



## District 14 District Planning Committee



Ref: Fire Services Bill D14 DPC

7<sup>th</sup> July 2017

Keir Delaney  
Assistant Clerk Committees  
Department of the Legislative Council  
Fire Services Bill Select Committee  
Parliament House, Spring Street  
EAST MELBOURNE VIC 3002

Dear Keir,

### **Re: Inquiry into the Firefighters' Presumptive Rights Compensation and Fire Services Legislation Amendment (Reform) Bill 2017**

We write on behalf of the District 14 District Planning Committee (DPC), which exists to contribute to strategic planning and achievements of the Country Fire Authority (CFA) values, objectives and priorities via positive, open and honest discussion regarding matters that affect the CFA, Brigades and the communities within District 14. Members of the District Planning Committee act on behalf of Brigades and Groups that are empowered to endorse District Policies, in accordance with CFA Corporate Policies, Act and Regulations.

Located in the North West Metropolitan area of Melbourne, encompassing the Municipalities of the City of Wyndham, City of Melton, Nillumbik Shire, City of Whittlesea and Hume City Council, District 14 is experiencing substantial growth in both population and industry which is evidenced by the Melbourne Urban Growth Boundary, of which District 14 incorporates four of the five growth corridors.

District 14 has 30 solely Volunteer Brigades, 9 Integrated Brigades and 4 Groups; including 2 Headquarters Brigades and 1 Coast Guard Flotilla. The District is supported by 2,500 Volunteers, 235 Operational Staff, 4 Brigade Administration Support Officers (BASOs) and 7 District Support Staff. The District Headquarters office is also host to approximately 24 Regional and Headquarters Staff.

District 14 is bordered by the Metropolitan Fire District, encompasses Tullamarine Airport, Ravenhall Prison precinct, a number of critical metropolitan infrastructure assets and sensitive locations. District 14 members regularly work with personnel from Metropolitan Fire Brigade (MFB), Aviation Rescue and Fire Fighting (ARFF) (Airservices Australia), Department of Justice and the Victorian Planning Authority (VPA) in addition to other emergency management organisations to provide an integrated response to fire and other emergencies in Victoria.

These relationships, together with the geographical location, substantial growth, changing demographic and risk profiles and significant experience with the management of 9 Integrated Brigades places District 14 in a unique position to conduct a thorough, detailed, technical and comprehensive assessment and submission to the Fire Services Bill Select Committee which would provide the Committee with valuable insight into the Reform and any proposed models for the implementation of the amendment.



The District 14 DPC met recently to discuss and prepare a submission for the Fire Services Legislation Amendment. The discussions centred around firstly, what is the best outcome for the community, secondly what is the best method of delivering fire services, in a preventative and suppression sense and finally, what is/would be the best human resource model to deliver the required services. However, due to the extremely short timeframe set by the committee terms of reference with regards to the receipt of submissions, we have been unable to conduct the required collaborative process of consultation with the various stakeholders, be that with either volunteers or staff. The DPC is also unable to adequately review the draft Legislation due to the absence of any intended processes, models or structures on how the revised service delivery amendments might be managed and implemented.

The DPC therefore strongly and unambiguously requests that the members of the Fire Services Bill Select Committee provide more time so as to allow a detailed analysis of the Draft Legislation, the potential impacts to community outcomes, the potential benefits to the various stakeholders together with any changes to the response capability and responsibilities of our Members. In essence, we urged the committee to extend the period of receipt of submissions for no less than an 8 week period. This timeframe will allow the correct level of consultation and engagement with volunteers and staff. In particular, it will ensure compliance by the committee, on behalf of the Legislative Council, of section 6G (c) of the Country Fire Authority Act 1958, which requires that “the Government of Victoria and the Authority commit to consulting with Volunteer Fire Brigades Victoria Incorporated on behalf of volunteer officers and members on any matter that might reasonably be expected to affect them”. It should be stressed that there has been no consultation, to date, on a meaningful level with all Brigades and Groups by the ‘Authority’.

