

- 2.8. Prior to commencing the consultation, the Service engaged with the Consultation Institute (a well-established, not-for-profit best practice institute promoting public and stakeholder consultation in the public, private and voluntary sectors). The Institute quality assured the proposed consultation methodology thereby enabling the Service to proceed with confidence and demonstrate to interested parties that independent evaluation had been sought. Subsequently, the Institute has issued the Service with a certificate of consultation readiness which is now attached as Appendix A to this report.

### **3. CONSULTATION RESPONSES**

- 3.1. In total, 3,818 responses were received:

- 3,232 completed questionnaires;
- 205 written submissions; and
- 381 email responses.

In addition, five petitions were submitted with a total of 43,644 signatures opposing the proposals.

- 3.2. Due to the large volume of responses and following public feedback the Service engaged an independent organisation, Opinion Research Services (ORS), to collate and theme the consultation responses.

- 3.3. The full ORS report is available as a background paper to this report. The summary ORS report is attached at Appendix B to this report. This summary themed responses through both the text comments provided on consultation questionnaires and the written responses received by the 6 individual elements. The emerging themes were:

- Negativity around the majority of station closures, mainly due to slower response times
- No strong opposition on the removal of second and third appliances
- Aggregation of options 1-6 may have compounded negativity to other options
- Some limited support for roving vehicles with more information requested on how the model works

- 3.4. It should also be noted that ORS expressed a different view to that expressed by the Consultation Institute regarding the way in which the options were presented. This shows that there are varying professional views on consultation methodology. The Consultation Institute advises that, from its experience, issues likely to be found unpalatable by consultees will inevitably be criticised no matter how any options on those issues are presented. The Service acknowledges that the options were likely to cause an emotional response but nonetheless is confident that the consultation undertaken met the key principles of consultation (also known as the Gunning Principles) and that members of the public, staff and stakeholders were afforded the opportunity to express their views. The views so expressed have been subject to thorough analysis and used to further shape Service thinking.

- 3.5. The Service was keen to support alternative options suggested by staff in line with its vision of 'involving communities and colleagues in designing our services.' The Service was pleased to receive responses that showed an appreciation of the objectives of the proposals whilst supporting pragmatic and realistic alternatives. Key suggestions advanced during the consultation period were:

- For the Service to try all possible options before considering closure;

- To adapt the Whole-time duty system to release resources rather than day crew stations;
- To consider alternative crewing models to keep the appliance available, such as crewing fire appliances with fewer than four riders;
- To replace some larger, traditional fire appliances with smaller Rapid Intervention Vehicles that can be crewed with fewer staff;
- To merge some stations that are close together rather than close them; and
- For staff to be able to volunteer as an alternative to closing a station.

#### **4. HER MAJESTY'S INSPECTORATE OF CONSTABULARY AND FIRE AND RESCUE SERVICES (HMICFRS) REPORT 2018 - 2019.**

4.1. In June 2019, HMICFRS undertook an inspection of the Service and publicly reported its finding in December. In relation to the effectiveness and efficiency of the Service's current Service Delivery model, HMICFRS formed the following conclusions:

- The Service should improve the availability of its on-call fire engines;
- The Service should improve performance against its response standards;
- The Service needs to assure itself that its prevention, protection and response resources are allocated to where they have identified the risk; and
- The Service needs to establish if operational crews are productive and used efficiently to support prevention, protection and response activities.

#### **5. EMERGENCY RESPONSE STANDARDS (ERS)**

5.1. The Service's current response standard of the first appliance being in attendance within 10 minutes for a house fire and 15 minutes for a road traffic collision was set out in the "Devon and Somerset Corporate Plan 2008/09 to 2010/11" and agreed by the Authority following public consultation. At the time this standard was agreed, it was estimated that around 80% of the population could theoretically be reached within the 10 minute attendance time. This was based on the existing fire station locations and that the fire appliance would be available 24/7. Whilst it was not intended (or indeed possible) to be able to reach everyone within this time period, it was recommended that a single response time for attendance (regardless if a house is in a rural or urban area) be an aspiration; "we should aim to make a first attendance in 10 minutes with all resources arriving within 13 minutes". Appendix C shows the areas where the 10 minute (dwelling fire) and 15 minute (road traffic collision) Emergency Response Standards could be achieved based on existing fire station locations.

