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Youth Advisory Council  
South Australian Country Fire Service  
GPO Box 2468  
ADELAIDE SA 5001

The Hon Tony Piccolo MP  
Minister for Emergency Services  
GPO Box 668  
ADELAIDE SA 5000

24 October 2014

Dear Minister,

I write to you on behalf of the South Australian Country Fire Service Youth Advisory Council in response to the *A Safer Community* discussion paper regarding the Emergency Service Sector Reform and the *Possible Sector Model* circulated following Roundtable three.

On page 22 of the Discussion Paper, you have outlined a general outline of how the new Sector will be structured:

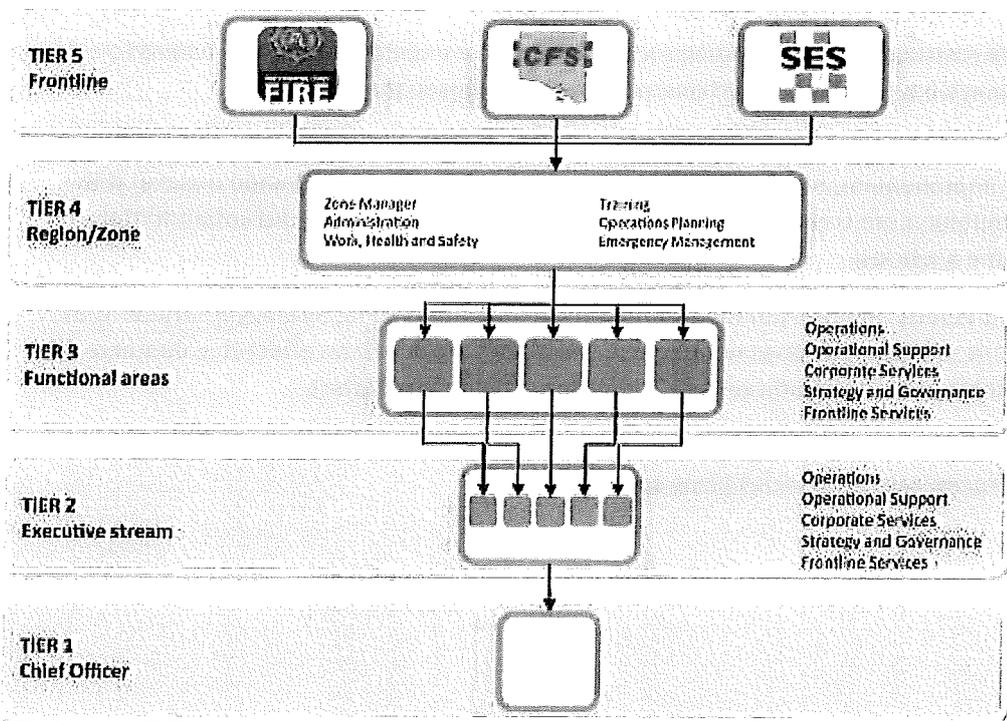
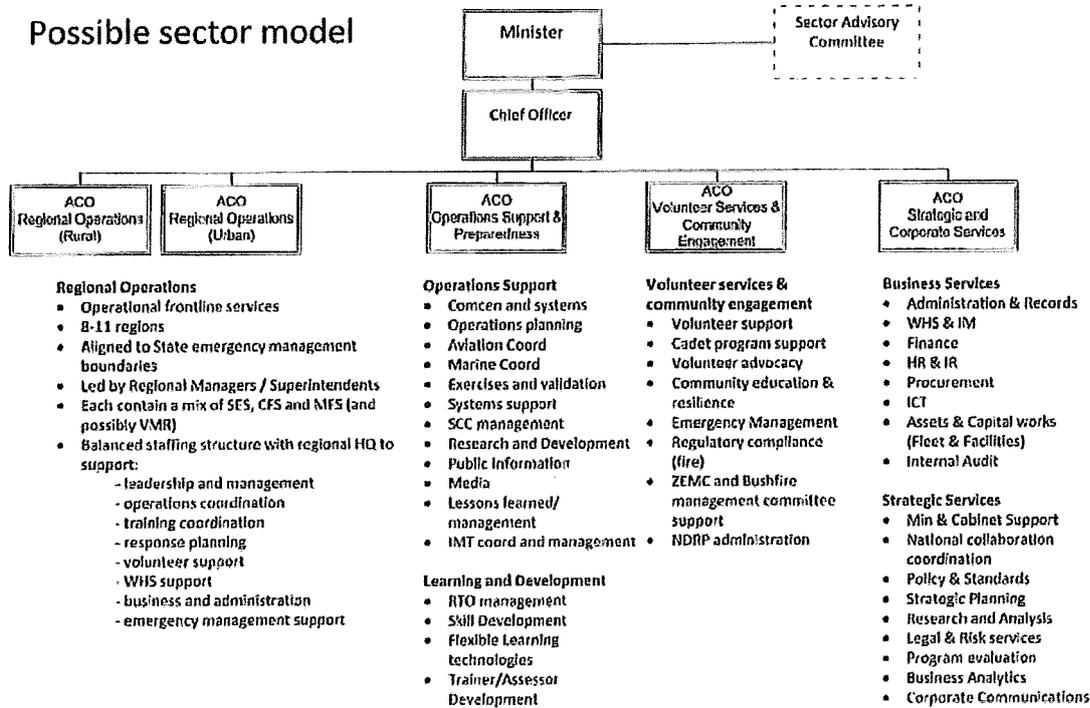


