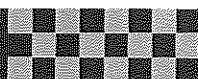


Staff Submission

Response to A SAFER Community: Discussion Paper

CFS Staff

24/10/2014



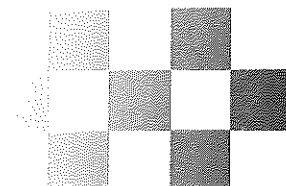
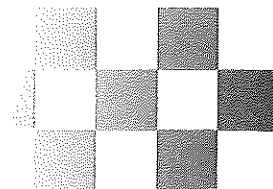


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Executive summary

The Minister for Emergency Services, the Hon. Tony Piccolo, is reforming South Australia's fire and emergency services sector. The drivers of this reform are to deliver increased effectiveness and efficiency across the three key agencies – Country Fire Service, Metropolitan Fire Service and State Emergency Service – to achieve improved community safety outcomes.

The core strategy for achieving this is integration of the three services (and also Volunteer Marine Rescue) into one organisation under the direction of one Chief Officer reporting directly to the Minister.

Comparable initiatives were introduced in 1999 and again in 2005 in South Australia, both resulting in an overarching strategic body striving to integrate the three emergency services. These models, known as ESAU and SAFECOM respectively, are widely considered as unsuccessful.

This is the third time the government has sought to achieve efficiencies in the emergency services sector. This time, the proposed reforms are wider and include a true amalgamation of the three agencies into one government organisation with strong delineation between operational and non-operational roles, and the centralisation of those functions identified as non-operational.

The Country Fire Service (CFS) makes no such demarcation between roles. Our organisation is characterised by a close integration of what we call frontline and frontline support services. Our focus on prevention and preparedness – based on inquest recommendations, national standards and international best practice – shapes the way we operate and dictates that we are more than a simple model of 'firefighters' and 'admin staff'.

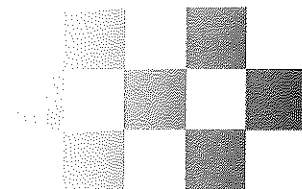
More so, our volunteer culture - we have 13,500 volunteers throughout regional South Australia – defines us. CFS staff work closely with our volunteers and expend a great deal of time (typically beyond our 'day' jobs and out of hours) to engage, support and enthuse volunteers. For every 100 volunteers, there is one staff member. Accordingly, our roles are intrinsically linked.

Putting aside our inherent expertise and experience, CFS runs on goodwill, passion and community spirit. Accordingly a drive for efficiency which risks removing those cultural touchstones, built up over generations, needs to be carefully considered and implemented.

We agree there is some room for greater efficiency among agencies within the fire and emergency services sector and we agree those efficiencies should be investigated.

We are concerned that the Discussion Paper, which this submission addresses, contains a number of assumptions and statements that are not evidence-based. We are worried that while there has been considerable consultation to date, objective analysis of the sector, and the individual agencies within it, has not occurred. We are disappointed that the central issue – a lack of appropriate resources – is being overshadowed by a drive for structural reform.

Minister, you have our full cooperation in introducing reform that will help each individual agency to improve, individually and together, and to keep our community safe. In return, we ask that you ensure you are fully informed throughout this process. We would welcome further opportunities to share our knowledge with you to ensure this reform is the one that works for the sector and the community.



Our process

Following the release of the *A SAFER Community Discussion Paper* for comment on 16 September 2014, CFS implemented a structured engagement program to collect and collate staff sentiment and comments for this submission.

Our Executive Team appointed a Staff Reference Group, guided by a Governing Body, to develop the whole-of-staff submission. Staff were encouraged to submit individual responses and pledge support for a collective staff response.

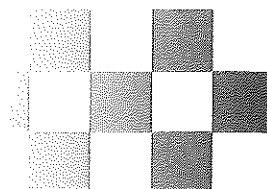
Our guiding principles were:

- **Inclusivity:** inclusive of all paid staff
- **Organisation-First:** focus on what's best for the organisation, not the individual
- **Public-Safety Mandate:** avoid 'protecting our patch' and focus on the ultimate goal of a safer community
- **Staff Empowerment:** no executive influence or input – this submission was to be truly representative of staff sentiment
- **Solution-Focussed:** wherever possible, focus on solutions not problems
- **Educate Others:** aim to inform where information or assumptions presented in the Discussion Paper were different from our knowledge or experience
- **Linked:** to use the guiding principles presented in the Discussion Paper as a consistent 'reality check'.

Volunteers were not included as the CFS Volunteers Association (CFSVA) is submitting a separate response.

We sought assistance from an interstate communication, community engagement and change agency to coordinate the program and this submission. We did this for two key reasons:

- CFS did not have appropriate resources to dedicate to the submission, given the very short timeframe for feedback, particularly just prior to fire season; and
- we wanted an external third-party without bias to guide us through the process, challenge us in our thinking and assist us in developing a collective response.



Our program

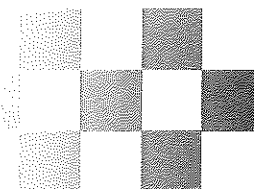
Date	Phase
16 September	Minister launches the "A SAFER Community: Discussion Paper" for comment
25 September	Staff Workshop – to discuss proposed sector reform
26 September	Governing Body appointed <i>The role of this committee is to oversee the process of a whole-of-staff submission from CFS. To avoid any conflicts of interest and to ensure the submission represents a collective staff view, the Governing Body decides to appoint an external consultant to conduct the staff engagement process.</i>
2 October	Expression of Interest for Staff Reference Group <i>The role of this committee is to act as a sounding board/advisory committee on behalf of staff</i>
8 October	Staff Briefing Paper and first Staff Survey distributed
8 October	Staff Reference Group appointed
10 October	First Staff Survey closes
14 October	Second Staff Survey opens <i>This survey comprises results of First Staff Survey and revised Proposed Sector Model from Minister for comment</i>
16 October	Second Staff Survey closes
17 October	Staff Workshop <i>The purpose of the workshop is to expand on information discovered in staff surveys and determine what should be included in our submission</i>
24 October	Submission finalised
24 October	Submission sent to the Chief for information

Our commitment

CFS staff are passionate about the work we do. We are strongly committed to our organisation, our volunteer colleagues and the many communities we serve together.

We recognise the South Australian government's obligation to its constituents to ensure public funds are spent wisely. We also champion any initiative if they will make our community safer.

We agree with some of the issues outlined and statements made in the Discussion Paper. We agree there is room for improvement in our organisation and across the sector. We agree the centralisation of some shared corporate service makes sense and an overarching unified structure has the potential to bring equity and improved efficiency to the overall sector.

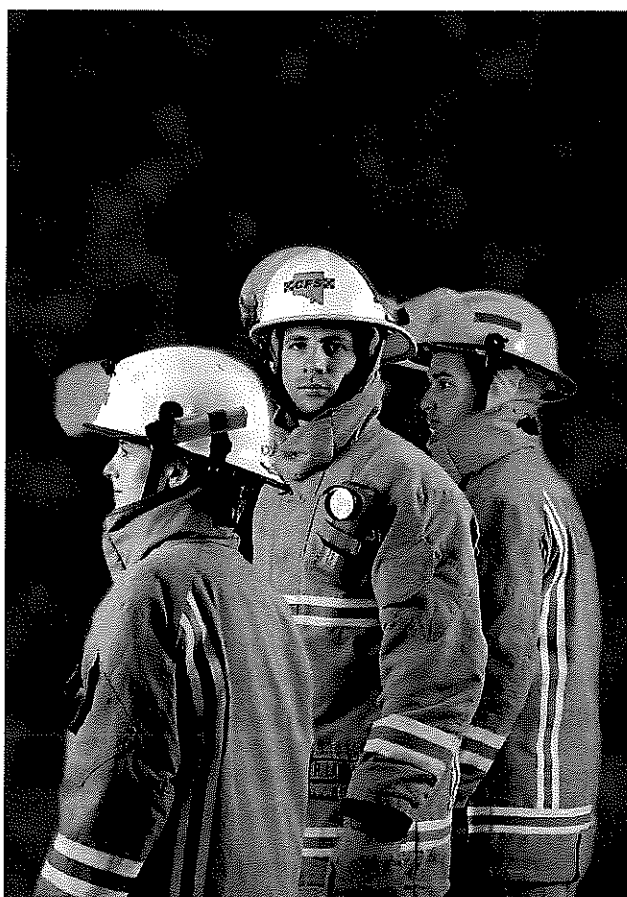


We are not convinced that the solutions to the issues outlined in the Discussion Paper lie in the proposed structure circulated to date and indeed believe these possible reforms may ultimately lead to increased costs and reduced community safety. We're concerned the focus has been on structure rather than resourcing, consequently resulting in savings rather than safety.

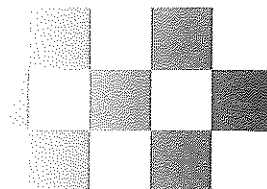
We recognise that there is an appetite for change and that the South Australian Government has been striving for many years to find a model that increases efficiency and integration within the emergency services sector.

To this end, our focus in this submission has been three-fold:

1. To provide additional suggestions or solutions in areas we agree could benefit from reform
2. To provide additional information or clarification in areas where we believe the situation has been misunderstood
3. To seek clarification on matters that are inconsistent with our experience.



Many CFS staff are also volunteers

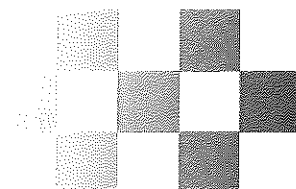


Our response

Our response is presented in four key areas:

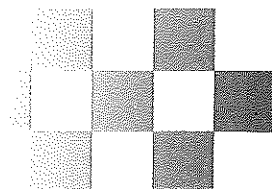
1. Our comments on the key statements made in the Discussion Paper
2. Our feedback on the possible Sector Model and Regional Operations
3. Detailed discussion of 10 priority areas, identified during our staff workshop, with key recommendations:
 - Agility/history of adaption to change
 - Business excellence
 - Culture
 - Volunteers
 - Staff
 - Community engagement and resilience
 - Training
 - Resources
 - Lessons learned
 - Change management
4. A summary of our staff survey findings.

