

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

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

10 – 12 NOVEMBER 2009

1. INTRODUCTION

- 1.1. This report presents the findings of an inspection of the management of health and safety at Oxfordshire Fire and Rescue Service (OFRS) carried out by the Health and Safety Executive in November 2009. The framework for the inspection was the guidance published by the Health and Safety Executive in '*Successful Health and Safety Management*' (HSG65).
- 1.2. The team members were Paul Williams, Tracey Cartwright, Malcolm Crowther and Sarah Wadham.
- 1.3. The inspection methodology included the examination of key relevant documents such as policy statements, risk assessments, guidance documents and minutes from health and safety committee meetings. Staff were also seen either for formal interviews or during the inspection of selected sample localities and work activities. This was a sample inspection and the report is therefore based on that sample. A draft report was passed to a senior OFRS manager to allow them to make comment on factual content and indicate any areas where we may have misinterpreted information given to us in the course of the inspection.
- 1.4. 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 competency in core fire fighter skills including breathing apparatus, associated procedures and compartment fire behaviour training;
 - Competence for incident command; and
 - Provision of risk critical information to inform operational decision making.
- 1.5. The conclusions and recommendations made are based on the sample of localities and activities inspected, where appropriate these should be applied across the full range of localities and activities. Recommendations represent the improvements required to enable Oxfordshire Fire and Rescue Service to comply with its duties contained within the generality of The Health and Safety at Work etc Act 1974 and the Management of Health and Safety at Work Regulations 1999.
- 1.6. We would like to express our thanks to the management and staff at Oxfordshire Fire and Rescue Service for their assistance and co-operation throughout the inspection.
- 1.7. Copies of this report are being sent to employee representatives, the fire authority and your occupational health and safety manager.

2. FINDINGS AND RECOMMENDATIONS

2.1 Health and safety Policy.

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

2.1.1 The Service has a system of policies and procedures, many of which have recently been updated, covering a number of key topic areas such as health and safety, learning and development, breathing apparatus, fire behaviour training and incident command.

2.1.2 However, some policies do not adequately reflect current arrangements and it appears that the documentation is still 'catching up'. For example:

- the Health and Safety policy does not identify key individuals' roles and responsibilities or adequately describe the current arrangements for linking health and safety to operational activities (the Management of Health and Safety at Work policy document, currently in draft, should address this);
- There is currently no policy which describes the overall operational training system;
- The policy/ procedure documents to support new projects such as Redkite have not yet been produced;
- The flowchart in the Incident Command policy has not been updated to reflect its application to all levels of the Incident Command assessment process.

Recommendations

R1 The Management of Health and Safety at Work policy document, currently in draft, needs to be updated, expanded to adequately describe how your arrangements link in with operational activities, and issued.

R2 A policy, or set of policies, describing how all operational training will be organised, delivered and evaluated should be issued.

2.2 Organising for Health and Safety

2.2.1 Control

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

- 2.2.2.1 Health and safety is included in annual appraisals at all managerial levels.
- 2.2.2.2 Wholetime Station Managers have been allocated to Retained Duty System (RDS) stations to improve supervision and training. There are proposals to introduce additional Wholetime Watch Manager posts at RDS stations to further improve organisation and training.
- 2.2.2.3 A competency-based mobilising system has been introduced, covering Wholetime and RDS firefighters, to ensure that crews have the required competencies before appliances are mobilised.
- 2.2.2.4 An Emergency Response Team (ERT) has been set up within Service Delivery to set operational response policy and review performance.
- 2.2.2.5 However, there appears to be a lack of overall control and coordination of training, with responsibilities being split between Service Delivery and Training Department.

Recommendation

- R3 Organisational arrangements need to be put in place to deliver operational training policy in a coordinated and consistent way.

2.2.2 Cooperation

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

- 2.2.2.1 The Health and Safety Committee is chaired by the Assistant Chief Fire Officer who has taken steps to improve its activities.
- 2.2.2.2 Representative bodies are consulted during the production of new policies and procedures. However, in view of the significant number of policies and procedures updated in the past few months, the time available for representative bodies to comment adequately needs to be kept under review.

2.2.3 Communication

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

- 2.2.3.1 Information is promulgated via various routes, including the Service website, bulletins, emails and routine text messages.
- 2.2.3.2 Representatives from OFRS are involved in national and regional forums.
- 2.2.3.3 Senior managers visit stations and work groups annually.
- 2.2.3.4 Staff from the Emergency Response Team and Training Department meet every 6 weeks to share information and discuss issues arising from operational and training activities.
- 2.2.3.5 Officers attend monthly training sessions during which current issues (including operational health and safety issues) are presented and discussed, thus helping to ensure consistency.
- 2.2.3.6 Other meetings which provide an opportunity for issues of concern (including operational health and safety issues) to be raised and discussed include the Retained Forum, which meets every 6 weeks, and the RDS Watch Managers group which meets quarterly.