An example of some areas that the DPC believes require further clarity or information prior to a rigorous analysis are as follows:

- The proposed process for service delivery, particularly in the areas where current Volunteer members and career staff operate from an Integrated Fire Station/proposed Fire Rescue Victoria response area;
- Service delivery performance of existing model covering the metropolitan fire district;
- The process for recruitment, selection and secondment of Fire Rescue Victoria employees to CFA locations;
- The Industrial process for Seconded FRV employees who are hosted by the CFA, particularly surrounding discipline, performance and grievance processes;
- The provision of proposed Business Plans for both the proposed Fire Rescue Victoria service together with the revised Country Fire Authority;
- Clarification of the Volunteer Brigades’ ongoing responsibility in the proposed Fire Rescue Victoria response areas;
- Provision of a proposed process for separation of Brigade assets between CFA and FRV in the proposed Fire Rescue Victoria locations;
- Clarification of the rights of Instructors, staff Vegetation Management Officers & Practical Area (Drill) Operators under the Firefighters’ Presumptive Rights Compensation;
- Clarification of the Fire District Review Panel process in relation to change in fire risk, whether this will consider performance and response capability or will be limited to risk profile alone, together with greater detail on the benchmark of risk and what the parameters will be; and
- Provision of a proposed process for declaration of Fire Danger Period within Country Area of Victoria that contains FRV locations

The DPC believes it is incredibly difficult for sound analysis to occur on each of the Terms of Reference with the absence of detail of the proposed models. A short statement is contained



below to provide information on the matters that require further investigation prior to a satisfactory assessment being possible:

**a. Impact on fire service delivery across Victoria**

There will indisputably be an impact upon fire service delivery across Victoria. While the DPC does not doubt that the intention is for this to be a positive impact, it is impossible to substantiate this outcome with the lack of detail and time provided to date.

**b. Effect on volunteer engagement and participation in fire service delivery**

There will understandably be an impact upon volunteer engagement and participation in fire service delivery under the proposed reform. The safety of our communities is paramount and the DPC will not allow a solely Volunteer Brigade to provide a reduced standard of service if this service would be far greater under a fully staffed model. The DPC is however unable to make any assessment of the scale of impact without the provision of a proposed model for the new Fire Rescue Victoria response areas and the support that the Volunteer Brigades will be expected to provide before being able to understand the impact upon the retention of volunteers, the impacts upon culture, sense of purpose, inclusion and trust within communities.

**c. Short term and long term cost impact on fire service provision**

District 14 has a great deal of experience in the financial implications of running a fire station staffed by paid firefighters. The budgetary requirements vary from location to location depending on a number of factors and the DPC would be able to offer critical insight into both the short and long term cost impacts to the Committee, however the lack of information in relation to the proposed model means that any assessment would be based upon a number of assumptions which would be variable and therefore unreliable.

**d. Underlying policy rationale**

The DPC's understanding of much of the rationale surrounding the reform is attributed to the recommendations of eight separate reviews of Victoria's fire services sector since 2009.

The DPC has no knowledge of any review that has suggested the removal of career firefighters from the CFA and the elimination of the integrated brigade model of service delivery. Two of these reviews specifically recommended supporting and strengthening the current integrated model and the Draft Legislation lacks clarity of the anticipated benefit to community resilience, sustainability and enhancement of volunteerism which the integrated model promotes.

Another foundation of the reform is the belief that the fire services arrangements have remained unchanged for in excess of 60 years. Within District 14, the changing demographic has been successfully managed via the decisions to provide ongoing service to the community to support volunteers with career firefighters at 9 brigade locations in the past 15 years. The changes to the service delivery model during these periods of transitions has demonstrated flexibility and adaptability of the current arrangements and the detail surrounding the proposed advantages to the communities that these Brigades serve is lacking and requires greater analysis.

There is little detail surrounding the reasoning for fixing the Fire Service Levy for two years with the next state government having to deal with funding arrangements or increase in levy.

A number of items within the draft Legislation require further detail or clarification before the rationale can be understood and examined.



The DPC appreciates that the Committee will receive a range of views from key stakeholders, with many supporting the reform while others will provide opposing points of view. There is no doubt that the views of individuals and external organisations will present a great variety of perceived issues and suggested solutions.

It is the opinion of the DPC that it is not possible to truly assess the Draft Legislation and provide comment on the ToR in the absence of the necessary detail behind the implementation of this reform. The DPC believes it is essential that any decisions surrounding the future of the organisation be adequately supported with clear information to allow an educated and soundly based judgement and the rationale for these decisions to be transparent and available to all stakeholders. Only this, together with the additional time to properly consult and engage our members, will provide the evidence base to suitably respond to the ToR for the benefit of the Committee.

The DPC welcomes the opportunity to expand on the matters raised in this submission and to comment upon any other issues the Committee may identify during the investigative stage of the inquiry process.

Yours sincerely,

A large black rectangular redaction box covering the signature and name of the sender.

Graeme Bisby  
Chairperson  
District 14 Planning Committee