

Inquiry into volunteering in Queensland

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Submitted by:	Mount Mee Rural Fire Brigade - Rural Fire Service Queensland
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Submitter Comments:	

Volunteering Inquiry Submission

To:

The Local Government, Small Business and Customer Service Committee of the Queensland Legislative Assembly

From:

Mount Mee Rural Fire Brigade

19 Thomas Road Mount Mee QLD 4521

CC:

The Hon Ann Leahy MP, Minister for Local Government and Water and Minister for Fire, Disaster Recovery and Volunteers, Member for Warrego

The Hon Andrew Powell MP, Minister for Environment and Tourism and Minister for Science and Innovation, Member for Glasshouse

Dear Inquiry Members,

Please accept this submission to the Queensland Volunteering Inquiry by the Mount Mee Rural Fire Brigade in relation to;

- Volunteering experiences in the Rural Fire Service Queensland (RFSQ).
- Current deficient training and organisational arrangements of the RFSQ.
- A proposed future arrangement of emergency service volunteering in Queensland.

We have provided a list of Recommendations with commentary for your consideration in order to improve the RFSQ. We believe many of these Recommendations are also applicable to the State Emergency Service (SES) and Marine Rescue Queensland (MRQ).

The Recommendations and commentary in this Submission are blunt and controversial to some but are genuine and are based on first hand experience. We make these Recommendations and commentary in the best interests of Queensland, volunteers and the Rural Fire Service Queensland.

We are available to attend the inquiry in person to expand on this submission and provide additional information and testimony if required.

Sincerely,

Mount Mee Rural Fire Brigade.

Compiled by: Ben Noakes (2nd Officer, Secretary, Fire Warden) ph: [REDACTED]

Reviewed by: Michael Alcorn (1st Officer)

Endorsed by Brigade Management Committee

Submission

An Emergency Services Department and independent Services

1. The Qld Fire Department (QFD) comprising the Fire and Rescue Service (FRS) and the Rural Fire Service Queensland (RFSQ) is a bloated bureaucracy without mission clarity that has long failed volunteers. It needs separation, mission clarity for each Service and root and branch reform.
2. Please see Appendix A for a proposed arrangement of Queensland Emergency Services in a Department and Service model with Inspector-General oversight.
3. The Inspector-General is a critical aspect of the proposed new arrangement. This should be the most senior uniformed emergency service member of the portfolio with a mission to audit and test mission readiness, capability and efficiency. The Inspector-General's role is to shine light into the darkest corners of the emergency services bureaucracy and capability to ensure that serving Queensland is foremost along with the elimination of waste and that all aspects of emergency Service's are used to their potential.
4. The Emergency Services Department is another aspect of the proposed new arrangement. This department headed by a Director-General provides all corporate, communication and investigation support to the uniformed Services.
5. The RFSQ should be an independent emergency Service with its own Commissioner. See Appendix B for a proposed organisational arrangement of an independent RFSQ. This arrangement is a streamlined and mission focused that eliminates many current superfluous layers of bureaucracy such as district and regional managers.
6. The current Fire and Rescue Service (FRS) consisting of urban full time and regional auxiliary stations should be disbanded.
7. An Urban Fire Service (UFS) comprising the continuously staffed fire stations in urban areas should be formed in Queensland's most populous twenty localities. See Appendix C for recommended such localities.
8. The regional auxiliaries of the current FRS be merged into the RFSQ as town brigades.
9. All air assets and air desk personal of the Queensland Fire Department should be transferred to the RFSQ.
10. That the RFSQ, and all Services, has a defined and relevant role in emergency response within its geographical area and areas of responsibility. See Appendix D for recommended matrix.
11. The general arrangement as outlined in 5.) to 10.) creates a South Australian style Metropolitan Fire Service (MFS) and a Country Fire Service (CFS). The SA CFS mission statement is "The SA Country Fire Service (CFS) serves South Australian communities with dedicated volunteers providing professional fire and rescue services.". There is no reason that the RFSQ cant do the same and many reasons why they should.
12. That all emergency service portfolio staff ranks be standardised across Services as per Appendix E. This is to eliminate confusion and establish clear chains of command. In particular to recognise the most experienced volunteers as having positions of authority

which cannot be usurped by the most junior of paid staff by mere virtue of being on the payroll. Currently the most junior Fire and Rescue Service firefighter outranks the most senior Rural Fire Service Group Officers.