We believe this approach gives a strong representation of our position on the reform to date.

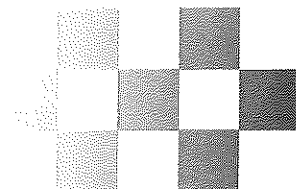


1. Comments on key statements in the Discussion Paper

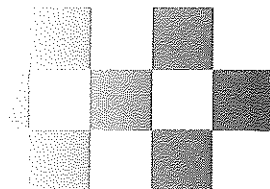
Key statements provided in the A SAFER Community Discussion Paper	CFS staff response
Governance	
<i>Clear leadership that ensures equitable risk based resourcing needs to be in place</i>	We support the need for strong leadership and equitable resource allocation
<i>Duplication of resources occurs and current legislation reinforces a silo mentality, with each ESO receiving direct funding and allocating resources accordingly</i>	<p>There is some duplication of resources and functions.</p> <p>While each ESO operates independently, we actively cooperate, particularly on operational matters.</p> <p>We would welcome a consistent, equitable approach to resource allocation.</p>
<i>Concerns about inconsistencies in resourcing standards and therefore service standards have been raised</i>	We support the introduction of a level playing field in resource allocation. CFS uses the Standards of Fire and Emergency Cover, which is a framework developed to provide efficient allocation of resources to CFS brigades including allocation of membership numbers, training, equipment and vehicles, based on the level of risk for each brigade. This process could be adapted across all ESOs.
<i>There is no single point of control for the sector ... and there are opportunities to improve coordination and cooperation across agencies</i>	<p>We agree.</p> <p>The unification of the three services must not be at the cost of the strengths each service has in its current state.</p>
Volunteers	
<i>It is essential that the 'voice of the volunteer' is heard at the highest level</i>	We agree; they are the backbone of the sector. Please keep in mind that many paid staff are also CFS volunteers and that staff also volunteer their time, above and beyond our functional roles.
<i>There are clear indicators that there is a greater administrative workload being placed on volunteers and that existing consultative and grievance resolution processes could be improved</i>	We agree. This is partly due to the reduction in service from SAFECOM.
<i>Volunteers have expressed concern about a lack of access for employment opportunities within the sector</i>	We agree and welcome opportunities for volunteers to secure paid employment. If this is to be in firefighter roles with the MFS, there will need to be substantial cultural and operational alignment.
<i>Widespread concerns about a lack of recognition of emergency service volunteers</i>	We agree.



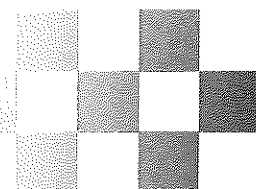
Key statements provided in the A SAFER Community Discussion Paper	CFS staff response
Staff	
<i>There are diverse and incompatible industrial relations provisions and human resources principles and practices across the sector</i>	We agree and we support the alignment and application of consistent employment conditions. This is considered the biggest single issue that needs to be addressed if sector reform is going to be successful.
<i>It is apparent that SAFECOM staff resources have been reduced to such an extent that it has led to ESOs introducing their own corporate resources ... in areas such as asset management, HR and IT</i>	We agree. In many cases, CFS has taken on these additional responsibilities without extra resources.
Operations	
<i>There are very different approaches to incident management particularly with respect to appointment of individuals to command and control functions.</i>	We agree. CFS uses the Australasian Inter-Service Incident Management System (AIIIMS) (the nationally recognised system of incident management for fire and emergency service agencies), a functional management model, where individuals are appointed based on relevant experience and expertise. MFS typically follows a rank structure.
<i>...many non-operational staff also perform specialist incident management roles and are deployed from their day to day jobs to support incident management teams and incident control centres during major events ... it does lead to significant business disruption during times of heightened operational activity</i>	<p>While CFS staff's participation in incident management does take us away from our 'day jobs', we recognise that as an emergency service organisation the core business we are in is keeping the community safe.</p> <p>Further, it is not an easy task, nor a recommended one, to try to dissect our jobs between operational and non-operational; it is a continuum which, if not understood and recognised in the reform process can lead to substantial risk.</p> <p>There is certainly a level of disruption and it can be difficult for stakeholders and other government agencies to understand this. However, this disruption would be minimised through additional resourcing.</p>
<i>Day to day operational arrangements at the brigade / station / unit level are hampered by arbitrary operational boundaries</i>	This has not been a significant issue since the introduction of SACAD, which ensures the nearest most appropriate resource is responded.
<i>There is substantial duplication of effort within command and management structures as well as regional inconsistencies.</i>	We are keen to better understand what the duplication comprises and whether it is borne from organisational silos or operational requirements.



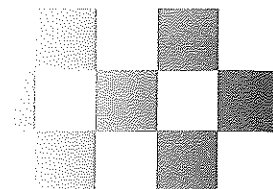
Key statements provided in the A SAFER Community Discussion Paper	CFS staff response
<i>[there are a lack of] KPIs by which [the ESOs] are measured</i>	We agree there is a lack of consistent KPIs against which all ESOs are measured. CFS works to State Plan Target T20 (Bushfire preparedness: Increase the number of households in high bushfire prone areas that are prepared for a bushfire by 30% by 2020) which CFS reports annually against, although we are the only agency with this type of KPI.
<i>A perception amongst some that reform to operational response plans is due to a desire of ESO staff and volunteers to protect 'agency roles' or 'patches' rather than provide the most appropriate emergency response.</i>	There may be some scenarios where 'patch protection' occurs. Our focus on a daily basis, and in this response, is community safety.
Training	
<i>The sector currently maintains three registered training organisations, triplicating efforts in several areas.</i>	We agree there is room for the sharing of resources and the amalgamation of some core training modules. This cannot be at the expense of the operationally-specific training requirements.
<i>This approach leads to inconsistencies in training requirements and approaches</i>	We are keen to better understand this. In some cases, these inconsistencies would be due to the inherent differences between an organisation comprising mainly paid staff and one which is primarily volunteers while others may be an outcome of tailoring specific courses to the particular requirements of a region or brigade. We would suggest the core issue is that ESOs do not always recognise the training legitimacy of each other. A good start would be gaining support from all ESOs that nationally accredited training will be universally recognised.
<i>There is demand for non-operational training.</i>	We agree. The majority of training resources are invested in operational training. Additional resourcing would allow a broader focus.
<i>Volunteers from regional areas are also concerned about a lack of access to training.</i>	We agree. This is caused by a combination of regional diversity, limited resources and availability of volunteers.
Community education and community resilience	
<i>There are clearly inefficiencies and duplication of effort in the delivery of community safety programs which take a siloed approach across hazards.</i>	We agree consistency in safety messages is essential. While we do use subject experts to educate the community about various risks (this gives them credibility) we do not agree that we



Key statements provided in the A SAFER Community Discussion Paper	CFS staff response
	take a siloed approach – we work cooperatively and collaboratively with other agencies.
<i>There is evidence of duplication across programs e.g. smoke alarm campaigns</i>	We are keen to examine this evidence, as this has not been our experience.
<i>There are clear discrepancies and inconsistencies between hazard specific community engagement and preparedness programs.</i>	We are keen to investigate this further as inconsistencies should not occur and there are clear boundaries and expertise which complements each other's program. The community engagement programs are developed with consideration and in consultation with our partner agencies both within in the sector, within government, NGOs and with community groups.
<i>There are challenges in sustaining the nexus between the national resilience and emergency management reform agendas, and the programs delivered by the three ESOs</i>	CFS works collaboratively with local and interstate ESOs. CFS Information Operations (Community Engagement, Media, Website, Social Media and Communications) has developed strategic objectives that align to the national disaster resilience framework. All CFS Community Engagement programs are mapped against the IAP2 spectrum. Program Logic has been developed which documents their program output and outcomes which KPI's can be set and measured against.
<i>Arrangements where boundaries for zone emergency management purposes are inconsistent with those for bushfire management committees and had led to a duplication of effort</i>	<p>The Zone Emergency Management Committee (ZEMC) has been conducting workshops to address all hazard risks with local government participants. This consultation has been part of the National Emergency Risk Assessment Guidelines assessment process. CFS has been conducting bushfire management planning meetings with local government.</p> <p>This may be perceived as a duplication of effort, however a more closely aligned reporting arrangement where boundaries that overlap and an assurance that bushfire risk is being reported to the appropriate ZEMC's is required and will simplify reporting.</p>
Procurement and capital management	
<i>There are inefficiencies within the sector associated with duplication of procurement and asset management activities and resources including staff</i>	We are keen to better understand this duplication. SAFECOM's lack of resourcing led to ESOs having to take on the administrative functions of procurement and asset management to the detriment of other activities.



Key statements provided in the A SAFER Community Discussion Paper	CFS staff response
<i>Agency-led capital acquisition programs have led to incompatible technology links within the sector and external stakeholders</i>	We agree that ESOs have not developed or adopted sector wide standards. From our experience, this is typically borne out of striving to align specific operational requirements with budgetary limitations. We are keen to understand whether, following sector reform, the government will invest in a shared platform.
<i>A decentralised procurement approach minimises opportunities for bulk purchase savings ... and introduces challenges and risks from an accountability and governance perspective</i>	We agree. The FTE reduction in SAFECOM led to ESOs having to undertake their own procurement activities using staff with limited or no procurement knowledge or experience.
Administration and business support	
<i>There is a lack of strategic and business (corporate) services within the sector – largely due to FTE reduction within SAFECOM</i>	We agree.
<i>There is a strong perception that this has increased the administrative burden on volunteers</i>	We agree. The administrative burden on volunteers has increased as it has on staff too who must ensure volunteers meet all processes and outcomes required by government (i.e. financial reporting).
Community Services Fund	
<i>Views on whether volunteers should receive a reduction in the ESL have been raised at most forums – some for and some against.</i>	We do not have a position on this matter. We are aware that the recent increase to the ESL has upset many volunteers who feel the increases are exorbitant and unfair.
<i>Volunteer Marine Rescue</i>	This is outside our remit.



