



# Fire and Emergency Commanders Association NZ

SUBMISSION IN RESPONSE TO:

**BUILDING FIRE AND EMERGENCY NEW ZEALAND:**

- Additional and changed proposals for reconsultation

JULY 2020



## TABLE OF CONTENTS

<b>INTRODUCTION .....</b>	<b>1</b>
<b>EXECUTIVE SUMMARY .....</b>	<b>2</b>
Includes a summary of recommendations 1 – 16	
Includes a summary of additional relevant feedback	
<b>FEEDBACK ON NEW AND REVISED PROPOSALS .....</b>	<b>6</b>
FECA RESPONSE TO REVISED PROPOSAL 1.....	6
<i>Process to assess operational response leadership experience prior to shortlisting of applicants for District Manager and Group Manager positions</i>	
FECA RESPONSE TO REVISED PROPOSAL 2.....	11
<i>How redeployment decisions would be made for District Manager, Group Manager and Community Risk Manager positions</i>	
FECA RESPONSE TO REVISED PROPOSAL 3.....	14
<i>How redeployment decisions would be made for CRR and RR Senior/Advisor positions</i>	
FECA RESPONSE TO REVISED PROPOSAL 4.....	15
<i>Changes to the number and configuration of CRR and RR Management, Senior Advisor and Advisor positions</i>	
FECA RESPONSE TO REVISED PROPOSAL 5.....	17
<i>Reduction in the proposed size of the Risk Reduction Directorate Management team</i>	
<b>ADDITIONAL FEEDBACK .....</b>	<b>25</b>
Additional feedback to achieve the best efficiencies of the Tranche 2 structure .....	25
Including feedback relating to:	
The ongoing priority to develop the comprehensive Technical Competency Framework with partner agencies;	
Attracting our future leaders; and	
Support roles critical to the success of the structure.	

## REFERENCES



## Fire and Emergency Commanders Association NZ

Submission in response to

*Building Fire and Emergency New Zealand:*

*Additional and changed proposals for reconsultation*

### INTRODUCTION

---

The Fire and Emergency Commanders Association NZ (FECA) wishes to acknowledge FENZ for providing this opportunity to re-consult on aspects of the Tranche 2 recruitment.

We acknowledge that any consultation process takes time and money, but is our organisation's view that the enduring benefits of getting the right outcomes certainly outweigh these short-term costs.

Our submission was developed from a workshop and feedback from many FENZ senior managers.

Some themes emerged strongly and quickly from this feedback. We highlight them here as a priority and make clear recommendations.

A small portion of feedback is at variance. Nevertheless, we present these valid comments so they can be considered, and not lost.

Additional points to our submission include feedback that was not strictly within the re-consultation's scope, but

which we consider to be important for supporting the Tranche 2 structure.

We wish to emphasise that we continue to dispute aspects of the Position Impact Assessment (PIA) process used to get us to this point.

We also do not accept that an interim Confirmation of Relevant Experience (CORE) assessment process should be used in place of a comprehensive Technical Competency Framework (TCF). We look forward with high expectations to such a competency framework being developed as soon as possible. And we anticipate that FENZ will commit to a completion timeline comparable to its management of other important projects.

That said, what is important now is to move forward in the interests and wellbeing both of the public and of everyone in our organisation.

We trust our submission will help to build a fair, transparent organisational structure and an approach to rank that encourages wide-ranging support and participation.

**Roy Breeze on behalf of the FECA committee**

**President of the Fire and Emergency Commanders Association NZ**



## EXECUTIVE SUMMARY

Support needed for the Tranche 2 structure was the focus of the bulk of the feedback comments and workshop data we received in response to FENZ's additional and changed proposals for re-consultation.

Specifically, strong feedback was directed at the number of Volunteer Support Officers (VSO) or equivalent Brigade Support and Business Services Support (BSS) ratios.

We strongly recommend that this support be researched and in place by the start of Tranche 2 structure's stand-up. It is our

view that the success of the Tranche 2 structure depends on it.

We understand the intention of the Confirmation of Relevant Experience (CORE) assessment proposal is for it to be a first step in the process to filter applicants who do not have the required leadership experience in the command and control competencies needed for the rank positions. However, we feel it does not require enough proof of practical incident management experience at the level required. We recommend additional proof of competencies processes.

## SUMMARY OF RECOMMENDATIONS

### RECOMMENDATIONS IN RESPONSE TO REVISED PROPOSAL 1:

Process to assess operational response leadership experience prior to shortlisting of applicants for District Manager (DM) and Group Manager (GM).

1. That the Confirmation of Relevant Experience (CORE) assessment process requires, as the foundation competency, proof of relevant onsite command and control experience in a senior command position at strategic and tactical modes at moderate-to-severe incident(s).
2. That the examples in the CORE application require some brief description of the competencies demonstrated in the draft core criteria and related points allocation, not simply a 'yes' or 'no' answer alone.
3. That an operational scenario question be asked in the interview for DM and GM to help assess the person's level of command competency, including an ability to demonstrate thinking under pressure. This question would be included in the 'Technical knowledge' section under 'Critical Capabilities' to 'build evidence on the CORE assessment'.
4. That simulation/exercise experience alone (whether assessed or not) be regarded as insufficient for a score rating to confirm a person is competent for the interim rank required for the positions of District Manager, Group Manager, or an operational rank equivalent to these.



5. That 'Critical capabilities' for District Manager, Group Manager and Community Risk Manager positions include leadership capabilities which demonstrate knowledge of managing 'all risks' across the 4Rs related to a district's risks.

#### **RECOMMENDATIONS IN RESPONSE TO REVISED PROPOSAL 2:**

How redeployment decisions would be made for DM and GM and Community Risk Manager (CRM) positions.

