



# Legislative Council Environment and Planning Committee

**Hearing date:** 1/05/2026

**Questions taken on notice**

**Directed to:** Fire Services Implementation Monitor

**Received date: [office use only]**

## 1. P.44 Sarah Mansfield

**Question:** Thank you. And thank you for appearing today. Mr Blair, you indicated that in your reports you have made recommendations about legislative reforms that need to take place. When did you first identify those legislative reforms that were required?

**Niall BLAIR:** Pretty early. I could come back and get the exact dates for you-

**Response:** It was in my first annual report (2020–21) where I identified challenges and risks pertaining to the agencies' delivery of implementation plan actions, particularly in relation to service level delivery agreements and CFA delegations, due to the constraints of existing legislative instruments, however it was from my 2021–22 annual report where I made recommendations about legislative reforms:

*The Minister should nominate an appropriately authorised, representative and accountable strategic governance body that: addresses issues where there are broader, strategic, whole-of-government barriers to implementation (that is, ability to drive legislative change to complete an outstanding service delivery agreement).<sup>1</sup>*

I have continued raising the need for legislative changes in my subsequent annual reports. In my 2022–23 annual report I identified that:

*Change to several legislative instruments is required to enable clear end-to-end service delivery as envisaged by the transfer of functions and staff to FRV at the initiation of the reform. These legislative issues apply to functions relating to dangerous goods, land use planning and caravan parks in the CFA area of operations.<sup>2</sup>*

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<sup>1</sup> FSIM, [Annual Report 2021–22](#), p. 9.

<sup>2</sup> FSIM, [Annual Report 2022–23](#), p. 17.

## **Additional questions**

### **Melina Bath**

Reform Success vs Reform Completion

1. Mr Blair, throughout the 2024–25 Annual Report you note that all Year 2–5 actions have been “acquitted or transitioned to business as usual”.
  - From your independent perspective as Monitor, does acquittal equate to successful reform outcomes?

**Response:** Please refer to the following excerpt from my 2024–25 annual report:

*With the end of year 5, the agencies have now acquitted all actions and either completed or transitioned to business as usual any remaining deliverables in the Year 2–5 Implementation Plan. They are embedding key programs such as the CFA’s training programs and FRV’s health model, strategies such as FRV’s Diversity, Equity and Inclusion Strategy and organisational initiatives such as the CFA’s Operating Model, to lay the foundations for sustained positive change. But it is important to remember that the reform is more than the implementation plan actions alone.*

*Going forward from the conclusion of the Year 2–5 Implementation Plan, continued and meaningful collaboration that is guided by the principles of a complementary fire services approach will be important. Agencies will need to carry on planning effectively for the challenges facing them now and into the future, including climate-related risks, changing community risk profiles, an ageing career and volunteer workforce, and to ensure Victorian communities receive a timely and efficient service. I encourage the agencies to reflect on their progress and achievements from 5 years of fire services reform (FSR) and to harness this energy to keep driving forward.<sup>3</sup>*

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<sup>3</sup> FSIM, [Annual Report 2024–25](#), p. 3.

- How do you distinguish, in your monitoring work, between procedural completion and substantive improvement?

**Response:** To-date, my annual reports have focused on monitoring procedural completion. Going forward from the conclusion of the Year 2–5 Implementation Plan, my focus will shift to monitoring efficacy of completed actions – that is, whether the actions implemented produced a desired or intended outcome.

The *Fire Rescue Victoria Act 1958* (the FRV Act) requires the FSIM to publish quarterly reports. These are developed using data provided by the agencies against performance measures set out in their respective Outcomes Frameworks. The quarterly reports provided a further mechanism for me to monitor and assess the agencies continuing fire services reform work.<sup>4</sup>

- Were you satisfied that government provided outcome-based evidence, rather than compliance documentation, for action completion?