5.2. During its inspection, HMICFRS benchmarked performance against other fire and rescue services and it compared the first fire appliance response times. Those services that have been graded as 'good' in the effectiveness category have been able to clearly demonstrate good average response times together with their performance against their agreed response standards (expressed as a target percentage).

5.3. HMICFRS reported that "In the year to 31 March 2018, the Service's average response time to primary fires was 10 minutes and eight seconds. The service's average response time is quicker than the average for other predominantly rural services (10 minutes 32 seconds in year to 31 March 2018)".

- 5.4. However, because the Authority has not set a target percentage performance measure by which it is able to hold the Service to account, HMICFRS reported that the Service only met its response time for the first attending appliance to a dwelling fire incident on 72.4% of occasions and on 75.4% of occasions for Road Traffic Collisions. Compared to other predominately rural services, the Service's performance is good but the absence of an agreed target percentage measure resulted in HMICFRS assessing the Service's performance against 100% of incidents, resulting in the Service receiving a lower performance rating than other fire and rescue services that had lower levels of response times. It can clearly be seen from the ERS map at Appendix C that it is not possible to meet the agreed aspirational response times on all occasions i.e. 100% of the time.
- 5.5. It is therefore recommended that, should the Authority agree to the new Service Delivery Operating Model, the existing response standards should be maintained and that in addition an explicit performance target for meeting the first appliance attendance times for both incident types (house fires and road traffic collisions) on 75% of all occasions should be set. Performance against this measure would then be publicly reported through the Audit & Performance Review Committee.

## **6. PROGRESS AGAINST INTEGRATED RISK MANAGEMENT PLAN AND FIRE & RESCUE PLAN**

- 6.1. Since the public consultation was launched in June 2019 the landscape has changed for the Service:

### ***On-call terms and conditions***

- 6.2. Discussions with staff and their Representative Bodies (the Fire and Rescue Services Association (FRSA) and the Fire Brigades Union (FBU) have culminated in an 'in principle' agreement for a new On-call duty system that pays for availability by the hour, enhancing the pay of firefighters. This level of payment has previously been trialled across the Service and the results have shown increased availability of appliances. Academic research validated by the University of Gloucester in September 2019 has indicated that an increased payment would also improve retention of staff. Current levels of staff turnover costs the Service approximately £1.5m each year.
- 6.3. The proposed new 'Pay for Availability' duty system removes the need for a defined level of establishment, i.e. the number of On-call staff required at each fire station. This is because payment by the hour is only for the exact number of firefighters required to crew the fire engines. Staff will have freedom of choice and flexibility in how many hours of cover they provide. The cost of delivering the pay for availability system is therefore dependent upon the number of firefighters required to maintain availability of the specific number of fire engines required at any one time across the Service. Adopting the 'Pay for Availability' duty system would be a large net investment for the Service of £1.8 million (representing a 16% increase to the On-call budget).
- 6.4. However, evidence gained from trials within this Service demonstrated that 'Pay for Availability' significantly improved appliance availability and the emergency response service to our communities. During the trials the average availability of the seven fire engines that were trialled increased from 81.7% to 91.6%, a 10% improvement in availability. This also resulted in a corresponding decrease in risk in those areas. The 'Pay for Availability' duty system is a key enabler for the introduction of a variable, risk-based fire engine availability model that is detailed in section 9 below

