

# Appendix A:

## Submissions and comments

We have consulted with the Country Fire Authority, Department of Justice and Community Safety, Fire Rescue Victoria and WorkSafe Victoria, and we considered their views when reaching our audit conclusions. As required by the *Audit Act 1994*, we gave a draft copy of this report, or relevant extracts, to those agencies and asked for their submissions and comments.

Responsibility for the accuracy, fairness and balance of those comments rests solely with the relevant agency head.

### Responses received

Agency	Page
Fire Rescue Victoria	A-2
Country Fire Authority	A-6



Ref/OOC-136

Friday, 8 November 2024

[Redacted]

Victorian Auditor- General's Office  
Level 31, 35 Collins Street  
MELBOURNE VIC 3000

Via Email: [Redacted]

Dear [Redacted]

**RE: 2024 Provisional report: Staff Wellbeing in Fire Rescue Victoria Audit**

We thank the Victorian Auditor-General's Office (VAGO) for their comprehensive audit of staff wellbeing at FRV. While the report identified areas for improvement, it is also an acknowledgment of the significant strides we have made in recent years to prioritise the mental health and wellbeing of our employees.

While we are proud of the progress we have made, we recognise there is always room for improvement. We have accepted all six recommendations and will develop a comprehensive action plan to implement these improvements. Our focus remains on creating a supportive and caring workplace culture where every employee feels valued, safe, and empowered.

I want to commend our dedicated staff for their ongoing efforts in supporting the mental health and wellbeing of our people. Our peoples' wellbeing is paramount, and we will continue to invest in programs, resources, and support services to ensure this.

Yours sincerely,

[Redacted Signature]

**Gavin Freeman AFSM**  
Commissioner  
Fire Rescue Victoria

ABN 28 598 558 561  
456 Albert Street  
East Melbourne  
Victoria Australia  
3002  
1300 367 617  
frv.vic.gov.au



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**Fire Rescue Victoria action plan to address recommendations from Staff Wellbeing in Fire Rescue Victoria**

No.	VAGO recommendation	Acceptance	Agreed management actions	Target completion date
1	<p>Work with secondees, in consultation with the Country Fire Authority, to address the issues identified in our survey about:</p> <ul style="list-style-type: none"> <li>• secondees' awareness of available support</li> <li>• how Fire Rescue Victoria communicates with secondees about mental health issues.</li> </ul>	<p>Acceptance</p> <p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> In part  <input type="checkbox"/> In principle</p>	<p>Agreed management actions</p> <ul style="list-style-type: none"> <li>• Meet with CFA to identify opportunities for collaboration</li> <li>• Invite a secondee representative to sit on the Peer Support Working Group to inform future decisions about wellbeing supports and communications for the secondee group</li> <li>• Meet with FRV Secondee Management Team to identify opportunities for collaboration and enhancement of support and awareness of support for secondees</li> <li>• Continue communicating via known channels (such as CFA intranet page, CFA emails) to secondees about mental health literacy programs, wellbeing check and peer support visitations</li> </ul>	31 <sup>st</sup> January, 2025
2	<p>Prioritise developing and implementing a best-practice employee health, safety and wellbeing strategy so it can proactively identify, monitor and manage risks to staff mental health and wellbeing.</p>	<p>Acceptance</p> <p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> In part  <input type="checkbox"/> In principle</p>	<p>Agreed management actions</p> <ul style="list-style-type: none"> <li>• Conduct facilitated discussions within the Health, Safety and Wellbeing Department to develop key elements of a departmental strategy.</li> <li>• Consult with broader stakeholders, including all districts, on the strategy in a staged approach.</li> <li>• Develop strategy based on consultation.</li> </ul>	30 <sup>th</sup> June, 2025

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<p>3</p> <p>Identify, collect and analyse data to monitor staff mental health. This should include psychosocial hazards and staff's cumulative exposure to trauma.</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> In part  <input type="checkbox"/> In principle</p>	<ul style="list-style-type: none"> <li>• Explore data management systems, seek approval for implementation and implement system</li> <li>• Finalise project plan for psychosocial risk management, and undertake next steps (including seeking external consultancy support)</li> <li>• Continue engaging with AFAC on trauma tracker project, seeking to implement a system based on best practice recommendations</li> </ul>	<p>30<sup>th</sup> June, 2025</p>
<p>4</p> <p>Monitor the take-up and analyse the effectiveness of the suite of mental health supports available to staff.</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> In part  <input type="checkbox"/> In principle</p>	<ul style="list-style-type: none"> <li>• Linked to the above action, explore data management systems, seek approval for implementation and implement system</li> <li>• Develop reporting framework for mental health to inform future decisions</li> </ul>	<p>30<sup>th</sup> June, 2025</p>
<p>5</p> <p>Develop and implement a health standard in line with item 2.3 in the Victorian Government's <i>Year Two to Five Fire Services Reform Implementation Plan</i>, including an accompanying medical standard.                       Fire Rescue Victoria should use its new medical standard to update its pre-employment health screening process for firefighter applicants.</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> In part  <input type="checkbox"/> In principle</p>	<ul style="list-style-type: none"> <li>• A draft of the health standards, and the medical component, has been developed in 2023.</li> <li>• The draft is currently being updated.</li> <li>• The UFU has been contacted for consultation</li> <li>• Once the standards have been developed these will be implemented where relevant, such as the pre-employment health screening process</li> <li>• Planned cyclic revision to be included in the endorsement process</li> </ul>	<p>30<sup>th</sup> June 2025</p>

