial reaction to the proposals.

The FBU hold concerns with the consultative process. We would contend that this and previous consultation documents have been sent to a select list of consultees. Whilst business and other interest groups feature on the list of consultees, we find it unusual that individual elected political representatives do not!

In recent weeks FBU Representatives have met with and outlined their concerns to the various Political parties. In addition, FBU members have actively engaged with the community in order to raise awareness of the implications for safety, should the proposals contained in the consultation be realised.

This document represents the FBU's response to the consultation draft, however we would reserve the right to make further comment on any aspect of the consultation as necessary at any future point in time. We have opted to respond in this format because we consider the questionnaire contained within the consultation document has been designed to elicit a particular response and consequently cannot be relied upon to convey an accurate and rounded view from the respondent.

The FBU would also contend that our experience as operational firefighters and control staff enables us to bring a unique and valuable expertise to the consultation. Our comments and observations are based on our experiences of many years at the 'sharp end' of Fire and Rescue work and carry a validity, over and above the comments and observations of other interested parties, who may, albeit in good faith, make responses from a less well informed perspective.

**Proposal 1**

Carry out a Risk Assessment of 'Other Buildings' (buildings which were not covered by the dwellings risk assessment completed in 2005/06)

The FBU welcomes Proposal 1 as a positive and progressive initiative, the results of which will underpin the Standards of Emergency Response. Additionally, when the findings of the buildings risk assessment are integrated with the Operational Intelligence Project, NIFRS will be better equipped to ensure that the right resources are delivered at the right time and in the right place. We anticipate that this measure will enhance safe and effective firefighting operations.

The FBU looks forward to commenting further on the outcome of this proposal.

## **Proposal 2**

Investigate the potential for the provision of 'Small Fires' Units.

It is difficult to comment authoritatively on this proposal as the FBU has not yet received from NIFRS any detail of the research referred to in the 2<sup>nd</sup> paragraph on page 11 of the consultation document.

In addition, as far as FBU Representatives to the Joint Appliances and Equipment Committee are aware, the development of a Small Fires Unit vehicle has been an item of agenda for some time now! This project is already well underway, and was so, prior to publication of the consultation document.

This raises immediate concerns about the real intent of proposal 2 and serves to further highlight FBU concerns about how meaningful the consultation process actually is!

The proposal refers to development of "smaller purpose built appliances with a reduced level of capability". In the absence of any further detail, it is reasonable for the respondent to assume that the Small Fires Units may not carry the same number of firefighters, range of equipment, or as much water as a traditional fire engine.

The FBU notes the statutory obligation placed upon NIFRS by article 15 of the Fire and Rescue Services Order (NI) 2006, which states that NIFRS shall take all reasonable measures for securing that an adequate supply of water will be available for the Board's use in the event of an emergency.

It is a fact that the majority of major incidents that the Fire and Rescue Service attend begin as small fires! The entire point of intervention is to prevent small fires from becoming major fires! How the Fire and Rescue Service intend to achieve this by mobilising appliances with a reduced level of capability is not clear.

It has been the experience of firefighters that when adequate resources are in the right place at the right time, fires are extinguished and damage is mitigated. Given that traditional fire engines are already in situ and staffed to deal with such 'small fires', it is unclear what advantage or improvement there will be in service delivery by investing further capital in the development of this type of fire appliance.

In the absence of the necessary information the FBU cannot support Proposal 2 as presented.

### **Proposal 3**

Review the locations of fire stations and resources in the Belfast Area.

Our initial concern with this proposal is that it has not been accompanied with sufficient empirical data to enable the respondent to make an informed comment. Whilst it might be prudent to periodically review the locations of fire stations and resources, any decision-making should be informed by statistical evidence.

FBU Representatives are aware that the NIFRS is not able to meet emergency response standards in areas of South, West and East Belfast, and would support appropriate measures intended to address this. However, any such measures must not be at the expense of meeting standards in other areas.

In recent years the NIFRS has sought to ensure 'resilience' in terms of its capacity to deal with;

- New Dimension Incidents, i.e. chemical, biological, radiological or nuclear attack,
- Simultaneous demand for resources in times of heightened operational activity
- Spate call conditions
- Periods of Civil unrest.

FBU Representatives believe that any review of stations and resources located in the Belfast area must maintain and preferably improve the NIFRS's capacity for resilience in all circumstances.

Accordingly, the FBU Representatives give **qualified support** to Proposal 3, the qualification being that resilience and emergency response standards are not diminished as a result of the proposed review.

#### **Proposal 4**

Review of second pumping appliances, taking into account temporal and seasonal risk and demand.

FBU Representatives and Members suspect that at the core of this proposal is an attempt by NIFRS to remove some or all of the 12 "least used" second fire appliances which are located within medium-sized towns across Northern Ireland.

We are suspicious that the real intent of NIFRS is masked in apparently innocuous "IRMP" language, such as "confirm or otherwise" and "remove the second appliance or replace it with a specialist type of vehicle". FBU Representatives believe that this language belies the real intent behind proposal 4.

Since FBU Representatives raised public and political awareness of this issue, and in particular since the cross-party resolution in the NI Assembly, senior NIFRS managers have attempted to allay the concerns of personnel at the locations named in the proposal and have cited arguments such as climate change and new technology as drivers for review, whilst also insisting that the process was only ever intended to be a review. Most noticeable is the subtle change in terminology and the myth being spun at a number of locations that the intention is to replace the second pumps with a rescue pump, crewed by 6 firefighters.