### ***Aggregate crewing***

- 6.5. Feedback from staff and through research projects indicate that On-call Firefighters want to be available to attend incidents in their area and to have the opportunity to earn more money. The Service is currently in discussions with trade unions for some fire engines to be crewed with fewer than four firefighters to keep the appliance available, with these firefighters being paid the new hourly rate.
- 6.6. The Service has been successfully trialling aggregate crewing at two stations, Porlock since August 2015 and Princetown since Sept 2016, because the firefighters were frustrated by the fire appliance being made unavailable as a result of failure to achieve the minimum crewing level of four firefighters. Since implementation of aggregate crewing, these two stations have increased the availability of the fire appliance by riding with two or three firefighters. During the trial period the fire appliances at Porlock and Princetown were able to attend more incidents (20% Porlock and 30% Princetown). These are incidents that they would not have been able to attend prior to the use of aggregate crewing. While it remains an aspiration to have fire appliances crewed with a minimum of four firefighters it is not always possible to achieve this due to the difficulty of recruiting and retaining sufficient numbers of On-call firefighters, particularly in less populated communities. The FRSA has agreed in principle to adopt aggregate crewing and talks are continuing with the FBU.

### ***Whole-time***

- 6.7. The Service has also been discussing possible changes to the existing Whole-time rota system with staff. Whilst the Day Crewing option presented in the consultation is supported by the Authority's Integrated Risk Management Plan, the Service has been discussing an alternative working pattern with representative bodies that could provide more flexibility for firefighters and at the same time release capacity (comparable to the Day Crewing option) to support the delivery of increased prevention and protection work and enhance the emergency response to incidents. Under this alternative working pattern, day duty firefighters would use roving vehicles to carry out work that would increase preventative activities by a minimum 50,000 hours per annum. Although no formal agreement is in place with the FBU at this time, the Service is encouraged by the willingness of the FBU to continue discussions and remains optimistic that a new duty system agreement should be reached by the end of the financial year.

### ***Medium Term Financial Plan***

- 6.8. The Authority's Medium Term Financial Plan for 2020-21 identified a potential funding gap of between £5.3m and £7.8m for 2020-21, which included a projected reduction in grant funding of 5% and pension cost pressure of £3.9m. This meant that resources would need to be reallocated to meet risks and invest in key areas of improving On-call availability and Prevention and Protection work.
- 6.9. In December 2019, the Provisional Local Government Finance Settlement showed that grant funding will increase by 1.7% in line with inflation and the Home Office confirmed that the Government will partially fund pension cost pressures, meaning that the overall financial picture has improved for 2020-21.

- 6.10. The effective and efficient delivery of prevention, protection and response services is the most critical element of the Service. Whilst the future remains uncertain, the Service is committed to improving performance through innovative practices such as 'Pay for Availability,' and seeks to fund the investment required by using Reserves in the short-term. Further work will be needed to identify the savings required to fund the investment beyond the short-term and a new Medium Term Financial Plan will be developed as part of the 2020-21 budget preparation to be considered by the Authority in February 2020.

## 7. **OPTIONS APPRAISAL**

### ***'Do Nothing'.***

- 7.1 Whilst doing nothing is an option, it will not address the drivers for change as outlined within the Integrated Risk Management Plan, or the improvements as outlined in the HMICFRS report and is therefore not recommended for consideration.

### ***'Options 1-6' of original consultation.***

- Option 1:** Close Appledore, Ashburton, Budleigh, Colyton, Kingston, Porlock, Topsham, Woolacombe
- Option 2:** Option 1 plus Remove 3rd appliances from Bridgewater, Taunton, Torquay & Yeovil
- Option 3:** Option 2 plus Remove 2nd appliances from Crediton, Lynton, Martock & Totnes
- Option 4:** Option 3 plus Day crew Barnstaple, Exmouth & Paignton
- Option 5:** Option 4 plus Move to night cover only on second appliance at Brixham, Chard, Dartmouth, Frome, Honiton, Ilfracombe, Okehampton, Sidmouth, Tavistock, Teignmouth, Tiverton, Wellington, Wells & Williton
- Option 6:** Option 5 plus Introduce 6 roving appliances

