Introduction

It is vital that Members being asked to agree to the proposed changes to fire service arrangements have a reasonable and evidence based case on which to make that important decision.

I make this submission because I am concerned about the detrimental impacts for Victoria of what is proposed and because I believe that I can provide you with a snapshot of some of the practical impacts of the proposed changes on service delivery in the short term, and of the complex range of issues that will need to be resolved before any actual change should be actioned in order to avoid any drastic failures during the approaching fire danger period. Finally I can also provide a perspective of the longer term impacts.

I retired from a very senior career position with CFA in December of 2005 and I now serve as a volunteer. At the time of my retirement I had relinquished my position as Area Manager — Gippsland, a position equivalent to what is now referred to as an Assistant Chief Officer. Prior to being appointed to that position I had undertaken the role of Deputy Chief Officer — Operations for approx. 4 years. During my career and following my retirement I held accreditation as an Incident Controller, Level 3 and was a member of the Chief Officer's Real Time Performance Monitoring panel that audited and mentored members of Incident Management Teams.

My knowledge and understanding of the integrated system, in particular of the critical factors that influence the commitment and sustainability of volunteers, was highly valued by the organisation and I spent my last 12 months in Headquarters sharing that knowledge with members of the Executive Team.

I believe my background enables me to provide to the Committee an unbiased, accurate and comprehensive insight into how the proposed changes will actually affect frontline service delivery and day to day working relationships. I am also in a position to know how the industrial logjam has impacted on CFA career staff and their working relationships with volunteers since my son is a Senior Station Officer with CFA.

TOR 1 Impact on Fire Service Delivery

Fragmentation of service delivery in country areas will generate potential for confusion and increase the likelihood of duplicated effort and/or gaps in service delivery. There will be boundaries where previously there were none, two dispatch and reporting lines where currently there is one. Other emergency service stakeholders and members of the public will see this as unnecessary red tape.

Within the organisations the following are relevant observations.

- FRV Brigades in provincial towns will have only the number of career firefighters on shift. They
 can request assistance from CFA Brigades but will not have the intimate knowledge of the
 capabilities and skills of the responding personnel.
- The current CFA Integrated Brigade has the career personnel PLUS the small army of volunteer members who can respond and the career staff know, have trained with, and can allocate tasks to because they are aware of who holds what competencies.
- The two organisations will be operating on different radio networks and reporting to different dispatchers creating potential for confusion, duplication, or failure to address a need.

- Appliances will require an additional radio or they will need to be re-programmed to enable switching to the other services channels in order to communicate. Command vehicles will require multi radio operating capability.
- Existing integrated stations act as a point of referral and advice for volunteers and also serve as Ops Points / Local Command Facilities. eg. Pakenham, Melton, Warrnambool, etc
- Response procedures have not yet been publicised, however if the co-located CFA brigade is not simultaneously responded to calls with the FRV brigade then there will be an effective reduction in response capability which is not in the interests of improved community safety.
- Currently when an integrated CFA brigade is paged for a call the career staff respond
 immediately and the volunteers respond as quickly as possible to the station and take additional
 vehicles. This means that the career staff can be quickly backed up by several volunteers in
 additional appliances to provide the human resources needed at a developing fire situation. This
 is the clear advantage of the current integrated system.
- In provincial cities that are isolated from other FRV brigades it is likely that the existing CFA staff numbers transitioning to FRV will have to be supplemented with additional career staff to maintain current response numbers.
- Any response by neighbouring CFA brigades will constitute a delayed response compared to what happens now because of time and space associated with the travel distances.
- UFU policy and the current EBA both preclude career staff from taking direction from volunteers. If transitioning staff are made to adhere to this then the current level of support provided by CFA Integrated brigades to volunteers would be negatively affected.

TOR 2 Effect on volunteer engagement and participation in fire service delivery

Volunteers are motivated by their own perception that the time they are willing and able to commit and the service they provide is valued by the organisation. They need to feel that they are part of an effective team, that their participation is making a difference, that they are welcomed and treated with respect and that their participation generates a valued return (satisfaction) to them.

The integrated model provides these things. CFA career staff and volunteers work closely together and as one because they are part of the same organisation with common goals and procedures. They share facilities, they train together and they develop a trusting relationship that they each rely on during emergencies. The proposed model will damage this close relationship. It will create barriers and impair the existing quality of service delivery rather than improve it.

Consider the following:

- Co-location will require the division of assets into "yours and mine" as they are allocated to FRV or CFA.
- It will create unnecessary conflict about ownership of equipment that has been funded by the Brigade and of the funds held in Brigade accounts, sometimes quite significant amounts reserved for the replacement of Brigade owned vehicles.
- Most CFA Specialist vehicles and support vehicles were originally initiated and funded by the Brigades themselves.
- The different uniforms will visually cue the division of the existing team.
- Medium to longer term the FRV personnel seconded to CFA District Management roles will lack the high level of empathy and understanding required to engage appropriately with volunteers in a way that will quickly engender mutual trust and respect. This will have a detrimental impact on the development of working relationships with volunteers.

- Operations Officers and Managers, Instructors and others working with volunteers need to have a strong empathy and belief in the capability and competence of volunteers. Their perception of their role must be one of being a mentor and facilitator charged with the responsibility of lifting every volunteer to achieve their full potential.
- A wholly career service breeds a culture of giving and receiving of orders and directions. Managing volunteers requires a culture of an asking "Will you...." Approach rather than a telling "You will...." approach. Those with a boss / subordinate mentality will have difficulty engaging with volunteers and earning their respect.
- This begs the question of how staff are assessed as suitable for secondment to volunteer management roles in CFA and who will actually make the selection. Will it be by FRV or by CFA?

