

Agenda – Equality and Social Justice Committee

Meeting Venue:	For further information contact:
Committee Room 3 (Senedd)	Rhys Morgan
Meeting date: 18 March 2024	Committee Clerk
Meeting time: 13.30	0300 200 6565
	SeneddEquality@senedd.wales

Pre-meeting registration (13:15 – 13:30)

The Committee agreed on 11 March 2024, in accordance with Standing Order 17.42 (vi), to exclude the public from item 1 of this meeting.

1 The public health approach to preventing Gender Based Violence: Advisory group meeting

(13:30–14:30)

(Pages 1 – 12)

Break (14:30–14:45)

2 Introductions, apologies, substitutions and declarations of interest

(14:45)

3 Governance of Fire and Rescue Services: panel seven

(14:45–15:30)

(Pages 13 – 29)

Jason Killens, Chief Executive Officer, Welsh Ambulance Services NHS Trust

Angela Lewis, Director of People and Culture, Welsh Ambulance Services NHS Trust



4 Papers to note

(15:30)

4.1 National Energy Action Cymru briefing: Fuel Poverty in Wales

(Pages 30 – 34)

5 Motion under SO17.42 (vi) and (ix) to exclude the public from the remainder of today's meeting

(15:30)

6 Governance of Fire and Rescue Services: consideration of evidence and next steps

(15:30–16:10)

(Pages 35 – 80)

7 The EU Settlement Scheme: updated statistics

(16:10–16:15)

(To Follow)

MA JH/0471/24

Jenny Rathbone MS
Chair of the Equality and Social Justice committee

26 February 2024

Dear colleagues

Inquiry into a public health approach to preventing gender-based violence: publication of report.

I am writing to provide the Welsh Government's response to your Committee's report. Firstly, I very much welcome your focus on this subject; as you so aptly put it in your title, we must 'all play our part', and I welcome the broad thrust of your conclusions which support a public health approach to tackle the causes as well as the effects of gender-based violence. I share your conclusion that 'the critical context for gender-based violence is gender inequality and cultural norms of men as powerholders, decision makers and leaders at societal level, in the work-place and in families'. If we are to tackle these issues, we need a whole society approach particularly through engagement with men and boys. This is the approach we have adopted within our National Strategy, which we are delivering through our National Partnership Board and VAWDASV Blueprint. I regard your report as an endorsement of our overall approach, but there are always areas for improvement and issues where we should challenge ourselves to do better and your recommendations are a valuable contribution in this regard. I will respond to each of your recommendations in turn.

Recommendation 1. *The Welsh Government should adopt a whole-of-government approach and work with partners across public services, the private and third sectors to promote gender equality and inclusivity in Wales. To help to achieve this it should implement a 'gender equality test' which assesses the impact of all policy decisions and legislative proposals on gender equality with the aim of reducing gender disparities. The gender equality test should be introduced as soon as feasibly possible and should be applied to all Welsh Government decisions from December 2024 onwards at the latest.*

Accept:

The Welsh Government recognises the importance of ensuring that all policy is integrated to achieve our policy objectives through as many interventions as possible, particularly in the context of the public health principles which underpin our approach. I believe that ensuring

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

effective use of the Integrated Impact Assessment (IIA) is the right way to ensure an effective approach, although I also recognise that there is room for improvement in the application of both IIA and Regulatory Impact Assessment. That is why I have commissioned a review of the assessment of gender as a protected characteristic within the IIA. I believe that we can accommodate the principle of this recommendation and achieve its purpose within the review and a revised IIA process and that this would be more effective than creating an additional mechanism.

Welsh Government's Equality and Human Rights Division is currently undertaking a review of our approach to Equality Impact Assessment, which will produce a new template, guidance and support. This work began at the end of 2023 and will run through 2024, alongside ongoing review of the wider Integrated Impact Assessment process.

The Equality Team has engaged with officials across the organisation in three workshops and, following on from this, will work with departmental equality leads to draft a new template, taking into account questions linked to all of the protected characteristics of the Equality Act 2010.

Sex is a protected characteristic and the assessment of impact on gender is considered within the Equality Impact Assessment.

We are focused on the mainstreaming of equality, which along with the gender policy team, includes gender mainstreaming.

I will report the progress of the review to the Committee within the timetable set out in the recommendation.

You also suggested a further action in support of this recommendation to achieve the objective of a whole government approach:

Action 1. The Welsh Government should ensure all equality plans address gender disparities, challenge stereotypes and foster a culture of respect and equality. It should work with partners on detailed actions it will take in the short, medium and longer-term to improve public awareness about gender issues, promote women in leadership, and enforce rights that guarantee equality and freedom from discrimination, harassment and violence. An update on these actions should be provided to the Senedd in Plenary within six months of the Senedd debate for this report and annually thereafter.

I am happy to report on this action through the VAWDASV Annual Report and the Annual VAWDSV Blueprint updates. I would also point to our transparency mechanism for the Gender plan. Officials provide progress updates including an annual progress report to the Gender Equality Forum (GEF) members. The GEF advises on equality issues across Wales and brings together internal and external stakeholders working on gender equality issues across Wales. The membership, terms of reference and minutes are published on the Welsh Government website.

[Gender Equality Forum | GOV.WALES](#)

Recommendation 2. *The Welsh Government should embrace its role as an innovator and leader in applying a public health approach to gender-based violence, by:*

- *identifying opportunities to raise awareness and generate shared understanding of the approach and Blueprint;*
- *contributing to the evidence base of what works by proactively publishing progress updates and resources used to underpin the Blueprint;*

Accept:

On behalf of all partners within the Blueprint, Welsh Government is leading on the development of a VAWDASV Communication plan which builds on effective campaigns such as [Sound](#) and also sets out how progress of the National Partnership Board and its constituent workstreams will be communicated to stakeholders. The Board has been presented in January with a draft outline of the Communication Plan, which included contributions from Policing in Wales who undertook a stakeholder engagement analysis for the Blueprint. The Communication Plan and tools to further generate a shared understanding of the Blueprint will be finalised by the end of March 2024.

Within our wider plan, there is a commitment to publish progress reports against the VAWDASV Blueprint High Level plan on an annual basis. In addition, we will be enhancing the Welsh Government VAWDASV web pages to publish other documents which are relevant and informative for our stakeholders. We will ensure that these include the progress updates and signposting to resources, as the Committee recommends.

You have suggested a further action in support of this recommendation:

Action 2. To further aid transparency, we look forward to seeing the workplans and membership details of each of the Blueprint workstreams published and that the Minister has committed to publishing. We will write to the Welsh Government in March 2024 to coincide with the end of the financial year to hold it to account for these commitments.

We have published the high-level action plans. I am happy to further commit to publish the terms of reference, which includes membership, for the Partnership Board and each of its workstreams. We will ensure the Committee receives a copy of the published information when it is available and within this timescale.

Recommendation 3. *The Welsh Government should set out how the development and evaluation of policies which address the intersectionality of GBV will be informed by data, evidence, and analysis. In particular the Welsh Government should provide the Equality, Race and Disability Evidence Units with clarity regarding their priorities and agree timescales for completion of key milestones by end of April 2024. The response should include details of:*

- *the target date for completing the work to establish baseline data and a summary of the baseline indicators it intends to use;*
- *the partners it will work with to gather baseline data and the target date by which data-gathering efforts will be mainstreamed; and*
- *when it anticipates the data gathered by the Units will be able to meaningfully contribute to policy development and evaluation.*
- *continuing to prioritise work with the next generation through effective programmes aimed at children and young people.*

Accept:

Policy and Knowledge and Analytical Services officials from VAWDASV and Equalities teams have met to ensure there is synergy and collaboration across both policy areas in relation to addressing the intersectionality of GBV. This includes activity at a strategic level and collaboration across research agendas. Work is underway to identify ways to ensure that the lived experience of people with multiple areas of vulnerability is captured and informs policy development.

Analytical plans are being developed to meet wider evidence needs. This includes identifying global best practice and reviewing support pathways for disabled survivors of VAWDASV. Welsh Government are assisting the blueprint streams to embed awareness of the importance of intersectionality in all aspects of GBV, and within this activity an ability to monitor and evaluate the process.

A task and finish group has been set up to build on the work undertaken in 2019 in relation to the VAWDASV national indicators, which had been paused due to the pandemic. Welsh Government colleagues from policy teams, Knowledge and Analytical Services and the National Advisers for VAWDASV are currently reviewing the indicators adopted in 2019.

A mapping exercise is underway to identify sources of data best suited to inform the individual indicators. While this work is progressing well, there are a number of challenges in respect of using UK data disaggregated to a national level. The intention is that the mapping exercise and draft national indicator set with associated data, will create an effective platform for joint working with other stakeholders.

Knowledge and Analytical Services work closely with the Equality, Race and Disability Evidence Units and have already been sharing knowledge where work may intersect. For example, the on-going data and indicator mapping for the Anti-Racist Wales Action Plan evaluation framework which is seeking to bring together existing indicator frameworks across a range of portfolio areas in Welsh Government.

You have suggested the following action in support of this recommendation:

Action 3. The Welsh Government should set out the timelines for the creation of the Central Repository and how the repository will support collaboration, knowledge sharing and facilitate research. In particular, the Welsh Government should identify opportunities for researching interventions that engage men and boys specifically in order to add to the evidence base on this issue.

The plan to create a repository has had to be revised due to resource restrictions and the importance of focusing available resources on front line services during a cost-of-living crisis. Whilst original plans anticipated a staffed institution, the work to develop the repository is now focused on creating 'virtual' networks of the knowledge management capacity across the sector. This work is expected to be completed during this calendar year. In the shorter term we have recognised the need to support the evidence needs of the blueprint and have been working to develop and implement an evidence plan across the VAWDASV national strategy. This initial work will be completed by the end of March this year. Overall, this revised approach represents a robust alternative to the repository previously envisaged, which will benefit from being embedded within the wider work of the Evidence Units.

Recommendation 4. The Welsh Government should take urgent action to ensure that fast-tracked, specific and specialised therapeutic services are available for all babies, children and young people who experience or witness gender-based violence and provide details of these in response to this report. This action should include:

- details of how the Welsh Government is enforcing the rights of babies, children and young people who have experienced or witnessed violence to access fast-tracked, specialised therapeutic services;*
- reviewing the availability of therapeutic services for children and young people who witness or experience violence, and how well these are integrated into the broader health and education system.*

This work should involve all relevant stakeholders (including the police, CAFCASS and local authority social services) and be progressed at pace with an update provided to the Senedd in the autumn term of 2024.

Accept:

The Welsh Government as part of its Transformation Programme for Children's Services is developing a National Practice Framework. The Framework will be the first set of national standards for children's services in Wales, sitting alongside other All-Wales procedures like

the All-Wales safeguarding procedures. Its aim is to further strengthen and support the translation of policy intent into daily practice.

The Framework has been developed through working with partners to review and strengthen quality and practice to improve service delivery. The standards will reflect a multi-agency approach, as we recognise children who need help and protection often need the support of a number of professionals who work together as a team. The standards will better describe how services for children work driving greater transparency. Working is underway to finalise the first 6 new standards by the end of March 2024 with the others being co-produced by the end of 2024.

The first six new standards will be:

- The Child-inclusive practice standard;
- The Trusted Adults standard;
- Eyes on the child: the Child Safeguarding standard;
- The Missing children and young people standard;
- The Continuing Care standard;
- The Manageable workloads standard.

In addition, I would acknowledge that gaps in support for children and young people are likely to exist within survivor support services themselves. I am happy to commit undertaking a review of provision in this area and to reporting early findings to the Senedd within the timescale indicated.

The Welsh Government is currently consulting on a new, all age Mental Health and Wellbeing Strategy and a Suicide and Self-Harm Prevention Strategy. These strategies set out our vision and priorities for mental health, wellbeing and for suicide and self-harm prevention. A fundamental focus of the new Mental Health and Wellbeing Strategy is delivering a connected system of support across health, social care, third sector and wider, where people can access the right service, at the right time, and in the right place.

Care and support will be person-centred, compassionate and recovery-focused, with an emphasis on improving quality, safety and access. People impacted by violence, domestic abuse, sexual violence and assault are identified in the Mental Health and Wellbeing Strategy as an under-served group. During the consultation, there will be specific engagement with those with lived experience.

You have suggested a further action in support of this recommendation:

Action 4. Some of the particular challenges faced by migrant women were set out in our report: 'Gender based violence: The needs of migrant women'. We will be requesting an update to the recommendations and conclusions of that report in Spring 2024.

I am happy to commit to providing the update within the timescale indicated.

Recommendation 5. *The Welsh Government should request that Estyn's Chief Inspector of Education and Training in Wales undertakes a national thematic review of healthy relationships in schools. The review should be included in the next available programme of thematic reviews and completed within the usual timescales.*

The review should:

- *include views and recommendations on the sufficiency of resources and training for teaching healthy relationships;*
- *seek to verify whether there is any link between a lack of provision and higher levels of deprivation; and*
- *identify best practice with regards to 'whole school approaches' to preventing GBV.*

Accept:

The last thematic review into Healthy relationships was in 2017. With the new curriculum making healthy relationships education mandatory as part of Relationships and sexuality education, this would be a good opportunity to review practice and impact at an early stage of implementation. Conversations have already taken place with the Chief Inspector who is happy to commit to a review of the nature set out by the Committee.

