



**CHESHIRE
FIRE
BRIGADES
UNION**

**RESPONSE TO CFRS DRAFT ANNUAL ACTION PLAN
2022-23**

CHESHIRE

Written and compiled by Cheshire Fire Brigades Union

Foreword

The Fire Brigades Union (FBU) is the democratic, professional voice of firefighters and other workers within Cheshire Fire and Rescue Service. We represent the majority of operational firefighters, control operators and green book staff within CFRS, NWFC as well as across the UK.

Cheshire Fire and Rescue Service (CFRS) is the statutory fire and rescue service for Cheshire and is administered by the Cheshire Fire and Rescue Authority (CFRA).

Integrated Risk Management Planning is a holistic, modern and flexible process, supported by legislation and guidance, to identify, measure and mitigate the social and economic impact that fire and other emergencies can be expected to have on individuals, communities, commerce, Industry, the environment and heritage.

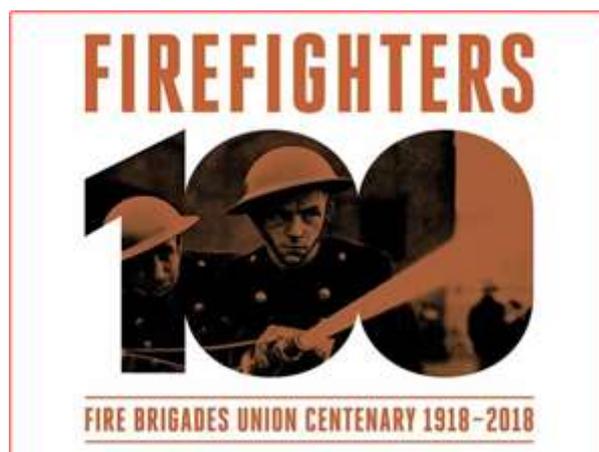
CFRA's when establishing local options for risk reduction and management within annual action plans, must take account of the duties and responsibilities outlined in the national framework, the emergency services order, the Civil Contingencies Act and the Regulatory Reform (Fire Safety) Order.

Cheshire is made up of some significantly deprived areas as well as some less socio-economically challenged. Cheshire is a diverse county with a mix of commercial and industrial risks, particularly the Petrochemical Industry.

The FBU has over 100 years of experience in representing workers in our industry, we strive to ensure our members are skilled at their craft and that their voices are heard.

The reader will note that despite the Integrated Risk Management Plan (IRMP) being a consultation document, and that the FBU represents what can be described as *the* key Stakeholder, that there is not

one single mention of the FBU in the entire document. We note that is an emerging and new theme in the North West region which seems a co-ordinated approach intended to reduce the visible presence of the FBU in the FRS community.



The FBU urge CFRS and CFRA to work with the FBU and our members for the betterment of the service we provide to the communities we protect rather than waste energy on disrespecting the FBU.

The Fire Brigades Union hopes that the elected members of the fire and rescue authority, other locally elected councillors and Members of Parliament who have an interest in the fire and rescue service and its employees will take this opportunity to support the FBU recommendations and ensure that the people who work in the fire and rescue service and who risk their lives on a daily basis along with their representative body are treated with the respect they deserve.

Covid-19:

The challenges the Service has faced as a result of the pandemic have been far reaching and have impacted every area of the service. The only function that has remained largely unchanged is the emergency response side where after following Covid secure guidelines crews have continued to attend the full range of incidents giving a first class service to the communities of Cheshire.

The ability of the Service to continue to operate throughout the last eighteen months has been predominantly down to the partnership working with the Fire Brigades Union under the auspices of the National 'Tri-partite' agreement that provided a workable arrangement for UK FRS's to meet the demands of an ever changing pandemic landscape from March 2020.

The Tri-partite agreement allowed for individual Fire and Rescue Services to identify local needs and work together with the FBU to draw up risk assessments. This proved highly successful in Cheshire with FBU Officials and Managers going above what was required to ensure the risk assessments were fit for purpose and met the demands of the Service whilst also ensuring the wellbeing of staff was considered. These agreements put in place a framework enabling Cheshire Fire and Rescue and our members to deliver:

- Providing over 80,000 Covid vaccines across Cheshire to date.
- Delivering prescription medicines to vulnerable residents.
- Transporting food parcels to help those in need within the community.
- Supporting the mass distribution of personal protection equipment to health and care colleagues.
- Helping our local authority partners identify extremely vulnerable people so that necessary support could be put in place.



Other areas where the FBU made a significant impact was the provision of individual BA masks for operational staff, ensuring that local H&S reps were at the forefront of creating and maintaining Covid secure workplaces and also supporting FBU members putting themselves forward for additional roles such as vaccinators etc. It is therefore hugely disappointing that no mention of this collaborative work is mentioned in the Draft Annual Action Plan 2022-23, to ignore the work undertaken by FBU officials and members which allowed the Service to deliver more essential services to the communities than any other UK FRS is frustrating and puts a question mark over future collaboration. It should also be noted that the Tri-partite agreements collapsed due to the unilateral withdrawal of the



National Fire Chiefs Council, this left both the NJC and FBU high and dry in terms of collaboration.

One area the Fire Brigades Union expressed concern about in terms of cost versus benefit was the appointment of resilience firefighters during the course of the pandemic. The suggestion that this group of retired firefighters would provide sufficient resilience in the event of large scale fire cover shortages was misplaced, ill thought out and hazardous. The Service already had a willing cohort of fully trained competent firefighters from the On Call system that wanted to provide that resilience, many of whom had been furloughed and were struggling financially as a result of the pandemic. To overlook them in favour of a group of mostly retired fire officers who had not undertaken any operational activities for over ten years in some cases was a huge slap in the face for our On Call firefighters at a time when retention and reward are already an identified issue on that system.

The stand out message from the pandemic is collaborative working benefits everyone and produces results, withdrawing from it causes friction and disenfranchises large sections of the Service.

Promoting the use of Sprinklers

Cheshire FBU fully support the greater use of Sprinklers and fire engineered solutions. Whilst the emphasis has been on vulnerable domestic homes and business we believe the campaign should go much further, such as legislating for fitting in all schools, education settings and in high rise premises.

Schools in England are nearly twice as likely to suffer a blaze as other types of commercial building. Zurich Insurance analysed the fire risks posed by 26,866 primary and secondary schools in England and found the average school posed a fire risk 1.7 times greater than non-residential buildings.



Despite being far riskier than average when it comes to fires, many schools also lack the equipment needed to prevent small fires becoming major disasters.

Equally, as fire fighters we know that High Rise premises – commercial or domestic, pose some of the most complex and hazardous incidents. Installing sprinklers in these premises would dramatically reduce the risk to occupants and responders.

Cheshire FBU suggest that a joint Authority-Service-Union lobbying campaign is commenced, writing to business, commerce and Government with a joint statement as part of this campaign.



Response to Road Traffic Collisions

The Authority proposal in the last Integrated Risk Management Plan (IRMP) sought to introduce thirteen Rapid Response Rescue Vehicles (RRRU's) in an attempt to improve the response to incidents on highways across Cheshire, claiming that “the capability will enhance our response to road traffic collisions”.

The Fire Brigades Unions' opposition to this proposal was that to spend over £520K on vehicles that are to be crewed with only 2 fire fighters, to be deployed in to some of the most high risk environments – motorways, without the safe systems of work in place to ensure fire fighter safety, with an expectation under moral pressure to act is not acceptable. **How is it that the RAC and AA will not enter live motorways and set up to work without police fend off or motorway closure in place, yet CFRS think it can risk the lives of its staff in the same environment?**

The FBU issued a 'Safety Critical Notice' to CFRS on 11 April 2017, regarding the failure to risk assess, train for or provide safe systems of work when crewing frontline fire resources with 3 or 2 fire fighters.



Cheshire FBU opposed the introduction of these vehicles at the time as they offer nothing in terms of improved outcomes for the public or the safety of fire fighters.

At the heart of our views on this response is the health and safety of our members and the communities we serve.

Our member's health and safety is a matter of contractual, statutory and regulatory compliance.

12 months on the service have failed to address the key public and firefighter safety concerns – a commitment given to the FBU by the authority.

The issues we have with these vehicles and the planned response are enclosed alongside this action plan response.

Recommendation – The Authority convenes an urgent cross party meeting with the FBU to discuss the safety concerns around these vehicles and concept.



Estates Modernisation

The CFRS draft annual plan states the following:

'The Authority has an extensive programme of modernisation underway for its estate covering most of its fire stations and its housing stock.

Many of our fire stations are of dated building stock and our modernisation programme has brought our premises up to date to meet the needs of a 21st century fire and rescue service.'

However, whilst Cheshire FBU applaud the investment by the authority, the modernisation of the buildings and its facilities for our Cheshire firefighters are not fit for the 21st century, nor are they even matching other fire and rescue services which should be a cause of shame for the elected members of the CFRA.

That being said however, the standard of workplace facilities for our members has over recent years become unacceptable and do not provide dignity in the workplace. Whether this be the outdated fire stations some of which are in a state of disrepair, the day crewing houses at Congleton, Northwich or Winsford, or even the new build fire stations - the needs of firefighters are not being adequately and appropriately addressed.

Specific information regarding minimum welfare facilities for personnel, in particular sanitary conveniences, washing, showering, changing and resting, is contained in the Workplace (Health, Safety and Welfare) Regulations 1992.

The workplace health safety and welfare Approved Code of Practice (ACOP) supplies further advice and guidance regarding workplace provisions and has special legal status.

Regulation 20, 21 and 24 of the Workplace (Health, Safety and Welfare) Regulations states that facilities shall not be suitable unless they include separate facilities for men and women for reasons of propriety.

Our members have opposed the creation of 'unisex pods' or unisex changing facilities since they were first proposed, and common issues have been found at each station where they have been installed. The service can no longer dismiss the views of its staff.

Therefore the FBU require the following to be implemented on all Fire Stations and service premises: (Recommendation 4)

Toilet Facilities

All toilets must be situated within designated separate rooms for men and women.

- Any toilets situated within or off a communal area (not a corridor) are not appropriate and are not acceptable
- All toilets and the rooms containing them must be kept in a clean and orderly fashion
- All rooms containing toilets must be adequately ventilated and lit

- A machine providing hygienic sanitary provision with the choice of tampons and towels must be provided within each Women's toilet facility
- A sanitary disposal bin must be provided within each women's toilet facility
- FRS' must contract the collection and cleaning of sanitary receptacles
- Bags and wipes for disposing sanitary wear must be provided within each Women's toilet facility
- All toilets must be fully enclosed with floor to ceiling walls and doors with a lock on the inside
- All windows must be obscured by frosted glass and blinds or curtains



Washing Facilities

All shower/washing facilities must be situated within designated separate rooms for men and women. Individual shower cubicles with floor to ceiling partitions and doors for privacy must be located within each designated room. The shower facility should include a wet and dry area to ensure that the wash area is in the vicinity of a changing room. Doors to be capable of being secured from the inside and the facilities in each such room are intended to be used by only one person at a time.

Wet area must include:

- A supply of hot and cold running water
- Shower with a non slip tray and fully enclosed cubicle, not shower curtains.
- Non slip flooring
- Shelf to place personal toiletries on
- Shower gel dispenser with gel in it



- Sufficient lighting and ventilation
- All windows will be obscured by frosted glass and blinds or curtains
- Doors to be capable of being secured from the inside and the facilities in each such room are intended to be used by only one person at a time

Dry area to include:

- Sink, with a mirror and a shaving point provided for both genders
- Soap dispenser
- Hand dryer
- Non slip flooring
- Hooks for clothing, towel, underwear and wash bag
- Bench or pull down seat
- Hairdryer
- Windows must be obscured glass and include blinds
- Signage – clearly labelled women or men
- Bin for refuse
- Personal locker
- All windows will be obscured by frosted glass, blinds or windows
- Doors to be capable of being secured from the inside and the facilities in each such room are intended to be used by only one person at a time

Lockers/personal storage areas

All lockers/personal storage areas must be situated within designated separate rooms for men and women.

Lockers can either be situated within washing/changing facilities or within rest facilities. It is not acceptable to situate lockers within communal areas.



Fire and Rescue Service Training Venues

As detailed above under Permanent Workplace. It is vital that prior to any training exercise carried out within a Fire and Rescue Service Training venue that an assessment is carried out in terms of distances of travel required to ensure that sanitary facilities are located nearby and that no staff are disadvantaged by gender. Hot showers, toilets and changing facilities must be available to staff in addition to a suitable area for rest breaks.

PPE

Personal Protective Equipment (PPE) should be gender specific and there is simply no excuse why this should not be the case. Our female members are upset and angry that they continue to be expected to attend work in duty rig uniform or structural fire-kit that is designed for a man, this is undignified and unsafe.

Under the Personal Protective Equipment at Work Regulations when health and safety risks cannot be adequately controlled by other means, employers must provide employees with suitable PPE. PPE is not suitable if it is badly fitted, uncomfortable, puts a strain on wearers or makes the work unnecessarily difficult.