Figure 3: Proposed structure (overview)



This was further followed up by the *Possible Sector Model* circulated to the YAC via the Chief Officer of the CFS on Tuesday 14<sup>th</sup> October:

**Possible sector model**



This represents an entire restructure of the existing services. While we understand that the aims to create a more “flat” organisation, we have a number of concerns with the proposed model.

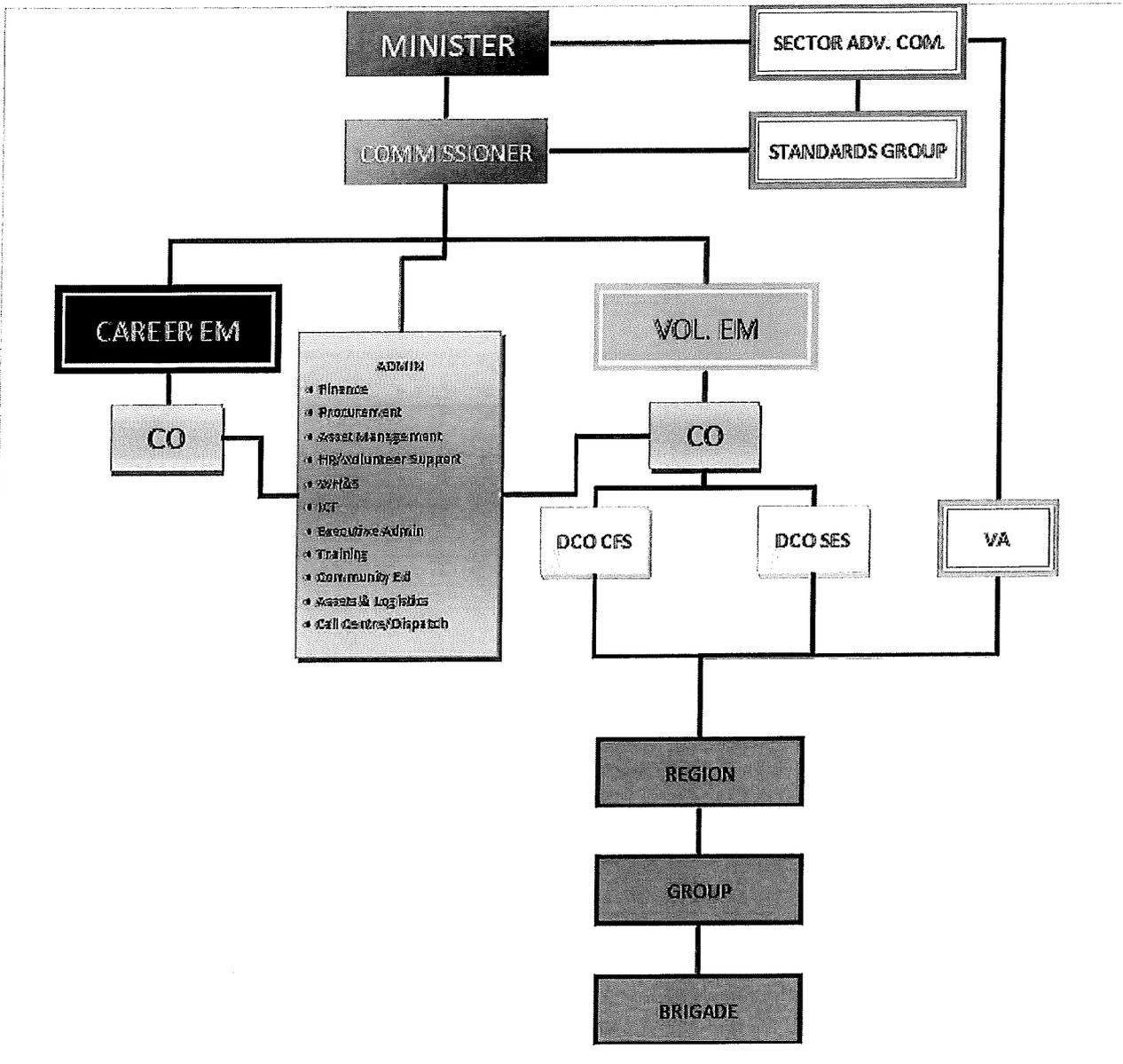
We believe that our model of emergency services has a number of strengths and generally works quite well. While there is room for improvement, we don’t believe that a complete restructure should occur at this time, without first attempting more conservative changes which will likely cause less disruption to the volunteers and staff of the agencies.