6. We strongly recommend that all substantive Assistant Area Managers (AAMs) and two-year Acting AAMs should transition via an Expression of Interest (EOI) straight into Group Manager roles.
7. That the selection panel keeps in mind the need for skill balance on the district management teams so the best person for the role and district needs is chosen. It is not enough to select someone from the 'affected' pool who is simply rated 'suitable'.
8. For transparency, provide the process for how the built environment risks and the natural environment risks are determined for a District, and in determining the best person for the role.
9. That discussions are held as soon as possible for those wishing to be considered for voluntary redundancy to outline the parameters, process, and so that their story can be heard.
10. Allow some time between appointing the DM and offering the GM and CRM positions to suitable applicants. This will allow DMs an opportunity to provide some influence over the makeup of the district management team members with the RM. This would be restricted to the top qualifiers and more likely only be possible where there were multiple near-equal-scoring applicants.
11. That the technical knowledge required for DM, GM and CRM should also look for evidence of all-risks management related primarily to Section 11, and secondly to Section 12, of the Fire and Emergency New Zealand Act 2017.

#### **RECOMMENDATION IN RESPONSE TO REVISED PROPOSAL 3:**

How redeployment decisions would be made for Community Resilience and Recovery (CRR) Senior/Advisor positions.

12. No limit to the number of Senior Advisor roles  
(see *Proposal 4 Recommendations below*).



#### **RECOMMENDATIONS IN RESPONSE TO REVISED PROPOSAL 4:**

**Changes to the number and configuration of CRR, RR management, Senior Advisors and advisor positions.**

**13. That a combined Community Risk Manager (CRM) role be established in all districts, as proposed.**

**14. The Senior Advisor position is an indication of skill level, not managerial hierarchy.**

**15. That no limit is set for the number of Senior Advisor roles. FENZ should make every effort to make risk reduction/recovery a more attractive option for staff. This includes making it a path to move through the levels of risk reduction/community resilience to Community Risk Manager (CRM) and Group Manager (GM) and onwards.**

#### **RECOMMENDATION IN RESPONSE TO REVISED PROPOSAL 5:**

**Reduction in the proposed size of the Risk Reduction Directorate Management team.**

**16. That one position, the Risk Reduction and Investigations Manager, be established to cover both investigation and risk-reduction advisory services, as proposed, with the caveat that arguments for and against are considered in how the person is selected, developed and supported.**



## SUMMARY OF ADDITIONAL RELEVANT FEEDBACK

---

In addition to our submission on the five proposals, we provide three sections which outline matters that we feel are highly relevant to support the future success of the new structure.

### **Relevant matters to achieve the best efficiencies of the Tranche 2 structure**

- 1. The ongoing priority to develop the Technical Competency Framework with partner agencies.**

#### **RECOMMENDATION**

- a. That FENZ show the partner agencies a commitment by providing an approved project plan, costed, and with timelines showing the required starting and completion dates.**

- 2. Attracting our future leaders.**

#### **RECOMMENDATIONS**

- b. Make sure the pay and conditions for the leadership position are attractive.**
- c. Investigate how excess hours of the officers on appliances can be managed to reduce the overtime that takes their pay over that for leadership positions.**
- d. Provide the required resources to these positions (see below, critical support).**
- e. Work with the partner agencies to provide a mentor system to encourage future leaders.**

- 3. Support roles critical to the success of the structure.**

#### **RECOMMENDATION**

- f. That planning starts as soon as possible to have the required VSO and BSS in place with the stand-up of the District teams.**



# FEEDBACK ON NEW AND REVISED PROPOSALS

## FECA RESPONSE TO REVISED PROPOSAL 1:

PROCESS TO ASSESS OPERATIONAL RESPONSE LEADERSHIP EXPERIENCE PRIOR TO SHORTLISTING OF APPLICANTS FOR DISTRICT MANAGER (DM) AND GROUP MANAGER (GM).

### Feedback from members

All members who commented on this subject felt that the Confirmation of Relevant Experience (CORE) system, in its present form, was not suitable to be used as a selection process. Many had strong opinions about this subject.

In particular, they took issue with:

- The 'Yes/No' aspect of the questionnaire.
- How a candidate may not be required to have physical presence and an onsite incident example of their command experience.
- No confirmation required that a person's experience is indeed suitable or that they actually are competent.
- The absence of stated minimum qualifications and experience for referees.
- Acceptance of leadership experience in a tested simulation exercise (which, on its own is insufficient evidence).
- The potential for setting up people to fail.

### Key considerations factored into our recommendations were that:

- The primary purpose of the CORE process is to confirm relevant level of incident management experience in a senior operational leadership role

### onsite at a moderate-to-severe (or above) escalating incident/s.

- CORE is being proposed as an interim process to assess the relative level of competence at the rank for District Manager (DM) and Group Manager (GM). The role requires them to be on the senior officer call roster to respond to incidents to provide guidance or provide tactical and strategic level command at 'various **escalating emergency incidents.**' Onsite command experience can be only truly quantified by **physical onsite incident experience** and outcome.
- Command experience in Regional Coordination Centres (RCCs), National Coordination Centres (NCCs), Emergency Operations Centres (EOCs) etc are very valuable competencies for these roles particularly for the DM role, but they alone do not prove the foundation skill for these roles of strategic and tactical **onsite** command competency at emergency incidents.

### RECOMMENDATIONS 1 & 2

**That the Confirmation of Relevant Experience (CORE) assessment process requires, as the foundation competency, proof of relevant onsite command and control experience in a senior command position at strategic**





and tactical modes at moderate-to-severe incident(s).

That the examples in the CORE application require some brief description of the competencies demonstrated in the draft core criteria and related points allocation, not simply a 'yes' or 'no' answer alone.

The Association has concerns that the following statements have been made to supposedly strengthen the foundation Command and Control accountability liability and subsequent definition for proof of capability in any applicant's weightings for the ranked positions of District Managers (DM) and Group Managers (GM):

***"The revised proposal provides a higher level of assurance to Fire and Emergency NZ of the applicant's relevant level of incident leadership experience to fulfil the key operational response accountabilities required by District Manager and Group Manager positions.***

***"In this context 'relevant level of experience' is defined as having confirmed experience in a leadership role at a moderately severe incident (or above) at a national, regional or local-level response as defined by CIMS 3rd edition, 2019 (Please see Appendix 1a .....)"***

***- Building Fire and Emergency New Zealand: Additional and changed proposals for reconsultation, p6***

The use of these tables (Appendix 1a, p23) seems to be technically incorrect, out of context, and inconsistent with current

FENZ Policy and Command and Control doctrine.

