Emergency Management Victoria

The Fire Rescue Victoria Fire District Review Risk Assessment Methodology Discussion Paper Feedback

Feedback table – Specific pages/sections of methodology

Page #	Section/Heading	Feedback	
4	1.1 Reform of Victoria's fire services	There are five priorities. Add fifth priority: Priority 5: Ensure the future sustainability of the fire services.	
7	3.2 How will changes to the FRV fire district boundaries be decided?	We note section 4J (1) of the <i>Fire Rescue Victoria Act 1958</i> (FRV Act) outlines the object and procedures relating to a review of the FRV fire district.	
		It would be helpful if the discussion at 3.2 could have a greater explanation of this section. For example, this current paragraph doesn't include a point about the CAoV, which is noted in section 4J (1) of the FRV Act.	
7	3.2 How will changes to the FRV fire district boundaries be decided	As a general comment, section 4K of the FRV Act sets out the procedure that needs to be followed if there is a change in fire risk. It would be helpful if 3.2 included a discussion about the situation that is envisaged by section 4K.	
7	3.2 How will changes to the FRV fire district boundaries be decided	Consultation requirements on the Panel. Would be valuable to identify specific points in the review process where consultation will take place, as risk is assessment is undertaken. This will ensure panel interpretation of data and information is accurate and informed by subject matter experts from the fire services and other organisations.	
7	4.1 Timeframe for change	It should be noted that any changes to Fire Districts, whereby the result is more resources or a new agency (e.g. FRV) introduced into an area where they did not previous operate, an assessment of the Emergency Services radio networks' capacity will be required, with a potential increase in capacity required of that network in the area prior to the implementation to ensure the ESO's can continue to safely operate.	





Page #	Section/Heading	Feedback
8/9	4.3 Assessment of Risk	States "as fire is the Panel's primary focus, fire models will be developed first" however other parts of the paper talk to reviewing other hazards as well
		- Suggest a clear definition of incident types in this document to ensure no ambiguity.
		- Needs to be clear if other hazards (incident types) are being included or not.
8/9 & 12	4.3 Assessment of Risk	Additional datasets could/should be examined in the "Elements" (Appendix B)
		 Ensure including Fire Service Communications Controller (FSCC) incidents in the relevant area – they may not be dispatched to the local brigade as per current assignment rules as FRV and CFA have different dispatch rules.
		 Example: CFA don't dispatch brigade to powerlines down, the CFA FSCC is notified. FRV dispatch a primary resources code 1.
		- Type of resources dispatched to the incident.
		- Type of resources required at incident.
		- Size of the incident.
		- Outcome of the incident.
		 If this is not taken into account, it could bias a change.
8/9	4.3 Assessment of Risk	If other hazards are included, a review of other agency events may be appropriate to review as well. Example: cardiac arrests for AV, where there is currently no EMR response. It may also be advantageous to review FFMVic fire incidents in any review area as well.
8/9	4.3 Assessment of Risk	In assessing risk, the differing purposes of each of the fire agencies (FRV – Structural Fires, CFA – Bush and Grass fires) should be factored into the methodology. It is not simply an increase of incidents, but the type and nature of the fire type and what each of the agencies are equipped and have the capability to respond to.
8/9	4.3 Assessment of Risk	The inclusion of temporal dynamics of risk elements would significantly enhance understanding of risk and the methodology. This includes across the day (such as day / night populations), weekday, weekend and across the year (such as variation of fire types due to seasons e.g. summer/winter).





Page #	Section/Heading	Feedback
8/9	4.3 Assessment of Risk	In determining the incident type, further clarity should be provided on where this data is sourced as often incidents are initially reported as one, however end up being another incident.
		 Example: smoke in distance might be reported as Undefined Fire, however once resources on scene could be an Aircraft Accident.
		Therefore, propose that the Incident Type used, is the FIRS (Fire Incident Report System) actual incident type, rather than the initial report incident type determined by the Call Taker based on the initial 000 call.
10	4.4 Adjustment of the FRV fire district boundaries according to risk analysis Text: Accessibility involves two elements: regional availability and regional proximity. Regional availability means the ratio of supply to demand for each demand location (the physical location where	 From the Structured Session, FDRP stated: They are still in the process of working out weighting factors. It would be valuable if the methodology provided these weightings They have performance criteria for agencies that need to be incorporated. This should be included/described in methodology.



\Χ	

Page #	Section/Heading	Feedback
11	Appendix A: Theoretical risk overview	The paper or methodology does not reference use of, or being informed by, existing risk standards. Methodology should consider the National Emergency Risk Assessment Guidelines (2020). This is a nationally consistent method (supported by COAG) for undertaking emergency risk assessments. Excludes assessment of emergency operational response risks but is meant to be complementary to other processes. Aligns with international and Australian risk management standard AS ISO 31000:2018 Risk management - Guidelines (ISO 31000:2018).
13	Figure B2	The chart (and methodology) is silent on the 12-month period for the CFA Chief Officer to respond. Where and how is this factored into the methodology/process.
		- Does any mitigations provided by the CFA CO need to be in place or can they be planned?
		- If CFA's proposed mitigations are acceptable, is the recommendation considered met, or does this then trigger another review/assessment based on the mitigation?
		- How will the Panel assess the the Chief Officer's advice on the capacity of volunteer brigades to respond effectively to a change in fire risk?
		- How will the Panel assess FRV's capacity to respond to the change in risk?
		How and where are these described/incorporated into in the methodology.



Feedback table – General comments on methodology

Feedback

Question – is it possible that the FDRP may decrease an FRV area at all, if the risk profile has changed/lowered? Or is it only an increase? The documentation doesn't highlight/comment on this.

Comment – FRV and CFA continue to have varying dispatch rules for the same incident type.

Example: vehicle into a building (not trapped) – CFA send single brigade/resource, code 3 (normal travel restrictions). FRV send Pumper and Rescue code 1 (Lights and Siren).

When examining new areas, the differences in dispatch rules should be examined as there will be a significant increase in resources dispatched.

Comment – it would be useful for the methodology to outline process for CFA response following fire district change recommendation.

Comment – different response time rules will impact on the data outcome based on each agency's procedures. Methodology needs to account and equalize these differences.

Comment - methodology is silent on time period for future risk.

Comment – how does the methodology address the time period between a recommended change in boundary and the provision of new station build, appliances staffing. The risk may change over that period given the lead times required.

Comment - methodology is silent on baseline/starting criteria for current risk. Is there an upper/lower point of Risk that creates a change threshold?

Comment – does the methodology incorporate cost of change in boundary compared to the cost of risk e.g. cost benefit of change in district. Upgrade of volunteer response, compared to new FRV station and associated resources.

Comment – the factors being considered to determine capability and capacity should be outlined in the methodology - standards, KPIs etc.

Comment – pre 1 July 2020 historical data will need to consider responses outside the former Metropolitan Fire District would all be classified as CFA and will need deeper analysis to determine if career/volunteer responses.

Comment – include a reference to the qualitative information gained from public surveys.

Comment - methodology should include clarity around weighting of different fire types (residential/risk to life higher weighting).

Comment - section 4J(2) of the FRV Act specifies that the Panel must have regard to any change in fire risk in the FRV fire district or the CAoV, in conducting its review. It would be helpful if this consideration was included in the paper.