- 7.2 Whilst the underpinning risk and evidence presented in the consultation remain valid, it is clear that the extent of station closures and day crewing is not something that many who responded to the consultation wish to see progressed at this stage. Respondents, particularly in more remote communities, were concerned about extended response times and suggested that prior to any changes being agreed, the reliability of the 'On-call' system should be improved. Respondents also suggested that an assessment of other approaches, such as merging of fire stations, should be considered before station closures were made. Discussions with the trade unions have been progressive and the Service remains optimistic that agreement will be reached that will allow for new ways of working to be introduced by the end of this financial year. The agreement will bring about improved availability of our fire appliances, a significant increase in the level of preventative activity and greater emergency response resilience. Consequently, the options 1 to 6 as consulted on are not recommended at this stage.

### ***Option 7***

- 7.3 The purpose of consultation is to listen to views and consider alternative approaches. Having done this, a revised model is now presented for consideration by the Authority.

7.4 Given the alternative options put forward by staff and the new ways of working agreed in principle with trade unions, together with the strong feedback from the public and other organisations, the following option has been developed for consideration by the Authority. This can be considered as 'Option 7' as it is made up of components from the June 2019 consultation "mix and match" option. The various elements of Option 7 outlined below will address the risks outlined in the Integrated Risk Management Plan as well addressing many of the areas for improvement identified by HMICFRS in terms of improving efficiency and effectiveness. Future Integrated Risk Management Planning will not preclude any of the original options being brought forward for review.

7.5 Option 7 is derived from the options consulted on and the consultation responses and aims to strike the balance between driving reform and enabling reallocation of resources to risk, specifically providing more prevention and protection activity. The model demonstrates how we have used public responses as part of the consultation– this will build further trust and confidence in the approach when the public and staff are next asked for their views. Effectiveness and efficiency will be improved, as whilst there will be fewer fire stations and fire appliances, those that remain will have better availability and be more resilient. This, in turn, will enhance prevention, protection and response performance. It is anticipated that the improved terms and conditions for firefighters will have a positive impact on the 'People' areas identified in the recent HMICFRS report.

## 8. OPTION 7 SUMMARY

- Defer the decision to implement day crewing at Barnstaple, Exmouth & Paignton, **subject to** a revised 24/7 crewing model being agreed with the Fire Brigades Union, including roving appliances, before the end of the 19/20 financial year.
- Close Budleigh Salterton fire station and allow affected firefighters to respond from Exmouth fire station.
- Relocate Topsham fire station to Service Headquarters with one fire appliance and relocate one of the fire appliances to Middlemoor fire station (both fire appliances to be relocated to Service Headquarters until an On-call crew can be established at Middlemoor).
- Remove the third fire appliances from Bridgwater, Taunton, Torquay & Yeovil
- Remove the second fire appliances from Crediton, Lynton, Martock & Totnes
- Introduce variable fire appliance availability dependant on risk

## 9. OPTION 7 DETAIL

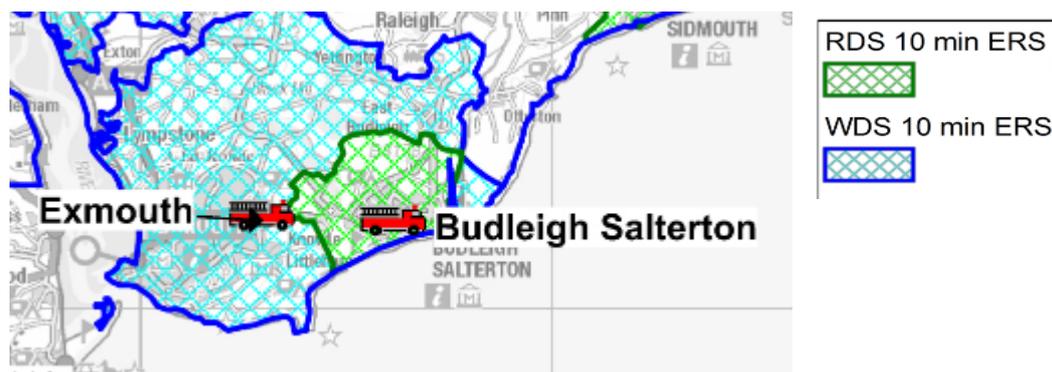
### ***Introduction of new shift/rota instead of moving Exmouth, Paignton and Barnstaple to day crewing.***