2. Our feedback on the possible Sector Model and Regional Operations

CFS staff appreciate the opportunity to provide feedback on the proposed sector model. However, we feel that not enough information has been provided in the model to give the specific comment requested.

We are also concerned that the focus of the model, and the Discussion Paper, is on structure rather than function, and that the fundamental issue underpinning most of the current shortcomings in the emergency service sector has not been addressed – adequate resourcing.

This model seems to promote a rearrangement of resources (and potential reduction) when a substantial injection of additional support is what is most required. We agree some efficiencies can be found but to assume this is the sole answer creates great risk to the operations of the ESOs and ultimately to community safety.

We are also disappointed that the Discussion Paper, and the model emanating from the assumptions within it, focuses on perceptions of what is not working. Very little attention has been given to what is working and the efficiencies each ESO has already delivered, particularly given the decline of SAFECOM.

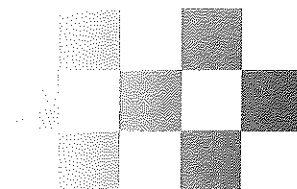
The proposed model seems to offer a reinvention of the ESAU and SAFECOM models which have not been effective. We are afraid that not only are past failures being built upon, they are being expanded. The proposed model centralises and corporatises functions – beyond those in the previous model – and which are wholly operational and need to be embedded at the frontline.

We support initiatives that encourage integration, improve efficiency and make our community safer. We are concerned that the speed at which this reform is occurring may not achieve that and we are worried that some of the assumptions upon which decisions are based are not accurate.

General comments about the proposed model

The current model:

- Does not demonstrate an understanding of the complexity of our organisation and the interrelationships among paid staff and volunteers, and frontline and frontline support staff.
- Seems to be based on arbitrary definitions of operational and non-operational, or 'frontline' and 'support'. The type of work we do, and the way we must operate to protect the community, doesn't allow such an easy demarcation.
- Shows an appreciation that certain functions must be managed at a strategic level but delivered as a regional function – this is contingent on ensuring that regional staff are experts in their fields (particularly in areas such as operational coordinators, training and development, regional prevention, regional planning, administrative support and community engagement) not generalists as this will dilute the effectiveness and efficiency of service.
- Brings together all strategic administrative/business support services under the Strategic and Corporate Services function, which is essentially SAFECOM. It is this area that will most benefit from centralisation and shared efficiencies, as long as it is managed and resourced appropriately and that specialist requirements are delivered regionally by individual agencies.



- May not recognise, particularly given some of the statements within the Discussion Paper about lack of integration, that strategic coordination often occurs beyond organisation level and is already cross-agency both at a state and national level
- Does not align functions according to their operational interdependencies – for example, our community engagement, public information and media teams work in unity to ensure consistency and alignment with the PPRR framework in messaging across the board range of statewide and regionally-based activities. These roles fit together within operational support at a state level with community engagement embedded within the regions and reporting back to state.
- Some key functions have been left off the model altogether including: regional volunteer support regional prevention, regional planning, regional training and regional business services
- Seems to require more resources that we currently have and may result in further duplication of effort because it is essential that regional specialists are embedded in each region.

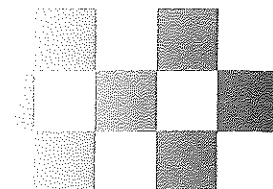
What we believe needs to happen next

We are concerned that the pace of this reform process may leave substantial issues in its wake. Given it has been about 15 years since it became a government priority to integrate and drive efficiencies through the centralisation of the emergency sector (starting with ESAU) we strongly believe a more reasoned approach be followed.

Further, while we appreciate the opportunity to provide feedback, we are concerned that we are being asked to provide comment on a structure built on foundations we do not and cannot support. We do not believe a substantial amount of the statements made in the Discussion Paper are evidence-based, and yet we are the people who can provide that information, or at least set the context.

To this end, CFS staff believe the following needs to occur before any further sector models are proposed:

- Audit and review of each ESO to clearly establish what we do, how we do it, and the resources we use
- Audit and review the inter-agency activities already occurring to assess whether proposed structural changes will have any effect
- Ground-truth the assumptions on which the sector model has been developed (some of the statements made in the Discussion Paper are rejected outright by CFS staff and many are strongly questioned, and we would welcome the opportunity to clarify these misunderstandings
- Consult more directly with operational staff to ensure informed decisions are being made, and potential impacts are identified
- Clearly identify the weaknesses (and any strengths) of the previous ESAU and SAFECOM models to ensure mistakes are not repeated
- Initiate a comprehensive change management program to maximise understanding and support for the changes and also mitigate the risk of dissent and disenfranchisement. We believe the



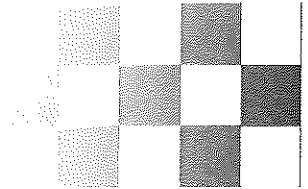
Change@SouthAustralia model offers a strong framework for consideration. More information is available at: <http://change.sa.gov.au/>

Generally speaking, CFS staff support the centralisation and integration of services where it will increase efficiency, efficacy and service to the community. But the model must be operationally sound and must contribute to our shared goal of making the community safer.

CFS staff would welcome the opportunity to provide that operational feedback and help to ensure the sector reform process positions us all to thrive in future years. We are not motivated by protecting our patch. We are passionate about protecting our community.



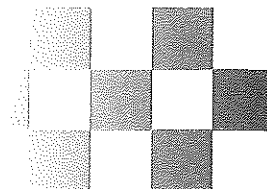
*CFS believes all our work is operational.
As an example: information provision, as a tool for prevention and preparedness,
is a frontline, operational activity rather than a corporate support service.*



3. Detailed discussion of 10 priority areas

CFS staff have identified 10 key areas of concern for your consideration. These are:

- Agility/history of adaption to change
- Business excellence
- Culture
- Volunteers
- Staff
- Community engagement and resilience
- Training
- Resources
- Lessons learned
- Change management



Agility/history of adaption to change

Key messages

CFS has a long history of adapting to changing government and community expectations.

We have learned some lessons the hard way and have emerged with a best practice approach and a keen focus on community safety.

We have dedicated resources to capture and embed lessons learned to ensure a culture of continuous improvement.

We are concerned this will be lost under the new sector model.

South Australia's Country Fire Service has a history of adapting to emerging community requirements and expectations, an embedded process for capturing lessons learned and championing constant improvement, and a culture of providing continuity and surety of service.

In particular, during the past 10 years, the CFS's operations have been informed and influenced by a range of investigations, inquiries and initiatives. They include:

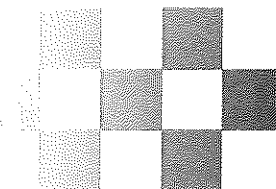
- National Warning Framework
- Dr Bob Smith Report
- Project Phoenix
- South Australian Bushfire Taskforce
- Wangary Coronial Investigation
- Victorian Royal Commission
- Bushfire Natural Hazard Cooperative Research Centre.

Many of these stem from the tragedy of the 2005 Wangary Fire (Black Tuesday) fires, which forever changed the way the CFS operates.

Internally, we established a Lessons Learned Division (as part of our recent internal restructure, a staff member (1 x FTE) at a managerial level is now dedicated to Risks and the Lessons Learned process to monitor, capture and assess our operations and implement change as required). We also conduct an Annual Post Season Review to analyse the events of the season, assess our conduct and identify areas requiring improvement. These are not back-slapping events; we actively critique our own actions and look for opportunities to make the community safer.

There is a risk this will be lost under the proposed sector reform model.

From an overarching perspective, we may lose our culture of adaptation and agility and our extensive corporate and operational knowledge, built over many years and, in some cases, emanating from some hard lessons learned. This 'can do' approach is what powers the CFS.



Some of the more specific advancements and attributes the CFS is at risk of losing under the proposed model are:

- Our reserve capacity and response teams
- Work systems unique to the CFS (such as CRIIMSON and IRIS) enabling Incident Management Teams and regions to establish a common operating picture which aids effective coordination, communication and planning for incidents
- Best practice standards for our State Aviation Operations
- Codes of Practice e.g. Grain Harvesting Code of Practice
- Cloud technology and web systems for the delivery of public information and the volunteer portal.

"The proposed changes appear to be based on perception that savings can be achieved and returned to support volunteers.

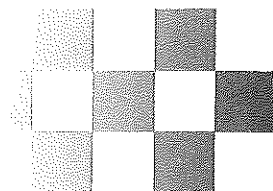
Even with efficiencies in a combined sector model the efficiencies would only achieve workloads being reduced to a more reasonable level and there will be no savings.

Volunteers are expecting additional \$\$'s in their Group/Brigade budgets and this is not achievable - consequence will be disgruntled volunteers and further negative impact on top of the ESL issues."

Comment from CFS Staff Survey, October 2014



A history of inquests, research and government reforms have shaped the way CFS conducts its operations



Business excellence

Key messages

It is important to also investigate what is working well within and among the ESOs

Compliance with the myriad legislative frameworks is directly linked to funding – we need to ensure our commitments are maintained during and after the reform.

The CFS operates under a risk-based model and use the nationally recognised AIIMS-4 framework for incident management.

