



New Zealand Professional Firefighters Union
Te Kāhui Kaipatuahi o Aotearoa

RESPONSE TO THE FENZ
TECHNICAL COMPETENCY FRAMEWORK
PROPOSALS FOR CONSULTATION
AUGUST 2021

1. This submission on behalf of the NZPFU representatives, subject matter experts and membership. The NZPFU represents approximately 70 percent of all employed FENZ personnel. Our approximate 2000-strong membership are professional career firefighters (up to and including Assistant Area Managers and appointed Group Managers); communications centre personnel, FRMOs, VSOs and trainers, members who have accepted positions in the new structure including Group Managers, Community Risk Managers and CRR and RR Advisors and other roles as employees of FENZ.
2. The FENZ August 2021 TCF framework is designed to retrospectively give credence to employ and appoint personnel who have not come through the rank system, have very limited operational experience and often only in one type of response, are unable to produce independently assessed relevant qualifications or independently verified experience. It is designed as a race to the bottom. It is designed so that the level of "suitably competent" is so low and nebulous that it can be applied to just about anyone. And it will be regardless of the risk to the personnel on the incident ground or the community they are charged with protecting.
3. This framework does not reflect or respect the proposals or decisions FENZ made as a result of the August 2018 Operating Model consultation and published in June 2019.
4. In August 2018 FENZ distributed for consultation the "Operating Model Detailed Design". The design provided for technical knowledge, recognised qualifications, assessment standards, and accountability of decision-making:

- i. At page 56:

Right person as Incident Controller The person in control should be an officer with assessed qualifications, skills and experience (including local knowledge) to manage that incident safely, effectively and efficiently.

- ii. At page 57:

For complex incidents that require specialist technical knowledge (for example, Urban Search and Rescue, campaign wildfires, hazardous substances and line rescues) our resourcing and leadership levels would enable either:

- *the Incident Controller holds the specialist technical knowledge, or*
- *the Incident Controller has specialist incident management expertise, but is supported by an advisor with specialist technical knowledge.*

- iii. At page 58:

Our people need technical skills that enable them to efficiently and effectively respond to their community's risk and need across all 4Rs, and to make sure our people in non-operational roles have the technical skills they need to perform their roles.

Key principles

The future learning and development framework will seek to provide pathways to recognised qualifications as outcomes. The framework should be modular, flexible, community risk-based and include the ability to recognise transferrable skills. It will seek to provide pathways to recognised qualifications.

Consistency of assessment

Everybody who attains a technical competency will be assessed to the same standard:

- *Regardless of whether they are employees, volunteers, contractors or personnel from partner agencies.*
- *Regardless of how they have accessed their training, including practical consolidation of learning, as and when appropriate.*

iv. At page 60:

What Leadership and Management Competency Levels will look like

Formal training, consistent standards and assessment criteria and visual identifiers will make it easy for our people and people from other agencies to identify and have confidence in the competency level of our leaders.

- *Leadership and management development will include the competencies and subsequent application of those competencies required for incident command, control and coordination and the IMT function.*
- *Leadership and management competencies required for non incident or response related activities have also been identified, developed and recognised.*
- *The accountability and authority of leaders will be clearly defined and widely understood.*

v. And at page 61:

Authority will be assigned based on demonstrated and current technical and leadership competencies. It will not necessarily be a reflection of a person's length of service or job role.

5. The FENZ Operating Model Consultation: Summary of Feedback dated June 2019 the above cited principles for command and control, and for Competency were adopted. But now in August 2021 we have a technical competency framework proposal that does not comply with those principles as there is no reference or any requirement for assessed qualifications, skills and experience, no requirement for technical skills or any attempt to provide pathways to recognised qualifications as outcomes.
6. The August 2021 TCF proposal does not honour the repeated statements made by the CEO, National Commander and FENZ in a range of documentation since 2017, including the Tranche 2 proposal dated September 2019 and the subsequent decisions. The proposed TCF does not live up to the pledge "the principle of the

most suitably qualified or trained person being in charge of incidents – this does not and will not change”¹. The August 2021 proposal only uses the word qualification once – and then only as a respectful behavioural skill. ²

7. We refer to the NZPFU submission dated October 2019 in response to the Tranche 2 consultation document, with particular reference to the section titled Safe Systems of Work (pages 16-32). We repeat those submissions which remain valid and relevant to the August 2021 proposal including:

48. FENZ’s proposal attacks the rank and command structure by removing the necessary protections to ensure critical decisions are made with tacit knowledge to ensure safe, coherent and appropriate allocation of firefighters and other resources for the most effective response and better outcome for the public at risk at that incident.

