

The Fire Brigades Union



**An FBU response to the
FireControl National
Business Cases**



**SAFER
FIREFIGHTERS
SAFER
COMMUNITIES**

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INTRODUCTION

The Fire Brigades Union welcomes the opportunity to comment on the National Business Case for FireControl, published in November 2008. We have also published a further Independent and Objective Review commissioned by the union from the Institute of Public Finance which also forms part of our submission.

Our response is hampered by the absence of a Government reply to the comments made about the regional business cases which pre-dated the national business case.

More delays are now confirmed and there are more costs associated with those delays, all paid by the taxpayer. The annual cost of renting the largely empty and under-used RCC buildings will soon be hitting £13.2 million.

Delays mean more for the management consultants who have now clocked up their takings to over £40 million. In the context of a massive budget squeeze on fire authorities, and the lack of Government funding for major flooding response, these are a shocking waste of money.

I. OVERVIEW

From the outset of the FireControl Project our view has been that Government exaggerated savings and underestimated the true costs of the Project. It over simplified the technical challenges and underestimated the timescale needed to implement those proposals.

No one doubts that something which resembles an emergency fire control may emerge at the end of the process, whenever that might be. But it will not be the far better system promised, nor will it be a cheaper system.

Government has already sneaked through changes which will allow standard 999 telecoms operators to filter and queue calls to the fire service at very busy periods. After spending in excess of £1.4 billion on a new regional control system the public could get the message "The fire service is busy at the moment... please call back later". Source at Appendix 1.

If a great new system was coming on stream that would not be necessary. We do not accept such a response is a better or a more modern way of doing things.

The overall FireControl Project costs – confirmed by the Institute of Public Finance – are in excess of £1.4 billion and rising, far above earlier estimates. The total rental costs of the new RCC buildings are in the region of £400 million, with Government paying rental costs until cutover and FRAs being charged by the LACCs for these costs.

The costs of the buildings are the biggest single running cost apart from staffing costs. While the property deal – a Property Developer Scheme – meets the need for affordability, it does not represent best value for money.

£268 million has been spent or is ear-marked for additional staff and other project costs between now and 2011. This includes £56 million and rising for consultants alone over the length of the project (over £40 million has already been spent on project consultants).

The cost of FireControl technology is just over £210 million for the first 8 years. There are no "savings", real or imagined, which can be offset against these costs. The staffing costs are all in addition to these figures, they cannot be deducted from these costs.

This spending is at a time of a tremendous squeeze on FRA budgets. And Government refuses to provide the money to help the fire service respond safely and effectively to major flooding incidents.

The spending on FireControl is out of all proportion to overall fire service budgets and has been an enormous diversion of time, effort and resources which could have been better spent.

There is no evidence FireControl will deliver measureable benefits to either the public or firefighters. Scotland and Wales will get most of the additional functionality through

the FireLink Project, and without the need for FireControl.

We believe that Fire and Rescue Authorities are being asked to sign-up to a project which was ill-thought out and poorly costed since its initiation. It remains so.

II. DELAYS

A further 9 month delay has been announced because, Parliament has been told, of major problems which have recently emerged with the technology. This safely places the start date – cutover in the jargon – the other side of the next General Election.

But it also places the finish dates very close to the 2012 summer Olympics. Even then, as fire minister Sadiq Khan makes very clear in the answer below, the new dates are little more than provisional and are subject to further change. There remains great uncertainty.

Dismore – Regional control centres

Thu, 11 December 2008 | House of Commons – Written Answer

Contents

Mr. Dismore: To ask the Secretary of State for Communities and Local Government (1) on what date each fire and rescue authority is expected to cut over to its regional control centre, broken down by (a) brigade and (b) region; [241300]

(2) what contingency plans she has put in place for fire and rescue services to respond to the potential terrorist threat to the 2012 Olympic Games, in the event that not all fire and rescue authorities cut over to regional control centres by 2012. [241302]

Mr. Khan: On 26 November 2008 I announced a rescheduling of the FiReControl cut over timetable. We have shared an indicative timetable with the Fire and Rescue Services and are validating the revised dates with them directly. The draft timetable, broken down by region and Fire and Rescue Service, is:

Provisional revised FRS cutover timetable for FiReControl (November 2008)

FRS (by Region) Provisional revised date (1)

South West Region

Somerset	July 2010
Devon	July 2010
Dorset	October 2010
Avon	November 2010
Cornwall	June 2011
Wiltshire	August 2011
Gloucestershire	October 2011

East Midlands Region

Derbyshire	July 2010
Leicestershire	October 2010
Nottinghamshire	November 2010
Lincolnshire	February 2011
Northamptonshire	February 2011

North East Region

Tyne and Wear	July 2010
Durham and Darlington	October 2010
Cleveland	November 2010
Northumberland	November 2010

West Midlands Region

Staffordshire	October 2010
West Midlands FRS	November 2010
Shropshire	February 2011
Warwickshire	June 2011
Hereford and Worcester	June 2011

South East Region

Hampshire	February 2011
West Sussex	June 2010
Royal Berkshire	August 2011
Oxfordshire	October 2011
Kent	October 2011
East Sussex	December 2011
Buckinghamshire	December 2011
Isle of Wight	February 2012
Surrey	February 2012

North West Region

Greater Manchester	February 2011
Merseyside	June 2011
Cumbria	August 2011
Cheshire	August 2011
Lancashire	August 2011

Yorkshire and Humberside Region

West Yorkshire	August 2011
South Yorkshire	October 2011
North Yorkshire	December 2011
Humberside	February 2012

East of England Region

Cambridgeshire	October 2011
Essex	December 2011
Bedfordshire	December 2011
Suffolk	December 2011
Norfolk	February 2012
Hertfordshire	February 2012

London

London	February 2011
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(1) As with any project of this nature, we will only have certainty about the timing of these later stages of the project once earlier stages have been completed successfully. We will be communicating progress on this directly with our stakeholders.

As a consequence of this rescheduling the London cutover moves forward relative to other regions with the entire network due to be in place by February 2012, under current planning assumptions. We will continue to work closely with the London Fire and Emergency Planning Authority to review preparations.