In addition; [The Peer on Peer Sexual Harassment Plan](#), published on 24th January 2024, sets out the actions Welsh Government and partners will take to prevent and respond to the issue of peer-on-peer sexual harassment and harmful sexual behaviour ([HSB](#)) in education settings. The Plan has been developed and refined by engagement with a range of partners, across sectors. This includes education, local government, Police and the third sector.

We look forward to continuing these conversations as we move into delivery of the Plan. It is this spirit of partnership that will ensure we can ensure all our learners have access to a safe learning environment.

Recommendation 6. *The Welsh Government must take immediate action to ensure that teachers are reminded of the mandatory reporting duty placed on them in relation to FGM. Longer-term, the Welsh Government should work with Estyn on establishing monitoring arrangements and safeguards to provide assurance that teachers are aware of their legal duties in relation to preventing GBV. The work to establish these monitoring safeguards should be completed by September 2024.*

Accept:

We will write to schools to reinforce the importance of reporting incidence of FGM. Estyn inspectors will continue to evaluate whether all school staff are clear about their responsibilities and what they need to do to protect pupils, including 'PREVENT' duties. The strengthened inspection framework and inspection guidance also sees a review of the professional learning offer in schools and PRUs to assess how well teachers are supported in responding to issues of gender-based violence female genital mutilation. Estyn are also rolling out workforce skills training to the whole inspection workforce, to ensure all inspectors are equipped with skills and knowledge on responding to safeguarding issues.

You have suggested a further action in support of this recommendation:

Action 5. *The Minister for Education should write to higher education institutions in Wales to remind them of the Welsh Government's expectations and direct the Commission for Tertiary Education and Research to work with universities to agree actions which strengthen preventative approaches across the sector.*

I have asked the Minister for Education to write in the way that is suggested.

Recommendation 7. *The Welsh Government should require its newly established Advisory Panel for Digital Resilience to agree its priorities and forward work programme at pace and publish these by the end of April 2024. The Panel should clarify which areas it will prioritise, estimated timescales for sequencing of its forward work programme and how it will address the significant areas of non-devolved policy and legislation relating to digital and online regulation.*

Accept in Principle:

Whilst I am very comfortable with the purpose of this recommendation I would like to consult the Panel about their role, purpose and work programme in light of this recommendation.

In addition, we have a programme of work in this area which addresses issues the Committee raises.

From a Digital Resilience in Education perspective, our information, guidance and support on online image abuse and sextortion is focussed on young learners, practitioners and parents and carers. Welsh Government holds the firm belief that safeguarding is everybody's responsibility and have called for social media platforms to recognise their responsibility and duty of care to social media users of all ages.

It is critical that we hold social media platforms to account and the Welsh Government is fully supportive of introducing clear and consistent standards across social media platforms to improve user safety.

The Internet Watch Foundation (IWF) report that in the first 6 months of 2023, they received more reports involving 'sextortion' than in the whole of 2022. Older teens (14 – 17 years old) are the most at risk, with boys apparently being targeted most often.

We welcome the intentions set out in the UK Government's Online Safety Bill (which received Royal Assent on 26 October 2023) in seeking to address illegal and harmful content online, with the aim of preventing harm to individuals in the United Kingdom.

The Welsh Government is committed to collaborating with UK-wide partners and other governments to take coordinated actions to meet our common aims to enhance online safety provision, policy and practice.

[Reporting Harmful Content](#) is a national reporting centre that has been designed to assist everyone in reporting harmful content online.

Within the Hwb [Keeping Safe Online](#) pages, there is a range of advice and guidance for parents and carers, children and young people and practitioners on topics such as advice for children and young people:

[Online issues and worries: online body image and self esteem - Hwb \(gov.wales\)](#)

[Online issues and worries: online sexual harassment - Hwb \(gov.wales\)](#)

[Online issues and worries: sharing nudes - Hwb \(gov.wales\)](#)

Last month, we published a "Views from the Experts" article by the Internet Watch Foundation (IWF) on sextortion (sexually coerced extortion) which may be useful; [Sextortion: sexually coerced extortion - Hwb \(gov.wales\)](#)

Recommendation 8. *The Welsh Government should work with health bodies to enhance the ability of healthcare professionals to identify and respond to GBV. To give effect to this recommendation the Welsh Government should:*

- *extend the Ask and Act duty to other health and social care professionals and issue revised guidance to GPs in the first instance;*
- *track and publicly report statistics on the participation of staff in training programmes;*
- *collate and publish statistics on the timeliness of response times (between disclosure and being seen by a specialist) to Ask and Act referrals;*
- *and clearly outline the methodology for measuring the impact of training initiatives.*

This work should be completed by March 2025.

Accept:

In accepting this recommendation, I should stress that participation in Ask and Act is not as a result of a duty. Instead, the VAWDASV (Wales) Act 2015 establishes the power for Welsh Ministers to issue statutory guidance and for Local Health Boards and Local Authorities to produce local strategies. Ask and Act results from this guidance and its application can be guided by those local strategies. The Sustainable Whole Systems Approach workstream of our National Partnership Board is reviewing the current guidance

and regional arrangements as part of its work plan. This review and the revised guidance that will follow can take on board the principles of this recommendation to ensure that health and social care professionals and GPs fully participate in training.

Following the review of Ask and Act, completed in 2022, from January 2023 we extended the opportunity for a wider range of VAWDASV professionals that do not fall under statutory roles to take part in Ask and Act training. Of course, the statutory bodies already covered included Local Health Boards and NHS Trusts.

The 2022 review found that Ask and Act was 'seen by those who participated in the evaluation as an important and valuable programme which is having an impact across Wales.' I do acknowledge the value of publishing additional data which would allow further scrutiny and accountability of the effectiveness of the programme. I am happy for this to be addressed through our ongoing development of the National Training Framework and recognise the timescale recommended by the Committee.

Recommendation 9. *The Welsh Government should establish a seventh workstream within the VAWDASV Blueprint whose mission will be to make ambitious recommendations on how businesses and organisations can create safer and more equal workplaces. The workstream should cover practical information on the policies, procedures and training necessary to support this aim. The group should operate in a spirit of social partnership with representation from employers and trade unions*

Accept in Principle:

The Committee will be pleased to note progress has been made in this area. Whilst I am happy to address the issues raised by the Committee, we do have a mechanism which can successfully address them in our well-established Workplace workstream which is co-chaired by a Chief Superintendent from Gwent Police, on behalf of Policing in Wales, and the General Secretary of Wales TUC. I shall therefore refer the Committee's findings and recommendations to the existing workstream for their consideration in support of the objectives set out in your report.

Recommendation 10. *The Welsh Government should consider funding a nation-wide public awareness campaign with a top male, sporting role model who can inspire other men and boys to take a stand against violence and promote positive values and behaviours. It is important this person is well-informed about the issue and receives appropriate training to effectively communicate and advocate for change. An evaluation of impact should be undertaken at the end of the campaign.*

Accept:

We are committed to using public awareness campaigns of the type mentioned as part of our strategy to engage with men and boys to address gender inequality, misogyny and the culture of 'toxic masculinity' which is promoted in some quarters but does not represent all men. We are engaged with the FAW and WRU to ensure that sport plays its part in the whole society approach we are undertaking. The recent findings of institutional sexism highlighted within the WRU, while being of deep concern, do provide an opportunity in the evident commitment of the WRU to turn these matters around. We will take advantage of that commitment to make a contribution which extends beyond Rugby itself.

However, in our work with communications and social media experts such as Cowshed, with whom Welsh Government is contracted to deliver campaigns of this type, we have identified that, among those who carry influence with young people, role models from outside the world of traditional sports carry significant weight. (e.g. gaming, trades and industry, music). For this reason, our next round of campaigns may well focus on other areas, as we focus on achieving the greatest possible impact.

As an example of our approach, I would point to the [Sound](#) campaign which I regard as a significant success. This campaign, which works with young men and boys in a number of settings, has proved to have considerable reach. The evaluation done so far has shown that the key messages and content reached a huge proportion of the target demographic during the campaign period (327,000 men aged 18-34, in Wales, during July-September 2023.) The campaign achieved this by targeting said demographic through segmentation of their interests, locations, language, education and professions. Content that focused on very specific areas of interest, or relatability, proved extremely effective and gave a more receptive 'in' to an often-difficult to engage topic.

We will continue to target and evaluate our campaign work in the way the Committee suggests, relying on the very practical expertise that specialists bring to our approach.

Recommendation 11. *The Welsh Government perpetrator workstream should undertake a rapid review of perpetrator programmes designed to prevent GBV that are available across Wales. The review should seek to provide assurance that each programme considers the safety of survivors and can evidence effective rehabilitation. It should also consider different cultural and contextual factors that can influence the effectiveness of perpetrator programmes and be completed by June 2024.*

Accept:

I welcome this recommendation and share the Committee's eagerness to improve our response to perpetrators as a means of reducing GBV. We have already begun an exercise which matches the purpose of this recommendation, through our Blueprint Tackling Perpetration Workstream. We launched a Wales wide survey in December 2024, which closed on Feb 9th 2025. This exercise gathered information about all existing perpetrator services currently being delivered across Wales. It includes information relating to eligibility criteria, risk levels, accreditation, victim safety and type of delivery model.

The findings of the survey, which will identify gaps in service delivery, and thematic trends, will be reported to the National Partnership Board in July 2025. This work will continue through the Tackling Perpetration Delivery Plan and the Sustainable Whole System Approach workstream to drive and support evidence based, needs led, commissioned services, that will recognise specific cultural needs as the Blueprint model progresses. This recommendation has been drawn to the attention of workstream members for their support in ensuring that the recommendation is met. An update will be included in the Blueprint annual report.

Recommendation 12. *All Members of the Senedd should commit to completing training on GBV prevention by the end of 2024. Alongside this commitment, Senedd Member Support Staff and Senedd Commission staff should be encouraged via the appropriate channels to participate in such training.*

This should be sought from a best practice provider and seek to address cultural norms and practices that perpetuate GBV whilst respecting cultural diversity.

Whilst I very much support the principle of extending understanding of GBV to all as we must 'all play our part', it would, of course, be inappropriate for the Welsh Government to respond on behalf of the Senedd in this regard. I assume you have referred this recommendation to the appropriate authority.

Action 8: *The Welsh Government should work with local authorities and/or the Welsh Local Government Association to ensure that local councillors have access to similar training and resources aimed at tackling GBV and report back by the end of 2024.*

I am happy to commit to discussing the matter with the WLGA with a view to this action being delivered.

There were two further actions set out in your report.
Pack Page 9

Action 6. The Welsh Government should publish the results of its bystander intervention initiative as soon as possible after completion.

I am happy to commit to this action.

and

Action 7. The Welsh Government should report back on its work with Public Health Wales to consider whether a specific approach to alcohol abuse is necessary, and whether they intend to commission any research or data collection to better understand the relationship between alcohol and GBV given the gap in the evidence base. An update should be provided to the Senedd in the autumn term of 2024.

I would point the Committee to the “Good Practice Framework for Violence Against Women, Domestic Abuse, Sexual Violence and Substance Misuse” [good-practice-framework-for-violence-against-women-domestic-abuse-sexual-violence-and-substance-misuse.pdf \(gov.wales\)](https://gov.wales/good-practice-framework-for-violence-against-women-domestic-abuse-sexual-violence-and-substance-misuse.pdf) which was published in 2018, but I am happy to ensure that the Welsh Government will discuss this further with Public Health Wales and consider what action is required and provide an update to the committee in due course”.

I hope this response demonstrates my commitment to work effectively with others and as I told the Committee during your evidence sessions, ‘we will learn together’. Once again, I thank you for your important contribution to our shared endeavour to make Wales the safest place in Europe to be a woman or a girl.

A handwritten signature in black ink that reads "Jane Hutt". The signature is written in a cursive style with a large initial 'J' and a distinct 'H'.

Jane Hutt AS/MS
Gweinidog Cyfiawnder Cymdeithasol a'r Prif Chwip
Minister for Social Justice and Chief Whip

Document is Restricted

March 2024

Introduction

1. The Welsh Ambulance Services NHS Trust welcomes the opportunity to provide evidence to the Equality and Social Justice Committee to support its inquiry into Fire and Rescue Services (FRS) in Wales. This evidence responds to the Terms of Reference outlined by the committee and focuses particularly on the inquiry elements detailed below:
 - The extent governance arrangements contributed to the failings identified in the SWFRS culture review.
 - 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.
 - 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.

2. In responding, the Welsh Ambulance Services NHS Trust can reflect only on its own experience and learning, recognising that it is not familiar with the detail of the governance and culture of fire and rescue services, beyond what is outlined in the recently published review into the South Wales Fire and Rescue Service. The Welsh Ambulance Services NHS Trust is an NHS organisation and, therefore, its governance arrangements are wholly different from those of fire and rescue services. It is in this spirit that this evidence submission is made.

3. The Welsh Ambulance Services NHS Trust (WAST) provides healthcare services for people across Wales, delivering high quality and patient-led clinical care, wherever and whenever needed. WAST attends more than 250,000 emergency calls a year, more than 50,000 urgent calls and transports more than 1.3 million non-emergency patients to some 200 treatment centres throughout Wales and England. Its dedicated people are the organisation's biggest asset, comprising around 4000 employees and 1000 volunteers. WAST is also the provider of the national 111 service.

