

APPENDIX C

DRAFT RESPONSES TO QUESTIONS IN 'MAKING SURREY SAFER PLAN 2020 - 2023' CONSULTATION DOCUMENT

4. To what extent do you agree or disagree that SFRS should adopt a risk based approach and focus resources where they are needed, and when they are needed?

Answer: Strongly agree

Spelthorne accepts the need for Surrey Fire and Rescue Service (SFRS) to manage their resources more efficiently and effectively in times of ongoing financial constraints and that in order to do this they will need to focus resources to protect those at higher risk. **The Council is, however, concerned that the SFRS has not applied their risk based approach appropriately, in proposing reduced night-time cover in Spelthorne.**

The '*Making Surrey Safer – Our Plans for 2020 – 2023*' document ('the plan') indicates that *the most vulnerable and at greatest risk of fire tend to have at least one of the following characteristics:*

- *Aged over 60*
- *Living alone*
- *Mobility issues*
- *Hearing loss*
- *Mental health issues*
- *Disability*
- *Drug or alcohol dependency*
- *A smoker*

The data outlined in the SFRS's Equality Impact Assessment (EIA) indicates that compared to other Boroughs and Districts in Surrey, Spelthorne has the:

- Highest proportion of its population classed as vulnerable to house fires (0.787 vulnerable people per 1000 population vs. 0.585 per 1000 for Surrey, which equates to 36% above the Surrey mean);
- Highest proportion of its population having a long-term illness or disability (14.9%) vs. the Surrey average (13.5%).

Spelthorne also has data which indicates that our borough has the highest level of smoking prevalence in adults (aged 18+) in Surrey.

Spelthorne is therefore, under SFRS's own specified risk characteristics, an area which presents a higher risk. Any cuts to fire service provision in our borough would therefore seem to be inconsistent with SFRS's proposed risk based approach. **In these circumstances we do not agree that it is appropriate to cut night-time cover within our borough or that this ensures that SFRS are focusing resources where they are needed and when they are needed.**

5. To what extent do you agree or disagree that SFRS should spend more time on community and business safety to help prevent incidents occurring in the first place?

Answer: Strongly agree

Spelthorne agrees that SFRS should spend more time on community and business safety to help prevent incidents from occurring. **It is, however, essential that in 'refocusing resources' SFRS does not reduce its ability to respond effectively to critical incidents.** The Council is particularly concerned over the proposal for some of the preventative work to be undertaken by night shifts, which would already have significantly reduced resources to tackle critical night-time incidents under the plan.

The 2018/19 report by Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) concluded that SFRS could do more to prioritise the most vulnerable people and had a relatively low level of engagement with business to educate them about complying with fire regulations. The inspector also had doubts as to the Service's ability inspect all the high risk properties it identified and that improvements were required in the way it prevents fires and other risks.

Although SFRS have now put in place plans to improve engagement on community and business safety, the HMICFRS findings would suggest that SFRS are significantly behind in this area of work. The Council accepts that increased emphasis on fire prevention should eventually lead to a reduction in future incidents. The speed and effectiveness of this approach will, however, depend on how quickly SFRS can plug the large gaps identified by the HMICFRS Inspector. The EIA indicates that one of the Service's targets is to increase Safe and Well visits from 4,500 in 2018 to 20,000 by 2021. It is not clear how this target level of home visits compares to the number undertaken by other fire services, but given that SFRS also needs to significantly increase preventative work with businesses, this would seem to be an extremely challenging target, if adequate cover for critical incidents is to be maintained. In reality, without significant additional resources, it may take much longer for SFRS officers to hit such specified targets and it may therefore take many years for the benefits of this work to come to fruition. It is not clear from the EIA as to how quickly SFRS expect such improved community and business engagement to take effect and what reduction in critical incidents it expects from this work.