9.1. Rather than move to a day crewed system for Exmouth, Paignton and Barnstaple, positive discussions with representative bodies indicate that an alternative Whole-time shift and a new Day Duty shift would result in the Service significantly increasing staff productivity in prevention and protection activity. Therefore, any decision to move to a day crewed model can be deferred until the end of the 2019/20 financial year. In the event that it is not possible to reach agreement with representative bodies to a new way of working the option of moving to a day crewing arrangement will be reconsidered post April 2020.

- 9.2. This proposed alternative shift system will improve the productivity of firefighters across the Service and will maintain 24/7 operations at the three fire stations. Response times and risk will be positively affected as increases in preventative work will reduce risk and the increased availability of firefighters during the daytime will provide for improved emergency response resilience at times when On-call availability is at its lowest.
- 9.3. The proposed alternative shift system would also directly support the use of 'roving vehicles'. These roving vehicles would not be additions to the fleet but would be existing vehicles, some of which are those identified 2nd fire appliances that are not risk prioritised during the daytime. This approach, as consulted on, will ensure that additional operational staff are available during the day to respond to emergency calls whilst significantly increasing the volume of prevention and protection activity.

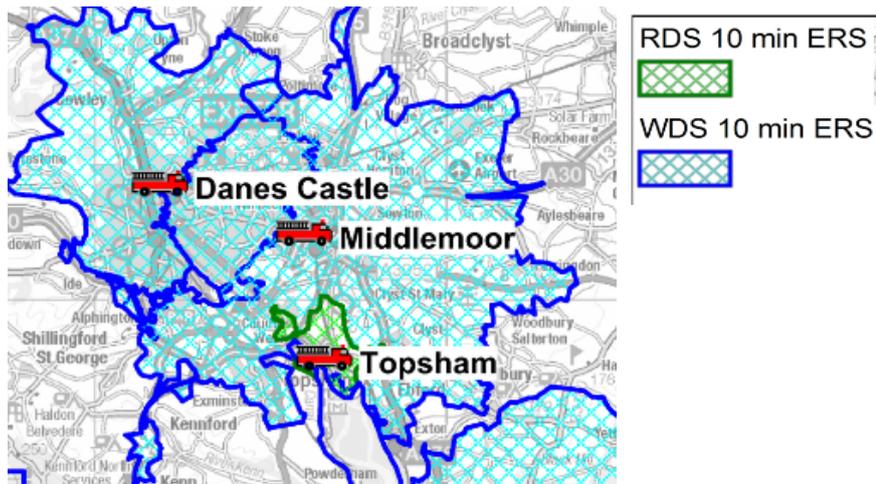
**One fire station closure and one fire station relocation**

- 9.4. **Close Budleigh Salterton fire station.** As the response area for Budleigh Salterton fire station falls completely within the 10 minute emergency response area of Exmouth fire station (see map below), it is proposed that Budleigh Salterton fire station is closed and existing firefighters from Budleigh Salterton respond instead to Exmouth fire station. Under this proposal, the fire station at Budleigh Salterton will be sold and one fire appliance removed. It is not anticipated that this proposal will result in compulsory redundancies being necessary.