Welsh Ambulance Service: Culture and Cultural Reform

4. Following an externally facilitated cultural audit and an initial survey that explored the climate of sexual safety in the autumn of 2022, the Welsh Ambulance Service has committed to cultural reform, leadership development and improving psychological safety across the organisation.
5. The audit and survey confirmed that, in line with many other organisations, the Welsh Ambulance Service has work to do to ensure its workplace culture is one in which everyone is able to thrive. It is acknowledged that poor behaviour may have been tolerated in the past, but is not, nor ever has been, acceptable.
6. In order to bring staff along on a journey of cultural reform, it is important to focus on education and support, pro-actively addressing poor behaviour where there is clear harm but looking to achieve a genuine cultural shift which is not predicated on fear of retribution, but on reflection and learning. Processes and policies were already in place to investigate concerns raised, but it was clear that the absence of a safe to speak up culture which includes a lack of trust from

affected colleagues, was having a silencing effect. From listening to affected colleagues, the organisation has learned and understood that dominant social norms have normalised discriminatory behaviour masked as banter, perpetuated by the strong sense of identity and belonging present in ambulance service culture that can create fear of social rejection.

Creating Space, Building Trust & Listening

7. The Welsh Ambulance Service has responded to that cultural audit through a commitment to empowering and amplifying the voices of lived experience, achieved through the launch of an employee-led network (inclusive of students and volunteers).

8. The purpose of the network and appointment of advocates is to embrace survivor leadership, enable a learning approach to change throughout what is a geographically dispersed organisation, better understand and remove barriers to speaking up, identify harmful power imbalances, signpost to appropriate support, and provide a safe space for colleagues to be seen and heard. More broadly, the WAST Voices Network represents a range of different perspectives, experiences, harnesses the spirit of inclusion and plays a key role in the move towards cultural maturity.

Organisational Learning and Approach

9. In recognising the impact that certain incidents may have had on individuals, a sincere and unreserved apology has been extended by the Trust Board. In so doing, the intention is not to be defensive but to genuinely acknowledge and learn from these experiences. This acknowledgment is a crucial step in fostering a culture of trust and collaboration within WAST. By taking ownership of organisational shortcomings and committing to continuous improvement, the aim is to build a workplace where everyone feels secure, respected, and

supported. This journey of introspection and accountability is a vital aspect of the broader efforts to create a workplace that is not only safe but truly inclusive and empathetic, as clearly demonstrated in the Trust's People and Culture Plan.

10. Drawing on ideas for improvement shared through the survey and nudge science, the WAST Voices Network and Organisational Development Team have introduced a range of different interventions, including a new Freedom to Speak Up process (including an anonymous reporting platform), reverse mentoring (connecting senior leaders with lived experience), Empowerment Pairs (mentoring to support colleagues experiencing imposter syndrome and improving confidence), the development of sexual safety guiding principles, a poster campaign, the launch of a podcast which delves into societal themes and their link to the workplace, hosting regular guest speaker events, the delivery of bespoke learning sessions that include active bystander training and facilitating topical group discussions at all new colleague welcome events.
11. It is also recognised that these interventions do not just apply to improving the climate of sexual safety, but also support the organisation's efforts to improve the working environment of all staff, foster improved relationships between managers and staff and improve employee satisfaction and staff retention. It is recognised that this is a long-term process and that this cultural shift will take a significant length of time.

Governance and Accountability

12. The WAST Board and Executive Leadership Team (ELT) have been fully informed and supportive of this work and were key in commissioning the listening exercise conducted in 2021 that surfaced issues within the service of bullying and harassment. The recommendations from that report lead to the sexual

safety survey and ELT was fully briefed from an early stage in relation to the significant themes arising.

13. The approach to creating space for listening and being guided by those affected by the issues has ensured open communication channels and ownership of issues with the service. Over the course of the last three years, this has shaped the Board development programme, ensured frequent discussion at a senior level, and the development of cultural metrics, both qualitative and quantitative, to demonstrate meaningful culture change. There was a conscious decision to move away from establishing a discrete and concrete action plan devised by senior leaders, but to engage in a dynamic process co-created with our Voices Network.

14. The cultural metrics and themes have multiple appropriate reporting mechanisms. The People and Culture Committee receives quarterly updates on the themes, amongst other people and culture metrics; the Chief Executive, Non-Executive Director lead for people and culture and the Director for People and Culture, receive quarterly Guardian reports. ELT has monthly updates on cultural metrics, alternating between quantitative and qualitative each month and including measures looking at EDI issues, recruitment, employee relations and absence for example.

15. The pivotal role of our Chief Executive and the unanimous endorsement from the Trust Board have been instrumental in driving a commitment to improving the organisation's culture. Senior leaders have taken a bold stance in championing this cause and their unwavering support is not merely symbolic; it is a tangible expression of the organisation's commitment to cultural transformation. Recognising the need for open and candid discussions, podcasts have been developed, focussing on conversations about sexual safety

featuring directors, fostering an environment where insights and learning can flow freely.

16. As part of the speaking up culture, the Chief Executive, lead Freedom to Speak Up Safely Non-Executive Director (NED) and Director of People and Culture receive a verbal and written update directly from the lead Guardian about key themes and patterns of reporting through the various routes to speak up. This is a key National Guardian's Office (NGO) recommendation and also a key recommendation from other cultural reviews to ensure senior leaders are aware of themes. In addition, the Director for People and Culture also has monthly conversations with the CEO to discuss themes that arise from EDI, Culture and People Services teams.

17. The Trust's People and Culture Committee has a keen focus on issues of culture, receiving regular reports and conducting deep dives on culturally related issues in order that Committee members, and the wider Board, can scrutinise work in this area and seek the relevant assurance.

18. The removal of traditional hierarchies and boundaries underscores the Trust's commitment to listening and learning from every level of the organisation. This approach has facilitated a more inclusive and collaborative atmosphere, allowing for the exchange of ideas and experiences without fear of retribution. The endorsement of the Trust Board is not just a top-down directive; it is a collective and genuine commitment to driving positive change. The Board's active involvement in dismantling barriers and fostering open communication reflects the organisation's ethos of shared responsibility and collaborative leadership in pursuit of a safer and more inclusive workplace.

19. The Welsh Ambulance Service's Executive Leadership Team, Board and People and Culture Committee all hold space for discussion, support and learning, particularly in relation to areas where they may be unaffected. The lived experience presentations and case studies from colleagues and service users are carefully considered with rationale as to the impact on the person presenting, including consent and recognition of the potential power imbalance and any detriment in participating; and careful recording of outcome and follow up. The NGO mantra of Speak Up, Listen Up, Follow Up provides a useful framework.

Broader Learning

20. Owning the problem in its entirety, no matter how uncomfortable that has been, was WAST's starting point for change. Organisations that have previously committed to 'stamping out' such behaviour have failed, as demonstrated in the [Casey](#), [Afzal](#) and [Atherton](#) reports. Cultural awakenings are continuing to take place across different industries and sectors, largely driven by Generation Z (people born between 1997-2012) activism. A healthcare contextual factor also influencing how awareness is raised throughout the organisation, is a belief that shifting attitudes will have a positive impact on patient care and the overall [gender health gap](#) in Wales.

21. The Trust has been open and transparent throughout the journey so far and took a proactive approach with the media to demonstrate our commitment to positive change, working with [BBC Wales](#) to highlight this work in August 2023. The organisation has been recognised by an extensive range of external stakeholders including the Health and Care Professions Council (HCPC), the College of Paramedics, and the Association of Ambulance Chief Executives as leading the sector with the approach and commitment to future-proofing the

Welsh Ambulance Service's culture by taking full ownership of the past and present.

22. WAST is committed to an ambulance sector-wide approach to [Reducing Misogyny & Improving Sexual Safety](#). The Association of Ambulance Chief Executives recently provided oral evidence and submitted [written evidence](#) which highlights increasing concerns, to a UK Parliamentary call for submissions.

Conclusion

23. The Welsh Ambulance Service's key learning has been about owning the findings and apologising to those affected, the importance of leadership in all areas of the organisation, engagement in discussions, reflection and creating space, but above all listening and accepting that, as an organisation, there is some distance still to be travelled.

Agenda Item 4.1



Fuel Poverty in Wales

Every person in Wales should be able to live in a warm, safe and healthy home. Yet now more than ever, this isn't the case. A toxic combination of high energy prices, low incomes, and inefficient housing deny this to hundreds of thousands of households.

This briefing has been prepared by National Energy Action (NEA): the national charity, working across Wales, England, and Northern Ireland, to end fuel poverty.

Fuel poverty: What is it and how is it defined?

A household is regarded as being in fuel poverty if they are unable to keep their home warm at a reasonable cost. This is measured as any household needing to pay more than 10% of their full household income to maintain a satisfactory heating regime. Those households needing to pay more than 20% of their full household income are regarded as being in severe fuel poverty. If a household is spending more than 8% but less than 10% of their household income, they are considered to be at risk of fuel poverty.

How many people live in fuel poverty in Wales?

Following the energy crisis, the number of households living in fuel poverty in Wales has sharply increased. In 2018, 12% of all households in Wales were estimated to be living in fuel poverty. This increased to 14% in October 2021, to up to 45% (614,000) of all households by April 2022. Of these, 8% (115,000) are living in severe fuel poverty. It is estimated that 98% (217,700) of all lower-income households live in fuel poverty, over four in 10 of whom are estimated to be in deep, severe fuel poverty¹.

These estimates remain worryingly relevant as average energy costs currently remain as high as they were in April 2022². The personal impacts of high prices on households are also exceptionally acute. With deficit budgets and nothing left to ration, the poorest households living in the least efficient homes continue to face desperate conditions. Forced to live in one room, because that is all they can try and heat. Eating cold food because they cannot afford to feed the meter. Often going without energy entirely, to the acute detriment of their health and wellbeing. Self-rationing. Self-disconnecting. Falling into overwhelming debt. The severity of the situation has prompted the energy crisis and its impacts to be one of the most prominent public policy challenges facing Wales and the UK in recent history.

Tackling Fuel Poverty Plan (2021-2035):

Welsh Government's *Tackling Fuel Poverty Plan (2021-2035)*³ was published in March 2021 to address fuel poverty in Wales and to support those "struggling to meet the cost of their domestic energy needs".

The plan includes three non-statutory targets, namely that by 2035 as far as reasonably practicable:

- no households are estimated to be living in severe or persistent fuel poverty;
- not more than 5% of households are estimated to be living in fuel poverty at any one time; *and*
- the number of all households "at risk" of falling into fuel poverty will be more than halved based on the 2018 estimate.

It contains 10 short-term, priority actions for 2021-23, which the Welsh Government is in the process of updating for 2024-26. This includes an action to continue investing and delivering home energy efficiency improvements through the Warm Homes Programme.

Warm Homes Programme:

The route to a warm and safe home in the long term is rooted in solutions that are already known. Of the three key drivers of fuel poverty, it is energy efficiency that sits most squarely within the Welsh Government's control and is a primary focus of its flagship programme to tackle fuel poverty: the Warm Homes Programme.

The demand-led scheme, Nest, offers a package of free home energy efficiency improvements to households who are in receipt of a means-tested benefit (or relative low income) and who live in a very energy inefficient home. The scheme also provides advice on saving energy, money management, fuel tariffs, benefit entitlement checks and referral to alternative schemes to all householders in Wales.

A new demand-led scheme to replace Nest is due to launch in April 2024. The Welsh Government has stated that it will continue to act as its primary mechanism to tackle fuel poverty, whilst also contributing towards a just transition to Net Zero. It intends to focus support on deeper retrofit for those least able to pay, taking a 'fabric, worst and low carbon first approach' delivering measures to improve the energy efficiency of the least thermally efficient low-income households in Wales.

What more needs to be done to tackle fuel poverty in Wales?

1. Introduction of energy-efficiency based interim targets into the *Tackling Fuel Poverty Plan (2021-2035)*

The publication of the plan and its actions were, and still are, welcomed by National Energy Action. However, as per ongoing calls from NEA and partners in the Fuel Poverty Coalition Cymru, there remains a noticeable lack of interim targets in the plan, despite the Welsh Government's statutory obligations to specify such targets. This requirement is set out in the *Warm Homes and Energy Conservation Act (WHECA) 2000*, as amended by the *Energy Act 2013*, to "specify interim objectives to be achieved and target dates for achieving them"⁴.

With eleven years left between now and the end target date of 2035, there are widespread concerns that three non-statutory targets, spanning three Senedd terms, with no interim milestones, seriously risks not driving the sustained and necessary action and investment that is required to address fuel poverty in Wales.

The introduction of meaningful energy efficiency-based interim targets would provide a clearer pathway to 2035 and vital opportunities to review progress within the Welsh Government's control. It would enable the Welsh Government to periodically review the effectiveness of its strategy and each of its shorter-term actions and allow Members of the Senedd and stakeholders to support the same.

National Energy Action's latest UK Fuel Poverty Monitor demonstrates the significant benefits of meeting energy-efficiency based fuel poverty targets, including total cumulative energy bill savings, yearly household bill savings and environmental impact⁵. In England, the UK Government has a statutory target for all fuel poor homes to meet EPC C by 2030. Modelling by Gemserv illustrates that approximately £2bn of funding would be required in Wales to ensure that all low-income households live in a property with an EPC C by 2030: £1bn of which would be required from additional government investment in Wales, alongside £1bn via private and social landlords. While this would represent a significant increase in funding, a Westminster election in 2024 comes with the possibility of new financial settlements for Wales and increases of this scale may be achievable.

2. Warm Homes Programme: scale and funding

There is an urgent need to improve the energy efficiency of fuel poor homes in Wales, to make them much warmer, greener, healthier places to live, with energy bills that are permanently low.