The Home Office is leading work with other Government Departments, the Police and emergency services to develop the Safety and Security plan for the 2012 Games. CLG is working closely with the Fire and Rescue Service and other stakeholders on planning and coordination requirements as part of this process.

Bringing the date of the London cutover forward only makes a little sense and makes it appear new regional controls will be in place just in time for the Olympics. This is an illusion.

Some of the events (obvious targets for terrorists) will be held outside of London and many of the Olympic teams will be based outside of London. Many of those visiting the Olympics will have accommodation outside of London.

In any event, the other RCCs are currently the only back up London, the host control for the Olympics, will have. Either the national network is running and capable of supporting London, or it is not.

Fire services have made clear to the FBU they would want any national network of regional controls fully operational at least a year before the 2012 Olympics to ensure that the glitches and issues which will inevitably arise, can be dealt with properly. The new dates given for final cutover are not 'just in time'; in reality they are already too late.

Further delays also open up the possibility that cutover in the brigades outside of London may not be complete by the time of the 2012 Olympics. This would leave a situation, outside of London, where some brigades have cutover over to RCCs and some have not.

On 16 December Essex fire authority wrote to CLG outlining some of its concerns which included the impact of the Olympics. The chief officer set out the formal position of the authority about a move during Olympic year: "The Authority will not consider transferring to a regional control centre during 2012".

The delays up to now have meant squeezing the project timetable between the general election and the summer 2012 Olympics. There is a genuine risk of, if the Government presses ahead, there being a mad dash to complete the project to hit the Olympic timetable.

The result of which could be the system being forced into "go live" before it is properly ready. This is not the only problem posed by the current set of delays.

The current set of delays and the union does not expect the timetable outlined above to hold, does impact on costs. One key project risk identified in the Outline Business Case published in November 2004 was of completing the buildings more than 6 months before the RCC was to become operational.

Such a delay would have a catastrophic effect on project 'savings' as leases would be paid for underused or unused buildings. Despite this being flagged as a major risk with high impact, the risk was not avoided.

The details of the monthly costs were set out in a Parliamentary Answer on Wednesday 10 December:

Mr. Dismore: To ask the Secretary of State for Communities and Local Government what the cost of leasing and maintaining each regional fire control centre (a) has been since it becoming operational and (b) was in the latest month for which figures are available. [241298]

Mr. Khan: The running costs for the eight regional control centres (RCCs) which have completed their commissioning process – 'practical completion' – are shown for October, broken down by region, in the following table:

Region	Running costs (£)
NE	143,994
EM	145,889
SW	140,839
WM	113,463
SE	46,142
NW	36,920
Y and H	48,558
EoE	84,617

These eight buildings are in the process of being fitted out, including installing the IT hardware, AV screens and furniture. Note, the range reflects the relative stages of completion. Therefore, no regional control centre is yet operational.

The monthly costs are running at between £750,000 and will rise to £1.2 million with London's costs in addition. But delays have another impact.

By the original timetables, RCCs were all meant to be operational from November 2006 and November 2007. Fire services worked to the original timetable and were not upgrading their emergency fire control rooms and radio systems unless those upgrades were already underway.

Those which were in the process of upgrading and have completed this often say their systems are better than that which will be available in regional controls. But many fire authorities did not proceed with upgrading and have had to keep controls and radio systems going beyond the date of their intended replacement.

Several fire authorities have told us that these further delays will put even more pressure on their current systems, particularly the radio system. The further delays pose a clear risk to those fire authorities which followed the original Government timetable for RCCs which is now many years behind schedule.

III. BACKGROUND

In April 2000 Government commissioned consultants, Mott MacDonald, produced The Future of Fire Service Control Rooms and Communications in England and Wales. This recommended a reduction from 49 controls to 21, but rejected regionalisation.

The second Mott MacDonald report, The Future of Fire & Rescue Service Control Rooms in England and Wales 2003, recommended 8 new regional controls in England, and one new control to serve London. These RCC regions precisely mimicked the Government's model for regional Government in England.

FireControl was meant to follow on the back of the planned creation of regional Government in England. FireControl is about centralising at worse (and it has a purely national function) and regionalising at best.

FireControl remains, in the Government's own words, the creation of a national network of regional controls. It is not any version of new localism nor is it a measure empowering local communities, quite the opposite.

FireControl was and is an attempt to re-fashion an old idea and smuggle it through under cover of improving national resilience, while asserting it will make substantial savings. Government makes frequent use of the threat of terrorism, industrial risks and climate change to justify regional controls while over-seeing a reduction in the number of firefighters capable of responding to such threats.

If there is such a desperate need for the fire service to have regional controls to deal with major terrorist incidents, the same must follow for the other emergency services which have to respond to the same incidents.

We know of no similar plans involving the other emergency services.

IV. DIVERSION OF SCARCE RESOURCES

The risks being taken – operational and financial – are not justified by the “rewards”, real or imagined. Runaway costs and even more delays have meant money has been diverted away from frontline services, including some of our current controls, to fund FireControl.

The diversion of scarce financial resources – either from the general taxpayer and business or council taxpayers – can only result in a further threat to frontline operational capability. This threatens to damage the service’s ability to respond to incidents, reducing overall “resilience”.

Beyond the very short term, there remains the twin threat of council tax being pushed up and frontline operational capability being cut to fund the extra costs of RCCs. The funding squeeze on all other areas of the fire service, while feeding more cash to the already plump sacred cow of FireControl, suggests this is already happening.

The Fire Brigades Union commissioned the Institute of Public Finance to conduct an independent and objective review of the CLG FireControl Full Business Case (FBC), second draft, October 2006. This IPF report was published on 5 December 2006 and is available on our website.

The IPF report, now over 2 years old, questioned whether FireControl would result in overall savings. It warned that “if savings are adversely affected” then “the validity of the business case and how it meets its key objectives (including affordability and value for money) could be called into question.” It also warned that any changes to savings and costs could have a “significant” knock-on effect on that part of the Council Tax raised by fire authorities.

