



**Centre of Full Employment and Equity**

**A Consideration of Merging TasFire Training with Learning and Development**

**Report prepared for the United Firefighters Union, Tasmania Branch**

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## Abbreviations

ABS	Australian Bureau of Statistics
AAD	Australian Antarctic Division
CofFEE	Centre of Full Employment and Equity
ERT	Emergency Response Team
SFC	State Fire Commission
TFS	Tasmania Fire Service
UFU	United Firefighters Union

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## Executive Summary

TasFire Training has operated as the commercial training arm of the Tasmania Fire Service (TFS) since 1992. Due to reduced funding in the 2011-12 Budget the TFS has been considering the closure of TasFire Training which could be expected to save around \$200,000 per annum. TasFire Training has synergies with other sections of the TFS:

- Learning and Development that delivers training to career and volunteer firefighters; and
- The Community Education Unit that delivers fire safety programs to the community including the School Fire Education Program, the Juvenile Fire Lighter Intervention Program; and Project Wake Up!

This report examines the possibility of merging TasFire Training with Learning and Development and expanding its role in Community Education.

### The contribution of TasFire Training and the consequences of closure

The economic and social benefits of training provided by TasFire Training include a general increase in fire awareness in the community, a reduction in the risk of fire and the ability to respond appropriately to fire incidents. The unique contribution of TasFire Training and the consequences of closing TasFire Training can be summarised as:

- Training directly contributes to the State Fire Commission's goal of assisting the community manage fire risks and respond appropriately when threatened by fire. TasFire Training provides subsidised training at workplaces where employers face funding constraints. Based on data for the first half of 2011-12 the annual value of subsidies for the current financial year will be over \$27,000.
- TasFire Training is well positioned to make a substantial contribution to improving fire safety for disadvantaged groups by expanding its role to include programs such as the *Project Wake Up!* transition, the School Fire Education Program, the Juvenile Fire Lighter Intervention Program and social marketing campaigns.

The TFS is committed to supporting the *Project Wake Up!* transition that involves community care organisations assuming responsibility for home fire safety assessments and remediation for vulnerable groups. The preferred option for the transition, identified in 2010, was for TasFire Training to provide training to staff of community care organisations.

TasFire Training developed and commenced delivery of training but this has been discontinued due to uncertainty over the future of the organisation. The closure of TasFire Training would require the TFS to provide support to community organisations by seconding operational staff to conduct the transitional training. This involves significant risks that have been specified as: (1) a longer transition period that would involve additional expenses and exposure to legal risk for TFS; (2) a risk that the transition of responsibility to the community care sector may fail if expectations of TFS support were not met; and (3) all other options for delivering transitional support (Options 2, 3 and 4) involve additional risks regarding quality, consistency, timeliness and cost' (Killalea, 2011: 2).

- TasFire Training delivers Emergency Response Team (ERT) training for high risk industries, such as mining and manufacturing that need to maintain employee safety, protect plant and equipment and respond to incidents that occur on site. ERTs undertake emergency procedures including evacuation and fire suppression at the

early stages of a fire and are able to work alongside Tasmania Fire Service Brigades. High risk industries that have ERTs trained by TasFire Training are frequently in isolated areas where brigade response times are extremely slow due to the distance from fire stations. In this situation having an effective ERT is critical to minimising the potential for loss of life and the extent of economic loss.

The need to source ERT training elsewhere (possibly interstate), if TasFire training closed, is likely to reduce the amount of training undertaken due to increased costs and reduced flexibility for employers. The Tasmania Fire Service and the Tasmanian economy would incur greater costs if brigades encountered fires that were more severe due to later detection.

- TasFire Training is currently the only training provider in the state for the Australian Antarctic Division (AAD). In addition to the commercial value of this training, it makes a valuable contribution to the Tasmanian Government's objective of establishing Tasmania as a gateway to the Antarctic. Additional economic benefits for Tasmania include the resupply of ships and consumption expenditure in retail and hospitality while the training is being delivered. The current trend towards increased Antarctic activity offers opportunities for TasFire Training to expand these training programs.

If Tasfire Training ceased operating, AAD training may need to be sourced interstate which would undermine the Tasmanian Government's objective of establishing Tasmania as the gateway to the Antarctic and reduce economic activity in the state.

