

**THE MANAGEMENT OF HEALTH AND SAFETY
AT CORNWALL FIRE AND RESCUE SERVICE**

**REPORT OF THE INSPECTION BY
THE HEALTH AND SAFETY EXECUTIVE**

OCTOBER 2009

INTRODUCTION

- 1.1. This report presents the findings of an inspection of the health and safety standards at Cornwall Fire and Rescue Service (CFRS) carried out by the Health and Safety Executive (HSE) in October 2009. The inspection followed the approach used in the HSE publication '*Successful Health and Safety Management*' (HSG65).
- 1.2. The HSE inspectors were Elizabeth Hornsby, Judith McNulty-Green, Emma Darvill, Clare Owen and Emma O'Hara.
- 1.3. The inspection included the examination of relevant documents such as policy statements, risk assessments, guidance documents and Minutes from health and safety committee meetings. Staff were interviewed and spoken to during the inspection of specific work activities. The report is based on a sample of key operational activities.
- 1.4. Information on this topic has been gathered by the Inspection Team during their time at Service Headquarters, Portreath Training Facility and Fire and Rescue Stations across Cornwall as well as from documentation provided to the team during the information gathering stage of the audit.
- 1.5. As part of the overall assessment of the FRS's health and safety risk management systems, the inspection concentrated on the following issues:
 - Training and competence in core fire fighter skills including breathing apparatus and associated procedures and compartment fire behaviour training
 - Competence for incident command
 - Provision of risk critical information to inform operational decision making
- 1.6. The recommendations set out improvements which will support CFRS to comply more effectively with its duties under the Health and Safety at Work etc Act 1974 (HSWA) and the Management of Health and Safety at Work Regulations 1999.
- 1.7. The conclusions and recommendations are based on the sample but where there are common patterns, the lessons and recommendations should be applied to other activities carried out in CFRS.
- 1.8. We would like to express our thanks to the management and staff at Cornwall Fire and Rescue Service for their assistance and co-operation during the inspection.
- 1.9. Copies of this report are being sent both to CFRS and to their employee representatives.
- 1.10. Throughout this report, we have used the term Wholetime (W/T) to describe not only firefighters at Falmouth and Camborne who provide 24 hour cover on a rolling shift system but also Day Crews at Newquay, Truro, Bodmin, St Austell and Penzance. The Retained duty system is referred to as RDS. Breathing Apparatus is referred to as BA / Fire Behaviour Training as FBT.

FINDINGS

2.1 POLICY

Is there an effective health and safety policy to set a clear direction for the organisation to follow?

- 2.1.1 The Health and Safety Policy H&S 1/001 was reviewed and amended in September 2009, prior to the HSE inspection. Service Support Team manages the review of policies in line with the document 'Management Policy' BIS ADM1/002 (Section 8).
- 2.1.2 The Health and Safety Policy outlines the Service's commitment to health and safety and gives supporting information. The general policy is supported by general policies on:
- Health & Safety Relevant Legislation
 - Health & Safety Strategy
 - Health & Safety Responsibilities
- These are underpinned by the Health & Safety Functional Plan, which monitors progress against a list of prioritised health and safety objectives for the year.
- 2.1.3 HSE's examination of these policies found that they cover relevant issues but that the large number of existing policies made it difficult to identify relevant points quickly. The Service should consider whether consolidating these policies into one overall health and safety policy would result in a simpler, more understandable approach.
- 2.1.4 These high level policies are supported by twenty four additional policies relating to both health and safety arrangements and topics. Other policies which have implications for health and safety were found under the heading of Training.
- 2.1.5 Cornwall FRS has recently revised many of its policies - in particular, policies on the topics which formed the core of the HSE inspection: Breathing Apparatus, Fire Behaviour and Incident Command Training and Premises Risk Information.
- 2.1.6 Staff with a strategic role such as the Chief Officer and Senior Management Team were able to explain the Health and Safety Policy and how it was applied in relation to the specific topics of the HSE inspection. The same was true for middle managers such as Group Managers, Training and Development Officers, Supervisory Officers, etc. Operational staff demonstrated a working knowledge of CFRS Policy and how their roles and duties with regard to this topic are managed to maintain competency.
- 2.1.7 In particular, senior managers were subject to a degree of challenge by the Inspection team about how Cornwall FRS Policy on BA competence and Fire Behaviour Training fits with the requirements of the national document - Fire and Rescue Service Circular 18/2009 'Firefighter Safety at Operational Incidents'. Cornwall are well advanced with implementation of a package of BA 'refresher' training on-station and 'hot wears' at their FBT facilities. While this does not directly reflect the requirements of FSC 18/2009, the current arrangements are in significant advance of the Service's previous position.
- 2.1.8 If implemented fully, the Service should be able to demonstrate competence in line with FSC 18/2009. Further information on current arrangements is included in both the Organising – Competence section and the Planning and Implementation section of this report. There are recommendations in relation to 'hot wear' element of competence.
- 2.1.9 The Service Support Team co-ordinates receipt, allocation and tracking implementation of relevant action from Fire Service Circulars. The Service recognises that currently information on complying with all relevant circulars on Core Operational Competencies is distributed amongst many documents/policies. The Service is currently working on producing a stand-alone document which will consolidate the relevant requirements.
- 2.1.10 Service policy is that core skills are maintained through drills, simulated training courses and at 'real' incidents.
- 2.1.11 Service policy is that each member of operational staff up to and including Area Managers must achieve compliance and competence for BA and CFBT. This is achieved through Officer Training days that include practical BA wear sessions at Portreath.
- 2.1.12 BA Competence is maintained through an annual refresher for W/T that covers relevant aspects of BA wear and deployment except 'hot wear'. The same syllabus is followed by RDS in a modular format of four modules, completed one per quarter.