The tender document published by the Welsh Government as part of the procurement process for the new programme outlines that a supplier would be expected to undertake work on 11,500 properties over 7 years. This is equivalent to just over 1,600 properties a year. Based on these figures, it would take over 130 years to improve the energy efficiency of the homes of all our lower-income households currently estimated

to be in fuel poverty (i.e., up to 217,700).

If the Welsh Government is to meet its 2035 targets, dramatically reduce fuel poverty and eradicate severe fuel poverty as far as is reasonably practicable, as well as reduce carbon emissions and ensure a fair and affordable transition to net zero, it is vital the scheme receives as much funding as possible in future years.

3. Additional support from the UK Government:

With average energy prices currently sitting at £1,928 per year, standing charges in Wales at record highs, and people in deeper energy debt than ever before, there is an urgent need for additional support from the UK Government. This must be done through the following mechanisms:

1. **The introduction of a 'Help to Repay' scheme for those in debt.** NEA supports proposals to implement a debt repayment scheme⁶ to provide debt relief and repayment matching.
2. **Deeper price protection to make energy costs more affordable for vulnerable, low-income households.** This could be introduced in the form of a social energy tariff which would subsidise energy prices for fuel poor households.
3. **To reduce standing charges for prepay customers and reduce the ongoing premium Standard Credit customers still face.** Proportionately more households in Wales use prepayment meters compared to England and are significantly impacted by these charges. In addition, those who pay by standard credit are more likely to be vulnerable across several metrics yet pay more for their energy than direct debit customers.

¹ [Fuel poverty modelled estimates for Wales](#), Welsh Government, 2022.

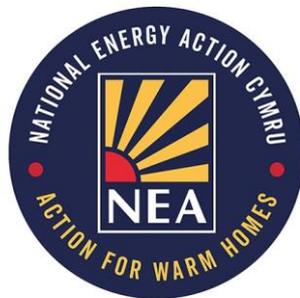
² See [Twitter thread](#) by Ben Saltmarsh, Head of Wales, National Energy Action, 2023.

³ [Tackling fuel poverty 2021 to 2035](#), Welsh Government, 2021.

⁴ [Warm Homes and Energy Conservation Act 2000](#).

⁵ Our analysis shows that if Wales had a similar target to England, then the following benefits could be accessed cumulatively up to 2030: £1.1bn in total cumulative energy bill savings for households; £0.2bn in value of increases to thermal comfort; £0.2bn in increased capital value of private rented properties; 3,000 additional full time jobs employment impact; 1.7 MtCO₂e in reduced carbon emissions; £5.5bn in improved air quality damage cost savings. See [UK Fuel Poverty Monitor 2022-23](#), National Energy Action.

⁶ [Help to Repay Scheme Proposal](#), Money Advice Trust, 2023.



Tackling Fuel Poverty Plan (2021-2035) – Interim Targets

Overview

Welsh Government's *Tackling Fuel Poverty Plan (2021-2035)*¹ was published in March 2021 to address fuel poverty in Wales and to support those “struggling to meet the cost of their domestic energy needs”.

The plan includes three non-statutory targets, namely that by 2035 as far as reasonably practicable:

- no households are estimated to be living in severe or persistent fuel poverty;
- not more than 5% of households are estimated to be living in fuel poverty at any one time; *and*
- the number of all households “at risk” of falling into fuel poverty will be more than halved based on the 2018 estimate.

The publication of the plan and its actions were, and still are, welcomed by National Energy Action. However, there remains a noticeable lack of interim targets in the plan, despite the Welsh Government's statutory obligations to specify such targets. This requirement is set out in the *Warm Homes and Energy Conservation Act (WHECA) 2000*² to “specify interim objectives to be achieved and target dates for achieving them”.

Why should interim targets be introduced?

The context around fuel poverty has changed significantly and rapidly since the original plan was first published in 2021. With fuel poverty estimates in Wales increasing from 12% of all households in Wales in 2018, to 14% in October 2021, to up to 45% (614,000) of households by April 2022, the strategy has been overwhelmed by the scale of the energy crisis.

With eleven years left between now and the end target date of 2035, there are widespread concerns that three non-statutory targets, spanning three Senedd terms, with no interim milestones, seriously risks not driving the sustained and necessary action and investment that is required to address fuel poverty in Wales. In National Energy Action's latest UK Fuel Poverty Monitor (UKFPM)³, 1 in 2 stakeholders who responded to our Call for Evidence told us that at least one of the three targets for Wales is unlikely to be met.

The introduction of meaningful interim targets would provide a clearer pathway to 2035 and vital opportunities to review progress. It would enable the Welsh Government to periodically review the effectiveness of its strategy and each of its shorter-term actions and allow Members of the Senedd and stakeholders to support the same.

It is understood that the Welsh Government is facing its toughest budgetary situation since devolution and that resources are limited as a result. The introduction of interim targets would help maximise the effective use of funds through prioritisation to key areas.

Energy efficiency-based targets

The route to a warm and safe home in the long term is rooted in solutions that are already known. Of the three key drivers of fuel poverty, it is energy efficiency that sits most squarely within the Welsh Government's control and is a primary focus of its flagship programme to tackle fuel poverty: the Warm Homes Programme. As such, it is advised that the Welsh Government should introduce energy efficiency-based targets as interim targets in the *Tackling Fuel Poverty Plan*

Introducing such interim targets and committing to them as a core element of wider fuel poverty goals, would not only support the Welsh Government to meet statutory requirements, but help to realise these benefits in Wales. It would also embed welcome Worst First and Fabric First overarching principles of the Welsh Government's *Tackling Fuel Poverty Plan* into its targets and actions.

In England, the UK Government has a statutory target for all fuel poor homes to meet EPC C by 2030. As part of the UKFPM, modelling by Gemserv illustrates that **approximately £2bn of funding** would be required in Wales to ensure that all low-income households live in a property with an EPC C by 2030: **£1bn of which would be required from additional government investment in Wales, alongside £1bn via private and social landlords**. This is an example of an interim target that could be introduced and funded as described.

Benefits and opportunities

There are several benefits associated with the introduction of energy efficiency-based interim targets:

1. Our latest UK Fuel Poverty Monitor has demonstrated the significant benefits of meeting energy efficiency-based fuel poverty targets. It shows that if Wales had a similar target to England, then the following benefits could be accessed cumulatively up to 2030:
 - a. £1.1bn in total cumulative energy bill savings for households
 - b. £0.2bn in value of increases to thermal comfort
 - c. £0.2bn in increased capital value of private rented properties
 - d. 3,000 additional full time jobs Employment impact
 - e. 1.7 MtCO₂e in reduced carbon emissions
 - f. £5.5bn in improved air quality damage cost savings
2. Improving the energy efficiency of inefficient, fuel poor homes in Wales is inescapable and must be done in order to meet fuel poverty and climate change targets and become the "low carbon society" envisioned in the *Well-being of Future Generations Act*.
3. The longer energy-inefficient homes are left untreated, the more costly the work becomes to both the Welsh Government and the householders who are suffering in the meantime. As such, there is an urgent need to improve the energy efficiency of fuel poor homes.
4. Poor quality housing has wider, detrimental impacts on health and wellbeing. It is estimated to cost the NHS in Wales £95m every year⁴ and, at its worst, leads to premature deaths. Spending on energy efficiency will ultimately result in savings in the longer term⁵.

There are also several opportunities available to support this:

- There are opportunities to maximise external resources and funding, such as through the private rented sector, social landlords, and UK Government schemes (including ECO).
- An upcoming Westminster election in 2024 comes with the possibility of new financial settlements for Wales.

¹ [Tackling fuel poverty 2021 to 2035](#), Welsh Government.

² [Warm Homes and Energy Conservation Act 2000](#).

³ [UK Fuel Poverty Monitor 2022-23](#), National Energy Action.

⁴ [The full cost of poor housing in Wales](#), Public Health Wales.

⁵ Public Health Wales estimate that for every £1 spent on improving warmth in vulnerable households, this results in £4 of health benefits, and there could be close to 40% fewer hospital admissions for some cold-related illnesses in those with upgraded homes." [See Making a Difference Housing and Health: A Case for Investment](#), Public Health Wales.



Agenda Item 6
Fire Officers' Association
London Road
Moreton-in-Marsh
Gloucestershire
GL56 0RH

Jenny Rathbone MS

by Email

29th February 2024

Dear Ms Rathbone

Equality and Social Justice Committee Inquiry

Thank you for your letter dated 13th February regarding governance arrangements for South Wales Fire and Rescue Service. The Fire Officers Association does not have a branch representative in South Wales Fire and Rescue Service therefore we do not have intimate knowledge of the service or its fire and rescue authority. There are no tools available such as His Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) to use to gain an insight into the service.

That said I have read the South Wales culture review report and conducted my own limited research into the South Wales Fire Authority using what is available. I also have approaching 40-years' experience of the fire and rescue service as an employee as well as many years representing the Fire Officer's Association and its members.

I therefore offer the following comment;

Having viewed a number of South Wales Fire and Rescue Authority meetings it is clear to me that many of the local Councillors do not possess the requisite skills to provide the level of oversight, scrutiny and challenge required when providing governance for a large (in fire and rescue service terms) public sector organisation. Many of the fire authority members make little or no contribution during the meetings and some fire authority members become confused with regard to the content of some of the papers. However well meaning, the current Fire and Rescue Authority members are not and are unlikely to be in a position to provide the level of effective strategic oversight needed to assist the organisation in achieving the cultural change required.

The Welsh Government's 2018 consultation on reform of fire and rescue services appears not to have delivered the outcomes intended by the Welsh Government. With regard to the number and quality of fire authority members (in SWFRS) there appears to have been no change whatsoever. Governance has not been strengthened therefore I can only conclude that the lack of effective strategic oversight has contributed to the current situation in South Wales. Unfortunately, this is not unique to South Wales as, all too often, we have encountered fire and rescue authorities around the United Kingdom that are unable to provide the level of strategic

direction and oversight required to avoid decisions being made that are not in the best interests of the service and the public.

You will be aware that in England in 2017 HMICFRS assumed the role of inspection of fire and rescue services. Before 2017 it was very difficult if not impossible to gauge the performance of fire and rescue services. A system of "Peer Review" was in place but this system of inspection had many flaws. HMICFRS with its long tradition of inspection of police forces brought a level of inspection never seen before in English fire and rescue services. The inspection regime provides the evidential rigour required for a modern fire and rescue service. It is also easy to monitor the relative performance of all English fire and rescue services unfortunately the same cannot be said for fire and rescue services in Wales. The HMICFRS system is not perfect but it is evolving after each round of inspections.

There is a need to strengthen the inspection regime in Wales and improvements will only materialise if the Welsh Government is able to invest in a HMICFRS type system of inspection which includes publishing the results.

In conclusion the Fire Officers Association is an independent fire and rescue service trade union with no political affiliation. Our role is to assist our members where necessary. Having worked in a fire and rescue service that at times had what can only be described as a "toxic" culture I think it is of paramount importance that we do what we can to assist the process that provides a more pleasant working environment that will add value to the organisation which can only benefit the service and the public they serve.

Yours sincerely



Ade Robinson
Chief Executive Officer
Fire Officers Association

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

- 1.1 While Mid & West Wales Fire & Rescue Authority (MAWWFRA) is familiar with the general findings relating to Fire Authority Governance from within the South Wales Fire & Rescue Service (SWFRS) report, it is not familiar with the same level detail for which South Wales Fire & Rescue Authority (SWFRA) would have been aware of from its Officers. However, on a point of effective Fire Authority governance within a Welsh Fire & Rescue Service, I am encouraged by the views captured by Fennella Morris KC which indicated that SWFRA does have sufficient legal structures in place for effective governance of the Service in relation to issues of culture (Page 111) with evidence arising from recent decisions made by that Authority towards recommendations by the then present Chief Fire Officer (CFO).
- 1.2 In view of the limited level of detail available to MAWWFRA to provide a definitive perspective on this first question, it would be remiss of MAWWFRA not to set out some key factors relating to the effective governance arrangements for its own Fire & Rescue Authority (FRA). As captured within the Fire & Rescue National Framework for Wales 2016, Section 21(c) of the Act states that Fire and Rescue Authorities must have regard to the National Framework in carrying out their functions. I can confirm that MAWWFRA has and continues to deliver upon the Framework's aim which is *"to keep people, communities, businesses and the environment in Wales safe from fires and other hazards as effectively and efficiently as possible"*.
- 1.3 MAWWFRA effective governance arrangements can be evidenced from established adherence to the MAWWFRA Constitution made through its formal reporting and scrutiny structure comprising of the main Fire Authority meeting and its supporting Committees to include Resources Management Committee (RMC), Performance, Audit & Scrutiny Committee (PASC), Fire Authority Standards Committee as key examples. MAWWFRA reports contained therein are consistently comprehensive, providing MAWWFRA Members with the full understanding of the matter in hand enabling Members to scrutinise any matters with Officers accordingly. Such reports are complimented by reports received from both Internal and External auditors on a range of themes and these serve to provide Members with additional perspectives of the management arrangements and performance in place by the MAWWFRS.
- 1.4 As defined under Article 5 of the MAWWFRA Constitution, the MAWWFRA Chair and Deputy Chair are elected by MAWWFRA Members at the Annual General Meeting who then hold office for a period of two years, with the Deputy Chair following the Chair into Office. MAWWFRA have consistently rotated their Committee Chairs and Deputy Chairs as MAWWFRA meeting records will attest.
- 1.5 On matters of culture and inclusion, MAWWFRA has been kept informed of the publication of His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) Spotlight report titled 'Values and culture in fire and rescue services' and MAWWFRS response which has been closely followed with MAWWFRS own independent Staff Culture Survey, commissioned in 2022 and

reported in 2023, the results of which were presented to all staff, to MAWWFRA Members, Chief Fire & Rescue Adviser and Inspector for Wales (CFRAIW), Welsh Government (WG) and the Welsh Local Government Association (WLGA). In addition to the established Committees as defined by the MAWWFRA Constitution, the MAWWFRA is subject to a number of additional Corporate Planning (MAWWFRA Member and Officer) events led by the Chief Fire Officer and his Executive Leadership Team and these events are used to further inform MAWWFRA Members of important matters relating to the Service's local performance as well as wider sector specific issues such as the emergence of the culture and inclusion focus. The combination of the structured MAWWFRA meetings and the additional Corporate Planning events ensure that MAWWFRA Members are kept informed in the fullest of matters pertaining to the Service's delivery of service and providing additional opportunities for MAWWFRA Member scrutiny.