Leadership of emergency service volunteers

13. The leadership of the RFSQ seems to always be out of state appointees and never people who have actually been volunteers in the RFSQ. They hang around for 24 to 36 months, make a mess and move on before being held accountable for their failures. Sir Humphrey would be proud!. A Queensland volunteer needs to be put in charge and given the political backing to restore the RFSQ to best serve Queensland.
14. We have little confidence in the current QFD Commissioner, RFSQ Chief Officer or RFSQ Deputy Chief Officers. We believe its time to clean house and start afresh.
15. By law, the Commissioner of the Queensland Fire Department is a member of the Fire and Rescue Service. This is insulting and discriminatory to the RFSQ and its membership. It ensures that a non-volunteer can only lead volunteers.
16. We nominate retired RFSQ Chief Superintendent Alan Gillespie as the inaugural RFSQ Commissioner.
17. We nominate current RFSQ Inspector Shaun Toohey as the inaugural RFSQ Deputy Commissioner.
18. That future Rural Fire Service leadership is required by legislation to have a RFSQ brigade officer background. This is to eliminate interstate appointees and those who use the RFSQ as a career stepping stone whilst expanding bureaucracy and making grand unfulfilled promises. You should have walked in the shoes of those you lead and this requires time spent in a rural fire brigade and to have earned the trust of brigade members.
19. That RFSQ headquarters, along with operational, training and project management, should be located in a regional area so as to have an actual connection to Service members and operations. I.e. Dalby, Maryborough or Emerald not the Kedron Emergency Services Complex . This is to ensure that RFSQ leadership is not influenced by big city red truck politics but by a community of volunteers.
20. Require through industrial instruments that RFSQ staff remain in appointed roles for a minimum of three years before advancement or redeployment so as to prevent disruption to local brigades and to ensure continuity and accountability.
21. Require through contractual instruments that the RFSQ Commissioner remain in role for a minimum of five years so as to provide continuity of direction and accountability.
22. The focus of leadership on peripheral issues such as diversity, equity and inclusion (DEI) initiatives and welcome to country ceremonies rather than the basics is compromising the Service's mission. Trucks, training, uniform and membership is what puts out fires.

23. The current legislative prohibition on the Minister giving the department directions is an affront to the Westminster system of accountable government and must be repealed. This crafty prohibition allows the Fire bureaucracy to continue doing what it wants with scant regard to the Government of the day. With regard to 53) our Brigade First and Second Officers met with the Department in conjunction with the Minister and our Local State MP. The Department then didn't abide by the outcome of the meeting and Ministerial intervention was required to ensure they actually did what they said they would. The Minister must be able to provide Service Commissioners direct instruction.

A failed training system

24. The current volunteers training system (Rural Firefighter Development Framework - RFDF) introduced in 2022 is a failure and needs fundamental change.
25. The previous training system called the volunteer learning and development framework (VLDF) should be reinstated until a working replacement for is available.
26. A separate Inquiry into the current failed RFSQ training system should be launched in order to understand how this debacle happened, who allowed it to happen and why it hasn't been fixed. We believe that such an Inquiry should also focus on potential misfeasance in public office by those who designed and then introduced the new training system with reckless indifference to its effects and the danger it has exposed Queenslanders volunteers to.
27. The Australian and Departmental Honours awarded to those who developed the new RFDF training system need to be critically examined and the awards revoked if so found to be undeserved. We believe this aspect should be covered under the recommended inquiry in 26.)
28. The new training system should be designed by volunteers for volunteers with content refinement and course material production to be undertaken by outside contractors to counteract the bias inherent in current RFS training personnel. For example as part of the course for senior firefighter (Firefighter Advanced Skills) this requires a two day course in urban navigation mainly based around the use of out of date and irrelevant paper refidexes that are no longer even printed for rural areas. Even attempting to get a place on this rarely run but mandatory FAS course has exceeded 3 years with no end in sight. This nonsense is compromising volunteer development and morale.
29. A Rural Fire Service Academy be formed to train Brigade Officers and Group Officers to a high standard and capability. This academy should be located in a rural area in close proximity to RFS Headquarters.
30. Our brigade has not been able to assess new members for their Firefighter Minimum Skills (FMS) qualification for over three years since the introduction of the new training system. Our brigade is far from alone here. We need to be able to train and have assessed our new members. We have identified training of new members as the highest risk to delivering our Brigade's strategic objectives and existence.
31. The (so called) RFS Leaderships commentary and action on training is problematic. They refuse to acknowledge the problem, attempt to crucify those who highlight the problem

all the while putting out duplicitous propaganda on training (future irrelevant symposiums) whilst things get worse and minimal training actually occurs.