**Response:** The formal acquittal of actions does not sit within the legislative remit of the FSIM. The decision and evidentiary threshold for acquittal sits as a joint responsibility between the Department of Justice and Community Safety (DJCS), and the fire agencies.

Notwithstanding, I made my own independent assessments on the progress and formal acquittals of each of the implementation actions as detailed in my annual reports. As part of my independent assessments, I requested further information from the fire agencies.

- If you were designing the framework again, what outcome measures would you require that are missing?

**Response:** The FSIM was established under section 122 of the FRV Act to provide the Victorian Government and community with independent assessment of the fire services reform implementation progress.

However, the design of the framework and its contents (implementation plans) were decisions for government and best informed by the expertise of the fire agencies.

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<sup>4</sup> Refer to the [FSIM publications](#) website.

## Workforce Capacity, Vacancies and Fatigue Risks

2. You have consistently identified vacancy and non-relief staffing issues as joint operational risks. After five years of reform, why do these issues remain unresolved?

**Response:** Please refer to the following excerpt from my 2024–25 annual report:

*The problem of filling vacancies and providing relief, including to cover long service and unplanned leave, at the commander and assistant chief fire officer levels in the CFA remains critical. While factors other than the design of the secondment model have contributed to this issue, particularly in peri-urban areas, the reform has not reduced the impact of workforce shortages on fire agencies.*

*As noted in my previous annual report, several mechanisms have been trialled to address this issue. Funding for more positions early in the reform period, increased reporting at the Heads of Agency Steering Committee and the CFA's Capability Statement in recent years, have all enabled some, but not enough, progress to occur. These mechanisms have not been able to overcome or significantly address the barriers, including an ageing workforce and the need for FRV to consult with the UFU and reach consensus via the Operational Consultative Committee to providing adequate staff to the CFA.*

*I have found it frustrating to observe how the structure of the secondment model has curtailed the CFA's involvement into how vacancy and relief issues are managed. Currently, the CFA has limited input in the recruitment, and skills set, of FRV staff seeking secondment into the CFA. And whilst the CFA has operational oversight of seconded staff through the CFA Chief Officer, there are complexities that limit the ability to allocate resources to where they are most needed.<sup>5</sup>*

- Were these workforce risks foreseeable at the time reform commenced?

**Response:** These issues preceded fire services reform.

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<sup>5</sup> FSIM, [Annual Report 2024–25](#), p. 8.

- Did you ever form the view that workforce modelling underpinning reform was inadequate?

**Response:** In my 2020–21 annual report, I noted the workforce challenges and recommended that comprehensive modelling be undertaken by both agencies:

*FSIM notes that CFA and FRV faced considerable systems, process, and human resource challenges in implementing the Agreement, including filling ACFO and Commander vacancies, and providing Commander relief to cover planned annual and long-service leave, and unanticipated sick leave.*

*The Secondment Agreement notes that ‘the parties will ensure that there is no reduction to the operational and management support, including administrative, training, community safety and fire safety support to CFA and its volunteers’ but in regard to the management of Commander vacancies and relief, this has not been the case. When developing the Commander relief secondment model, it does not appear that CFA and FRV undertook a comprehensive needs analysis of Commander relief requirements, and this should be addressed as part of the agreement’s supplementary arrangements.*

*FSIM acknowledges that CFA and FRV have discussed the ACFO and Commander vacancy and relief issues through various meetings throughout the reporting period, however vacancies remain, and relief arrangements remain unresolved. If not resolved, ongoing vacancy and relief issues will continue to impact CFA preparedness activities.*

*CFA and FRV must finalise a model that provides for sufficient vacancy management and Commander relief to ensure effective and efficient operational management, maintain staff safety and wellbeing, and avoid further Commander annual leave accrual. This may require comprehensive modelling of Commander relief requirements.<sup>6</sup>*

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<sup>6</sup> FSIM, [Annual Report 2021–22](#), p. 62.

- What risks does persistent non-relief staffing pose to firefighter safety and community outcomes?