This unisex approach to PPE can lead to significant problems. Items such as fall-arrest harnesses need to fit well but differences in chest hips and thighs can affect the way that the straps fit. Another example is safety boots as a typical women's foot is both shorter and narrower than a typical man's foot, so a smaller boot may be the right length but not the right width.

All staff must have size and gender specific clothing.

Pregnancy and Nursing

A private rest area designed for pregnant women and nursing mothers must be developed in every workplace.

The area must be quiet, clean, and lockable from the inside, have a sink with hot and cold running water and should include a draining area. The cold water supply is to be drinking water and marked as such.

The area should be conveniently situated in relation to sanitary facilities and provide:

- A multi purpose chair that would include the facility for pregnant and nursing mothers to lie down
- A large paper towel dispenser
- Isolated bells that can be turned on and off

- Dimmer lighting
- A lockable refrigerator
- Baby changing facilities
- Wipes and disposal bags for Nappies
- Engaged sign when locked
- Drinking utensils
- Blinds on windows

The room will hold a priority use for pregnancy and nursing mothers. At all other times the room could be used for quiet/prayer time.

Rest Facilities

Firefighters should be afforded decent and fit for purpose resting facilities, as opposed to the current Calcott Chairs. This Service and Authority made the political and ideological decision in 2008 to remove the resting facilities that cost nothing in maintenance and replaced them with the current resting chairs which are dirty and have the potential to cause musculoskeletal injuries to firefighters - **as highlighted in the services own health and safety report.**



We have pointed the Service and Authority to the facilities or arrangements in neighbouring services such as Merseyside FRS, Lancashire FRS, Staffordshire FRS and North Wales

FRS which are new and bespoke and wonder why Cheshire firefighters are provided with lesser facilities.

The questions our members, your firefighters, ask is 'why are we worth less or treated less favourably than our colleagues over the border?' This question was also asked by the FBU, and was supplemented by our own six point proposals on facilities last year.

If this service and Authority truly believe its people are its greatest asset and want to be best in class and an employer of choice it will work with the FBU to provide decent and dignified resting facilities.

Please see at appendix 1, the workplace facilities document that has been tabled by Cheshire FBU.

In Addition please see the attached motion to the Authority which the service asked our members to 'pause' whilst they set up a working group – it is clear the senior management of the service have no desire to provide comparable facilities to our firefighters in Cheshire, but the Authority have previously stated it wants the best – well now is the Authorities opportunity to demonstrate that support.



Recommendation – The Authority reviews the current facilities and approves the request to implement fit for purpose facilities that afford compassion, comfort and dignity.



Reducing False Alarms

The draft plan states “In the coming year we will work to reduce the number of false alarms we receive from domestic premises”.

Cheshire FBU provide qualified support for the work to reduce unwanted fire signals arising from Automated Alarms. Given the reduction in the number of fire appliances that are available to respond to emergencies in Cheshire we support the principle that our resources must be available for those in life threatening circumstances.

The qualification is that this work to reduce false alarms is achieved by awareness, education and prevention work and not by removing the operational response to premises.

Our residents pay for our service through the council tax precept and businesses contribute through their business rates – everybody is entitled to and deserves a response.

There are serious dangers and consequences from delaying or failing to respond to premises that have activated an alarm, and we have seen already from the delayed response to commercial premises until followed up by confirmation of a fire, that incidents have resulted in a fire that the damage and risk is increased. **We do not turn out to false alarms – we only return from them.**

Learning from Grenfell

The Grenfell Tower fire on 14 June 2017 resulted in a tragic loss of 72 lives and was evidently a watershed moment for fire and rescue services in the United Kingdom. The bereaved, survivors and residents – as well as firefighters – have waited far too long for an official report into the fire. The union commends the GTI for the dignified treatment of those who died or who lost loved ones. The FBU welcomes the recommendations and will work together with other interested parties to ensure they are implemented swiftly. There are many practical matters to be resolved, which the union is committed to assist with.



To understand the actions of all individuals on the night of the Grenfell Tower fire requires establishing the circumstances under which key actors operated. The FBU believes the drive towards deregulation of fire safety has set the context in which owners, contractors and fire services operated in recent years.

The FBU expects the recommendations will be applied to every fire and rescue service across the UK, not just the LFB. Consistent training requires national standards.

The union believes the recommendations will require substantial additional resources for the fire and rescue service, which should be provided from Westminster and the devolved administrations. Other recommendations have technical and resource implications. This includes amendments to the Joint Doctrine. The entire fire sector must learn the lessons from the Grenfell Tower fire and put in measures to effectively correct them. This requires a statutory stakeholder body that includes the FBU.

The FBU is disappointed that the GTI has not yet taken a stance on the minimum height for classification of high rise residential buildings (33.4). This has been the subject of much discussion and weakens some of the GTI's recommendations. The FBU supports the 11 metre (4 storey) definition used in Scotland, and we hope that Cheshire Fire Authority and Service management will echo these calls to change the classification used in England.

Ultimately Cheshire could see a high rise property fire of significant scale, and whilst we have seen more pre-planning and training in the aftermath of Grenfell, it is the response model and resources – fire fighters that will improve the safety of our residents and responders, something that we know is extremely fragile in Cheshire at the moment.



Review of Specialist Appliances

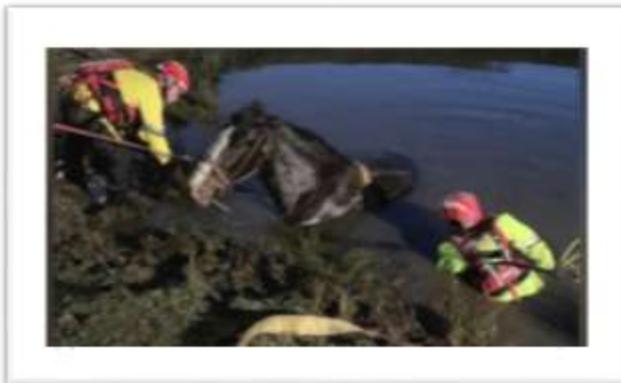
Cheshire FBU support a review of the type and location of specialist resources.

The modern Fire and Rescue Service requires specialist equipment and innovation to adapt to the changing risks our fire fighters are exposed to. This includes new manufacturing processes, climate change and extreme weather and unfortunately the risk of those who seek to divide our communities through acts of terror.

In order to manage our response and resolve incidents we already have aerial appliances, rescue boats, a command unit, a major rescue unit, a high volume pump, an animal rescue unit and a technical rescue unit. The FBU called for a welfare specialist Unit and a Managing Contaminants Unit in the last IRMP and we have assurances from the service that despite these still not being rolled out that they are approved and in progress – work to deliver these now needs to be focussed.

Whilst Cheshire FBU support the review and will work on testing and risk assessment, we need to say that this support is qualified – when our members learn new skills and perform activities that are not within the role we expect our members to be recognised and rewarded for their efforts.

An example of this currently is where we have Rope Rescue Supervisors, Animal Rescue Supervisors and Swift Water Tactical Advisors – employees taking on a specialist role developing tactical plans and leading the Rescue or intervention outside of the rank/role structure.



Currently they receive no reward for this responsibility or commitment – and the result is clear – we struggle to maintain these skills and roles as our members do not feel valued and the service loses these critical functions as a result and has to rely on other Fire and Rescue Services.

We expect those at the bottom of the organisation to be treated and valued in the same manner as those at the top of the organisation – where additional workloads and additional responsibility attracts reward and recognition.

Emergency Cardiac Response

We note with concern the following statement contained within the Authority's plan:

"However these negotiations have now been ongoing for over five years, with no effective agreement or resolution in sight. The Authority is determined to press ahead"

It is the case that this activity sits outside of the firefighters role – this has been accepted as such by the national employers and even the UK Courts, much the same as Marauding Terrorists Incidents (MTA).

Cheshire FBU is part of the national collective bargaining arrangements - done through the NJC. We note that proposals have been made to both London and Greater Manchester for the contractual provision of MTA, done via negotiations through the NJC.

Cheshire FBU have been clear all along that we are not ideologically opposed to Emergency Cardiac Response, demonstrated by the pilot by our members and negotiated by Cheshire FBU Officials.

If the service wish to table a proposal then Cheshire officials will consult our members for their views before having discussions with the National Executive Council and the NJC Technical Working Group – and we have made this commitment to senior managers already.

But the Authority should be clear – it does not have the supremacy to try and impose this aspiration nor undermine the bargaining arrangements or the Unions position. Equally it should be mindful of how it responds to Cheshire FBU's aspirations and recommendations on other matters if it wishes to have appropriate and constructive dialogue on matters.



Response to Floods, Water Incidents and Water Safety

We support the review of the Cheshire Water Safety plan and our response to Water Incidents, - indeed this has arisen out of our response to the last CFRS IRMP.

The service are fortunate in that we have a number of water safety specialists in our membership and team of executive officials. This has enabled us to work collaboratively through both informal and formal structures such as the Joint Safety Committee to improve the training and resourcing of our water response crews.

The Fire and Rescue Service in England still has no statutory duty to respond to water rescue incidents – this means that vital government funding for firefighter posts, equipment and training is not provided. The Authority should write to the Fire Minister to make the case for funding and support.



Following calls from Cheshire FBU to reinstate capsized training for all powerboat for rescue trained staff and swift water rescue technicians this is now programmed into the training planner for stations that staff the services rescue boats, we wait to see if this is carried on to all swift water rescue technicians.

FBU Cheshire continue to call on CFRS to train all staff in basic Water & First Responder (DEFRA Mod2) to ensure its staff are safe when operating in water/flood environment, this will also ensure that the communities of Cheshire are better protected by have suitably trained Firefighters responding to incidents in their area. Currently CFRS water response comes from the North of the County for any water related incident in the south. Not only does this prolong any potential rescue attempts of casualties whilst waiting for suitably trained crews to arrive but it also drains vital appliances from the north.

FBU also calls for VHF radios for the services rescue boats, and for the service to adhere to the requirements for working on classified waters such as the Manchester Ship Canal and River Mersey.

Recommendation: CFRS to train all staff in basic Water & First Responder (DEFRA Mod2). The Authority should write to the Fire Minister to make the case for funding and support in the absence of Fire having a statutory duty.

Fire Cover Review

The FBU view this approach as simply unacceptable. CFRS has set itself a response standard that is not challenging, and the people of Cheshire deserve better.

With the loss of national standards of fire cover and targets for responses to be set locally, the standards have gone through the floor.

In 1981, the Central Fire Brigades Advisory Councils set up a Joint Committee to review the standards of fire cover. They recommended that proper risk assessment must necessarily have close regard for local circumstances, and that identification of relevant local factors and analysis of their significance in terms of risks were matters for the professional judgement of Chief Fire Officers.

Figure A2 shows the standards as they were then agreed.

Risk Category*	Attendance Time of Fire Appliances		
	1 st appliance	2 nd appliance	3 rd appliance
Special Risk (High)	Pre	Determined	Attendance
A	5 minutes	5 minutes	8 minutes
B	5 minutes	8 minutes	
C	8 to 10 minutes		
D	20 minutes		

A risk - normally to be found in the largest cities or towns of the country it should be of substantial size and should contain a predominating concentration of properties presenting a high risk of life loss or damage to property in the event of fire. Examples of such areas might include:

- (i) Main shopping and business centres, with department stores, shopping malls and multi-storey hotels, and office properties.*
- (ii) Concentrations of theatres, cinemas, clubs, dance-halls and other entertainment centres.*
- (iii) Concentrations of high-risk industrial or commercial property.*

B risk - normally to be found in the largest cities or towns of areas not falling within category A risk. For an area to be as B risk, it should contain continuously built-up areas of substantial size with a predominating concentration of property presenting a substantial risk of life loss or damage to property in the event of fire. Examples of such areas might include:

- (i) Shopping and business centres, predominately of multi-storey properties, offering some degree of concentration.*
- (ii) Concentrations of hotels and leisure facilities such as occur in the larger holiday resorts.*
- (iii) Concentrations of older multi-storey property offering substantial amounts of residential accommodation.*
- (iv) Industrial or trading estates containing some higher-risk occupancies.*



C risk - normally to be found in the suburbs of the larger towns and built-up areas of smaller towns. For an area to be classified as C risk, it should contain built-up areas of substantial size where the risk of life loss or damage to property in the event of fire is usually low, although in certain areas the risk of death or injury may be relatively high. Concentrations of property may vary, but will generally be of limited extent. Examples of such areas might include:

- (i) Developments of generally post-war housing, including terraced and multistorey dwellings, deck-access housing and blocks of flats.*
- (ii) Areas of older, generally pre-war, detached or terraced multi-storey dwellings, with a predominance of property converted for multiple occupation.*
- (iii) Areas of suburban terraces, semi-detached and detached residential properties.*
- (iv) Mixed low-risk industrial and residential areas.
Industrial or commercial areas of smaller houses where there are few highrisk occupancies*

D Include all areas other than those classed as Remote Rural (RR), not falling within Categories A, B or C.