Although we operate under the guiding principles of the Coordinated Incident Management System (CIMS) for multi-agency incidents, the Command and Control Technical Manual (CCTM) determines the FENZ requirements for incident control.

CIMS 3rd edition acknowledges this when lead agencies such as FENZ operate within their internal and legislative arrangements managing incidents of various complexity. For example, Incident-level responses may have from one or two personnel up to several hundred (CIMS 3rd edition, 2019, p24).

The coordination centre response example used is also inconsistent and is not an EOC as defined in CIMS 3rd edition but an RCC under FENZ doctrine.

***"The Coordination Centre for a local level response is an EOC, led by a Local Controller. The EOC links with the incident level ICPs and, when applicable, with their associated regional or national-level Coordination Centre."***

***- CIMS 3rd edition, p25***

It appears that the proposal document has mismatched this in an attempt to find neutral ground between urban and rural doctrine. We are concerned that this seems to offer a much wider net on what accurately defines required Command and Control skill sets against a more generic leadership/managerial view. Again, this seems contradictory to providing a higher level of assurance and accountability for ranked positions and their District accountability.



The 'Leadership Position' definition is fundamentally too broad. The skill sets, capability and accountability of an Incident Controller/Commander, Operations Commander or OIC Fire at a higher-level incident are significantly different from those of function managers such as Planning and Intel, Logistics, Recovery Manager, Risk/Legal Advisors or other such Incident Management Team (IMT) leadership roles.

Additionally, this equally applies to the operational function roles of Emergency Coordination Centre (ECC), Emergency Operations Centre (EOC) and Regional Coordination Centre (RCC).

The high level of assurance surely requires not only demonstrated incident leadership, but proven command capability and presence, as well as strategic thinking to influence complex incidents of moderate-to-severe nature (Local level L2 through to National level N4) and thus provide reassurance to FENZ and the community of an applicant's capability.

Moderately severe incidents are routinely managed from Incident Command Points (ICPs) within the Urban perspective with support from RCCs etc, as these incidents are time-poor, often complex in nature, and require significant cross-over between tactical and strategic command and control capability.

Rural Fire uses EOC functionality for longer-duration wildfires, which actually operate in a similar place to Urban ICPs as an example supported by RCC.

#### **Confirmation of Relevant Experience (CORE) assessment**

The use of an assessment supported/verified by referee checks is very subjective as to who can act as a referee, and what level of the organisation they come from. If we truly expect to establish genuine experience, then there should be set levels of referee with credible knowledge in what they are endorsing.

An example would be for DM and GM, where we would expect the level of referees to be National Commander or Assistant National Commander for DM and Area Commander for GM.

We are also concerned that we have had no oversight of the draft questionnaire for assessing candidates' Command and Control experience. Additionally, stating 'attended' does not determine if they were successful or competent at the level stated.

We think that this competency assessment process should be based on the paper that ANC Steve Turek led, being the 'Competency Assessment and ACL Accreditation' (28 August, 2017) presented to the Strategic Leadership Team (SLT) as the competencies for confirmation of relevant skills. This paper is based on UK and Australian competency frameworks and likely will form part of the literature review and mechanics of our future comprehensive competency framework.

We acknowledge that one of the aims of the proposed CORE assessment is to provide a filtering process for shortlisting for the ranked positions.

As stated earlier, we accept that this step is now needed in the absence of a comprehensive Technical Competency



Framework, and our intention is to support a process to move forward.

The proposed CORE process does not provide proof of an applicant's ability to think and act under pressure.

### RECOMMENDATION 3

**That an operational scenario question be asked in the DM and GM interviews to help assess a person's level of command competency, including an ability to demonstrate thinking under pressure. This question would be included in the 'Technical knowledge' section under 'Critical Capabilities' to 'build evidence on the CORE assessment'.**

### Simulation exercises as proof of experience

The paragraph which states that in the absence of real life examples candidates may use simulation or exercises (p6) is contradictory to the statement of FENZ's requirement of a higher level of assurance of an applicant's relevant incident leadership capability.

Research into the limitations of simulation is widely available. Our opinion is also informed by our Commanders, who have extensive experience in the current and past FENZ simulation tools such Vector and now XVR when conducting Senior Station Officer assessment and incident leadership and strategic/tactical command courses.

Research on models used to assess competency such as the Oxfordshire Fire & Rescue Service (OFRS), which was

discussed in *Introspect Model:*

*Competency Assessment in the Virtual World* (Lamb, Boosman, & Davies, 2015), has some synergies with our computer simulation (Vector/XVR), and OSM traffic light system. The computer platform (XVR) currently used by FENZ appears to have a more realistic nature with interactive graphics, however, this in no way provides the synergies, stress or variables of real life decision-making in time-critical strategic and tactical scenarios.

Historically, simulation systems have lacked interrogation of students' cognitive processes, strategic thinking, and decisions. This has resulted in flow-on tactical decision-making in the real world being unrealistic and potentially dangerous. Indeed, until recently, restricted simulation development meant that scenario development was limited to enabling rote-learned, tick-box approaches to be applied.

The Introspect assessment tool is worthy of mention as it has adopted the Naturalistic decision making (NDM) and Primed Recognition making discussion (RPD) models of rapid decision making within its scenario and assessment process as outlined in Klein (2008). Introspect's key success is that it incorporates a mixture of self-awareness and reflection within the debrief process to drill into why a commander made a particular decision given the limited amount of information presented. Lamb et al., state that this allows a commander to become metacognitive in their decision-making skills, in a process where they adapt one of their recognised processes to a particular incident.