- Although operating as a separate entity, TasFire Training remains an integral part of the TFS. TasFire Training provides the Tasmania Fire Service with a reserve firefighting capacity that can be utilised for operational duties as required. TasFire Training staff also provide information to industry regarding General Fire Regulations and Workplace laws on behalf of the TFS. The closure of TasFire Training would eliminate this reserve firefighting capacity, while the advice and information role for industry would need to be performed by other TFS staff.

### **Merging TasFire Training and Learning and Development**

An alternative to the closure of TasFire Training is to merge it with Learning and Development, while expanding its contribution to Community Education. In this way TasFire Training could continue to deliver its current suite of training programs, engage in firefighter training and community education. Learning and Development and TasFire Training provide similar training packages and staff have similar qualifications and competencies. The two sections utilise the same TFS training facilities.

The merger of the two sections would provide a range of opportunities for the TFS:

- Retention of TasFire Training in the merged entity would provide both economic and social benefits to Tasmania as outlined above. Retention of commercial courses would maintain competition in the industry. Continuation of courses where TasFire Training is the sole provider (AAD and ERT) would prevent disruption to industry.
- TasFire Training would be able to expand its community education role by providing training to community organisations that provide services to vulnerable people to enable these organisations to assess fire safety risks in the home and organise remediation (*Project Wake Up!* transition).

- While the closure of TasFire Training would result in some cost savings for the TFS, there are a range of costs that currently result in the adverse financial outcomes for TasFire Training that would not be reduced.
- The cessation of TasFire Training courses would result in an inefficient outcome - an undersupply of training services. The merger with Learning and Development would address this inefficient outcome.
- The merger of the TasFire Training and Learning and Development would provide a pool of trainers to facilitate more flexibility in training delivery. TasFire Training personnel could be used to provide training to firefighters in periods when commercial courses were not scheduled. This would enable the TFS to increase the quantum of training to career and volunteer firefighters, thereby increasing overall skill levels and ensuring higher levels of OH&S for TFS staff. This wider training role would increase the variety of work for trainers.

The process of merging the two sections would need to address a number of issues and would also provide an opportunity for a thorough review that could include:

- Development of the structure of the new entity, revision of management responsibilities, reporting lines and duty statements;
- Review of staff competencies and qualifications and implementation of a staff training and development plan to meet operational needs and provide opportunities for staff;
- Review of commercial operations including the content and range of courses offered. A strategy of increasing the range of courses over time could commence with the restoration of courses that were previously offered such as *Confined Space* and *Working at Heights* training. A program for the introduction of new courses could include consideration of courses offered by competitors or interstate public sector organisations that are similar to TasFire Training; and
- Competitive neutrality principles would apply to the commercial activities. These principles require that commercial operations of public sector entities do not derive a net competitive advantage due to their status as part of the public sector. Systems would need to be established to apportion costs to the commercial and non-commercial activities of the unit. The diversification of duties for TasFire Training staff to include delivery of training to TFS staff and community education training would reduce internal charges which would make commercial activities more cost effective. If TasFire Training revenue was equal to or in excess of avoidable costs it would not impose any costs on non-commercial activities.

The merger of TasFire Training with Learning and Development and the expansion of TasFire Training's role in community education would deliver considerable benefits to Tasmania and the TFS. The economic and social contribution of TasFire Training would be maintained and could be expanded over time. The TFS would maintain access to the reserve operational capacity of TasFire Training staff. The availability of additional trainers would provide greater flexibility in the provision of firefighter training and an opportunity to provide more training to increase the competencies of firefighters and the ability of the TFS to deliver a safer working environment.

## 1 Introduction

The State Government reduced revenue to the Tasmania Fire Service (TFS) in the 2011-12 Budget. As a consequence of the funding reduction, the (TFS) raised the possibility of closing TasFire Training to save around \$200,000 per annum. The closure of TasFire Training would have a number of adverse consequences: (1) it would significantly reduce competition in the training market; (2) it would reduce the range of courses available to employers because TasFire Training is currently the sole provider of some courses; (3) it would eliminate a reserve workforce for the TFS to draw upon for operations where necessary; and (4) it would reduce community awareness of fire safety and knowledge of appropriate responses to fire incidents.