(RDS stands for Retained Duty System, now known as On-call. WDS stands for Whole-time Duty System)

- 9.5. **Relocate Topsham fire station.** As the response area for Topsham fire station falls completely within the 10 minute emergency response area of Middlemoor fire station (see map below), it is proposed that Topsham fire station site is closed and the appliances and firefighters are relocated. Under this proposal Topsham fire station will be sold and one of the fire appliances relocated to Station 60 (Service Headquarters) in Clyst St George. The other fire appliance from Topsham would be located at Middlemoor fire station (Exeter) as soon as a new 'On-call' crew can be recruited or existing Topsham staff relocated. In the meantime, both fire engines would be located at Station 60. There would be no reduction in the number of fire appliances under this option. Response times during the working week will improve further as 'On-call' Firefighters who work in other roles at Service Headquarters would be able to respond immediately rather than having to travel to the existing Topsham fire station first. It is not anticipated that this proposal will result in compulsory redundancies being necessary.



(RDS stands for Retained Duty System, now known as On-call. WDS stands for Whole-time Duty System)

9.6. **Other Stations:** Appledore, Ashburton, Colyton, Kingston, Porlock and Woolacombe would remain open under this proposal but will be subject to periodic review. The payment for availability for 'On-call' staff that has been agreed in principle with trade unions will improve availability of 'On-call' fire appliances. It is also agreed (with one trade union and discussions ongoing with another) that 'aggregate crewing', where firefighters can be sent to incidents with fewer than four firefighters, be adopted. The decision to defer the closures of these fire stations will be dependent on stations improving their availability, for example by adopting the aggregate crewing model.

9.7. The Service will also share more information with the public on availability at these fire stations to encourage recruitment of additional On-call staff where there are vacancies.

9.8. During the consultation a number of suggestions were put forward relating to potential amalgamation of fire station locations. These will be considered further and any proposals, if appropriate, will be brought forward for separate consultation and decision by the Authority.

#### **Removal of third appliances**

9.9. It is proposed that removal of the third fire appliances at Torquay, Bridgwater, Yeovil and Taunton is progressed as originally consulted. The Service will explore further how it might best ensure use of existing staff to support operational incidents where required, rather than reducing the number of firefighters within the Service.

9.10. The removal of four fire appliances means that the Service will not need to buy as many new fire engines in the future to replace them. As a new fire engine costs around £0.3m, this cost will be saved from the fleet replacement programme and further benefits will be realised through reduced servicing and maintenance costs.

#### **Removal of second fire appliances**

9.11. Often additional firefighters, not additional fire appliances, are required at larger incidents. Therefore, on many occasions a fire engine is only used to transport firefighters from a fire station to the incident as the amount of equipment available on the first attending vehicles is sufficient.

- 9.12. It is recommended that removal of the second fire appliances at Crediton, Martock and Totnes is progressed, with Lynton's second fire appliance being replaced with a new wildfire 4x4 and All-Terrain Vehicle (ATV). With the exception of Martock, alternative vehicles that can transport firefighters are either in place, or due to be provided in the near future. Should this option be agreed, an additional light vehicle will be provided for Martock.
- 9.13. The Firefighters on the alternative vehicles would be mobilised when available to respond. However, as it is only the first fire appliance at these stations that have been identified as risk prioritised fire appliances, firefighter payment for availability will not be offered for crewing of these alternative vehicles. However, should firefighters make themselves available on a voluntary basis, the full hourly rate will be applied for any incidents that are attended.
- Introduce variable fire appliance availability dependant on risk***
- 9.14. It is recommended that risk-based availability is initially introduced for second fire appliances at the following fire stations: Brixham; Dartmouth; Honiton; Ilfracombe; Okehampton; Sidmouth; Tavistock; Teignmouth; Tiverton; Wells; and Williton.
- 9.15. The risk and the nature of incidents that the Service attends changes throughout the day. Service data shows that during night time hours fires often go undetected for longer and therefore develop more significantly prior to a 999 call being made. When this happens, the Service will often utilise a greater number of firefighters and equipment to deal with incidents. During the daytime hours, people are generally awake and fire is often detected in the very early stages allowing for it to be extinguished before it develops significantly. However, people tend to be significantly more mobile during the daytime, moving from their homes to places of work increasing road related risk. The second fire appliances at these fire stations are often not reliably crewed during the daytime due to On-call staff leaving the communities where they live to undertake their primary employment. The Service proposes to increase the use of these fire appliances by crewing them when required during the daytime hours with roving crews that will undertake preventative activities whilst providing immediate additional emergency response capability.
- 9.16. Where these vehicles are not being used as roving fire appliances, they will remain available at their fire stations and can be crewed by firefighters at these fire stations if they are available to do so. As these have not been identified as risk prioritised fire appliances, firefighter payment for availability will not be offered. However, should firefighters make themselves available on a voluntary basis, the full hourly rate will be applied for any incidents that are attended.
- 9.17. It is also proposed that the second fire appliances at Chard and Wellington remain available to provide additional resilience for Yeovil and Taunton should the Authority agree to remove the third appliances at these locations. Frome's second fire appliance will also remain available due to its distance from other Service fire stations.