- 2.1.13 CFRS have a carbonaceous hot fire training facility at Portreath; they also subcontract facilities at HMS Raleigh for gas-fired fire behaviour training with a course called 'Compartment Firefighting on ships'. Knowledge of marine and maritime vessels is deemed an essential skill by the Service given that the majority of the Cornish border is coastline
- 2.1.14 The combination of these two courses allows the Service to offer a complete suite of relevant fire behaviour training in both carbonaceous and LPG facilities. Allocation of nominations for these courses is generated by the training department.
- 2.1.15 Training Policy for Fire Behaviour is that the two 'hot' events should be completed within a three year period and that Portreath and HMS Raleigh should be attended on a rolling programme. Effectively therefore every firefighter gets a 'hot wear' every eighteen months and the benefit of both compartment fire behaviour environments. Discussions with fire crews raised concerns with the audit team that the current situation does not match the policy. Subsequently, senior managers explained that the new policy has yet to be implemented across the Service.
- 2.1.16 The Policy on Incident Command makes clear that only firefighters who have received suitable and sufficient incident command training can take control of operational incidents. The level of Incident Command training for discrete levels of operational incident is also specified.
- 2.1.17 The Operational Training De-Briefing (OPS1/041) Index sets clear policy expectations for when and how debriefing is to be undertaken and how this will contribute to monitoring of standards.
- 2.1.18 The new Site Specific Risk Inspection Policy OPS1/037 concentrates on how the premises risk register should be inspected and updated via job sheets, which are formulated using a wide variety of information from existing premises information, Fire Safety audits, completion notices, local knowledge, building control notifications, etc. The objective is to ensure that the information held is as up to date as it can possibly be.
- 2.1.19 The policy contains some guidance on what constitutes a risk by giving examples of different types of risks, such as composite panel structures. The policy does not refer to how new risks should be identified by local crews although it is clearly expected that they will identify new premises or risks. Comments in the Planning & Implementation section below will apply. It may be useful to provide a couple of examples as above of when the risk register should be updated. This will enable staff to assess what information is important and worthy of inclusion.
- 2.1.20 The policy allows for desktop assessments to be completed for perceived lower risk premises, or a self assessment can be requested from the dutyholder. This should free up some time to concentrate on higher risks but as the policy says, should not be used in lieu of a visit if that is more appropriate. The new policy on the risk information system includes a greater element of scrutiny as its outputs are a standing agenda item on various forums.

Recommendation

1. The Service should consider consolidating the high-level policy statements on health & safety into one overall health and safety policy.

2.1 ORGANISING – CONTROL

Is there an effective management structure and arrangements in place for delivering the policies?

- 2.2.1 Cornwall FRS has been through a period of substantial organisational change including the appointment of a new Chief Fire Officer and Deputy. The senior team has reviewed the structure and have implemented changes, influenced by the 'One Cornwall' Unitary Authority model. They appear open to communication from other parts of the organisation.
- 2.2.2 The changes at senior management have been followed by a re-arrangement of portfolios and responsibilities at middle management level. Many CFRS' policies have been produced/rewritten recently and have yet to become embedded in the ethos of the organisation. However managers are already considering early review and modification of how systems could be made more effective.
- 2.2.3 There was evidence of a clear management structure, which translated into Incident Command arrangements. Fire fighters expressed concern that middle managers and supervisory officers

get moved frequently so there is little continuity. There were some notable examples where a longer-term supervisory relationship has proved beneficial and improved team performance. The Service has identified that the need to have supervisory staff in post for longer length of time.

- 2.2.1 As detailed above, there have been changes to Policies and accordingly to the organisational arrangements. During the inspection, we were not necessarily able to obtain definitive proof that systems being described were in place rather than aspirational. The Service needs to monitor that policies and procedures become embedded within the organisation, or adapted to suit the needs of the organisation. This is a matter on which HSE will focus during the follow up visit.

2.3 ORGANISING – CO-OPERATION

Are there adequate and appropriate arrangements to secure the trust, participation and involvement of all employees?

- 2.3.1 Firefighters within the Service belong both to the Fire Brigades Union and the Retained Firefighters Union. Inspectors met with Representatives from both unions and included their views within the discussions at station and HQ level. Some administrative staff belong to Unison
- 2.3.2 Safety Representatives are on the Safety Committee which meets quarterly. It is a measure of the transparency of the Service's arrangements that senior managers were already aware of almost every issue raised by employee representatives.
- 2.3.3 There was a general acknowledgement throughout the workforce that Cornwall FRS is undergoing a necessary process of change. The main measure of concern expressed was whether, under the revised arrangements, there would be sufficient time to concentrate on training and maintenance of safety critical skills.

2.4 ORGANISING – COMMUNICATION

Are there adequate arrangements to secure an information flow into, within and from the organisation?

- 2.4.1 There was a good formal system for communication in the form of policy documents and information available to all staff via the Brigade (Service) Information System (BIS).
- 2.4.2 Staff based outside Service Headquarters raised positively the regular visits undertaken by Group Managers and Supervisory Officers as mechanisms for the transfer (in both directions) of information across the Service.
- 2.4.3 A number of stations identified the Training Centre trainer, who was assigned to support their (or their group of) stations, as an additional mechanism by which information was promulgated.
- 2.4.4 Overall the view of the Inspection team was that communications within the Service were good. For example, there was good knowledge displayed by crews across all duty systems and stations of the recently implemented changes to Policies, procedures and arrangements. Staff who undertake the role of incident commander feel confident that Control will be able to give them any relevant information not available on appliances.

2.4.5 2.5 ORGANISING – COMPETENCE

Are there systems and arrangements to secure the competence of all staff?

- 2.5.1 The Service acknowledged that it is undertaking a fundamental review of training, including the introduction of a computerised competence database (PDR-Pro).
- 2.5.2 The training department were open in their discussions about the impact on delivery of being below cadre of training staff. Due to resource issues, some mandatory courses had not been run. However, the Service was not (at the time of inspection) able to demonstrate a finished Training Needs Analysis to support the designation of courses as mandatory or otherwise, with required frequency of attendance.