We are also concerned that despite the intentions not to disrupt volunteers (ie. by leaving Groups as they currently are in the CFS), a model which does not perform will likely have a flow on effect to volunteers in any case, specifically if there is major reform to the regional model (discussed later).

We therefore support a more measured reform in the first instance, which can be reassessed in the future should it not deliver the necessary efficiencies being sought.



For this reason, the YAC supports the following model being adopted:



Recommendation 1 of the *Holloway Review* recommended that the MFS, CFS and SES continue to operate as standalone agencies under a single Chief Executive. This model would meet that recommendation.

Recommendation 2 of the *Holloway Review* further recommended that an audit of the shared services of the emergency service agencies (SAFECOM) be conducted.



## SA Country Fire Service Youth Advisory Council

The Ernst & Young report *Independent review of shared services in the fire and emergency services sector* found that the following is the current state of service provision in the emergency services sector (page 17):

Function	SAFECOM	Local Agency	SSSA	Lead Agency	External Shared Services
Finance	✓		✓		
Procurement	✓				✓
Asset Management	✓				
Human Resources	✓				
Workplace Health & Safety	✓				
Information Management Services	✓				
Executive Administration	✓	✓			
Emergency Management	✓				
Volunteer Support	✓				
Training		✓			
Community Education		✓			
Assets and Logistics		✓			
Government Radio Network					✓
SA Computer Aided Dispatch System					✓
MFS call receipt and dispatch				✓	
DPTI Major projects					✓

The Ernst & Young Report recommended that Training, Community Education and Assets & Logistics could be amalgamated into a single administration unit. We recommend that this occurs, but also recommend that MFS call receipt and dispatch also be consolidated into the new administration body as it is a cross-agency function. We further recommend that the Administration Unit report directly to the Commissioner. The Commissioner's role would then be chiefly as an administrator of the emergency services and to implement policies which result in the best operational outcomes for the frontline.

While we support training functions being amalgamated into a central administrative unit, the YAC requests that continued delivery and development of national standard training occurs. We would not support a new training organisation which does not deliver national standard training. We also strongly support the continued development of volunteer trainers and would strongly oppose any policy which leads to inequality between volunteer and paid trainers in any new model.

We have adopted the above model from one created by the CFSVA on behalf of senior CFS volunteers. It is worth noting that we have opted to remove the shared administration unit between SES and CFS as we believe that this would lead to unnecessary duplication between the administrative units. The Ernst & Young Report recommended that a "Pay for service" model could be utilised to ensure that the agencies do not duplicate administration processes (similar to Shared Services), this is something which could be considered.



It is finally worth noting that any model will fail if it is subjected to similar cuts which SAFECOM underwent over the last several years.

