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Chair of the Fire and Rescue Authority  
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NWFRA/2024/0703  
Ask for: Lisa Allington

7 March 2024

Ms. J Rathbone  
Via email: [seneddequality@senedd.wales](mailto:seneddequality@senedd.wales)

Dear Ms. Rathbone,

**INQUIRY INTO FIRE AND RESCUE SERVICES (FRS)**

Thank you for your letter of 12 February 2024 regarding the above.

I trust that the Equality and Social Justice Committee will find the attached written submission helpful, and I look forward to attending with the Chief Fire Officer, Dawn Docx, to give my oral evidence on Monday 11 March 2024.

Yours sincerely,

A handwritten signature in black ink that reads 'Dylan Rees'.

**Cllr Dylan Rees**  
Chair of the North Wales Fire and Rescue Authority

**1. The extent governance arrangements contributed to the failings identified in the South Wales Fire and Rescue Service culture review.**

1.1 In examining the “governance arrangements” it may be useful to determine where these start and finish with a devolved function such as Fire and Rescue Services (FRS). The Welsh Government has much closer access to the issues affecting the Welsh Fire and Rescue Services than the Home Office in England. Governance arrangements include for example:

- The Welsh Ministers’ overall responsibility for fire and rescue policy and performance (including producing the National Fire and Rescue Framework and monitoring compliance);
- The Welsh Government’s responsibility for the legal and regulatory framework applied to Fire and Rescue Authorities (for firefighting, prevention, and fire safety but also whistleblowing, public reporting, openness and accountability.)
- Funding arrangements and sources;
- The role of the Chief Fire and Rescue Advisor in advising Welsh Government;
- The role of external audit (Audit Wales and the Auditor General);
- The Fire Authority. Both the members of the Fire Authority but also the officers of the Fire Authority, the Clerk and Treasurer. The Standards Committee and the Independent Remuneration panel for Wales;
- The Chief Fire Officer and Deputy Chief Fire Officer; and
- The Fire and Rescue Service’s internal management structure, decision making and reporting arrangements.

1.2 With regards to the failings identified in the South Wales Fire and Rescue Service (SWFRS) Independent Culture Review. The opinions of the Review team and their recommendations for the future are recorded in the report. As a sector we are alert to the problem and committed to improving matters. Committee members will no doubt be familiar with the contents of the SWFRS Independent Cultural Review and will have read paragraphs (329 to 332) that specifically relate to this subject of governance and the view of the Review Team, “...that there are sufficient legal structures in place for effective governance of the Service in relation to issues of culture”.

1.3 The Commissioners should be allowed sufficient time and space to implement the recommendations and to draw their own conclusions as regards South Wales Fire and Rescue Authority’s (SWFRA) internal governance arrangements without adding any more layers of complexity to the situation.

**2. The capacity and capability of Fire and Rescue Authorities to change existing management structures and practices that have been identified as potential areas of concern, and their willingness to deliver cultural change.**

2.1 It is not immediately obvious whether this question is referring to the South Wales Fire and Rescue Authority or South Wales Fire and Rescue Service.

2.2 North Wales Fire and Rescue Authority (the Authority) has a simple structure of Authority itself which meets four times a year, and two sub committees - the Executive Panel (half the Members of the Authority) and the Audit Committee (the other half of the Authority) which scrutinises the work of the Executive Panel. In addition, there is the Standards Committee made up of two Authority Members and four appointed Members. The only officers employed by the Authority are the Treasurer and the Clerk. In order to ensure independence, both the Treasurer and the Clerk are external appointments and are not employed by the Fire and Rescue Service.