- 2.5.3 The work force comes from a variety of backgrounds and learning styles and abilities vary. Consideration has been given to how disabilities such as dyslexia and colour blindness may affect learning abilities and the Service should consider how to identify individuals with literacy and numeracy issues if this may impact the role they perform.
- 2.5.4 The competence recording system is currently paper-based and is called MOST (Maintenance of Skills and Training document). It provides a record of what skill was demonstrated by which fire fighter and level of competence. Operational examples of competence are completed on a shout by shout basis and recorded in a log book/folder. A varying amount of detail was recorded depending on the crew visited.
- 2.5.5 Examples of competence demonstrated through training and drills are also recorded. The completed log is monitored by supervisory officers on a monthly basis for W/T and quarterly for retained crews. Some variations in recording were observed during the inspection; in preparing for the implementation of PDR-Pro, the Service ought to identify how evidence should be recorded to ensure a more uniform approach to record keeping. Following the inspection, the Service has informed us of their plans to ensure a more uniformed approach to record-keeping through 'drop down' menus within the PDR-Pro system, training and Assessor Network Consistency meetings.

Core Skills

- 2.5.6 Whole time fire fighters attend a sixteen week training school course before being deemed 'approved to ride' and complete their development phase approximately three years from their date of joining. RDS firefighters undertake a modular course at training school to be deemed 'approved to ride'. This is followed by competency-based training, recorded by the recruit. They generally achieve competency at forty eight months with a maximum period of sixty months from joining to competent rate of pay. Good evidence was accumulated of this system operating as per the policy.
- 2.5.7 Within the Cornwall fire service a number of retained staff have made successful applications to transfer to the wholetime duty system. The Service has decided that, the basis of their existing competence, these staff will only attend a two week conversion training package. This issue was raised by firefighters at various stations and the senior management team should consider how they could communicate more effectively their policy decision and the reasons behind it.
- 2.5.8 All whole time fire fighters were confident that they could maintain their core skills adequately through their frequent operational activity plus training. Concerns were expressed by some W/T firefighters that the increasing pressure to deliver more fire prevention and community based work may adversely impact on time available for training.
- 2.5.9 The inspection team recognised that some RDS stations struggled to attend sufficient operational incidents to demonstrate maintenance of competence. We were reassured that senior managers were aware of these issues and had taken action to support stations with a robust system of centrally determined but locally provided training based on station risk profile.
- 2.5.10 Assessor training days are run to keep watch/crew managers abreast of any changes/updates. Some stations have training staff as part of their retained crews, so they also provide an additional training resource at drill nights.
- 2.5.11 Drill nights deliver the majority of the rest of the occasions to refresh and renew skills. Concern was expressed by many fire-fighters at all levels of the organisation that retained staff could not maintain their skills using the existing two hours drill per week as equipment and duties have changed greatly in recent years. The complexity of techniques and increasing specialist items of equipment mean that retained staff give up their free time in order to practice and keep up to date with essential skills.
- 2.5.12 The Service does pay station managers additional hours beyond drill night for administrative work. Retained crews who have certain Specialist skills, for example Newquay RDS who operate the Aerial Ladder Platform and High Volume Pump, are paid for training hours beyond the normal RDS drill. Further information about specific Specialist training is included at the end of this Section of report
- 2.5.13 The 'Fire Fighter Maintenance of Skills Manual' includes all the training activities a fire fighter needs to carry out. This document has been produced through the Regional Inter-Service

Working Party set up between Cornwall, Wiltshire, Gloucestershire, Dorset, Avon and Devon & Somerset. The skills in the folder were mapped to the National Occupational Standards. (Documentary evidence was provided to support this claim.) The Folder provides a description of each skill along with the frequency it should be rehearsed. It includes aims and objectives, learning outcomes and a training design to allow the Watch /Crew manager to deliver the drill / subject area effectively.

BA training

- 2.5.14 BA Training is refreshed on a 4 module basis annually for retained crews, and by one day's training annually for whole time crews. The training is done by Portreath trainers, principally those who are qualified BA Instructors. This regime appears to have been introduced within the last twelve months and is consistent with the approach outlined in Fire Service Circular 18/2009.
- 2.5.15 The Service were able to provide the inspection team with planned dates for on-station BA training for all duty systems for the next year. Evidence was seen in the MOST training logs of the BA syllabus being covered during the on-station modules for RDS stations.
- 2.5.16 While questioning firefighters on the topic of BA, there was often mention of the TAFF (Tactical Fire Fighting) course. Perhaps inevitably there is some lack of clarity because of the fact that the TAFF course involves a 'hot wear' in BA. Overall, the HSE inspection team concluded that the Service regarded competence to wear BA as being indivisible from competence in knowledge of fire behaviour.

Fire Behaviour Training (FBT)

- 2.5.17 Cornwall FRS's current policy is that fire fighters should attend fire behaviour training every eighteen months. While the learning objectives from fire behaviour training as defined by Fire Service Manual - Volume 4: Fire Service Training: Guidance and Compliance Framework for Compartment Fire Behaviour Training are completely different to the objectives of the BA refresher, this requirement has been devised at least in part to comply with the national standard of a minimum two 'hot wears' in a three year period.
- 2.5.18 There was a general understanding among all personnel that routine FBT training is organised through training department at eighteen monthly intervals. Since FBT is provided by Cornwall FRS through their own training department at Portreath and sub-contracted through HMS Raleigh in a course entitled 'Compartment Firefighting on ships', there was some confusion amongst staff interviewed as to exact requirements of attending Raleigh and Portreath. Fire-fighters are not clear whether they have to attend both locations and just one.
- 2.5.19 There was also mixed evidence from crews about attendance at both or only one location. Most fire-fighters did not know exactly when they last attended a hot wear course. One fire-fighter said that he had not attended Raleigh training since 2003. This is doubtless in some degree due to the fact that the current requirements have not yet been implemented fully across the Service. The FRS should ensure that the requirement to attend relevant FBT training (and how it underpins BA competence) is clear throughout the organisation.
- 2.5.20 RAF Culdrose also has an LPG hot compartment fire training facility. Stations close to Culdrose on the Lizard (Helston, Mullion and St Keverne) have a reciprocal training agreement with RAF, utilising Culdrose and Predannack, negating the need for excessive travel.
- 2.5.21 Training staff at both FBT courses have to assess trainees and deem them either competent or non-competent in the use of BA. An IT system allows for analysis of who is competent and compliant with the number of hot wears. The training centre manages course attendance and works to ensure that delegates receive invitations to refresher events to ensure their training is up to date, although RDS crews frequently expressed the opinion that there was insufficient notice given of course dates. The Training Centre strives to achieve a minimum of ninety days notice, unless someone is filling a short notice place because of cancellations. The maximum notice can be up to twelve months.