A bloated and increasing bureaucracy

32. The increasing admin burden on volunteers is reflective of the Leaderships lack of volunteer experience. Administration should be handled by RFSQ staff to curb their enthusiasm for it or eliminated through use of modern online tools such as uniform ordering.
33. The onboarding process for new members is a sad slow pathetic joke. In order to bring the bureaucrats inline a processing time guarantee of 30 days is required. A move to an online integrated process with a production stage methodology would address many of the current bureaucrat and paper form based nonsense.
34. The retention of members is made difficult by the blue card dictates that puts an effective horizon on membership till the expiry of a blue card. The blue card requirement for RFSQ volunteers should be removed immediately. It diverts child safety resources and does not apply to primary producer brigade members. All brigades wear the same uniform but don't have the same basic requirements to go fight a fire. The reasoning given for blue cards is that as RFSQ volunteers could be required to provide, at any level, medical assistance to children is ridiculous and insulting.
35. The location of the RFSQ headquarters at red truck central (the Kedron Emergency Services Complex) is at the root of many cultural and performance issues for the RFSQ. It needs to be moved to a rural area where rural people make decisions informed by rural experience and rural leadership gets direct feedback from rural people.
36. Scrap the new brigade fund credit card system and the 20+ administrative positions created to manage it. These funds should pay for more and better trucks not more desk drivers created to be the answer to a problem that didn't exist.

Funding

37. The RFSQ and each emergency Service should have a separate budget and that any shared service charges (I.e. Firecom) are subject to a service level agreement that is fixed fee, transparent and equitable. This is to prevent bureaucrats and other Services appropriating and obfuscating RFSQ funding.
38. That budget is based on responsibility, capability and capacity in a transparent manner. See Appendix D for recommended matrix of responsibilities. Some rural fire stations don't have toilets or a concrete floor whilst red truck stations have Netflix.
39. The observed waste and mismanagement, bordering on misfeasance in public office, by the current RFSQ and QFD Leadership is extreme. A US style DOGE (Department Of Government Efficiency) type audit line by line of all current and planned expenditure and staffing should be conducted in a transparent manner to cauterise the department back to the basics of trucks, uniforms, training and membership.

40. The new fire department headquarters at Albion whilst still retaining a significant portion of the Kedron Emergency Services Complex is an insult to Queensland and all volunteers. The Albion edifice to arrogance and grandeur must be eliminated.
41. The achievable target of the audit in 39.) should be a 30% reduction in overall funding from what the QFD currently spends. This can be done by boosting volunteer numbers and satisfaction through available relevant training, streamlined administration and a focus on basics and operational excellence.

Volunteer satisfaction and community image

42. Introduce a yearly comprehensive survey of members of which results are linked to the key performance indicators (KPIs) of Leadership at both a local and state level.
43. In any event, all media of the Queensland Fire Department should be split into the Urban Fire Service and the Rural Fire Service. The use of a QFD accounts and branding is confusing. As part of the RFSQ supposed 'separate service' we were advised that separate social media accounts and advertising for each service would happen – like most things QFES and QFD leadership announces – it never happens.
44. Return the RFSQ to a "neighbour helping neighbour" ethos not the current administration heavy and Brisbane centric quasi military image that is being promoted.
45. RFSQ leadership need to get an attitude check in so far that volunteers are not career stepping stones for them but the vast majority of the Service who do all the work selflessly. Support us but don't fakely thank us with more paperwork, bad vehicles and a failed training system. Recommendation 42) would provide a formal assessment of RFSQ leadership performance in regards to volunteers.
46. As per the RFBAQ Submission to this Inquiry, the refusal to release membership figures as per previous years by the then Acting Chief Officer Ben Millington is shameful and reflective of Leadership's sick culture to suppress inconvenient facts.
47. As proud volunteers we are always ready to assist the community in times of trouble, disaster or for events of a significance to our community. In the past five years our Brigade has also provided assistance for floods, motor vehicle accidents, rescues, and storm damage totalling between 800 and 1000 hours. This is in addition to our fire callouts. We gladly do so and don't want thanks for doing so – we see it as the reason we joined the RFSQ – to serve our communities.
48. On most larger deployments and events the level of organisation by paid staff would be charitably described as shambolic with most clearly out of their depth and as a result poorly utilise the considerable volunteer time made selflessly available.
49. In terms of the 2032 Olympics and the response to larger deployments the properly trained and resourced NSW RFS is clearly superior and the RFSQ has much to learn from them.