The report said: “The business case still needs more clarity on what the effect of the project and its outcomes will be on the 46 Fire and Rescue Services, particularly the impact of savings and costs and how these will be apportioned and allocated. This could have a significant knock-on effect on the levels of precept on Council Tax for Fire & Rescue Authorities.”

The other options previously disregarded need to be “revisited” in the light of, for example, a terror threat which has changed since the plan was originally put forward in 2003. Other options such as the tri-service pilots option; using existing control rooms; nor merging existing controls had been properly considered.

The report said there was no justification given as to why there should be only one control centre in each English region. It says “...neither business case fully addresses why there has been a selection of 9 regional control centres... Since resilience is now a major factor to be considered, a relatively small number like 9 controls may also present a risk in the face of co-ordinated terror attacks or the potential for systems failure. The rationale for the choice of 9 control centres needs to be better justified and explained in the business case.”

Some specific claims central to estimate the overall cost of the project, the report said, “are questionable and are not backed up with any clear evidence.” These include the wide-ranging assertion in the draft FBC that “forecast savings are based on very prudent assumptions. There is scope to do better”.

The report went on “it is not clear whether the FBC has addressed the potential additional resourcing issues for the FRS concerning ‘out of scope’ activities or identified the detail of these activities...”. Out of scope work will still need to be done by fire authorities but not included in the costs of the project.

The report questioned whether staff numbers had been estimated against the work the regional controls will carry out. “...what evidence was used to produce the estimated numbers of control room operators required?” and if these estimates were based on the amount of work the regional controls would have to carry out.

Most of these critical issues have still not been properly and fully addressed two years after the IPF raised them in their report. The FBU commissioned a further independent and objective review from the IPF, published in September 2007, into the FireControl Full Business Case v.1.0.

This IPF review highlighted what were now clearly rising costs and clear reductions in estimated savings. IPF also highlighted that the new business case made clear the FBU’s alternative proposals were rejected because, CLG claimed, the union could not prove savings would be produced by our alternatives.

The IPF report into the Regional Business Cases, which formed part of our response to those, raised a number of critical issues and questions. It is available on our website.

V. REGIONAL BUSINESS CASES

All figures below in (£1000s)

Current control room costs*		Forecast RCC running costs	Cost/saving	Resilience payments
East England	7,439	7,373	66	0
East Midlands	5,390	6,262	-872	872
North East	4,803	5,405	-602	602
North West	8,828	8,426	403	0
South West	7,056	6,992	64	0
West Midlands	6,746	7,457	-710	710
Yorks & Humberside	5,952	7,124	-1,172	1,172
South East	10,232	8,767	1,466	0
London	8,837	10,898	-2,061	2,061
Total	65,284	68,703	-3,419	5,417

Notes to table:

i. All figures in Financial Year 2006-07 prices ii. Resilience payments subject to periodic review

SOURCE: CLG, regional business cases.

What is now clear, even on these figures, is that RCCs will be at least £3,419,000 more expensive to run nationally, than current operations. To meet the 'affordability' test – which would not otherwise be passed – CLG has invented 'resilience payments'.

But not all of the running costs of RCCs are included in the table. The additional and significant costs of FireLink – the new radio system on which RCCs will depend – are excluded.

According to those fire authorities which have shared their costs estimates with the FBU, the running costs of FireLink are estimated to be at least 6 and up to 10 times the cost of running the current radio network. Add the total costs of FireLink and the table above will look much worse.

There is no detail published which indicates the cost to each individual fire authority. There is no detail of which fire authorities are the losers – or alleged gainers – in this process.

There is no detail as to how and if savings made by one fire authority, if there are any can be re-distributed to another fire authority which loses out financially.

Several regions face significant 'losses'. While Government can make promises about short-term funding to make up some of the shortfall, it cannot and does not do so beyond 2011.

There will be many who share our scepticism about those regions where 'savings' are claimed and over which period

the savings refer. The only way to make savings is to cut the number of staff even further.

As we detail later in this response, cutting staff will result in a collapse in call-handling capability. Standard telecoms 999 operators have already been asked if they will filter and queue calls to the fire service during busy periods.

To increase RCC call handling capability would mean higher RCC running costs, further undermining the credibility that any savings will be made. Critically, the figures given are only the annual running costs; they exclude the huge set up costs which will be carried by the Project meaning there will be significant costs over all.

We are not convinced these RCC forecast figures are a direct like-for-like comparison with current control costs. In addition to the extra costs of the new radio network to be used by regional controls, the forecast figures certainly do not reflect the quantity of 'out of scope' work which will either have to be paid for by setting up other arrangements or re-charged to fire authorities by the RCCs themselves.

There is, we understand some more information given to fire authorities about 'out of scope' costs but it is clear out of scope work has not been properly quantified. Private estimates shared with the FBU by a number of fire authorities suggest their estimates range from at least 4 up to 12 full time staff to, with the larger Met authorities almost certainly needing more.

CLG has come up with an estimate of half an administrative post.



As part of their normal operations, the RCCs would also make considerable real-time demands for data from RCCs and this work has not been fully quantified or costed. If the data is not always accurate and reliable, it will quickly undermine confidence in the system.

In advance of cutover there is the enormous challenge presented by the transfer of safety critical information, regarding premises for example, from fire and rescue services to RCCs. This amounts to around 3 year's work for each brigade, and for some of the larger brigades, considerably more time than that.

This process, known as Data Capture Management and Transfer (DCMT), has still not been properly quantified or costed. This will determine the quantity and quality of information contained on the RCC databases, not only before cutover but at all times afterwards.

These costs will be on-going and significant. As they have not been properly quantified and costed they cannot be fully accounted for even in those Project costs which have been made available up to now.



VI. BROKEN PROMISES ON FIRECONTROL SAVINGS

Government now seeks to play down the central role the alleged massive savings have played from the very beginnings of the Project. This includes the claim that the Project would pay for itself within five years.

