

Final Position Impact Assessments – Assistant Area Manager, Area Manager, Deputy Principal Rural Fire Officer, and Principal Rural Fire Officer.

Following our discussions on Thursday 9 April, where we agreed to review the preliminary position impact assessment and reach a final assessment outcome, we can advise that this action has now been completed.

The final position impact assessment for the above four roles, reviewed for differences between these current positions and the proposed two new positions of Group Manager and District Manager, will be provided separately.

Changes that have occurred between the preliminary assessments and this final assessment can be summarised as follows:

- The additional information provided by FECA and those accepted by FENZ regarding updates to the scope of the Assistant Area Manager and Area Manager roles has been reflected in the final assessments. Specifically this is the agreed information presented in the documents titled 'additional information to describe accountabilities that are not found in the current position description' for each position.
- The additional relevant information supplied by FECA in their 7 April submission, particularly their comments presented at Annex A of that submission, was carefully considered during the final assessment. This was to ensure FECA's position was clearly understood and given due consideration.
- The team conducting the final review was different to the team that conducted the preliminary assessment in September 2019. Having given regard to FECA's submissions as well as information exchanged through the consultation process (including the position descriptions for the proposed new roles and the September 2019 consultation proposal document) the team conducting the final assessment considered that the scope of accountabilities and responsibilities in the proposed new positions had not been adequately described in the preliminary PIAs. The final PIAs reflect a more thorough and detailed assessment of the scope of the proposed new positions.

Having now completed the final PIA assessments, the final outcome can be confirmed. This is that while some of the content of the assessment has changed, the conclusion that the proposed two new roles are significantly different to the four current positions proposed to be subsumed into these new positions remains unchanged. The key reasons for this are:

- One of the key issues raised by FECA is the view that Area Managers and Assistant Area Managers already undertake work in the natural / rural environment. On this basis FECA have indicated they don't believe this is as substantive a difference as FENZ has considered it to be, for these current positions compared to the proposed new positions. This issue was carefully considered during the final PIA, particularly as it is acknowledged by FENZ that areas do include rural districts. However, there is a substantial scope of work and duties currently included in the Rural Officer positions rather than the Assistant Area Manager or Area Manager positions, that is proposed to be subsumed into the new Group Manager and District Manager positions. That scope of work is currently within those rural positions because it requires the rural skills, knowledge, experience and partnerships with key

stakeholders that Rural Officers hold in order to deliver across the 4Rs in the rural setting. Examples of accountabilities that fall within this rural scope of work include:

- Rural fire control. This includes ensuring and monitoring the state of readiness for rural fire control. Managing and reporting on fire control expenditure and ensuring that the costs of wildfires are accurately captured for process and reporting. Monitoring fire danger levels and declaring fire season status in line with the legislative and fire plan policy requirements - working with stakeholders such as local territorial authorities, Iwi and fed farmers around the impact of when fire seasons are set. Ensuring appropriate contracts (eg Heavy machinery, Helicopters) are reviewed and resourcing available prior to fire seasons when undertaking fire planning.
 - Leading, managing and providing support to VRFF Controllers - ensuring that Volunteer Rural Fire Forces are operationally ready and appropriately supported to provide the fire and emergency service needs for their (rural) areas, and dealing with and resolving volunteer related issues or disputes as may be required. This includes maintaining a close working relationship and engagement with associations representing rural volunteers.
 - Managing relationships and working in partnership with rural stakeholders. This includes facilitating the co-ordination of rural fire control between our urban and rural resources within Fire and Emergency New Zealand, Department of Conservation (DOC), Forest Owners, NZ Defence and service supply contractors. This includes working/liasing with partners such as farmers and local Iwi on land management issues, risk planning and fire safety education/reduction activities. Supporting working relationships with Local Advisory Committees and District Land Management Forums. These roles will also lead the operational service agreement with DOC at a district level to ensure it is supported and delivered upon, maintain MOUs with forestry entities and ensure those relationships are strengthened and those MOUs supported and delivered. Relationship management will also entail an understanding of the capability and capacity of our partners to support International and National wildfire deployments. These are important rural aspects of these positions that will continue to develop under the new structure.
 - Rural risk reduction and readiness. This includes monitoring fire weather information ensuring that public notification processes are in place and operating, and that all incident command and control and operational personnel, and key stakeholders are aware of current and predicted fire danger. Leading and where appropriate delivering a reduction programme designed to reduce the likelihood of wildfires in the district, and providing guidance on the safe use of fire as a land management tool.
 - It is essential to the proposed new structure that the new District and Group Manager positions contain these rural accountabilities, and supporting skills, knowledge, experience, and existing partnerships, to effectively deliver across the 4Rs in both rural and urban settings
- The proposed restructuring subsumes four current positions into two proposed new positions. The combining of the duties of four roles into 2, in and of itself, comprises a significant change of more than 20%. The contrary view – that the new roles are not significantly different to one of the existing roles, immediately encounters the difficulty of **which** existing role? For example, accepting the argument that the role of District Manager is not significantly different to the role of AM, ignores that the new role would also include significant duties from the role of Principal Rural Fire Officer. It is our view that the combining of duties from more than one role creates a significantly different new role, and

that the change is significant. As is recorded on the back page of the January 2020 ETP – the guide we have been using is that a change of more than 20% is significant. We are bringing together 4 existing roles into two – those existing 4 roles are significantly different from one another. The combined new roles also reflect a significant change, given the new combination of combined duties.