The United Firefighters Union commissioned the Centre of Full Employment and Equity (CofFEE) to investigate the possibility of merging TasFire Training with Learning and Development and an expanded role in community education in the event that TasFire Training ceases operation as a separate entity. The TasFire Training and Learning and Development staff have similar competencies and skill sets. A merger would enable TasFire Training to continue to deliver courses that make a valuable economic and social contribution to Tasmania, while providing an opportunity for the TFS to use training resources more flexibly and increase the quantum of training to career and volunteer firefighters.

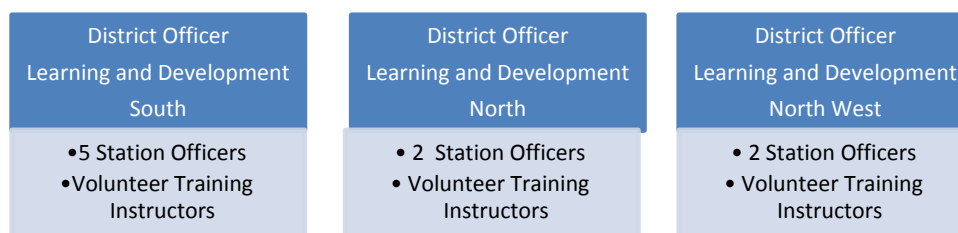
The report is organised as follows. The current functions of Learning and Development and TasFire Training are outlined in the following two sections. Section 4 details the unique contribution of TasFire Training to the economy and the community. Section 5 explores the benefits of the proposal to merge Learning and Development and TasFire Training and flags some of the issues that would need to be addressed prior to amalgamation. Concluding remarks follow.

## 2 Learning and Development

Training for career and volunteer firefighters occurs on-station, in local venues and at TFS's hot-fire training facilities at Cambridge in the South, Youngtown (Launceston) in the North and Three Mile Line (Burnie) in the North West. All TFS firefighters complete nationally recognised training from the Public Safety Training Package.

Training is provided by Learning and Development staff in each region. The organisational structure for Learning and Development is shown in Figure 1. Each region has a District Officer and a number of Station Officers or Training Officers. The District Officers manage firefighter training for their region. The Senior Station Officer in each region manages volunteer training instructors, provides training to volunteers and reviews volunteer training packages. The other Station Officers and Volunteer Training Instructors provide training to career and volunteer firefighters.

Figure 1 Structure of Learning and Development



Source: TFS Organisational Structure, November 2011

There are significant differences in the training courses completed and competence levels of career and volunteer firefighters. Training for career firefighters (see Table 1) includes:

- A 12 week recruit course consisting of: urban, industrial and rural fire suppression, hazardous materials, driving, first aid, workplace communication and the role of the firefighter in the TFS;
- Firefighters can progress to become qualified Senior Firefighters through on and off the job training using a competency-based framework; and
- Further learning, development and mentoring opportunities assist firefighters to progress within the TFS.

In addition to firefighting skills, career firefighters are also required to undertake Community Fire Safety programs and perform public information roles, including the roles of information officer, media management and community liaison.

Training for volunteer firefighters is based on the Volunteer Firefighter Skills Matrix which includes a set of identified skills required for firefighters to perform their job role. Training includes:

- Brigade induction; Volunteer Brigade Basics; structure/mobile property firefighting; bush firefighting; pump operation; urban firefighting; breathing apparatus; first aid; driving; and operating chainsaws;
- While career firefighters complete all aspects of a comprehensive training package, volunteer brigades are composed of members who have completed a variety of the training courses offered by the TFS. As a consequence, volunteers may be restricted in the functions they can perform at fire locations. A high proportion of volunteer firefighters complete core training, such as: induction, basics, pump operations, urban and bush firefighting. However, a significantly lower proportion of volunteers complete other training such as breathing apparatus, first aid, advanced urban and bush firefighting and other courses; and
- A small proportion of volunteers are classified as retained volunteers who receive some remuneration for turning out but are trained at the level of volunteers and do not have any additional level of responsibility at incidents than non-retained volunteers.

Retained volunteer and volunteer firefighters are not trained to respond to the following types of incidents (UFU, 2009):

- HAZMAT incident
- Road accident rescue
- Urban search and rescue incident
- Trench rescue
- High angle rescue incident
- Confined space rescue
- Ship fire
- Aviation incidents, or
- Major gas storage facility and major bulk fuel stores.



