

DEVON & SOMERSET FIRE & RESCUE AUTHORITY



REPORT REFERENCE NO.	HRMDC/10/11
MEETING	HUMAN RESOURCES MANAGEMENT & DEVELOPMENT COMMITTEE
DATE OF MEETING	17 JUNE 2010
SUBJECT OF REPORT	THE WORKING TIME DIRECTIVE AND PROPOSED CHANGES TO LEGISLATION
LEAD OFFICER	Director of People and Organisational Development
RECOMMENDATIONS	<p>(a) <i>That the Committee supports the stance taken by the LGA and that the County Councils, MPs, MEPs etc are lobbied accordingly;</i></p> <p>(b) <i>That the potential impact on DSFRS of changes in the opt out clause be noted;</i></p>
EXECUTIVE SUMMARY	The Working Time Directive and proposed changes to legislation will potentially impact on the flexibility of Devon and Somerset Fire and Rescue Service in terms of the availability of employees on the Retained Duty System (On-Call), and Wholetime employees who have secondary RDS contracts, and other employees who have secondary employment to support service delivery e.g. the Community Safety Action Team. This is largely due to the suggestion to remove the opt out clause relating to a maximum 48 hour working week, the definition of working time and compensatory rest.
RESOURCE IMPLICATIONS	Resource issues are not identifiable at the moment. An electronic availability system, Garten, will help provide this management Information required to assist this.
EQUALITY IMPACT ASSESSMENT	Employees on call are those disproportionately affected by the potential changes in legislation.
APPENDICES	<p>A. CFOA Consultation Response;</p> <p>B. FEU Consultation Response,</p> <p>C. Glossary of terms</p>
LIST OF BACKGROUND PAPERS	None

1. **BACKGROUND**

- 1.1 The UK FRS employ approximately 50,000 employees whose work includes responding to incidents 24 hours a day, such as fires, road traffic collisions, building collapse, hazmat, transport accidents, maritime response, international rescue, co-responding, mine rescue, flooding and water rescue.
- 1.2 There are basically two types of operational firefighters, whole-time, who work a set period of hours per week (though are able in many authorities to undertake secondary employment), and retained (retained duty system (RDS)) firefighters. These are firefighters that work and live up to approximately 5 minutes travel distance from their base station but whose primary employment is not normally with the FRS. They are on-call at least 80 hours a week, undertaking approximately 2/3 hours training per week, and respond to incidents when their base station are called out.
- 1.3 The FRS also employs senior officers who will work a flexible duty system, which is a normal (42hr) working week, but who, at set times, will be on call to take control of significant incidents when requested.
- 1.4 There are around 18,200 retained firefighters in the UK. 90% of fire cover in the UK is provided by retained firefighters, covering many urban and rural areas. Devon and Somerset Fire and Rescue Service is the largest UK employer of retained firefighters with over 2,700, staff operating that duty system
- 1.5 Currently, the UK has reached a political agreement with the European Union (EU) to retain its opt-out under the Working Time Directive 1993 (WTD), which means that employees can opt-out of the average maximum working hours limit of 48 hours. The deal is subject to approval by the European Parliament and implementation into UK law, and if adopted it will benefit both employers and employees who value flexibility in working hours. There is some debate, however, as to whether or not the opt-out provision will continue to apply to organisations such as the Fire and Rescue Service, Doctors etc.
- 1.6 The most significant proposals to amend the Directive were proposed by the European Commission in 2004. Discussions are taking place now, and if there is agreement, it may or may not lead to significant amendments to the Directive. The revision is contentious and the outcome has implications for UK local government (both for Fire and Rescue Service and for staff in residential care homes). If agreed it will have to be translated into our own domestic working time legislation (The Working Time Regulations 1998). The Local Government Association (LGA) is working on behalf of local authorities and fire and rescue authorities to ensure that the implications of the Directive's revisions are understood.
- 1.7 The key impact of the proposals in relation to the WTD is as follows:
 - The opt out
 - On call time
 - Compensatory rest.
- 1.8 Each of these areas is explored in more depth in this report, together with details in respect of action being taken by both EU, national and local government.