Equipment

50. Introduce a uniform and equipment guarantee that all uniform orders shall be delivered within 30 business days of the order placement for standard issue items. The current system is a paper based difficult to use form that is a lottery of whether you will get what you ordered and is wildly variable between days and years as to when you receive it. We have had members waiting over 14 months for basic safety uniform such as fire boots.
51. Introduce an online uniform and consumable catalogue that is managed / picked / supplied by a contracted party as shown to be effective by Queensland Rail (SAP SRM). Current arrangements do not work. You should be able to add uniform to a cart, which will reconcile against yearly issue requirements and then remember what you ordered from the last time.
52. Require all rural fire appliances to be fitted with integrated electronic dispatch and information terminals. The ongoing usage of personal phones by volunteers to navigate to incidents is ludicrous and ineffective. There is no live link between appliance location, response status, incident command and the dispatching agency. NSW RFS has begun this fitment but there is no such intent within the RFSQ. RFS vehicles currently have it.
53. Brigades were issued a pair of tablets that were meant to assist with the growing administrative burden and were also meant to take these into the field to log incident data using the program Survey123. Inexplicably the tablets had any form of navigation function disabled and were not able to download the dispatch app (BART) used to communicate callouts. We were also refused in vehicle mounts for these tablets on the basis they were too large and would obscure vision. Our Brigade returned these tablets to the RFSQ as they were a joke. This tablet project is another example of impractical office based non field tested thinking that fails volunteers.
54. The RFSQ vehicles currently being provided are not fit for purpose, are over weight and with less water than their predecessors. The Fleet section responsible for this mess should be fired and the procurement process begun afresh with volunteer / volunteer association input leading to a prototype for testing leading to batch production. The design by committee and press the build button approach doesn't work.
55. With Ministerial attention, Mount Mee RFB has recently replaced its 2014 RFSQ dual cab Ford Ranger with a 2002 Nissan Patrol Utility that it refurbished through the Brigade's own detailed works program. The grossly overweight 2014 Ford Ranger cost \$2 in repairs per kilometre travelled and became a dangerous liability before finally suffering a catastrophic engine failure. We battled on with this liability even though we knew it was illegal to be on the road with an overloaded rear axle. When the Brigade Secretary took RFSQ to task over this and proposed to have the vehicle weighed at a commercial heavy vehicle weighbridge to settle the matter he received from the Acting Chief Officer a letter threatening to charge him with breaches of Workplace Health and Safety Legislation for perceived disobedience of a vague direction to wait until the vehicle was to be weighed by the same Fleet team who supplied the piece of junk.

56. We can supply this letter mentioned in 55.) via secure channels to the Inquiry if needed to highlight the woeful culture of denial, cover up and professional protection rackets run by some RFSQ paid staff. As of this submission, some 14 months after receipt of this letter, the Brigade's vehicles have yet to be weighed as so directed and virulently required by the Acting Chief Officer.
57. The RFSQ base vehicle should be a Toyota Landcruiser 79 series inline with other volunteer fire services around the country not the Ford "Danger Rangers" that have caused so much trouble. We believe that the Danger Rangers are another symptom of the "Kedron Emergency Services Complex" illness that would be cured by moving the RFSQ head quarters to a regional area. We rejected a new Ford Ranger based light attack over the older Patrol due to the Rangers not being fit for purpose in the terrain of our district when loaded to maximum rated capacity.
58. There needs to be a formal mechanism for a Brigade to refuse equipment on a 'not fit for purpose basis' without RFSQ leadership engaging in retribution and retaliation. The people on the ground are the ones using the equipment not the divorced from reality desk drivers in the Kedron Emergency Services Complex. Such a mechanism in terms of Mount Mee RFBs Ford Ranger based 41 would have quickly prevented \$50,000 of taxpayer money wasted on such a failure.