- 2.5.22 Attendance at training is monitored by an IT system which is soon due for replacement. It creates reports on who needs training, or who has attended and is deemed non-competent. At the time of the visit, eleven officers are non-compliant in that they haven't attended two 'hot' training events in the previous thirty-six months. These eleven are on restricted duties. The training department is confident that all officers will have attended appropriate training and will be 'compliant' by the end of 2009. Fourteen have been deemed non-competent because of their performance at TAFF training.
- 2.5.23 All staff are clear that if you fail a course and fall out of competency, then you are issued with PIP (Personal Improvement Plan) drawn up by the central trainers in consultation with your line manager, which is then implemented locally. An individual's line manager will always be informed that there is a competence issue, and will manage them back to competence.
- 2.5.24 There appeared to be some lack of clarity about if, when or how BA wearers deemed not competent could be operationally deployed. Some staff who are capable of taking the Incident Commander role at higher level events stated that an individual deemed not competent will never be in attendance at an event requiring BA; others said that these personnel could be used as an Entry Control Officer or on other duties or even that they would be allowed to use BA under supervision of a competent officer.
- 2.5.25 There had been a system for marking the helmets of 'out of competence' firefighters but this system has been withdrawn. Firefighters, including officers, expressed concern that it is impossible to know who is compliant currently. A full list of fire-fighters individual competencies is held ONLY by training department. The current arrangements for only committing competent BA wearers at an incident rely on the fire fighter with a PIP letting the incident commander know.
- 2.5.26 The HSE inspection team were concerned about any potential deployment of operational staff deemed 'not competent', particularly within such roles as Entry Control Officer which falls within the requirements of BA competence. We discussed with senior management the challenges the existing arrangements may present within the 'can do' culture of the Fire & Rescue Service and discussed options on how to manage this. The Service should clarify how firefighters deemed 'non-competent' can be deployed (if at all) at operational incidents.
- 2.5.27 Following discussion with the training team at Portreath, it seems an average of two out of every ten delegates is deemed 'non-competent' following the TAFF course. This seems a high proportion of delegates to be failing to achieve a satisfactory standard. It is not clear whether the pass mark is deliberately set at a high level, or if the time allocated for training is insufficient to bring all delegates to the skill level required. Another concern expressed by crews was that some courses are cancelled if insufficient delegates attend and firefighters, due for refresher, are sent away without a next planned attendance.
- 2.5.28 The TAFF course was originally designed to be held over two days and has been modified to fit into one long and busy day. The Service should consider whether the current one day length of this course is sufficient to cover suitably and sufficiently all the required elements of fire behaviour training and the 'hot wear' required for BA refresher.
- 2.5.29 The Service also needs to consider how it monitors firefighters at RDS stations with low callout rates who may fail to meet the criteria in FSC 18/2009 of wearing BA at an operational incident within a twelve month period. If any firefighter are identified to fall within this category, then the Service will need to determine how this situation will be dealt with either through restricted duties or through more frequent 'hot wear' training.
- 2.5.30 Crews stated that training in mixed groups with delegates from other stations is effective and has improved the share of knowledge between whole time and retained crews. However other crews stated that they would like to train with their station colleagues in order to improve their effectiveness in team working.

Incident Command

- 2.5.31 There are clear training requirements for the acquisition of competence for staff at levels up to an including Area Manager contained within the document Incident Management & Command Training, Development & Assessment Policy (TRG1/004), dated July 2009. Service policy is that only staff who have successfully completed Crew Commander Induction and Crew Command Development can take the role of Incident Commander.
- 2.5.32 The Service acknowledges that it has yet to develop its standards for the acquisition and maintenance of competence in incident command for senior Service Managers. This work is being done in partnership with other Services within the region and will encompass arrangements for the progression of incident commanders to more complex incidents. HSE recommends that this work should be given a high priority.
- 2.5.33 The training to develop incident command skills is in three modules, the first two of which are provided 'in Service'. The final module is the Cornwall 'Operational Development Course' at the Fire Service College. A number of crew managers at various stations commented how important this valuable learning opportunity had been to their competence and confidence in Incident Command. Staff were *unclear* whether this course was available to all crew managers (whole-time & retained), and many stated their opinion that the value of the course could be further extended by a crew training together as a unit. (This opinion was expressed across many areas of training, not solely in relation to Incident Command)
- 2.5.34 Incident Command training at FSC is one off training. There is no refresher training. Operational exposure is essential to maintenance of skills and consolidation of training.
- 2.5.35 Another mechanism to maintain incident command skills is presently being instigated via the Tactical Command Trainer (TCT) System (formally known as Vector). This mechanism is also being proposed for a two-yearly mandatory safety critical assessment. A small number of staff raised their apprehension at a "computer game" being used for such an assessment, in that their age and lack of IT skills may not be taken into account. The Service must ensure that its system for assessment of incident command skills is not only effective but also tailored to the individual's capabilities and the type of incident to which they will be mobilised.
- 2.5.36 In part, this will be covered by Service proposals to use local / real examples of high risk premises within the TCT system. Video footage shot at the localities will enable training to be more realistic and relevant. Consideration should be given as to whether these videos would be of benefit to local crews who may be struggling to find the time to actually get out and carry out inspections / training.
- 2.5.37 The policy document includes arrangements for the maintenance of skills. One of these mechanisms is the quarterly Officer Development Days. Sample visits to retained duty stations indicate however that retained staff do not attend, nor are expected to attend, these events. The Service has informed us since the inspection that they are increasing the number of Officer Development Days up to six a year on a needs basis. Information will be cascaded to Retained crews through the Retained Manager who attends the Development Days.
- 2.5.38 A number of retained staff raised their opinion that whole-time staff sent to incidents in support or supervisory rolls, often took over the Incident Command, rather than mentoring or auditing. The retained staff acknowledged that where incidents were of a greater size / risk profile that this may be appropriate, but believed that their opportunities to develop experience in Incident Command may be restricted.