**Response:** Please refer to the following excerpt from my 2024–25 annual report:

*The flow-on effects are concerning, particularly in relation to fatigue management and reduced wellbeing outcomes for those who cover these vacant or non-relieved positions, particularly in the country area of Victoria (CAoV), where they may have to travel long distances. The community ultimately also experiences these consequences, with a lack of senior decision-makers available on the ground for operational incidents.*

*A revolving door of relievers can also impact the resolution of CFA's volunteers' issues or concerns, with a lack of CFA command staff at middle management levels. Volunteers face the prospect of having their issues delayed, and there are potential long-term impacts on recruitment if membership with the CFA is known to involve unrelieved stress and burnout. Noting that volunteer numbers improved in 2025, the challenges presented by the secondment model in conjunction with an ageing workforce, could drastically reduce recruitment in the coming years.<sup>7</sup>*

- How have you advised government that workforce issues represents a failure of reform design, rather than implementation lag?

**Response:** I have continuously identified limitations of the reform, including design, in my annual reports. Refer specifically to the Challenges section of my 2024–25 annual report, which has a sub-section focusing on workforce vacancy and relief issues.<sup>8</sup>

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<sup>7</sup> FSIM, [Annual Report 2024–25](#), pp. 8–9.

<sup>8</sup> FSIM, [Annual Report 2024–25](#), p. 8.

## Interoperability Between CFA and FRV

3. Your report refers to agencies coming together late in the reform period to “work through barriers” to interoperability. Why in your opinion, did it take until the final year for these barriers to be addressed?
- Were these barriers structural, cultural, or governance-driven or all three?
  - In your assessment, did the reform model itself create interoperability challenges?
  - How much reliance has been placed on goodwill and relationships rather than enforceable structures?

**Response:** I don't necessarily agree that it took the agencies until the final year of the Year 2–5 Implementation Plan to address barriers to interoperability.

In the first year of reform, I identified barriers to interoperability in my 2020–21 annual report.<sup>9</sup> In my subsequent annual reports, I have monitored, recognised and assessed the work of the agencies to deal with these barriers.

Please refer to the following excerpts from my 2024–25 annual report:

*Actions involving the secondment model and other mechanisms central to interoperability and complementary fire services have relied on strong inter-agency collaboration. I have observed valuable collaboration between the CFA and FRV on matters including the setting up of governance arrangements, protocols and procedures that support operational and corporate staff working together. Despite the complex and sensitive content, I have clearly perceived this collaboration, making it an obvious key achievement of FSR to this point.<sup>10</sup>*

*The Priority Three actions are critical to interoperability between the CFA and FRV and the success of a complementary fire service.*

*Overall, the actions completed have empowered the agencies to embed processes and frameworks that facilitate interagency operations and strengthen their collective capability to support sector-wide responses.*

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<sup>9</sup> FSIM, [Annual Report 2020–21](#), pp. 7, 70–72.

<sup>10</sup> FSIM, [Annual Report 2024–25](#), p. 7.

*We acknowledge and highly commend all parties on the substantial progress they have made since the start of FSR in progressing a complementary fire service that meets the needs of the community and responds to new challenges and risks. However, we also note the complex challenges of harmonisation and the secondment model.*

*We acknowledge there is still work to do as part of making the actions BAU and encourage all parties to continue on their journey towards the success statement beyond the Year 2–5 Implementation Plan.<sup>11</sup>*

*It is crucial to remember that the end of the Year 2–5 Implementation Plan doesn't mean true interoperability and complementary fire services has been completely achieved. In fact, the plan has ended without long-term and sustainable solutions for many of the issues that I have identified across my 5 annual reports. The end of the plan does not give 'a clean bill of health' for FSR. Workarounds are still in place and are far from efficient or suitable for the long term. In the absence of changes to legislation or the industrial environment, these issues will remain and will require ongoing attention and monitoring.<sup>12</sup>*

#### Volunteers, CFA Capacity and Cultural Impact

4. You note that capacity, capability and culture have remained persistent challenges throughout the reform period. How confident are you that CFA's volunteer model has been strengthened rather than destabilised?