Our RTO and community engagement models are national recognised and used by other states.

The Discussion Paper focuses on what has been identified as not working across the emergency services sector. It does not address what is working well within and among the three ESOs. CFS staff are concerned that our commitment to business excellence may be overlooked in any amalgamation and our key differentiators in service delivery may be lost. We assume the other agencies may also share these concerns.

CFS operates under an extensive matrix of legislative and policy agendas. In addition to *the Fire and Emergency Services Act 2005*, the frameworks we operate under include:

- Building Code of Australia
- Development Act 1993
- National Strategy for Disaster Resilience
- AFAC Positions and Guidelines
- National Emergency Risk Assessment Guidelines
- South Australia's State Strategic Plan – T20 targets
- Bushfire Risk Management – Legislation
- Australian Skills Quality Authority (as an RTO)

And internally:

- CFS Strategic Plan
- CFS Business Plan
- CFS Governance.

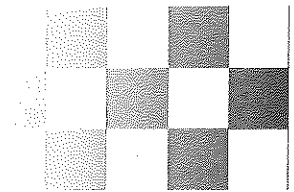
Compliance with and commitment to these doctrines are directly linked to funding for our organisation. Under the proposed sector reform, it is essential to fully understand and take into account all of our obligations to ensure they will continue being met and appropriately funded.

CFS frontline training awarded

CFS's Senior Curriculum Development Officer – Incident Management – David Campbell, was announced as the winner of the 'National Emergency Services Training Award' in September this year.

This is a prestigious and highly sought after award and recognises those in the emergency services environment who are at the leading edge of training development and delivery.

The award stated: "David has demonstrated the award criteria through the development and delivery of the Incident Management Exercise Program (IMEX). The results were immediately seen during the 2013/2014 fire season where Regions demonstrated the capability to deploy trained personnel to manage incidents. Many participants commented on how the participation in the program equipped them to confidently step into an IMT role and perform with confidence".



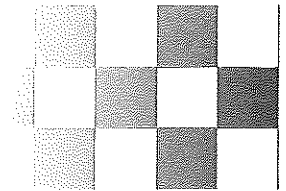
CFS leads by example

It is challenging aligning and meeting the requirements of a multitude of governing principles while also striving for excellence in service delivery. We believe we have achieved this, with room for continuous improvement. The CFS, through the commitment and unity of staff, has actively and purposefully positioned ourselves as an industry leader, with several points of difference. This includes:

- We operate according to a risk-based model.
- This is embedded through our *Standards of Fire and Emergency Cover* (SFEC) for resourcing. These standards ensure a standardised, risk-based, all hazards approach throughout the state, tailored to the Brigade and Group level. It allows us to allocate resources according to risk, thereby ensuring efficiency and equity. This is implemented in parallel with Bushfire Management Area Plans for the nine identified areas and it is fully integrated with the Commonwealth Government's PPRR (Prevention, Preparedness, Response and Recovery) in support of community resilience.
- We have actively adopted the fourth edition of the Australasian Inter-Service Incident Management System (AIIMS) model.
- This update, among other revisions, promotes the role of public information provision within the Incident Management Team function. The CFS has fully embraced the essential role of timely information provision as part of our emergency management response thereby contributing to a safer community.
- CFS manages incidents according to the national fire and emergency services doctrine.
- This common doctrine enables CFS to seamlessly integrate into any operations under the control of the SA Metropolitan Fire Service, the State Emergency Service, DEWNR, SA Police or when supporting fire and emergency service agencies on operations interstate or overseas.
- Our RTO has been nationally recognised (refer case study on page 19)
- CFS is nationally recognised in community engagement – our model for engagement is based on the International Association for Public Participation (IAP2) and has been replicated in other states. All CFS's programs are informed by recognised research and we have implemented best practice models for engaging directly and indirectly with community.
- CFS is nationally recognised for the leadership role it took in setting up collaborative procurement arrangements between AFAC member agencies.

"I don't believe there is substantial duplication of effort, the outcomes required to provide service delivery to the community differs across the service delivery model, i.e. requirements to support volunteers vs support for career staff, or it's not as simple as saying community engagement is community engagement, the intricacies of the risk being dealt with and how best to deliver the service to the community will drive the requirements, not just mashing together what might have a similar title."

Comment from CFS Staff Survey, October 2014



Culture

Key messages

CFS culture plays a key role in our standards of service delivery

We go beyond the call of duty because we are passionate about the organisation and the communities we service

If our culture is lost, our high levels of productivity and 'can do' approach may disappear too.

Many CFS staff are volunteers also, it typically goes unrecognised.

Every organisation has a culture: the unwritten rules of how we behave; the characteristics that drive our loyalty and commitment beyond wages, employment conditions and position descriptions.

The culture of CFS is integral to our position as a high-performing organisation. Our structure is distinct from most organisations in that the roles of volunteers and paid staff are intrinsically linked, the ratio of volunteers to staff is disproportionate and operational responsibilities are inverted.

Yet it is our culture which sets us apart.

CFS staff and volunteers share a strong bond and immense pride in being part of the CFS and it is this mutual sense of belonging and community responsibility that underpins our excellent working relationships and unquestionable unity. We like wearing the same badge. We know each other by name. It can be hard to differentiate between a paid staff member and a volunteer.

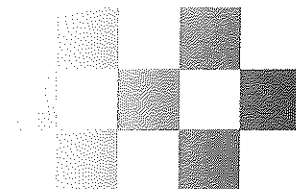
It isn't just volunteers who donate their time

In CFS, volunteerism doesn't just sit with volunteers. Most of the paid members take on additional roles, above and beyond our paid positions and we are all prepared to work 24/7 to protect our community. Indeed, there is an unspoken expectation that we need to prioritise work over family – that the safety of the wider community must always take precedence. If we worked to rule, the organisation would cease to function and we would have a state of disenfranchised volunteers.

We are concerned that the amount of additional resources provided to the CFS, free and out of goodwill from CFS staff may not be appreciated or identified to date.

The expertise of CFS staff goes beyond our daily operational roles. We are highly skilled and experienced at working alongside and managing volunteers. This is not a small feat given the size of our volunteer base and the relatively small team of paid employees (roughly 1% or 1 paid staff member per 100 volunteers). We work really hard at maintaining strong, positive relationships with our volunteers.

To get the most from volunteers, you need to invest time. You must provide support, empathy, understanding and, above all, you must listen. Volunteers will not be dictated to or bossed around. CFS staff, in addition to our daily jobs, spend a considerable amount of time maintaining a high level of engagement with volunteers (through phone calls, meetings, training, as an example).



Our culture underpins our performance

We are concerned that the drive for efficiency in this Sector Reform overlooks the essential investment required in managing volunteers. We are concerned that our cultural characteristics of volunteerism, 'can-do' and just getting on with the job have not been valued. Further, we are greatly concerned they will be lost in this reform, with impacts going beyond workforce disenfranchisement to reduced efficiency, greater costs and reduced community safety.

We believe one of the key priorities for this Sector Reform process, specifically in regard to gaining stakeholder feedback, is in arriving at a clear definition of 'operational' and 'non-operational' or 'frontline' and 'support'. At the moment, those definitions seem arbitrary and based on a 'typical' government agency model.

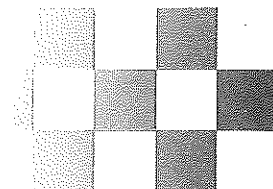
At CFS, we make no such distinction: we are all operational, we are all frontline. This is because our roles are inherently linked. While only some paid staff literally put out fires, we all provide the operational support in managing emergency responses. And we all play a frontline role in prevention. This is why we continue to deliver service excellence despite a reduction in support from SAFECOM.

Removing operational functions which sit well outside corporate business services (such as finance, procurement, WHS - which can be delivered from a centralised unit if resourced) from the coalface and merging them with back-office administration responsibilities undermines the key role they play in educating, preparing and protecting communities from fires and other critical incidents.

"Bigger agencies result in greater distance to the coal face. Care needs to be taken that a sector amalgamation doesn't add new layers of bureaucracy as has been seen previously with ESAU and SAFECOM iterations.

The greatest risk will lie with conditions of employment (with MFS) which could result in no opportunity for volunteers to be recruited. This would quickly change the culture and volunteers will not be engaged."

Comment from CFS Staff Survey, October 2014



Volunteers

Key messages

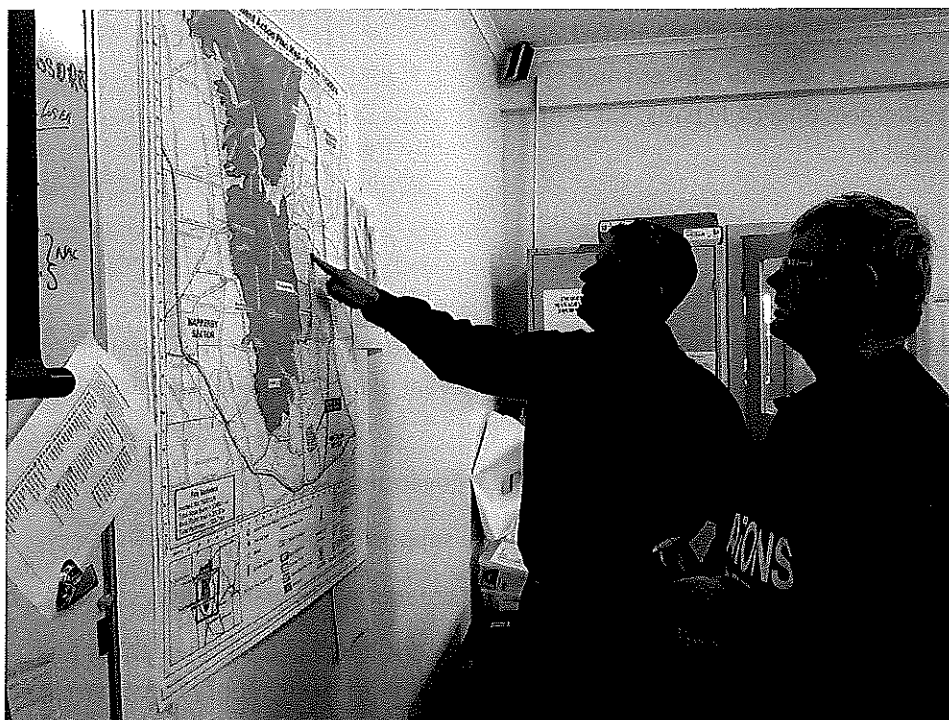
If the reform is not correctly managed, we will lose volunteers.