Other training matters

- 2.5.39 Specialist Appliances are located primarily at wholetime stations including day crewed. Exceptions to this are the Unimog and Mule, which are sited at Launceston and Looe. This has significant implications for the training load on RDS at the Day-Crewed stations. Concerns were expressed across all duty systems about whether sufficient time was available for these crews to maintain such a wide range of competence. Specialist skills are identified within the drill plan, and frequency of drill is dictated by the MOST logs. Evidence from the MOST logs indicated that RDS staff were undertaking the relevant training.
- 2.5.40 Location of Specialist Appliances is currently subject to a Service Review.
- 2.5.41 However, due to staff re-location, there were firefighters and managers on some stations who had not received relevant training on Specialist appliances at their new stations. The Service is

required to ensure that employees are provided with adequate health and safety training if exposed to new or increased risks because of being transferred.

- 2.5.42 CFRS' policy is that firefighters should not enter water and therefore generally only Level 1 water training is provided – except at St Austell and Falmouth where Level 2 training is given because water rescue appliances are located. A specific concern at Newquay station was that deploying the High Volume Pump (HVP) requires entry into water for which Level 2 training should be provided. Level 2 was given to all those who were originally trained to use the HVP but with recent staff moves, the cadre of suitably trained crew is diminishing. Several staff indicated there was not enough training on use of high volume pumps.
- 2.5.43 It was mentioned to Inspectors that EFAD refresher training was not necessarily carried out on the same type of pump that the qualified driver would be using in operational work, and even occasionally on another type of vehicle altogether. Refresher training should be suitable and sufficient to control relevant risks to health and safety.

Recommendations

2. The Service should complete its fundamental review of its training needs analysis. This should be based upon the Service's risk profile and its Integrated Risk Management Plan. Of particular concern is that the Service has sufficient resourcing (in-house or contracted) to meet its training need.

BA / FBT Recommendations

3. The FRS should ensure that the requirement to attend relevant FBT training (and how it underpins BA competence) is clear throughout the organisation.
4. The Service must manage this varying understanding of 'non-competence' and should clarify how firefighters deemed 'non-competent' can be deployed (if at all) at operational incidents.
5. The Service should consider whether the current one day length of this course is sufficient to cover suitably and sufficiently all the required elements of fire behaviour training and the 'hot wear' required for BA refresher.
6. The Service should monitor whether any firefighters do not wear BA operationally at least once in every twelve months and take appropriate steps.

Incident Command Recommendations

7. The Service should continue the work it is presently undertaking with local Services within the region to determine standards of competence acquisition and maintenance in incident command for Service Manager(s). This work should be given a high priority.
8. The Service should clarify the availability of the Operational Development Course for Crew Managers.
9. The Service should consider how it proposes to deliver the maintenance of skills training provided by the Officer Development Days to retained staff.
10. The Service must ensure that its system for assessment of incident command skills is not only effective but also tailored to the individual's capabilities and the type of incident to which they will be mobilised.
11. The Service should consider whether its current resource (of ten officers formally trained as Vector facilitators with only one who has completed a Level 3 BTEC Award and is therefore an accredited TCT facilitator) is sufficient to deliver maintenance of skills training and formal assessments proposed through the Tactical Command Trainer System.

Specialist Skills Recommendations

12. The Service is required to ensure that employees are provided with adequate health and safety training if exposed to new or increased risks because of being transferred.

2.6 PLANNING AND IMPLEMENTATION

Is there a planned and systematic approach to implementing the health and safety policy

- 2.6.1 Across all topics inspected in relation to provision of training for competence, there was clear evidence of a planned, systematic approach to implementation according to the Service's health and safety policy and arrangements.
- 2.6.2 In some areas, the revised arrangements contained within newly decided Policies had not been implemented. However, in these circumstances, there was a good level of awareness among staff generally (and particularly officers) of the proposed changes to existing arrangements.
- 2.6.3 Each fire stations drill chart will be a unique, rolling eighteen month programme dictated by the types of risk in the station area and the types of equipment operated. The basis of the drill programme is a risk analysis undertaken by the training department. There is some flexibility so that local issues may be substituted or skills moved up the schedule should a need be identified. However there was comment that the programme had insufficient flexibility to manage the number of additional events such as senior manager / statutory inspection body visits which are scheduled in for stations.
- 2.6.4 Each RDS station has an allocated Training officer (who confusingly was often referred to as a Supervisory officer) whose function is to support training at a small group of stations. Many stations were very complimentary about this arrangement. It is clear to the inspection team that generally stations are carrying out the drill programme.
- 2.6.5 It is acknowledged within the Service that retained firefighters struggle to maintain their skills in the two hours per week allocated to drill night. Skills are being maintained because the majority of retained crews give their own time selflessly to stay abreast of their skills. Completion of drills is monitored by Supervisory Officers. The inspection team were told of instances where supervisory officers organised training at mutually agreeable times for watches rather than sticking to the drill schedule. Another supervisory officer had organised for his crews to undertake a series of visit to risk register properties at times other than drill nights to gather up to date information. This was well received by staff. These innovative ways of working are to be commended.
- 2.6.6 The FRS is confident that the core skills base is being maintained currently. However the senior management team accepts that there will need to be an imaginative approach to ensure continued maintenance of competence. Consideration is being given to various approaches including an RDS station coming together other than on their specified drill night to undertake training (with station cover provided) so that the drill can continue undisturbed.
- 2.6.7 There is also evidence of a planned approach demonstrated in the Service's introduction of a computerised database of individual staff competencies. The original computer based recording system is no longer functional and currently a paper system is in use until the new electronic system, PDR Pro comes on line. Centrally there was recognition that PDR-Pro should not be implemented until it is appropriately configured for the outputs that CFRS require and suitable guidance has been drafted. The HSE inspection team was supportive of this approach.
- 2.6.8 Training (and implementation) of the system will be rolled out to managers initially, then cascaded through the entire service. The primary purpose of the database is demonstration of individual competence, with the database kept up to date by each firefighter, monitored by crew/watch managers. The administrative burden of keeping the system up to date could clearly impact on retained staff who are only paid for drill nights and callouts. However Cornwall has had the database customised so it will also be possible for crew / watch managers, who have seen competence demonstrated, to input evidence onto the database for firefighters with the aim of reducing individual burden. It is also envisaged that staff will be able to keep it up to date in their own time as it is an internet based system and can be accessed from places other than the fire station.
- 2.6.9 Overall the implementation team have been sensitive to the problems encountered in implementation of a computerised competence database by other Services with a large number of retained staff. They have developed an appropriate framework with supporting guidance prior to roll-out and they have well-considered plans for implementation of the database in early