51. Firefighting and response to emergencies is built on trust and teamwork. Trust is an integral part of the safe system of work. Firefighters are literally putting their health and lives in the hands of those that they respond with, and those they take orders from. They have to be able to rely on each other to survive. Firefighters are being required to risk their lives, their health and their wellbeing every time they respond. In order to walk into a fire, or respond to a dynamic incident, the firefighter must be able to trust their uniform, equipment and safe systems of work. This is not an immediate mindset upon putting on a uniform. This is a mindset achieved through the years of safe systems of work that have kept their predecessors safe, their superiors safe and their colleagues safe.

52. Safe systems of work include all preparation, planning, management of resources, training as well and as the tactical execution of response and the development of response procedures have been undertaken by qualified and experienced personnel and subject matter experts.

53. The NZPFU FENZ collective agreement codifies out the requirements for the progression through the ranks up to and including Senior Station Officer. Each progression requires the undertaking of a course, assessments and embeds the required minimum years of experience before the firefighter can seek and achieve the next rank.

54. The FECA FENZ collective agreement sets out the terms and conditions for employed Senior Officers above the rank of Senior Station Officer and below that of Assistant National Commander. In order to be employed as a Senior Station Officer the employee has to have completed the complete career training and qualification programme (recruit and all promotional courses and requisite years of service up to and including Senior Station Officer).

55. This system ensures that those commanding an incident, making the assessments and the orders on scene can do so knowing that the firefighter has

¹ Building Fire and Emergency New Zealand – proposal for our organisational structure, approach to rank, Message from the Chief Executive, page 2.

² August 2021 Technical Competency Framework proposals for consultation, Page 35.

been uniformly trained to that rank and the specific tasks for that rank. The firefighters undertaking the tasks know that the Officer has been trained and assessed on the ability to make those decisions, is qualified to make those decisions and has the prerequisite years of experience to draw upon in making that decision. Just as importantly, the firefighter knows the Officer has been a firefighter undertaking the tasks they are now being assigned and therefore is not asking the firefighter to do anything they would not have been done themselves.

Response to Section One

8. The CEO's comment that the framework "represents a shift in how we measure leadership capability" demonstrates the failed premise of this exercise. FENZ has either failed to grasp or deliberately ignores that a technical competency framework for senior operational personnel should focus on the skills, qualifications experience needed for sound leaders in command and control at an incident.
9. Recent video conferences hosted by David Guard and Ian Pickard contradicted this statement. When it was pointed out that the Technical Competency Framework was in fact more of a leadership development framework David Guard denied that was the case.
10. The Message from Kerry Gregory refers to *"increasingly being called to severe incidents requiring specific technical skills and refined leadership expertise. As an organisation, we need to ensure we have across-the-board measure of these skills for the highest ranks and operational skills"* and *"This framework as proposed ...seeks to provide a consistent measure of competence to ensure that the people leading incidents in senior roles have the skills and experience to do so effectively.*
 - FENZ completely ignores the career rank progression system of qualifications and years of experience which provides the ability to make sound and safe tactical decisions.
 - These are not just leadership roles; these are personnel who make decisions that determine the outcome of response and may ultimately determine whether firefighters are harmed or killed in the line of duty.
 - There is no intention for any qualifications. The word qualification only appears once in the document and not as part of any framework.
 - The word "technical" appears infrequently in the document. The attributes repeatedly referred to are aligned to a leadership development programme, not a technical competency framework for incident commanders.
 - There must first be a standard in order for the necessary attributes to be measured. Necessary attributes are not just skills, they include qualifications and experience. Any measurement must be consistent and independently assessed.