Local fire and rescue services now set their own targets and as you can see from the table above, areas of Cheshire would have fallen within the risk category of A or B under the old national standards with CFRS having to ensure fire appliances arriving to the incident within 5 minutes for the first (and second for A risk) appliance and 8 minutes for the second. In 2021, some 15 years later, we have not improved standards but dramatically reduced them.

The response standard in 2021 is 10 minutes for the first appliance to arrive on scene *where there is a risk of death or serious injury*; this to be achieved on 80% of occasions, so even with a low bar set to achieve, CFRS still plans to fail on 20% (1 in 5) of occasions with the standards narrowly confined only to incidents with a risk of death or serious injury.

Furthermore, CFRS do not measure the response standards for the arrival of second and subsequent fire appliances for reasons known only to them however without the second and subsequent appliances on many occasions there are not sufficient firefighter numbers at the incident to safely resolve the incident. The FBU believe that is a serious performance management flaw and is intentionally omitted to ensure an appearance of high performance.

Cheshire FBU have repeatedly raised concerns with regards to how CFRS captures its data, the Government guidance for how to capture a response time for a fire appliance (regardless of whether it involves a risk of death or not) is the minutes and seconds elapsed from the time of call to the arrival of the first appliance to the incident.

CFRS omits the time it takes for fire control to get the information from the community member, an essential part of the emergency service operation without which the appliance will not be mobilised to any incident. Of course the result of stripping out part of the response time is that CFRS declares a response time which is not a response time, but the time it takes for one appliance to get from a fire station to an incident. It portrays a quicker time than it really is and is essentially hoodwinking the reader.



If we look closer at the real figures, compiled by the Home Office you will see the evidence is that the response times for CFRS has increased over the years.

In discussions with the FBU, Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) – who independently assess the effectiveness and efficiency of police forces and fire & rescue services – in the public interest, were clear that CFRS should be including the call handling times in their recorded and reported times.

During the winter of 2019 all four unitary councils in Cheshire – Cheshire East, Cheshire West and Chester, Halton and Warrington all wrote to Cheshire Fire and Rescue Service calling for an improved Cheshire attendance standard having passed resolutions

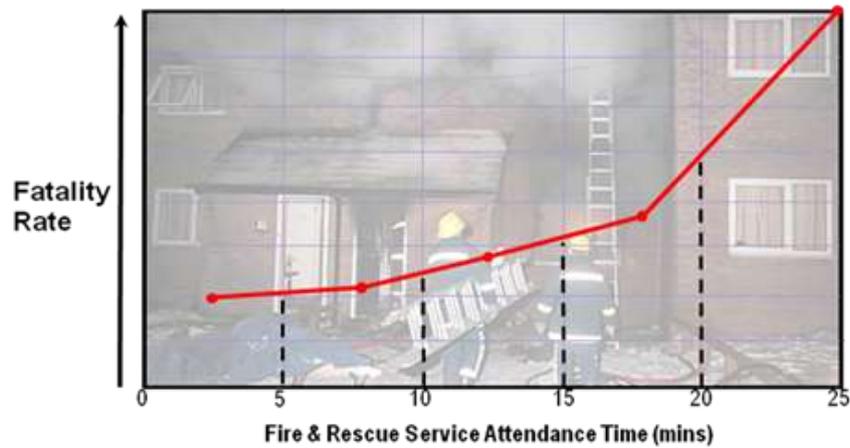
Those resolutions – which were supported and voted upon by members of this Fire Authority called for:

This council believes that all residents in every village and town in Cheshire East and across the County, need to feel confident about response times and fire cover where they live. Therefore this council resolves to ask the Leader of the Council to write to the Policing and Fire Minister to lobby for:

- An urgent government review of the impact of austerity on fire services and response times
- Restoration of the cuts to fire service finances over the last nine years.
- A decent pay rise for Cheshire Firefighters and staff. And to write to the Chief Fire Officer at Cheshire Fire and Rescue to ask that the Fire Authority considers the following recommendations:
 - That as part of ongoing fire service reviews, the current 10 minute target time for fire engines to respond to dwelling fires is expanded to include historic buildings, office buildings, industrial sites, schools, hospitals and other public buildings.
 - Other Incident types such as Flooding, water rescue, rescue from Height and Incidents involving Hazardous materials are all included within the Cheshire 10 minute standard.
 - That the Cheshire Fire and Rescue 10 minute standard is inclusive of the call handling time – as advised by the home office, formerly department for communities and local government.
 - That the design and build of future fire stations adopt the aspirations of our towns Climate Change Emergency motion and that the Fire Authority considers passing their own Climate Change Emergency motion. 23 Therefore it is very concerning that this new standard has not been included within the draft IRMP for public consultation given that all Councils have requested it and that it was supported and voted for by Authority members. This improved standard would drive forward excellence, improve response times and public outcomes and record performance against all life risk incidents. The reasons for not doing this are 'it would not be helpful' which in itself is worrying, the FBU and our members are clear that this new standard should be implemented and scrutinised through the existing authority committees.

The following graph displays the rapid rise in rate of fatalities the greater the response time, remembering that to safely conduct most operational activities a minimum of nine firefighters are required as demonstrated by the CAST

scenarios. So a first attendance while useful does not stop the clock ticking as the safe systems of work identified by CAST requires the full resource provision of 9 firefighters as a minimum.



Recommendation- the Retained/On Call needs major investment on terms and conditions if we are to see an improvement in appliance availability. Given Cheshire's problematic reliance on On-Call appliances, we need to encourage and support greater availability –this comes with reward and recognition and payment models as seen in other Fire and Rescue Services have seen this achieved.



Protecting the workforce from contaminants and disease – FBU Decon Campaign

DECON – to prevent and protect

Fire contaminants can increase the risk of cancer and other diseases, but simple changes can help fire fighters to protect their health and that of colleagues and their families.

Here in Cheshire the senior management team and the FBU have worked collaboratively to start to improve the awareness of, and response to contaminants, such as creating a contaminants group and displaying posters on service premises alongside reviewing our policies and procedures.

UCLan's 2020 Interim Report found that UK firefighters are 4 x more likely to get cancer in their working life. Key findings include:

- Contaminants can be inhaled, ingested, or absorbed through the skin
- Skin absorption of fire effluents increases as body temperature increases. Some studies suggest that skin absorption increases by 400% when body temperature increases by 5C
- Contaminated kit such as dirty gloves and helmets re-expose firefighters
- Skin, head and neck cancers are more common than average in UK firefighters.

Cheshire FBU call on the service to work with our officials and committee to implement the following key recommendations from the report as part of our response and planning:

For Fire Personnel:

- Respiratory protective equipment (e.g. SCBA) should be worn at all times whilst firefighting
This should also include during salvage and turning over activities and other activities undertaken by FRS personnel (and/or others) after firefighting has been completed, but whilst the building contents are still 'gassing off'. Respiratory protective equipment should be one of the last items of PPE removed during de-robing (after decontamination).
- PPE that is suspected of being contaminated should be transported back to the station or workplace in an air-tight container to prevent cross-contamination.
- Avoid eating, drinking or smoking with unwashed hands whilst wearing, or after de-robing PPE that may be contaminated.
- After attending a fire incident, all personnel should change into a set of clean, dry clothes as soon as possible, ideally before re-entering the appliance (or FDS vehicle).
- PPE should be clean and should be thoroughly decontaminated after every incident to avoid a build-up of toxic contaminants. PPE should be inspected for wear and damage on a regular basis, and replaced as necessary.
- It is important to protect areas of exposed skin and airways when cleaning soiled PPE/equipment.



This requires appropriate respiratory protection (e.g. face masks or face coverings) and gloves.

- “shower within an hour” when returning to the station from an incident, or following a live fire training exercise.
- Regular health screening and recording attendance at fire incidents over the course of a firefighter’s career is strongly advised and will be key to the longer-term monitoring and management of health.

For Fire and Rescue Services:

- Every Fire and Rescue Service (FRS) must have fully risk-assessed decontamination procedures (en-route to, during and after fire incidents), and ensure all relevant staff are trained in implementing these procedures.
- All FRS personnel should receive regular and up-to-date training on the harmful health effects of exposure to toxic fire effluents, and how these exposures can be reduced, minimised or eliminated.
- All FRSs should have policies in place for the routine care, maintenance, inspection and professional cleaning of PPE.
- Establishing and strictly maintaining “designated zones” within the fire station must be a priority for preventing cross-contamination. PPE should never be worn in areas of the station designated a clean zone (e.g. kitchens, living quarters etc.) and should be stored away from personal items.
- To reduce secondary exposures, appliance cabs and equipment from emergency response vehicles should be cleaned and decontaminated on a regular basis, especially after incidents where exposure to any combustion products occurred.

Recommendation: That the service work with the FBU to implement the key recommendations above and transpose these into the policies of the service and workplace culture.

Emerging risks and Pre – planning

Safety issues and pre planning for Safety of Grid Scale Lithium-ion Battery Energy Storage Systems

Sources of wind and solar electrical power need large energy storage, most often provided by Lithium-Ion batteries of unprecedented capacity.

Incidents of serious fire and explosion suggest that the danger of these to the public, and emergency services, should be properly examined.

Li-ion batteries can fail by “thermal runaway” where overheating in a single faulty cell can propagate to neighbours with energy releases popularly known as “battery fires”. These are not strictly “fires” at all, requiring no oxygen to propagate. They are uncontrollable except by extravagant water cooling. They evolve toxic gases such as Hydrogen Fluoride (HF) and highly inflammable gases including Hydrogen (H₂), Methane (CH₄), Ethylene (C₂H₄) and Carbon Monoxide (CO). These in turn may cause further explosions or fires upon ignition. The chemical energy then released can be up to 20 times the stored electrochemical energy. Acute Toxic gases and Inflammable Gases are “dangerous substances” controlled by COMAH 2015.

Quantities present “*if control of the process is lost*” determine the applicability of COMAH.

“Battery fires” in grid scale BESS have occurred in South Korea, Belgium (2017), Arizona (2019) and in urban Liverpool (Sept 2020). The reports into the Arizona explosion [8, 9] are revelatory, and essential reading for accident planning.

A report into the Liverpool “fire” though promised for New Year 2021, has not yet been released by Merseyside Fire and Rescue Service or the operator Ørsted; it is vital for public safety that it be published very soon.

No existing engineering standards address thermal runaway adequately, or require measures (such as those already used in EV batteries) to pre-empt propagation of runaway events.



Lacking oversight by the HSE, the entire responsibility for major accident planning currently lies with local Fire and Rescue Services. Current plans may be inadequate in respect of water supplies, or for protection of the local public against toxic plumes.

Recommendation: That the Risk of and pre planning for Safety of Grid Scale Lithium-ion Battery Energy Storage Systems be undertaken as a matter of priority.



HMICFRS

We note the following paragraph in the draft plan:

Finally, the Government has announced that it will publish a White Paper which will outline its plans for future reforms of fire and rescue services across England. The Paper is expected to outline changes to our governance and other aspects of how the Authority operates.

The Authority will consider the potential implications of the Paper once it has been published.

FBU members were rightly angered by the recent criticisms made of our service and our profession by Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS). These criticisms, set out in three reports issued by HMICFRS, are part of the preparation of a serious attack on our service and how it is delivered. This coming attack also targets the pay, conditions and collective rights of firefighters.

FBU members can be justifiably proud of their work over the course of the pandemic. Firefighters, including emergency fire control staff, have ensured the delivery of our service in the face of a deadly virus. FBU members have been required - as 'key workers' - to carry on attending the workplace while millions of other workers were asked to stay at home. In itself, this placed FBU members and other key workers in the private and public sector at greater risk than others. It has been the efforts of such workers – including FBU members – which have seen our communities through the pandemic. All deserve thanks, recognition, and reward for doing so; or at the very least an end to government imposed pay cuts.

In addition to delivering core fire and rescue service functions, many FBU members have also taken on – on a voluntary basis – additional work directly related to the Covid-19 response. Amongst other things, these activities included driving ambulances, training ambulance drivers, training other agencies in the use of PPE and moving the bodies of the deceased.

These activities were introduced following discussion between the FBU, the fire service employers and the National Fire Chiefs Council (NFCC). The resulting agreement ensured appropriate attention to risk assessment, training and PPE.

This agreement, and its successor with the NJC, enabled our members to deliver core functions as well as playing an important role in the Covid-19 response.

The FBU needs to be loud and clear in response to this political attack on our profession, our Union and our conditions of service – we will not accept any attempts to dismantle our collective bargaining right or any attempt at silencing the voices of our members.

We expect this Authority, who often champions CFRS as the best fire service in the country to stand up against any political attacks on fire fighters.