**Response:** The legislative remit of the FSIM does not require me to evaluate this, only monitor. Notwithstanding, I do not believe sufficient time has passed since the start of fire services reform to effectively measure this.

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<sup>11</sup> FSIM, [Annual Report 2024–25](#), p. 30.

<sup>12</sup> FSIM, [Annual Report 2024–25](#), p. 10.

- Did you observe reform fatigue or disengagement among volunteers during monitoring?

**Response:** I identified the issue of affected morale among volunteers particularly in the first 2 years of reform.

Please refer to the following excerpt from my 2020–21 annual report:

*CFA and FRV faced complex implementation challenges to finalise agreements to oversee the transfer of people, assets, liabilities, and services. In many instances, these challenges led to CFA and FRV developing ‘work arounds’ via interim arrangements to maintain service capability and capacity. While these interim arrangements allowed service delivery to continue, they affected organisational efficiency, and at times reduced morale.*

*FSIM observes that staff and volunteer engagement and morale across CFA and FRV has been affected by the reform, particularly through vacancies, secondment arrangements, and interim agreements. These impacts have potential implications for sector level service delivery capability and capacity. For example, CFA’s volunteers reported feeling underutilised and undervalued. CFA acknowledges these issues and is undertaking a range of activities to improve volunteers’ experience to retain its volunteer base...*

*...The establishment of the new complementary service delivery model has clearly impacted service delivery efficiency, organisational resourcing, and staff and volunteer morale. FSIM will return to issues highlighted above in year two to assess their effectiveness and any resulting service delivery impacts more closely.<sup>13</sup>*

And the following excerpts from my 2021–22 annual report:

*FSIM has also noted through its year two engagement that some interim arrangements (for example, land use planning) have significantly impacted staff and/or volunteer morale, created inefficiencies (such as time spent processing applications and undertaking quality assurance) and resulted in poorer performance in the provision of services to the community and industry.<sup>14</sup>*

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<sup>13</sup> FSIM, [Annual Report 2020–21](#), pp. 6–7.

<sup>14</sup> FSIM, [Annual Report 2021–22](#), p. 48.

*...it was unclear to many volunteers who engaged with FSIM, predominantly from co-located brigades, what role they play in the new model. When FSIM asked volunteers to describe the role of a CFA volunteer, one volunteer from a major regional centre described their role as, “bushfire patrol with some BA58 thrown in”, while another said, “we don’t know what we are... [our role] doesn’t make sense”. While FSIM acknowledges that local tools, such as Local Mutual Aid Plans exist, some volunteers communicated to FSIM that they felt underutilised, confused, and unguided, which has impacted volunteer morale and motivation at multiple brigades, particularly those in co-located stations and those in close proximity to FRV response area.*

*Although communication in the lead up to the reform cannot be changed, some CFA volunteers continue to reflect on the consequences of what they believe to be inadequate consultation, including reduced morale, motivation and numbers at some locations.<sup>15</sup>*

This may have since changed. CFA is best placed to provide further details.

- Were the impacts on volunteers adequately anticipated and mitigated by government?

**Response:** Whilst I reported in my 2020–21 annual report that:

*The Victorian Government allocated \$126 million over five years to support CFA capability initiatives. CFA is progressing the delivery of its volunteer support and training programs, the procurement of new appliances, and implementing station upgrades. CFA and FRV have systems in place for training and accreditation in critical skills. There is an opportunity for CFA and FRV to leverage joint training exercises to support sector-wide resilience and capability building.<sup>16</sup>*

I have not assessed whether this adequately anticipated and mitigated the impacts on volunteers. CFA is best placed to provide further details.

- In your view, were volunteer risks ever treated as secondary to industrial or organisational priorities?