Response to Section Two

11. This is not genuine consultation that meets the requirements as provided for in Part 1 Clause 20 of the FENZ NZPFU collective agreement as we have not been consulted at a time where we can influence any change. The timetable provides for the decisions to be made and implemented within a month of the deadline for response. This timeframe confirms FENZ has no intention of significantly altering its proposal regardless of feedback. We have been informed that NTC is already working on the course/training content with the education team which further demonstrates FENZ has no intention of altering its position on this framework.
12. The NZPFU and FECA submissions should be given considerable weight and preference in the review of the feedback received in this process. The proposed Technical Competency Framework will be applied to members of the NZPFU. Other members will bear the consequence of any framework by being under the command and control of those to whom the framework has been applied. The health, welfare, safety of our members will be in their hands. Commanders have their lives literally in their hands.
13. This document has not been “co-designed” or drafted with the input of key representatives. Both the NZPFU and FECA withdrew from the supposed “co-design” process as it was clearly a sham and FENZ had already determined the scope and nature of what a TCF was to achieve. FENZ had already determined it would not include any qualifications or independent assessment of qualifications and competencies.
14. On the 23rd March 2021 the NZPFU wrote to the National Commander setting out our concerns that there was *“no intention to have tangible and transparent assessed pre-requisites and qualifications for the appointment to the ranks of Fire Commander and Assistant Fire Commander. We believe the Technical Competency Framework (TCF) is a misnomer as the current plan does not include any technical requirements or any assessable competencies.”*³
15. Our 23 March email accurately predicted FENZ’s position as provided for in August 2021 proposal and the reasons we withdrew from the TCF working group remain valid and are repeated as a response to the August 2021 proposal:
 - *The TCF has been fundamentally flawed from the start as the intention is to avoid current rank and command requirements to enable FENZ to appoint non-qualified or sufficiently experienced personnel to the operational roles of Commander and Assistant Commander. FENZ’s perspective that integration changing current qualification, training and experience standards in the rank system to level the playing field to appoint those that cannot meet those standards as Commanders with ACL3 is wrong and dangerous. Integration does*

³ 23 March 2021 email from NZPFU National Secretary to FENZ National Commander with attached 25 January 2021 letter of feedback attached. Email and attachment are included as Appendix 1.

not require sacrificing the necessary foundations of qualifications and experience to be able to appoint those that cannot meet those standards.

- *FENZ's approach is confused. On the one hand FENZ is trying to develop generic standards to obtain ACL3/be appointed to Commander/Assistant Commander roles yet insists the Commander will only be deployed or have command and control authority for the type of incident they are qualified and experienced to attend. If there is no intention to deploy rural personnel to command incidents other than wildfire, then there is no need for a generic technical competency framework.*
- *The correct approach would be to assess the current training, qualification and experience requirements for Commander ranks to determine any gap that should be addressed:*
 - *For Commanders who will be deployed to all types of incidents and in command of career firefighters the starting point should be the analysis of the current career rank system with qualification and experience requirements and the current Executive Officer programme to determine what enhancements or further development is needed. If there is a gap such as leadership training then the Technical Competency Framework should address that gap but with tangible and assessable qualifications/competencies.*
 - *If there is an intention to appoint rural personnel who cannot meet those pre-requisites and standards, then an analysis of the qualifications and experience required for rural response types should be analysed. If there is a gap such as leadership training then the Technical Competency Framework should address that gap but with tangible and assessable qualifications/competencies for those specific response types.*
- *If FENZ continues on this path of removing the fundamental foundations of safe systems of work we see the following scenarios resulting – all with possible dire consequences for the health and safety of firefighters, and the community they are supposed to protect.*
 - i. *A critical lack of experienced, trained and qualified Commanders available to deploy to all types of incidents. This will result in SSOs and SOs having to take command in incidents they are not trained, qualified or experienced to command.*
 - ii. *Commanders deploying to incidents that they are not trained, experienced or qualified to command.*
 - *The Commander will put everyone on the incident ground (including the public) at risk and may mismanage the incident resulting in avoidable injury or death; and/or*

- *SSOs and SOs will have to take command to minimise the risk to health and safety (including the public)*
 - *The issue of sound and safe Command is battled on the incident ground impacting on the management of the incident and the safety of all*
- iii. *Commanders being deployed to an incident they are trained, qualified and experienced to attend but the exposures and risks develop into an incident the Commander is not competent to command.*
- *The Commander will put everyone on the incident ground (including the public) at risk and may mismanage the incident resulting in avoidable injury or death; and/or*
 - *The SSOs and SOs will have to take command to minimise the risk to health and safety (including the public)*
 - *The issue of sound and safe Command is battled on the incident ground impacting on the management of the incident and the safety of all*
- iv. *Commanders cognisant that they are limited in their training, qualifications and experience will just not deploy at all. A repeat of the Christchurch earthquake scenario again where the Fire Service was heavily criticised for the absence of qualified and trained Commanders.*
- *For all the above reasons the NZPFU cannot continue to participate in the TCF Working Group. It was established to give the perception of subject matter experts developing a robust framework when in reality it is a sham. Regardless of the advice or evidence provided, FENZ will obstinately continue with its plan to strip safe systems of work solely to parachute those it desires to Commander rank regardless of their training, qualifications or experience in the incident types or the level of incident.*
 - *It is clear that our involvement in the TCF will not influence the outcomes as FENZ is determined to peel away the necessary training, qualifications and experience purely to give legitimacy to appoint personnel to Commander ranks that otherwise would not meet the standard for all incident types.*