2. **THE OPT-OUT**

- 2.1 The Working Time Regulations 1998 allows the UK to retain its opt-out from the maximum 48-hour working week. Individual workers could decide to work beyond the 48 hour working week subject to other safeguards in the Directive (rest breaks, rest days, holidays etc). The maximum reference period for calculating average weekly working hours is six months. But, where an individual has opted- out, an upper limit of a 60-hour maximum week will apply, calculated as an average over three months. This means employers must keep working time records, even for opted-out workers.
- 2.2 The Directive also encourages employers to examine requests for changes to working hours and patterns in light of business needs and the need for flexibility on the part of both the employer and the worker. But what might this mean in practice?
- 2.3 It would appear to mean that the UK should implement a legal right on the part of all workers to request flexible working. As such, that would go beyond the extension to all staff with children under the age of 16 that was recently proposed and endorsed by the UK government came into effect in April 2009. Whether this right would mirror existing flexible working rights in terms of process and grounds for refusal, or whether it would be introduced as a more diluted "duty to consider" obligation, similar to requests to work beyond the normal retirement age, will be tested in Employment Tribunals
- 2.4 Staff will not be permitted to opt-out on commencement of employment unless they are to work less than 10 weeks per year. Those on probationary periods who opt-out may withdraw their consent at any time up to six months into employment.
- 2.5 There is currently some debate that the opt-out clause might be removed. The Commission and other Member States want it removed, believing it gives the UK a more competitive advantage over those EU member states that have not made use of the opt-out and because it believes there is evidence of abuse of the opt-out clause. If this were to be the case this would have significant impact on Devon and Somerset Fire and Rescue Service (DSFRS) which has the majority of its employees operating as part time firefighters on the Retained Duty System; having primary employment outside the Fire and Rescue Service.
- 2.6 The opt -out clause currently allows individuals to work over and above an average 48 hours week, if they choose to do so thereby offering availability in terms of a secondary employment contract to DSFRS.
- 2.7 The LGA supports the UK government view of retaining the opt-out.

3. **ON-CALL TIME**

- 3.1 Definition of working time is already a complex area of law. Currently, time spent on call at a workplace should be counted as working time, irrespective of whether the worker is called upon to actually perform any duties.
- 3.2 The EU deal proposes a new distinction between 'active' and 'inactive' on-call time. 'Active' on-call time would be time during which the worker is required to be at work, but is not required to perform any duties. This would count as working time for the purpose of calculating compliance with Working Time Directive limits.

- 3.3 'Inactive' on-call time would be, for example, time spent at home during which a worker is on-call, but not performing duties. This would only count as working time if national law or a collective agreement so provided, in which case the maximum average working week for opted-out staff would rise to 65 hours over a three-month period. In the absence of such a law, inactive on-call time would be neither working time nor rest time.
- 3.4 The proposed changes imposes further administrative burdens on employers such as Fire and Rescue Services that will need to separately record active and inactive on-call time. The European Court of Justice has interpreted the definition of working time to include all on-call time spent at the workplace, even when employees are actually resting. This has potential impact on a number of local government activities e.g. fire fighting and social care.
- 3.5 The LGA believes 'inactive' time should not be classed as working time.

4. **COMPENSATORY REST**

- 4.1 Under the Directive, an individual's rights to a rest period (e.g. the right to 11 hours daily rest between periods of work) can be amended, subject to the individual being granted a period of compensatory rest. The European Court of Justice has held that this rest must be granted immediately.
- 4.2 The LGA believes this provision must be more flexible to allow rest in a reasonable period, taking into account operational factors and staffing levels.

5. **EUROPEAN UNION (EU) AGREEMENT**

- 5.1 For amendments to be made to the Directive there has to be agreement between the Council of Ministers (EU member state governments) and the European Parliament (EP).
- 5.2 Over five years, there have been numerous proposals and counter proposals on each of these issues. It has been highly contentious between employers and trade unions and between political parties and member state governments. The main views are:
- 5.3 The Council of Ministers (national governments) agreed in June 2008 to:
- Retain the opt-out (subject to tighter conditions for the protection of workers);
 - Class inactive on-call time as neither working time or rest; and
 - Compensatory rest should be granted within a reasonable time.
- 5.4 The LGA supports the Council's position.
- The European Parliament proposed the following amendments in December 08:
 - The 48 hour opt-out should be phased out within three years;
 - On-call time in the workplace, even when inactive to be counted as working time;
 - Working hours in more than one job should be considered together; and
 - Compensatory rest should be taken immediately.