- The two new positions are proposed to have a significant additional scope of work that does not exist in any of the four current roles within the current structure. This adds further to the degree of change. The additional scope of work is to be delivered through organisationally aligned work programmes spanning the 4Rs that require a substantial and different focus on community engagement and partnering with external agencies and entities. Community engagement and external partnering is expected to be a driving factor in shaping work programmes to appropriately reflect the nature and needs of each District's community and environment. It is also expected to be essential to the delivery of these work programmes and their intended outcomes. This is fundamentally different to the current approach of our people undertaking the majority of Service Delivery work conducted in each area directly themselves. This is not simply a change in emphasis – it is a fundamental shift in what these roles will do on the ground. Community engagement and partnering with external agencies will be critical aspects of the new roles, and this reflects a significant change in approach when contrasted to the exiting 4 roles.
- It is acknowledged that operational readiness, risk reduction and response are the focus of the current Assistant Area Manager and Area Manager positions. These functions will continue in the new structure, alongside the expanded focus of the role described above. There are not significant differences between the operational readiness, and response focuses between the current and proposed new structure, in the nature and scope of this operational readiness and response work that is undertaken, other than that accountability will no longer be divided at a managerial / commander level between roles focussed solely on either the rural or the urban environment. It is in no way a criticism of our Areas that one of the key reasons for the proposed restructure is FENZ recognised that in order to broaden this focus across the 4Rs it is necessary to change and increase how we resource each Region. The proposed introduction of new roles in Districts including the Group Manager and District Manager roles, are intended to support this change and expansion in focus.
- The District and Group roles will also hold collective accountabilities for the delivery of new functionality derived from our responsibilities under legislation. This includes new functions such as Compliance and enforcement as well as additional inspector powers, and fire hazard removal which was previously a Territorial authority responsibility.

Approaching the new roles on the basis that they represent a significant change in comparison to existing roles, also reflects a fair and balanced approach to the position holders of all of the four existing roles. We are required under legislation to be fair to all staff. The new roles are combining duties from these four different roles. Excluding some affected staff from consideration for the new roles by treating the changes as less than significant would not be fair to all of the affected staff.

Much of the FECA submission acknowledged differences between the Assistant Area Manager and Area Manager positions, and the Group Manager and District Manager positions. In particular it was acknowledged that the District Manager position was a significant step up from the Area Manager position. FECA submitted that these differences are trainable skills, and that Assistant Area Managers and Area Managers have already demonstrated their willingness and ability to adapt to

changes of this nature by upskilling – evidenced by the significant differences between these roles as described in the 2012 position descriptions and how they operate now.

FENZ agrees with FECA on this matter. Likewise, if the decision is made to proceed with the proposed changes, Principal Rural Fire Officers (and others if successful in their EOI) will also have the ability to undertake training to step up to the proposed new role of District Manager. Fire and Emergency must be fair to all affected staff. It is our expectation that the proposed new District Manager and Group Manager positions would be filled through an internal expression of interest and selection process that would result in Assistant Area Managers and Area Managers demonstrating their suitability for redeployment into these new positions, as well as other affected personnel. We also expect Principal Rural Fire Officers and some Deputy Principal Rural Fire Officers to be able to demonstrate their suitability for redeployment into these positions as well. There are 77 proposed Group Manager positions and 17 proposed District Manager positions in the new structure which reflects considerable opportunities for redeployment from this pool of ‘affected’ employees. There is also the opportunity for any of these employees to seek redeployment to the wider range of other positions that would exist within the new structure for those people who would prefer to explore those avenues.

The selection process and criteria being developed following consultation on the proposal is intended to ensure general suitability for these positions can be evidenced for redeployment, with an acknowledgement that some reasonable training/development needs may exist that FENZ would support. Where there is competition for new positions, from people with ‘affected’ status resulting from their current position having been disestablished, we would appoint the most suitable person for that position from the ‘affected’ people that have expressed an interest in it, based on outcomes from the selection process. It is our intention that the selection process and criteria we use to do this ensures we redeploy the most suitably qualified affected people we have from the current to the new structure, to support effective service delivery across all regions. We also must ensure our process and criteria delivers these outcomes in a robust and transparent manner. We are expecting to continue to discuss the selection process and criteria with you to ensure your view is considered and thank you for the points you raised in relation to this in your 7 April submission.