16. The NZPFU organised a group of SMEs to draft the response capability needed for the command, control and coordination of emergency incidents. The result was the ***NZPFU Career Professional Firefighters and Commanders Authorised Command Level, Integration, Transition and Future Pathways Arrangements.***

17. We **attach** that document to be read as part of our response to FENZ's August 2021 proposal. The technical competency framework (TCF) and leadership development framework (LDF) provide a leadership development focus and very little in command, control and coordination, other than reinforcement of existing competencies. However, these frameworks combined with the addition of the command focussed level (ACL) 1 to 4 progression program, would complement one another ensuring command competencies align with the desired leadership traits and behaviours of the organisation. This would deliver the organisation the required skillsets and competencies, along with the pathway to achieve these, across both leadership and command. The net outcome of this would be increased firefighter and public safety, along with reduced organisational risk.

Response to Section Three

18. The statement *"There are currently no comprehensive training support or assessment tools and processes to ensure a standardised level of professional competency for personnel who fulfil leadership roles at complex incidents beyond first tactical response; which aligns to a severe local level incident and above"* is blatantly incorrect. FENZ is choosing to ignore the relevance of the professional career rank progression system up to and including SSO, and the current EO qualification which is built on qualifications and experience. FENZ has failed to recognise the successful ILDC course which has a week of leadership, cultural and diversity and inclusiveness training built in. FENZ has also chosen to ignore the more limited volunteer rank progression system and the various qualifications available for various types of response. Professional Career SO and SSO and current Commanders fulfil command and control roles at complex incidents and beyond first tactical response.
19. The characterisation of a Severe Local incident as one that *requires the deployment of resources beyond the initial tactical response⁴* omits a series of stages between first tactical response and complex incidents. A first alarm is the first tactical response and under the framework definition. The statement fails to take into consideration that growing complexities does not necessarily align with scale. An incident requiring fewer resources can be complex.
20. *"The IMT structure required to respond effectively will be established with operations being divided into geographic or functional sectors and the establishment of delegated incident management roles."* Does this mean every time an incident is sectorised?
21. *"Local authorities and stakeholders will be involved. The incident may be unprecedented for the local area and may require elevated problem-solving and decision-making skills."* How often does this occur and what is meant by elevating skills? This leaves a huge gap of competency to lead incidents below these thresholds which may not be particularly large, but very complex.

⁴August 2021 Technical Competency Framework proposals for consultation, page 14

22. The proposed Framework aims to take affect from "Severe Local Incidents" and above. This leaves a large gap in incident response. On-call Urban Executive Officers currently receive a pager notification for 2nd alarm and are required to attend at 3rd alarm. Under this August 2021 proposal 3rd alarm, even 4th or possibly 5th, would not meet the requirements of a "Severe Local Incident which ignores the fact that Executive Officers are required to attend due to their Authorised Command Level.
23. If the framework only applies to "Severe Local Incidents" how can FENZ be assured that responding Senior Officers have the right "knowledge, skills and attitude" for these events. 3rd alarm events typically have a smaller IMT due to the incident size, requiring much more operational input from Executive Officers. Currently they have that knowledge as they have passed through the TAPS programme, but some of those appointed under Tranche 2 and in the future will not have had any experience in that incident type. In contrast Rural Executive Officers (PRFO, DPRFO) frequently attach themselves to 1st alarm events in their area. One reason is that the hierarchy within Rural brigades is not as deep as in the Urban environment, each truck is led by a Crew Leader (not an Officer), and therefore they require immediate Command and Control capability. Again, this framework touches on none of the "knowledge, skills and attitude" required to do that.
24. The framework using inconsistent terminology without adequate explanation or description for the difference. The characteristics of a Severe Local incident are described at page 14 but the discussion in the following pages only refer to "complex incidents". It also fails to use language and terminology relevant to the "Incident Command System" chosen by FENZ further confusing issues. Fig 1 page 13 contains an abbreviated CIMS incident clarification example which again highlights the gaps in incident command and general ambiguity this draft TCF may create to end users.
25. There are bold statements made throughout without any evidential basis in support. For example, the claim that a Regional Severe incident would have a more complex IMT structure than a Local Severe incident is challenged.
26. There is clearly no real intention to have any requirements for technical competencies. The word "technical" is only appears a couple of times throughout the body of the proposal. The definition of competency being made up of knowledge, skills and attitude sums up the very heart of the failure of this proposal to meet any basic standard for a safe system of work. The emphasis is on soft skills and operational, technical, tactical experience or qualifications are not part of the competency framework. Therefore, it is a misnomer to call this a technical competency framework.