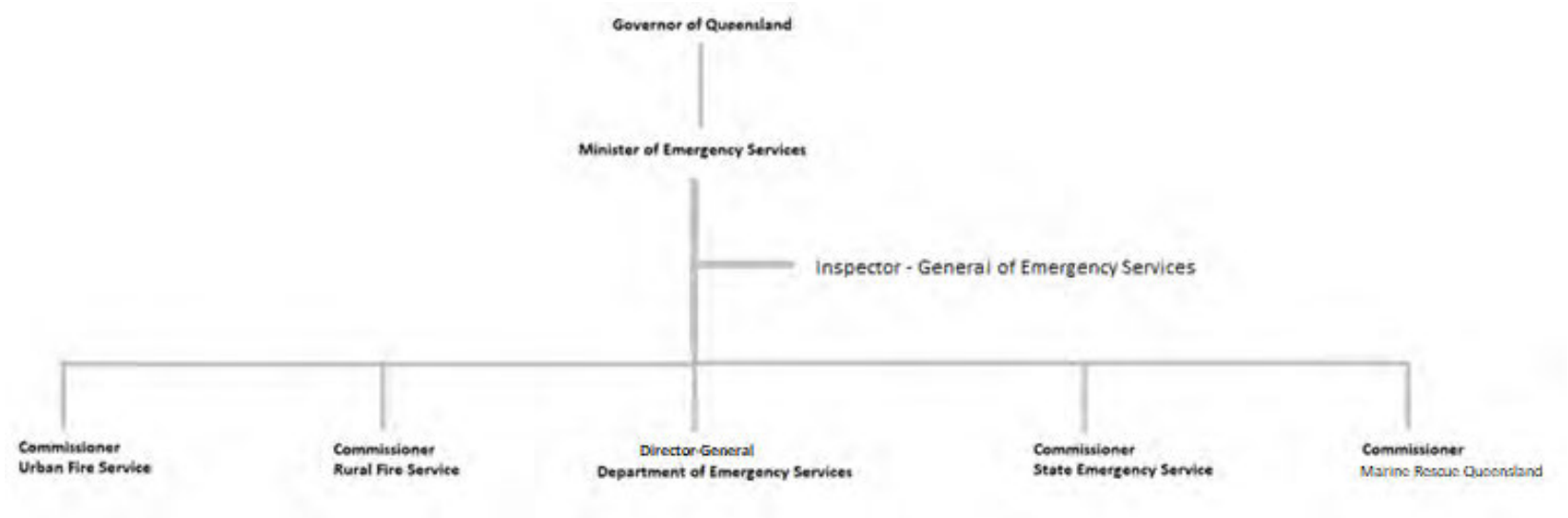
Volunteer support measures

59. As per other Australian volunteer fire services, Rural Fire Service Queensland volunteers should be able to receive training in and use Breathing Apparatus (BA). This comical restriction is only in place to appease the red trucks. Our Brigade returned the issued P3 smoke masks and equipment that were tried to be introduced from 2022 without consultation as ineffective and impractical and requested BA equipment. Our request was never responded to.
60. All RFS, SES and MRQ Officers to receive a minimal yearly tax free allowance paid fortnightly (ie \$100) to cover associated expenses for duties including:
- Currency of training (Incident control, breathing apparatus and first aid)
 - Currency of trainer qualifications (training and assessing)
 - Maintenance of uniforms and official event attendance
 - Fuel costs for attending briefings, meetings and skills maintenance.
61. All road crash rescue and breathing apparatus (BA) certified members of the RFS who maintain competency to receive a minimal yearly allowance paid fortnightly (ie \$70) to cover associated expenses.
62. Employers of emergency Service volunteers receive a 3 % State payroll tax deduction per concerned employee to offset unrestricted emergency service leave requirements.