2010. During and post implementation, CFRS needs to assure itself that the system is fit for purpose. Progress with this initiative will be monitored at the follow up visit.

- 2.6.10 There was good evidence across the Service that crew who may be required to undertake the role of incident commander even at a one pump incident are receiving appropriate incident command (IC) training. At most RDS stations, the Station and Crew and Watch Managers were all trained in incident command. Some delegates get to put their training into practice frequently because, on their station, they rotate the IC responsibility to ensure they all keep their hand in but others indicated that they may not work in the IC role frequently enough to maintain their skills.
- 2.6.11 As discussed in Organising for Competence section above, the Service should consider how it will fulfil its policy to maintain skills in incident command, particularly for RDS. One of the Officer Development Days was held at Newquay Airport. This is a good example of how local knowledge and competence can be improved. Consideration should be given to how such opportunities could be widened to operational staff across all roles and duty systems.

Risk Information

- 2.6.12 As with other inspection topics, there have been recent changes to the arrangements for managing premises risk information. The Service was able to demonstrate a planned approach to picking up new risks and how the Operational Risk Register (ORR) is amended to reflect them. Triggers for an inspection or audit by the Fire Safety team include a fire or three false alarms in a month. Using information going back over three years, a list of poor dutyholders is also drawn up for inspection annually. Any relevant information gathered through these processes is fed back into the ORR. Changes to the assessment of risk and production of a revised procedure were demonstrated to inspectors following a Fire Safety Audit or a formal debriefs – examples being the King Harry Reach fire plan and Blackpool China Clay works etc which led to changes to Standard Operating Procedure for asbestos.
- 2.6.13 In general, CFRS were able to demonstrate that they have appropriate arrangements to identify new and increased risks; it is however, currently, still predominantly a reactive approach to collecting risk information and the Service could review whether its approach could be incorporate more proactive elements, such as its recent initiative in relation to 'rough sleepers'.
- 2.6.14 At HQ, Inspectors carried out a visual examination of the ORR and noted some risk premises which had no recorded visits or planned date of next visits and others that had not been visited within the specified time period. During visits to stations, Inspectors were told that where visits had been carried out and information sent to HQ, there was often considerable delay before the ORR was updated and in a few cases, the information had 'slipped through the system' and someone was asked to revisit a risk premises which had already been done. There will always be glitches in any system but it must be disappointing for the Service given the amount of effort that has been focussed on getting the ORR up-to-date.
- 2.6.15 At present, the risk information system is paper based. There are no in-cab data terminals. Fire fighters reported that, in reality, they often only get time to read about a premise on the way to a 'shout'. A premises risk register was available at all stations when asked for. Inspectors saw examples of the hard copies which are kept on the premises and the vehicles at each station. High-risk premises identified included Frankes Tank Farm and National Trust premises - examples that highlight the diverse nature of the fire fighters' task and the significant risks to both persons and property.
- 2.6.16 Ensuring that information available to firefighters is suitable, sufficient and current is clearly more difficult (and time intensive) within an essentially paper system rather than an electronically delivered solution. The replacement Command Support Vehicles will have satellite communications and rugged laptops for use at larger incidents.
- 2.6.17 The Service has recently made enormous efforts to ensure that information is up to date. Service Support Team issue job sheets to stations every twelve months (April to April) detailing the high and medium risk premises that will need inspections over the course of the year. Generally, fire-fighters were clear at the intervals in which premises should be inspected. Some stations admitted that they had not completed this year's check visits because there just was not the time. At RDS stations, because of capacity issues, often the visits have been carried out by

wholetime firefighters or supervisory officers or Group Managers or Fire Safety Officers who have been taken off normal duties to complete the programme of risk visits.