It is plain to see when examining the research and expert opinions of qualitative subject matter that current simulation/table top exercises and the like have inherent faults. They rely heavily on the facilitator's skill and experience to establish and draw out proof of competency in command leadership and of management of any incident presented to individuals.

Simulation and exercises are not generally assessment-based and therefore should not provide a basis for proving incident leadership competency. Attendance at such non-real-life incidents scenario types is a low bar of evidence.

This could set up people to fail further.

It is important to acknowledge and emphasize that while we may accept that simulation experience can be useful, with certain limitations, to test the application of knowledge, it cannot be regarded as **evidence of experience**.

#### RECOMMENDATION 4

**That simulation/exercise experience alone (whether assessed or not) be regarded as insufficient for a score rating to confirm a person is competent for the interim rank required for the positions of District Manager, Group Manager, or an operational rank equivalent to these.**

#### **Operational command is not a standalone competency**

Command competency is integral part of the broader competencies required of emergency service leaders known as the Command, Leadership and Management (CLM).

- **Leadership** *is influencing, motivating and empowering people to achieve the organisation's purpose*
- **Management** *is the responsibility for planning, organising, and coordinating people and/or resources to meet organisational objectives*
- **Command** *is the legitimate authority, whether by rank, role or assignment to exercise direction of people and resources.*

The three components of CLM are interlinked. A DM and GM will use all three competencies in short and long-term decision making, across the 4Rs of 'all risks'. Expertise in operational command is one of the steps within the whole 4Rs process of risk mitigation. Having knowledge of the Reduction, Readiness for response and Recovery components of a risk or risks, makes a person more prepared for the Response to the risk.

#### RECOMMENDATION 5

**That 'Critical capabilities' for District Manager, Group Manager and Community Risk Manager positions include leadership capabilities which demonstrate knowledge of managing 'all risks' across the 4Rs related to a district's risks.**

We make further recommendations on the proposed 'Selection Criteria' in the next section, which relates to the how risks within the district are identified and proportioned.



## FECA RESPONSE TO REVISED PROPOSAL 2:

### HOW REDEPLOYMENT DECISIONS WOULD BE MADE FOR DISTRICT MANAGERS, GROUP MANAGERS AND COMMUNITY RISK MANAGER POSITIONS.

#### Fair and transparent selection process

As previously stated, FECA has disputed the Position Impact Assessment (PIA) process and thus the need for a selection process for some of the roles. The dispute is not fully resolved. Our comments below are based on the fact that, even if FENZ agreed with our position on the PIA, there still will be competitive environments and a need for a fair and transparent selection process.

#### RECOMMENDATION 6

**We strongly recommend that all substantive Assistant Area Managers (AAMs) and two-year Acting AAMs should transition via an Expression of Interest (EOI) straight into Group Manager roles.**

#### Feedback from members

The key points raised in our members' feedback were that it was important to:

- Establish a 'suitable' standard that does not set people up to fail
- Find a balance between redeploying suitable, affected people and appointing the best person for the role and district team skills required
- Define how District and Group 'risks' are assessed
- Clarify queries about the voluntary redundancy process
- Provide appointed District Commanders with some influence

over the selection of the district management team.

- Revise the Technical capabilities section, so the knowledge required is not Fire-only focused

#### Avoiding set-up-to-fail factors

We understand and agree with the legal and compassionate requirement to look after those with 'affected' status. We need, however, to be careful that we don't set people up to fail by putting them in positions where they might struggle to meet the demands of the role if they are just suitable.

There are many people who have acted at this level of leadership who do not have 'affected' status. We need to find a balance between where there are still vacancies in these leadership roles.

We should not just fill as many leadership vacancies as possible with those 'affected' staff who are only just considered as 'suitable' rather than appointing the best person for the role. There are still other roles for these 'affected' staff who don't make the DM or GM roles.

#### RECOMMENDATION 7

**That the selection panel keeps in mind the need for skill balance on the district management teams so the best person for the role and district needs is chosen. It is not enough to select someone from the 'affected' pool who is simply rated 'suitable'.**



## Defining risks

In selecting the best person for a position, we would like to understand how the risk assessment is done for a District and, specifically, the risks associated with the built environment versus those associated with the natural environment. For transparency, how will the risk proportion be translated into skills required and the proportion of responsibilities and outcomes they will be accountable for?

### RECOMMENDATION 8

**For transparency, provide the process for how the built environment risks and the natural environment risks are determined for a District, and in determining the best person for the role.**

## Voluntary redundancy

Where members would like to be considered for voluntary redundancy (**Scenario 5**, page 15), it has been suggested that they should not fill in a redeployment preference form which would then trigger a discussion with their manager. We feel these people should be given a date that this discussion will happen, so that if voluntary redundancy is not an option then suitable roles will still be available, not just those roles remaining after others have had an opportunity to fill them as per the option.

### RECOMMENDATION 9

**That discussions are held as soon as possible for those wishing to be considered for voluntary redundancy to outline the parameters, process and so that their story can be heard.**

## District Commander's input

The successful District Commander appointees need some input into their future District management team. We feel even with the concurrent selection process of the DMs, GMs and CRMs that the opportunity still exists for the appointed District Commander to have discussions with the Region manager to discuss the top candidates for GM and CRM appointments before deciding who is successful.

### RECOMMENDATION 10

**Allow some time between appointing the DM and offering the GM and CRM positions to suitable applicants. This will allow DMs an opportunity to provide some influence over the makeup of the district management team members with the RM. This would be restricted to the top qualifiers and more likely only be possible where there were multiple near-equal-scoring applicants.**

## Technical capabilities

In the Proposed Selection Criteria: Technical Knowledge (Appendix 2, page 29), it is proposed that the DM role requires "in-depth understanding of effective management of fire readiness,





response...” and that for the GM role “Evidence might include: Demonstration of key principles of effective fire readiness .....”.

This is heavily weighted towards fire only. Fire is our primary core function with responsibilities across all 4Rs but an intention of the Fire and Emergency New Zealand Act 2017 was to make us a leading ‘emergency’ service.