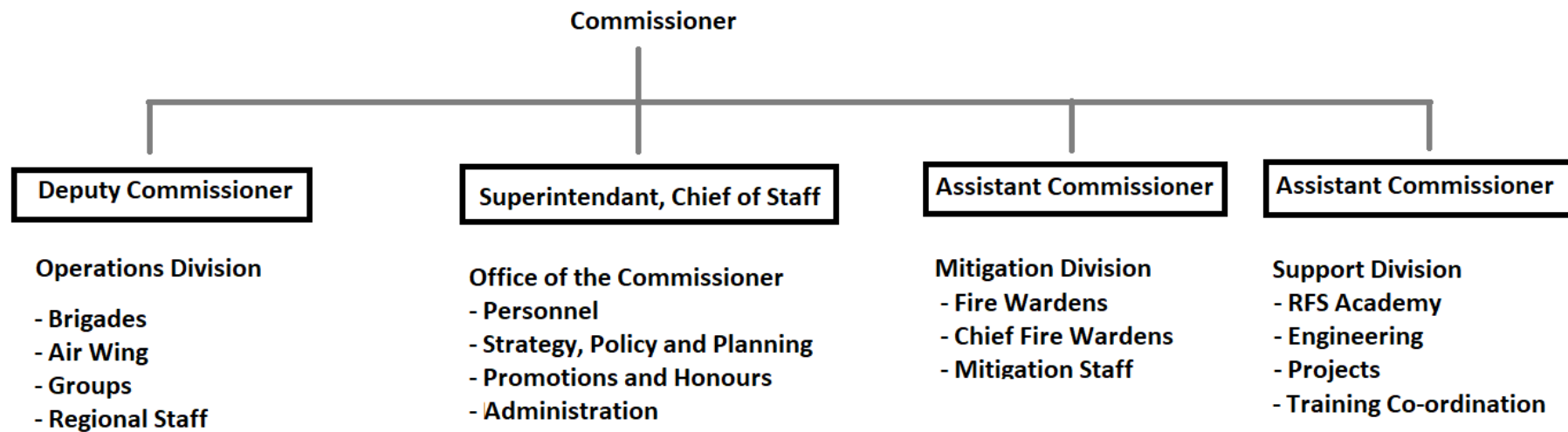
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Appendices

A: Emergency Services of QLD Structure



Rural Fire Service Queensland



Appendix C: Urban Fire Service localities of responsibilities

- Brisbane City Council – urban areas only excluding Moreton Island.
- Moreton Bay – urban areas only including Redcliffe, Caboolture , Bribie Island.
- Ipswich City Council urban areas
- Redland Bay – Cleveland excluding the southern Moreton Bay islands.
- Logan urban areas
- Gold Coast urban areas
- Sunshine Coast urban areas
- Gympie urban areas
- 11 Maryborough
- Hervey Bay
- Gladstone
- Bundaberg
- Rockhampton / Yeppoon
- Mackay
- Townsville
- Cairns
- Airlie Beach
- Toowoomba / Highfields
- Nambour
- Noosa

The exact boundaries between areas of Service responsibility should be managed by a committee chaired by the Inspector-General of Emergency Services and comprising Service Commissioners, association representatives and representatives of the Minister for Emergency Services and the Minister for Local Government.

Appendix D – Responsibilities

Incident type	UFS	RFS	DES	SES	MRQ
Structural Fires - urban	Lead	Support	N/A	Assist	N/A
Structural fires – rural	Support	Lead	N/A	Assist	Assist
Vegetation Fires response	Support	Lead	N/A	Assist	Assist
Flood and Storm response	Assist	Support	N/A	Lead	Assist
Flood and storm recovery	Assist	Support	N/A	Lead	Assist
Marine Rescue	N/A	Support – Air Wing only	N/A	Assist	Lead
Marine Search	N/A	Support – Air Wing only	N/A	Assist	Lead
Road Crash Rescue – urban	Lead	Support	N/A	Assist	N/A
Road Crash Rescue – rural	Support	Lead	N/A	Assist	N/A
Land Rescue	Support	Assist	N/A	Lead	N/A
Land Search	N/A	Support	N/A	Lead	N/A
Technical Rescue – urban	Lead	N/A	N/A	Support	N/A
Technical Rescue – rural	Assist	Support	N/A	Lead	Assist
HAZMAT – land	Lead	Assist	N/A	Assist	N/A
HAZMAT – marine	Support	Assist – Air Wing only	N/A	Assist	Lead
Land Search	Assist	Support	N/A	Lead	Assist
Investigation – Scientific	Assist	Assist	Lead – Scientific	Assist	Assist
Investigation – Forensic	Assist	Assist	Lead – Forensic	Assist	Assist
Humanitarian assistance	Support	Support	Lead - IG	Support	Support
Marine assistance	N/A	Support – Air Wing only	N/A	Assist	Lead
Marine fire fighting	Support	Support – Air Wing only	N/A	N/A	Lead
Vegetation fire mitigation	Assist	Lead	N/A	Support	Assist
Swift water rescue – urban	Lead	N/A	N/A	Support	Assist
Swift water rescue – rural	Support	Support	N/A	Lead	Assist
Incident co-ordination with SDCC	N/A	N/A	Lead – IG	N/A	N/A

Lead – This is the Lead Service for the category of incident and shall provide the Incident Controller, Operations Officer and the bulk of involved personnel.