**10. RISK APPRAISAL**

10.1. Existing performance comparison based on all fire appliances being available.

Category	As is	Option 6	Option 7
Risk – Approximate Fire Deaths per year	7.61	7.76	7.65
Risk – Approximate RTC deaths per year	33.14	33.14	33.02

**11. OPTIONS APPRAISAL**

Category	Do Nothing	Option 6	Option 7
Risk – Approximate Fire Deaths per year	x	✓	✓
Risk – Approximate RTC deaths per year	x	✓	✓
Risk improvement	x	✓	✓
Resources to risk	x	✓	✓
Availability improvement	x	✓	✓
Re-Investment in Prevention and Protection	x	✓	✓
Station Savings (e.g. Rent, Utilities, Vehicle maintenance and equipment, retaining fees)	x	£0.985m	£0.486m
Investment in On-call	x	Not factored into the option at consultation stage	+£2.334m
Net budget impact	-	£0.985m savings	+£1.848m investment
Capital Receipts	-	£0.925m	£0.385m
Capital Savings	-	£4.800m	£4.031m
Aligns to HMICFRS recommendations	x	✓	✓

## **12. CONCLUSION**

- 12.1. The Service has recognised through the Integrated Risk Management Planning process that significant change to the service delivery operating model is required to enable reform and improve our service to the public of Devon and Somerset.
- 12.2. HMICFRS has inspected the Service and identified areas for improvement that support the findings of the Authority's Integrated Risk Management Plan. HMICFRS will be returning in late 2020/early 2021 and will be expecting to see how those areas for improvement have been addressed.
- 12.3. The outcomes of the public consultation have been independently reviewed and have been considered, with the purpose of the consultation to allow the public and staff an opportunity to comment on the proposals and present other ideas as to how the Service may be able to meet those requirements, outcomes and benefits. Option 7 aligns with the Service Vision, in particular 'involving communities and colleagues in designing our services.'
- 12.4. At its meeting on 28 June 2019, the Authority agreed to include an Option 7 for consultation. This gave a valuable opportunity for consultees to respond within the confines of the proposals identified by the Service as meeting the Integrated Risk Management Plan requirements, mixing and matching the elements to allow the public to influence the outcomes. The options appraisal section of this paper reflects that feedback and demonstrates that implementation of a revised set of proposals based on those elements that have been subject to consultation will satisfy the risks identified in the Integrated Risk Management Plan, many of the HMICFRS findings and the objectives of the Fire and Rescue Plan.
- 12.5. The adoption of Option 7 will result in the following benefits, helping us become 'Safer Together:'
- An efficient, effective delivery model that actively reduces community and commercial risks whilst improving the response to emergencies;
  - Improved fire appliance availability;
  - Increased flexibility, reward, recruitment & retention of the On-call workforce;
  - A choice of duty systems for Whole-time staff;
  - Cultural reform;
  - Increased productivity; and
  - Increased public safety

**LEE HOWELL**  
**Chief Fire Officer**