Restrictions on volunteer involvement in Command and Control roles eg Strike Team Leaders and Sector Commanders; associated with avoiding conflict with the UFU have limited the opportunities for volunteers to get hands on experience despite having completed the same training as the career staff. This has made it more difficult to attract volunteers seek to undertake training for roles that they see little opportunity to actually undertake.

Under the proposed changes FRV firefighting staff will have had minimal experience with rural environment wild fires and working with volunteers. When appointed to CFA District positions they will have to work effectively with Volunteers and be expected to have credibility as Incident Managers for major wildfire situations. The proposed arrangements are a backward step in terms of the effective management of the threat of bushfire to Victoria.

In the medium to longer term the proposed arrangements are highly likely to discourage volunteer involvement in order to establish a need for even more career staff. Certainly, the required attitudes and leadership attributes needed by District staff working with volunteers are unlikely to be developed within the culture of a wholly staff FRV. **That is the biggest failure of the proposed model.**

The current CFA integrated approach exposes CFA staff to a range of contacts with volunteers and the provincial centres/stations, in particular, are critical to developing the appropriate attitudes and skills needed by the organisations future leaders and managers.

Should FRV actually be established as proposed then in my view it would be essential to enable CFA to appoint any suitably qualified and experienced person to the positions of Operations Officer and Operations Manager. This would require significant changes to the current EBA. Note that this would not preclude the appointment of FRV personnel should they be assessed as the most suitable person.

If the FRV EBA continues to cover CFA positions how does this improve the situation? Potentially it creates a worse situation where career staff are not under the direct control of the CFA Chief Officer. This is an intolerable situation in relation to the maintenance of discipline and good order and is an unsuitable environment for establishing trust, respect and teamwork between career staff and volunteers that are co-located or in adjoining brigades. It is more likely to create competition or feelings of "them and us".

The changes are too significant to even contemplate rushing them through in a half-baked manner in order to have them in place for the approaching fire season.

TOR 3 Short term and long term cost impact on fire service provision

The Capital Costs for additional staff facilities, for station extensions and for additional appliances and equipment have not been accurately identified. They cannot have been because the detail of the changes has yet to be determined.

For instance, CFA currently appoint staff to stations on the basis of cross manning of appliances. This means the on duty staff crew whatever type of vehicle or combination of vehicles is required for the call. Volunteer members make up the crew numbers or respond additional vehicles as necessary.

MFB allocate staff on a per appliance basis. Assuming that the FRV EBA carries over the clauses and arrangements in the MFB EBA there will be an immediate need for an undetermined number of additional personnel. This will incur a very large cost penalty for training and equipping each additional person, will create a service delivery vacuum or a very large overtime bill in the short term. The impact on recurring costs is also an unknown factor but is sure to be a considerable amount.

Additional personnel will require a significant capital cost to modify existing facilities in order to be able to accommodate them since the existing stations were built to cater for the lower numbers required by the CFA integrated staffing model.

Then there are the costs associated with providing additional vehicles for the CFA brigade once existing vehicles have been transferred to FRV. Motor room extensions will incur additional costs that I would guess have not been budgeted for.

If any of these capital costs have been accounted for it will be a first because previous staff increases have only been calculated for the salaries and on costs of the extra numbers, except where staff were being appointed to a brigade for the first time.

Changes to the communications systems, radio, alerting and IT are another set of costs that are generally underestimated.

These are just some of the costs associated with the proposed changes that in effect are setting up duplicated networks and systems when the current systems have been developed and refined in response to the findings of numerous inquiries to actually achieve economies of scale and efficiencies in operations. **The proposed changes are taking us backwards.**

Victorians already pay a premium for the fire services currently in place. (Ref. Productivity Commission report 2017)

The provisions of the Emergency Management Act provide for the achievement of rationalisations and efficiencies between services and there is evidence of this having been achieved. CABA standardisation, vehicle design consistencies, Emergency Medical Response procedures and equipment, for examples.

TOR 4 Underlying Policy rationale

Only last year the Government's own response to the O'Byrne report was that the two existing fire services needed to be maintained because there were distinct differences in culture and mode of operation. There was no criticism of the standard of service delivery provided by either fire service.

There have been many statements made in recent time claiming that the changes are about improving service delivery however there has been no actual evidence presented that justifies the need for such significant changes and also no evidence or even explanation of how the changes will or can deliver improvements. Consequently, there is no logical basis for the drastic changes proposed.

It seems the proposed changes are based on an acceptance of the content of the statements. Take the following made by Commissioner Lapsley. "The key to success is integration – that we all work together to manage the incident." If that be the case then why dismantle a system based on the effective integration of career and volunteer.

If effective integrated operations are indeed the key to success then we should be retaining the arrangements that have been enhanced and improved over the period since Black Saturday under the watchful eye of Mr Lapsley. Arrangements that have been certified by Mr Comrie as improvements and that have satisfactorily addressed the recommendations of the Royal Commission and the government's response to those recommendations.

CFA have demonstrated the success of their integrated model of service delivery, most notably in recent time at the Gas Tanker incident near Hastings. What then is the rationale of transferring CFA career personnel to a new organisation and severing the close working relationships that have taken 70 years to establish and develop?

The underlying rationale would appear to be a misguided attempt to deal with a difficult industrial situation rather than service delivery.