The original Mott MacDonald options analysis, according to the June 2007 Full Business Case report: "...resulted in a clear preference for the vertical integration option because: Firstly, it was the only option that would demonstrate a positive Net Present Value (NPV) (£43m over a 10 year period from Project start). This means that the option was forecast to be cash generative, during the period under consideration, after taking into account appropriate discount factors. Secondly, the forecast savings would be considerable compared to the Do-minimum option (£115m at 2003 prices). Thirdly, it would support more of the business requirements presented than other options."

Massive savings have been underlined time and time again to the union, to MPs, to fire authorities and to councillors. There can be no doubt of the central role played by the alleged massive savings in selling the Project to opinion-formers and stakeholders.

In a letter to the Fire Brigades Union dated 10 December 2004, Nick Raynsford, then a minister at ODPM, enclosing a Fact Sheet on RCCs – sent to all MPs and Chairs of FRAs stated: **"....There is however, a strong business case for regional controls, showing that there are significant efficiency savings to be made.** The figures... show that **RCCs will achieve, on average, a saving of some 30% over existing arrangements. In the case of smaller fire and rescue services with lower call volumes, savings will be significantly higher than this. These savings will enable us to invest more money in front line fire prevention."**

In a letter from Marie Winckler, a senior ODPM Civil Servant dated 19 January 2005 to Chairs of Regional Management Boards about financial concerns in relation to FireControl she stated: "I understand members' main concern relate to the fact that you do not yet have hard information on the costs of FireControl in order to plan your budgets, and the recently circulated outline business case does not provide this. From members' perspective, the financial case is the one in which you have the strongest interest... **The outline business case argues that it will in fact cost you considerably less and that there will be savings which could be recycled into such things as community fire safety."**

In a letter from Nick Raynsford dated 21 January 2005 to Peter Stybelski, Chief Executive, Cumbria County Council after Cumbria's motion to oppose RCCs, and copied to 6 local MPs Mr Raynsford wrote: **"Regional control centres are expected to achieve, on average, a saving of some 30% over existing arrangements once the transition to the new control centres is complete."**

In a letter from Nick Raynsford dated 6 April 2005 replying to concerns raised by David Crausby MP on behalf of constituent Tony Garthwaite he wrote: "We expect that there will be net savings of 30% in the running costs of control services from financial year 2009 – 10 onwards..."

Taking costs of the project as a whole, we expect it to have paid for itself within five years of the last regional control centre going live, and to have saved over £40m (at today's prices) after a further five years. [FBU emphasis]

In a letter from Richard How, Project Director Fire Control, dated 4 December 2006 to FBU General Secretary Matt Wrack, Mr How rejected the union's alternative plan for resilience controls, partly on grounds of lack of savings: **"The FiReControl project is expected to achieve considerable efficiency savings for fire and rescue services.** RESCONs would be unlikely to deliver this. Staff is the major component of spending for control centres. No staff savings would be made under the FBU solution and some extra staff may be needed in the 'Resilience Controls' to deal with the co-ordination function."

In a letter from Parmjit Dhanda, MP Parliamentary Under Secretary of State CLG dated 6 November 2007 to Matt Wrack General Secretary FBU, Mr Dhanda wrote: **"The current estimate in the FBC [Full Business Case] is that FRAs [Fire and Rescue Authorities] will make efficiency savings of around £115m in the six years from FY 2012-13 until FY 2017-18 and they are expected to continue to make savings directly as a result of FireControl for two more years before they replace the systems."**

If all FireControl Project costs including all 'out of scope' costs are counted – they will not reveal any overall savings far less to have paid for itself within five years. The central plank of the business case has therefore disappeared which is why the Government wants to re-focus on claims about resilience.

VII. RESILIENCE

The FBU sees no evidence that FireControl will improve the overall resilience of the fire service, nor the fire service's ability to respond to all the local emergencies it has to deal with. The threat of terrorism is not new, although the nature and the type of actual and anticipated attacks is new, as is the level of planned response.

The fire service, using brigade emergency fire controls, has dealt with the aftermath of major terrorist attacks for many, many years including the biggest ever loss of life – Lockerbie – and the biggest bomb ever used on mainland Britain – Manchester – and assisting in rescues from bomb damaged structures – Brighton. The service dealt with the 7/7 bombings and further attempts at mass atrocities and the threat of them.

The service has also dealt with a range of major challenges caused by extreme weather conditions for at least 40 years. These include high winds, flooding or unseasonal cold weather. The key issue arising from the 2007 floods was the lack of safety critical equipment including rescue boats, a lack of training and a lack of frontline personnel.

The Pitt Review, despite being offered the opportunity to endorse regional fire controls, did not do so. As one would expect, the Department's own Chief Fire and Rescue Advisor, Sir Ken Knight, did endorse regional controls, although he would hardly do otherwise.

For those who dealt with the aftermath of Piper Alpha or Haverford, Buncefield was not the first major oil fire the service had to deal with. Industrial risks such as those demonstrated by the Buncefield fire are not new and have always seen, where necessary, the deployment of personnel and equipment from across the UK.

This cross-border mobilising – which includes crossing Wales, England and Scotland 'borders', not simply across English brigade or RCC borders – has gone on for many years. Appliances will continue to cross 'borders' even with the Wales and Scotland rejection of FireControl, because cross border working does not need regional controls to happen.

Environmental challenges have included a fire service response since at least the Torrey Canyon oil tanker spill in the 1960s.

The creation of a system which slashes the number of fire controls and has no back-up system if the common national network fails, actually creates a far less resilient system than we have at present. RCCs build in more weakness, not greater strength.

Even the very best IT systems are capable of such failures. And while individual hardware and software components may be tried and tested in isolation from each other there is no guarantee they will all work perfectly when they are networked.

This is not a trifling matter nor a theoretical debating point. It is already accepted by Government that the latest set of delays are because of significant technical problems, on technology they had claimed was already tried and tested (it wasn't).

VIII. RESILIENCE – CALL-HANDLING CAPABILITY

As we pointed out in our evidence to the Pitt Review, regional controls would have a much reduced call-handling capability than existing emergency fire controls. The root of the problem is the Government's commitment to "prove" RCCs can be run more cheaply because they will have fewer staff.

A much-reduced call-handling capability will result in the entire network hitting "spate" capacity much faster than the current arrangements. This on its own, destroys claims of greater resilience with RCCs.