We are concerned the proposed sector model does not account for the interdependent roles of paid staff and volunteers.

Any dilution to the services and support provided to volunteers will result in the reduction of volunteer numbers.

There are no contingencies in place – if we lose volunteers we may lose services.

CFS staff and volunteers are closely intertwined: we work alongside each other, we respect each other and we trust each other. It is the support provided by CFS staff that provides the foundation and framework for the volunteers to excel in their roles and continue their commitment to rural fire protection and prevention.

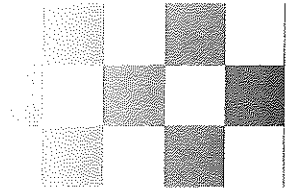


The roles of volunteers and CFS paid staff are integrated; we work as one team

The rural community's safety is contingent on about 13,500 people donating their time. In return, volunteers expect a certain level of support, service and appreciation.

In our experience, they want personalised, localised, empathic and responsive backing. Volunteers are donating their time and expertise to their community—their friends, families and neighbours—and they want localised support.

Our concern is that the proposed sector model seems to assume that the same support services can be provided by a detached, centralised service without impact. Even though the model shows regional



support, it is difficult to ascertain how this will work in implementation, given the function has been corporatised and centralised. There is a substantial difference between a head office service being delivered regionally and a function embedded within and dedicated to a regional team.

We need to keep our volunteers

The greatest risk to community safety is the loss of volunteer firefighters.

The greatest risk stemming from the proposed model - if it is not properly calibrated or implemented correctly and in an appropriate timeframe - is the loss of CFS volunteers and staff.

Such an outcome will impact on everyone. As staff passionate about the past, present and future of the CFS, we urge very careful consideration of this potential risk.

There is already evidence of volunteer dissatisfaction with the Sector Reform process. We hear concern and frustration from volunteers on a daily basis. Some of the feedback we've heard is:

- they are concerned about the cultural ramifications of striving to merge a highly committed volunteer team with a high unionised, paid workforce
- further, volunteers work within an Incident Management Structure (as the CFS is committed to the AIMS-4 model) which is not dependent on rank but relevant experience and expertise; they are worried this approach will be compromised
- they are motivated to work for their community, not a government agency
- they are not clear about how and by whom they will be supported
- they like dealing with staff wearing the same badge – it creates a 'one team' ethos.

We believe any dilution to the services and support provided to volunteers (both in quantity and quality) will result in the reduction of volunteer numbers and therefore emergency response capacity and capabilities across the state.

It is true that, in recent years, volunteers have taken on increased administrative tasks and faced mounting red tape. This is due to two key reasons:

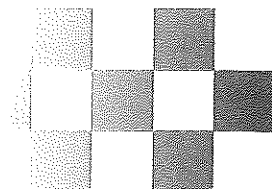
- increased requirements for governance and accountability
- a domino effect created within the CFS by the reduction in support and services by SAFECOM, the current centralised, corporate function.

"Conducting daily business with volunteers does not happen solely between the nominated 7.5 daily working hours. Many volunteers cannot make phone calls or emails until they too, have completed their daily work and often do their volunteer planning / business in their own time.

There does not appear to be any capturing of data to reflect just how many out of hours business dealings CFS staff conduct with our volunteers. It goes to say that there is a lack of remuneration also for being engaged in employment matters whilst a CFS staff member is in family time or personal time.

The end result could be quite detrimental to frontline service if all staff turned their phones and pagers off at the end of their 7.5 hrs shift."

Comment from CFS Staff Survey, October 2014



CFS staff are not clear how the proposed sector model will address these issues without substantial additional resources, particularly given this was also meant to be a clear priority of the SAFECOM model, and the Emergency Services Administration Unit before that.

There are no contingencies in place

Volunteers are the only source of emergency response in many areas and there is no contingency planning in place if these services are withdrawn. Volunteer knowledge and experience is irreplaceable in managing emergency responses and could not be replaced in the short term from 'frontline' staff from other services such as MFS and SES. We are concerned that volunteers' passion and commitment may be tested under this model if it does not result in appropriate resources delivered to them in an appropriate way.

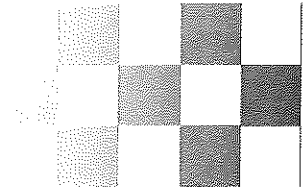
The quote below is from the CFSVA, released before the details of the sector reform. We believe it accurately demonstrates the general sentiment of our volunteer colleagues:

"The Country Fire Service "volunteer workforce" has no "Enterprise Agreement" as paid employees have with their employer, which results in underfunding and changes made at will by Government with the expectation that volunteers will simply "cope".

"Many volunteers feel that their services are being "taken for granted" and or not "valued" by Government, as it appears that only at election time or at a time of crisis, such as a Coronial inquiry that positive funding changes are made to the CFS.

"There have been a number of changes brought to volunteers by Government which has seen the CFS change from principally a locally managed "rural" service to a multi-faceted all hazards fire and rescue service underpinned by SOP's, COSO's AIIMS, CRIIMSON, AIIRS, and WH&S. If CFS volunteers were a "paid" workforce there would have been a series of "Enterprise Agreements" which would have rewarded volunteers with annual increases in remuneration, as there has been the requirement for increase productivity (multi skilling) and flexibility by volunteers which reflects the changing Government, Community and CFS needs over time."¹

¹ CFSVA Policies Committee, Building the CFS 2014 and beyond – Partnership objectives between CFSVA, CFS and Government, November 2013



Staff

Key messages

We are a highly dedicated, passionate workforce who work well beyond the parameters of our job descriptions.

We are 1% of the total CFS workforce and dedicate a substantial amount of time developing strong relationships with our volunteers.

Our work is operational too – we work alongside our volunteer colleagues in preventing and managing and coordinating emergencies.

We do not enjoy the same employment conditions as our MFS counterparts. Under the new model, equity is essential.

“The Minister may not be fully aware how much of a disruption to personal lives and relationships comes with our work - CFS staff are every bit as passionate as volunteers, and loyalty to the CFS brand encourages us to go above and beyond constantly.

The organisation would collapse if we worked to rule. A loss of that identity may cause staff to leave, or to sacrifice less for their work.”

Comment from CFS Staff Survey, October 2014

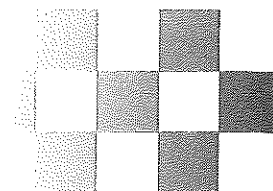
We wish to reinforce that our response to the Discussion Paper and the more recently released possible sector model is not about maintaining the status quo or protecting our patch. Nor is our key motivation keeping our jobs. We are passionate about the CFS - its history, present and future - and the communities we serve. We want to ensure that decisions which will have far-reaching, long-term impact are evidence-based and fully considered.

CFS has a low turnover of staff. It is not uncommon for employees to have provided 25 to 30 years service to the

organisation. Our loyalty and dedication is a real asset that might be intangible now, when considering the sector's reform, but will have a tangible impact on service delivery if that commitment is lost along with the CFS culture.

Within the Country Fire Service, staff numbers (currently just over 130) are about 1 per cent of the total workforce, with volunteers making up the remainder (about 13,500). For every one of us, there are 100 volunteers requiring support in a diversity of areas across six regions. This support ranges from providing administrative services to working alongside them in emergency situations to protect the community. Much of our focus is on preventing fires and other critical incidents through education and engagement.

The fact we continue to be effective in supporting our volunteers and meeting our own specific job responsibilities, while also taking on additional responsibilities due to a reduction in service levels from SAFECOM, demonstrates our shared commitment to the CFS and the community. We are a passionate team.



CFS staff are volunteers too

When we volunteer our time, either on a daily basis by working well beyond our job descriptions and employment conditions or in a heightened response to an emergency situation, it often goes unnoticed outside the organisation. While that typically does not concern us, we are worried that this mostly unseen effort may not be appreciated or considered during this sector reform process.

Corporatising and centralising frontline support staff runs the risk of breaking the inherent bond between staff, volunteers and specific communities. For staff, and volunteers, this is likely to lead to disenfranchisement and the government and community may lose substantial resources they did not appreciate they were relying on. As we have stated before, if all the services proposed in the sector model are centralised, there will be substantial gaps left at the frontline.

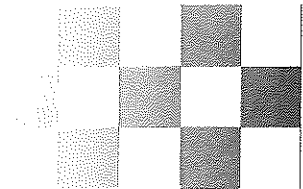
Equity is essential – do the same job, get the same pay

In addition to this core resourcing issue, we have identified other key considerations below stemming from the proposed model:

- There must be parity and equity for salary and wages across the sector
- Employment terms and conditions must be applied equally across the entire sector (and enshrined in prescriptive legislation) including standard roster conditions
- All staff must be recognised as providing services beyond regular 'core' hours, which is different from most other government agencies
- There must be recognition of the operational roles performed by all staff (uniformed and non-uniformed) and consideration of remuneration of those tasks
- Consistent remuneration for similar roles performed (e.g. specialist functions / on call allowance) and in line with interstate agencies
- Career development opportunities applied consistently with improved and embedded succession planning
- Promotions to be based on skills, experience, knowledge and qualifications, not just rank and years of service
- Lateral movement opportunities within the sector and across the three delivery agencies must be championed to build a multi-skilled workforce

Our core concern is the delineation and definition of operational and non-operational workers. This is not a language we use. As you would be aware, the CFS underwent an organisational restructure in 2013 to better align our delivery model with community requirements and resource allocation. In this structure, we are all identified as frontline staff. We all provide operational support and services, we are all in the business of preventing, mitigating and managing bushfires and other emergency incidents.