Table 1 Training programs for career firefighters

Training Program	Competency
Recruit Firefighter Development Program	<ul style="list-style-type: none"> <li>Prevent injury</li> <li>Follow defined occupational health and safety policies and procedures</li> <li>Operate breathing apparatus open circuit</li> <li>Prepare, maintain and test response equipment</li> <li>Provide emergency care</li> <li>Manage injuries at emergency incident</li> <li>Administer oxygen in an emergency situation</li> <li>Operate communications systems and equipment</li> <li>Work in a team</li> <li>Work effectively in a public safety organisation</li> <li>Work autonomously</li> </ul>
Firefighter Development Program Stage One	<ul style="list-style-type: none"> <li>Check installed fire safety systems</li> <li>Respond to urban fire</li> <li>Respond to wildfire fire</li> <li>Protect and preserve incident scene</li> <li>Participate in a rescue operation</li> <li>Communicate in the workplace</li> <li>Employ personal protection at a hazardous materials incident</li> </ul>
Firefighter Development Program Stage Two	<ul style="list-style-type: none"> <li>Drive vehicles under operational conditions</li> <li>Operate pumps</li> <li>Maintain safety at an incident scene</li> <li>Navigate in urban and rural environments</li> <li>Participate in community safety activities</li> <li>Undertake road accident rescue</li> <li>Trim and cross cut felled trees</li> <li>Work safely around aircraft</li> </ul>
Firefighter Development Program Stage Three	<ul style="list-style-type: none"> <li>Suppress wildfire</li> <li>Suppress urban fire</li> <li>Undertake confined space rescue</li> <li>Monitor hazardous atmospheres</li> <li>Operate aerial and/or specialist appliance</li> </ul>

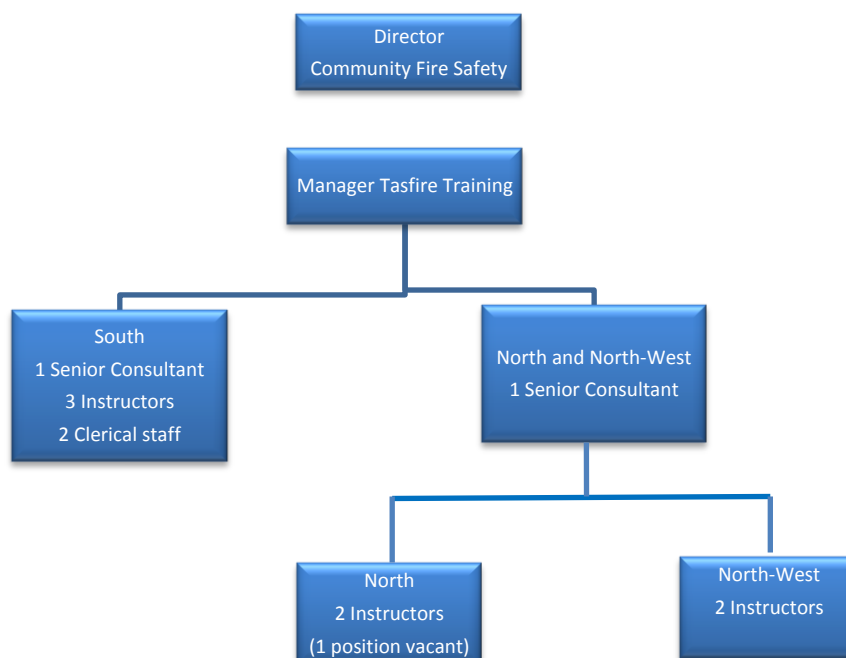
Source: TFS Operational Paypoint Schedule

### 3 TasFire Training

Since its formation in 1992, TasFire Training has operated as a commercial venture of the TFS that is required to recover costs and is subject to competitive neutrality principles. TasFire Training delivers training in all aspects of fire prevention, fire safety and emergency response to improve workplace safety throughout Tasmania (TFS, 2011). TasFire Training is part of the Community Fire Safety Division and operates from three TFS training centres: Cambridge in the South, Youngtown in the North and Burnie in the North-West.

Figure 2 shows the organisational structure of TasFire Training. There is a manager with overall responsibility for the three centres. In the South there is a Senior Consultant, 3 Instructors and 2 Administrative staff. Another Senior Consultant is responsible for both the North and North-West. There is one Instructor in the North and Two in the North-West.