Where is there a requirement to show evidence that the applicant knows about all the other risks in the District such as:

- hazardous substances and entrapment that are main functions of FENZ, outlined in Section 11 of the FENZ Act?
- Or the future developing capabilities outlined as additional functions of FENZ in Section 12?

#### RECOMMENDATION 11

**That the technical knowledge required for DM, GM and CRM should also look for evidence of all-risks management related primarily to Section 11, and secondly to Section 12, of the Fire and Emergency New Zealand Act 2017.**



## FECA RESPONSE TO REVISED PROPOSAL 3:

### HOW REDEPLOYMENT DECISIONS WOULD BE MADE FOR CRR AND RR SENIOR/ADVISOR POSITIONS

#### Feedback from members

There was a moderate amount of feedback on this third proposal, and it appears that most members agree with it.

There was a lot of support for splitting the Fire Risk Management Officer (FRMO) role with the additional mandates of FENZ into the Risk Reduction (RR) and Community Readiness and Recovery (CRR) roles.

Members' comments also came with many suggestions, including the following:

- That there was lots of opportunity for more specialisation within these roles (e.g. hazardous substances, wildfire, rescue, all risks) and for there to be responsibilities across all 4Rs
- That the RR and CRR positions should have a set base of skills common to both
- It would be helpful to outline the many types of qualifications and skills these people will need to acquire/learn to meet the challenges of the future risk reduction and community resilience demands.

We will provide the Service Delivery Leadership Team (SDLT) with these suggestions to help develop these positions.

Limiting the number of Senior Advisor roles did present a disadvantage to existing FRMOs in the application process. Career-orientated staff members could not apply for the Senior Advisor roles in the first instance and it would be unlikely many senior roles would be left after all affected personnel have transitioned. This could have the effect of blocking a career path for many very qualified and experienced existing FRMOs.

Therefore, it is our recommendation not to limit the position numbers of Senior Advisors (see Proposal 4 section below).

#### RECOMMENDATION 12

**That there is no limit to the number of Senior Advisor roles**

*(see Proposal 4 Recommendations below).*





## FECA RESPONSE TO REVISED PROPOSAL 4:

### CHANGES TO NUMBER AND CONFIGURATIONS OF CRR AND RR MANAGEMENT SENIOR ADVISORS AND ADVISORS

#### Feedback from members

There was a small number of comments about the proposal of a combined Community Risk Manager, and all were in favour of the proposed role.

The specific number of Senior Advisor positions established at two per district received many comments. These ranged from agreeing with the proposed limit of two Senior Advisor positions per district, but with having several steps in the advisor roles, through to having no limit.

The common theme was the need for attraction to the role and a career path for staff. Most felt the title should recognise qualifications and skill rather than be focused on a management function.

#### Combined Community Risk Manager (CRM) position established in all districts

International discussion on the functions of Reduction and Recovery show clearly that these activities are closely intertwined and at times inseparable. Having a single lead advocate to provide advice coordination and direction within districts is sensible and avoids competing for resources and allows for prioritisation of effort.

The removal of the planned Recovery Manager positions should enable these positions to be added into key Risk Reduction areas that require better resourcing rather than being removed altogether.

#### RECOMMENDATION 13

**That a combined Community Risk Manager (CRM) role be established in all districts, as proposed.**

#### Specific number of Senior Advisor positions established

The proposal limits the career advancement of staff within risk reduction by limiting Senior Advisor roles.

To become a Senior Advisor, it is assumed staff will need to develop advanced skills and knowledge. It makes little sense to limit staff members from developing as skilled practitioners in this area.

Common transition into and out of risk reduction/recovery roles, staff turnover and retirements, secondments and the like will ensure that there will always be staff newly introduced into the roles and in the early stages of learning. Others who continue in this role, however, should be encouraged to develop expertise, and not limited by a cap of Senior Advisors in a given geographic location.

#### RECOMMENDATION 14

**The Senior Advisor position is an indication of skill level, not managerial hierarchy.**



### **Increasing pool of capable staff**

Acquiring high levels of proficiency, specialist skills and expertise in roles such as fire investigation and the built environment often takes many years. With small numbers of risk management staff in districts, it would be sensible to ensure that succession (when experienced staff are promoted, move on, or retire) means other staff members are well-equipped and developed to step into these roles.

Given the small number of risk reduction positions, compared with operational positions staff in a district which has its complement of Senior Advisors, progression will be limited. This would also increase the pool of highly-capable

staff who could potentially make excellent Community Risk Managers if allowed to progress through risk reduction. Preventing such staff members from attaining the Senior Advisor role will limit applicants.

#### **RECOMMENDATION 15**

**That no limit is set for the number of Senior Advisor roles. FENZ should make every effort to make risk reduction/recovery a more attractive option for staff. This includes making it a path to move through the levels of risk reduction/community resilience to Community Risk Manager (CRM) and Group Manager (GM) and onwards.**



## FECA RESPONSE TO REVISED PROPOSAL 5:

### REDUCTION IN THE PROPOSED SIZE OF THE RISK REDUCTION DIRECTORATE MANAGEMENT TEAM

#### Feedback from members

The specialist nature of this subject meant that though the quantity of feedback we received was small in volume, it was comprehensive in nature. Like sections 3 and 4 above, the feedback included rich information providing ideas on progression, qualification, size of role and specialisation within the Risk Reduction (RR) and Community Readiness and Recovery (CRR) roles.

Here, we highlight information directly relating to the proposal but we also will pass on the many good additional points and ideas to SDLT so that they can be included in the future development of the roles.

The proposal to combine the proposed Risk Reduction Advisory Manager and Fire Investigations Manager positions in NHQ into one role

There were conflicting opinions on the proposed combined position of Risk Reduction and Investigation Manager. We present both discussions below.

Our final recommendation supports the proposal to combine the roles but with considerations for the points below.