Wherever the line is drawn between these definitions, it is essential the impact this will have on frontline operations and community safety is clearly identified and appropriately resourced through other mechanisms.



Community engagement and resilience

Key messages

CFS is nationally recognised for our community engagement expertise.

We position community engagement as a core operational function, consistent with Best Practice models and leading incident management frameworks.

We are concerned the importance of state managed regionally-embedded community engagement has been overlooked in the possible sector model.

We actively work to avoid duplication and mixed-messaging across agencies.

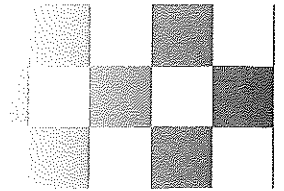


CFS's community engagement programs are built on best practice and have been adopted in many other states

The provision of public information in a timely, appropriate manner is now widely recognised as a tenet of effective prevention, mitigation and management of bushfires and other emergency incidents. It is a foundation on which community resilience is built.

CFS is nationally recognised for our community engagement strategy and programs. This is a natural extension of our organisational culture, where we are deeply embedded within local communities, because the vast majority of our workforce comes from those communities and volunteer their time to protect their friends, families and neighbours.

Further to this, CFS truly understands the essential role active engagement and education plays in keeping communities safe. The hard lessons we learned from the Wangary 2005 (Black Tuesday) bushfire, and comparable events in other states, such as the Victorian 2009 Black Saturday bushfires, has led us to the position we are now in – we know that tailored education, engagement, information and empowerment



(which are now embedded as critical operational functions) play a core role in protecting people before, during and after any fire event, to help them avoid their occurrence in the first place and support individual, household and community resilience.

Important to also look at community engagement excellence

Accordingly, we were disappointed the Discussion Paper does not focus on any of the excellent work the CFS has done in engaging with communities and thereby contributing to the preparedness of communities and building their resilience to natural disasters, including bushfires.

We are also highly concerned that in the possible sector model, the roles of community engagement have been split from public information and media within the corporate tier. The diversity of the local communities we serve requires tailored activities and regional knowledge. This is why CFS has adopted a community engagement model which is managed and resourced through the state with local community engagement outreach staff embedded in the community, delivering these state coordinated and locally targeted programs.

CFS's Firey Women program nationally recognised

The CFS's Firey Women program trains women in bushfire safety skills. The program was the 2011 Australian Safer Communities State Winner and received a 2011 Australian Safer Communities National – Highly Commendation. Research into the Wangary fires suggested that women specifically require bushfire safety information and education. On the day of the fires, a significant number of household members with fire fighting skills - generally men - were away from home and women were left to defend the property. Many women did not know what fire fighting equipment to use or how to use it.

Women are more likely than men to evacuate at the last minute - and not without their children. This puts them at great risk if they lack knowledge of bushfire safety.

This was reinforced in a research paper² by the Bushfire Cooperative Research Centre which evaluated the effectiveness of localised community engagement, following the placement of a Community Engagement Officer in the Lower Eyre Peninsula region not long after the devastating Wangary fire in 2005. Findings included:

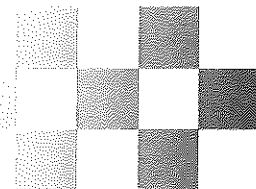
"The CFS is to be commended on the initiative involved in the initial appointment, on the support shown to the Officer and the program, and for allowing the Officer the freedom to develop the program in accordance with local needs and other community and organisational dynamics."

"The Lower Eyre Peninsula Community Engagement Program has and will form a model for future programs. This is in large part due to the flexibility with which it has developed allowing for local initiatives to be pursued. The Community

Engagement role in other parts of South Australia could be compared and contrasted with that of the worker on the Lower Eyre.

"The experience and understanding of community engagement provided by this Community Engagement program has suggested ways in which programs of this type might be enhanced in the future. It is to be hoped that the fire services will find the resources and the will to investigate these future possibilities."

² H. Goodman, 'The emerging role of the Community Educator - A case study on the Lower Eyre Peninsula' Internal Report to the Country Fire Service Community Education Unit, RMIT/Bushfire CRC May 2009.



Further, the paper presents a comment from a community member about the importance of having staff who are perceived as part of the community:

"[She] has been through it, which I think is a pretty good leg in the door, you know. It's not like a Johnny-come-lately, who's never been through it and doesn't know ... You know, they might know all the right words, might know how to read all the books, but physically [they] haven't been there. "

Ours is a cooperative, consultative approach

CFS actively cooperates with our agency partners—particularly the MFS—to ensure no duplication of programs or campaigns occurs and that all areas of the state have access to accurate and quality information including accessible formats. We would appreciate further investigation of the evidence cited as examples of duplications and discrepancies in the Discussion Paper.

Our strategic approach to information provision and community engagement stems from a multitude of recommendations from inquiries and commissions following the Wangary fires in 2005 and are enshrined in world's best practice models we use such as the AIMS-4 doctrine (which specifically elevates public information provision as a key function of Incident Management Teams) and the IAP2 model for public participation.

Strategic communication needs to remain at a corporate level while servicing regions, as a state-wide focus is required and hence this is where it is best positioned. It is critical for public safety that messages are aligned.

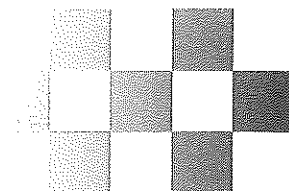
Further, remembering that in regional centres, the community and the CFS are one and the same; to lose the intense engagement with a community could mean an effective loss of a fire service.

"Information flow is essential to community safety and we have worked VERY hard to create cultural change where the "people stuff" is valued operationally.

This has had a huge impact on public safety as information flow to the public during operations (among other things) has increased significantly.

This closer relationship also protects the public opinion of the organisation and the government."

Comment from CFS Staff Survey, October 2014



Training

Key messages

While efficiencies can occur across the sector, what is most needed is a substantial investment of additional resources in the right places.

Our Standards of Fire and Emergency Cover model for resourcing informs our approach to training and ensures a standardised, risk-based, all hazards approach throughout the state.

The ranks of volunteer trainers are diminishing rapidly – we have lost 600 volunteer trainers in 4 years.

CFS would benefit from the injection of additional resources into professional development.

There are inequities between the wages and conditions of training staff across the three agencies.

There are opportunities for increased multi-agency training delivery across the three ESOs and there are opportunities to ensure wider access to training and assessment. However, the CFS's dispersed regional workforce (paid and volunteer) brings challenges in achieving this. For example, the CFS has an excellent online /e-learning initiative called the Volunteer Portal – a secure website which enables the latest training information and support documentation to be immediately available to volunteers. However, its benefits are limited in that online training is not an effective medium for operational training and not all volunteers have the ability to access the service due to infrastructure constraints.

While efficiencies can occur across the sector, what is most needed is a substantial investment of additional resources in the right places.

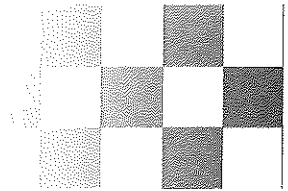
Our effectiveness in training is achieved due to the typical approach of the CFS – we use a little to achieve a lot – so we are concerned there may be an assumption that the merging of any duplicated services across agencies will lead to savings within the sector, when the answer to maintaining an appropriately trained and prepared workforce lies in additional investment.

We are also concerned that the high standard, organisation-specific training delivered by CFS may be diminished if any amalgamation strives to remove the cultural characteristics of our approach: training volunteers and using volunteers as trainers alongside paid staff across a diversity of communities is a very different model from an organisation comprising all paid staff dealing with similar emergency situations.

Our Standards of Fire and Emergency Cover model ensures consistency

The use of our *Standards of Fire and Emergency Cover* (SFEC) model for resourcing informs our approach to training. It ensures a standardised, risk-based, all hazards approach throughout the state, tailored to the Brigade and Group level. The SFEC recognises that, beyond core competencies, there is not a one-size-fits-all approach and training needs to be tailored to the specific risk profile of individual communities and capabilities of local volunteers.

This rings true even for the way training is delivered. As an example, most of the training delivered to volunteers within the CFS occurs after hours and on weekends, when volunteers are typically available. This can bring additional costs.



"A CFS firefighter is trained as well as an MFS firefighter. It is not unreasonable to have 2 training centres for the 3 ESO's.

If this is reduced to one there will be longer delays with training people and will paid firefighters be given preference over volunteer firefighters?

There is currently not enough training opportunities for volunteers now!"

Comment from CFS Staff Survey, October 2014

The SFEC is also a clear example of our commitment to business excellence and demonstrates the additional measures a statewide, rural based emergency service must take to ensure consistency and to manage risk appropriately across disparate communities.

The current training delivery model within the CFS sees a core of paid trainers and assessors supported by an army of volunteers embedded in regions. But the ranks of volunteer trainers are diminishing rapidly – we have lost 600 volunteer trainers in 4 years. This loss of regional and

state based volunteer assessors is due to many factors including the increased demands of today's lifestyle on all of us and the requirements for out of hours training.

This has led to our RTO being under financed and under resourced. If there is to be just one RTO across the sector, it must be adequately resourced by a combination of full-time, part-time and contracted specialists, stationed within regions, tailored to Brigades and Groups, and supported by volunteers.