The pitifully low call-handling capability of regional controls was verified in a parliamentary answer on 2 February 2007. This answer underlines the direct link between the number of staff and the ability to handle calls.

Angela E. Smith: ...The capacity of each RCC depends on the number of staff and the shift pattern at any given time. Based on the current indicative staffing numbers and shift patterns, the call handling capacity of each RCC is shown in the following table:

Hourly Call capacity of regional control centres:

	08:00 -16:00	16:00 -20:00	20:00 -23:00	23:00 -08:00
London	240	300	210	150
South East	150	195	150	105
South West	135	165	135	105
East England	135	165	135	105
East Mids	135	165	135	105
West Mids	150	195	165	120
York/Humber	150	195	165	120
North East	120	150	135	105
North West	225	285	195	135
Network	1,440	1,815	1,425	1,050

Only one RCC outside London will be capable of handling more than 200 calls an hour for an entire region and will only have that capacity from 8am to 8pm.

At 6am on a Sunday – when Buncefield happened – the call handling capacity of the entire national RCC network is just over 1,050 calls an hour. The East of England RCC is identified in the table as having an hourly call-handling capacity of just 135 for the entire region at the time of Buncefield.

At 08.50 – at the time of the London bombings on 7/7 – the entire national RCC network has a capacity of only 1,440 calls an hour. The London RCC has a call handling capacity identified as only 240 calls an hour at that time.

Significantly fewer staff to answer calls than at present simply cannot result in more calls being answered. While some RCC regions say they will use slightly more staff than that indicated by CLG, the numbers stated are nowhere near current levels.

At some times of the day – including times which would have coincided with Buncefield, 7/7 – RCCs would have less than 60 staff in regional controls for the whole of England. At times, there would be fewer people to answer calls in RCCs for the whole of England than there are at present in some regions.

It is a recipe which produces the alleged "savings" on staffing costs set out in previous business cases, but also one which threatens to see the national network of RCCs rapidly hit meltdown because of lack of staff to handle calls.

The CLG claim there will be more staff to handle calls is ludicrous. There will only be a third of the staff currently employed, it does not add up.

IX. RESILIENCE – AIRWAVE/FIRELINK CAPABILITY

FireLink provides the RCCs with the new radio system which, if it works well and as planned, will provide almost all of the benefits the Government claims are the benefits of the FireControl Project. The RCCs are dependant upon the new radio system and any slippage in the FireLink timetable impacts upon the FireControl project.

FireLink on its own represents enormous technical and financial challenges for the fire service. The running costs of the new radio system will be very much higher than the current system's costs.

However, other concerns were raised in relation to the police Airwave radio by the Home Affairs Select Committee, 7th report, published on 30th October 2008. The concerns expressed in the report concern the physical capacity (voice and data) of the Airwave system as experienced by the police.

These concerns are before the fire service has started using Airwave itself for voice transmission, with additional and considerable data transmission using the Mobile Data Terminals. All who gave evidence to the Home Affairs Select Committee appear to share some level of concern about system capacity, particularly when there is a higher than usual concentration of users.

Such a concentration of users would be exactly the scenario at large incidents with the addition of the fire service and ambulance service also using their Airwave capacity.

The relevant parts of the report are:

"POTENTIAL PROBLEMS WITH THE AIRWAVE RADIO NETWORK

285. Despite the benefits that Airwave has brought, as set out in chapter four, the Police Federation expressed concern about the ability of the network to cope with large-scale events such as the forthcoming Olympics:

Serious consideration also needs to be given to the Airwave radio communications problems that already exist and will only be exacerbated by an event of this size and nature. As experienced during last year's [2007] Notting Hill Carnival, the Airwave network cannot cope with a high concentration of officers using the system in one place. There also remains the huge problem of communications for the emergency services working on the Underground system. This was brought to light during the tragedy at King's Cross in 1987 and 20 years later has yet to be satisfactorily solved. Whilst Airwave can now be used on some Underground lines, the roll-out remains piecemeal and has taken too long. [323]

286. 92% of delegates at the Police Federation annual conference in May 2008 voted that the system is "inadequate", the then-Vice Chair, Alan Gordon, saying it

"would struggle to cope with a well-attended egg and spoon race, let alone with the 2012 Olympics". [324]

287. The Academy of Engineering explained the cause of the problem:

The amount of voice traffic is now reaching the limits of the current system's spectrum resources in some areas (particularly in London). This suggests that the Airwave system will be inadequate for the future needs of the police forces, particularly in densely populated areas where information needs are likely to exceed the TETRA network's capacity.

Airwave has limited (narrow) bandwidth and data capability. Existing equipment is capable of carrying more traffic but additional spectrum is required. Rather than use another band it would be easier and less expensive to expand the band assigned to Airwave to the full range. In the UK, military users occupy the part of the band not assigned to Airwave, so this expansion would need to be managed carefully. [325]

288. Mr Bobbett, of Airwave Solutions Ltd, told us that although the Airwave system has over 99% geographical coverage, a physical restriction would be expected. The system is now, owing in large part to implementation across the Metropolitan Police, carrying three or four times the amount of communications previously carried. [326]

289. Mr Bobbett noted that Airwave Solutions was working with the Olympic Delivery Authority and the London Organising Committee of the Olympic Games, as well as the Metropolitan Police and the Home Office lead for the Olympics, to overcome the problem: "I think every technology has some limits, but we are talking about many thousands of officers. If I take G8 as a real-life example, I think we had 3,000 officers in and around the Gleneagles event itself, and the system worked very well". [327]

290. We also put our concerns to the Minister of State, who replied:

The reality is much closer to what Airwave was suggesting than the Police Federation, but I know, in the City, in the next breath, that there have been teething problems and issues ... There are difficulties, not least around surges of activity, which we do need to try and understand more readily ... I know that people—certainly the Met—are fully on the case in terms of ensuring the durability of the Airwave network for the Olympics. [328]

291. On a related point, we raised the possibility of another terrorist attack on the transport network and how Airwave would cope with this. Mr Bobbett responded:

The Airwave system is completely joined up between the surface and the tunnel, and as we sit here today

X. RESILIENCE – RCC BACK UP

and I refer to the underground stations, obviously the stations that are above ground on the London Underground system have coverage already, but those that are under ground, about 75% actually now have the system deployed into the stations and tunnels. [329]

292. Chief Constable Johnston agreed with this analysis, but noted his anxiety that the station programme is dictated according to engineering rather than operational priorities, which means that "some of the more important places are not getting covered as quickly as we might like". [330]

293. Insufficient progress has been made in bringing forward a plan to secure the London Olympic Games, which are now only four years away. We are concerned at the potential implications both for security during the event and for planning by individual forces who will be involved in delivery. The Home Office should take urgent steps to ensure that planning security for the Games is properly co-ordinated across police forces and other authorities.