**Response:** I have not seen or received any evidence to suggest this is the case.

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<sup>15</sup> FSIM, [Annual Report 2021–22](#), pp. 69–70.

<sup>16</sup> FSIM, [Annual Report 2021–22](#), p. 7.

## Government Accountability and Oversight Limits

5. As Monitor, your role is to provide assurance rather than direct accountability.

- Were there occasions where you identified serious issues but lacked leverage to compel change?
- Were there systemic issues you believe should have triggered ministerial or Cabinet-level intervention?
- In hindsight, were your statutory powers sufficient to meet public expectations of accountability?
- Should a future monitoring role have stronger enforcement or escalation powers?

**Response:** The FSIM was established under the FRV Act to provide the Victorian Government and community with independent assessment of the fire services reform implementation progress.

In line with my legislative remit, I have and continue to observe, assess and report independently. However, compelling and driving change remains the responsibility of DJCS and the fire agencies.

Should the government of the day require the empowerment of this role to compel change, I would assume a reassessment of the function and statutory powers required.

## Lessons for Government

6. Looking back over five years as Fire Services Implementation Monitor, what do you consider the single largest failure of the reform process?

**Response:** The government set a 10-year timeframe on the reform, and we have only just passed the halfway mark of that period.

In my 2024–25 annual report foreword, I reflected on the first half of the reform and explored the systemic challenges I have observed and reported throughout the five-year monitoring period. The key challenges I addressed in length are:

- secondment model
- vacancy and relief issues
- cultural change
- legislative barriers
- industrial relations.<sup>17</sup>

- What would you warn government against repeating in future large-scale emergency service reforms?

**Response:** Please refer to the previous response to question 6.

- Do you believe the reform has ultimately made Victorians safer—and on what evidence?

**Response:** Whilst I understand the intent of fire services reform and the acquittal of actions against the 2 implementation plans is to ultimately make Victorians safer, I have yet to conduct efficacy assessments on whether the acquittal of the implementation plans have achieved the desired outcomes.

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<sup>17</sup> FSIM, [Annual Report 2024–25](#), pp. 7–10.

- Are you sufficiently resourced to undertake your role? Resourcing is a decision for DJCS.
  - Has there been any reductions to your resourcing levels over the past 5 years?

**Response:** As per the FRV Act, the resourcing of my office to enable performance of my legislative obligations is managed by DJCS in accordance with their assessment of my needs.

At establishment, my office had a footprint of 6 roles (1 x director, 2 x managers, 3 x officers). This has diminished overtime, with a proposed footprint of 3 roles from July 2026 (1 x manager, 2 x officers).

In addition, my engagement as the FSIM was also reduced from 0.4 FTE to 0.3 FTE.

- Do the agencies report to you secondment vacancy and non-relief? How often? What do you see?

**Response:** Vacancy data is reported at the CFA/FRV Heads of Agency Steering Committee Meeting (HoA) on which I sit as an observer.

HoA meets on a regular basis with the vacancy data reported consisting of the numbers of Commanders/ACFO vacancies and the corresponding CFA districts with the gaps, however the reporting has not always been consistent.

- Do you think the current secondment arrangements are working? Why not?

**Response:** Please refer to the following excerpts from my 2024–25 annual report:

*A core achievement of FSR was the collaboration between the agencies to understand and dissect the secondment model, as it was defined in the Secondment Agreement. Implementing the model, however, has been a central challenge for all stakeholders. Considerable resources have been expended on working through its implementation, the actions that intersect and underpin the secondment model, and the alternative measures developed to manage issues caused in part by its design.*

*I have been advised repeatedly by the CFA that its resourcing needs have not been met through the secondment model and that significant work is still required before this may happen.<sup>18</sup>*

*The Firefighters Registration Board was established to administer the Firefighters Registration Scheme, which registers officers and employees of FRV who apply to the CFA under the Secondment Agreement. The scheme also sets competencies necessary for the registration of these officers and employees and the process to assess whether applicants satisfy these requirements.<sup>19</sup>*