- 5.5 In March 2009 The Council and Parliament entered into a formal conciliation process to reach agreement on the final text. UKREP, UK government representation in Brussels, told the LGA that there would be a series of consultation phases. The Council has considered the EP amendments,
- 5.6 As conciliation failed because agreement could not be reached between the Council and the EP and because they also ran out of time as the EP came to the end of its mandate in June 09 prior to the European elections), the status quo remains. This is not a lasting solution but would mean the 48 hour opt-out remains for the time being, and ECJ case law on the definition of working time and the timing of compensatory rest would also remain.
- 5.7 The Commission may pursue infraction proceedings against Member States if they did not make the necessary amendments to their legislation and may come forward with another proposal on the 48 hour opt-out.
- 5.8 The EU reopened the consultation, with the initial phase ending on the 19th May 2010. Results of the consultation are unlikely to be known until the end of June 2010

6. **UK GOVERNMENT**

- 6.1 For the UK, BERR has overall responsibility for dealing with the Directive and Communities for Local Government (CLG) and Department of Health are also involved. The UK Government's absolute priority is to maintain the opt-out, which is what the LGA Group has always supported.
- 6.2 In the past, the UK government has been on its own in supporting the retention of the opt-out as initially it was the only state using it. However, a significant development has been that around 15 other EU countries have now used the opt-out in some form, so the Council's position on retaining the opt-out is likely to look much stronger. A recent meeting of the Federation of the European Union Fire Officer Association, (FEU). At the beginning of May 2010 in Finland has given further strength to this position (see Appendix B).
- 6.3 The UK government has also strongly supported the LGA line on the definition of working time and compensatory rest provisions. However, to maintain and build support for the retention of the opt-out, it could be that the UK government concedes on other elements of the Directive such as the definition of on-call time.
- 6.4 If this is the case, the LGA and UK government viewpoints would diverge, as its implications (on-call time and compensatory rest) could be significant for the local government workforce. Also, the UK government has been strongly supported on all of these issues by a number of other member states who may now find it difficult to maintain their agreed positions.

7. **CHIEF FIRE OFFICERS ASSOCIATION (CFOA)**

7.1 As a FRS our in road into the initial phase of the consultation between the EU and their social Partners (which includes employee and employer organisations) is via the Local Government Employers. It is CFOA's opinion that, if there is no agreement then the consultation will be spread more widely. CFOA believe that it is unlikely for the social partners to come to an agreement in the first phase. CFOA have collated all the consultation responses from individual fire and rescue services and hared them with the LGA in preparation for the second phase of consultation, so that all key opinion formers understand the issues for the fire and rescue service with the working time directive. CFOA's consultation response is at Appendix A.

8. **FEDERATION OF THE EUROPEAN UNION FIRE OFFICERS ASSOCIATION (FEU)**

8.1 In early May 2010 FEU met in Finland to discuss their position on the challenges of the Working Time Directive and its impact for the Fire and Rescue services and the Fire departments of the Member States. Appendix 2 shows the outcome of that meeting. 21 of the 27 member States of the European Union unanimously adopted the following position:

- seek the attention of Member States of the European Union regarding the risk of the substantially negative impact for the vast majority of fire services due to the revision of The Working Time Directive 2003/88/EC, in particular, the quality of the safety of European Citizens, the Impact on public finances, the failure to take into account the specific nature of civil protection, and the lack of understanding of the organizational framework and proper functioning of the fire services, (both professional and volunteers);
- would seek to emphasize the absolute necessity that the future directive maintains the quality of public service provided, by fire fighters, (volunteers and professionals), in conjunction with the legitimate interest that attaches to the preservation of their health and their safety in their work or their activity;
- would call in relation to this proposal, on national governments and the European Commission and Parliament responsible for the development of this directive:
- to preserve, through its clear exclusion from the scope of the Directive, the activity of a volunteer fire fighter, as distinct from the activities of a worker;
- to maintain, for the professional fire fighters, the flexibility in the calculation of weekly working time (opt-out) and to put in place a system that recognises the relationship between active operational duty time and inactive operational duty (standby) time 24hrs/day, 365 days a year.
- resolve to convey their position in a coordinated manner with national governments and EU (Commission, Parliament, Council), and mandated the representatives of the FEU to relay this position among the institutions of the European Union.