- 2.6.18 This has achieved the objective of ensuring that premises risk information is mainly current; however it has, to a certain extent, divorced the retained firefighters from the knowledge of local risks for which the premises risk information familiarisation visits were originally developed. The Policy suggest that Fire Safety and operational crews should carry out inspections together but, at this time, that concept is purely aspirational and doesn't work in practice. In reality, co-operation is achieved by Fire Safety sharing any relevant information with the crews following a visit. Similarly if crews find a fire safety issue whilst on site, they can highlight this with control who will inform Fire Safety.
- 2.6.19 Crews at Retained stations expressed various concerns about the situation: they were not sure how and which premises were being visited / updated; crews suggest that their local knowledge is not as good as it could be because they aren't involved in the site visits or data collection. One fire fighter actually said that "Our local knowledge is lost as we don't get involved completing the TIPs / SOPs." The other issue that greatly concerned firefighters was knowledge of water sources. Hydrant maintenance is sub-contracted and Service Management has recently reminded firefighters of the need to know hydrant locations. Concerns were raised that maps of hydrant locations are not available locally and that when hydrants are located sometimes they are poorly maintained or inoperable. On the BIS system, there is a requirement to inspect open water sources at SOPs if that is identified as a source of water for fire fighters; it was queried by crews whether these checks were being done.
- 2.6.20 With water still the principal firefighting resource, crews are obviously concerned that any lack of knowledge of / confidence in hydrants could have adverse consequences to health and safety in any emergency situation. Without RDS carrying out 7 2 (d) visits, this local knowledge and confidence is being eroded. At one station, retained staff were used outside drill nights to find the hydrants in their fire ground and map them; this initiative was particularly welcomed by firefighters and given the level of concern, the Service could consider whether it could be rolled out 'across the board'.
- 2.6.21 The detailed hydrant information is not on the control database and Control need to log onto a different (Transportation & Estates) database to access it.
- 2.6.22 The Service is relying on 'local knowledge' gained by RDS firefighters during the course of their duties e.g. checking information on false alarm visits which make up high proportion of call outs but also from their lives outside the Service. This is one of the strengths of the Retained Service and an example was given to Inspectors of a house fire where RDS crew knew that residents were involved in civil war re-enactments and stored gun powder which meant they could respond to the incident in the most appropriate way. Nevertheless consideration should be given as to how RDS staff can become more involved in the risk information gathering process.
- 2.6.23 The Inspectors recognise that this will be a challenge because of the already limited time available and the other training pressures on that time but is important in the light of some of the concerns raised during the audit. The Service will also need to consider that because RDS crews have not carried out many risk familiarisation visits recently, some staff don't have the confidence to do them and would need appropriate training and guidance.

2.7 MEASURING PERFORMANCE / AUDITING

Is performance measured against agreed standards to reveal where and when improvement is needed?

- 2.7.1 The period of substantial organisational change undergone by Cornwall FRS has effectively involved a review of the majority of management arrangements within the Service. The reorganisation following those reviews meant that there has been little time for the new arrangements to become embedded prior to the inspection – this was particularly true of monitoring / auditing systems.
- 2.7.2 This is a key area on which HSE will focus during the follow up visit. Skills are monitored in a number of ways, mostly by the Supervisory Officers (see below) but also by watch managers and incident commanders. Attendance at events is captured within the MOST logs, recording the type of work individuals have undertaken during shouts. These are reviewed monthly for

whole time crews and quarterly for retained crews. Watch / Crew managers can undertake hot debriefs following an incident to highlight lessons learned, what was done well and what improvements were needed but these are not necessarily recorded.

- 2.7.3 The Service has set clear policy expectations for when and how debriefing is to be undertaken within Operational Training De-Briefing (OPS1/041) Index. Incident commanders conduct a formal debrief following a 4 pump or more incident to ensure organisational learning is captured. The Operational Resilience Group regularly reviews the findings of debriefing. The mechanism used by the Service to monitor the progress of formal de-briefs should ensure that recommendations for change are progressed promptly. There were a number of examples evidenced of incident debriefing leading to changes in policy, training, and procurement.
- 2.7.4 All of the staff and stations interviewed were positive and enthusiastic about the value of debriefing, both at an informal and formal level. Fire-fighters and crew managers cited examples of where they felt that views and opinions were clearly listened to.
- 2.7.5 BA skills audit was undertaken on wholetime fire-fighters earlier this year. This audit was being extended to RDS crews during the inspection period and some concerns were expressed by firefighters that the question sets had been changed before rollout to the RDS. The Service expects to communicate the results of the BA Audit upon completion and this will provide a good baseline for future training provision. Notwithstanding this audit, HSE would expect safety critical issues to be identified through routine monitoring.
- 2.7.6 The Service has a system of 'Supervisory officers' (from the flexi duty system) who effectively act as a support to (in general) one station each. Supervisory officers attend some drill nights and were able to explain their role and the extent of monitoring they undertake, which included monitoring the existing system of MOST documentation and any Personal Improvement Plans. Supervisory officers and watch managers are aware that PDR-Pro will be introduced in the near future as a database to replace MOST logs.
- 2.7.7 The pool of Supervisory Officers is also responsible for carrying out the programme of Operational Preparedness Audits (OPA) and Operational Effectiveness Audits (OEA) on stations other than those for which they are responsible. The OEA is assessing each watch at operational events. The OPAs are a review of station equipment and administration and should help to assess compliance with the policy at station level.
- 2.7.8 Due to the recent implementation of the Operational Preparedness & Effectiveness Audits, inspectors were not able to explore in detail how widely and to what benefit these have been adopted. That said, the Service has set clear policy expectations and has enthusiastically commenced the introduction of Operational Preparedness & Effectiveness Audits. The aspiration is for OEAs to be carried out quarterly by Station and Group Managers and for a Service-wide summary report to be written at the end of the first year's programme.
- 2.7.9 The majority of the staff and stations interviewed were positive and enthusiastic about the value of such audits, although a number of concerns were raised in relation to:
- The delay in receiving any written station feedback on preparedness audits, which means crews struggled to remember specific points for improvement.
 - The target frequency and coverage of effectiveness audits being met from the pool of supervisory officers available.
- 2.7.10 In relation to risk information, currently monitoring of the system appears to be mainly carried out by HQ functions. Desktop assessments for low risk premises do not appear to be subject to the same monitoring requirements as returns from stations. Sampling of the desktop or self assessments should be carried out to ensure that they are being used in accordance with the policy. Staff may require extra training and support with regard to this issue.
- 2.7.11 A performance monitor monitors the number of jobsheets / returns from stations. Targets on inspections to be carried out have been amended to make them more realistic because crews were not really meeting the targets set and there was concern that they were being asked to do too much.
- 2.7.12 Job sheets are given to Group Managers who then give them to their TIP co-ordinators who then pass them to watches. To date, this has made it hard to track numbers as there has been no feedback as to whom the job sheets have been passed. This has been picked up and a

meeting has now been held of all the nominated TIP co-ordinators. A performance monitor will be introduced for discussion at quarterly meetings.