Support – This Service shall directly support the Lead Service for the category of incident and shall provide, at immediate notice, additional personnel, equipment and / or material as requested by the Lead Service. Where a Support Service is first on scene they shall hand over control of the incident to the Lead Service at the earliest opportunity.

Assist – This Service shall assist either directly or indirectly the Lead and Support Service through short notice provision of bulk personal, equipment and capabilities as requested by the Lead Service for duties or purposes as agreed.

N/A – this type of incident is not applicable to the identified Service due to a complete disconnection with Service expected capabilities and / or location.

Appendix E – Rank structure

Rank Structure	Classification	UFS	RFS	DES	SES	MRQ	Description	Comment
Epaulette colour		Dark blue	Dark Blue	Light Blue	Dark Blue	Light blue	Epaulette base colour	
Symbol colour		Silver	Gold	Silver	Orange	Gold	Symbology colour	
Rank Wording		UFS	RFS	IG-ES, COMMS, SCIENTIFIC	SES	QCG	Wording at bottom of rank slide	
Inspector General of Emergency Services	Senior Ranks	N/A	N/A	Crown over crossed batons over wreathed QLD crest	N/A	N/A	Most senior emergency service uniformed member. Responsible for ensuring Services meet mission competence readiness and efficiency.	Replaces current civilian Inspector General of Emergency Management. Replaces current Commissioner of the QFD.
Commissioner		Crown over impellor over wreathed QLD crest	Crown over impellor over wreathed QLD crest	N/A	Crown over cyclone over wreathed QLD crest	Crown over propellor over wreathed QLD crest	Service Head	Replaces current chief officers and deputy commissioners
Deputy Commissioner		Crown over wreathed QLD crest	Crown over wreathed QLD crest	N/A	Crown over wreathed QLD crest	Crown over wreathed QLD crest	Field commander of the service operations	To provide clarity over responsibilities and commands
Assistant Commissioner		Wreathed QLD crest	Wreathed QLD crest	N/A	Wreathed QLD crest	Wreathed QLD crest	Commander of service support functions	
Superintendent	Officer Ranks	Crown over 1 impellor	Crown over 1 impellor	For scientific and communication functions only	Crown over 1 cyclone	Crown over 1 propellor	Regional / function commander	Replaces current assistant chief officers and assistant commissioners
Inspector		1 Crown	1 Crown	For scientific and communication functions only	1 Crown	1 Crown	District / group commander	Replaces Group Officer (RFS)
Captain		3 impellors	3 impellors	For scientific and communication functions only	3 cyclones	3 propellors	Brigade / unit commander	Replaces Commodore (QCG), First Officer (RFS)
First Lieutenant		2 impellors	2 impellors	For scientific and communication functions only	2 cyclones	2 propellors	Deputy brigade / unit commander Watch commander	Replaces Second Officer (RFS) and station officer (FRS) and deputy group officer (RFS)
Lieutenant		1 Impellor	1 Impellor	For scientific and communication functions only	1 cyclone	1 propellor	Brigade / unit / shift officer	Replaces Officer (RFS) and station officer (FRS)
Leading Member	Service Member Ranks	3 Chevrons Leading Firefighter	3 Chevrons Leading Firefighter	For scientific and communication functions only	3 Chevrons Leading Field Operator	3 Chevrons Coxswain	Crew / unit leader	Replaces crew leaders (RFS)
Senior Member		2 Chevrons Senior Firefighter	2 Chevrons Senior Firefighter	For scientific and communication functions only	2 Chevrons Senior Field Operator	2 Chevrons Senior Crew	Experienced service member	
Member		1 Chevron Firefighter	1 Chevron Firefighter	For scientific and communication functions only	1 Chevron Field Operator	1 Chevron Crew	Competent service member	
Trainee Member		Trainee Firefighter	Trainee Firefighter	N/A	Trainee Field Operator	Trainee Crew	Service member under training	

Revision History

Version	Date	Comment
0.1	13/12/24	Rough draft
0.2	12/02/25	Draft for management committee review
0.3	13/02/25	Revised draft for management committee review
0.4	15/02/25	Brigade review version
1.0	22/02/25	Version for Submission