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Minister,

I present this brief paper in response to "A Safer Community Discussion Paper – September 2014"

The thoughts are in essence my own based on 42 years as a volunteer in the Country Fire Service and over 30 years as a General Manager

I have circulated a number of drafts of this to members of the Para Group and beyond and all the responses I have received have supported the position outlined below.

Whilst in principle I agree with the need for some reform of the Emergency Services Sector, I believe this to be only necessary at the Corporate/Executive level and not at the Operations level and not as extensive as the proposed model. Even so there are some areas of the proposed model that need to be further developed and reviewed if the reforms are to provide better outcomes for the Community and the Emergency Sector in general.

The amalgamation of any volunteer and career service is not easy and rarely successful from a volunteering perspective due to the significantly differing cultures and ethos' of the two. Inherently any such combination generally results in the disenfranchising of the volunteers due to the significant power a unionized work force can bring to bear on employers and governments to achieve their objectives. This in direct contrast to a group of volunteers, no matter how well organized, who have very different reasons for participating, are generally not as vocal, nor militant in their reaction to change and often either through reality or perception, just walk away and their services are lost to the Community.

This is certainly evidenced in comments from volunteers currently working out of co-located premises in SA whether it is with MFS or SAAS. I believe these comments were made during the consultation meetings but have not, however, been recognized in the report.

In recognizing these differences it is important to maintain the culture, ethos and identity of each service in any new model, therefore it is desirable, in my view, to still maintain some operational separation.

The model set out in the paper and released subsequent to the third Roundtable, seems to be essentially the same one that has been presented by you though out the whole process. This model is not supported in its current form.

People have also commented that the Discussion Paper does not seem to reflect many, if any, of the comments, concerns or suggestions reflected in any of the recommendations, which is somewhat surprising given the extensive consultation process.

The proposed model seems to strongly follow the current MFS structures creating immediate concerns from both CFS Staff and Volunteers around the effective management of the CFS, particularly operational matters currently undertaken by the CFS. Whilst it does separate operational functions from corporate responsibilities it should maintain the current operational structures of each service as they are.

In relation to the Operations of the 3 Services, it is my belief that they should fall under 3 ACO's. One each for CFS and MFS, and a third for SES/VMR. These would be responsible for the operational requirements of the CFS, MFS and SES/VMR as they currently exist. I believe this would better suit the needs of all services, maintain the relative cultural differences, and yet enable the combining of the "Corporate" functions that are duplicated across the different services currently.

The report identifies the dual roles of many Officers in each of the services especially in times of significant activity. Whilst this creates lean organizational structures this "duality of focus" should be kept to a minimum and managed differently.

The report recognizes that MFS use their rank structure to provide command at incidents and that the CFS has a process of selecting Incident Managers based on skills, experience and knowledge.

CFS Staff and Volunteers have significant experience in incident management of very large, dynamic and protracted incidents and the community should not lose access to this expertise in any restructuring of the sector. This is a proven process that works exceedingly well, as demonstrated last fire danger season with a number of complex fires being managed concurrently and in many cases prior to that.

The significant differences in operational requirements, especially in relation to Incident Management of the various services are not appropriately reflected in the reform paper other than being mentioned in Appendix 1 as a Guiding Principle.

It is my view that any people appointed to "corporate" roles in the new structure should relinquish any current rank, regardless of which service they come from. That is, in the proposed new structure, the Assistant Chief Officers, Volunteer Services and Community Engagement, Strategic and Corporate Services and Operations Support and Preparedness, should not be defined as ACO's. Although at the same substantive level they should be defined as Directors or General Managers and have no operational rank.

However, if people in these roles (or other corporate roles for that matter) are appropriately trained and experienced then they should not be excluded from being appointed to Incident Management roles in times of high activity and of course the ability of the organization to be able to release them from any corporate duties, however, they would not do this in any rank structure.

The proposal to change boundaries to match current government boundaries is not supported. This concept was mooted some years ago for the CFS and was not only considered to be unnecessary but would impose additional costs for no particular benefit. I believe the case against this is still valid. The CFS has an effective regionally based operation that should continue to be maintained. Changing this from 6 to 8, or up to 11 would involve significant additional cost in infrastructure alone and is completely unnecessary.

The CFS currently is the major service provider outside of the metropolitan area and as mentioned has an efficient Regional structure that covers the whole state. Any change to this structure is not supported. If there was any change it should be the SES and MFS Country Commands being incorporated into this current CFS Regional structure as it currently exists. Locations of these offices would continue to be determined as they are now based on operational needs, building availability etc.

This Regional structure should continue to focus on local operational capability, preparedness and planning, supported corporately as required, much as it is now. This is imperative due to the variety of terrain, risks and capability across the state. The Regional structure should also be given greater "corporate" support in relation to training and human resources matters such as recruitment, discipline and personnel management and financial management.

Another area identified in the report as an area requiring change, is that of Training. Not only should the training functions of all services be combined but the whole accreditation of Trainers and Assessors and recognition of training between the 3 services should be reviewed. Instructors should be selected on the basis of skills, qualifications and overall suitability and not on the basis of whether they are paid or volunteer and if someone is trained by one of the services why is that training not recognized by another?. This is part of the cultural change that will be required should any reform of this nature proceed.

A further significant cost to the Sector is having each Service accredited as a Registered Training Organization. Is it necessary for 3 RTO's and that said, do we in fact need to be RTO's? We are generally training people for our own operations and whilst being an RTO ensures some form of national consistency it also comes with significant red tape and cost. This consistency and appropriate curriculum development can also be gained in a less formal manner that will release these funds to provide greater resources for training delivery. In any case a review around the consolidation of the Emergency Services Training Function is highly desirable.

The Paper also identifies that cross service functions such as SACAD should become part of the corporate structure. This is critical and whilst there is a cost impact, the call receipt and dispatch centre should be setup in a separate location and not attached to any of the operational centres. It is a service provider to the three services and therefore fits well into the "Corporate" area. Operators should not be identified by the uniform of any particular service as they currently are.

The establishment of a Minister's Advisory Group is crucial not only through the initial phases of any reform process but as an ongoing direct link to the Minister and should be established as a matter of priority. Any such Group should include people from each service with appropriate skills, knowledge and understanding of the Emergency Services Sector both paid and voluntary.



Cc SACFSVA