Figure 2 Structure of TasFire Training



All TasFire Training instructors have strong backgrounds within the firefighting industry as career and volunteer firefighters who have had exposure to a wide variety of emergency incidents.

Training is provided to a range of industries: State and Federal Government agencies; health care, including hospitals and aged care; mining; manufacturing; hospitality; and community organisations, including child care centres, women's shelters and other non-government organisations. Current training courses are detailed in Table 2 below. Emergency Response Team (ERT) training is customised to the needs of individual employers.

Table 2 TasFire Training Courses

Course	Components	Duration	Price (\$)
Emergency Response Teams (for high risk industries)	Hazardous material incidents First response to fire incidents Fire control and emergency rescue Operating breathing apparatus and firefighting pumps		
Fire extinguisher	Identification of portable firefighting equipment Safe use of portable firefighting equipment Practical experience in extinguishing live fires	1 hour	90
Wardens	Roles and responsibilities of wardens Preparing for emergencies Evacuation procedures Communicating in emergencies	4 hours	210
Chief Wardens	Roles and responsibilities of chief wardens Acts and regulations relating to the Emergency Control Organisation Managing evacuations Responding to emergencies Liaising with emergency services Strategies in emergency prevention management Communications systems Recovery planning	8 hours	310
Breathing apparatus	Conduct pre-donning checks and tests on breathing apparatus Start up and control procedures Operate breathing apparatus Closing down and maintaining equipment	4 hours	210
Fire safety and Extinguisher	Prevent fires in the workplace What to do if fire occurs in the workplace Safe use of portable firefighting equipment Practical experience in extinguishing live fires	2.5 hours	120
Fire safety	Common causes of fires in the workplace How to prevent fires in the workplace What to do if a fire occurs in the workplace Identifying portable firefighting equipment	2 hours	50

Source: TasFire Training: [http://www.tasfiretraining.com.au/training.html#p7APMt1\\_4](http://www.tasfiretraining.com.au/training.html#p7APMt1_4).

## **4 The unique contribution of TasFire Training**

TasFire Training contributes economic and social benefits to the people of Tasmania by increasing the levels of fire safety awareness and emergency response skills in the workplace, with the additional benefit that these participants utilise this knowledge to improve safety in their households and the wider community (TFS, 2011).

The benefits of training provided by TasFire Training include:

- A general increase in fire awareness in the community, a reduction in the risk of fire and the ability to respond appropriately in the event that a fire occurs;
- Reduced economic and social cost of fire, including:
  - Reduced financial costs of fire damage;
  - Less disruption to business if people who have undertaken training are able to implement the strategies they have learned to minimise damage to business premises; and
  - Reduced disruption and social welfare costs by reductions in loss of life, injury and damage to residences

### **4.1 Emergency Response Team (ERT) Training**

Emergency Response Team training is aimed at high risk industries that need to maintain employee safety, protect plant and equipment and respond to incidents that occur on site. Industries such as the mining and manufacturing sectors use emergency response teams as an effective response to emergency incidents. Onsite teams are trained to respond to incidents that threaten both human and physical resources. This training enables employees to initiate preventative procedures/actions, inclusive of evacuation and fire suppression at the early stages of a fire or other emergency.

There are currently no other training providers in Tasmania providing ERT training. TasFire Training is uniquely placed to provide this since some instructors have an operational firefighting background and are able to base training on their knowledge of TFS operating procedures so that ERTs are able to provide a response that is well coordinated with responding TFS firefighters.

The importance of effective ERTs cannot be overstated. High risk industries that have ERTs trained by TasFire Training are frequently in isolated areas where brigade response times are extremely slow due to the distance from fire stations. In this situation having an effective ERT is critical to minimising the potential for injury, loss of life and the extent of economic loss. The economic flow-on effects to the Tasmanian economy of this function are substantial. The cost of repairs to buildings, plant and equipment are far lower, the period of disruption to employment is reduced and the cost of welfare provision for those affected is lower than would otherwise be the case.