- 1.6 The Service actively encourages MAWWFRA member representation on a number of its groups and these include an Equality, Diversity & Inclusion Champion and a Health, Safety & Wellbeing Champion as examples, and these representatives allow for both an independent and MAWWFRA Member perspective to be obtained from their attendance.
 - 1.7 The role and function of the Fire Authority Standards Committee includes overseeing the Authority's 'whistle-blowing' procedure as well as to receive an annual report on the Authority's Compliments, Complaints and Comments procedure. Currently, a proposal is being made to the MAWWFRA Democratic Services Forum to include reports on historic misconduct cases to be presented and scrutinised by the MAWWFRA Scrutiny Panel.
 - 1.8 In accordance with the Fire Authority Constitution, all MAWWFRA Members are authorised to visit any service premises and a number of Members visit Fire Stations within their constituency and actively engage with Service staff present at such locations. These are also additional opportunities for Members to qualify matters reported formally into the Fire Authority and its Committees with front line staff.
- 2. 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.**
- 2.1 The Mid and West Wales Fire Services (Combination Scheme) Order 1995 established the Mid and West Wales Fire Authority. Part 2, Section 5 (Fire Brigade for combined area) Section 9 (Officers and Employees) sets out both the requirement and duty for the Authority to set out an establishment scheme and the appointment of Officers and Employees as they think necessary for the efficient discharge of their functions.
 - 2.2 Article 33 of the MAWWFRA Constitution relates to the Authority's Code of Corporate Governance and this sets out unequivocally the responsibility recognised by the Authority in leading by example in its decision making and other processes and actions, with Members and Officers acting in accordance with high standards of

conduct. This Article reflects the guidelines published by the Chartered Institute of Public Finance and Accountancy / Society of Local Authority Chief Executives which are Openness and Inclusivity, Integrity and Accountability. The Authority's Code of Corporate Governance is a public statement of the commitment to these principles and sets out clearly the way in which this commitment is being, or will be, met.

- 2.3 Article 34 of the MAWWFRA Constitution relates to the Code of Conduct for Officers which sets out the expectation that the public is entitled to expect the highest standards of conduct from all employees who work for the Authority. This continues by citing that employees must act with integrity, respect, honesty, impartiality and objectivity, and that employees will be expected through agreed procedures and without fear of recrimination, to bring to the attention and appropriate level of management, any deficiency in the provision of the service.
- 2.4 MAWWFRA have been briefed on these specific matters in relation to their context for MAWWFRS. The potential areas of concern identified within the SWFRS Report which relate to existing management structures and practices, values and standards, leadership to include a performance review of the Executive Leadership Team (ELT) and Restructure Corporate departments as examples, are not areas of change that are observed to be required from within MAWWFRS based upon the performance and conduct reported into MAWWFRA to date.
- 2.5 Indeed, the professional engagement coupled with the high degree of openness, transparency and effectiveness between MAWWFRA and the Chief Fire Officer and his Executive Leadership Team is commendable. It would be remiss of this response not to reflect that there will always be aspects of negativity present in every organisational employment area, however, from the evidence that has been presented to the MAWWFRA through its structured meetings and the ensuing scrutiny which has been applied, I am of the opinion that there are strong and effective management arrangements within MAWWFRS which sets it apart from the other two Welsh Fire & Rescue Services and specifically in regard to what has been highlighted within the SWFRS report.
- 2.6 In the event that MAWWFRA is required to invoke changes to the existing management structures and practices as a result of potential areas of concern, as Chair of MAWWFRA under Article 5 of the MAWWFRA Constitution my role is to hold Officers to account by means of the decision making and scrutiny structures of the Authority when appropriate.
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 FRAs?**
 - 3.1 MAWWFRA recognises that a number of the recommendations identified in the 2014 Commission of Public Service Governance and Delivery were captured in the 2016

Fire & Rescue National Framework (Wales), setting out the Welsh Government's vision and priorities for FRAs in Wales. It describes what the Welsh Government expects of the FRAs and creates the foundation on which to build and promote improvement, efficiency and innovation.

- 3.2 MAWWFRA has always been and continues to support the need for reform where it enhances the provision of service to the communities and citizens in which it serves.
- 3.3 MAWWFRS sets out high standards in the delivery of its services and has been at the forefront of broader collaborative work with the two other Fire and Rescues Services in Wales as well as with the wider blue light and public sectors within Wales.
- 3.4 MAWWFRA has continually engaged with Welsh Government (Fire Branch) on areas of continuous improvement, these range from reducing incidents of fire, responding to emergencies, firefighter safety, preventative work within the community and supporting Welsh Ambulance Service NHS Trust on Medical response. These areas of reform are a mixture of statutory and non-statutory functions for which MAWWFRS has been actively engaged with WG throughout.
- 3.5 MAWWFRA have continually requested a position update from WG upon their proposal to publish a revised Fire & Rescue Services Framework for Wales and to date, the revised Framework remains unpublished. As a result, MAWWFRA has continued to operate within the current statutory framework until such time a new framework is published.
- 3.6 MAWWFRA has fully engaged with the CFRAIW at every opportunity and contributed to the Thematic Reviews (TR) which have arisen as a result.
- 3.7 In relation to matters pertaining to broadening the firefighter role, progress on this on the whole has not progressed at either a regional or national government level. MAWWFRA continues to show a proactive approach through its undertaking of Fire Medical Response at a local level; the only Fire and Rescue Authority (FRA) in Wales to do so.

4. 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.

- 4.1 MAWWFRA provided a comprehensive response to the 2018 consultation however it has not seen clear evidence of how the responses have shaped current governance arrangements relating to the FRA.
- 4.2 As already mentioned, MAWWFRA has fully engaged on 'Thematic Reviews' led by the CFRAIW although these have focussed on operational managerial arrangements as opposed to a focus on fire authority governance reform.

- 4.3 MAWWFRA has fully engaged with Audit Wales on its current project titled 'Governance in Fire and Rescue Authorities'. This participation has been at both a Fire Authority Member and Officer level through a series of interviews and MAWWFRA awaits the findings due to be published in 2024.
- 4.4 MAWWFRS have recently reviewed its response to non-domestic property fire alarms in line with the findings arising from the June 2023 Audit Wales review into 'False Fire Alarm Reduction - Mid and West Wales Fire and Rescue Authority'. These findings have resulted in a revised response to fire alarms procedure for non-domestic premises within MAWWFRA which will take effect from May 2024. MAWWFRA have been fully informed of this procedural change by MAWWFRS Officers.
- 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 MAWWFRA are unclear on what mandate this proposal is being made upon. Existing arrangements of inspection through the CFRAIW while not the same model as in English FRS remains an opportunity for further enhancement as defined in the CFRAIW terms of reference.
- 5.2 MAWWFRA are familiar with the role of the Auditor General for Wales as evidenced in this submission and will continue to support their work where it relates to MAWWFRA and the ongoing improvement of enhancing services for its communities and citizens.
- 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 from inspections of FRSs undertaken in other UK nations, specifically in England, to inform policy.**
- 6.1 MAWWFRA is updated through its established committees on matters pertaining to existing performance and continuous improvement. An example of this is the current training and development review which has been commissioned as a MAWWFRS corporate project and aims to conduct a root and branch review of the existing practices around the training and development of risk critical, leadership and management skills. It pays cognisance to the work of the CFRAIW and has incorporated the outcomes of those thematic review outcomes into its base terms of reference.
- 6.2 MAWWFRS has a clear mandate to benchmark and align its current operating arrangements with new and emerging National Operational Guidance (NOG) and the ensuing National Operation Learning (NOL) that arises as a result. All of which strives MAWWFRS to achieve and maintain the highest level of operational safety and performance in its delivery of service.

28/02/2024

Fire Standard Board: Written Submission to the Senedd's Equality and Social Justice Committee Inquiry into Fire and Rescue Services in Wales

1. The Fire Standards Board is honoured to have been asked to provide evidence to the Senedd's Equality and Social Justice Committee. We hope that the Committee finds the contents of this written submission helpful. It is intended to form the backdrop to the oral evidence that the Fire Standards Board (the Board) Vice Chair, Alison Sansome, will give to the Committee.
2. While the Fire Standards Board's terms of reference are limited to England, and the Fire Standards are directly addressed to the 44 Fire and Rescue Services in that country, we have had contact both with the Welsh Fire and Rescue Services and Services operating in the other devolved nations. Recognising the collaboration that exists across borders, we have encouraged those services to engage with the Standards.
3. We believe the Standards demonstrate the professional considerations any Fire and Rescue Service in any part of the UK although the Fire Standards are based on English legislation. It is important to understand that Standards cannot be altered to reflect national considerations, but must remain intact as published.

The Fire Standards Board

4. In May 2016 the then Home Secretary, Theresa May, announced an ambitious fire reform programme aimed at making England's fire and rescue services more effective, professional, and accountable. The Government felt that the agenda needed to be owned by the sector empowering it to shape and deliver reforms and become self-transforming.
5. Included in this agenda together with the establishment of an inspection regime led by Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) was the creation of the Fire Standards Board. This body was tasked with developing a coherent and comprehensive set of professional standards for the Service. It was given the role to oversee the identification, development, and maintenance of professional standards for the benefit of the profession, the services and the public served by them. It began operating in 2019, and, following the work necessary to identify what areas of service activity required standards and the process for producing them, the first Standards were published in February 2021.
6. The Board's composition reflects its major stakeholders. In addition to the independent Chair and Vice-Chair, the Board includes the Chair of the National Fire Chiefs Council (NFCC); a representative each from the Local Government Association (LGA); the Police, Fire and Crime Commissioners Association (APCC); and the Home Office. All who attend do so as representatives not delegates. The list of 2023/24 Board members is at [Annex A](#).
7. The NFCC, which is itself a UK-wide organisation, provides both the Board's executive support, led by the Fire Standards Team, and access to subject matter experts who lead on developing the different standards. As neither the Board nor the Inspectorate are regulators, the responsibility for ensuring that Standards are implemented and their benefits achieved falls to the services themselves and their employers, who are represented on the Board by the LGA and the APCC.

8. The Fire Standards Board strongly believes that services should consider their improvement action plans holistically as it is likely the improvements required to achieve the outcomes of a Fire Standard may well correlate to areas for improvement identified through governance and audit.

The Suite of Fire Standards

9. The development of a Standard is thorough and consultative. Starting with a scoping and planning stage, there then follows development work including peer review leading to the Board agreeing to a public consultation on the draft Standard. Consultation responses received are analysed, with the Fire Standard Team producing a full report for consideration by the Board which explains why proposed changes to the draft have been accepted or rejected. The Board will consider signing off the Standard for publication once it has reviewed and is satisfied both with the final draft Standard and the conclusions of the Quality Assurance Report which is focused on commenting on the Standard's production process, noting any recommendations for possible improvements. Once approved, the Standard is launched with suitable communications together with an accompanying implementation tool. Thereafter information is continually gathered on the Standard's impact. The process from start to finish takes on average approximately six months to a year.
10. We appreciate the engagement of colleagues from Welsh Services who have contributed to both the development of Standards and responded to consultations. Their contributions have been beneficial. In addition, Welsh Fire and Rescue Service colleagues have attended workshops designed to help Services successfully embed the Standards.
11. The Board has recognised that it was important to publish a statement on its website outlining the Board's position with regards to the level of equality impact assessment undertaken when producing Fire Standards. The statement reads as follows:

"The Fire Standards are designed to be applicable to all fire and rescue services in England and for the wider benefit of local communities. Fire Standards are produced by the services for the services.

The Fire Standards Board is committed to listening and responding to a diversity of voices. Through its open consultation process, it welcomes views and feedback from those with differing backgrounds and experiences about its Fire Standards. With best endeavours, it considers all feedback as part of its development and approval process to ensure the standards will not directly or indirectly discriminate against a person or persons or negatively affect them.

Achieving the Fire Standards will support fire and rescue services in complying with their public sector equality duty under the Equality Act 2010, in particular that means their responsibility to; eliminate discrimination, harassment and victimisation, advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it, and to foster good relations between persons who share a relevant protected characteristic and persons who do not share it. The impact of this will benefit the fire sector and the wider community."

