

1. Introduction

1.1 The National Fire Chiefs Council (NFCC) is pleased to submit written evidence to the Senedd's Equality and Social Justice Committee Inquiry into Fire and Rescue Services (FRS). This evidence should be considered alongside the oral evidence provided to the inquiry by NFCC Chair Mark Hardingham on 4th March 2024.

2. Background

2.1 NFCC is an independent membership association comprised of a council of Chief Fire Officers and is the professional voice of the UK FRS. Our overarching aim is to lead, support and coordinate prevention, protection, resilience and emergency response across FRS so that they can meet changing demands and keep communities safe. NFCC has a unique role in representing FRS at a national level and leads on driving improvement and development throughout FRS, while supporting strong leadership – including for the devolved administrations.

2.2 The Chair of NFCC acts as the first point of contact for the Home Office, fire professionals, and partners such as the Local Government Association or the Association of Police and Crime Commissioners. NFCC represents fire and rescue in a range of Government and sector forums and the Chair is the first line of advice to ministers in England during major incidents. The NFCC context is slightly different in Wales in that the Welsh fire services are all members of the NFCC but the role of advising Welsh Government, unlike in England, does not fall to the NFCC Chair but instead to a separate Welsh Fire Adviser and Inspector.

3. FRS Culture

3.1 The NFCC has a clear and stated view that the culture in fire and rescue services, and the way misconduct is handled needs to improve, and to improve quickly. NFCC has published a clear organisational culture statement that is available here: [NFCC-Organisational-Culture-Statement.pdf](#)

3.2 The statement sets out that the NFCC believe that everyone deserves to work in safe environments that are free from bullying, harassment and discrimination, abuse and harm, where they feel supported, welcome and able to thrive. This, in turn, enables the NFCC to support fire and rescue services to provide the best possible service to the public – services that are inclusive, professional and inspire confidence and trust.

4. The extent governance arrangements contributed to the failings identified in the SWFRS culture review.

4.1 NFCC has played no role in the governance arrangements of SWFRS and therefore is not able to comment in detail or directly on what extent the arrangements have contributed to the failings identified in the SWFRS culture review. Further, NFCC is not sighted on the discussions that have taken place in Wales in this respect at either Fire and Rescue Authority (FRA) or Welsh Government level.

4.2 However, on governance in general its importance cannot be overstated, and corporate failings will always have a link to governance. Whilst NFCC does not have a preferred type of governance it must be good governance in accordance with the widely acknowledged CIPFA/SOLACE established seven principles of good governance and the political governance should operate effectively with the Chief Fire Officer (CFO) and senior leadership teams.

4.3 NFCC believe CFOs are best placed to manage the operational running of services, recognising that this can only be done effectively with appropriate political oversight through a democratic mandate, good governance, accountability, and robust political decision-making in place.

4.4 Good governance includes the important role of scrutiny, and having arrangements in place that reflect the high standard communities expect for an important public safety service.

4.5 The Local Government Association (LGA) have published guidance called *Leading the Sector – Oversight of FRS performance*. This includes guidance on scrutiny which relies on the following conditions being in place:

- responsibility for performance oversight must be clearly assigned;
- FRA members must have a positive attitude towards scrutiny;
- senior officers must have a positive attitude towards scrutiny;
- arrangements for effective work programming must be in place;
- those undertaking scrutiny must have access to a range of reliable information from a variety of sources; and
- those undertaking scrutiny must have access to the knowledge and skills necessary to do so effectively

4.6 By way of comparison, nationally (UK), fire governance is not one single model of governance. Combined fire authorities, county council fire authorities (with different delegation frameworks), Police, Fire and Crime

Commissioners (PFCCs), different Mayoral models—all have different decision-making approaches, different delegations to officers (and cabinet members where appropriate), and different scrutiny requirements and practices.

4.7 Under whichever model an FRS is governed, there is the necessity to be accountable to the public and the public rightly expect the highest level of service and standards. The role of governance is set out in the Wales Fire and Rescue National Framework 2016, and it will be a matter for Welsh Government if this needs to be reviewed.

5. The capacity and capability of FRAs to change the existing management structures and practices that have been identified as potential areas of concern, and their willingness to deliver cultural change.

5.1 NFCC is not sighted on the discussions that have taken place in Wales at either FRA or Welsh Government level so is not able to comment in detail or directly on the capacity and capability of FRAs to change the existing management structures and practices or their willingness to do so.

5.2 As set out previously, the role of the FRA is clearly set out in the Wales Fire and Rescue Service National Framework 2016, and it is a matter for Welsh Government if this needs to be reviewed to strengthen these arrangements to reflect the intent in this aspect of the review.

6. 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 FRAs.