In SFRS's stated vision, mission and aims it states: *'Ideally through increased emphasis on protection and prevention, we would hope to see the number of fires, injuries and deaths fall in the county.'* In the EIA it states: *'A change in the way that community and business fire safety activities are delivered may have positive impacts to certain groups'* and that *'Targeted visits could have an overall positive impact for groups at risk of fire, including the elderly and people with disabilities.'* Such statements (including words like 'hope' and 'could') would suggest that it is difficult to accurately predict the level of reduction in critical incidents that would result from increased preventative work and how long it would take for this to show significant

benefits. The speed and level of response is likely to depend on a wide range of factors, including not only coverage, but also the effectiveness of the advice and training given by SFRS representatives and the ability of individuals (particularly those with characteristics which predispose them to a higher risk of fire) to understand and implement the recommendations being made.

In view of these uncertainties we believe that **SFRS should not make any proposed cuts in night-time fire cover in Surrey until the results of the increased preventative work are thoroughly analysed and shown to be having the desired reduction in critical incident call-outs.**

6. To what extent do you agree or disagree with SFRS maintaining the number of fire stations and fire engines in Surrey but changing how Banstead, Camberley, Egham, Fordbridge, Guildford, Haslemere, Painshill, Walton and Woking are crewed at night?

Answer: Strongly disagree

Spelthorne strongly disagrees with SFRS's proposals for changing how the fire station in Ashford (Fordbridge) is crewed at night for the reasons outlined in our answers to questions 4 and 5 above. We are also very concerned over the longer response times proposed and the lower level of cover that would be available across Surrey at night.

The question suggests that SFRS would be maintaining the number of fire engines available for action under the proposed plan, but the information outlined in this plan indicates that although the number of engines available in the day-time (weekdays) and day-time (weekends) would remain the same (at 25 and 30 respectively), the number of engines available at night would drop from 30 (under the current model) to 23 (under the proposed plan). This question would therefore have been clearer if it had stated: *'To what extent do you agree or disagree with SFRS maintaining the overall number of fire stations and fire engines in Surrey but reducing the number of fire engines available to respond to emergencies at night at Banstead, Camberley, Egham, Fordbridge, Guildford, Haslemere, Painshill, Walton and Woking?'*

The Equality Impact Assessment (EIA) published with the Plan indicates that under the proposed changes:

- In relation to average response times – it will take on average 15 seconds longer for a first appliance to arrive at a critical incident in Spelthorne (compared to 12 seconds longer on average in Surrey)
- In relation to night time response cover – it will take on average 42 seconds longer for a first appliance to arrive at a critical incident at night in Spelthorne (compared to 38 seconds longer on average in Surrey).

No indication is given as to any changes in the response times for subsequent appliances (including special appliances) to respond to a critical incident.

SFRS's own EIA indicates that, compared to other Boroughs and Districts in Surrey, Spelthorne has the highest proportion of its population classed as vulnerable to house fires and the highest proportion of its population having long-term illness or disability. This, coupled with the fact that our borough has the highest prevalence of adult smokers in the county, indicates that Spelthorne presents a higher risk compared to many other Boroughs and Districts in Surrey, taking into account SFRS's specified risk characteristics. Any changes in response times and night-time cover could therefore have a significant adverse effect on the safety of our residents and businesses, particularly when you also factor in the projected increase in population and the proportion of elderly people across Surrey, which is likely to put additional strain on SFRS's resources.

Spelthorne has a range of high-risk sites within its boundary, is close to Heathrow Airport, the M25 and has a long river frontage which presents a significant risk in terms of water safety and potential future flooding. **The Council is concerned over SFRS's ability to respond quickly and effectively at night in the event of a major incident at one of these sites, if the proposed changes to night-time cover go ahead.**

Spelthorne also has an increasing number of high-rise residential and office blocks. The tragic events at Grenfell Tower demonstrated the challenges faced by firefighters in dealing with fires in high-rise blocks. Such incidents are particularly resource intensive and the Council is therefore extremely concerned that the cuts in night-time cover proposed in the plan will severely limit SFRS's ability to tackle such incidents. The ability of SFRS to tackle critical incidents is not only dependent on the level of cover provided but also on the location of fire engines and specialist appliances needed to tackle such incidents. Although the plan give details of the proposed number of fire engines available under the both the current model and planned changes, it does not give any detail on any changes proposed to the availability and location of special appliances needed to deal with high-rise fires and other incidents requiring such equipment.