294. The Airwave radio network can struggle to cope where a very large number of users are concentrated in the same area. We are concerned about the potential for the network to fail during the Olympic 2012 games, given the numbers of officers who will be deployed. The Home Office should address this as a matter of urgency, including consideration of expanding the radio band assigned to Airwave. We expect the Home Office to keep us informed as to practical steps they are taking in partnership with Airwave Solutions."

The FBU has raised these issues directly with CLG.

Much is made of the alleged benefits of automatic back up from other regional controls. This would happen if one regional control is either unable to respond to calls or is swamped by the volume of calls – what are called 'spate' conditions.

One central question raised by the experience of the 2007 floods, is not what happens if one regional control hits spate conditions, but what happens when several regional controls – if not all of them – hit spate conditions.

Based on the call-handling capacity of regional controls created by reduced staffing, there is a clear danger the entire system will be over-whelmed by calls. That is not a more resilient system, but a far less resilient system which would hit maximum call-handling capacity much, much faster than the present arrangements.

There is also no clear answer as to how each region – or brigade – can control its own appliances in the event of a major incident. Calls which trip over to another RCC could mean too many appliances were mobilised to a major incident. It could also mean that trip over calls to other RCCs could see appliances needed to support a major incident had in fact already been mobilised to other incidents.

In a real-life situation, major incidents rarely present themselves initially as such. Lockerbie was first reported as a garage fire, 7/7 as a power surge on the tube, the terrorist attack on Glasgow airport as a car fire and the attempted bombing in London's Haymarket at around the same time as smoke emitting from a car. They do not neatly present themselves as major incidents.

The only option with RCCs would be to try and set up some sort of area cordon on their systems to try and ensure a discreet area remains under local control. But this undermines the alleged benefit of other RCCs being able to mobilise in any brigade or region operating at spate conditions.

It also highlights the inability of local brigades to directly mobilise their own resources (the system only allows local brigades view-only access to what RCCs are doing). They cannot directly mobilise even if the national network fails.

XI. "THE FIRE SERVICE IS BUSY RIGHT NOW, PLEASE CALL LATER"

The latest business case claims that RCCs will be so good at call handling that they will be able to handle large numbers of calls during super-busy periods, which it calls 'super-spate'. This does not tally with the Government sneaking in changes to the guidance for the Public Emergency Communications System (PECS).

This is operated by the standard telecoms operators you get through to in the first instance when you dial 999 and they ask whether you want fire police or ambulance.

Standard 999 telephone operators will be used to filter and queue emergency calls to the fire service. For the first time ever callers asking for the fire service at busy times will face a series of questions which could result in them being told "the fire service is busy... please call back".

The unpublicised move comes only months before the first Regional Control Centres were meant to start going live. Regional control start dates have now been delayed a further 9 months.

The Fire Brigades Union was alerted by a letter sent to fire controls by Cable and Wireless in late October 2008 regarding changes to the Public Emergency Communications System (PECS) which receives all 999 calls before putting them through to fire, police, ambulance or coastguard. The letter sets out a new and unpublicised change to the PECS guidelines agreed at an Emergency Authority (EA) meeting in May 2008.

While only explicitly referring to incidents for extreme weather, for which the fire service still has no statutory duty, it sets out how 999 telecoms operators will filter 999 calls intended for the fire service. The phrase to be finally used with some callers who do not get their answers 'correct' is **"The Fire Service is very busy with flood related incidents. If the situation becomes worse, please call back."**

There has been no public announcement and no mention in any of the FireControl Business cases, although the change was agreed as far back as May 2008, before the regional business cases and this business case were published. The national FireControl Sounding Board, on which the FBU sits, was told in December 2008 that this was the only way the RCCs could work during busy periods.

This simply cannot be accepted as a better way of handling 999 calls to the fire service and destroys the Government claims the new system will be much better. It undermines the entire resilience rationale of the RCC Project.

XII. RISKS

All projects have specific risks. Currently there are 130 project risks on the FireControl Risk Register. Eight of these are rated 'high' or above.

These are not minor or simple risks, they go to the heart of delivering the project and include: Local/regional resource capacity/capability, strategic change/impacts, technical integration with other projects, contractor performance and user acceptance.

The Government's appalling track record on major technology/change projects does not suggest that it can put in place a system that is demonstrably and measurably better than the current emergency fire control arrangements. In our view the move to get 999 telecoms operators to filter and queue calls into the RCCs system demonstrates that.

In addition, as the original Outline Business Case (OBC) from November 2004 stated: "There is no precedent for a regional structure to deliver an operational function such as this." (page 79, paragraph 110). The risks outlined in the OBC are project specific and significant while "existing arrangements for delivering core services (including call-taking and dispatch functions) is perceived to be excellent." (OBC Page 11, paragraph 30).

The OBC assessed the risk of "delay or even total project failure" as "**high**" with a "**very high**" impact if it does fail. The risk was assessed so high, not simply because the project is unique, but because "the recent history of delivering IT/change projects in the public sector has demonstrated a less than 50% success rate." (OBC page 52 paragraph 141).

There is a high risk/high impact "that the current provisional timescales may not be achieved" which would "increase project cost". (OBC, November 2004, page 52, paragraph 142). There is a high risk/high impact that Council Tax may be pushed up as a result of cost overruns.