12. At the time of this review, 16 Fire Standards have been published, which can be found on the Fire Standards Board website by following this link: <https://www.firestandards.org/>. The expectation is that the initial suite will consist of around 20 Standards. The Board decided that four areas were better expressed not as separate Standards, but as cross-cutting themes reflected in several Standards, as appropriate. These cross-cutting themes are identified as: environment and sustainability; equality, diversity, and inclusion; health and wellbeing; and organisational learning.

13. Standards should not be seen as silo documents as their relationships produce positive synergies needed to achieve improvements. Separately and together, they help drive improved quality of service to support the safety, health, and wellbeing of communities. They act to enhance professionalism through consistent application, improved competence and diminishment in organisational risk. They enable services to collaborate effectively with other services across borders or nationally. They ensure better and greater accountability assisting governing bodies and operational leaders in assessing local performance. The outcome of achieving the Standards is a more positive Service culture and working environment leading to increased public confidence which can only add to maintaining trust in and the upholding of the Service's reputation.
14. Recognising that services can have very different demographics, geographies and challenges, the Standards are deliberately written to be principles based. Each begins with an outcome statement which states what good looks like. This is followed by what is required to achieve that outcome, the "how to" section. This directs services to the tasks they must, should, or may take to achieve the outcome. The Standard's remaining sections are: expected benefits of achieving the Standard; legal requirements or mandatory duties; linked qualifications, accreditations or Fire Standards; and guidance and supporting information. This material is published separately by NFCC and contains any necessary further details.
15. Services are encouraged and expected to work towards achieving the Standard's stated outcome through reflection and self-assessment and by avoiding simply treating Standards as a tick box compliance exercise. The Fire Standards Board anticipates that in many cases services may already be achieving much of what each Standard's outcome requires understanding that different services will have specific strengths and weaknesses. Every Fire Standard has a corresponding Gap Analysis Tool to support services with implementation. These help services assess how well they currently meet the outcome statement and to identify any additional actions required.
16. Whilst it is not mandatory for English Services to comply with the Fire Standards, England's National Fire Framework makes clear that Services are expected to pay due regard to them.
17. [Annex B](#) is a table which lists Standards which are especially directed in supporting a service's effectiveness, efficiency and care of its people.

Leading the Service, Leading and Developing People, Communications and Engagement, Code of Ethics Standard and Safeguarding

18. For the purposes of this inquiry, these five Standards merit particular attention. Considering the need to improve values and culture in the sector, the Fire Standards Board and the NFCC's Implementation Team have worked to focus Services on delivery of these Standards.
19. The two Leadership Standards were benchmarked against recognised leadership Standards, but, as with all Fire Standards, were put into a context suitable for fire and rescue services. The Leading the Service Fire Standard was developed to help leaders to self-reflect, lead by example and clearly articulate the expectations of those who lead within services, particularly their behaviours, ethics and the activities required in an ever changing world. It expects senior service leaders to set a compelling vision for their service and translate that into a comprehensive delivery plan. The Leading and Developing People Fire Standard concentrates on how services should attract and retain a competent workforce that is diverse, motivated, and engaged. That Standard also puts an emphasis on workforce development, health, and wellbeing. The NFCC Implementation Team has provided significant support in embedding these two standards within services.
20. The Code of Ethics Standard is coupled with the Core Code of Ethics for Fire and Rescue Services and seeks to ensure that Services embed and are committed to the ethical principles and professional behaviours contained in that document as evidenced by the attitudes and conduct of those who lead and who work for or on behalf of the service, with the service operating according to corporate ethical business practices.

21. Recognising that accessible, and inclusive communication and engagement are fundamental in building a positive working environment and culture and key in keeping communities safe, the Communication and Engagement Fire Standard clarifies the importance of these areas in all aspects of a fire and rescue service. It aims to ensure Fire and Rescue Services have defined approaches on how to strategically communicate to all stakeholders, both internally and externally. FirePRO, the membership body for communications professionals working in fire and rescue, developed the Standard, on behalf of the FSB, engaging with industry leaders both from the Chartered Institute for Public Relations and the Local Government Association
22. The Safeguarding Standard promotes the safeguarding of those in the community, employees, and volunteers. It seeks to encourage services to work proactively to reduce the risk of abuse, harm, and neglect. It is expected that services will be compliant with safeguarding legislation and fulfil their safeguarding obligations and responsibilities. It puts emphasis on staff being suitably trained, supported, and empowered to be able to respond adequately to safeguarding incidents as appropriate to their roles and responsibilities.
23. The Communication and Engagement Fire Standard (discussed above) and the Fire Control Fire Standard were both launched in April 2023. The development of the Fire Control Standard was influenced by major incident incidents such as Grenfell and the Manchester Arena bombing. It addresses the fundamental and strategic role that Fire Control plays from initially receiving the first contact through to the very close of an incident. This Standard's development drew on the expertise and wide knowledge of Fire Control in all operational service activity including the NFCC Fire Control Team, the NFCC Lead for Fire Control, the Mobilising Officers Group and control specialists from a wide range of Fire and Rescue services. The intention is for this Standard to assist in creating better resilience, greater strategic awareness and interest in Fire Control, improved levels of recruitment and retention and professional development opportunities.

Ongoing Work

24. During the year progress was also made on the production of several other Standards as described below.
25. Currently an Internal Governance and Assurance Fire Standard is in development and is expected to be published at the beginning of 2024/25. Another Standard in production is the Procurement and Commercial Standard, which we hope will be ready for publication by early Summer 2024.
26. Work on the provisionally titled Digital and Information Technology Fire Standard was initiated with a working group session to confirm the Standard's scope and to gather any related information to support early drafting work. Again, the Board is expecting to consider approval of this Standard in summer 2024.

Responding to HMICFS' Spotlight Report on Culture and Values' Recommendations

27. In March 2023, HMICFRS published its Spotlight Report on Culture and Values. This contained three recommendations directed to the Fire Standards Board which referred to safeguarding measures, staff disclosures, complaints and grievances and misconduct. This led to the Board determining that to meet these recommendations moderate changes were needed to three Standards - Leading the Service, Leading and Developing People, and Safeguarding. The necessary changes were made by including additional guidance and supporting information, linked qualifications, and, in the case of the Safeguarding Fire Standard, additional material to reflect changes in primary legislation. The revised Standards were republished on the Fire Standards Board website.

Future Plans

28. If the production of Standards mentioned above proceeds as expected, it is anticipated that the initial suite of Standards will be completed during 2024/25. In addition, the Fire Standards Board has three priorities for the coming year. First, to begin its scheduled review of published standards to ensure they remain relevant and current. Second, to concentrate through enhanced communications and engagement the successful incorporation of the Standards and gain insight into the benefits for services by their implementation. It is apparent from feedback that whilst some services are making excellent progress towards achieving the Fire Standards, there is more to do in supporting services in achieving this. Third, to be sensitive to the possibility that there may be other areas where Standards might be beneficial.

How to find out more

29. The Fire Standards Board publishes information about its activities on the following channels – website (www.firestandards.org), twitter and linkedin. The website contains a number of short videos featuring Fire Standard Board members explaining how the bodies they represent on the Board contribute to developing and delivering the Standards.

Suzanne McCarthy

Alison Sansome

Independent Chair and Vice Chair, Fire Standards Board

28 February 2024

Annex A: Fire Standards Board Membership

The Board has a Chair and Vice Chair, both independent from Government and the fire and rescue

The membership of the Fire Standards Board is as follows:

- Suzanne McCarthy, Independent Chair
- Alison Sansome, Independent Vice-Chair
- Ben Adams, Police, Fire and Crime Commissioner for Staffordshire, representing Association of Police and Crime Commissioners
- Yvette Bosworth and Suzie Daykin Home Office
- Greg Brackenridge, Local Government Association
- Mark Hardingham, Chair National Fire Chief's Council

Annex B: Efficiency, Effectiveness and People Standards

Questions v approved and proposed Fire Standards



<p style="text-align: center; background-color: #e00000; color: white; padding: 5px;">How effective is the FRS at keeping people safe and secure from fire and other risks?</p> <ul style="list-style-type: none">• Community Risk Management Planning• Emergency Response Driving• Fire Control• Prevention• Protection• Operational Response x 3• Emergency Preparedness and Resilience (local, regional national)• Code of Ethics• Communication and Engagement• Safeguarding	<p style="text-align: center; background-color: #808080; color: white; padding: 5px;">How efficient is the FRS at keeping people safe and secure from fire and other risks?</p> <ul style="list-style-type: none">• Community Risk Management Planning• Data Management• Fire Investigation• Safeguarding• <i>Procurement and Commercial</i>• <i>Internal Governance and Assurance</i>• <i>Digital and IT</i>	<p style="text-align: center; background-color: #e00000; color: white; padding: 5px;">How well does the FRS look after its people?</p> <ul style="list-style-type: none">• Leading the Service• Leading and Developing People• Code of Ethics• Safeguarding• Communication and Engagement
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* Standards in italics are still in development.

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.

Reference: 4085A2024

Date issued: 7 March 2024

Equality and Social Justice Committee Inquiry into fire and rescue authorities

- 1 The Auditor General for Wales welcomes the opportunity to respond to the Senedd Equality and Social Justice Committee's Inquiry into fire and rescue authorities. The evidence below summarises the duties of the Auditor General in relation to fire and rescue authorities. It also summarises the work I have undertaken in recent years under these powers and duties, together with some findings from this work that I believe may be relevant to the Committee's Inquiry.
- 2 I note that part of the Inquiry's Terms of Reference relates to "The changes needed to strengthen current arrangements for inspection and audit, including the role of external bodies including the Auditor General for Wales." Given my role, much of my evidence focuses on this aspect of the Committee's Terms of Reference.

The duties of the Auditor General in relation to fire and rescue authorities

- 3 The sections below summarise the main duties of the Auditor General in relation to fire and rescue authorities in Wales. These duties provide a relatively comprehensive if rather complex set of duties covering the audit of accounts, arrangements to secure value for money and continuous improvement, application of the sustainable development principle and studies designed to make recommendations to improve value for money in the discharge of functions and to improve financial or other management. (The Auditor General also has a power to undertake other studies of services.)
- 4 I am aware that the Welsh Government plans to replace the improvement regime set out in the Local Government (Wales) Measure 2009 for fire and rescue authorities. Although as far as I am aware the details of the replacement regime have not yet been finalised.

Audit of Accounts

- 5 Fire and rescue authorities, as local government bodies, fall under the requirements of the Public Audit (Wales) Act 2004 in relation to the audit of accounts. Under this Act the Auditor General is required to audit the accounts of fire and rescue authorities annually. Section 17 of the 2004 Act requires that in doing so he must satisfy himself:
- that the accounts are prepared in accordance with the Accounts & Audit (Wales) Regulations (made under section 39);
 - that they comply with the requirements of all other statutory provisions applicable to the accounts;
 - that proper practices have been observed in the compilation of the accounts;
 - that the body has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources; (see further details on this below under the section 'performance audit').

Performance Audit

- 6 Performance audit work at fire and rescue authorities is undertaken under a range of provisions of legislation. The Local Government (Wales) Measure 2009 still applies to fire and rescue authorities, whilst it no longer applies to principal councils or national parks. Under the Measure, fire and rescue authorities are required to put in place arrangements to make continuous improvements, including related plans and reports, and the Auditor General has to assess whether each authority has met these requirements.
- 7 This includes an audit of each fire and rescue authority's annual improvement plan, and an audit of each fire and rescue authority's annual performance report. Following these audits the Auditor General issues a certificate including his opinion as to whether or not each fire and rescue authority has complied with the requirements of the Measure in respect of each document. Under the Measure, the Auditor General is also required to undertake an assessment and state whether on the basis of that assessment he believes that each fire and rescue authority is likely to meet the requirements of Part 1 of the Measure, which chiefly concern putting in place arrangements to secure continuous improvement.
- 8 Under the Well-being of Future Generations (Wales) Act 2015, the Auditor General is required to assess the extent to which fire and rescue authorities are acting in accordance with the sustainable

development principal in setting their well-being objectives and taking steps to meet them.

- 9 As noted above, under the Public Audit (Wales) Act 2004, the Auditor General is also required to be satisfied annually that each fire and rescue authority has put in place proper arrangements to secure value for money in the use of its resources.
- 10 As an indication of the scope of performance audit work undertaken each year to meet the audit requirements of the Measure, the 'proper arrangements' element of the Public Audit (Wales) Act 2004 and the Well-being of Future Generations (Wales) Act 2015, the indicative audit fee for 2023-24 for this element of my audit work at each fire and rescue authority was £16,380. Depending on the grade mix of staff involved, this translates into approximately 20-25 days of staff time to deliver duties under three distinct pieces of legislation. I can increase the fees charged to an individual body where additional complexity or audit risks are identified, but I may not charge more than the full cost of undertaking these functions. However, in view of the relative scale of fire and rescue authority budgets and the need to be proportionate, the amount of fee charged, and level of audit work I undertake is significantly less than for example at unitary authorities.
- 11 The Auditor General is also required to undertake certain Local Government Studies under the Public Audit (Wales) Act 2004. These studies typically concern the discharge of functions of principal councils, however the duties under this legislation also cover fire and rescue authorities and national park authorities.