2.2.4 Competence.

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

Health and Safety

- 2.2.4.1 Health and safety training has been provided at all levels of the organisation. Firefighters complete the RSPH Foundation in Workplace Health and Safety as part of their initial training. Crew Managers complete the IOSH Managing Safely course whilst Station Managers and above complete the NEBOSH General Certificate. Senior officers also complete the IOSH Safety for Senior Executives course.
- 2.2.4.2 The Service has competent advice from a health and safety adviser based in Oxfordshire County Council's Shared Services. Temporary additional resource has been obtained to address issues identified in the recent health and safety management audit undertaken by auditors from other Services in CFOA No 5 District.
- 2.2.4.3 The recent workload of OFRS' health and safety team has meant that time has not been available to develop a more strategic approach to health and safety. For example, a significant amount of

the Shared Services adviser's time is taken up with central auditing whilst the Technical Services Manager also has responsibility for the fleet and workshop.

Core Skills

- 2.2.4.4 The introduction of the Redkite system appears to have significantly improved arrangements to maintain and monitor individuals' training records. The system can be used to identify training needs and plan training sessions.
- 2.2.4.5 Watch Managers and Crew Managers deliver theoretical and practical station-based training. However, they have had limited training as trainers or assessors and there are currently no formal systems to verify the quality of training delivered.
- 2.2.4.6 RDS firefighters are required to demonstrate maintenance of competence against the same criteria as Wholetime firefighters. However, the Training Review Group has identified a gap between the ongoing training time required and the time available to RDS firefighters and this issue is currently being addressed.
- 2.2.4.7 The skills maintenance matrix, covering all required operational training, has been revised after systematic analysis of the frequency of training. This new skills maintenance matrix will be implemented in April 2010.
- 2.2.4.8 A training competency framework is to be introduced by April 2011. This systematic approach will set out the competencies and equipment required for key tasks and identify the training material available.
- 2.2.4.9 There is currently no formal assessment of the competence of Training Centre instructors.

Breathing Apparatus

- 2.2.4.10 All new Wholetime and RDS firefighters receive an initial 2-week training course in breathing apparatus (BA). The BA instructors have been trained at the Fire Service College.
- 2.2.4.11 A BA Team Leader system has been introduced which involves an additional assessment of competence.
- 2.2.4.12 BA maintenance training statements are included on the Redkite IT system and are used to plan drill sessions.
- 2.2.4.13 The Training Centre has provided a training CD for station-based pre-learning prior to firefighters attending BA refresher training. However, it appears that some RDS firefighters have arrived for

their BA refresher training without having done the required pre-learning.

2.2.4.14 The current arrangements for providing BA refresher training do not meet the standards specified in FSC 18/2009 and 17/1970. Every 3 years Wholetime firefighters attend a 1-day BA refresher course, whilst RDS firefighters attend an evening session lasting approximately 3 hours. FSC 17/70 recommends 2-3 days training every 2 years. A number of RDS firefighters have failed their BA refresher training during the current 3 year programme and have been taken off the run. At the time of the inspection the Service was in the process of improving BA refresher training, having already recognised shortcomings. However, the Service's initial action plan did not, in our opinion, effectively align its BA refresher training with FRS national guidance. As a result, due to the safety-critical nature of this training, HSE gave serious consideration to serving an Improvement Notice. However, the Service immediately produced an improved action plan that adequately addressed all the shortcomings, and provided assurance that it would be implemented effectively, so that we did not then consider it necessary to take enforcement action.

2.2.4.15 As part of the proposed changes, positive pressure ventilation (PPV) training is being removed from the 3-year refresher training programme. The Service needs to ensure that the standard of PPV refresher training is maintained if it is to be delivered on station.

Compartment Fire Behaviour Training

2.2.4.16 Every 3 years all Wholetime and RDS firefighters receive a one-day fire behaviour training course at a commercial specialist facility.

2.2.4.17 The fire behaviour training instructors have received external training and a system is being introduced to monitor their competency.

Incident Command

2.2.4.18 A permanent Incident Command assessment facility has been provided. Level 1 Incident Commanders have completed their competence assessments and Level 2 assessments are due to be completed by March 2010. Some Level 3 Incident Command training has been provided by the Fire Service College and in-house assessments are due to be undertaken during 2010.

2.2.4.19 Incident Commanders failing a Vector assessment and two subsequent 're-sits' are removed from incident command until they have received further training and passed the assessment.

- 2.2.4.20 A mentoring system has been introduced for Incident Commanders on temporary promotion and for RDS junior officers on stations. There are also specific competency requirements which must be achieved, including passing a Vector incident command assessment, before firefighters can act up as Crew Managers.
- 2.2.4.21 The Incident Command Development procedure, which gives an overview of the arrangements, does not fully describe the current training system.