The HMICFRS inspector made it clear that SFRS required improvement in the way it responds to fires and other emergencies. Spelthorne is far from convinced that the proposed changes to night-time cover will ensure that SFRS have the right resources in the right place at the right time to respond when they are needed in an emergency.

7. To what extent do you agree or disagree with increasing the catchment area for on-call firefighters to aid recruitment?

Answer: Neither agree nor disagree

Spelthorne has given this response as it is difficult to answer this question without any indication as to the extent to which any catchment area would be increased and what effect this would potentially have on response times. **Any such changes must not have any significant adverse effect on response times.**

Although Spelthorne acknowledges the important role played by on-call firefighters and SFRS's desire to encourage recruitment, the Council has concerns over the increased reliance on on-call crews and the possible effects that this, together with any increased catchment area, could have on response times and the SFRS's capacity to deal with critical incidents.

SFRS currently requires on-call firefighters to live within four minutes of their on-call fire stations, to ensure that they can get there quickly. By increasing the catchment area it would seem inevitable that on-call firefighters would on average take longer to reach the on-call fire station. It is unclear whether SFRS have undertaken any modelling of the effects this could have on response times.

The effect the proposed changes could have on the welfare of on-call crews does not appear to be covered in the EIA. Under the plan the ratio of whole time to on-call fire engines available at night would drop from 2:1 to 1.3:1. Although it is accepted that part of this reduction is down to the lower number of incidents which now occur, it would seem inevitable that this change in ratio would lead to more pressure on the on-call crews to respond to incidents at night. In view of the fact that most of these are likely to have other day-jobs this could lead to more fatigue amongst on-call firefighters.

The fact that there would be more reliance on the on-call crews to respond at night may make it more difficult to recruit to these posts, even with an expanded catchment area.

8. To what extent do you agree or disagree that the service recovers costs from some non-emergencies to re-invest in SFRS?

Answer: Strongly agree

Spelthorne supports the proposal to charge for the type 999 calls outlined in the plan, such as false reports of fire (hoax calls & automatic fire alarms that are not real) and animal rescues, provided that this revenue is re-invested into the SFRS.

Other general comments

The consultation document is very high level and contains a number of statements which are somewhat meaningless without further detail. For example:

- In the *'Our commitments'* section it is stated that the SFRS aims *'to provide a service offer that is broader than solely 'time to respond' and recognise that the urban and rural response is different. We will establish new measures based upon community and business safety activity (a core element of our future offer) as well as response.'*

There are a number of inconsistencies in the information provided. For example:

- Reference is made to the *'Making Surrey Safer – Our Plans for 2020 – 2023'* document throughout the consultation material, whereas the front page of the plan itself has the title *'Making Surrey Safer – Our Community Safety Plan'*.

Some statements are also likely to lead to confusion and suspicion as to future plans. For example:

- Question 6 of the questionnaire asks *'To what extent do you agree or disagree with SFRS maintaining the number of fire stations and fire engines in Surrey'* whereas under the *'Our commitments'* section of the consultation document it only refers to maintaining the number of fire stations in Surrey and changing how some of them are crewed. This could suggest that SFRS is planning to further cut the number of fire engines in the future.

The supporting information which accompanies the consultation document is not particularly easy to access and/or follow in some instances. For example:

- In the consultation document *'Further reading'* section, a link (no.6) is provided to the Community Risk Profile (CRP). This takes the reader to the Surrey Fire and Rescue section of the Surrey County Council website. On this page there is no specific mention of the CRP so it may not be obvious to some people wishing to respond how they can access this document. At the bottom of the page there is a link to *'How we manage risk and business continuity'* which takes you to another page where you have to scroll to the bottom to find the *Community Risk Profile 2019*. This document could have been made much easier for people to access by providing a direct link.
- The *Community Risk Profile 2019* document itself provides a range of data outlining the risks associated with population characteristics but other than a number of 'heat maps' showing information such as density of accidental fires, heritage fires, commercial fires and RTC incidents, there is no data provided to demonstrate the number of incidents per Borough/District. Such 'Performance data' was provided as a table in the previous Community Risk Profile. The heat maps provided in the 2019 CRP do not show the Borough/District boundaries and are not of a sufficient resolution to enable anyone to work out the locations where these incidents occurred.