*In 2024–25 the FRB advised that they received 3 applications for inclusion on the register of which 2 were assessed during the same period. The third application was received in June 2025 and assessed after 30 June 2025.*

*The FRB has also advised of challenges, including that the scheme is mandatory only for lateral entrants seeking to be employed by FRV to be seconded to the CFA (that is, applying directly for a secondment position). And because registration is not mandated for the existing workforce, FRV has initiated minimal internal messaging on the scheme.*

*...we also note this has limitations and only addresses one small aspect of the reform arrangement. Registration of lateral entrants under the scheme does not necessarily mean they meet FRV employment requirements. Also, it is uncertain as to how effectively the scheme can fulfill the CFA's workforce requirements.<sup>20</sup>*

*...The secondment model is critical to the success of FSR, and its implications are likely to be far-reaching in terms of the future sustainability of fire services. We understand both agencies support the ongoing progression of work through BAU and strongly encourage them to continue working together to achieve the shared objectives, noting that FRV's industrial environment will play a key role in how this matter resolves.<sup>21</sup>*

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<sup>18</sup> FSIM, [Annual Report 2024–25](#), p. 8.

<sup>19</sup> FSIM, [Annual Report 2024–25](#), p. 5.

<sup>20</sup> FSIM, [Annual Report 2024–25](#), pp. 39–40.

<sup>21</sup> FSIM, [Annual Report 2024–25](#), p. 48.

**Wendy Lovell**

1. Can you provide the committee vacancy data you have as reported to you by CFA for the Commander, ACFO and Instructor roles over the last 5 years?

**Response:** See my earlier response on HoA reporting of vacancy data.

Since 2024–25, vacancies have been reported at a point in time – being only vacancies at the week of HoA. This meant for the weeks where HoA did not meet, no vacancy numbers were reported.

In the preceding years of 2022–24, vacancy reporting was provided at HoA via a spreadsheet which tracked vacancies on a weekly basis.

Note that structured formal reporting on vacancy numbers was not provided in 2020–22.

Due to the differing reporting format and approaches over the years, CFA are best placed to provide fuller details of the vacancy data reported to HoA.

2. Is the current secondment model that supports the provision of FRV Commanders, ACFO's & Instructors to CFA fit for purpose? Does it meet CFA needs? And is it sustainable in its current form?

**Response:** Please refer to the following excerpts from my 2024–25 annual report:

*A core achievement of FSR was the collaboration between the agencies to understand and dissect the secondment model, as it was defined in the Secondment Agreement. Implementing the model, however, has been a central challenge for all stakeholders. Considerable resources have been expended on working through its implementation, the actions that intersect and underpin the secondment model, and the alternative measures developed to manage issues caused in part by its design.*

*I have been advised repeatedly by the CFA that its resourcing needs have not been met through the secondment model and that significant work is still required before this may happen.*

*The problem of filling vacancies and providing relief, including to cover long service and unplanned leave, at the commander and assistant chief fire officer levels in the CFA remains critical. While factors other than the design of the secondment model have contributed to this issue, particularly in peri-urban areas, the reform has not reduced the impact of workforce shortages on fire agencies.<sup>22</sup>*

*At year 5, we acknowledge the progress the agencies have made to work together to find solutions that could achieve success for the secondment model. The secondment model is critical to the success of FSR, and its implications are likely to be far-reaching in terms of the future sustainability of fire services. We understand both agencies support the ongoing progression of work through BAU and strongly encourage them to continue working together to achieve the shared objectives, noting that FRV's industrial environment will play a key role in how this matter resolves.<sup>23</sup>*

3. Are you aware of concerns and difficulties experienced by CFA when attempting to resolve performance issues or complaints involving FRV employees seconded to CFA?