27. The framework misunderstands or misuses the KSA Model. KSA is a human resource recruiting and interview method. It is not a method appropriate for command and control of incidents where competent tactical decisions must be made quickly and safely as the lives of those responding, and the community being responded to are at risk.
28. The weight given to attitude is misplaced. In accordance with the 2018 and 2019 operating model design the objective was to have assessable qualifications and attributed. This framework discards any requirement for assessable qualifications and experience and instead places weight on emotions, belief systems and values. Attitude is appropriately part of a leadership model, not one of three key tenants in an incident control and command model.
29. The "foundation skills" an individual will be required to have in order to enter the proposed framework do not include operational skills and knowledge expected of a senior officer" along with the listed Behaviour based and other skills as pre requisites leaning heavily to "soft skills" clearly signals those entering the TCF process will not be required to have operational experienced but form part of an emergency management team (Not Incident management team) that will be responsible for operational decisions affecting the safety of many (civilians, and firefighters alike)
30. There is no basis or evidence provided in the proposal to form any basis to claim the alleged benefits of the proposed framework. This framework will not achieve safety, confidence or increased professionalism. It is in fact designed to enable the appointment to Commander ranks those that would not meet the most basic requirement of assessed qualifications and level of experience.
31. The framework does not recognise the necessary confidence those responding must have in those in command and control of the incident. The rank progression system that combines assessed qualifications and experience is a universally accepted technical competency system as it has been proven to provide safe systems of work. Those taking the orders must have the confidence of those in command. The firefighters can only have that confidence if they know those making the orders are trained, experienced and competent. This framework will not provide any confidence as those in command will not have to be assessed as trained, qualified and experienced.
32. The framework will not build a united culture as there will be no confidence by firefighters in those that have not been assessed as trained, qualified or experienced. This is an attempt to force firefighters to blindly accept orders regardless of the consequence. It will not happen. Firefighters have the right to refuse orders that unnecessarily risk health and safety.

33. The framework will be divisive as it is designed to relegate those with professional career ranks (and therefore assessed qualifications with embedded experience) to SSO level. The framework essentially means that firefighting qualifications and experience are only necessary for the lower ranks and firefighting qualifications and experience are unnecessary for the Commander ranks.
34. In order to command an incident, the controller must understand the capabilities of those under their command. The elimination of any required experience or qualification system means that there will be some who are authorised command that do not know what the career or volunteer rank system means in terms of the training undertaken for each rank. This will result in firefighters not being tasked in accordance with their rank which will mean they are either underutilised, or wrongly utilised. Such decisions could directly impact on the health and safety of those responding, and the community being responded to.
35. The proposed framework puts firefighters and the community at risk. It will enable unqualified, inexperienced personnel to take command. Depending on the roster their experience going forward may also be limited. In comparison SSOs turn out regularly taking command and control roles at a range of incident types and levels. This framework similar to the CDEM framework differs on a key matter of frequency. A "few demonstrations "of competency are not enough to assess and maintain currency of competency at incidents as this TCF proposes. Whereas a SSO and SO have a greater frequency through completion of various progression levels and incident frequency through incident attendance numbers.
36. The competencies and levels of proficiency are meaningless when there are no requirements for assessable qualifications or standards. These concepts do not correlate to tactical decision-making on the incident ground. They are more aligned with leadership skills. Much of this framework is not suitable for Commander ranks, only for management positions.
37. The incident level matrices are based on emergency management principles not incident management, this blurs the lines between the two and creates confusion as the two are quite distinct, with different skillsets and parameters for effective performance. This is where the terminology of IMT has become a blanket term describing incident leadership and management across both incident management and emergency management, yet this is not strictly accurate nor quite how structures are reflected within FENZ across all incident types. The triggers for a severe local incident do not make sense as an incident will be sectorised well before these thresholds are met.
38. The framework incorrectly applies CIIMs principles. CIIMs is designed for emergency management and not incident management. Trying to apply emergency management to incident management is not appropriate. FENZ has lost sight of the fact that for incident management it is the primary agency within an overarching structure.