Key findings from recent audit work

- 12 I have consistently concluded that fire and rescue authorities have prepared financial statements that are 'true and fair' with no significant findings or recommendations specific to the financial statements or key financial processes.
- 13 I have also consistently concluded that fire and rescue authorities have complied with the requirements of the Local Government (Wales) Measure 2009.
- 14 Through my recent annual performance audit programmes I have commented on governance issues in fire and rescue authorities. Where relevant I have summarised these references in relation to South Wales Fire and Rescue Authority below.
- 15 In 2023 I reported on 'Fire False Alarm Reduction' at each fire and rescue authority. I published the report of my findings relating to

South Wales Fire and Rescue Authority in July 2023.¹ I concluded that the Authority has made progress in its approach to managing fire false alarms. Making better use of data and learning from elsewhere will identify opportunities to better manage performance and risks.

- 16 In 2022 I reported on Carbon Emissions Reduction at each fire and rescue authority. I published the report of my findings relating to South Wales Fire and Rescue Authority in April 2022². Overall, I reported that the Authority is creating the right infrastructure to become carbon neutral by 2030 but needs to deliver its ambitious targets and address some big risks.
- 17 In 2021 I reported on ‘Corporate Resilience’ at each fire and rescue authority. I published the report of my findings relating to South Wales Fire and Rescue Authority in November 2021³. In the report I concluded in relation to governance that the Authority has appropriate governance systems but scrutiny of decisions and holding officers to account does not always give sufficient assurance that all big corporate risks are being addressed.
- 18 In January 2022 I reported on my study of Joint Working Between Emergency Services⁴. My overall conclusion was that blue light emergency service collaboration is slowly growing but requires a step change in activity to maximise impact and make best use of resources.
- 19 Whilst not specific audit work, it is relevant to note that I have not received any whistleblowing reports or correspondence in relation to the culture of South Wales Fire and Rescue Authority.
- 20 Although not audit findings, in my response⁵ to the Welsh Government’s consultation on its 2019 White Paper on the ‘Reform of the Fire and Rescue Authorities in Wales’, I also commented on several themes that the Committee may consider relevant to its Inquiry. These included that the White Paper did not provide sufficient consideration of equality and diversity in relation to those who manage and scrutinise services.
- 21 In my response I also recognised the merit in local authorities continuing to nominate fire and rescue authority members. I

¹ [South Wales Fire and Rescue Authority – Fire False Alarm Reduction | Audit Wales](#)

² [South Wales Fire and Rescue Authority – Carbon Emissions Reduction | Audit Wales](#)

³ [South Wales Fire and Rescue Authority – Corporate Resilience Report | Audit Wales](#)

⁴ [Joint Working Between Emergency Services | Audit Wales](#)

⁵ [Consultation on the Reform of the Fire and Rescue Authorities in Wales - Consultation Responses 31 to 60](#)

suggested there was a need for the Welsh Government to ensure that the nomination process is both fair and transparent to secure representatives with sufficient seniority, skills and capacity. I also suggested it would be helpful to encourage authorities to seek to create inclusive and representative fire and rescue authority boards. I also noted that it may be helpful to consider alternative approaches from elsewhere to encourage opportunities for fire and rescue authorities to employ the best talent and secure a more diverse senior leadership team.

- 22 In my response I also commented that it would be helpful if the proposals in the White Paper were accompanied by an updated National Framework for Fire and Rescue Services. I highlighted the need for more detailed consideration of how the proposed changes tied in with a greater focus on the Wellbeing of Future Generations (Wales) Act 2015 and fire and rescue authorities' responsibilities under this.
- 23 Informed by some of the issues and risks set out above as well as highlighted through my audit work, I have prioritised governance of fire and rescue authorities as one of a limited number of local government studies that I undertake each year. In deciding to undertake a study of this scale, I was also cognisant that whilst principal councils have been the subject of recent legislative reform, this has not been the case for fire and rescue authorities. This study is in addition to my annual programme of financial and performance audit work that is funded from audit fees. I had already identified a need to undertake this study prior to the commencement of the Culture Review undertaken in South Wales Fire and Rescue Authority.
- 24 My study of fire and rescue authority governance is in progress, and I intend to publish the findings of this study in July 2024. It would be premature to provide an indication of the findings of this study at this stage as the study team are still in the process of gathering evidence.

Future Audit Work

- 25 I intend to continue with my Local Government Study into the governance of fire and rescue authorities. At present I am also planning to undertake local audit work focussed on the fire and rescue authorities' approach to targeted high-risk fire prevention.
- 26 Following the independent Culture Review Report into South Wales Fire Rescue Authority and the Welsh Government's subsequent intervention, this Committee's Inquiry and my ongoing study into the

governance of fire and rescue authorities, I will reflect on my planned audit work at the fire and rescue authorities.

- 27 This will include consideration of whether any additional audit work is necessary. In doing so, I will also continue to liaise with the Welsh Government, including the Chief Fire and Rescue Adviser and Inspector for Wales, and take into account any planned inspection activity.

March 2024

Introduction

1. The Welsh Ambulance Services NHS Trust welcomes the opportunity to provide evidence to the Equality and Social Justice Committee to support its inquiry into Fire and Rescue Services (FRS) in Wales. This evidence responds to the Terms of Reference outlined by the committee and focuses particularly on the inquiry elements detailed below:
 - The extent governance arrangements contributed to the failings identified in the SWFRS culture review.
 - 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.
 - 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.

2. In responding, the Welsh Ambulance Services NHS Trust can reflect only on its own experience and learning, recognising that it is not familiar with the detail of the governance and culture of fire and rescue services, beyond what is outlined in the recently published review into the South Wales Fire and Rescue Service. The Welsh Ambulance Services NHS Trust is an NHS organisation and, therefore, its governance arrangements are wholly different from those of fire and rescue services. It is in this spirit that this evidence submission is made.

3. The Welsh Ambulance Services NHS Trust (WAST) provides healthcare services for people across Wales, delivering high quality and patient-led clinical care, wherever and whenever needed. WAST attends more than 250,000 emergency calls a year, more than 50,000 urgent calls and transports more than 1.3 million non-emergency patients to some 200 treatment centres throughout Wales and England. Its dedicated people are the organisation's biggest asset, comprising around 4000 employees and 1000 volunteers. WAST is also the provider of the national 111 service.

Welsh Ambulance Service: Culture and Cultural Reform

4. Following an externally facilitated cultural audit and an initial survey that explored the climate of sexual safety in the autumn of 2022, the Welsh Ambulance Service has committed to cultural reform, leadership development and improving psychological safety across the organisation.
5. The audit and survey confirmed that, in line with many other organisations, the Welsh Ambulance Service has work to do to ensure its workplace culture is one in which everyone is able to thrive. It is acknowledged that poor behaviour may have been tolerated in the past, but is not, nor ever has been, acceptable.
6. In order to bring staff along on a journey of cultural reform, it is important to focus on education and support, pro-actively addressing poor behaviour where there is clear harm but looking to achieve a genuine cultural shift which is not predicated on fear of retribution, but on reflection and learning. Processes and policies were already in place to investigate concerns raised, but it was clear that the absence of a safe to speak up culture which includes a lack of trust from

affected colleagues, was having a silencing effect. From listening to affected colleagues, the organisation has learned and understood that dominant social norms have normalised discriminatory behaviour masked as banter, perpetuated by the strong sense of identity and belonging present in ambulance service culture that can create fear of social rejection.

Creating Space, Building Trust & Listening

7. The Welsh Ambulance Service has responded to that cultural audit through a commitment to empowering and amplifying the voices of lived experience, achieved through the launch of an employee-led network (inclusive of students and volunteers).

8. The purpose of the network and appointment of advocates is to embrace survivor leadership, enable a learning approach to change throughout what is a geographically dispersed organisation, better understand and remove barriers to speaking up, identify harmful power imbalances, signpost to appropriate support, and provide a safe space for colleagues to be seen and heard. More broadly, the WAST Voices Network represents a range of different perspectives, experiences, harnesses the spirit of inclusion and plays a key role in the move towards cultural maturity.

Organisational Learning and Approach

9. In recognising the impact that certain incidents may have had on individuals, a sincere and unreserved apology has been extended by the Trust Board. In so doing, the intention is not to be defensive but to genuinely acknowledge and learn from these experiences. This acknowledgment is a crucial step in fostering a culture of trust and collaboration within WAST. By taking ownership of organisational shortcomings and committing to continuous improvement, the aim is to build a workplace where everyone feels secure, respected, and

supported. This journey of introspection and accountability is a vital aspect of the broader efforts to create a workplace that is not only safe but truly inclusive and empathetic, as clearly demonstrated in the Trust's People and Culture Plan.

10. Drawing on ideas for improvement shared through the survey and nudge science, the WAST Voices Network and Organisational Development Team have introduced a range of different interventions, including a new Freedom to Speak Up process (including an anonymous reporting platform), reverse mentoring (connecting senior leaders with lived experience), Empowerment Pairs (mentoring to support colleagues experiencing imposter syndrome and improving confidence), the development of sexual safety guiding principles, a poster campaign, the launch of a podcast which delves into societal themes and their link to the workplace, hosting regular guest speaker events, the delivery of bespoke learning sessions that include active bystander training and facilitating topical group discussions at all new colleague welcome events.

11. It is also recognised that these interventions do not just apply to improving the climate of sexual safety, but also support the organisation's efforts to improve the working environment of all staff, foster improved relationships between managers and staff and improve employee satisfaction and staff retention. It is recognised that this is a long-term process and that this cultural shift will take a significant length of time.

Governance and Accountability

12. The WAST Board and Executive Leadership Team (ELT) have been fully informed and supportive of this work and were key in commissioning the listening exercise conducted in 2021 that surfaced issues within the service of bullying and harassment. The recommendations from that report lead to the sexual

safety survey and ELT was fully briefed from an early stage in relation to the significant themes arising.

13. The approach to creating space for listening and being guided by those affected by the issues has ensured open communication channels and ownership of issues with the service. Over the course of the last three years, this has shaped the Board development programme, ensured frequent discussion at a senior level, and the development of cultural metrics, both qualitative and quantitative, to demonstrate meaningful culture change. There was a conscious decision to move away from establishing a discrete and concrete action plan devised by senior leaders, but to engage in a dynamic process co-created with our Voices Network.

14. The cultural metrics and themes have multiple appropriate reporting mechanisms. The People and Culture Committee receives quarterly updates on the themes, amongst other people and culture metrics; the Chief Executive, Non-Executive Director lead for people and culture and the Director for People and Culture, receive quarterly Guardian reports. ELT has monthly updates on cultural metrics, alternating between quantitative and qualitative each month and including measures looking at EDI issues, recruitment, employee relations and absence for example.

15. The pivotal role of our Chief Executive and the unanimous endorsement from the Trust Board have been instrumental in driving a commitment to improving the organisation's culture. Senior leaders have taken a bold stance in championing this cause and their unwavering support is not merely symbolic; it is a tangible expression of the organisation's commitment to cultural transformation. Recognising the need for open and candid discussions, podcasts have been developed, focussing on conversations about sexual safety

featuring directors, fostering an environment where insights and learning can flow freely.

16. As part of the speaking up culture, the Chief Executive, lead Freedom to Speak Up Safely Non-Executive Director (NED) and Director of People and Culture receive a verbal and written update directly from the lead Guardian about key themes and patterns of reporting through the various routes to speak up. This is a key National Guardian's Office (NGO) recommendation and also a key recommendation from other cultural reviews to ensure senior leaders are aware of themes. In addition, the Director for People and Culture also has monthly conversations with the CEO to discuss themes that arise from EDI, Culture and People Services teams.
17. The Trust's People and Culture Committee has a keen focus on issues of culture, receiving regular reports and conducting deep dives on culturally related issues in order that Committee members, and the wider Board, can scrutinise work in this area and seek the relevant assurance.
18. The removal of traditional hierarchies and boundaries underscores the Trust's commitment to listening and learning from every level of the organisation. This approach has facilitated a more inclusive and collaborative atmosphere, allowing for the exchange of ideas and experiences without fear of retribution. The endorsement of the Trust Board is not just a top-down directive; it is a collective and genuine commitment to driving positive change. The Board's active involvement in dismantling barriers and fostering open communication reflects the organisation's ethos of shared responsibility and collaborative leadership in pursuit of a safer and more inclusive workplace.

19. The Welsh Ambulance Service's Executive Leadership Team, Board and People and Culture Committee all hold space for discussion, support and learning, particularly in relation to areas where they may be unaffected. The lived experience presentations and case studies from colleagues and service users are carefully considered with rationale as to the impact on the person presenting, including consent and recognition of the potential power imbalance and any detriment in participating; and careful recording of outcome and follow up. The NGO mantra of Speak Up, Listen Up, Follow Up provides a useful framework.

Broader Learning

20. Owning the problem in its entirety, no matter how uncomfortable that has been, was WAST's starting point for change. Organisations that have previously committed to 'stamping out' such behaviour have failed, as demonstrated in the [Casey](#), [Afzal](#) and [Atherton](#) reports. Cultural awakenings are continuing to take place across different industries and sectors, largely driven by Generation Z (people born between 1997-2012) activism. A healthcare contextual factor also influencing how awareness is raised throughout the organisation, is a belief that shifting attitudes will have a positive impact on patient care and the overall [gender health gap](#) in Wales.

21. The Trust has been open and transparent throughout the journey so far and took a proactive approach with the media to demonstrate our commitment to positive change, working with [BBC Wales](#) to highlight this work in August 2023. The organisation has been recognised by an extensive range of external stakeholders including the Health and Care Professions Council (HCPC), the College of Paramedics, and the Association of Ambulance Chief Executives as leading the sector with the approach and commitment to future-proofing the

Welsh Ambulance Service's culture by taking full ownership of the past and present.