As one example, our State Training Centre requires considerable additional investment to ensure its facilities and programs keep in line with emerging requirements – it is aging infrastructure. Further, additional decentralised training facilities will assist greatly in ensuring regionally-based training can equip our volunteers with the skills necessary to keep our communities safe.

Our current ratio of training staff to trainees highlights the need for a serious injection of additional professional, career training staff.

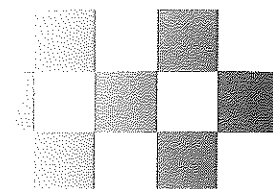
Our diversity of stakeholder requires a broad training approach

Due to the diversity of communities in which we operate, and the mixture of skills and experience of our volunteers, CFS delivers a broad roster of training and assessment to ensure consistency, capability and accreditation. CFS would also benefit from the injection of additional resources into professional development. In short, this would have two key benefits:

- on an individual level it would demonstrate recognition and reward for effort, additional career opportunities within the organisation or sector and increased knowledge sharing
- for the specific organisation and the wider sector, it would enhance skills sets, promote transferability and adaptability and contribute towards developing a sector prepared for the future.

Currently, training opportunities for staff are limited because our finite resources are primarily focussed on emergency response training rather than corporate capability.

There are inequities between the wages and conditions of training staff across the agencies which need to be addressed particularly in regards to out-of-hours training where MFS staff are remunerated at a higher level than their CFS equivalents, despite CFS having a stronger requirement for night and weekend training due to our volunteer base. A scenario which highlights these inequities is the RCR training package which allows for CFS/MFS/SES staff to all be present and teach on the same course and yet they are all remunerated differently, based on their own agency's award.



Resources

Key messages

The new sector model needs to be adequately resourced to succeed.

Resources need to be allocated equitably.

"Please do not make a decision until you are able to attend a reasonable size incident so that you can truly understand from your own firsthand experience what we do."

Comment from CFS Staff Survey, October 2014

The sector is under resourced and there are disparities in funding and funding allocations across the three ESOs. The CFS allocates resources according to a risk-based model - our *Standards of Fire and Emergency Cover (SFEC)* - to ensure efficiency and efficacy of service delivery and to maximise community safety.

CFS staff and volunteers believe that most of the issues facing our organisation and the wider emergency sector stem from a lack of resources rather than duplication and triplication of efforts as presented in the Discussion Paper.

We support the removal of inequities among the ESOs and the identification of efficiencies in the pockets of activity where duplication might exist. However, we question the additional resources this streamlining of activity will release for reinvestment into the sector and ask whether detailed analysis has been undertaken.

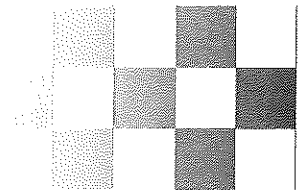
Looking at the possible sector model, and taking into account the introduction of shared, consistent industrial awards and conditions across all three ESOs, we believe it is likely the model may require substantially more resources than the current structure, just to deliver a comparable level of service to the community.

The model needs to be resourced for success

This new operational model of the sector, whatever its final configuration may be, needs to be resourced for success not failure. This will be the third time a centralised corporate model has been introduced to the sector in the past 15 years and we are not clear how the current proposed model will succeed where others have not, particularly if the root cause of most issues is a lack of funding.

The theory of centralising core, corporate services to ensure consistency, coordination and drive efficiencies while freeing up operational functions to focus on frontline services is sound; it makes sense. Yet it has not worked to date. The Discussion Paper itself reinforces that a core problem with the current SAFECOM model is a lack of resources. At the same time, there is a drive to find further efficiencies in a proposed model that appears to require more resources just to sustain its management and governance requirements.

We are keen to understand the cost / benefit analysis undertaken to date to ensure the proposed sector model – or any others – will bring sufficient savings to reinvest into essential services to improve safety for communities.



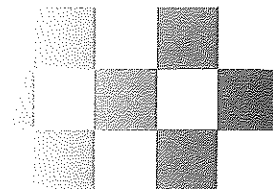
We are keen to understand what modelling may have been undertaken to date to understand the financial position of each individual ESO to identify what contribution or impact it may have from a resourcing standpoint when merged.

For example, currently the MFS does not have a sustainable operating budget – will such a shortfall be ‘shared’ within the new model, resulting in less resources for CFS and SES?

Further, Ernst & Young’s 2014 *Independent review of shared services in the fire and emergency services sector* identified a shortfall in FTE resources within SAFECOM – has a similar analysis been undertaken within the three ESOs to gain an objective position on current resourcing levels and current resourcing allocation models?

Other key areas to be addressed in any amalgamations of the ESOs include:

- FTE’s need to be employed under a common Award – this may increase staff costs for tasks currently undertaken by the CFS workforce, particularly outside business hours.
- Recognition and understanding that staff in all agencies have dual roles – both functional and operational - and an arbitrary separation of these roles without due consultation and consideration could have a serious impact on staffing costs and productivity (e.g. if an ‘admin’ person is removed from providing any frontline support, a shortfall in resourcing will occur at the frontline)
- We need to map resources to function
- Funding (specifically capital) will need to be justified and allocated using consistent standards across the state and must recognise that all communities are equal. As an example, CFS rural stations are in severe need of maintenance. In December 2008 an independent Building Replacement Review commissioned by SAFECOM and conducted by GHD consultants indicated that funding for CFS building and maintenance programs fell well below the appropriate level. No action was taken on this finding.



Lessons Learned

Key messages

This sector reform process will be the third attempt at gaining efficiencies and integration within the emergency service sector through centralisation

What are the lessons learned from the ESAU and SAFECOM models that are being translated to this strategy?

"SAFECOM was formed to provide the overarching corporate function and missed the mark.

The proposed corporate function requires strong leadership and a service delivery approach and a strong change management processes implemented."

Comment from CFS Staff Survey, October 2014

Continuous improvement is a core characteristic of the CFS. Risk management is also a focal point, as it is in every emergency service agency. Bridging these two priorities is our commitment to learning from experience, examining the success or failure of prior activity. This is delivered through our dedicated Lessons Management resource.

Accordingly, we assess every event and initiative with a similar scrutiny: what are the lessons learned?

With regard to the proposed sector model, we agree there is room for improvement within each delivery agency and we agree a level of integration throughout the sector should bring tangible benefits to the three ESOs and the community. We agree there are certain corporate functions which, if delivered to a suitable level of service in a value-for-money manner, could be centralised to allow frontline agencies to focus more on operational matters. These include WHS, HR and procurement.

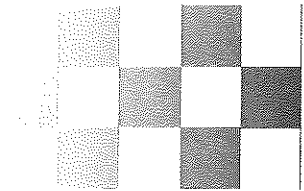
Our concern as staff, many of whom have experienced the sector's history first hand during the past 15 years, is that this will be the third time a centralised model has been championed, for similar reasons, and it is widely agreed the first two (ESAU and SAFECOM) did not achieve their purpose.

Given the pace at which this reform is occurring, we respectfully ask what are the lessons learned from the previous two models to ensure history is not repeated a third time? Further, can we benefit from the experiences of other states' reform processes such as Western Australia, Queensland and Victoria?

A considered approach is essential

We believe a considered approach is particularly important for the following reasons:

- The proposed sector model widens the range of functions to be included at a centralised, corporate level, including what we believe are frontline, operational roles such as volunteer support, community information, education and engagement.
- The delineations made in the Discussion Paper between operational/non-operational staff or frontline/support personnel do not align with CFS's definitions, which creates the potential for major operational issues and an impact on community safety.
- This approach also creates the potential of a backwards step (particularly in the area of community resilience) for CFS where we have actively implemented recommendations from the numerous inquiries and reports into our sector, and other jurisdictions interstate.



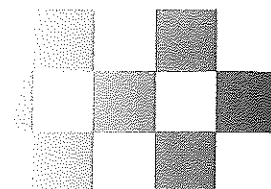
- The integrated and intertwined roles of paid staff and volunteers within the CFS, and the shared culture of 'can do' seem to have been oversimplified and do not recognise that the success of CFS stems from a 'one team' approach; arbitrary separation of roles will have long-term impacts.
- Volunteer numbers are declining and we are already seeing disenfranchisement among this group due to issues such as the increase in the Emergency Service Levy (and the impact that is having on farm fire fighting units), the reduction in support services due to reduced funding (e.g. the Volunteer Support Branch) and well-documented onerous administrative requirements.
- Given the centralisation of many operational aspects of our organisation, we are not clear how the three ESOs operational practices will merge. For example, our organisation's decision-making for resourcing and risk management is embedded in our *Standards of Fire Emergency and Cover*. Will this doctrine be adapted globally for decision-making in areas such as operational planning, IMT coordination & management, and Aviation coordination or will the CFS be expected to take on another organisation's processes?
- A scenario where volunteers are managed by United Fighting Union paid staff from the MFS will be highly problematic.

We are not resisting change and we are not looking to protect our patch for the sake of history.

Rather, we simply do not want the strengths of CFS diluted or abandoned because there has not been enough time given to analyse the contribution each individual ESO can make and the likely impacts should this change not be managed effectively. Our strengths include:

- Our brand – staff and volunteers are proud to work for CFS and communities value our contribution
- Our focus on volunteers and their communities; we understand and respect the 'mindset' of people giving their time freely
- Our 'one team', frontline-focused approach to delivering services
- Our community engagement strategies, communication channels and public information model
- Our training capability and capacity
- Our focus on business excellence
- Our commitment to remaining focussed on service delivery in the face of increasing bureaucracy
- Our can do approach based on our passion for the CFS.

Much of our strength has stemmed from our commitment to learning from past experiences. We sincerely hope this reform process will ensure the same.



