

For the attention of Ms Lisa Rees  
Fire and Rescue Services Branch  
Welsh Assembly Government  
Rhyd-y-Car  
Merthyr Tydfil  
CF48 1UZ

Dear Lisa

**DRAFT NATIONAL FRAMEWORK FOR FIRE AND RESCUE SERVICES 2008 - 2011**

Please find below North Wales Fire and Rescue Authority's response to the draft Fire and Rescue Service National Framework for Wales 2008 – 2011.

We would firstly like to say that reviewing the draft has been simplified by the style and logical structure of the document which makes the content easy to follow, and we congratulate the compilers on its production.

In terms of content, we welcome the high level strategic intention of the framework, and the emphasis on having local decision-makers design services for and with local communities. This being the case, whilst agreeing now in principle to high level proposals, we look forward to being able to tailor the more detailed roll-out of policies to suit our own local circumstances over the duration of the framework.

We particularly welcome the emphasis placed on building local solutions, but we also recognise that as part of the Welsh public sector, collaboration and pooling resources will necessarily feature strongly in our local solutions.

It may be helpful at this point to draw your attention to the section entitled 'Achieving the Vision' which contains a different first priority, which is to develop and deliver policies that have been formulated on an all-Wales basis rather than with constituent authorities or other authorities serving the same population as ourselves. We assume this is simply a drafting issue, rather than an intentionally different strategy.

**Strategic Priorities**

The three priority areas described in the introduction (an integrative, participative and collaborative approach; a strengthened equality and diversity agenda; and delivering resilience capability) identify that to best serve local communities, FRAs will need to continue to work with other public sector bodies and other FRAs. NWFRA is already committed to this, and is proud of its success in building genuinely effective collaborative partnerships and strategic alliances.

The three priority areas also correctly acknowledge that communities in each FRA area have distinctive profiles, and that what works in one part of Wales will not necessarily be effective or appropriate in another. Conversely, of course, terrorist threats will not

differentiate between areas, and the draft framework rightly emphasizes the need to maintain a national resilience capability.

NWFRA supports the Assembly Government's vision for FRAs expressed in Part A, and looks forward to increasingly raising the Fire and Rescue Service's profile. We particularly welcome the recognition that FRAs' influence spreads far beyond fire and rescue services, and that they make a significant contribution to: the health and wellbeing of citizens of all ages, cultural and social backgrounds; education, training and employment; developing the economic attractiveness of Wales as a place to do business; progressing environmental and sustainability agendas; social inclusion; and building a modern and vibrant nation.

### **Governance and Leadership**

The role of both members and officers in leading the delivery of fire and rescue services is well described, but the reason that is presented for the recommendation that Members should build their knowledge and expertise (to "avoid over-reliance on senior officers") is perhaps deflecting the focus away from the fundamental point that the overall purpose of this development in reality is to enable members to play a full and active role in strategically directing the Service taking full account of the professional advice provided by officers.

We have also been surprised by the number of new elements that the new framework seeks to introduce into local Risk Reduction Plans (RRPs). Having only recently published 'Wales a Safer Country', it appears that new requirements are already being introduced ahead of any formal review of the guidance. Whilst accepting that incremental changes can be beneficial, we are concerned that the number of issues being proposed now for inclusion in RRPs every year (e.g. sustainability agenda, equality progress reviews) is running ahead of agreed policy. Apart from the practical implications of introducing these, we fear that this may lead to confusion, not least in terms of assessment of whether RRPs have been prepared and published in accordance with the published statutory guidance.

Furthermore, in welcoming a clearly set-out document, we are nevertheless concerned at what we consider to be some overly prescriptive actions listed in Part B that would be best left to local determination.

Similarly, the specific requirement to discuss the content of the Authority's RRP/Action plan "informally" with the Assembly Government twice a year during its production seems extraordinary. Given that the Assembly would in any case be consulted on the draft, that its own RRP guidance document has now been published, that auditors will make an independent assessment of the RRP's appropriateness, and that the Assembly ultimately has the power to intervene in cases of potential or actual failure, we have to question what additional benefit there is to be gained from these two additional informal discussions.