#### In support of the proposal

##### In support of the proposal, with the following caveats:

That the person in this role has the technical experience across both fields

(i.e. investigation; risk-reduction advisory services). The reason for this suggestion is that the current person above the position does not have any technical experience in either. So, if the Risk Reduction and Investigation Manager were purely a manager then there would be two management layers with no technical experience in a very technical field. This would make it very difficult for projects to proceed. Not only would one non-technical manager have to be persuaded that a proposed project was relevant and beneficial, but also their senior non-technical manager.

The importance and benefits of a technical project may not be fully articulated when non-technical people above are trying to promote it.

The criteria for the position should include operational experience, risk reduction experience, fire investigation experience and training experience.

#### Against the proposal

Against the proposal, unless the points below were considered:

- The proposal contends that significant components such as Community Programmes and Research of the current role have been removed.

##### Our member disagrees with this for the following reasons:



**Community Programmes** - The principal programme that was within the existing Manager Fire Investigation role from 2008 was to lead the Fire Awareness and Intervention Programme. This role was removed from the role of Manager of Fire Investigation by organisation leadership in 2017 and was made the role of one of the PAFRMs. It has not been part of the Manager Fire Investigation for almost three years. Reallocating the FAIP programme to another position does not affect the current Manager Fire Investigation role.

**Research** - Live fire research has been an integral part of the role of Manager Fire Investigation and the Fire Research and Investigation Unit for the past 12 years. Live fire research differs from the academic studies and literature reviews completed under the Contestable Research Fund. Live fire research requires appropriately skilled and knowledgeable staff to undertake the fire research burns safely while ensuring robust learnings are captured and documented. There's also often a requirement for very fast turnaround times for outcomes. This differs from the protracted processes used to manage the contestable research projects. Many examples from other fire services demonstrate that live fire research goes hand in hand with the role of fire investigation and naturally sits best connected to this role. Removing live fire research from this role would take us back more than a decade of advancement in informing effective risk reduction. **This function should remain under the auspices of the Fire Research and Investigation Unit.**

- The proposal contends "new accountabilities had been added, including leading vegetation and wildfire investigations and contractor management".

**Our member disagrees for the following reasons:**

The vast majority of all vegetation fire investigations are completed in SMS and the FRIU has had oversight of these incident reports for many years. Vegetation fire investigation is an established part of training in our current fire investigation training curriculum. To further support vegetation fire investigations, the Manager of Fire Investigation made this a requirement for TRENZ reporting tool that enabled analysis of vegetation fires to detect trends.

**Collecting data and reporting on vegetation fires is not an addition to this role.**

The FRIU has conducted out research on wildfire cause to assist with wildfire investigations and while investigations of most major wildfires were managed through the National Rural Fire Authority, the FRIU has peer reviewed wildfire reports completed by Specialist Fire Investigators. The Manager of Arson Reduction has been involved in addressing serial arson in vegetation fire in a number of locations across the country. **The existing role of Manager of Fire Investigation has been active in vegetation and wildfire investigations since the inception of the FRIU 10 years ago.**

Wildfire investigations do require a different skill set of knowledge from structural fire investigations, although



some existing Specialist Fire Investigators have achieved received training in both. **The current Manager of Fire Investigation has secured opportunities to attended advanced wildfire training for both our Specialist Fire Investigators and rural investigators in NZ and in Australia to advance both the investigation and analysis of these fires.**

Besides wildfire investigation, there's also other specific skill sets investigators can acquire such as investigations of explosions and transportation fires which also require different knowledge sets. The current Manager of Fire Investigation has coordinated access to training in these areas of fire investigation as well, to ensure this capability is developed within FENZ. **Adding wildfire expertise does not tangibly change the FI Manager's role.**

**Contractor management** – The current Manager of Fire Investigation and Arson Reduction has managed contractors for many years, regularly working with our Procurement team to maintain and renew contracts. For first 10 years, he managed Supervision contractors for FAIP practitioners and psychologists who provided expertise to the FAIP programme. Since 2012 he has also managed a contractual role to support the FRIU in peer reviewing fire investigation reports. While the specifics of the contracted role might vary, managing contractors has been a frequent part of his current and previous roles. **Managing contractors has been on going part of the role and does not tangibly change the role of Manager Fire Investigation.**

Additional resourcing has been requested frequently by the Manager Fire Investigation for the last 10 years. **Adding staff to the Fire Research and**

**Investigation Unit does not tangibly change the role of the Manager Fire Investigation.**

- The proposal suggests combining “the proposed Risk Reduction Advisory Manager and Fire Investigations Manager positions in NHQ into one role”.

**Our member disagrees for the following reasons:**

The position description of the existing role of Manager Fire Investigation and Arson Reduction states that the role was responsible for “providing comprehensive and professional advice to the National Director, Fire Risk Management and the Senior Management Team”. Key responsibilities included (but weren't limited to):

- carrying out fire trend analysis using internal and external data
- working with respective government agencies and industry groups to address identified fire trends
- supporting NZFS staff in technical matters regarding fire cause
- publishing and disseminating knowledge gained by the FRIU about fire cause and trends, fire safety systems and human behaviour in fires throughout the community
- stimulating and maintaining interest in fire safety by means of education and publicity through various communications media with an emphasis on the internet
- assisting other agencies to increase knowledge and understanding on issues surrounding fire investigation



- conducting research into fire cause to improve understanding of fire cause and hazards presented by fire.

Key relationships of the existing role of Manager of Fire Investigation include:

- Fire Region Managers/Commanders
- Director Operations and Training
- Government officials (local and central government)
- Regulatory/standard setting agencies
- Community groups and NGOs at a national level
- National Fire Risk Management Coordinating Group

These key functions and relationships in the current position description are evidential to both the scope of the current role and the level at which it was expected to sit in the organisation. **The role was clearly established to provide evidence led and informed risk reduction advice to the organisation and to lead fire prevention work, especially with regards to learning from fires. However, while the role has been significantly under-resourced for many years, it should not be confused with other senior functions and roles within Risk Reduction.**

The presentations and publishing of numerous documents about learnings we have identified from fires shows the role is well situated and has been effective in this area. Examples of learnings presented or published include:

- 29 *Heads Up* articles published on FENZ website and communicated to industry groups, associations and other networks

- 31 *Specialist Fire Investigator Updates* (approximately eight pages each including emerging fire trends, development within FENZ, learning from research and conferences, etc)
- multiple journal articles published relating to fire investigation outcomes
- presentations at many national and international conferences about learnings from fires.