9. **LOCAL GOVERNMENT ACTIVITY**

9.1 The LGA has been lobbying on the Directive since 2004. Policy expertise is provided by Local Government Employers (LGE) who represents UK local government at the Employers Platform, a European network of local government employment experts.

- 9.2 This is part of CEMR (pan European LGA) and is the main local government lobbying mechanism on the Directive at EU level. It also works through CEEP, the European public sector employers body. The LGA European team has assisted the LGE with the provision of information and in its lobbying activity in the process.
- 9.3 A significant problem is that there is much misunderstanding of the impact of the Directive and proposals for change because:
- Even within the proposed amendments there is still scope for different interpretations of the impact;
 - All of the issues are interrelated which means that a change in one aspect
 - can have a knock-on effect on another; and
 - The actual impact will depend on the working arrangements of different
 - employers.
- 9.4 This makes it almost impossible to quantify the effects. CLG is in contact with the LGA Group to assess the impact of the EP's amendments on fire authorities (implications in terms of continuing to provide operational cover, including an idea of cost). It will use this in its communications to other national governments /MEPs.
- 9.5 Changes to the opt-out system or the calculation of on-call time could pose severe difficulties for UK fire and rescue services, because the fire service is not only staffed by full-time staff but also by "retained firefighters". As Members are aware these are people with a fulltime day job who also work part-time as a firefighter. Some fire and rescue authorities have been in contact with the LGA Group and one has reported that it has made permanent some of its retained staff and that it knows of other authorities undertaking cost benefit analyses if the opt-out were deleted.
- 9.6 The LGA issued a briefing for MPs which was cited during the Adjournment Debate on the European Working Time Directive on 11 February. The briefing set out the implications of the loss of the opt-out for fire and rescue authorities and can be accessed at: <http://www.lga.gov.uk/lga/core/page.do?pageld=1645875>
10. **KEY POINTS**
- 10.1 The UK currently still has the right to opt out of the maximum 48-hour working week, but this is subject to change and could impact on availability of staff who have secondary employment contracts with DSFRS.
- 10.2 Flexible working is encouraged, but isn't a legal right for all.
- 10.3 Correctly classifying 'on-call' time will be important as the law in this area is complicated.
- 10.4 The proposal is subject to scrutiny by the European Parliament and is unlikely to come into force until 2010.

11. **CONCLUSIONS AND NEXT STEPS**

- 11.1 The recent change in the EU presidency (from Slovenia to France) on 1 July 2008, and the fact that these proposals remain subject to the approval of the European Parliament, mean that their adoption is by no means a foregone conclusion. The UK has some flexibility in terms of how the changes are implemented, and will have a two-year window to do so. Therefore, any changes are unlikely to take effect before 2010.
- 11.2 DSFRS is currently assessing the impact of the changes in the legislation to the service, so that it can anticipate the likely effect in terms of cost and resourcing and identify solutions.
- 11.3 Following a meeting with the senior official in charge of drafting the amendments to the Directive (and for trying to get agreement by the two legislating bodies, the European Council and European Parliament), it is clear where compromise may happen and where issues are out of the scope for amendments. The 48 hour week for example is non-negotiable, as it is set by the International Labour Organisation, and is used for international comparisons on the quality of working lives. The area most likely to be compromised on is around the timing of compensatory rest.
- 11.4 DSFRS is currently involved in a procurement process for a Retained Duty availability system, "Garten" which will provide improved management information about availability of individuals, stations and areas and impact on resourcing and crewing levels. The intention is that this system will interface with the new Regional Control Centre. Regular updates on the Retained Duty System project will be given at future HRMD Committees.
- 11.5 LGE has also been approached by the Centre for Strategy & Evaluation Services (CSES) to discuss practical aspects of the impact assessment that the European Commission is carrying out around the Directive (CSES have been appointed to look at the impact of the opt-out across Europe and to look at the impact of the Directive on UK public services). Focus groups will be set up (through LGE, or in cooperation with other stakeholders) and we will contact you in due course as we are made aware of each phase of the impact assessment process.
- 11.6 The LGA will continue to work on behalf of UK local authorities to support the retention of the UK opt-out by contributing to decision making processes both in Whitehall and Brussels. Specifically they will:
- Lobby UK Government departments on local government views to inform their EU level negotiations;
 - Lobby MEP's on the conciliation committee (list of MEPs on the committee is available) and encourage the pan European network to do the same;
 - Carry out some cost benefit analyses On Fire and Rescue Services (and care homes);
 - Continue to keep local authorities informed about what the LGA Group is doing on our behalf; and;
 - Develop media awareness.