22. WAST is committed to an ambulance sector-wide approach to [Reducing Misogyny & Improving Sexual Safety](#). The Association of Ambulance Chief Executives recently provided oral evidence and submitted [written evidence](#) which highlights increasing concerns, to a UK Parliamentary call for submissions.

Conclusion

23. The Welsh Ambulance Service's key learning has been about owning the findings and apologising to those affected, the importance of leadership in all areas of the organisation, engagement in discussions, reflection and creating space, but above all listening and accepting that, as an organisation, there is some distance still to be travelled.



Fire and Rescue Services Association Response:

SUBMISSION TO EQUALITY AND SOCIAL JUSTICE COMMITTEE

Enquiry into the fire and rescue services

Introduction

We are very pleased to offer a written submission to the inquiry regarding the governance of the Fire and Rescue Service in Wales. By way of background, our union was founded in 1976. The Fire and Rescue Services Association (FRSA) is a United Kingdom wide, independent, member-led trade union representing other public-spirited individuals who are primarily On-Call firefighters. In 2018 the union changed its name from the Retained Firefighters' Union (RFU) to the FRSA to take account of the fact that our membership had been widened to welcome other fire service employees (grey and green book staff) who are more aligned with our values, our professional approach to negotiating local terms and conditions and how we positively and pragmatically represent our members at local and national level.

We ourselves are a broad-church, representing a wide range of political views, but with a common commitment to serve the local and national communities. For this reason, we have agreed not to exercise our right to strike, as our members cannot, in clear conscience, place their communities at risk by withdrawing their professional services.

In relation to our response, we will follow the terms of reference as set out by the inquiry.

1. The extent governance arrangements contributed to the failing identified in the SWFRS culture review.

The review undertaken into the SWFRS was amongst the most detailed into the operations of a fire and rescue service. The FRSA have had long-held concerns regarding the governance of fire and rescue services. These concerns are fourfold and repeated throughout the United Kingdom. The review did not highlight specific issues with the authority, so our response is based on our extensive experience of governance arrangements across the United Kingdom.

Size of authority

There has been a longstanding tradition of fire and rescue authorities to be large. While in theory this should allow a diversity of views, in reality, meetings become unwieldy, often incoherent, and few people speak on a regular basis. Accountability is diluted and lost in the sheer numbers. Important issues are often not discussed in a coherent manner, and members themselves often feel that they are having little impact upon the operation of the service itself. Smaller groups of people who would be able to dedicate their local authority work into more discrete areas would be better than the current arrangement in South Wales.

Lack of Expertise

The situation arising in all fire and rescue services, is that the authority is required to hold the chief fire officer and their leadership team to account, yet the chief fire officer acts as the professional adviser to the authority itself. Too often the role of holding the senior leadership team to account becomes seriously diluted. Many members overly rely on the information provided before them and offer little or nothing in the way of direct challenge. On the rare occasions where this does happen relations can break down. In South Wales the authority clearly lacked expertise in the running of fire and rescue services, and soon found themselves out of their depth when the current difficult situation arose – otherwise Commissioners would not have been appointed. They would have benefited from an independent source of advice assisting them in the questions they should ask, and the answers they would expect. Fire authorities themselves are vulnerable to falling prey to vested interests within the service or elsewhere who seek to influence change to their benefit. In many cases this helps to make the senior leadership team's task easier, as they are not required to confront radical options and alternatives.

Understanding of role

It is clear that many fire authorities, including the South Wales authority, have a misunderstanding of their role. They are often encouraged to be in 'partnership' with the senior management team, or act as 'critical friends'. They are in fact ultimately responsible for the proper running of the authority and need to act appropriately. This requires difficult questioning and a dogged attempt to obtain answers to concerns. Too often the chair becomes too entangled with senior leadership team. They should not be friends but should maintain a cordial but critical distance.

Distance from the fire and rescue service

For many fire and rescue authority members there is little or no contact with those firefighters who operate the service. The members may well enjoy the kudos of ceremonies and special events, but they are often not open to direct approaches by concerned members of staff, or even members of the public. They do not engage with staff networks or open themselves for discussion on a regular basis with station staff in the absence of senior management. Serious misdemeanours occur without those who should be holding the senior management team accountable being aware of them.

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

The evidence is crystal clear. FRAs as currently constituted, do not have the capacity or ability to deliver cultural change. The first barrier to this is the understanding of what cultural change is needed. Many fire authority members consider that the fire service is in a reasonable place. They find the male dominance of services, and the disciplinarian regime, reassuring. They have an old-fashioned view of emergency services no longer shared by their counterparts in the ambulance service, police or military. Many of those who are members of authorities are well-meaning amateurs, with no experience of driving through cultural change in any organisation, let alone an emergency service. Focus on change is lost, as fire authority members will tend to defend the service rather than challenge it. Those who do are often identified as mavericks and ostracised.

3. The failure of previous attempts at reform exploring the barriers that prevented implementation of previous review, specifically the Commission on Public Service Governance and delivery, which called for the reconstitution of FRAs.

In 2014 the Commission said:

‘Fire and Rescue Authorities cannot both manage services and scrutinise their delivery. Although we are sure that members of the authorities are committed and enthusiastic, it is asking too much to expect councillors to provide meaningful strategic leadership of a professional uniformed emergency service. Nor can they provide effective scrutiny of a service for which they are legally responsible, or for decisions which are taken in their name.’

These facts have been well-known in the fire and rescue world for many years. We believe the barriers to reform are clear. Vested interests – local authority members who do not wish to lose control of their positions; chief fire officers who enjoy the lax governance arrangements; those unwilling to change duty systems or broaden roles as the current system inhibits development of the firefighter role; those in other emergency services who do not wish to become too closely aligned with fire and rescue service, which they see as tainted; other emergency services whose leaders are unwilling to explore the full benefits of collaboration. Governments have recognised the need for reform but have failed in effective implementation.

In England there was a move towards regional fire and rescue services, which while not without difficulties, was generally seen as a positive step – but this failed. The government encouraged fire and rescue mergers – however these were few and far between – and as seen in Dorset and Wiltshire did not necessarily result in better governance; Police Fire and Crime Commissioners (PFCCs) in England were introduced, but overall, the results have varied from the bizarre, to the banal, to the reasonable. They have certainly not produced the ‘step changes’ the government envisaged. Merging police with fire governance does not work – it is too big a task.

The oversight of PFCCs has been set as deliberately weak, so as not to undermine their electoral mandate. However, that mandate is weak, and the PFCC role is little understood.

In Scotland a national fire and rescue service was created, however, its performance has not been strong in governance terms. Mayors have started to figure more in governance arrangements – but they have shown little inclination for radical change. Clearly with a variety of governance types doing poorly there is something much deeper at work. Ultimately it is the quality of leadership, the lack of diversity throughout the organisations, the lack of proper accountability, and barrier creating organisational structures such as the UK wide National Joint Council which actively inhibit change.

4. How the Welsh Government's 2018 consultation on reform of Fire and Rescue Service 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.

The progress report from 2019 makes depressing reading. It is a service largely devoted to service delivery, with little vision for expanding its role as part of the wider emergency service family. The progress report itself reflects a litany of problems – too many to repeat here. Given it is five years old, little has since improved. Piecemeal reform and statements of ambition are clearly no longer tenable.

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

Currently the adviser operates inspections on a thematic basis. In England His Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) work on the basis of individual fire and rescue authorities, but will also undertake thematic investigations. We do not consider that the adviser has the resources for in-depth inspection. We also consider that in smaller areas, there is a danger of inspectors becoming too close to the services they are inspecting.

In England HMICFRS has been criticised for missing serious failing within fire and rescue authorities. Part of this problem seems to rest with too many people coming from within the fire and rescue service as part of the team. We have, based on our experience, warned against this in the past but have been ignored.

Audit plays an important part of inspection of fire authorities, but demarcation lines need to be defined between technical and financial investigation, and they need to work closely together. The Commission itself spoke of overlapping responsibilities of inspection bodies, and the inherent inefficiencies. Their activities need to be closely aligned.

Overall, we would suggest keeping the adviser role separate to inspection, and undertaking inspections on an area basis by HMICFRS, but with clear guidelines developed by the Welsh government.

6. The effectiveness of mechanisms for ensuring that evidence collected through inspections and reviews of the 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.

The Commission of Public Service and Governance said:

'We heard too that whilst audit, inspection and regulation can effectively identify the need for change and improvement, organisations do not always respond well or effectively to this. We were told that organisations may choose to ignore or deny the validity of findings and fail to act on them; recent failures of services or in organisations substantiate this.'

The reality across the UK is that there are no mechanisms to ensure that inspections are acted upon or recommendations are followed up. Recommendations in England that come through the inspectorate and independent reviews are left in the hands of fire and rescue authorities, who have neither the expertise or capacity to follow up.

There are no sanctions for not taking forward recommendations; the main dangers are reputation, and history has shown fire and rescue authorities pay scant attention to these until they become overwhelmed by public outrage. Similarly with government reports, there is usually no follow-up action.

Big ticket issues may be taken forward – but many, if not most recommendations, are left in abeyance, and left to gather dust once the next issue arises. The National Fire Chiefs Council has a general advisory role, but this is ad hoc, and it has no remit to comment on individual fire and rescue service's performance. Its work is largely done in private, and much of it is hidden from view behind protected areas on its website.

The Local Government Association produces reports and strategies, but they are high level, and of little practical use; in any event they are not followed up, and often repeated every few years. The National Joint Council for Fire and Rescue Services (NJC) also produces documents, again at high level, generally not of any practical use, and certainly not followed up in any systematic manner. The HMICFRS would like a wider role in ensuring follow-up action, but its credibility at the moment is dented, and we can see no particular benefit in extending its role further.

Conclusions

The fire and rescue services across the United Kingdom are currently mired in a sorry state, and Wales is not immune. Serious reports regarding cultural issues have been published recently in Dorset and Wiltshire, London Fire Brigade and latterly South Wales. Reported concerns have been raised in the national media regarding cultural standards in North Wales.

These build on fire and rescue performance criticisms in terms of the Manchester Arena outrage, and the Grenfell Tower tragedy. In England a patchwork quilt of governance arrangements has resulted in a lack of cohesion amongst fire and rescue services, not least in relation to important matters such as training, cohesion and

cultural reform. Responsibilities are spread across a number of bodies, with primary responsibility resting with fire and rescue authorities, who are clearly not up to the task.

The National Joint Council (NJC) for Fire and Rescue Services, responsible for national pay and conditions, tends to lean towards maintaining stability in the sector rather than progressing innovation, it certainly does not address the needs of Wales, with its particular mixture of densely populated urban areas, and remote rural areas.

There is no magic bullet to resolve these problems, but they have to be addressed or they will continue to grow. Controversy after controversy now occurs on almost a monthly basis, and it will continue to occur destroying both trust and reputations.

We would suggest that the following should be put in place:

- i) Area based inspections, with a clear and robust remit from the Welsh government as to what is to be inspected.
- ii) Station audits should be regularly undertaken.
- iii) The adviser role should be independent of the inspection process but be responsible for monitoring progress on inspections.
- iv) Inspectors should be drawn from a wide area of expertise, drawing on fire expertise only where necessary.
- v) Inspection teams to be drawn from a wider area than Wales, to ensure that they do not get drawn too close to those being inspected.
- vi) A standing body should be put in place to monitor progress on recommendations arising from inspections and elsewhere.
- vii) A Wales only NJC should be created, with wider trade union representation, focussing on the specific needs of Wales, and with the removal of the anachronistic processes of the current NJC.
- viii) Work should be put in hand to create an all-Wales fire and rescue service, with a small board consisting of experts appointed by the Welsh Government who will hold the national Chief Fire Officer and his team to account.
- ix) A substantial research and development budget should be set aside to support the new organisation.
- x) Clear expectations of emergency collaboration should be set by the Welsh Government and progress towards full collaboration effectively monitored.

Ends

Tristan Ashby
Chief Executive Officer

07 March 2024

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.

Please see the response on behalf of Women in the Fire Service.

We would like to thank you for the opportunity to respond to the questions raised in your recent correspondence. Whilst we will not be able to comment on each area specifically, please see our response and are happy to discuss further if required.

WFS would not comment on a particular governance structure or constitutional arrangement that is in place and whether it is a barrier to culture change; however we have seen reports from across the fire sector where issues are within FRS's with a range of governance arrangements, is it less about the governance arrangements and more regarding the entire institution that is the barrier. It is important that any fire and rescue authority and Chief Fire Officer must want to lead reform and culture change and the Chief Fire Officer must be given the full support of resources and political leadership to achieve this, sufficient scrutiny should also form a part of these arrangements, accountability of progress is key to delivering change.

Inspection within England has highlighted the need for culture change and this is now a priority focus for fire and rescue services and the sector as a whole. WFS has seen an increase in the level of engagement with our training and development events locally and nationally. WFS are now a key stakeholder within the National Fire Chiefs Council being involved in national events and most recently the first menopause event hosted by the NFCC in September 2023. Whilst WFS have been questioning for decades the need for change and supporting women throughout this time, there is now a clear national and collective drive for culture change within the fire sector.

WFS continues to be an not for profit organisation that is here to enable and inspire confident and successful women. We also aim to build a more progressive Fire and Rescue Service and this certainly extends to supporting our amazing men to be the best allies they can be. Our reach is international and we would continue to welcome all our Welsh services to recognise WFS as a resource to support the improvement of equity and inclusion.

Kindest regards

Kathryn

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Working together to make Cornwall safer