**The role of Manager Fire Investigation desperately needs additional resourcing, rather than a name change or increased workload of other national risk reduction duties. The need has been, and continues to be, for additional resourcing to support this role.**

- “The Risk Reduction and Investigations Manager would be accountable for ensuring the development, implementation, maintenance and continuous improvement of risk-reduction and fire investigation policies, processes and reporting. The role would deliver this accountability through ensuring the effective leadership of the Risk Reduction and Investigations team and the robust management of resources, the development, implementation and monitoring of work programmes and the development and maintenance of relationships with key partners and stakeholders in ways that provide information and intelligence that can be used to ensure that service and support needs can be met.”

The scope being suggested for this new role is a cause for concern. It now not only largely covers the functions of the existing Manager Fire Investigation but extends to





an extensive range of issues related to risk reduction. This is unrealistic and unsustainable amount of workload and underestimates the breadth of work the proposed role would be responsible for, including:

- effective leadership of risk reduction and investigations team
- management of all risk reduction resources
- all risk reduction policies, process and reporting
- management of all development, implementation and monitoring of risk reduction work programme
- development and maintenance of all relationships with key risk reduction partners and stakeholders.

Previously, many of these functions were spread across other senior risk reduction staff. If one role were to oversee such a broad breadth of work, it would require multiple support roles to report to this role which has not been factored into this proposal. Our member would urge FENZ to consider the scoping work done by the Integration team assessing actual workloads and divide roles up into manageable and sustainable workloads using a quantified assessment methodology. **Combining these two quite different functional roles would result, again, in overtaxing and under-resourcing a single position.**

- Ensuring Risk Reduction activities are intelligence evidence-led and evidence-based

DCE Service Delivery Kerry Gregory stated the justification for disestablishing the current role of Manager Fire Investigation was “that FENZ wanted to move to get

greater alignment between specialists and combining the learning” and to “ensure Risk Reduction Activities are intelligence led and evidence based”.

There is a comprehensive list of outcomes over the past 12 years to provide strong evidence that the role of Manager Fire Investigation has been instrumental in ensuring NZFS/FENZ Risk Reduction Activities are intelligence-led and evidence-based. These have included but are not limited to:

- over 60 published documents about learning from fires
- successfully achieved a range of legislative reforms in fire safety law and regulations supported by fire incident data
- authoring and publishing learning in journal articles in multiple international and New Zealand based journals and magazines
- submission of multiple reports to senior management and risk reduction leaders regarding fire risks based on incident data and emerging trends
- invited speaker to present learning from fires at many NZ and overseas conferences
- multiple products that have been recalled or improved in design based on intelligence gathered by the FRIU from fire incident data and research
- initiated the development of TRENZ reporting and analysis tool to assist and support staff in Areas and Regions in fire trend detection
- leading many national fire prevention campaigns to address fire risk including reducing school fires by 50% over a sustained 10-year period (internationally recognised)



- maintaining strong partnership with many regulators, national industry groups, manufactures, retailers and importers in relation to addressing products identified as fire risks
- maintaining learning from fires on our internal and public websites
- being the initiator and sponsor of multiple contestable research projects and a range of other funded research to inform risk reduction within FENZ
- establishing and managing the Fire Research and Investigation Unit and the fire research site at Whenuapai Airbase for over 10 years.

Since its inception, the motto of the FRIU has been **‘Turning Loss into Learning’**. This practice has been a fundamental and core principle to all that has been achieved by the Manager Fire Investigation in the past 12 years. More could have been done in this space but for lack of resourcing and support, not the scope of the role. **The decision to disestablish cannot be justified for the reason of enabling risk reduction activities to be intelligence-led and evidence-based.**

➤ **Senior Specialist Fire Investigators**

“There was concern that the increase of three positions would be insufficient to ensure there was enough rural Senior Specialist Fire investigators nationwide. The decision has been made to create 3 SSFI positions in total (1 new). These positions are not Fire Investigators per se. Fire investigations can be carried out by a range of people, including the Officer in Charge at an incident or a Senior/Risk Reduction Advisor. These Senior Specialist Fire Investigators are responsible for

building the organisation’s capability to undertake fire investigations, not necessarily conducting them themselves. Investigations of vegetation or wildfires will continue to be undertaken in the current manner in the short term – either by outsourcing to external contract expertise, including international resources where required or by using existing capability within the organisation, predominantly sitting within DLT and the District Risk Reduction team.

The current approach to fire investigations sits across two teams, with two sets of processes. While some work has been undertaken to achieve alignment, a more strategic view of the function needs to be taken in light of the increasing risk we face with climate change, which impacts directly on wildfire. We need to better understand the wildfire investigation skillset and the complexity of managing contracting resources, that are used in wildfire investigation.

The National Manager Risk Reduction will undertake a review of the Fire Investigation team’s functions and activities within the 2020/21 financial year and consideration of whether more resourcing is needed in this area will be made then.”

Initially five additional Senior Specialist Fire Investigators were considered to be added to FENZ to support the Manager Fire Investigation, based on workload. This was then reduced to three. Now it is proposed to add one position and then review whether additional roles are needed.

This contrasts with comparable fire brigades such as the Melbourne Fire





Brigade (MFB) and Fire and Rescue New South Wales (FRNSW). See table below:

Fire Agency	Staff Supporting Managers Fire Investigation	Proposed by FENZ
Melbourne Fire Brigade	12	
Fire Rescue New South Wales	10	
FENZ	2	1 additional SSFI, and maybe 2 more

**Note:** Neither MFB or FRNSW conduct wildfire investigations nor do they manage evidence. FENZ FRIU is expecting to undertake both additional roles in the future, which should also receive appropriate resourcing in addition to extra staffing to cope with the current workload.