Summary Recommendations

- Cheshire FBU suggest that a joint Authority-Service-Union lobbying campaign is commenced, writing to business, commerce and government with a joint statement as part of this campaign
- The Authorities convenes an urgent cross party meeting with the FBU to discuss the safety concerns around these vehicles and concept.
- The Authority reviews the current facilities and approves the request to implement fit for purpose facilities that afford compassion, comfort and dignity.
- CFRS to train all staff in basic Water & First Responder (DEFRA Mod2). The Authority should write to the Fire Minister to make the case for funding and support in the absence of Fire having a statutory duty.
- The Retained/On Call needs major investment on terms and conditions if we are to see an improvement in appliance availability. Given Cheshire's problematic reliance on On-Call appliances, we need to encourage and support greater availability –this comes with reward and recognition and payment models as seen in other Fire and Rescue Services have seen this achieved.
- Implement a reward and recognition framework for specialist skills negotiated with the FBU.
- That the service work with the FBU to implement the key recommendations within the FBU/UCLAN report and transpose these into the policies of the service and workplace culture.
- That the Risk of and pre planning for Safety of Grid Scale Lithium-ion Battery Energy Storage Systems be undertaken as a matter of priority.
- The Authority, who often champions CFRS as the best fire service in the country to stand up against any political attacks on fire fighters and make this clear to government ministers.



CHESHIRE FBU

Response to RRRU proposals

2021



THE PROFESSIONAL VOICE
OF YOUR FIREFIGHTERS

Formal FBU response to the Cheshire Fire and Rescue Service RRRU proposals

Arising from Cheshire Fire Authority Integrated Risk Management Plan 2020-2024

CFRS have proposed the roll out of up to thirteen RRRU vehicles to be staffed by our members for operational deployment and response across the county. How they will be staffed and what incident types they will be deployed to is a matter for consultation with the Fire Brigades Union.

At the heart of our views on this response is the health and safety of our members and the communities we serve.

Our members health and safety is a matter of contractual, statutory and regulatory compliance, specifically but not limited to:

- **Health and Safety at Work Act 1974**
- **The Management of Health and Safety at Work Regulations 1999**
- **The Safety Representatives and Safety Committees Regulations 1977**
- **Health and Safety Executive (HSE) Approved Codes of Practice**
- **Workplace Health Safety and Welfare Regulations 1992**
- **Personal Protective Equipment at Work Regulations 1992**
- **The Fire and Rescue Services Act (2004)**
- **The Civil Contingencies Act (2004) The Civil Contingencies Act 2004 (Contingency Planning) Regulations 2005**
- **The Human Rights Act (1998)**
- **Water Resources Act (1991)**
- **Confined Spaces Regulations**
- **The Part-time Workers (Prevention of Less Favourable Treatment) Regulations 2000**

The CFRS Integrated Risk Management Plan

The 2020-24 IRMP sought approval for the roll out of Rapid Response Rescue Units (RRRU) across all Retained (On-Call) stations.

The CFRS proposal generated a lot of responses which can be summarised as:

Public Feedback – 48 comments/respondents raising concerns around crew safety and the need for effective risk assessments to ensure safety and appropriate service delivery.

Staff Feedback – Again concerns over crew safety, other concerns were that it could deplete availability of full (structural) fire cover and appliance availability

Stakeholder Feedback – Fire Brigades Union opposed this proposal due to safety concerns. In response, Fire Authority and ACO Waller gave an assurance that any risk assessment would be agreed with the FBU prior to go live.

The Fire Brigades Opposition to this proposal was that To spend over £520K on vehicles that are to be crewed with only 2 fire fighters, to be deployed in to some of the most high risk environments – Motorways, without the safe systems of work in place to ensure fire fighter safety, with an expectation under moral pressure to act is not acceptable. **How is it that the RAC and AA will not enter live motorways and set up to work without police fend off or motorway closure in place, yet CFRS think it can risk the lives of its staff in the same environment?**

The FBU issued a ‘Safety Critical Notice’ to CFRS on 11 April 2017, regarding the failure to risk assess, train for or provide safe systems of work when crewing frontline fire resources with 3 or 2 fire fighters.

The Fire Authorities responsibility, and indeed statutory obligation to consult with staff over any changes in the provision of appliances and crews through consultation with their representative bodies, is outlined in a succession of documentation provided to Fire Authorities by the then Office of The Deputy Prime Minister, ODPM (now Department Communities and Local Government and Home Office).

The ODPM states ‘IRMP Guidance note 1 final version’ in relation to IRMP’s that:

“An important underpinning principle, however, is that there must be adequate evidence to support and justify any changes proposed, ensuring the maintenance and improvement in community safety”

The service have yet to produce any evidence to demonstrate how community or fire fighter safety will be improved by this proposal.

Only a fire appliance crewed by a minimum of 5 fire fighters can ensure that a critical and safe intervention or rescue is made, underpinned by risk assessment, task analysis and agreed safe systems of work.

All this proposal does is to mask true attendance times and the number of operational fire appliance assets we have available to respond to our communities, whilst also seeking to afford on call staff some increased remuneration opportunities rather than deal with the appropriate recruitment and retention of RDS staff.

The service has not identified which critical roles it is dispensing with on these 'Rapid Response Vehicles', is it the Officer in Charge, the pump operator, the tool operator, the safety officer, the Breathing apparatus wearer, the Entry control officer?

“Fire and Rescue services will need to provide evidence that the planned response is safe and appropriate. This is likely to involve carrying out detailed risk and task analysis of the planning scenarios”

(Office of the Deputy Prime Minister 'Preparation for the Fire Service, Emergency Cover Toolkit')

The nationally circulated guide 'The Dynamic Management of Risk at Operational Incidents, A Fire Service Pamphlet' states:

Fire Authorities, in common with other employers, have many legal duties in respect of safety. The most relevant to this document are those imposed by sections 2 and 3 of the Health and Safety at Work Act 1974 and regulations 3 and 4 of the Management of Health and Safety at Work Regulations (MHSAW), 1992. These require employers to ensure, so far as is reasonably practicable, the health safety and welfare of employees and others affected by their work activities.

In order to achieve this, they must carry out and record suitable and sufficient risk assessments, then implement the control measures necessary to ensure an acceptable level of safety. Both the risk assessments and the control measures must be reviewed to confirm their continuing validity”

The fire and rescue service retains responsibility for the health, safety and welfare of its personnel working in the risk area. It also has a duty to consider the effects of its actions on the safety of other people.

Detailed risk and task analysis of the planning scenarios

The FBU are yet to receive any proposed risk assessment or Task Analysis for the deployment of 3 or 2 Fire fighters on Rapid Response Rescue Units. This work was a key assurance from the Service and the Authority.

The only published and accepted Task Analysis for the Incident types below are those contained within the Pathfinder report and later the Critical Attendance Standards (CAST).

CFRS proposed RRRU Incident Types for RRRU with less than a crew of four riders:

DRAFT Single RRRU Mobilisation Proposals

Attendance as PDA single vehicle					
Event Sub Type	Event Type Description	Description of event	Current PDA	Action Plan	Keywords
FL02	FLOODING	AFFECTING ELECTRICS	1 SIU (OS) OR 1 PUMP		
FL05	FLOODING	VULNERABLE PERSON	NO ATTENDANCE	AP4903 FLOODING VULNERABLE PERSON	ELDERLY
NW03	NWAS	GAINING ENTRY	1 PUMP OR SIU (OS)	AP 4826 NWAS GAINING ENTRY	ASSISTING, ACCESS, AMBULANCE
LO01	PERSON LOCKED IN/OUT	LIFE/PROPERTY RISK	1 SIU (OS) OR 1 PUMP	AP2120 PERSON LOCKED IN/OUT - LIFE/PROPERTY RISK	BUILDING, TRAPPED
LO02	PERSON LOCKED IN/OUT	NO LIFE/PROPERTY RISK	NO ATTENDANCE	AP2121 Person Locked In/Out No Life/Property Risk	BUILDING
RP07	RESCUE OF PERSON	IN MINOR ENTRAPMENT	1 PUMP	AP2150 Rescue of Person in Minor Entrapment	FINGER, BIKE, CHAIN, HEAD, STUCK, CAUGHT
RR02	RING REMOVAL	CASUALTY UNABLE TO ATTEND STATION	1 PUMP OR SIU (OS)		STUCK, FINGER
SD02	SSC	WEATHER RELATED	NO ATTENDANCE		TREE, FALLEN, ROAD BLOCKED, GARDEN FURNITURE, TRAMPOLINE

The proposed model then goes further by proposing that the RRRU's are mobilised to any incident type as a supporting resource on the Pre-Determined Attendance (PDA) including where it is planned and known that it will be first in attendance at the Incident:

DRAFT RRRU Mobilisation Procedures



- **RRRU 'First on Scene'** – for mobilising the RRRU to any incident either where it is the sole appliance from that fire station (supplemented by a full PDA from elsewhere), or where it is proceeding to suitable incident types (e.g. RTCs) ahead of the structural appliance:
 - Min 2 persons
 - 1 x WM7/ICA*
 - 1 x RRRU Driving Skill*
 - *These skills can be held by the same individual. I.e. a Crew Manager who holds a WM7 and RRRU skill could proceed to the incident in the RRRU with a Firefighter who holds neither of these skills.
- **RRRU 'Supplementary'** – for mobilising the RRRU with additional personnel to supplement the structural appliance. The RRRU must follow the structural appliance to ensure it does not arrive at the incident first:
 - Min 1 person
 - 1 x RRRU Driving Skill
 - No manager skills are required to turnout in this capacity.

The expansion of these vehicles to all incident types is unacceptable and will place our members at foreseeable and unnecessary risk. The FBU require the Task Analysis for all of the Incidents that CFRS plan propose to use and deploy RRRU's. It should contain the information on the number of people and the allocated tasks and should replicate the following format:

	2 minute			4 minutes		6 minutes	
First appliance:	RRRU						
Officer in charge	Risk assessment		Supervision		Briefing	Supervision	
Firefighter 1	BA Rescue						
Firefighter 2				Managing equipment			1 st aid
Second appliance:	Type B Structural Appliance (arrival time 5 minutes after 1 st appliance)						
Officer in charge						Briefing	Com support
Firefighter 1							Firefighting
Firefighter 2							Firefighting
Firefighter 3							1 st aid
Firefighter 4						BA control	

The FBU have previously tabled a proposal which is a key risk and task analysis of all identified operational scenarios to the fire Service, which sets out the minimum safe number of firefighters for a number of known operational scenarios (33 in total). It is referred to as the Critical Attendance Standard, more commonly known as the CAST methodology.

The CAST methodology allows for a tightly-controlled phased arrival of fire appliances at emergency incidents. It takes into account of the effect of this phased arrival on both the incident and on the ability of firefighters to carry out Standard Operating Procedures (SOP's) without increasing the risk to themselves above a level which they would normally expect and facing situations which are themselves inherently risky. Determining what is an acceptable phased arrival – or LAG – in fire appliance attendance times i.e. the time between the arrival of the first fire appliance and the second fire appliance sent as part of the initial emergency response to an incident, is critical.

For example, one of the most commonly attended categories of incident for the Fire and Rescue Service is for a dwelling house fire and rescues are regularly and often successfully carried out in such incidents by crews. The risk and task analysis provided within the CAST scenario for such an incident identifies that a minimum of 9 firefighters are required to successfully resolve this type of incident safely. For clarity the CAST scenarios are wholly based on risk and task analyses undertaken by Government as part of the Pathfinder Review, it is effectively a Government scenario replicated and supported by the FBU.

The Review of Standards of Emergency Cover undertaken by Government in 1999 recognised this problem, and the 'Pathfinder' report is crystal clear on this point. In any planning decisions relating to when the required firefighters and equipment should arrive at an emergency incident, it warns against placing firefighters in a position where they have no option but to act – even when there are insufficient resources available:

“... it is essential to avoid situations which could motivate or pressurise firefighters to act unsafely in the interests of saving life.”

(Review of Standards of Emergency Cover - Technical Paper C – Response & Resource Requirements)

The issue of mobilising these RRRU's is of serious concern to the FBU, both from NWFC without the appropriate incident knowledge and even more serious is the custom of RRRU's self-mobilising to incidents. In the case of Nantwich who have regularly self-deployed to property fires. The RRRU group have confirmed that it is the services intention is to continue with self-mobilisation.

This practice must cease. Only by having agreed and risk assessed Pre-determined Attendance standards can we ensure the safety of the public and of crews responding.

The safe standard for firefighting operations at a dwelling fire persons reported can be illustrated below.

Dwelling Fire: Single Occupancy - 2 to 4 casualties involved rescue via 135 ladder

Firefighting on ground floor. 2 to 4 casualties trapped on upper floor and visible on arrival. Rescued via ladder. Initial entry via ground floor, second team via ladder.