**Response:** Yes, I am broadly aware and have reported in my 2022–23 annual reported that:

*FSIM considers that the intersection between the Secondment Agreement and the Fire Rescue Victoria Operational Employees Interim Enterprise Agreement 2020 (FRV Operational EA) may hinder the CFA's Chief Officer's (CO, CFA) ability to manage seconded staff. For example, under the FRV Operational EA, secondee performance and conduct management must be referred to and managed by FRV. This provision affects the ability of the CO, CFA to oversee the performance and appointment of seconded staff under their command. Limitations such as this restricted CFA's ability to investigate and address possible performance, occupational health and safety, or disciplinary issues of FRV staff in seconded roles.<sup>24</sup>*

Management of such issues may have progressed since, and CFA are better placed to provide specific details.

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<sup>22</sup> FSIM, [Annual Report 2024–25](#), p. 8.

<sup>23</sup> FSIM, [Annual Report 2024–25](#), p. 48.

<sup>24</sup> FSIM, [Annual Report 2022–23](#), p. 5.

4. We have heard issues around seconded staff not having appropriate communications equipment, and other issues around secondees being asked to comply at all times with both CFA and FRV policies and procedures (even when they maybe in conflict). Is this a safe system of work? Are they best set up to succeed in their roles?

**Response:** I am not the most appropriate person to comment on safe systems of work – the expertise and responsibility lie with the fire agencies. However, I am aware of such issues where secondees are asked to comply at all times with the policies and procedures of both fire agencies.

‘Priority Three: Plan and build for the future’ in the Year 2–5 Implementation Plan contained 12 actions, each with supplementary deliverables, for the agencies to complete. Priority Three actions were developed to operationalise and embed practices and outcomes that would support planning and building for the future of the fire services. I have reported on the associated progress and issues of completing these 12 actions in all 5 of my annual reports.

Please refer to the following excerpts from my 2024–25 annual report:

*Actions 3.9, 3.10, 3.11 and 3.12 were designed to cement the practical arrangements required to operationalise complementary fire services. These actions aimed to enable both the CFA and FRV to deliver effective and efficient services to the community.*

*As we noted earlier, actions 3.7, 3.9, 3.10 and 3.11 are interconnected, with the governance arrangements established under action 3.7 providing oversight of, and underpinning, the joint responsibilities of both agencies in harmonising procedures to support effective operations between the 2 agencies. As well as the deliverables led by the CFA to finalise delegation authorisations and its internal policies and procedures, this includes to support operationalisation of the SLDA and schedules.<sup>25</sup>*

*Action 3.9 was a joint action that required the CFA and FRV to agree on how key services would be delivered to the community through 6 deliverables.*

*Although the agencies acquitted the action, we saw that both acquittal reports indicated some deliverables were not yet complete and would transition to BAU.<sup>26</sup>*

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<sup>25</sup> The schedules that underpinned Service Level Deed of Agreements (SLDA) transitioned to service delivery plans under the agencies’ joint Fire Services Reform Doctrine Framework, FSIM, [Annual Report 2023–24](#), p. 60.

<sup>26</sup> FSIM, [Annual Report 2024–25](#), p. 34.

*As noted in our 2023–24 annual report, the CFA and FRV developed a Fire Services Reform Doctrine Framework (FSRDF) to support the operationalisation of the agreements being developed under action 3.9. The HoA endorsed the FSRDF during the previous reporting period, which enabled the schedules that underpinned SLDAs to be transitioned to service delivery plans (SDPs).*

*This action deliverable required the CFA and FRV to communicate the FSRDF in its respective agencies. As noted in FSIM's year 4 report, the CFA did this in April 2024 and we have seen evidence that FRV also communicated the framework to staff involved in developing the SDPs. We understand a joint communication between FRV and the CFA is being prepared to share the framework with the workforces of both agencies.<sup>27</sup>*

5. I note in your own reports you identify constraints that the consult and agree provisions within FRV's Enterprise Agreement are having on reform. Can reform achieve its stated objectives if these constraints remain?