11.7 The Chief Fire Officers' Association will be supporting the stance of the LGA as indicated above. The Committee will be updated at future meetings as more information becomes available.

11.8 Key contacts are as follows:

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JANE SHERLOCK

Director of People and Organisational Development

CFOA CONSULTATION RESPONSE

Thank you for your responses to the Working Time Directive consultation request.

As you may be aware, the initial phase of consultation is between the Commission and their social partners. Our in-road to this consultation is through the Local Government Employers (LGE). If the social partners – which include employee and employer organisations – do not come to an agreement, the consultation will be spread more widely.

We believe it is unlikely that the social partners will come to an agreement in this first phase.

All your responses have been shared with the LGE to inform them of the issues. CFOAs response is noted below. We have also met – and will continue to meet - with officers within the LGE, informing them of the issues in more detail.

The information supplied by you is also being used to prepare a comprehensive consultation reply in preparedness for the second phase of consultation. This will be shared with you all prior to it being sent to the Commission.

We will be working with the LGA throughout this process to ensure that all key opinion formers understand the issues for the fire and rescue service with the working time directive.

CFOA Response:

The UK FRS employ approximately 50,000 personnel whose work includes responding to incidents 24 hours a day, such as fires, road traffic collisions, building collapse, hazmat, transport accidents, maritime response, international rescue, co-responding, mine rescue, flooding and water rescue.

There are basically two types of operational firefighters, whole-time, who work a set period of hours per week (though are able in many authorities to undertake secondary employment), and retained (retained duty system (RDS)) firefighters. These are firefighters that work and live up to approximately 5 minutes travel distance from their base station but whose primary employment is not normally with the FRS. They are on-call at least 80 hours a week, undertaking approximately 2/3 hours training per week, and respond to incidents when their base station are called out.

The FRS also employs senior officers who will work a flexible duty system, which is a normal (42hr) working week, but who, at set times, will be on call to take control of significant incidents when requested.

There are around 18,200 retained firefighters in the UK. 90% of fire cover in the UK is provided by retained firefighters, covering many urban and rural areas.

In response to the specific questions put forward by the LGE:

1. Do you think the Working Time Directive needs to be reviewed?

Though CFOA ordinarily believes all legislation should be periodically reviewed to ensure it continues to meet its purpose, the WTD has only recently gone through a review. We currently believe that the WTD is fit for purpose, well known and understood and has the balance of flexibility and protection for both employees and employers. The serious effect any changes will have on the effectiveness of the UK FRS lead us to believe, at this point in time, the WTD does not need to be reviewed.

2. Which points of the Working Time Directive are useful to you as an employer?

The Opt-out of the 48 hour working week enables the retained duty system to operate, ensures senior officer availability for significant incidents, and ensures flexibility of systems of work to provide an effective fire and rescue service targeting local risk.

Defined rest periods and compensatory rest options provides flexibility, specifically in relation to senior wholtime officers who provide on call cover, as well as press officers, IT staff etc, who also provide 24 hour on-call services.

3. Which points of the Working Time Directive cause difficulties to you as an employer?

There is difficulty that details relating to the hours worked in an employee's primary employment is not required to be disclosed.

4. If you could change anything about the Working Time Directive, what would it be and what alternative options would you propose?

See point 3
above

Also, further clarity around 'on-call' and working time, specifically where staff live on site, when on-call but not working (*Landeshaupstadt Kiel v Norbert Jaeger*, 2003, European Court of Justice).

I would firstly like to thank you again for providing feedback to LGE on the first stage consultation for the Working Time Directive.