With considerable financial pressures on both the Government and FENZ, and a long history of our organisation not resourcing risk reduction adequately, our member has no confidence that additional new SSFI FTE would be made available to risk reduction once Tranche 2b has been implemented. **All three SSFI roles should be added now while resourcing is currently being allocated and further additional staff considered based on a factual quantitative assessment of actual workload.**

The proposal suggests the SSFI roles are national roles, therefore, they should not be linked to region as has been suggested in previous Integration publications. This

would limit selecting the best people for the job. The only exception would be basing a role in Auckland to manage the evidence and research area as per the detailed design document proposed by Integration for evidence management. **The SSFI role should not be regionally allocated unless a model of regional response is introduced and supported with adequate resourcing.**

- The proposal states “these positions are not Fire Investigators per se. Fire investigations can be carried out by a range of people, including the Officer in Charge at an incident or a Senior/Risk Reduction Advisor.”

However the FRIU has shown repeatedly the need for a national capacity to support regions at incident of high value, complexity or political significance. Regions have also sought the support of SSFI when there has been a lack of capability within the region has also been sought. **In the last year, the FRIU has responded eight times** to support or lead fire investigations at the request of regions; including the NZ International Convention Centre and the Tapu Te Ranga Marae fires, which attracted attendance by the Prime Minister and Deputy Prime Minister, respectively. The FRIU would have responded to more fires if we had the sufficient resourcing to allow this to occur. **All SSFI should be required to maintain a fire investigation and response capability.**

- The proposal states that “the current approach to fire investigations sits across two teams, with two sets of processes. While some work has been



undertaken to achieve alignment, a more strategic view of the function needs to be taken in light of the increasing risk we face with climate change, which impacts directly on wildfire. We need to better understand the wildfire investigation skillset and the complexity of managing contracting resources, that are used in wildfire investigation”.

Work has been completed on combining all fire investigation processes into a single policy (p3). This has been awaiting SDLT approval for two years. Wildfire investigation is well understood and practised in multiple fire agencies throughout Australasia, and it is difficult to accept that it is not well understood in New Zealand.

Our member believes it is fundamentally unfair to current staff to have to await further reviewing of fire investigation practices when the rest of the organisation risk reduction staff are moving to integration this year.

Completion of full fire reports has been significantly impacted by the integration work and FRMO workloads and declining FRMO numbers. Being evidence-led, a comparison of full fire investigation reports completed in the 2015/2016 year (prior to integration impact) shows full wildfire investigations were 6% of the total full fire investigation reports for the year. Of the 382 reports completed for

the year, 94% related to structures, transport and other urban related fires.

**Resourcing is urgently needed to support work addressing the vast majority of fires FENZ responds to. Adding a single SSFI is inadequate to meet current demands, without considering the additional work to be introduced.**

- The proposal states that “the National Manager Risk Reduction will undertake a review of the Fire Investigation team’s functions and activities within the 2020/21 financial year and consideration of whether more resourcing is needed in this area will be made then”.

**Having just added the largest increase in Risk Reduction staff in 30 years, we are not confident the organisation or the Government will have any appetite to be adding further staff after another review of fire investigation next year.**

#### RECOMMENDATION 16

**That one position, the Risk Reduction and Investigations Manager, be established to cover both investigation and risk-reduction advisory services, as proposed, with the caveat that the arguments for and against (outlined above) are considered in how the person is selected, developed and supported.**



## ADDITIONAL FEEDBACK

### TO ACHIEVE THE BEST EFFICIENCIES OF THE TRANCHE 2 STRUCTURE

#### The ongoing priority to develop the comprehensive Technical Competency Framework with partner agencies

We have high expectations that a comprehensive Technical Competency Framework (TCF) will be developed as soon possible with the partner agencies.

##### RECOMMENDATION A

That FENZ show the partner agencies a commitment by providing an approved project plan, costed, and with timelines showing the required starting and completion dates.

#### Attracting our future leaders

For a long time, FENZ and the NZFS have had the challenge of trying to attract the best people to the leadership positions. To do this we need to provide the best terms and conditions for the positions. Some of the key barriers for people to move to leadership positions appear to be:

- No decent pay step from truck to commander due to S/SO overtime availability
- Leadership roles are not seen as rewarding, and viewed as heavily administrative
- Perception of excessive workload with little support
- Not having a full understanding of what people in the roles do.

##### RECOMMENDATIONS B - E

Make sure the pay and conditions for the leadership position are attractive.

Investigate how excess hours of the officers on appliances can be managed to reduce the overtime that takes their pay over that for leadership positions.

Provide the required resources to these positions (see below, critical support).

Work with the partner agencies to provide a mentor system to encourage future leaders.

#### Support roles critical to the success of the structure

##### Feedback from members

By far the most common comment, and often the only comment, related to what Volunteer Support Officers (VSO) or equivalent will be in place on day one and into the future. This was closely followed with the same concern for the number of Business Services Support (BSS). Very strong opinions were voiced calling for the urgent need of making sure there were sufficient VSO positions and BSS in place at the start of the District stand-up. Some examples provided indicated ratios of 17 plus volunteer brigades per VSO.

##### RECOMMENDATION F

That planning starts as soon as possible to have the required VSO and BSS in place with the stand-up of the District teams.



## REFERENCES

---

- Department of the Prime Minister and Cabinet. (2019). *Coordinated Incident Management System (CIMS)* (3<sup>rd</sup> ed.). Wellington.
- Klein, G. A. (2008). Naturalistic Decision Making. *Human Factors*, 50(3), 456–460.
- Lamb, K., Boosman, M., & Davies, J. (2015, May 24-27). *Introspect Model: Competency Assessment in the Virtual World*. [Long Paper – Decision Support Systems]. Proceedings of the ISCRAM 2015 Conference, Kristiansand, Norway.
- Turek, S. (2017). *Competency Assessment and ACL Accreditation*. Presented to the Strategic Leadership Team (SLT), 28 August, 2017.