Recommendations

- R4 The resourcing of the health and safety team should be reviewed to ensure that the Strategic Leadership Team (SLT) receives sufficient advice on strategic health and safety matters.
- R5 The project to introduce a training competency framework needs to be progressed according to the stated timescale.
- R6 The Service needs to put in place systems to assess the competence of those delivering operational training at station level as well as at the training school.
- R7 The Service must ensure that adequate training is provided to maintain competencies in safety-critical areas. The outcome of the RDS training-needs review should assist in this.
- R8 The action plan to meet the requirements of FSC 18/2009 by 1st April 2010 needs to be implemented in line with the timescales contained within it and the Service should ensure that the content of the BA refresher training courses achieves the same outcomes as those envisaged by FSC 17/1970.
- R9 The Incident Command Development procedure should be reviewed and updated to describe the current training system.
- R10 The Incident Command training programme needs to be progressed in line with the timescales set out in the Training Department Action Plan.

2.3 Planning and Implementing Risk Controls

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

Health and Safety Planning

- 2.3.1 A review of RDS training requirements and operational needs forms part of the 2009/10 Integrated Risk Management Plan for OFRS.

2.3.2 There is currently no strategic health and safety management plan, although we understand that the Technical Services Manager has already been tasked with producing one.

Risk Assessment

2.3.3 The service's existing generic risk assessments are being reviewed against the new national generic risk assessments as and when they are issued.

2.3.4 Instructors are IOSH (Institution of Occupational Safety and Health) trained and undertake risk assessments before carrying out training events. There is currently no formal mechanism for sharing training risk assessments.

Risk Information

2.3.5 The Service has aligned its policies and practices to the South East Region framework for risk information which will help with consistency at cross-border incidents.

2.3.6 Risk information is collected from premises by Fire Protection Officers and firefighters using a Safety Audit and Data Gathering Form. Premises are then assessed and rated into risk categories, with the frequency of re-inspection based on the risk rating. Training has been provided for the collection of risk information, but some firefighters are still unsure about how to record this information properly on the Safety Audit and Data Gathering Form. Some of the risk information collected has been found to be assessed incorrectly on occasions.

2.3.7 The 7(2)(d) cards are being converted into a new format which more clearly identifies risk. Risk cards are currently held as hardcopies on the appropriate appliance and in the Control Room. Mobile data terminals are due to be provided in 2010.

2.3.8 Risk information not available on appliances can be faxed through from the Control Room. The GRINFO system provides additional risk information to operational crews.

2.3.9 The AQ5 risk information database is linked to the County National Land and Property Gazetteer (NLPG) which lists over 347000 premises. The NLPG is not yet being used to identify new premises for risk rating.

Recommendations

R11 The Service needs to draw up a strategic health and safety plan to develop a more systematic approach to the management of risk and establishing priorities.

- R12. The Service should explore the potential of the NLPG as part of a more proactive approach to seeking out previously unidentified sites which present potentially serious risks to firefighters.
- R13. All staff who collect and assess risk information need to be adequately trained for the task.

2.4 Measuring Health and Safety Performance

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

- 2.4.1 Oxfordshire County Council's monitoring and verification form is completed annually by Shared Services using resource allocated to the Service. The form appears to be very generic, time consuming to complete and not sufficiently targeted to the Service's needs. Use of this form should therefore be reviewed in consultation with Shared Services.
- 2.4.2 The Redkite IT system has recently been introduced and appears to have been well received at all levels. This provides a tool for active monitoring and identifies any gaps in individuals' training.
- 2.4.3 Trends in Incident Command assessment are being analysed.
- 2.4.4 The Incident Command Development Team can complete a training needs form if shortcomings in competency have been identified at an incident.
- 2.4.5 The training needs form provides effective feedback on individuals' training needs, but there does not appear to have been any overall analysis of returns to identify Service-wide trends and training needs.
- 2.4.6 An operational audit system was introduced in 2006 to monitor specific generic risks and safety-critical themes, based on identified accident trends or changes to policy or procedures. The audit officers have not, however, been given any formal training in auditing. An initial briefing was given, but there have been no catch up sessions for those promoted later.
- 2.4.7 The audit officers are currently all Flexible Duty Officers or Incident Support Officers. For operational reasons, only Incident Support Officers are called upon to audit incidents occurring between 11pm and 6am.
- 2.4.8 The audit procedure document states that audits should be suspended if an incident develops rapidly, but it does not say what immediate action must be taken if safety-critical failings are seen.