39. It appears the level of proficiency has been replicated from a civil defence model which is inappropriate. Civil defence is a different target audience requiring different technical competencies and experience. Those operating under civil defence don't come from the same response background at a tactical level. The civil defence framework built for council or general managers where command and control of incidents are not their primary or core duties. They have time to make decisions and consult across a range of roles. The FENZ technical competency framework should be based on building blocks develop as career firefighters to make sound, safe and rapid tactical decisions.
40. The incident complexity level (then referred to as severity level in the diagram) does not reflect or demonstrate reality. It lacks an understanding or that an incident can be complex regardless of scale at local or regional level or that an incident may not be complex even if larger scale.
41. Due to the complete absence of any assessable qualifications or skills, we cannot see the requirement of reliable competencies, or how competencies can be measured as proficient.
42. In order to be proficient at a task, the task would usually have to be undertaken repeatedly. The framework eliminates any requirement for accessible or measurable experience so the scale of proficiency lacks any meaning or credibility. How can one be deemed proficient if there is no consistent assessment of the task or skill?
43. The framework further flounders as there appears to be reference to those above Commander deeming competency. We assume these must be regional managers. The Region Managers have not had to be assessed as competent for command and control so how can they then assess others as competent.
44. Foundation skills referred to do not include operational skills and knowledge that should be expected of senior officers. This is dangerous as those without operational experience will have a false view of their capability. There are no protections to ensure the most qualified and experienced takes command.
45. The current appointments to District and Group Managers will be made a mockery in some regions of the claim that Fire Commanders are expected to be at a higher proficiency level of incident complexity than Assistant Fire Commander. For that to be true, in some areas the Group Manager (who has come through the career rank structure with qualifications and assessed years of experience across all incident types) will have to be awarded Fire Commander while the District Manager (who has no assessable qualifications and only limited if any actual command experience for one incident type) will have to be awarded Assistant Fire Commander.

Response to Section four

46. This framework was not developed by a Working Group that reflects the FENZ community. The two primary organisations FECA and the NZPFU withdrew from the process as it was a sham. FENZ had decided what it wanted regardless of SME input,

evidence and submissions to the contrary. We repeat the reasons the NZPDU withdraw as outlined above.

47. The framework as provided does not reflect the views, evidence or work provided by the NZPFU representatives on the various iterations of command and control and technical competency working groups over the past few years. We repeat our comments above in the introduction to this submission.
48. *"The longer-term intention, if the decision is made to proceed with the Framework as now proposed, is to extend the proposed Framework to cover all Senior Officer ranks and specialist IMT roles"* misunderstands what IMT roles are – there are standard IMT roles – they are not specialist as they are required for an IMT. There again is no clarity as to whether the intention is incident management or emergency management. The signalled confusion between incident and emergency management should be a red flag that the senior leadership of the organisation does not understand the distinction. These are possibly the same people who will be assessing the competence of those on the framework.
49. There is reference to "examples of good practice from international emergency and incident management frameworks" but the details of which ones have been applied are not provided.
50. The competencies, sub-themes, descriptor content and proficiency levels are primarily concerned with leadership skills, not the necessary requirements for safe command and control at incidents.
51. The proposed framework falls well outside of the original project scope and intent. The proposal does not resemble the original purpose or the Technical Competency Framework Working Group Pack which detailed the design principles including *"The design of the framework competencies will focus on those needed for effective performance **on the incident ground** at the appropriate level relating to ranks only"* and "the definition of technical proficiency *"there may be a requirement to demonstrate technical **knowledge of a range of incident types**" not a generic management skill, soft skill base."*

At Page 6

*The framework will provide fire and emergency with the assurance that people have the required level of **operational skills and knowledge** to be appointed to these ranks.*

*The technical competency framework will also be an important tool to help ensure our people **are safe on the incident ground.***

At Page 9

*Technical competencies **for incident command and rank are the skills knowledge and behaviours that contribute to safety and performance in leadership on the incident ground.***

At Page 12

The design will acknowledge that the framework and associated assessment process will eventually be used by Fire and Emergency as a career progression tool and need to interact with other fire and emergency people processes,

At Page 14

*Technical Proficiency- there may be a requirement to **demonstrate technical knowledge of a range of incident types.***

At Page 15

*In Scope- Development of a draft framework ready for consultation that include the **definition of competencies for built and natural requirements on the incident ground (mixture of command leadership and Management CLM)***

52. The tables of competencies are focused on the soft skills, not what is needed for effective performance on the incident ground. Only the "manage risk" and situation decision-making cover attributes necessary for decision-making on the incident ground but are toothless without any required qualifications, experience or assessment.
53. The "applied, highly competent and advanced" columns are meaningless when void of any framework for assessment, and how those that assessed will be deemed competent to assess.
54. "At a level above first tactical response, which aligns to severe local incidents and above" does not make sense and is out of context, a level above first tactical response is not a severe local incident.
55. The application of some competencies and skills are inappropriate in the context, or not provided the appropriate weight:
 - Information management and insights is an intelligence function responsibility, not Incident Controller or Operations
 - 'Manage Risk' is in general a logical competency however, "escalating issues to higher levels of response or governance" when the IC may well be this person, means they must have intrinsic knowledge on how to apply decision-making to risk when there is no way to elevate it. This is critical when developing and reviewing strategy and tactics.
 - 'Planning' is a planning function competency, not IC or Operations.
 - 'Situational Awareness and Decision-Making' competency is one of the two pivotal response requirements and these should be weighted higher than the others. This competency talks about managing safety and making it the centre of decision-making from turn-out, to return to station. This is not something the IMT have control over. They can only influence safety on the incident ground and whilst they are in attendance. What happens before and after is out of their control.