The OBC report went on: "Failure to deliver economies would reduce the resources available to further service aims and objectives, and might impact on Council Tax" (OBC, November 2004, page 52 paragraph 142).

Despite central Government claiming it would take actions to mitigate against these risks, the delays and budget busting has taken place. While Government can fill in the extra costs in the very short term, it has made no promises beyond that.

Destroying the existing system – described as "excellent" (Outline Business Case, p11, paragraph 30) remains a huge gamble with large amounts of public money. FireControl would add little additional measurable benefit in terms of lives saved even if the system worked perfectly. Any significant failure would result in a severe risk to public and firefighter safety.

In addition to these risks are those posed to the main suppliers by the current turmoil in money markets. Money to lend is in such short supply that even some of the best and biggest global businesses are being squeezed by a lack of lines of credit from their usual sources.

FireControl, which will be delivered by a wide-range of global private sector suppliers is not immune to what is happening to the world's financial system and the impact that is happening on the world economy. Those risks should also be factored in as project risks.

XIII. OUT OF SCOPE

There has never been a proper understanding of the wide-ranging scope of the work currently undertaken in emergency fire control rooms. FireControl only offers a stripped down model of the work currently undertaken to call-taking, dispatch and incident monitoring roles.

This flawed model was used to justify cutting staffing numbers to levels which could manufacture the "savings" needed to underpin claims that the introduction of regional fire controls would produce huge savings.

The result is an as yet unquantified amount of work which is "out of scope" and off the books of FireControl. It is still unclear what mixture of incident-related work and core fire & rescue service related work is included beyond the basics outlined by Mott MacDonald.

A number of Fire and Rescue Authorities also have Service Level Agreements or contractual arrangements in place for work such as handling out of hour's calls for other local authority providers such as Social Services Departments. These have been made on a best value procurement basis demonstrating flexibility while producing significant revenue streams for Fire and Rescue Authorities.

The result is that there remains no accurate cost comparison between the current emergency fire control costs – which include out of scope work – against future RCC work which excludes the out of scope work.

But this "out of scope" work will still have to be carried out and paid for. Even if RCCs can take on some of the "out of scope" work the costs will still have to be re-charged to fire authorities.

There is no evidence the cost comparisons made in the regional business cases or the national business case are accurate comparisons, because the cost of current controls include work that will not be undertaken in regional controls.

Technology which can work at brigade level cannot be assumed to be "tried and tested" at a regional level, never mind as part of a national network of control centres, and there are no obvious 'models' to follow.

XIV. TECHNOLOGY – OVERVIEW

Much is made of the benefits of the technology Regional Control Centres will have available. In fact much of this technology is actually provided largely or exclusively through the separately funded FireLink Project.

Many fire authorities and chief officers have, quite naturally, been stung by what they feel is implicit criticism from Government about technology or functionality they do not currently have.

Essex Chief Fire Officer David Johnson told his local newspaper, the Essex Chronicle, the Government's presentation of the technology in the regional business case was "disingenuous". Mr Johnson is quoted as saying: "We have a very effective control room that mobilises resources quickly and effectively to emergencies when we receive calls. I am a little bit disappointed – I would say the report is disingenuous.... To turn around and say we need to have (centralised) fire control because we do not have these things is not portraying the full picture."

We would not disagree with those comments and many other chief officers have made clear to us they support those views. Existing emergency fire controls comply with guidelines set out in GD92 (outlined in 1992 and evaluated a success in Specifications of a Communications Infrastructure for Fire Service Mobilising Systems GD-92/1003A/2.2, Home Office Fire Research and Development Group 1/96 and Evaluation of GD92 Framework Summary Report, CFBAC Research Report Number 73, 1997). GD92 sets down standards of, for example, resilience and fall-back against which emergency controls are measured.

GD92 does not specify that all control systems are identical, but rather the key requirements with which existing controls must comply. The Regional Business Cases have produced a set of new and up to now unknown "standards" out of the project hat to point out which authorities don't have what functionality or technology.

Neither CLG, nor any of its predecessor departments, has sought to change or amend the GD92 guidelines to set different criteria. All existing controls comply with the actual technical requirements and standards of resilience and fallback currently in place.

It is, in our view, entirely wrong for the Department to point the finger of accusation – for that is what it is – that some emergency fire controls don't have particular types of equipment or software which they have never required them to have.

This is doubly so, because many Fire and Rescue Authorities put their own fire control plans on hold for the last 6 years because of the FireControl and FireLink Projects.

XV. TECHNOLOGY – WHAT DOES WHAT?

Many of the benefits claimed for the FireControl project are supplied solely or largely by the FireLink Project. This includes the re-establishment of a limited degree of interoperability with police and ambulance radio systems.

This interoperability does not exist at present because of Government decisions to allow all three emergency services to press ahead with switching to digital radio systems to different timetables. It is not an issue caused by any of the three emergency services, but one created solely by Government.

Mobile Data Terminals (MDTs) are being paid for and installed under the FireLink Project, with FireControl developing and providing the software. It will be extremely challenging for MDTs to live up to the expectations raised by the Department.

It will be particularly challenging to transfer all data to appliances at live operations or data transfer to appliances when they are mobile and on their way to incidents.

These data terminals will rely on having all the information they contain put together through the Data Capture Management and Transfer (DCMT) process before cutover to RCCs. The use of MDTs will also rely in future on all that information being validated and updated on a 24/7 basis or there is a clear risk the information they contain will be out of date.

Mobile Data Terminals (MDTs) are already in place in a number of fire authorities although they typically work alongside full use of voice-based radio communications. This will not be the case in future as RCCs will be relying primarily on data transfer with far less use of voice-based radio.

Several fire authorities have discontinued trials of Mobile Data Terminals, in some cases several years ago. Scotland and Wales will get the same mobile technology (and it has its limitations) without regional controls.

Automatic Caller Location (ACL), or EISEC, has been widely available in most controls for some time. ACL is still only useful with BT and Cable and Wireless systems and has not kept pace with the rapidly diversifying telephone service provider market.

Calls cannot be traced on Voice Over Internet Protocol (VOIP) calls which are an increasingly used and cheaper alternative to traditional telephone landlines.