- 2.3 The South Wales Independent Cultural Review relates to South Wales Fire and Rescue Authority and not to the sector as a whole. If there is an unwillingness to change, this has not been reflected in North Wales. From the appointment of the new Chief Fire Officer in 2021, the Authority has enthusiastically supported her desire to improve North Wales Fire and Rescue Service (the Service) and the culture. To that end, Members supported the findings of the Chief Fire Officer when she reported to them after visiting every station, crew and department in her first 100 days. Similarly, they supported the need for an independent cultural survey to be undertaken in September 2021 to provide a baseline assessment of the existing culture. Following this, an action plan was created to improve the culture of the Service. The progress made over 24 months was reassessed with another independent cultural survey in September 2023 and reported back to Authority Members at a Members Culture Seminar in February 2024.
- 2.4 With regard to other challenges faced by the Service, Member led working groups on budget scrutiny, developing the environmental strategy, training provision and Emergency Cover Review (ECR) have been meeting and examining evidence for the whole of 2023. The Authority held a substantial public consultation from July to September 2023 to hear the views of the public around changes to the location of firefighting resources to improve daytime availability (ECR) which is the real crisis facing rural fire and rescue services and appetite for a reduction in increase in the budget. The public's views and those of other stakeholders were taken into account when making a decision about the ECR and budget setting for 2024/25.
- 2.5 Although the willingness is there, the capacity is in short supply. The Authority employs two external officers and although the Service employs 910 people, 465 of those are Retained Duty System (RDS) firefighters who have other primary employment and respond from work or home when called to an emergency. On any week day the Service has in addition to station-based staff, 10 flexi duty whole time operational officers and 6 Control Operators in work, all who are fully occupied in Service delivery.
- 2.6 Capability is also an issue. The Fire and Rescue sector has tried to address this by combining expertise in organisational development (OD) and providing information and OD products through the National Fire Chiefs' Council (NFCC).
- 2.7 In North Wales the Service has implemented a number of measures aimed at steering the organisation on a long-term course towards cultural improvement; for example:
- Commissioning an outside party (Safecall) to provide a confidential hotline service to allow staff to report inappropriate behaviour without fear of retribution;
  - In 2022 appointing a dedicated Equality, Diversity and Inclusion (EDI) Officer. A subject matter expert from outside the Service. He chairs an EDI working group with a remit to identify systemic discrimination and recommend changes to address it through to the EDI Committee chaired by the Deputy Chief Fire Officer;
  - The development of the staff networks. These are the Fire Pride network, Carers network, Neurodiversity network, Women in the Fire Service network and Race, Ethnicity and Cultural Heritage (REACH) network. Each staff network is supported by a sponsor from the Service Leadership Team (SLT) to promote and champion their work;
  - Developed the concept of Siop Siarad which facilitates free discussion between employees and members of the HR and communication teams.
  - Conducted two independent cultural survey's in which staff have the opportunity to anonymously share their feelings around the culture and leadership of the Service.

2.8 Following conversations between Chief Fire Officer Dawn Docx, Chair of NWFRA Dylan Rees, Deputy Minister Hannah Blythyn, Director of Risk, Resilience and Community Safety Liz Lalley and other Officers from Welsh Government, NWFRS understands that there is a desire to provide further independent reassurance and confirmation to government, communities and citizens across Wales. A proposal has been agreed where the intention is to bring together the outputs from NWFRS's action plans to address cultural issues highlighted by:

- HMICFRS Spotlight Report (March 2023)
- Independent Cultural Survey of NWFRS published in October 2023
- Recommendations from the SWFRS report
- NFCC Maturity model

In addition to qualitative information from:

- The Staff Networks
- ED&I Steering Committee
- Siop Siarad
- Independent complaints line (Safecall) and Exit interviews

2.9 A board, "The Staff Culture Engagement Forum" will be established with representation from the Service Leadership Team, the Fire Authority, the Standards Committee, the Fire Brigades Union and an external specialist in the field of Organisational Culture. Their role will be to provide scrutiny, challenge and external knowledge, to review the progress the Service has made.

2.10 It is too simplistic to think that an organisation's culture is directly controllable by adjusting some aspect of "governance arrangements" or through structural change. Attitudes and behaviours are often deep rooted. It takes time to foster 'good' ethical attitudes and behaviours.

### **3. The failure of previous attempts at reform including exploring the barriers that prevented implementation of previous reviews, specifically the Commission of Public Service Governance and Delivery, which called for the reconstitution of the FRAs**

3.1 This question appears to suggest that there were barriers to reform, rather than the case was not evidenced nor strong enough to warrant reform. The reform which was suggested in 2014 was rejected on several fronts not just by the FRAs. It should be remembered that reform of FRS' in Wales took place in 1996 when eight Services became three and the Combination Order provided for a pooled budget to fund FRS' across a number of Local Authorities. It has worked exceptionally well for a long time with regards to getting results; the sustained long-term decline in fires, reducing by half since responsibility for Fire and Rescue was devolved in 2005 and the reduction in deaths and injuries due to accidental dwelling fires.

3.2 No better alternative appears to have been proposed. Additional research mirroring "A comparative study of governance changes on the perceptions of accountability in Fire and Rescue Services in England" by Katarzyna Lakoma in 2023, should be undertaken in the Welsh context. She notes too that there has been only limited academic attention given to the governance of FRS' in the UK.