We would also be interested to know how it is intended that the Fire and Rescue Community Safety Committee will operate. It appears from the array of actions allocated to it in Part B that there will be some significant resourcing implications,

especially on some of the more complex research projects. For example, it will need to be able to deal with the workload associated with the relationship between home fire safety checks (HFSC) activity and the Risk Reduction Planning (RRP) process, the effectiveness of fire safety awareness-raising on statutory compliance (both by March 2009), the effectiveness of measures on the incidence of deliberate outdoor fires, issues around violence against firefighters, to report and advise on AFA activity and policy, to devise an implementation plan for promoting co-responder schemes. The list is long and varied, but it is by no means a complete list of all the proposals, and adequate skilled resources and effective chairmanship will be needed to ensure that the members of the committee are sufficiently supported if they are going to deliver the ambitious action plan on time. The frequency and location of meetings is also important to consider in order to ensure that all members of the committee are able to participate effectively.

As regards the provision of "independent advice", it might be helpful to consider initially what exactly the advice needs to be independent of. Political stance? A perspective more appropriate in the English context? It may be that no single source of advice is going to be entirely free of some element of bias, whether consciously or not, and that in complex situations, having the ability to draw conclusions openly from a range of viewpoints is perhaps more important than technical expertise per se.

### **Strategic Capability**

NWFRA welcomes this confirmation that the key to effective delivery lies in sufficient resourcing. Wales's adopted strategy is to pool resources, work collaboratively and jointly commission services, and although we accept that this forms part of strategy for the foreseeable future, we do not accept that this should necessarily form part of the ultimate vision to be worked towards in the longer term.

Within the wider 'public service family', FRAs make an immense contribution to the safety and wellbeing of citizens at very little cost when compared to other parts of the public sector. However, as the majority of NWFRA's employees are retained firefighters, the potential to share and pool human resources is by definition limited.

Therefore, given that FRAs have such a wide remit but have access to only limited resources and (by comparison) small budgets, it would be helpful to receive some indication of how the Assembly could provide additional support to enable FRAs to take on more of a leading or directing role in partnerships.

It would also be helpful were the Assembly to initiate research into clarifying where responsibility would be seen to lie if things should go wrong in partnerships – accepting responsibility for indemnifying against failure or claims against all partners in a partnership will become increasingly complex to cost and secure, and there is a risk that individual authorities may be ill-equipped to deal with this.

In relation to sharing physical resources, we assume this relates to buildings, and to appliances and crews being sent to attend 'over the border' emergency incidents. However, it would be helpful to have confirmation that there is no intention to require NWFRA's physical resources more generally to be shared between FRAs. In addition,

the reference in Part B to mutual arrangements for supporting gold and silver command with England is complex, and is not something that we envisage would happen in reality.

We generally support the expectation that the fire and rescue service should become bilingual, especially in light of the far-reaching expectations in the One Wales strategy that Wales as a whole should become increasingly so. However, the additional resources required to increase the bilingual skills of existing staff or of reducing the risk of failing to recruit sufficient new staff with the necessary linguistic skills are not considered.

### **Service strategies**

In relation to procurement strategies, given the limited number of suppliers for some specialist vehicles and equipment, concentrating solely on securing efficiencies without giving sufficient thought to business continuity planning and security of supply chains could unintentionally increase risk. The Assembly may therefore wish to consider more fully its expectations in this regard.

The draft document contains some specific references to other strategies and policies that FRAs must adopt and/or comply with. However, not all are clear, the impact on NWFRAs of adopting these has not yet been assessed, and we can therefore anticipate that some flexibility may be needed, which might usefully be reflected in the language of Part B of the draft framework. Examples of this are adopting the 'All-Wales HR strategy' (p. 38) and reaching Level 3 of the Value Wales Sustainable Procurement Assessment Framework (p. 34).

### **Value for Money**

Achieving value for money by streamlining support functions is only one means of increasing efficiency. We consider that this should not be confined to support functions, many of which are already provided in NWFRS by very small teams of people. The drive for increased efficiency must surely apply right through and across organisations. The fact that front line services are outward facing does not necessarily mean that there is no room to streamline or improve in order to achieve value for money.

We look forward to the publication of the final version of the Fire and Rescue Service National Framework for Wales 2008-2011, and trust that our comments will have been helpful in its compilation.

Yours sincerely

Chair  
North Wales Fire and Rescue Authority