- 'Technical Knowledge and Skills' is the other pivotal competency and should also be weighted as such.

56. Similar criticisms to the competencies apply to the foundation skills. Without required standards of assessors to assess the level of competency against consistent requirements (including qualifications and experience) this is just a framework of desired soft skills that will not create any confidence or consistency on the incident ground.

57. The proposal appears to have been very deliberately and disingenuously written to dance around the importance of practical operational knowledge and skills. It carefully avoids any reference to command and control competency. The "applied" level of competency appears to accept that only basic foundation skills are acceptable across the board. The standard is so low it is difficult to see how anyone could not meet it.

58. The self-assessment concept holds no weight in any confidence of the competence of those awarded rank in this manner. The "unconsciously incompetent" applicants will simply get absorbed in a process that is designed to shield them. The system is clearly designed with the "assess till you pass" ethos. While this is user friendly for the candidate, it does nothing for the integrity of the system nor the calibre of the graduates. FENZ is trying to build a framework to condone the appointments already made under the weak and ineffective CORE system. The calibre of some applicants who are without any assessable qualifications or experience should not be basis of a framework to deem personnel competent to command an incident ground.

59. *"Foundation skills as listed in this document, represent the incident ground leadership skills, knowledge and attitudes an individual will be required to have in order to enter the proposed Framework. It must be noted that they do not include operational skills and knowledge that are expected of a senior ranked officer" is fatally flawed as* critical operational skills and knowledge of the appointee cannot be assumed at this point. These are too critical to be overlooked or assumed. If they do not form part of the foundation 'entry' requirements, then there needs to be a rigorous process to assess these prior to foundation. The career TAPS SSO assessment should be applied utilising the usual assessors to preserve and protect the integrity and rigour of the process.

60. The listed foundational skills are much too broad to be assumed as being already possessed by candidates for the framework and would also need assessment alongside the technical knowledge and skills.

61. The suggested *relationship management* mapping for Assistant Fire Commander at 'applied' are pitched too low for critical incident management and leadership. The *situational awareness and decision-making* and *technical knowledge and skills* proficiency levels are also too low for both ranks. They need to be operating at an optimum level in these critical areas. No one is required to have advanced technical

knowledge and skills (and there are no indications of what those technical knowledge or skills are).

62. Fire Commanders are expected to have advanced self-awareness yet if there is no standard of ability or experience on which to base that self-awareness it is meaningless. There is no consequence if in fact the Fire Commander has an inflated view of their own capabilities and experience, other than harm to those under their command.
63. The case studies make no sense as the same answer is applied to both Case Study One and Two despite different questions being posed.