### **4.2 Training for the Australian Antarctic Division (AAD)**

In 2010 TasFire Training won the tender for AAD training and is currently the only training provider in Tasmania capable of providing this training. TasFire Training provides training to AAD staff at four locations. In addition to the standard 7 day training package other courses such as portable fire extinguisher, extinguisher maintenance, breathing apparatus, rescue extraction and Voyager support have been provided. Training to the AAD generates revenues averaging \$100,000 per annum

In addition to the commercial value of this training, it makes a valuable contribution to the Tasmanian Government objective of establishing Tasmania as a gateway to the Antarctic. The recently released *Developing Tasmania's Antarctic Sector: A vibrant industry in a global market*, states:

The Antarctic sector is an integral part of Tasmanian society and history which is making a significant contribution to the Tasmanian economy. Further developing that resource has the potential to convert it into a major Tasmanian industry with very substantial long term economic and social benefits for Tasmania (Department of Economic Development, Tourism and the Arts, 2011: 4).

The sector's flow-on benefits for Tasmania are largely associated with the investment by entities involved in scientific research, cultural activities, education (including training) and governance matters (Department of Economic Development, Tourism and the Arts, 2011: 5).

The report has identified initiatives and associated actions required to fully capitalise on these opportunities. Initiatives include:

- Build Tasmania's capacity and reputation as a centre for Antarctic skills development and education and promote Antarctic careers;
- Comprehensively brand and promote Tasmanian polar capabilities;
- Raise awareness of Hobart as an Antarctic gateway;
- Maximise opportunities for Tasmanian businesses arising from the replacement of Antarctic vessels by international Antarctic organisations;
- Leverage existing Tasmanian maritime and polar capability to win additional business with other polar nations; and
- Attract additional East Antarctic nations to Hobart.
- Ships berth in Tasmania and take on supplies while crew members undertake training provided by TasFire Training. In the absence of this training there is a possibility that ships may continue to combine the training and provisioning functions, but do so at another location such as Melbourne. In this case, the associated expenditure in retail and hospitality that currently boosts consumption expenditure in Tasmania would be lost.

#### 4.3 Community benefits

TasFire Training directly contributes to the SFC's goal of assisting the community manage fire risks and respond appropriately when threatened by fire. TasFire Training provides subsidised training at workplaces where employers face funding constraints that mean they would not be able to fund a sufficient quantity of training at market rates. Based on data for the first half of 2011-12 the annual value of subsidies for the current financial year will be over \$27,000.

TasFire Training's community activities could be expanded through participation in *Project Wake Up!* that has the potential to reduce the risk of fire for vulnerable groups that are over represented in Tasmania. In the past the program has been restricted to aged care clients but there is a need to extend it to other groups that could include people with disabilities and other, e.g. family day care providers living in isolated areas.

The *Project Wake Up Situational Analysis* (TFS, 2010) demonstrated serious deficiencies in past performance due to reliance on delivery by career and volunteer firefighters. Program performance was superior in career brigade areas than in volunteer areas despite the proven

greater risks in rural and regional areas. Delivery of the program was expensive in career areas where four firefighters and an appliance were required to be on site due to the necessity to be available to respond to incidents. Moreover, only around 2 per cent of the target group were serviced by *Project Wake Up!*

Any attempt to substantially expand the program in its current format would be constrained by rapidly accelerating costs and staffing constraints. Responsibility for fire safety assessments is being transferred to aged care and disability organisations.

The *Project Wake Up!* Situational Analysis recommended that the TFS (2010: 7):

Identify, build and maintain relationships with partner agencies in health, aged care and disability service sectors state-wide; and explore opportunities for collaboration in improving client safety.

A draft Options Paper (Killalea, 2011) on the transitional support arrangements for *Project Wake Up!* identified 6 options:

- Option 1: *PWU* transitional training to community care organisations is delivered by TFT as a Community Service Obligation (CSO).
- Option 2: *PWU* transitional training to community care organisations is delivered by one or more firefighters (LFF or above) seconded from the Operations Division to the Community Education Unit for this purpose.
- Option 3: *PWU* transitional training to community care organisations is delivered by Operations Division firefighters on shift.
- Option 4: *PWU* transitional training to community care organisations is delivered by Operations Division firefighters as paid overtime.
- Option 5: The Chief Officer's decision of December 2010 that 'Home fire safety is [to be] incorporated into existing community care services *with TFS support*' is reversed. TFS continues to deliver *PWU* in its current form.
- Option 6: The Chief Officer's decision of December 2010 that 'Home fire safety is [to be] incorporated into existing community care services *with TFS support*' is reversed. TFS ceases delivering *PWU* in its current form without providing any additional support to agencies.