FEU CONSULTATION RESPONSE

We were able to use your feedback to influence various texts that have been forwarded by European "social partner" organisations. I would like to update you on the current position:-

1. There are many similarities across Europe, on the impact of the working time directive on public sector employers. As providers of 24 hour services, the issues around inactive on-call time and compensatory rest are the same across all 27 Member States. In addition, there is a common position in terms of wanting to retain the opt-out.
2. Attached is a response which was forwarded by the organisation representing local and regional government employers at the local level. An initial draft was written by the Danish Regions employer organisation (who represent the health sector as well as the local government sector). Your feedback was instrumental in adding references on recent European Court of Justice (ECJ) cases which have re-interpreted the Working Time Directive for example around annual leave (both the Stringer case and rolled up holiday pay). These types of issues highlight further re-interpretation of the Directive from the original intentions.
3. The closing date for the consultation was 19 May. Most responses have now been forwarded to the European Commission. However, the three organisations that could decide to open negotiations on agreeing the Directive independently of the European Commission (the so called cross sectoral social partners CEEP, representing all public sector employers, Businesseurope, representing all private sector employers and ETUC, representing all trade unions) have asked for an extension. They are still considering whether to enter negotiations, CEEP are keen to enter negotiations, believing that as representatives of employers and employees they are better suited to come up with a workable solution. However, this is far from guaranteed as the Directive is such a political issue.
4. The results of the consultation are now unlikely to be issued until the end of June, and the next stage of the consultation (providing more practical insights as to the possible future Directive) not issued until after the summer break.
5. Following a meeting with the senior official in charge of drafting the amendments to the Directive (and for trying to get agreement by the two legislating bodies, the European Council and European Parliament), it is clear where compromise may happen and where issues are out of the scope for amendments. The 48 hour week for example is non-negotiable, as it is set by the International Labour Organisation, and is used for international comparisons on the quality of working lives. The area most likely to be compromised on is around the timing of compensatory rest.
6. LGE has also been approached by the Centre for Strategy & Evaluation Services (CSES) to discuss practical aspects of the impact assessment that the European Commission is carrying out around the Directive (CSES have been appointed to look at the impact of the opt-out across Europe and to look at the impact of the Directive on UK public services). Focus groups will be set up (sometime through LGE, sometimes in cooperation with other stakeholders) and we will contact you in due course as we are made aware of each phase of the impact assessment process.

If you have any questions please feel free to contact me.
FEU- MEETING - TAMPERE, FINLAND, 8-12 May 2010.
(*Federation of the European Union Fire Officer Associations*)

THE FEU POSITION ON THE CHALLENGES OF THE EUROPEAN WORK TIME DIRECTIVE AND ITS IMPACT FOR THE FIRE & RESCUE SERVICES AND THE FIRE DEPARTMENTS OF THE MEMBER STATES.

Meeting today in a general meeting in Tampere (Finland), members of the association FEU (Federation of the European Union Fire Officer Associations) have noted the statement issued by the European Commission 24 March 2010 inviting the representatives of workers and employers to express their views on the revision of Directive 2003/88/EC on working time.

After discussion, the member associations present, representing 21 of the 27 member states of the European Union, have unanimously adopted the position as follows.

The Member associations of FEU:

1. seek the attention of Member States of the European Union regarding the risk of the substantially negative impact for the vast majority of fire services due to the revision of The Working Time Directive 2003/88/EC, in particular, the quality of the safety of European Citizens, the Impact on public finances, the failure to take into account the specific nature of civil protection, and the lack of understanding of the organizational framework and proper functioning of the fire services, (both professional and volunteers)
2. would seek to emphasize the absolute necessity that the future directive maintains the quality of public service provided, by fire fighters, (volunteers and professionals), in conjunction with the legitimate interest that attaches to the preservation of their health and their safety in their work or their activity.
3. would call in relation to this proposal, on national governments and the European Commission and Parliament responsible for the development of this directive:
 - to preserve, through its clear exclusion from the scope of the Directive, the activity of a volunteer fire fighter, as distinct from the activities of a worker;
 - to maintain, for the professional fire fighters, the flexibility in the calculation of weekly working time (opt-out) and to put in place a system that recognises the relationship between active operational duty time and inactive operational duty (standby) time 24hrs/day, 365 days a year.
4. resolve to convey their position in a coordinated manner with national governments and EU (Commission, Parliament, Council), and mandated the representatives of the FEU to relay this position among the institutions of the European Union.

Agreed at Tampere, May 10, 2010.

Glossary

BERR	Department for Business, Enterprise and Regulatory Reform
CEEP	European Public Sector Employers Body
CEMR	Pan European LGA
CLG	Communities for Local Government
EP	European Parliament
EU	European Union
FEU	Federation of the European Union Fire Officers Association
LGA	Local Government Association
LGE	Local Government Employers
UKREP	UK Government Representation in Brussels
WTD	Working Time Directive