1 Incident Command Role Firefighter & 9 Firefighters	10 TOTAL									
Task Sequence and Personnel Requirements	Personnel Deployed									
Initial information gathering										
Incident command										
Cause establishment										
General fireground liaison										
Provision of hose reel branch										
BA Entry Control										
Provision of water from pump/tank - high pressure pump										
Footing ladder										
Slip and pitch 135 ladder										
Gaining entry to premises with breaking in gear										
Firefighting/Rescue 2 Firefighters BA - hose reel branch										
Provision of hose reel branch										
Provision of water from hydrant to pump/tank										
Firefighting/Rescue 2 Firefighters BA - hose reel branch										
Remove casualty to external opening - 2 x BA										
Remove casualty to external opening - 2 x BA										
Isolation of services										
Remove casualty to place of safety										
Remove casualty to place of safety										
Ventilation of other areas - 2 x BA										
Firefighting/Rescue 2 Firefighters BA - hose reel branch										
Casualty treatment										
Cutting away - 2 x BA										
Liaison with ambulance										
Ventilation of premises - fire compartment - 2 x BA										
Fireground servicing - 2 x BA										
Salvage										
Turning over - BA - thermal imager										
Damping down - 2 hose reel - 2 x BA										
Debris/water removal - with salvage equipment										
Fireground servicing - 6 x BA										

Resource replenishment water											
Make up equipment											
Make up equipment											
Debrief											

EQUIPMENT REQUIRED
 135 Ladder x 1, 70 mm Hose x 3, BA Board - Complete x 1, BAECO Tabard x 1, Barriers/Cones/Tape x 1, Breaking in Gear x 1, Breathing Apparatus - Standard Duration (SDBA) x 6, First Aid Kit x 1, Hose Reel and Branch x 2, Hydrant Standpipe (Single) Key and Bar x 1, Pump with High Pressure Capability x 1, Radio Comms x 9, Resuscitator x 2, Salvage Equipment x 2, SDBA – Spare Cylinder x 8, Set of Hose Ramps x 2, Small Gear x 2, Specialist First Aid Equipment x 1, Thermal Imager x 1, Turning Over Tools x 1, Water Tank – 1800 Litres x 1

Task No	Task Description
1	Initial information gathering
2	Incident command
3	Cause establishment
4	General fireground liaison
5	Provision of hose reel branch - 2 Firefighters
6	Provision of water from pump/tank - high pressure pump
8	Provision of hose reel branch - 2 Firefighters
10	Slip and pitch 135 ladder
11	Provision of water from hydrant to pump/tank - 2 Firefighters
15	BAEC
16	Remove casualty to external opening – BA
17	Remove casualty to place of safety
18	Casualty treatment
19	Liaison with ambulance – Officer
20	Remove casualty to external opening – BA
21	Remove casualty to place of safety
24	Gaining entry to premises with breaking in gear - 2 Firefighters
25	Salvage - 2 Firefighters
27	Ventilation of other areas – BA
28	Damping down - 2 hose reel –BA
29	Turning over - BA - thermal imager
30	Cutting away – BA
31	Isolation of services
35	Resource replenishment water
36	Debrief
37	Ventilation of premises - fire compartment – BA
38	Debris/water removal - with salvage equipment
39	Firefighting/Rescue 2 Firefighters BA - hose reel branch

40	Firefighting/Rescue 2 Firefighters BA - hose reel branch
41	Firefighting/Rescue 2 Firefighters BA - hose reel branch
44	Make up equipment - 7 Firefighters
45	Footing ladder
47	Fireground servicing - 2 BA
48	Fireground servicing - 6 BA
49	Make up equipment - 1 Firefighter

In line with the services proposal for deployment to all Incident types, the following detailed assessment for each planned activity needs to be provided to the FBU.

We note that the service have stated:

"the vehicle is capable of driving through 700mm deep water however crews are advised not to go deeper than the wheel hub (half wheel depth)". It also says that "water should be assessed before entering, if possible, scout the crossing on foot using wading poles to check the depth, consider taking another route."

-These crews have had no wading training on water awareness courses

-These crews don't have any water kit, only structural fire kit for wading through contaminated water. A further thought on this is that the average fire fighters protective boot is only just over "half wheel height" with the road surface likely to be undulating or possibly damaged due to the flood water most crews will be getting wet feet. Once leather fire boots are contaminated with flood water they need to be condemned as they cannot be cleaned inside.

-The vehicle doesn't carry wading poles nor are crews trained to use them

-NOGSOP 2.1.4 section .03 states in the main Hazards section "unstable surfaces near to water as a hazard/risk" section 2.1.4.05 states "operating at flood incidents Hazards in flood water are, flood water, raised manhole covers, grids and submerged debris", section 2.1.4.07 "when operating at water rescue incidents ensure correct PPE is worn"

-If crews are wading then the life jackets will not be suitable in moving water.

Safety concerns regarding the training provided for emergency response drivers

For the majority of our drivers, they will have very little experience driving a vehicle under response conditions.

The training Hilux is unladen. Despite requests for the vehicle to be equipped, to safely replicate the vehicle in the training environment and aid tuition and assessment, this has not been actioned. Undoubtedly the vehicle will handle differently depending on the load and its distribution. This is a fundamental requirement of training under health and safety legislation and requires immediate remedy.

Many services are awaiting new legislation/best practice document, Section 19. When this is quality assured, it is likely that CFRS and Cheshire Police will be required to change the duration of driving courses and assessment criteria, including having to change our 2 day course to a 7 or even 14 day course. It would appear that there has been an organisational push to expedite the driving training to pre-empt this change which would explain why the vehicles have not been operational ready in the weight and engine size before employees have been taken out in them and have not received training or assessment in the controlled environment.

Another concern is the discovery that the principle and application of safe fending off at incidents is not taught on the driving tuition and assessment courses, but rather left to RTC courses or the E Learning platform. This is unacceptable and again requires immediate remedy.

Placing Cheshire Fire Fighters at unacceptable risk

We can see from the proposals that it is the intention of CFRS to mobilise these vehicles to all incident types. Yet this would be in breach of the array of Health and Safety legislation given that the hazards and risks have not been appropriately and suitably assessed, and that the appropriate training and equipment is provided.

It has been confirmed that unlike other CFRS emergency response vehicles, the RRRU's will not have any water carrying capacity or pump fitted. This means that under no circumstances may these vehicles be mobilised to incidents involving potential fire or radiated heat due to fire fighters having no firefighting media available.

The FBU have already raised our objections and made them clear in our response to the Authority's IRMP 20-24, and we have recorded some of those points in relation to deploying these vehicles and our members to road traffic incidents on major roads and Motorways.

We have already made the point clear that the RAC and the AA do not permit, following an assessment of risk, their employees to undertake roadside duties on motorways.

Cheshire Fire and Rescue Services own Standard Operating Procedure (SOP) states:

VEHICLE POSITIONING ON MOTORWAYS

Nature of Incident

The nature of the incident may influence the ICs decision to provide fend off in line or at an angle.

The requirement to provide a 2m working zone around any vehicles involved is paramount to the safety of personnel and, where access to all sides of the vehicle is required, may result in the closure of adjacent lanes.

It is also assumed that Police and/or Highways England are not in attendance on our arrival.

Where the incident is found to involve nothing more than a vehicle with overheated brakes or steam from an overheated engine etc, it may be appropriate to work from the nearside only without the need to close additional lanes.

The safety of personnel, including that of other emergency service personnel and casualties, will however remain paramount and the IC will implement the necessary control measures to ensure their protection.

Following an assessment of the risk, the repositioning of appliances may be appropriate as an incident develops when additional resources arrive at the scene. This should be considered when reviewing the following examples.

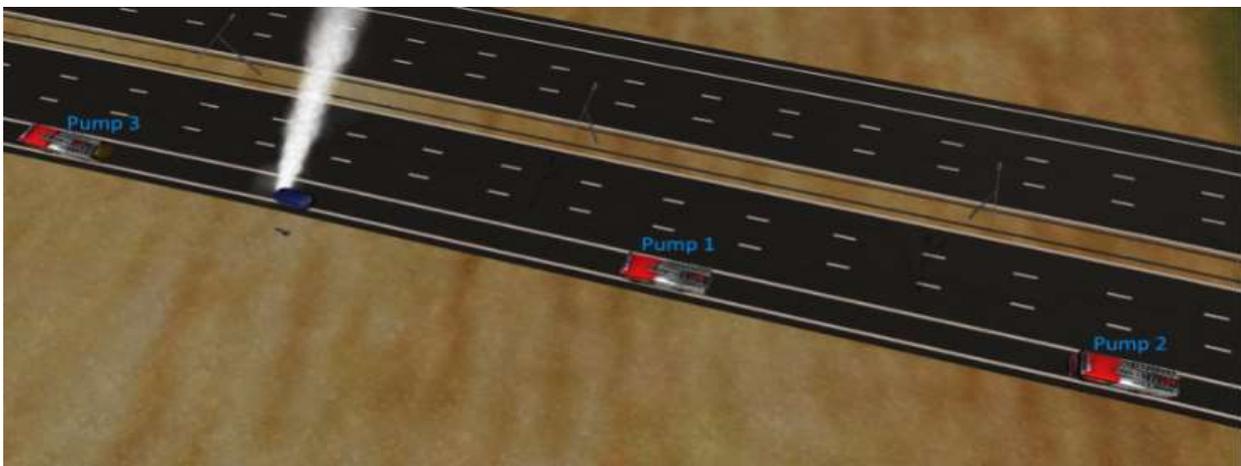
Fend Off

CONES ARE NOT TO BE USED ON MOTORWAYS

The diagrams provided below are examples only and are not designed to cover every possible incident type and should therefore be read in conjunction with the text provided.

Incident on the Hard Shoulder Only

In certain circumstances appliances can fend off 'in line' within the hard shoulder. This can be used when there is no requirement for crews to work near the live lanes. See below



For incidents on the hard shoulder which involve crews needing access all around the hazard zone then the appliance should fend off 'angled' from hard shoulder to lane 1. See below



The third appliance to arrive may be directed to take up a position to further secure and restrict traffic movement in the adjacent carriageway or take up a position beyond the incident and become the working appliance as directed by the IC.

Incidents in Lane 3 only

An incident confined to Lane 3 will in effect, be a mirror image of the example above and the IC will determine the most effective method of fending off in this situation. i.e.' angled fend off' as shown below.



Incidents involving Lane 1

The example shown below shows an incident affecting Lane 1 where the first appliance in attendance has been positioned at an angle to restrict the movement of traffic in Lane 1 and on the hard shoulder to avoid creating an 'island'.

The IC of this first appliance will need to carry out an assessment of the nature of the incident and the risk to personnel working adjacent to the live lane (Lane 2 in the example below) and within the 2m hazard zone detailed in 3.4.5 above.

The third appliance in the example below is shown positioned ahead of the incident. The IC will determine if this is appropriate and instruct the OIC of that appliance, by radio prior to arrival, if it is more appropriate to position this appliance further behind the incident to provide greater protection and early warning to oncoming motorists.



Incidents involving Lane 2

The diagram below provides a similar challenge which would result in all three live lanes being closed to provide an adequate level of safety for personnel working within 2m of the incident and Lane 1.

The IC will be required to make an assessment of the nature of the incident and risk to personnel and position appliances accordingly.



It is not uncommon for incidents on motorways to involve more than one lane and therefore require a greater level of traffic control to ensure the safety of all personnel at the scene. In such cases, there is a likelihood that traffic in affected lanes will be at a standstill and therefore create little risk to personnel.

Police and HATOs will however endeavour to reopen at least one lane as soon as possible to begin to relieve any backlog and the IC must liaise closely to ensure that suitable protection is afforded to personnel and to the scene as a whole.

It is not possible to provide examples of all potential scenarios within this SOP and ICs must use their professional judgement to carry out a thorough assessment of the risk and liaise closely with Police and HATOs to ensure that suitable and sufficient control measures are implemented.

Below you can see that another Fire and Rescue Service – West Midlands FRS, also prohibit the use of these same response vehicles to respond on Motorways. **The FBU will not accept our members be mobilised to Motorways in these vehicles.**

WEST MIDLANDS FIRE SERVICE

HS6

RISK ASSESSMENT FORM		Assessed by:		
Activity:	Diesel Toyota Hilux as a BRV BRV2 (second generation BRV) 5 new BRVs.	Name:	Job Title:	Roll No.
Location:	Academy/TEW	Mark Bishop	SHE Advisor	1200
Dept/Station:				
Date of Assessment:	17 th May 2013/22 nd May 2013 Updated on 19 th June 2013. Checked and updated by Mark Bishop and Dave Turner on 13 th March 2018			
Next Review Date:	March 2021			

SEVERITY (S)		Likelihood (L)					Risk Rating (RR) S x L = RR	
		1. Rare - The situation is well controlled	2. Unlikely - Well controlled, occasional lapses could occur	3. Likely - Incomplete controls	4. Very likely - Inadequate Controls	5. Certain No Controls		
1	First Aid only Minor injury	1	2	3	4	5	Low Risk 1 - 5	No further action required
2	Lost Time injury 1-3 days	2	4	6	8	10	Medium Risk 6 - 12	Action plan required and further controls implemented before proceeding
3	Over 3 Day injury	3	6	9	12	15	High Risk 16 - 25	Do not proceed consult SHE Team
4	Major Injury Fracture etc.	4	8	12	16	20		
5	Fatality/multiple injuries	5	10	15	20	25		

WEST MIDLANDS FIRE SERVICE

HS6

NOTES

Dwelling fires:

More than half (58%) of accidental dwelling fires are caused by cooking.