**Response:** As per my 2024–25 annual report, I noted the 'consult and agree' requirement was a key impediment to completing actions under the implementation plan, but despite ongoing challenges, there has been some improvements.<sup>28</sup>

Notwithstanding, I have yet to conduct any efficacy assessments on the degrees of success of these impacted implementation actions.

6. I note CFA have developed a capability statement to inform FRV of the capabilities they require from the seconded workforce (as per implementation plan) – are those targets being met?

**Response:** I have not yet conducted any efficacy assessments on whether CFA's development of a capability statement, delivered as part of action 5.1 under the Year 2–5 Implementation Plan, has addressed seconded workforce targets.

As noted in my 2024–25 annual report,<sup>29</sup> there continues to be further work required.

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<sup>27</sup> FSIM, [Annual Report 2024–25](#), p. 63.

<sup>28</sup> FSIM, [Annual Report 2024–25](#), p. 10.

<sup>29</sup> FSIM, [Annual Report 2024–25](#), pp. 73–74.

7. Is the co-location policy that sees CFA volunteer brigades and FRV crews operating from the same fire station working? What challenges exist?

**Response:** In my 2023–24 annual report, I noted that in early 2022, I encountered an issue regarding the lack of afterhours access to the front door of a co-located fire station due to an ongoing disagreement on the station schedule. I also noted that 2 years later in 2024, the issue was still not resolved.<sup>30</sup>

At the conclusion of the Year 2–5 Implementation Plan, I reported in my 2024–25 annual report that the sub-schedule for that particular co-located station was still progressing.<sup>31</sup>

Whilst overall, most of the persistent issues with co-location were addressed, largely through the transfer of property, assets, liabilities, rights and obligations from CFA to FRV (action 3.3), development of tenancy agreements and identification of required capital works across co-located stations to facilitate implementation reform objectives (action 3.4), and the preparation and agreement of station sub-schedules for co-located brigades (action 3.12), there continues to be challenges that need to be progressed jointly by both fire agencies under business-as-usual arrangements.

8. Are you aware of examples where the closest fire stations to an emergency call are bypassed so that FRV crews support other FRV crews and not relying upon CFA? If so, how is this a complimentary fire service model?

**Response:** Since establishment, the FSIM has received communications regarding alleged incidents of CFA appliances being bypassed in favour of FRV appliances. I am currently investigating the issue of nearest and most appropriate response, with particular regard to the agency-agreed definition and underpinning principles of a complementary fire service.

It is anticipated this work will contribute towards optimising safe outcomes for the community, who are potentially at risk as fires may not be managed as efficiently and effectively as possible.

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<sup>30</sup> FSIM, [Annual Report 2022–23](#), p. 64.

<sup>31</sup> FSIM, [Annual Report 2024–25](#), p. 36.

9. I note you are also responsible for reviewing the effectiveness of Fire Services Reform. What other matters are you / will you be looking into?

**Response:** Beyond efficacy assessments, I will look in the following matters as per the following excerpt from my 2024–25 annual report:

*Although this is my last annual report against the Year 2–5 Implementation Plan, the legislated role of the FSIM will remain for another 5 years and will continue to conduct the functions below:*

- *monitor and assess ongoing efforts to improve the interaction between the CFA and FRV and other agencies*
- *provide independent and impartial monitoring of unresolved FSR issues*
- *remain available to meet with career firefighters and volunteers to listen to their concerns and experiences that are a result of FSR*
- *monitor all the implementation plan actions that have been moved to business as usual, especially the partially completed actions from the Year 2–5 Implementation Plan*
- *consult and engage with agencies in the performance of the FSIM’s functions*
- *prepare quarterly and annual reports on the findings of the FSIM on performing its functions.*<sup>32</sup>

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<sup>32</sup> FSIM, [Annual Report 2024–25](#), p. 11.