- 2.4.9 An operational debrief system was introduced in 2007 to provide feedback on good practice, areas for improvement and any associated training needs. The procedure document states that the decision to hold a structured debrief rests with the Incident Commander. There do not appear to be other triggers for initiating a structured debrief.
- 2.4.10 The health and safety team, and others who may have an involvement in wider issues related to particular incidents, have not been regularly invited to attend structured debriefs.
- 2.4.11 Station Inspections are undertaken by the Station Managers and verified annually by Service Delivery.
- 2.4.12 A standard analytical risk assessment (ARA) form is used by Oxfordshire, Berkshire and Buckinghamshire which helps to reduce possible inconsistencies in approach at cross-border incidents. Completed ARAs are returned to the Emergency Response Team for monitoring purposes. The quality of the information recorded in ARAs varies. Examples of completed ARAs seen made too much use of standard hazard phrases e.g. electricity, without giving more meaningful information about site-specific hazards, e.g. overhead power lines. There is no formal system to feedback individual problems identified with the quality of information contained in ARAs.

Recommendations

- R14 Greater use should be made of the information from training needs forms to analyse and identify Service-wide trends and training needs.
- R15 The Service should review the audit officer arrangements to ensure that they receive sufficient training to carry out their role effectively.
- R16 The procedures for initiating, inviting attendees and conducting formal operational debriefs should be reviewed to ensure that the Service is getting the maximum amount of learning from these events.
- R17 The content of the analytical risk assessment records should be reviewed to ensure that they contain meaningful and useful information.

2.5 Auditing and Reviewing health and safety performance

Are lessons learnt from the performance measurement and auditing processes which are effectively put into practice?

- 2.5.1 The Service is audited as part of CFOA No 5 District's health and safety management audit approach, using RoSPA's Quality Safety Audit system.

- 2.5.2 The Emergency Response Team's role includes looking at national issues and undertaking gap analyses.
- 2.5.3 A review of the training requirements and operational needs associated with RDS is being undertaken.
- 2.5.4 Quarterly accident statistics are reviewed at the Safety Committee.
- 2.5.5 The outcomes of a number of debriefs and audits have resulted in procedural changes. For example, a whole time appliance will now always attend a structure fire and Control have to be informed if the rapid deployment procedure is used.
- 2.5.6 The BA audit summary report did not adequately highlight the significant failings identified at some of the incidents. This could have given a misleading impression.

Recommendation

- R18 Operational audit summary reports must adequately highlight any failings identified and should not focus solely on statistics.

3. SUMMARY AND CONCLUSIONS

- 3.1 The findings of this inspection lead us to believe that Oxfordshire Fire and Rescue Service has a positive health and safety culture which it is striving to improve. The Service has a particular strength in the area of communication of information and had already started to introduce quality systems to improve consistency.
- 3.2 As a result of this inspection, HSE has made 18 recommendations which are listed in full at the end of this report. We believe that the key areas needing improvement at this time are:
- Implementation of the training policy in a more coordinated and consistent way;
 - Ensuring the competence of those delivering operational training;
 - ensuring that the new BA refresher training programme achieves the same outcomes as those envisaged by FSC 17/1970; and
 - undertaking health and safety planning at a more strategic level.
- 3.3 Oxfordshire Fire and Rescue Service should now produce an action plan to identify how and when it will implement the recommendations made in this report. This plan could form part of the health and safety strategy currently being drawn up by the Technical Services Manager for ratification by SLT.

Recommendations

- R1 The Management of Health and Safety at Work policy document, currently in draft, needs to be updated, expanded to adequately describe how your arrangements link in with operational activities, and issued.
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- R3 Organisational arrangements need to be put in place to deliver operational training policy in a coordinated and consistent way.
- R4 The resourcing of the health and safety team should be reviewed to ensure that the Strategic Leadership Team (SLT) receives sufficient advice on strategic health and safety matters.
- R5 The project to introduce a training competency framework needs to be progressed according to the stated timescale.
- R6 The Service needs to put in place systems to assess the competence of those delivering operational training at station level as well as at the training school.
- R7 The Service must ensure that adequate training is provided to maintain competencies in safety-critical areas. The outcome of the RDS training-needs review should assist in this.
- R8 The action plan to meet the requirements of FSC 18/2009 by 1st April 2010 needs to be implemented in line with the timescales contained within it and the Service should ensure that the content of the BA refresher training courses achieves the same outcomes as those envisaged by FSC 17/1970.
- R9 The Incident Command Development procedure should be reviewed and updated to describe the current training system.
- R10 The Incident Command training programme needs to be progressed in line with the timescales set out in the Training Department Action Plan.
- R11 The Service needs to draw up a strategic health and safety plan to develop a more systematic approach to the management of risk and establishing priorities.
- R12 The Service should explore the potential of the NLPG as part of a more proactive approach to seeking out previously unidentified sites which present potentially serious risks to firefighters.
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- R18 Operational audit summary reports must adequately highlight any failings identified and should not focus solely on statistics.