No firefighting is required at half (50%) of the accidental dwelling fires that the Brigade attends.

Three-quarters (75%) of accidental dwelling fires resulted in less than 1m2 of damage by direct burning.

Nearly three-quarters (71%) of the fires resulted in less than 10m2 of damage by fire, heat and smoke.

The type of fire fighting carried out at the fire gives some indication of the seriousness of the incident.

The fire fighting was minimal (no hose reels or main jets used) at a further 20% of fires. Hose reels were used in nearly a third of incidents (29%), and main jets at only 2% of incidents.

BRV - WMFS
A075 B065 C075 D085 D015 D025 D035 D095 - staffed by late crew
A025 A055 A065 B025 B055 C065 C095 D085 E055 E065 - staffed by core crew

Mobilising Criteria

The BRV has an attendance time of 20 minutes to fires in the open and those that are on open ground. A BRV has an attendance time of 10 minutes to AFA/Alarm incidents. As from 7th November 2012 they can be mobilised to all incident types, **apart from the exceptions listed below**, along with a PRL, if they are the closest resource.

BRV's should NOT be sent on for water relay as they have no hose coffins

Exceptions

- Motorways
- Aircraft Incidents
- Civil Disturbances
- MTPA
- Uniform Alphas
- All Haz Mats Incidents including Radiation and COMAH sites
- SSI/Police Markers
- Lift Incidents
- Large Animal Incidents
- Chimney Fires
- Railway Incidents inc Midland Metro

Safety concerns over the weight, stowage and handing of the vehicle

We know that a number of other Fire and Rescue Services have trailed these smaller concept response vehicles of which a number also used the Hilux model. A number of those services then withdrew the vehicles following safety issues which have included broken axle's, chassis, and road traffic accidents.



The image is a screenshot of a BirminghamLive news article. The headline reads "Fire service vehicle flips over at Witton traffic island leaving three injured". The sub-headline states "Crew was on blue lights training run when appliance crashed at traffic island in Witton". The article is by Brett Gibbons. Below the article is a photograph of a red and yellow fire service vehicle with "FIRE" written on the back. To the right of the photo is a "FLORYDAY" advertisement for clothing. Below the photo is a caption: "A West Midlands fire service response unit similar to the vehicle involved in the crash in Witton (Image courtesy)". Below the advertisement is a subscription banner: "When you subscribe we will use the information you provide to send you email newsletters. Your information will be used in accordance with our Privacy Policy." The main body of the article contains the following text: "An investigation is underway after three fire service staff were injured when an emergency vehicle overturned while on a training exercise in Birmingham. The Brigade Response Vehicle flipped over at a traffic island in Heathford Way in Witton yesterday afternoon at around 3.30pm. The appliance was travelling on blue lights with sirens but was not heading to an incident. A spokesman for West Midlands Fire service said it was on a 'simulated emergency journey.' No one was seriously injured and the three fire personnel travelling in the vehicle managed to get out before other crews arrived to assist. They received first aid from paramedics at the scene, and one was taken to the City Hospital in Birmingham for precautionary checks. No other vehicles or members of the public were involved. The spokesman added: 'Collisions involving our vehicles are rare. However, when they do occur, it is important that we learn from them to try to avoid a repeat and to keep our staff and the public as safe as possible. We will be carrying out an investigation into the full circumstances of this incident.'" At the bottom of the article are social media sharing buttons for Facebook and Twitter.

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Fire service vehicle flips over at Witton traffic island leaving three injured

Crew was on blue lights training run when appliance crashed at traffic island in Witton

SHARE    By Brett Gibbons

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An investigation is underway after three fire service staff were injured when an emergency vehicle overturned while on a training exercise in Birmingham.

The Brigade Response Vehicle flipped over at a traffic island in Heathford Way in Witton yesterday afternoon at around 3.30pm.

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No other vehicles or members of the public were involved.

The spokesman added: "Collisions involving our vehicles are rare. However, when they do occur, it is important that we learn from them to try to avoid a repeat and to keep our staff and the public as safe as possible. We will be carrying out an investigation into the full circumstances of this incident."

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Maximum authorised mass

Maximum authorised mass (MAM) means the weight of a vehicle or trailer including the maximum load that can be carried safely when it's being used on the road. This is also known as gross vehicle weight (GVW) or permissible maximum weight.

The effects of overloading a vehicle makes the vehicle less stable, difficult to steer and take longer to stop. Vehicles react differently when the maximum weights which they are designed to carry are exceeded. The consequences can be fatal.

The Road Vehicles (Construction and Use) Regulations 1986 require that "all parts and accessories and the weight distribution, packing and adjustment of their loads shall be such that no danger is likely to be caused to any person in or on the vehicle or trailer or on the road." All companies have a 'duty of care' under the Health and Safety at Work Act 1999 for the safety of employees at work. This means that an employer must do all they can to ensure the safety of that driver, including having policies in place to ensure that their vehicle is not overloaded. The Act also places a duty of care on the employer to carry out suitable risk assessments. The operator has a moral and legal responsibility which is shared with the driver of the vehicle.

2020 Toyota Hilux 2.4D4D Icon Auto axle weigh limits

The vehicle has a 5 Star Euro NCAP safety rating

WEIGHTS	SINGLE CAB	EXTRA CAB	DOUBLE CAB
Gross vehicle weight (kg)	2,730	3,010	3,040 – 3,080
Max. payload (kg)	820	1,050	1,045 – 1,060
WEIGHTS	S/CAB	E/CAB	D/CAB
Kerb weight (kg)	1,800 – 1,850	1,915 – 1,965	2,100 – 2,160(M) 2,095 – 2,155(A)

(Weight of vehicle without occupants or baggage)

Gross vehicle weight (kg) **3,210** Double cab

This allows for 1,055 kg load to include the following;

- All equipment
- Fire fighter weights in full PPE



Roll-over accident West midlands



Broken axle Staffordshire.

Staffordshire FRS have since scrapped these vehicles in 2016, as have West Yorkshire FRS in 2018 and the Scottish FRS in 2020.

W News - Local News

Firefighters called to fire see their own vehicle go up in flames

Safety warnings had been issued about the rural response pumps when they were first introduced

SHARE   By **Nino Williams**

16:35, 9 JUL 2017

UPDATED 08:41, 10 JUL 2017

NEWS



▶ The burnt out RRP (right) was attending to a fire in car, which was also destroyed (left). The ARP waits in the distance

They were supposed to be there dealing with a car fire.

But firefighters ended up seeing one of their own vehicles go up in smoke as well, and one of their number was claimed to have been injured in the subsequent explosion.

The vehicle which caught fire was one of a set which prompted safety concerns when they were introduced five years.

W READ MORE

▶ [Nine years jail for man who stabbed to death dad who thought he had cancer](#)

Called a rural response pump (RRP), it was called to the incident in **Pennard** together with Mid and West Wales Fire and Rescue Service's (MWWFRS) aerial rescue appliance (ARP) based in **Sketty**.

The large RRP accompanied the much larger ARP engine, which sometimes faces challenges from the narrow lanes in **Gower** and **Mumbles**.

But during the incident the RRP ignited, was consumed by fire and was claimed to have exploded four times, injuring one of the firefighters at the scene and leaving the vehicle a burnt out shell.

Seventeen of the vehicles were brought in to provide cover in rural areas, but following their introduction by the service in 2012, the Fire Brigades Union claimed they had been used to replace standard engines at some stations, and issued a 'safety critical notice' to MWWFRS because they claimed the vehicles were not fit for purpose.

Proposals to permit undertaking Dual Roles

The practice of carrying out dual roles – Officer in Charge and emergency driver is not permitted for structural appliances in CFRS and it cannot be permitted for RRRU's just because it's a smaller vehicle, - the fundamental rationale behind this is the same.

It should be clear that his practice has the potential to cause serious injury or worse to staff and members of the public because of wrong decisions which may be made due to the complexity of carrying out two separate roles without robust assessment of the risks the incident poses or failing to consider all the health and safety implications, as required under law.

What CFRS do permit – on a voluntary basis, - it cannot be required of staff, is that individuals may be the driver and one of the Breathing Apparatus wearers once in attendance.

Both of these roles are vitally important to ensure that crews can attend and operate at incidents safely and the FBU do not support this practice of combining roles in this way should be allowed to continue. Staff will recognise that this requirement places additional responsibilities at a time when conditions are often at their most hazardous.

Local and national procedures, road traffic laws and health & safety legislation and common sense outline a number of completely different separate specific tasks that must be undertaken by the Incident commander, the appliance driver and the Breathing Apparatus Wearer.

For example, the officer in charge will be gathering critical incident information, hazard information, and resource requirements, from which he/she will determine their operational plan and tactics along with their risk assessment. A briefing will be given to the crew. The driver will be primarily focusing on safely driving, maneuvering and siting the appliance. In addition, the driver will be ensuring he/she takes the optimum route to the incident taking account of the ever-changing environment, road and traffic conditions. The Breathing Apparatus wearer will be listening to the incident and hazard briefing and checking and testing their self-contained breathing set and equipment.

The agreed rolemap specifies that while undertaking this task the appliance drivers must continually assess the situation and work within his/ her and the vehicles limitations while adhering to road traffic law including the Highway Code, health and safety law and other legal requirements.

All of these considerations require a deal of thought and concentration in an environment that is likely to be changing rapidly. Then, on arrival, the OIC has to put all this planning into operation and ensure that the crew effectively and efficiently deals with the incident while prioritising the health and safety of the crew and the public.

The Service and the FBU already deals with a significant amount of disciplines related with driving and supervisory issues when they are performed separately. This practice can only increase the likelihood of issues if staff are subjecting themselves to this practice and associated risk when roles are combined in this way without full and appropriate planning, risk assessment and briefing. The FBU cannot be clearer that the performance of carrying out multiple or dual roles is unacceptable.

Frequently Asked Question's

1. An incident ground is an operational workplace and the law requires fire and rescue services to assess and reduce the risk to personnel as far as is reasonably practicable. As well as this duty of care to fire and rescue personnel, there is also a duty to safeguard others.

How can this be done robustly and effectively under these proposals with such limited initial responders?

2. Control measure: Measures to reduce the likelihood of exposure to a hazard from a given risk, and/or reduce the impacts of that exposure. The HSE hierarchy of risk control measures gives further examples of how control measures can be applied at an incident. The incident commander at the scene is the nominated competent person. They can delegate some responsibilities to others; however, they remain responsible for health and safety at an incident.

How will initial control measures and safe systems of work be put in place to protect the Health, Safety and Welfare of our members?

3. The Rapid Response Rescue Units will have no Water carrying capacity, source or delivery – what safe system of work / control measures will be available to be put into place to protect crews and casualties from fire or radiated heat?
4. Are crews on the RRRU's going to be expected to operate under operational discretion given the lack of resources – both people and equipment given the incidents types and scenarios are known and foreseeable? Operational discretion relates to rare or exceptional circumstances where strictly following an operational procedure would be a barrier to resolving an incident, or where there is no procedure that adequately deals with the incident. Clearly any use of operational discretion as a means to simply improve attendance times is not a proportionate or legitimate means.
5. The issue of dual role skillsets – Driver and OIC, Driver and BA – this is not compatible with level 1 WM7 training and validation where candidates are expected to demonstrate and be assessed on information gathering, planning and risk assessment on route to the incident.