Option 1 was selected as the preferred option in 2010 and transitional arrangements provided for a period of two years for the transition of responsibility for client home fire safety to community care agencies with TFS support (Killalea, 2011). After Option 1 was identified as preferred option – TasFire Training providing training to the community care sector- it was heavily promoted by the Community Development Officer to the community care sector.

TasFire Training has developed courses to train staff from aged care and disability organisations to conduct comprehensive assessments of client needs and organise installation of essential fire safety equipment. This would increase coverage substantially thereby improving safety for disadvantaged groups. It would also deliver substantial savings to the TFS, which currently spends approximately \$300,000 per annum on *Project Wake Up!* and this expenditure would increase substantially if there was greater take-up of the program.

There is also scope to extend TasFire Training's role to include community education programs such as *Project Wake Up!*, the School Fire Education Program, the Juvenile Fire Lighter Intervention Program and social marketing campaigns are delivered by the

Community Education Unit. This expanded community education role could be maintained if TasFire Training merged with Learning and Development.

Training provided by TasFire Training also provides general social benefits through increasing the awareness of trainees who are better prepared to assess fire risks and respond appropriately. These skills should be highly valued in a community such as Tasmania that has a higher risk profile than other states and has a significantly higher incidence of structure fires. While the community benefit provided by TasFire Training is significant, the SFC notes that 'To date the indirect benefit to the Commission and the community has not been measured' (SFC, 2011: 3).

#### 4.4 Contribution to Tasmania Fire Service operations

Although operating as a separate entity, TasFire Training remains an integral part of the TFS. Some staff maintain operational competencies and are available to perform operational duties when required. In 2010-11, four TasFire Training staff were required to perform operational duties during times of bushfire for a total of 280 hours which was equivalent to \$15,850 in salary costs. Two staff from the South recently completed two weeks at Hobart Fire Brigade prepping for potential assistance. Last summer staff from the South completed some Air Operations support for a total of seven weeks, with the four staff members involved completing two days training prior to deployment. This deployment will occur again this year for a period of up to ten weeks. Staff have also assisted in suppression of fires threatening Hobart.

In addition to availability for operational firefighting duties, TasFire Training staff make a significant contribution to industry in the form of information provided on behalf of the TFS regarding a broad understanding of General Fire Regulations and Workplace laws and their statutory obligations. This includes providing advice and assistance with regard to evacuation procedures, interpretation and application of legislation and standards. Examples provided by TasFire Training staff include:

- Providing employers with advice on how to interpret the confined space definitions and understand the requirements that must be met under AS2865 when an area is defined as a confined space. Further advice has included tailoring work practices to focus on conducting risk assessments for work to be performed in situations where many of the factors associated with confined spaces are present, even if it is not technically classified as a confined space;
- Advising employers of the information and contact numbers that should be included in the Emergency Procedure Manual;
- Providing comments and suggestions on the content of evacuation plans including when to call the fire service, undertake fire suppression and the like as well as including plans to cover bomb threats, dealing with suspicious mail items and hazardous material spills; and.
- Advising on how to establish firm specific procedures for rescue in case of emergencies, including documenting the procedures and training staff

## **5 Potential benefits of merging TasFire Training with Learning and Development**

Learning and Development and TasFire Training provide similar training packages and staff have similar qualifications and competencies. In the case of Learning and Development training is provided to TFS members; both career and volunteer firefighters. On the other hand, TasFire Training clients are from outside the TFS, from the public, private and community sectors. The two sections utilise the same TFS training facilities.

The merger of the two sections would provide a range of opportunities for the TFS. The retention of TasFire Training in the merged entity would provide both economic and social benefits to Tasmania.

The merger would facilitate the retention of commercial courses offered by TasFire Training, resulting in a greater degree of competition in the Tasmanian training market. As mentioned previously, TasFire Training is currently the sole provider of Emergency Response Team (ERT) training and training for the Australian Antarctic Division (AAD). Removal of these courses would result in considerable disruption for employers who would need to source the training elsewhere, perhaps from interstate firms. The economic and social benefits that accrue from TasFire Training activities are discussed in more detail in Cook, Quirk and Mitchell (2012).