6.1 NFCC has not been involved in the work following previous reviews and is not sighted on the detail of the outcomes following the previous attempts to reform the sector and was not involved in the reform agenda in Wales, therefore is not able to comment directly or in detail.

6.2 NFCC however note that the Commission made the recommendation (Recommendation 16) that the Chief Fire Officer (CFO) should be legally responsible for planning, managing and delivering fire and rescue services, in a similar way as a chief constable is responsible for policing.

6.3 NFCC concur with this recommendation. Unlike in policing, CFOs at present do not have operational independence. By comparison, in policing the Chief

Constable is operationally independent, as outlined in [The Policing Protocol Order 2023 \(legislation.gov.uk\)](#).

6.4 NFCC believe CFOs are best placed to manage the operational running of services, recognising that this can only be done effectively with appropriate political oversight through a democratic mandate, good governance, accountability, and robust political decision-making in place.

6.5 This is a matter currently being developed within the Home Office and for English fire and rescue services following the recent FRS White Paper consultation and is potentially an area for a shared approach across English and Welsh FRS/FRA.

7. How the Welsh Government's 2018 consultation on reform of 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.

7.1 NFCC has not been involved in the work following previous reviews and is not sighted on the detail of the outcomes on how the Welsh Government's 2018 consultation on reform of Fire and Rescue Services has shaped current governance arrangements and working practices.

7.2 NFCC responded to the 2018 consultation and a copy of our response is here: [Reform of fire and rescue authorities in Wales | GOV.WALES](#) (Response number 56).

8. The changes needed to strengthen current arrangements for inspection and audit, including the role of external bodies including the Auditor General for Wales.

8.1 The inspection and audit of FRS and FRAs is a matter for Welsh Government and any associated bodies. Furthermore, whilst there are inspection models in place for English and Scottish FRS, namely His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) and His Majesty's Fire Service Inspectorate in Scotland (HMFSI), governance arrangements are not inspected as a matter of course.

8.2 However, on inspection and audit in general, these play an important part of the governance and assurance of FRS performance in the vital role they provide to the public. Both are an important part of good governance.

8.3 It must be noted that the extent of the role and effectiveness of inspection and audit will be directly linked to the capacity and capability of the respective functions and the level of resource they have to hand to enable them to inspect and audit the breadth of FRS functions.

8.4 In English FRS, HMICFRS have a rolling programme of inspections of all aspects of every fire and rescue service against a detailed inspection methodology that sets out what good looks like. English FRS are currently being inspected for the third time since 2018. Alongside the rolling inspections, HMICFRS have undertaken a thematic inspection of 'Values and Culture in Fire and Rescue Services' (published 30 March 2023) and are in the process of undertaking a further thematic misconduct inspection, with the report and findings due to be published later this year (Summer 2024).

9. 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 from inspections of FRSs undertaken in other UK nations, specifically in England, to inform policy.

9.1 How the work of the Fire Adviser is acted upon, and the extent to which learning from elsewhere in the UK is applied in Wales, is a matter for Welsh FRS bodies.

9.2 From a shared learning perspective, NFCC is in a unique position in that it can harness the knowledge and expertise across the country, including drawing from international practice, and bringing it together for the benefit of all and to share learning.

9.3 NFCC provides products, tools, guidance, training and services to all members, which includes FRS in the devolved administrations. All Welsh FRS are active members of the NFCC and have access to all the products, tools and guidance NFCC produce which they can use as they deem necessary and appropriate.

9.4 Further, all Welsh FRSs can receive direct help from the NFCC Implementation Support Team. The role of the Implementation Support Team is to help FRS in their improvement activities by:

- Raising awareness of NFCC guidance, products, tools and Fire Standards (for England).
- Mapping gaps in FRS provision to NFCC products and standards.

- Helping to understand and embed products and standards by developing. implementation toolkits and providing workshops and training.
- Signposting to best practice across the sector (The Positive Practice Portal).
- Providing feedback to NFCC colleagues about products including recognised benefits, barriers to implementation, and further support required.

NFCC Positive Practice Portal

The Positive Practice Portal can be used by Fire and Rescue Services who are interested in interventions that support communities, colleagues, and partners in keeping everyone safe and secure.

The Portal provides details about interventions, which have been developed by one or more FRS to address a particular need, concern or organisational change recognised by the NFCC or HMICFRS as an innovative or positive practice. These practices are in different functional areas and may include operational and non-operational responses, business practices and good ideas.

Many of the practices have already been included in a [HMICFRS inspection report](#) and all will receive further analysis from the new NFCC Organisational Learning team.

NFCC encourage all members of the FRS community to share examples of promising and new or innovative practice with us, as well as examples of interventions that didn't work.