The YAC believes the model above has the following advantages:

- It recognises the difference between volunteer and paid emergency services workers
- It encourages greater collaboration between the CFS and SES which would hopefully break down some of the walls between the agencies and reduce some of the examples of duplication
- It reduces the number of agency chiefs to two
- It creates a single Commissioner who replaces the SAFECOM board (recommendation 1 of the Holloway review)
- It could meet the savings recommendations of the Ernst & Young report.

The YAC strongly recommends this model is adopted. Further to this, we have summarised some of our concerns on the proposed model circulated by the Chief Officer previously:

### The Commission

In regard to the "Commission" level of the new proposed agency, we have the following concerns:

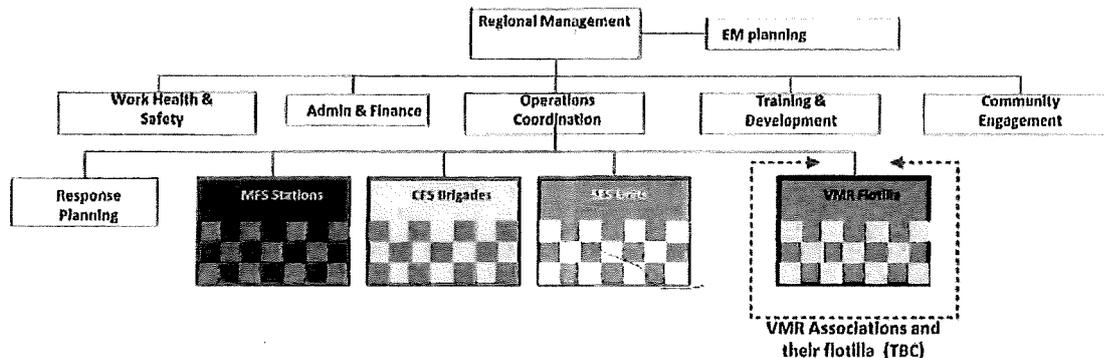
- The agency is broken into "Rural" and "Urban" operational units. These are not clearly defined, but presuming that Regions stay as they currently exist in the CFS, or increase as proposed in the possible model to 8 or 11, it is perceived that there will be one ACO "rural" responsible for all but one region with the other ACO "urban" being responsible for the remaining one - Adelaide. The alternative would be that both ACO's would be responsible for different operational aspects in each of the Regions requiring regions to report to two senior officers. This would not suit the emergency services which prefer a chain-of-command model for operations. One ACO responsible for all regions would be more effective than two.
- At the ACO level there are too few units or a deputy Chief Officer level would need to be introduced. The proposed model combines business units which are not complementary. Examples include Operations Support with media and public information. The Volunteer Services & Community Engagement ACO has responsibility for volunteer support, community education and emergency management. Community education should be kept with a general communications unit and emergency management should be a function under operations to separate a corporate function from an operational one as per the recommendation in the Ernst & Young Report. In short, this model looks messy with many units responsible for many roles rather than developing specialised responsibilities.
- The Ernst & Young Report recommended that volunteer support and HR are combined. We believe that some consideration could be given to a combined unit with some staff specialised in recruiting and supporting volunteers specifically and that these positions must be guaranteed. Conflict resolution is an example of where there is minimal difference between staff and volunteers and hence a consolidation could occur.



## The Regions

The proposed Regional Operations were also circulated by the Chief Officer of the CFS on 14<sup>th</sup> October:

### REGIONAL OPERATIONS



In regard to the “Regional” level of the new proposed agency, we have the following concerns:

- In this model “CFS Brigades” are referred to and directly connected to the Region. Clarification is needed as to whether this is simply a typo or whether CFS Groups would be abolished and brigades tied directly to the Regions.
- 8-11 regions are referred to in the possible sector model, further clarification on this is essential. The six existing CFS regions are geographically created for operational reasons. Any change to the regional level must only occur if it aligns with operationally sensible boundaries. “Emergency management boundaries” are referred to but it is unclear what these are as there are currently six CFS regions, two SES regions, four rural MFS regions and fifteen fire ban districts. All of these overlap. While we do not oppose an increase in the number of Regions if it leads to greater support for volunteers, the boundaries must make operational sense.
- The regional level’s only tie to the unit level is through operations coordination. The unit level should be connected through all of the functions of the Region as the units require support in all of those areas.
- It’s important that any structure is complimentary to AIIMS.

We thank you for allowing us the opportunity to comment on the proposed structure of a new Emergency Service Sector.