- 2.7.13 Consideration should be given as to how the quality of information gathered and recorded can be monitored. Hopefully the revisions to the system will incorporate such checks.
- 2.7.14 Currently, four group managers are responsible for a group of approximately eight stations (of either duty system) in addition to the roles they undertake at tactical level within the Service. The number of risk premises inspections carried out is available to Group Managers who should be checking and monitoring. In reality it would seem that this has not been happening and that there has been quite limited monitoring of the system other than the checking of numbers of inspections completed.
- 2.7.15 In relation to all topics inspected, the Group Managers seem reliant on information from centralised functions and the monitoring carried out by the Supervisory Officer function. CFRS should consider whether it has developed sufficiently an effective set of key performance indicators in relation to safety critical operations / training for Group Manager / senior management oversight

Recommendations:

13. The Service should continue its work developing the Operational Preparedness & Effectiveness Audits as its own performance (and in due course improvement) standards.
14. The Service may wish to consider whether the pool of supervisory officers available to undertake the Operational Effectiveness Audits is sufficient to meet the targets it has set for itself.
15. CFRS would benefit from evaluating its active monitoring systems against family/regional group comparators, particularly in relation to key performance indicators in relation to safety critical operations / training for senior management oversight.

2.8 OTHER ISSUES

- 2.8.1 Poor drying facilities at some stations. Some other local building issues were discussed with management and assurances received that resolution will be achieved.
- 2.8.2 Crews reported waiting up to one month for laundry (dirty uniforms) to come back. This has been raised by stations and employee representatives with management, who have worked to resolve issues. However, crew at station level feel that the matter has not been satisfactorily resolved.
- 2.8.3 Dry suits are not on personal issue for water rescue and two dry suits are allocated to each 'first away' appliance – the water rescue vehicles at St Austell and Falmouth and the Rescue Tenders at Bodmin and Camborne. Firefighters feel insufficient suits available. The kit is eight years old. Service is aware of the difficulties, particularly with fit. A further stock of eight dry suits is available from Workshops, which can be mobilised to any incident. Further kit of 12 'telescopic' dry suits, which provides a better fit for many personnel, has been ordered. However, this is likely to go some way to alleviate the difficulties with kit currently issued.
- 2.8.4 These 'local' issues were not part of the inspection remit. Their satisfactory resolution by management will be revealed during the follow-up. The inspection team have already received evidence of resolution of an issue regarding work at height.

3 SUMMARY AND CONCLUSIONS

This report is based on a sample inspection which focused on specific operational topics. Based on this inspection we found Cornwall Fire and Rescue Service to be well structured, with a positive health and safety culture throughout the organisation.

The team recognised CFRS as a learning organisation. Particular strengths were identified in Policy, Policy review and debriefing. Throughout the inspection, staff at all levels were open and honest about the challenges CFRS is facing and how these are being dealt with.

The Portreath training facility is excellent; the feedback from CFRS staff indicates that HMS Raleigh is also highly regarded. The Service's decision to provide both carbonaceous and gas-fired compartment fire behaviour training allows firefighters to develop a complete appreciation of all aspects of fire behaviour. The inspection team consider this Good Practice.

During this inspection HSE identified fifteen recommendations for Cornwall Fire and Rescue Service. Those recommendations are listed below under 'Summary of Recommendations'. However, in order to assist CFRS with prioritising we believe there are three priority areas, namely:

1. A fundamental review of the Service's training needs analysis. The Service needs to ensure it has sufficient resourcing (in-house or contracted) to meet its training need.
2. The Service recognises that maintenance of skills training and formal assessments in incident command is a key development area. The Service should consider whether its current resource is sufficient to deliver their proposals.
3. With relevance to Specialist Appliances, the Service must ensure that employees are provided with adequate health and safety training if exposed to new or increased risks because of their role or station being changed.

Action now required by CFRS

The Service should produce an action plan that identifies how and when it intends to implement all the recommendations from this report. The action plan should be agreed with the lead inspector within a mutually agreed timescale. It is our intention to return to the Service in due course to ascertain progress with implementing the action plan.

4 SUMMARY OF RECOMMENDATIONS

1. The Service should consider consolidating the high-level policy statements on health & safety into one overall health and safety policy.
2. The Service should complete its fundamental review of its training needs analysis. This should be based upon the Service's risk profile and its Integrated Risk Management Plan. Of particular concern is that the Service has sufficient resourcing (in-house or contracted) to meet its training need.
3. The FRS should ensure that the requirement to attend relevant FBT training (and how it underpins BA competence) is clear throughout the organisation.
4. The Service must manage this varying understanding of 'non-competence' and should clarify how firefighters deemed 'non-competent' can be deployed (if at all) at operational incidents.
5. The Service should consider whether the current one day length of this course is sufficient to cover suitably and sufficiently all the required elements of fire behaviour training and the 'hot wear' required for BA refresher.
6. The Service should monitor whether any firefighters do not wear BA operationally at least once in every twelve months and take appropriate steps.
7. The Service should continue the work it is presently undertaking with local Services within the region to determine standards of competence acquisition and maintenance in incident command for Service Manager(s). This work should be given a high priority.
8. The Service should clarify the availability of the Operational Development Course for Crew Managers.
9. The Service should consider how it proposes to deliver the maintenance of skills training provided by the Officer Development Days to retained staff.
10. The Service must ensure that its system for assessment of incident command skills is not only effective but also tailored to the individual's capabilities and the type of incident to which they will be mobilised.
11. The Service should consider whether its current resource (of ten officers formally trained as Vector facilitators with only one who has completed a Level 3 BTEC Award and is therefore an accredited TCT facilitator) is sufficient to deliver maintenance of skills training and formal assessments proposed through the Tactical Command Trainer System.
12. The Service is required to ensure that employees are provided with adequate health and safety training if exposed to new or increased risks because of being transferred.
13. The Service should continue its work developing the Operational Preparedness & Effectiveness Audits as its own performance (and in due course improvement) standards.
14. The Service may wish to consider whether the pool of supervisory officers available to undertake the Operational Effectiveness Audits is sufficient to meet the targets it has set for itself.
15. CFRS would benefit from evaluating its active monitoring systems against family/regional group comparators, particularly in relation to key performance indicators in relation to safety critical operations / training for senior management oversight.