- 3.3 Any reform which seeks to broaden the role of the FRS' and their governance arrangements must assess the impact across the whole of Welsh Government as the existing governance arrangements have many strands, as illustrated in the answer to question 1 above.
- 4. How the Welsh Government's 2018 consultation on reform of the Fire and Rescue Services has shaped current governance arrangements and working practices. The extent to which Welsh Government acted on concerns identified through this consultation and its 2019 progress report.**
- 4.1 Following the consultation in 2018, it might have been expected that Welsh Government would have incorporated any proposed changes to the governance arrangements into its manifesto and then into the Programme for Government Wales 2021 to 2026. Following which it would form part of the next edition of the National Framework for Fire and Rescue Services (Wales). However there has been no new National Framework in Wales since 2016.
- 4.2 In 2020, the Deputy Minister spoke of her vision for ensuring that the necessary funding and governance mechanisms would be put in place to support broadening the role of firefighters. Until this has been agreed and secured it is very difficult for FRAs to unilaterally introduce broadening the role.
- 4.3 If the aspiration for Firefighters to assist Health is not feasible then emphasis should be placed on their current statutory duties; fire safety, risk reduction, water rescue and operational preparedness. With the revision to the arrangements for civil contingencies more emphasis should be placed on the part that rural RDS firefighters can play in their community providing a hub for civil resilience as isolated communities have to deal with the impact of climate change and disruption to supply chains.
- 5. The changes needed to strengthen current arrangements for inspection and audit, including the role of external bodies including the Auditor General for Wales.**
- 5.1 Current arrangements for auditing of statutory accounts and assessing value for money is undertaken by Audit Wales at a cost of £72,000 p.a. for NWFRS.
- 5.2 The role of the Chief Fire and Rescue Advisor and Inspector for Wales is limited to "The manner in which fire and rescue authorities (in Wales) are discharging their functions and technical matters relating to those functions" Any expansion to this role would require additional resources as this is a part-time role, supported by a fulltime member of staff who manages and delivers the programme of fire safety inspections in Crown premises. Despite this single -point-of failure it is unclear from where resources can be released to undertake wider responsibilities.
- 5.3 In England, funding is provided by the Home Office to enhance the existing His Majesty's Inspectorate of Policing so that it would have the capacity to inspect Fire and Rescue Services, becoming His Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) in 2017. In addition to the number of full-time employees, the HMICFRS also relies on a significant number of officers seconded from the Fire and Rescue sector to undertake its inspection programme.

- 5.4 Despite having a “people” pillar in its original inspection programme it could be argued that the cultural challenges that we are aware of within Fire and Rescue Services did not come to light through the original inspections and therefore required a thematic review into the subject matter in 2023. Even if the remit of the HMICFRS was extended to include Welsh Fire and Rescue Services, capacity remains a challenge. Without additional funding there would be a need to remove employees from front line service delivery to produce the evidence and prepare for the inspections.
- 5.5 The Committee may also wish to note that FRAs are not unusual in not having any specific legal duty to routinely review its own culture.
- 6. The effectiveness of mechanisms for ensuring that evidence collected through inspections and reviews of FRSs by the Chief Fire Adviser and Inspector for Wales is used and acted upon and the arrangements for shared learning of FRSs undertaken in other nations, specifically in England, to inform policy.**
- 6.1 As stated above the Chief Fire and Rescue Adviser and Inspector for Wales (CFRAIW) role is a part-time position with a prescribed remit and little access to the machinery that is part of the Inspection regime in England and Scotland. However, the benefit associated with working as an inspectorate in a smaller jurisdiction, focused on only three fire and rescue services (in contrast to the 45 in England) enables the inspector to build up a detailed picture of performance and make associated judgements and recommendations set within a Welsh context. It is important that CFRAIW actively monitors examples of good practice outside Wales in order to encourage adoption within Wales, where appropriate.
- 6.2 The FRS are all part of the National Fire Chiefs’ Council (NFCC) and have access to the tools and standards that are developed for the whole of the UK. Benchmarking and gap analysis are regularly undertaken in relation to recommendations from UK inquiries, an excellent example being the progress being made against the recommendations from the Manchester Arena Inquiry, which is being monitored across the three emergency services in Wales through the Joint Emergency Services Group (JESG). Looking forward, an area of concern is the proposed College of Fire funded by the Home Office which has the potential to exclude Welsh Fire and Rescue Services from NFCC products and learning.