Q	The aide memoir identifies products of combustion as a hazard, yet no firefighting media or control measure is proposed.
A	Products of combustion hazards will be managed through existing procedures what does this mean? This needs to be detailed in how this risk is to be managed and the actions undertaken trained for.
Q	The SOP and Risk assessment is silent on the spans of control at an Incident
A	The spans of controls will be managed through our CFRS incident command NOG SOP – what does this mean? Please provide details?
Q	There are inconsistencies in the scoring methodology, and with many activities being recorded as low when they should be assessed as medium and have additional control measures included.
A	The scoring methodologies for the RA and NOG SOP have been aligned
Q	The moral pressure to act needs to be assessed as a risk and control measures in put in place.
A	Officers in Charge (OIC) are trained and assessed in the challenges of moral pressure – this needs to be risk assessed, and control measures or safe systems of work put in place to eliminate, mitigate or reduce the hazard and risk. it is essential to avoid situations which could motivate or pressurise firefighters to act unsafely in the interests of saving life.” (Review of Standards of Emergency Cover - Technical Paper C – Response & Resource Requirements)
Q	What is the Respiratory protective equipment (RPE) that is stated as required?
A	OIC will select the appropriate PPE and RPE following their Dynamic Risk Assessment (DRA) and the implementation of safe systems of work. – Again no details, what RPE is available to individuals or teams on the RRRU’s, how will this be selected as appropriate and what systems of work will be put in place?
Q	The proposed methods of working proposed within the CFRS Standard operating procedure are plainly outwith the Fire and Rescue Service Manual, volume 2, Fire Service Operations – Incidents involving rescue from road vehicles, specifically - The role of the Fire and Rescue Service - The Crew approach - Effective Work Concept - The RCC MUO and HATO responsibilities
A	The Fire and Rescue Service manual, volume 2, Fire Service Operations has been superseded with the NOG SOP process to which we are aligned – Please provide the

	minutes from the National Operational learning User group where CFRS NOG SOP has been tabled and discussed?
Q	As per our response, the FBU require a full task analysis for all incidents that the RRRU's are proposed to attend. This should form part of the standard operating procedure and risk assessments. This should detail the roles and tasks that individuals are expected to undertake "Fire and Rescue services will need to provide evidence that the planned response is safe and appropriate. This is likely to involve carrying out detailed risk and task analysis of the planning scenarios" (Office of the Deputy Prime Minister 'Preparation for the Fire Service, Emergency Cover Toolkit')
A	The FBU supported the development of Task Analysis of RRRU in 2013. We are planning to run a further range of training scenarios, to which we will invite the Rep Bodies. Please provide the previous Task Analysis undertaken and agreement with the FBU from 2013.
Q	The training requirements and risk assessment for driver training of these vehicles has not been shared. The CFRS risk assessment has a severity rating of 5 (the maximum) for inadequate vehicle training, but the drivers trained thus far have done so in an unladen vehicle so do not know how the weight effects handling and capability, despite this being a recommendation by the Driver training Unit and the FBU.
A	The training RRRU vehicle now has the full inventory. Those staff previously trained on the un-stowed vehicle will have the opportunity to familiarise themselves with their stowed RRRU at station before the 'go live'. Opportunity is not sufficient, - training and assessment is required under the law and the regulations.
Q	The training package and risk assessment for driving the vehicle in water, and crews operating in water as proposed by the service has not been shared
A	The RA has been amended to specify water hazard
Q	The SOP and risk assessment does not include responding to incidents involving fire and or heat and what control measures and equipment are available
A	The purpose of the RRRU is in response to RTC and supplementary mobilising of staff to incidents. All incident risks, including those involving fire and heat, will be managed by OIC through existing NOG SOPs and RA – please provide the risk assessments for the incident types that the RRRU will be mobilised to , they cannot be completed under the purview of existing risk assessments given the crew size in responders is reduced, and the equipment available is different.
Q	The issue of mobilising these RRRU's is of serious concern to the FBU, both from NWFC without the appropriate incident knowledge and even more serious is the custom of

	<p>RRRU's self-mobilising to incidents in the case of Nantwich who have regularly self-deployed to property fires. The RRRU group have confirmed that it is the services intention is to continue with self-mobilisation. This practice must cease. Only by having agreed and risk assessed Pre-determined Attendance standards can we ensure the safety of the public and of crews responding</p>
A	<p>The mobilising software at NWFC will be configured to mobilise the RRRU to RTC incident types when it is showing as being available with sufficient crew in the Gartan Availability system. This does not require any specific knowledge by NWFC as it is incorporated within the Pre-Determined attendance.</p> <p>This is not the issue raised, the issue is self mobilisation which is unacceptable as all determined attendance is the responsibility of, and safety of North West Fire Control.</p>
Q	<p>Clarify the RRU attendance at Water/Wading incidents</p>
A	<p>The reference to wading in the RRRU driver training programme has been removed, those drivers already trained have been contacted to inform them of this change.</p> <p>Does this mean the RRRU will be taken off the mobilising lists for water incidents?</p>
Q	<p>The RRRU concept is to supplement the attendance at road traffic collisions where its smaller size will be an advantage on congested motorways and 4 x 4 capability a benefit in rural locations and inclement weather. Furthermore, it can be utilised by the officer in charge to 'supplement' other incidents with additional staff</p> <p>It is clear from this statement that CFRS expect that the RRRU will be first in attendance at motorway incidents leaving it with no suitable fend off.</p>
A	<p>This concept of RRRU is for it to arrive first to provide earlier life saving trauma care and scene management at RTCs. The OIC will command and control the incident to mitigate self deployment. At all other incident types the NOG/SOP is clear the RRRU will follow behind the appliances. The NOG SOP describes the positioning of the RRRU on motorways, including reference to the creation of islands, in it's contents and appendices</p> <p>How will a safe and appropriate scene of operations on the motorway be implemented?</p>
Q	<p>Appendix A & B show the use of cones on a motorway. The cones carried on Cheshire appliances are not suitable for use on motorways and should not be used as such</p>
A	<p>The inventory of the RRRU is being expanded to include traffic cones that meet the requirements for use on motorways</p> <p>Please provide details of what is proposed, and why is the service advocating acting outside of the current agreed standard operating procedure whereby cones are not to be used on the motorway for fend off?</p>

Q	<p>How does the driver dismount on the safe side when first in attendance as expected? How does the driver don their kit if first in attendance and no fend off in place? If as required the crew wait on the hard shoulder to prevent creating an island this will undoubtedly place them in even greater danger as drivers will be distracted by the incident risk veering on to the hard shoulder. This risk is further increased as highlighted in the document as most motorways are now ALR or SMART with a proven high risk to users. If the RRRU has to wait for other agencies or structural appliances to fend off before they can get to work then what is the benefit of them arriving first? This just adds to the moral pressure to act. The creation of an island section clearly recognises that the risk to crews in these situations is much higher yet we are sending crews into these situations and then having them wait in the risk area</p>
A	<p>The NOG SOP describes the positioning of the RRRU on motorways, including reference to the creation of islands, in it's contents and appendices. It states the RRRU is to be 'appropriately positioned' with the RA3 stating vehicle using fend off if necessary, -but the CFRS policy prohibits the use of fend off positioning using a rapid response vehicle and the SOP prohibits the use of cones?</p>



FBU Cheshire Observations to RRRU Scenarios

Background

On the evenings of Monday 1st November & Wednesday 3rd November 2021 FBU Cheshire were invited to observe the Rapid Response Rescue Unit scenarios held at Sadler Road Training Centre.

John Turner – FBU Health, Safety and Welfare Coordinator and Operational and Assurance Trainer for Cheshire Fire and Rescue Service observed both task analysis sessions.

The briefing sheet is included, please note scenario two was not used during either evening.

The scenario brief

To facilitate a variety of incidents that will test the response of the RRRU in the following areas:

- Initial attendance of RRRU with Driver/OIC and FF3,4&5 with further crew coming from same station in pump as part of PDA (2-4 riders) to accident in motorway/dual carriageway.
- Attend motorway incidents on the hard shoulder, lane 1,2 & 3.
- Attend a RTC incident on a A/B Road
- The scenarios are to vary in relation to flow of traffic, weather and time of day etc.
- Test the communication between initial RRRU in attendance with the only the commander and following pump with two competent fire fighters on board.
- Test what happens if failure to respond in following crews occurs. Whereby the lag time between RRRU and pump will be about 2 minutes.
- Initial attendance of RRRU with Driver/OIC and FF3,4&5 with rest of PDA coming from neighbouring stations –a approximate lag time will be about 5-6 minutes.

Common safety issues identified across both evenings

- Driver of RRRU exiting the vehicle into live lane on motorway contravening CFRS's RRRU SOP and NOG SOP 3.1.0 significant hazards, initial considerations, Operational Risk Assessment (ORA) and Appendix D
- RRRU crew members entering/working in live lanes of motorway contravening CFRS's RRRU SOP and NOG SOP 3.1.0 significant hazards, initial considerations, Operational Risk Assessment (ORA) and Appendix D
- RRRU drivers becoming drawn into incident without full PPE for incident contravening CFRS's RRRU SOP and NOG SOP 3.1.0 significant hazards, initial considerations, and Operational Risk Assessment (ORA) which has been questioned following images being posted on social media (@labaudiere)
- Fend off positioning creating an island between live lanes contravening CFRS's RRRU SOP and NOG SOP 3.1.0 significant hazards, initial considerations, and Operational Risk Assessment (ORA)
- RRRU drivers entering vehicles before they have been stabilised contravening NOG SOP 3.1.0 Hazard & control statement 3.1.0.04
- OIC of RRRU not taking extinguishing media when the recce incident contravening NOG SOP 3.1.0 Hazard & control statement 3.1.0.02
- **Lack of common identified officer in charge or agreed risk assessed tactical objectives**

Members expressed the following concerns: -

- RRRU drivers only receiving two days training when flexi Officers are required to undertake a weeklong driving course before they can respond in a car despite many already being EFAD drivers
- Members feeling exposed and vulnerable when attending motorway incidents due to lack of fend off, creating islands or having to wait in risk areas (lanes 1 & 4) on All Lanes Running (ALR) motorways until further resources arrive
- Undue stress due to only having two people in initial attendance
- **Moral pressure to act to make an intervention despite not having safe systems of control set up.**
- General feeling of being unsafe attending incidents on motorways & dual carriageways
- **The benefit of early attendance not outweighing the personal risk that individuals are subjected too.**
- Crews feeling exposed when waiting in vehicle in L4 or LI for additional resources
- **Crews unable to gather risks assessment, Standard Operating Procedure or initial actions and operational considerations on route due to no method of information exchange**
- **Crews unable to gather vehicle safety and hazard data due to no method of information exchange**
- **Crews unsure on procedures if vehicle involved in fire and or heat, or if environment is irrespirable.**

General Observations

- Lack of extinguishing media and the one small extinguisher carried stowed on offside of vehicle requiring access from live lane
- White scene lights require repositioning pointing downwards to avoid dazzling
- Ignition key requires removing for locker lights to work

-
- No cutting or spreading equipment carried to gain immediate access
 - Pull out equipment tray difficult to pull out
 - Pull out tray doesn't self-lock in locked position when closed
 - Pull out tray requires illuminating due to rear scene light being obscured by locker door
 - Ergonomics of stowage requires addressing especially if accessing from side locker doors
 - Trauma pack require more secure method of stowage currently using seatbelt which doesn't secure the bag
 - No suitable traffic cones carried as described in response to FBU questions previously asked and in compliance with highways.
 - Trauma bag sterile airways have been removed from packaging to stow in the bag
 - A lag time of two minutes used on some scenarios was unrealistic a more realistic time would be 5-6 minutes of attendance from own station
 - A lag time of 5-6 minutes of attendance from neighbouring station is unrealistic a more realistic time would be 10+minutes
 - The small benefits of early attendance do not outweigh the risks they create for crews
 - The Operational Risk Assessment (ORA) and NOG Sop 3.1.0 ORA have discrepancies in their scoring

We are concerned about the health and safety implications of this proposal. On this basis we draw your attention to some aspects of the relevant health and safety provisions that apply and write to raise specific questions about adherence to those standards.

Management of Health and Safety at Work Regulations 1999 (the '1999 Regulations')

Regulation 3(i) requires that:

- '3. (i) Every employer **shall** make a suitable and sufficient assessment of
- (a) the risks to the health and safety of his employees to which they are exposed whilst they are at work; and
 - (b) the risks to the health and safety of persons not in his employment arising out of or in connection with the conduct by him of his undertaking.

for the purpose of identifying the measures he needs to take to comply with the requirements and prohibitions imposed on him by or under the relevant statutory provisions and by Part II of the Fire Precautions (Workplace) Regulations 1997.'

Regulation 3(3) requires that:

'(3) Any assessment such as is referred to in paragraph (1) or (2) shall be reviewed by the employer or self-employed person who made it if-

- (a) there is reason to suspect that it is no longer valid; or
- (b) there has been a significant change in the matters to which it relates; and where as a result of any such review changes to an assessment are required, the employer or self-employed person concerned shall make them'.

Regulation 4 requires that 'where an employer implements any preventive and protective measures, he shall do so on the basis of the principles specified in Schedule I to these Regulations'. Those principles set out in Schedule I to the 1999 Regulations include the following:

- (a) avoiding risks;
- (b) evaluating the risk which cannot be avoided;
- (c) combating the risks at source;
- (d)
- (e)
- (f)
- (g) developing a coherent overall prevention policy which covers technology, organisation of work, working conditions, social relationships and the influence of factors relating to the working environment;
- (h) giving collective protective measures priority over individual protective measures; and
- (i) giving appropriate instructions to employees'.

Regulation 10 requires that:

'10. Every employer shall provide his employees with comprehensible and relevant information on-

- (a) the risks to their health and safety identified by the assessment;

-
- (b) *the preventive and protective measures;*
 - (c) *.....*
 - (d) *.....*
 - (e) *.....*

Regulation 11 requires that, where two or more employers share a workplace both shall cooperate and coordinate their activities regarding compliance with relevant health and safety obligations, and each shall take all reasonable steps to inform the other of the risks to their respective employees' health and safety occasioned by the activities of their employees.