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6	Update and document its pre-employment health screening process for firefighter applicants.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> In part <input type="checkbox"/> In principle	<ul style="list-style-type: none"> <li>The pre-employment health screening process is dependent on the development of a Health Standard.</li> <li>Meet with stakeholders (Recruitment, Medical Services, Cogent) to obtain current process information</li> <li>incorporate previous and current team learnings (at end of campaign review by mid December 2024) to reflect up to date process</li> </ul>	30 <sup>th</sup> June 2025
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Office of CEO | Headquarters  
8 Lakeside Drive Burwood East Vic 3151  
Tel 03 9262 8444

Mr Andrew Greaves  
Auditor General  
Victorian Auditor-General's Office  
Level 31, 35 Collins Street  
MEBLBOURNE VIC 3000

8 November 2024

By email: [REDACTED]

Dear Mr Greaves

#### Staff Wellbeing in Fire Rescue Victoria

Thank you for the opportunity to provide a submission in response to your report about staff wellbeing in Fire Rescue Victoria (FRV).

As set out in sections 25B(3) and 25(C) of the Fire Rescue Victoria Act, and a subsequent Secondment Agreement with CFA, FRV is required to provide CFA with 242 senior operational leaders, including 160 Assistant Chief Fire Officers and Commanders, 53 instructors and 29 practice area drill (PAD) supervisors and operators. These officers are key to CFA's operational capability and are integrated across a range of CFA functions and sites. They are essential and important members of CFA and as such are provided access to all CFA's support and wellbeing arrangements.

Since Fire Services Reform came into effect on 1 July 2020, CFA has experienced a persistent pattern of unrelieved positions at any one time across CFA, particularly in the ACFO and Commander cohorts (during the time of your staff survey, this was as high as 21 positions across the State or 13.1%, however has been as high as 33 positions or 20.1% during other times within 2023-24).

This results in a number of specific issues that are outside those set out in your report in relation to our seconded staff cohort including:

- Increased workload and fatigue. This is a direct result of seconded staff covering unfilled or unrelieved roles, and in many cases, staff feeling unable or limited in their ability to take planned leave (particularly as in many cases their role would be unlikely to be filled, resulting in a further workload increases on their return). There are also consequent workload impacts on CFA's professional and technical staff.

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## Response provided by the Interim Chief Executive Officer, Country Fire Authority, *continued*

- High levels of unplanned leave. Currently 11% of ACFO/Commander staff and 25% of Instructors seconded to CFA are on unplanned leave. This includes leave taken by staff to address and maintain wellbeing.
- Conflicting working arrangements. The secondment agreement between FRV and CFA is unique and effectively involves the entire middle operational management level of CFA being selected and organised by another organisation. This includes FRV being responsible for standard human resource and wellbeing management arrangements without a direct operational connection to the work being performed while they are at CFA and under the operational command and control of the CFA Chief Officer. In practical terms a seconded staff member is often expected to reconcile what can be conflicting positions. For example, CFA may require an activity to be performed (such as attending an election process for a volunteer brigade which will occur in the evening), but FRV settings may not permit overtime for the activity to be completed. Many secondees attempt to reconcile these conflicts themselves because they are motivated to provide appropriate support for volunteers, but which can add to work complexity, increased levels of stress and poor outcomes.
- Perceptions about disconnect from FRV. This includes uncertainty in some cases about support arrangements offered by FRV (as you note in your report) along with limited professional development and career opportunities, which may then have further impacts on wellbeing.

CFA continues to work with FRV (through the CFA-FRV Heads of Agency Steering Committee) and Government (through the Fire Services Reform Executive Committee) to highlight these issues and seek to mitigate the risks. The CFA Chief Officer's seasonal attestations to the Emergency Management Commissioner also highlight the operational impacts of the secondment model.

CFA takes seriously the health and wellbeing of all its people – whether they be volunteers, staff or secondees. In addition to the support arrangements provided by FRV and covered by your report, CFA has attempted to put in place arrangements to address issues relating to the operation of secondment arrangements. While these are important initiatives designed to support the wellbeing of FRV staff working at CFA, they are ultimately limited by the underlying rate of unfilled and unrelieved positions. This is outside CFA's control.

Supplementary arrangements will continue to be required, and potentially expanded, until such time as the high ongoing rates of vacant and unrelieved seconded roles are reduced. At this stage, it is not clear when this will be. On this basis, CFA supports your recommendation about the need to raise seconded awareness of available support and improve the way FRV communicates with secondees about mental health safety issues.

Response provided by the Interim Chief Executive Officer, Country Fire Authority, *continued*

CFA looks forward to working collaboratively with FRV to implement actions relating to FRV staff seconded to CFA and I would also like to take the opportunity to thank your staff who have worked on this report.

Yours sincerely,



**Robyn Harris**  
Interim Chief Executive Officer