Change management

Key messages

A considered approach is necessary to mitigate risk.

A dedicated change management strategy is essential to engaging with paid staff and volunteers.

Reform does not need to be rushed.

A well resourced, well defined change management strategy developed alongside the finalisation of the sector reform model is essential. Given our sector mostly comprises volunteers, we need to inform, engage, involve and enthuse this stakeholder group alongside paid staff.

We need to recognise that, within the CFS, the people responsible for communicating to volunteers will also be personally impacted.

The range of shared services currently proposed for the three ESOs, coupled with the structural realignment of these organisations, will bring widespread change to working arrangements.

In addition to this, we will need to align three different cultures. If not managed correctly, this could ultimately have a real impact on organisational effectiveness and community safety.

A key concern of CFS staff and volunteers is that the organised strength and unity of the highly unionised MFS workforce will skew the new organisation's operational approach and culture, rather than finding a common ground.

We need to learn from other states' experiences

Experiences from other states show that too much haste in driving change reduces engagement - and therefore successful implementation - while at the same time creating more stress and less productivity for staff. For the CFS this also creates the added risk that disgruntled volunteers may simply walk away. (The Queensland Fire and Emergency Services is currently embattled in a dispute with the Rural Fire Brigades Association Qld because a similar structure and process to SAs emergency sector reform was adopted without adequate consultation or consideration. These matters can usually be avoided through a tempered approach.)

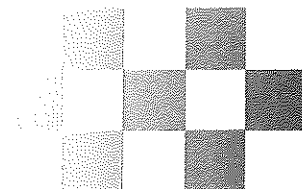
We are concerned that the level of personal investment CFS staff and volunteers have in the organisation may be overlooked. For the vast majority of us, working at CFS is a passion – demonstrated by the level of volunteering. We suggest that might be vastly different from the culture of a fully paid, highly unionised organisation such as the MFS. Accordingly, we are concerned how we retain the strengths of CFS in a hybrid organisation.

Given there is a current lack of clarity in many areas of the sector reform (particularly in fundamental areas such as the definition of operational functions) and an absence to date of a cost/benefit analysis

"CFS has good brand and reputation and is highly regarded and the work of CFS and its people is trusted by people in the Community.

Taking this from CFS and putting it into a "government department" is placing this advantage at risk of being diminished."

Comment from CFS Staff Survey, October 2014



of the proposed sector model (our professional instinct tells us it will be more costly to run) we are concerned that the extent of change management requirement may not have been considered. We cannot risk losing volunteers.

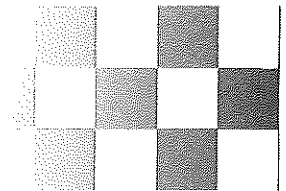
Accordingly, we strongly suggest a change management framework be developed as a priority including:

- Clarity about the direction of the sector and the new organisation
- A clear implementation timeframe
- Identification of an engagement strategy with organisational leaders
- Involvement and engagement of volunteers and staff to increase their support of and preparation for change
- A sustainable change program
- Mapping each organisation's business function
- Identification of the parameters for integration and the dependencies for progress.

It is also important to define and communicate the organisation's strategic directions, in areas such as:

- Key leadership roles
- Understanding of volunteerism
- Communications Plan
- Recognition of the structure being three-fold: operational, corporate and cultural
- Identification of stakeholders
- Training program to meet new skill requirements.

We suggest the Change@SouthAustralia model offers a strong framework for consideration. It describes itself as: "an innovative program designed to unlock the tremendous potential of the public sector workforce. The program focuses on achieving a set of values defined through consultation with public sector employees. The values in action are demonstrated through a series of 90 day change projects. Through this program, public sector employees will be empowered to create innovative and dynamic workplaces, and foster deeper, more productive relationships with the community and business." More information is available at: <http://change.sa.gov.au/>



4. Staff survey overview

About half CFS's paid staff participated in a Staff Survey earlier this month to identify trends and themes across the organisation in regards to the sector reform and specific the Discussion Paper. This was an excellent rate given the very short timeframes in which responses were required.

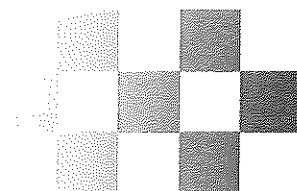
Key findings

- More than half of CFS staff agree that direct funding of ESOs creates inequity and isolation
- About 9 in 10 staff members believe there is inequity in the industrial relations and human resources principles and practices across the ESOs
- 81% of CFS staff believes the ESOs have introduced their own corporate support resources due to a reduction in SAFECOM service levels
- Staff were divided about whether they thought there is duplication across ESOs
- Three-quarters of staff agreed there are inconsistent service delivery standards across the ESOs
- 61% believe there is inconsistency in training across ESOs and 23% didn't know
- 68% of staff believed ESOs' community safety programs would benefit from a coordinated approach
- 94% of staff are concerned with the proposed changes, with one-third extremely concerned
- Generally, staff are less concerned about their jobs than they are concerned about the organisation [looking at the graded scale of *Extremely* to *Not at all concerned*]
- Generally, CFS staff do not think the proposed organisational structure provides clarity
- Almost half of CFS staff are not clear at all about where their job might fit, while the other half are 'somewhat' clear
- 57% of staff don't think the proposed model will work well, with another 34% thinking it will work moderately or slightly well
- 73% of staff felt the proposed changes would have little to no effect on improving community safety. About 18% felt it would have a moderate impact.
- The two clear benefits CFS staff felt the proposed structure would bring were better integration with other ESOs and less duplication of services
- 100% of staff believe if non-uniform staff no longer provided frontline support, service levels to the community would be impacted

The **3** things you need to hear

*We asked each CFS staff member to list the top three things they'd like you to hear during this process.
The top three themes which emerged were:*

1. Look after the volunteers, we need them
2. Respect the culture and 'brand' of CFS
3. The sector needs more resources more than it needs reform.



The survey was followed up with additional questions and asked for direct responses to the recently released possible sector model diagram.

Key findings – Strengths and weaknesses - Sector Model

Generally, CFS staff felt the potential strengths of the possible sector model were:

- Streamlined – better business governance and continuity
- Better integration
- Reduction in duplication
- Better distribution of finances/budgets
- Possibility of a better response
- Streamlined management structure.

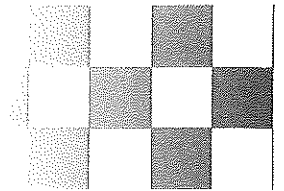
Generally, CFS staff felt the potential weaknesses of the possible sector model were:

- The cultural divide between United Firefighters Union and volunteers
- Lack of understanding of multifaceted, integrated roles performed by staff
- The shifting of functions out of operational streams (e.g. infrastructure and logistics, volunteer support)
- Lack of understanding about links between operations and public information / media / community education & engagement
- Isolation of volunteers
- Lack of acknowledgement about prevention work (statutory role)
- Lack of access to upper management for volunteers
- No detail about resourcing
- Some key areas not represented (intelligence, mapping)
- Doesn't show where people will sit
- Frontline support services are too remote from volunteers
- Doesn't appear to respect CFS culture – and looks like lots of little silos
- Suggests boundary changes will be based on admin structure not bushfire risk
- Too much focus on response not enough on prevention
- Lacks analysis of community risk and meeting community needs

Key findings – Strengths and weaknesses - Regional Operations model

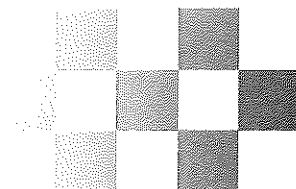
Generally, CFS staff felt the potential strengths of the proposed Regional Operations model were:

- Streamlined – better business governance and continuity
- Lack of duplication
- Combined management approach
- Model will require additional staff – more resources
- Additional support to regions



Generally, CFS staff felt the potential weaknesses of the proposed Regional Operations model were:

- The cultural divide between United Firefighters Union and volunteers
- Will not meet the T20 State Plan target for community preparedness
- Required resource levels for this model, which seems at odds of intent
- Lack of understanding about the functions everyone performs
- Regional Management may not fully understand the various frontline services reporting to them - e.g. lack of empathy for volunteers
- 11 regions is a major concern
- Boundaries based on administrative requirements not operational
- The maintenance of support with LGA seems to have been left out
- Lack of focus on prevention
- Varying cultural difference between the organisations particularly volunteer and paid unionised
- Volunteer support at regional level is missing
- It will fail if CFS volunteers lose connectivity at the regional level
- Removing bushfire management and prevention from the regions will remove the support that is provided to the fire prevention officers in the field
- Issue isn't structure it's resourcing
- More regional offices will need to be secured and Regional Co-ordination Centres established at significant cost
- Lack of understanding of how Community Engagement Role will report directly to Regional Management
- Lack of clarity about resourcing for major incidents



Conclusion

We thank the Minister for the opportunity to provide feedback on the Discussion Paper and the possible sector model. We agree there are benefits and opportunities stemming from the formal integration of the three ESOs. These primarily lie in ensuring consistency in operational standards, training, employment benefits and resource allocation, and in creating synergies in service delivery. Any initiative which increases community safety has merit.

Conversely, there is a great risk, by centralising and corporatising too much too quickly, that our key stakeholders – the volunteers and their communities – will be adversely impacted. This could result in an outcome opposite to the intent of the reform.

We urge once again the necessity for reaching an agreed definition of operational work across the sector and aligning the proposed sector model accordingly. The current model dilutes a great deal of the frontline support services CFS paid staff currently provide and does not recognise the operational work we do undertake, specifically in the area of community prevention and preparedness. We feel it also does not consider the proven merits of a regional approach in delivering certain support services.

Like you, we are committed to creating a safer community. We hope our key concerns outlined in this response are heard, considered and integrated into the reform process to ensure we can continue responding to community need.