**So the question must be addressed; if the second pumps are to be replaced by Rescue Pumps, why is that not stated clearly in the draft?**

In good faith and with an open agenda, FBU Representatives attended a consultation meeting with the Area Commander Operations and the Group Commander Operations Development. The NIFRS representatives were at pains to point out that the Draft Consultation was in fact "a consultation about a consultation" and that no decisions had been taken on any of the Proposals.

FBU Representatives and Members remain suspicious that Proposal 4 is little more than an exercise to pave the way to cuts on the back of a flawed consultation process whereby decisions already taken by Senior Managers, would be rubber stamped by the NIFRS Board using the cover of IRMP.

The FBU's position on Proposal 4 is rooted firmly in two key considerations;

1. Public Safety.
2. Firefighter Safety.

As Fire and Rescue professionals we contend that both of the above will be compromised in two ways;

1. Speed of attack (time taken to attend)
2. Time Lag between attending appliances (currently 3 minutes maximum to enable a safe system of work)

At this point we could rehearse detailed technical and practical arguments as to why the two points above make such a difference, but we do acknowledge that NIFRS managers also have extensive experience and understanding of firefighting and we will proceed on that basis.

The success of intervention depends upon speed and weight of attack and NIFRS managers acknowledged this when new emergency response standards were published on 1<sup>st</sup> April 2006.

Taken from pages 11 & 12 of: Fire Authority for Northern Ireland "Northern Ireland Emergency Response Standards & Integrated Risk Management Action Plan 2006/07"

Response. Making a Difference

*A fast response to incidents can make the difference between life and death. The FSEC process therefore concentrates on the effect of attendance times as the primary driver for reducing risk to life by operational means.*

*It is also important that the correct number of firefighters attend each incident to enable firefighting operations to be conducted in a safe and effective manner. Collectively this response is known as the speed and weight of attack.*

*The Fire Authority proposes to respond to substantive response areas in accordance with the table below:*

Substantive Response Area	Attendance Time of Appliances*	
	1st Appliance	1st Appliance
HIGH	6 mins	9 mins
MEDIUM	12 mins	15 mins
LOW	21 mins	24 mins

*Emergency Response Standards*

*Attendance Time of Appliances will be measured from the time NIFRS Control receives the call to the time of attendance at the incident.*

*The new standards require a crew of five personnel on the first appliance and four on the second. NIFRS will continue to send an enhanced response of three pumping appliances to fires where persons are reported as missing.*

Respondents to the consultation on this occasion (including the FBU) agreed with the standards above, and the Authority implemented them.

It is not apparent to the FBU just how the NIFRS will meet those attendance standards in the areas where the removal or replacement of the 2<sup>nd</sup> fire engine is proposed. FBU Representatives are already aware that NIFRS routinely fails to meet its declared standards of response, particularly in those areas served by single appliance stations. FBU Representatives believe this is dangerous and disadvantages the residents of those mainly rural areas. We therefore challenge the board of NIFRS to reveal its current response standard failures, particularly in single appliance station areas, and give a guarantee to the NI Community that this situation will not be compounded as a result of further cuts in provision in other areas.

It is important to note that even though the locations named in Proposal 4 are classified by NIFRS as "medium risk", this is not entirely true. Closer examination of the demography will reveal that those areas also contain significant elements of high risk such as Lone Pensioners and Rented Accommodation which are the main indicators for dwelling fire risk.

In Proposal 4 the language, such as "second appliance usage at some stations is low" is misleading as it may cause the reader to form the impression that there are fewer fire calls! This is not the case; the real reason behind the statistical fluctuation is due to a policy decision by NIFRS to reduce the attendance to Automatic Fire Alarms. There are indeed fewer mobilisations of fire appliances in certain circumstances, but it is disingenuous and misleading to assert that there are less fires!

FBU Representatives are aware that on most of the stations referred to in Proposal 4; second appliance usage has in fact risen in 2006. Most of the increase in usage is related to confirmed fires rather than AFAs. This highlights just how flawed the arbitrary figure of 100 mobilisations actually is.

Proposal 4 will not result in any fewer firefighters and appliances attending an emergency incident, but will result in them attending after it is too late for them to have any useful impact in terms of saving life or mitigating fire damage!

Although the Fire Brigades Union is broadly supportive of any move such as that within the 2006/2007 IRMP to direct more resources towards dwelling fire risk, we must not lose sight of the potential for major life loss and economic impact if fires or other incidents occur in buildings other than dwellings.

We believe that given that the special services and other buildings risk assessments have not yet been completed, it is premature of NIFRS to consider drastic proposals that may lead to any reduction of fire cover.

**For clarity, the Fire Brigades Union cannot support proposal 4, and calls upon the Board of NIFRS to direct its management team from proceeding with this dangerous proposal on the grounds of Public and Firefighter Safety.**

For further information you may contact;

The Fire Brigades Union, 14 Bachelors Walk, LISBURN, Co Antrim, BT28  
1XJ Tel; 028 92664622. FAX; 028 92667844.

Internet: [www.fbuni.org](http://www.fbuni.org)  
Email: [02office@fbu.org.uk](mailto:02office@fbu.org.uk)