The application of competitive neutrality principles require that commercial operations of public sector entities do not derive a net competitive advantage due to their status as part of the public sector. There are different methodologies available to calculate “full cost attribution”:

- Fully distributed costs include both the direct costs of the production of a good or service and an allocation of indirect costs, such as capital costs and corporate support.
- Avoidable costs, on the other hand, are those costs that would be avoided by an agency if the good or service was not provided. If an entity could earn revenue equal to or in excess of its avoidable costs it would not impose any costs on any non-commercial activities of the agency.

It is important to note that if a fully distributed cost base is used to set a minimum revenue requirement it is possible that the agency could neglect opportunities to efficiently supply goods and services because this method includes costs (such as overhead costs) that would have been incurred anyway in running the non-commercial activities of the agency. For this reason the Commonwealth Competitive Neutrality Complaints Office (1998) advocated the use of an “avoidable cost” allocation method.

The TFS levies a range of internal charges for facilities and services provided to TasFire Training. TasFire Training currently operates from TFS premises and hires the fireground for practical components of courses. The TFS charges rent equivalents for the hire of premises based on commercial rental rates. Similarly, the TFS provides a range of other services such as computer and administration functions.

While the closure of TasFire Training would result in some cost savings for the TFS, there are a range of costs that currently result in the adverse financial outcomes for TasFire Training that would not be reduced. In other words the total internal charges exceed the “avoidable costs”. Unless the TFS rented out the premises currently occupied by TasFire Training, the cost of operating the centres would not change substantially. Similarly, only a portion of some other internal charges would be saved. For example, the TFS estimated that



the TFS would still be responsible for over \$9,000 of computer/administration charges currently levied against TasFire Training.

The cessation of TasFire Training courses would result in an inefficient outcome - an undersupply of training services. The merger with Learning and Development would address this inefficient outcome.

The merger of the TasFire Training and Learning and Development would provide a pool of trainers to facilitate more flexibility in training delivery. TasFire Training personnel could be used to provide training to firefighters in periods when commercial courses were not scheduled. This would enable the TFS to increase the quantum of training to career and volunteer firefighters, thereby increasing overall skill levels and ensuring higher levels of OH&S for TFS staff. This wider training role would increase the variety of work for trainers.

The process of merging the two sections would need to address a number of issues and would also provide an opportunity for a thorough review that could include:

- Development of the structure of the new entity, revision of management responsibilities, reporting lines and duty statements;
- Review of staff competencies and qualifications and implementation of a staff training and development plan to meet operational needs and provide opportunities for staff;
- Review of commercial operations including the content and range of courses offered. A strategy of increasing the range of courses over time could commence with the restoration of courses that were previously offered such as *Confined Space* and *Working at Heights* training. A program for the introduction of new courses could include consideration of courses offered by competitors or interstate public sector organisations that are similar to TasFire Training; and
- Competitive neutrality principles would apply to the commercial activities. Systems would need to be established to apportion costs to the commercial and non-commercial activities of the unit. The diversification of duties for TasFire Training staff to include delivery of training to TFS staff would reduce the costs of internal charges for commercial activities which would make these activities more cost effective.

## 6 Conclusion

The closure of TasFire Training would be accompanied an inefficient outcome that would result in a sub-optimal supply of training due to:

- A reduction in competition in the training market;
- Removal of courses that are exclusively provided by TasFire Training that would cause disruption to employers and possibly result in a reduction of training;
- The removal of subsidies to the community sector would reduce training due to financial constraints; and
- A lost opportunity for TasFire Training to make a substantial community contribution by expanding its role to include programs such as the *Project Wake Up!* transition, the School Fire Education Program, the Juvenile Fire Lighter Intervention Program and social marketing campaigns

The alternative of merging TasFire Training with Learning and Development and expanding community education functions would deliver considerable benefits to Tasmania and the TFS. The economic and social contribution of TasFire Training would be maintained and

could be expanded over time. The TFS would maintain access to the reserve operational capacity of TasFire training staff. The availability of additional trainers would provide greater flexibility in the provision of firefighter training and an opportunity to provide more training to increase the competencies of firefighters and the ability of the TFS to deliver a safer working environment.

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