With mobile phones, ACL typically gives a generalised radius of location. It does not help at all if the call is from a passenger in a moving car reporting an incident.

ACL gives little help unless you are in the building which is on fire and using a BT or Cable and Wireless system. It is only used for validation purposes, and in almost no

circumstances as the primary source of information.

In RCCs good call handling – the skill to elicit critical information from people who may be in panic – will still be the primary source of collecting information from callers.

Firefighters on the way to an incident will not rely on Satellite Navigation (SatNav) as the primary source of information. It is a secondary source of information.

Satellite Navigation (SatNav) is already known to be counter-productive in some instances. For example, appliances may need to be sent to different access points to a large incident to avoid appliance bottlenecks or for other operational reasons.

Automatic Vehicle Location (AVL) is useful as a secondary source of information in identifying which appliance may be closest to the incident in terms of time. Both SatNav and AVL are no use during flooding or other adverse weather conditions where roads can be suddenly unusable, closed or blocked, such as during the recent snow and cold snap.

In those instances the fire control is reliant on the local knowledge and experience of emergency control staff. 'Local knowledge' is not only a detailed knowledge of the geography, topology and population of a brigade area, but also knowledge of the brigade, its operational procedures and its personnel.

XVI. MORE THAN 2 YEARS AFTER THE SELECT COMMITTEE REPORTED

In June 2006 the House of Commons Select Committee for the Office of the Deputy Prime Minister (as it then was) examined the FireControl Project and came up with a number of questions and observations. More than two years on and they remain largely unanswered despite repeated promises by Government to do so.

These include:

"We are unconvinced that the Government can offer the assurance of maintained or improved service quality resulting from the FireControl project and there is clearly widespread doubt across the FRS. If it can, we recommend it does so, and provides the evidence, immediately." (Paragraph 28)

FBU comment: The Government has supplied assertions and claims. It has provided no evidence, but has dropped the claim that fire appliances will get to incidents faster.

"We are disappointed that the Government is unable to provide fuller details of duties that have been defined as out of scope. Removing some operations from control rooms should clearly result in savings in control room costs, but it is not clear where these operations will be transferred to, or how the costs of the transfer and future operations will be met. There is no evidence to suggest any overall saving. As a result we, like many within the FRS, do not have full confidence in the Government's claim that FireControl will achieve enhanced efficiency. We recommend that the Government complete its analysis of control room functions immediately and certainly before making further progress with the FireControl project." (Select Committee Paragraph 33)

FBU comment: Despite repeated promises to do so, we have seen little detailed information about what work is considered "out of scope" of the Project but will still have to be paid for by Fire Authorities.

"We agree that it is difficult for FRAs to have certainty regarding the financial implications of the move to Regional Control Centres without a full business case which includes information on what costs will be borne by whom over what timescale." (Select Committee Paragraph 39)

FBU comment: No full and final business case containing all costs – including out of scope costs – has been produced. For some time they have been 'work in progress'.

"The fact that the FRS has not been given enough information about the detail, particularly the financial detail, of FireControl, is at the heart of the opposition to the project. The absence of information means that fire authorities and representative bodies cannot give unqualified support as they are unconvinced that the aims of enhanced resilience and efficiency will be achieved. There are considerable risks associated with the project,

identified in our evidence and in the ODPM's own business case. We consider the greatest of these to be the opposition to the project from the FRS itself. For FireControl to have any hope of success, the Government should obtain greater support from the FRS. This can only be achieved through provision of greater information on both the project specifics and long-term plans for the structure of the FRS." (Select Committee, Paragraph 50)

FBU comment: these issues have not been satisfactorily addressed.

22/10/08

To Whom It May Concern:

Following on from the EA Liaison Meeting held on the 13th May 2008, a new section was added to the PECS code of practice guidelines concerning periods of extreme weather (see section 12).

We at Cable & Wireless, felt it was important to contact all Fire Brigades to highlight the processes we will now be following, should any future periods of extreme weather occur.

The extreme weather process is below:

- ❖ Fire contact C&W via callback phone to advise of the impact they are expecting/experiencing and give revised call connection instructions
- ❖ If time to answer is exceeding 3 minutes, C&W will contact the affected Fire Brigade for advice or to advise we will be implementing the neighbouring county procedure
- ❖ In the case of flooding, once instructed by a particular Fire Brigade, 999 operators will begin to question callers so as to filter calls, to allow normal Fire service call to be answered.
First Question: "Are you reporting a flood?"
 If not a flooding incident, the call should be connected as normal. If the call is flood related the 999 operator will ask a second question:
"Is anyone in danger?"
 If the answer is yes, or doubt exists, or the caller insists on being connected, the call will be connected as normal.
 If the answer is no, the caller will be told:
"XXXX Fire Service is very busy with flood related incidents. If the situation becomes worse, please call back."

Please note that following a verbal instruction to begin using this process, we will require written confirmation from the Duty Officer before implementation can begin.

To ensure we have the correct contact numbers for your Brigade can you please confirm the following?

Primary 999 connect to number

Secondary 999 connect to number

Alternate 999 connect to number

Evacuation number

Critical contact number

Buddy Force (please specify if there is a different buddy force in place during periods of flooding)

Cable & Wireless contact details are as follows:

Primary callback number	0121 623 6263
Secondary callback number	0121 623 6264
Tertiary callback number	0121 623 6265




Cable&Wireless

Fax numbers
(Glasgow)

0121 623 6200 (Birmingham)/0141 303 2791

I would be grateful if you could send your response back either by e-mail or post.

E-Mail address: - EA.Admin@cw.com

Postal Address: - EA Liaison Team
Cable & Wireless
5th Floor
Atrium Court
50 Waterloo Street
Glasgow
G2 6HQ

Yours sincerely,

Lynn Carroll
EA Liaison
Tel No. 0141 303 2714



Fire Brigades Union

Bradley House
68 Coombe Road
Kingston upon Thames
Surrey KT2 7AE

Tel: 020 8541 1765

Fax: 020 8546 5187

www.fbu.org.uk

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