It is clear that the following obligations (as a minimum) apply to the current situation by virtue of the above provisions:

- 1. the circumstances of the introduction of the new RRRU vehicles amount to a significant change to the matters to which previous risk assessments will have applied for the purpose of Regulation 3(3);*
- 2. your organisation was, and continues to be, subject to an obligation to conduct risk assessments, review existing risk assessments in light of the introduction of RRRU vehicles and make any necessary changes occasioned by it to those risk assessments;*
- 3. the risks and preventive measures to be taken must be implemented according to the principles in Schedule 1, and in particular the principles of avoiding risks, evaluating risks which cannot be avoided, combating the risks at source and the development of a coherent overall prevention policy;*
- 4. CFRS is required to provide its employees with clear and comprehensible information as to the risks to their health and safety identified by those assessments and the preventive and protective measures taken.*

Consultation obligations

In addition to the obligations referred to above, there are also the obligations of consultation under the Safety Representative and Safety Committee Regulations 1977 and the Health Safety (Consultation with Employees) Regulations 1996.

Compliance with relevant health and safety standards and legislation

Compliance with these relevant health and safety standards and legislation can only be achieved through the satisfactory answers to the following questions:

- 1. what risk assessments have been carried out for the purpose of the 1999 Regulations since the decision to introduce 13 new RRRU vehicles at each primary on-call fire station?*
- 2. what measures were identified as necessary for compliance with the requirements and prohibitions imposed by health and safety legislation arising out of the decision to introduce 13 new RRRU vehicles at each primary on-call fire station?*

-
3. *what reviews of any previous risk assessments for the purpose of Regulation 3(3) of the 1999 Regulations have been carried out since the decision to introduce 13 new RRRU vehicles at each primary on-call fire station, and what changes to pre-existing risk assessments have been occasioned by them?*
 4. *Please provide copies of the outcomes of all risk assessments, and reviews of pre-existing risk assessments, undertaken by virtue of the risks posed by the introduction of 13 new RRRU vehicles at each primary on-call fire station;*
 5. *arising out of those risks assessments, and reviews, undertaken for the purpose of assessing the risks associated with the introduction of 13 new RRRU vehicles at each primary on-call fire station, what preventive measures were identified as appropriate, have all of them been implemented? If some or all of such measures have not been implemented, why is that?*
 6. *what information has been provided to employees concerning the risks identified in the risk assessments and reviews undertaken for the purpose of the 1999 Regulations and the preventive and protective measures recommended and implemented as a result*

Means of enforcement

Members of the FBU in Cheshire will regard failures to comply with the obligations set out above not only as breaches of the relevant statutory instruments, but also as breaches of the duty of trust and confidence implied into their contracts of employment as well as the implied obligation to provide a safe place and a safe system of work. All the rights of our members remain reserved in this regard.

The FBU require a full and detailed response to our submission on the RRRU proposals, submitted to the chair of the working group.

**A position paper on the workplace facilities provided in
Cheshire Fire and Rescue and a look to the future that
provides dignity, equality and respect**



**FIRE
BRIGADES
UNION**

CHESHIRE

Mark Cashin – CFO, CEO and Chair of CFRS Equality Steering Group

CC all members of the Equality Steering Group

Dear Mark,

Motion to the Equality Steering Group – CFRS changing and toilet facilities to be gender specific

I write to you on behalf of women fire fighters in my role as the FBU Cheshire Women's representative following a large number of complaints from our members, although these issues have also been raised by our male members and should not be considered a female specific issue.

Background

CFRS under the leadership of the previous Chief Fire Officer, Paul Hancock, decided to pursue a policy of unisex changing and wash facilities. We do not believe this was undertaken with any meaningful consultation of our employees.

Over the past 3 years a number of staff have raised grievances, informally and formally in response to these workplace provisions. Consultation with our members has shown that the overwhelming majority of staff do not support these facilities and further that they feel they impact on individual dignity at work, confidence and a general consensus of feeling uncomfortable.

These workplace facilities are not supported by the Fire Brigades Union, in many cases facilities may not comply with the Health and Safety Executives guidance (HSE) and most recently Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) have also made clear they expect services to provide gender specific facilities.

Members of the Steering Group should also note that the workplace and culture has evolved since this Cheshire policy was implemented – Cheshire Fire and Rescue have worked incredibly hard in collaboration with the FBU on contaminants, and both national and local reports produced have introduced guidance that staff should shower after incidents and before leaving the workplace to reduce the effects of toxins and carcinogenic pollutants, - yet at the same time as issuing this guidance and change in workplace culture we have moved to reduce the facilities available.

How and where are staff from an on-coming watch/team going to get changed into their working uniform when the off-going watch/team are in POD's showering, when only 3 PODS are available for up to 10 staff at change over?

A member has reported of one occasion, on her very first drill night she experienced a "flooding" episode (later diagnosed as a fibroid). This happened out on the drill yard, being new and a woman she felt unable to excuse herself for fear of making a bad impression on her new colleagues. Afterwards she needed time to clean up her duty rig and PPE which were both blood soaked before she was able to rejoin the watch in the office. She expressed relief that the female specific facility allowed her to attend to this in private without fear of "hogging" what would now be the joint facilities for an excessive amount of time, and also without fear of someone banging on the door asking how long she'd be.

Another example that was brought to our attention was a young in service female who needed to change sanitary products in a pod, and when going from her unisex locker area to the cubicle/pod, dropped tampons on the floor in front of male colleagues, causing her to feel deeply embarrassed. This is completely avoidable. No member of staff should have to come to work and be put in an avoidable situation that leaves them feeling distressed and embarrassed. The opposite should be true, every member of staff should be able to come to work feeling valued, confident and ready to thrive in their role.

Ultimately, whilst this vision by the former CFO may have been made in good faith and with good intentions, it has had a quite negative effect on staff. At a recent Fire Authority meeting and in response to a consultation submission to the Integrated Risk Management Plan (IRMP), a female elected member was quite clear that the views of females and all staff on facilities should be heard and acted upon. Staff have been raising concerns with regards the use of unisex pods for 3 years and no one seems to be listening.

The facilities expected by staff were detailed within the comprehensive report by Cheshire FBU in response to the IRMP.

We call on the service management to live by our own core values – 'doing the right thing', putting people first, 'Act with compassion' and provide facilities that staff want and that afford dignity, decency and comfort.

Motion

The Equality Steering Group agrees that the service should now provide gender specific facilities. In doing so, we recognise the wishes of our staff, our most important asset, and the effect that current and planned workplace facilities are having on our employees.

In considering our staff's wishes, their mental health, reports from stakeholders and partners alongside the changing face of the emergency response role and culture we move to recommend to the senior management team and the authority that gender specific facilities are programmed for all CFRS service premises and a timetable for works to be published.

Ends

Many thanks and kindest regards,

Jo Collier-FBU Women's Representative

Dawn Morris-FBU Sectional Representative Chair

Hannah Smith-FBU Fairness at Work Coordinator

Monique Hollinshead-FBU On-Call Women's Representative



THE PROFESSIONAL VOICE
OF YOUR FIREFIGHTERS

Cheshire FBU

Station Facilities

This document shows the differences in facilities for On Duty Personnel at Fire Stations in the UK.

The vast majority have been adapted, changed or implemented following discussions with the staff that use them 24/7 to ensure they meet all the current requirements and where practicable follow the FBU Best Practice Guidance Document for Station Facilities.

[Minimum Workplace Facilities, Best Practice | Fire Brigades Union \(fbu.org.uk\)](https://www.fbu.org.uk)

The document draws from a varied cross section of UK Fire and Rescue Services from the largest Metropolitan FRS's to more rural FRS's. The common theme is one where other FRS's place great emphasis when pursuing a station modernisation program on the dignity and respect for individual privacy through the provision of individual rest/study rooms.

Standard North Wales WT Station Facilities

Most NWFRS WT stations have been upgraded over recent years and in the case of Wrexham are a relatively new build



Communal corridor off which single, none gender specific personal rooms are provided. (Deeside NWFRS)



Single resting platform with study desk and 4 x personal lockers

Standard Hampshire WT Facilities



Single private room with resting platform, toilet and personal locker and changing space.



Basingstoke Fire Station.

Single Toilet and wash facilities for use by female FF's separate to both locker room and rest room.

Male facilities are 3 separate showers with urinal blocks.

All planned refurbishments to follow similar layout.

Hereford and Worcester Standard WT Facilities.



Standard H&W WT station facilities, single occupancy locker/change/rest room.

Wash facilities are single toilets and showers

Stroud Gloucestershire WT Station Facilities



Communal corridor



Single occupancy rooms with personal locker space and resting platform

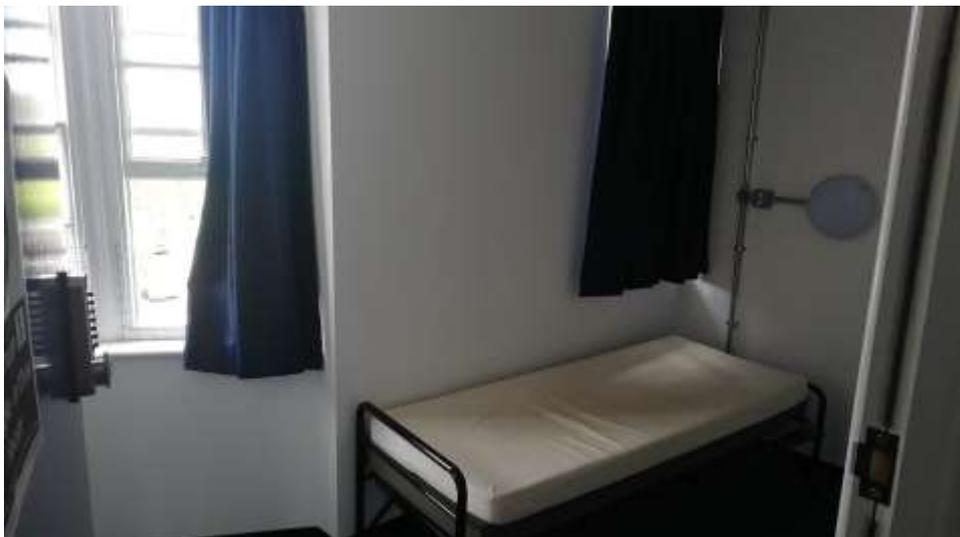


Separate single wash and toilet facilities off communal corridor.

Stroud which is an old 1960's fire station. Previously this was an open dorm, then partitioned off. Latterly during covid they've been made into proper individual rooms the toilets/showers are separate. The women's facilities were previously below standard but have now been modernised offering two new separate shower/sink/toilet rooms.

This demonstrates what can be achieved when refurbishing older stations to meet the demands of a more diverse workforce.

London Non-PFI Standard WT Facilities





Single Rooms are offered on a number of Non-PFI stations in London with en-suite facilities available. PFI stations have communal rest rooms but separate wash and change facilities.

Tyne and Wear FRS Standard WT Facilities





Individual Rest/Locker rooms and study area, wash facilities are separate across majority of stations.

Memory foam mattresses available to aid musculoskeletal posture.

Merseyside FRS standard shift station facilities.





Individual rest/study rooms some of which have fold away resting platforms to enable multifunctional use of room. Desks provided for private study or personal space.

Separate individual wash/toilet facilities available on most stations.

Other station facilities for use by on duty staff include balconies to enjoy open space and fresh air which aid mental wellbeing.

Cheshire Traditional Stations awaiting Refurbishment.





Three pictures showing separate changing and wash/toilet facilities for male staff. This is separated from a communal corridor by two doors and has previously been refurbished to provide individual shower pods.



Separate Male toilets and wash room on first floor of traditional Cheshire station. Separated from communal corridor by single door, toilet has lockable door.



Female locker room off the female wash and toilet facilities including feminine hygiene product bins accessed via communal corridor. Separate female facilities offer dignity and privacy to staff.

New Cheshire Facilities Standard-Multi Appliance WT Station

Over the last five years Cheshire has built four new WT stations based around the same design but with varying degrees of success, the first three continually suffer with poor build quality and cramped staff accommodation in terms of both work and rest areas. All of the new stations and more recently the ones that have been refurbished have had 'pod' style wash and change facilities built and communal locker rooms that are without exception small and overcrowded with only a single door separation onto toilet and shower pods exposing staff to uncomfortable smells and a generally damp environment due to poor design and ventilation.

The following photographs are of the newest station to be built at Chester where a large open plan locker room has toilets directly off the main room but the addition of four dry change rooms. One corner of this locker room has been given over (although no physical separation) to four female lockers. This has not been possible at other newly built stations due to the size limitations of the staff accommodation.





Pod design wash and toilet room separated by single lockable door straight off communal locker room. Like other new build stations these pods become very busy particularly at shift change times when they struggle to cope with the demand and capacity with larger number of staff both showering and wishing to use toilet facilities, the floors become wet and ventilation system overwhelmed.



Dry change cubicles, this space would have been better utilised creating separate M/F locker rooms and facilities.