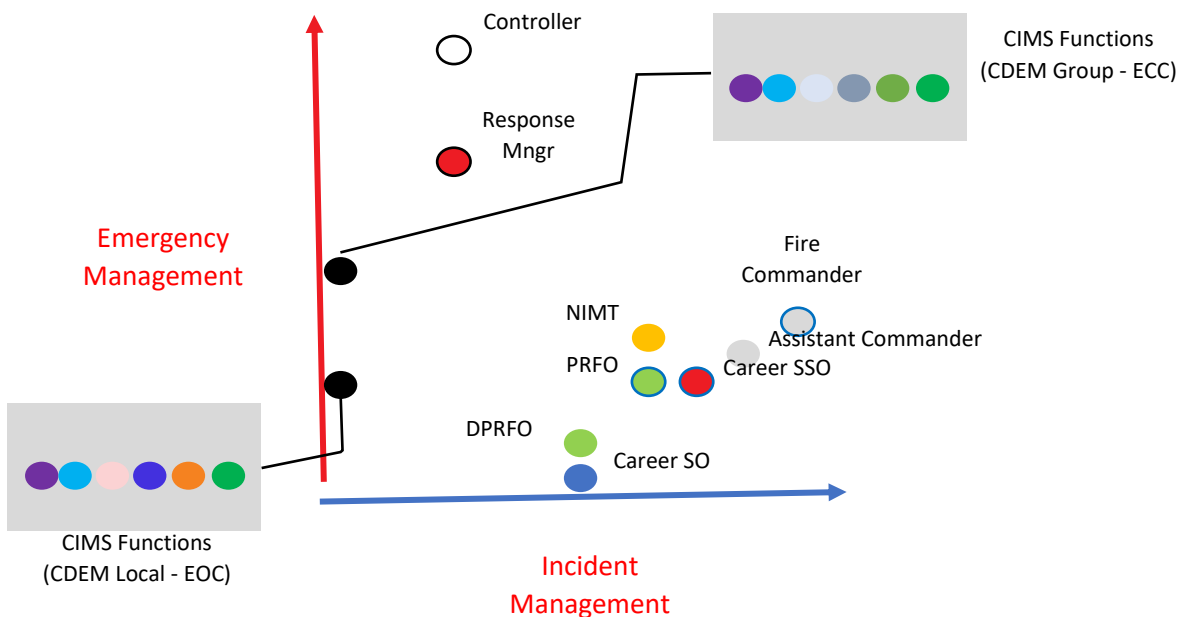
The proposed process for moving off transitional rank includes the incorrect assumption that those authorised to take command and control of an incident have confirmed their relevant incident ground experience (CoRE). CoRE is not a consistent and accurately measurable means of assessing existing skills. This should be assessed prior to transition. We have previously submitted the significant flaws in CORE which required no independent assessment of the claims of competency and experience made by the applicant. In addition, not every applicant was assessed against CoRE. We have been informed there are successful applicants for positions that are now included on the roster that were not required to undertake CoRE for the position.

64. The proposed process for moving off transitional rank perpetuates the fundamental and fatal flaw of the whole proposal – there is no requirement to provide evidence of assessed competencies and capabilities. The self -reflection and portfolio of evidence can be fabricated or exaggerated.
65. The proof-of-concept assessment does not appear to require any pre-requisite confirmation of experience or skills. It does not appear to be a pass-fail concept. If there are not required qualifications or experience, then we have no faith that the proof-of-concept can live up to any claim of a robust process. The fact it relies upon a self-reflection activity as a prerequisite demonstrates there will be no independent assessment of any capability.
66. This appears to be a non-failure type arrangement.

- How is this going to provide for safe systems of work for firefighters when some of these people have only been volunteer SOs, trainers and VSOs? These people do not bring the same skillset as a career SSO.
- The self-reflection suggestion is not effective for the means it is being use, i.e. to identify training gaps. This analysis should be formed ground up, not based on participant reflection.
- Will the portfolio of evidence be reference checked?
- Will it have require independent personnel to substantiate performance? There is a large chasm between being in a role at an incident and performing successfully in it

67. The final approval of the assessment tools and processes will be made by the Deputy CE of Service Delivery and Deputy CE People Branch. There are not operational qualifications and experience required for these roles now. The fact both currently came through the career ranks was a fluke – not a requirement. Therefore there is no protection to ensure these roles are undertaken by senior operational personnel in the future. Surely this should be undertaken by qualified and experienced operational subject matter experts to undertake the duties of this final safety net.

68. "It is Fire and Emergency NZ's intention that those appointed to Fire Commander and Assistant Fire Commander, and future IMT specialist roles and ranks" makes no sense. What are the roles referred to? As stated above the roles in IMT are not specialist roles. All Senior Officers need to be able to competently fill any IMT role at any level of incident. At emergency management level specialist roles are stood up at LCC, RCC and NCC, or through supporting other lead agencies through NCMC.



69. The limits on future numbers of Fire Commanders and Assistant Fire Commanders dependent on the requirements of each region to safely staff the Senior Officer operational roster is wrongly founded on the assumption that those that are assigned the ranks will be safe and effective commanders. There is nothing in the framework to give any confidence of that.

70. FENZ intends to award rank to those in an unranked position. This will cause significant confusion and distrust on the incident ground.
71. The purpose is not to provide a competent pool of ranked Commanders, the purpose is to enable FENZ to appoint personnel who do not meet the standard for a ranked position to get in through the back door of an unranked position.
72. Throughout this proposal FENZ has confused and interchanged leadership skills with incident command skills. They are not the same. The standards and requirements of leadership on the incident ground are different to the skills in other settings. The proposal is fatally flawed as it assumes a good manager would be a sound incident controller. FENZ has no respect for the current rank system that combines assessed qualifications with experience.

That flaw is not only fatal to the framework, it may be fatal to those under the command of the un-qualified and inexperienced personnel appointed to the new roles and under this framework in the future.

Wattie Watson
NZPFU National Secretary
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