

Reform of Fire and Rescue Authorities in Wales –

Consultation reform of the Fire and Rescue Authorities in Wales governance and funding arrangements

Consultation Responses 1 to 30

Response 1

Reform of fire and rescue authorities in Wales

Submit your response

Q1. 1. Do you agree the objectives for reform are appropriate and important?

Yes

Comments:

Please take into account that the border is only a line on the map.

Q2. 2. Are there other objectives that the reform programme should pursue?

No Response

Q3. 3. Do you agree that Fire and Rescue Authorities (FRAs) should remain as separate and distinct entities, with the same boundaries as now?

No

Comments:

Emergencies require co-operation

Q4. 4. Do you agree that transferring control of fire and rescue services to Police and Crime Commissioners or local authorities would not be appropriate?

No

Q5. 5. Do you agree that there are legitimate but limited national interests in the Service that need to be reflected in its governance arrangements?

Yes

Q6. 6. Do you agree that local authorities should continue to nominate FRA members?

Yes

Q7. 7. Do you agree that local authorities should nominate one FRA member each, drawn from their cabinets?

Yes

Q8. 8. Do you believe any changes are needed to the law on the size and remuneration of council cabinets, to allow their members also to serve on FRAs?

No

Q9. 9. Do you agree that FRAs should also have non-executive members?

Yes

Q10. 10. Who should appoint non-executive members of FRAs?

No Response

Q11. 11. Do you agree that, in the longer term, responsibility for the service should vest in a statutory Chief Fire Officer, with FRAs fulfilling a scrutiny and oversight role? If so, would that require any change to membership arrangements?

Yes

Q12. 12. Do you have any other proposals for how to reform FRA governance which meet the criteria in Chapters 1 and 2?

No Response

Q13. 13. Do you agree that FRAs and local authorities should agree the level of FRA funding each year, with a reserve arbitration power for the Welsh Ministers?

Yes

Q14. 14. Do you agree that, in the longer term, FRAs should have powers to set a council tax precept, with the balance of their funding from Welsh Government grants?

Yes

Q15. 15. Do you have any other proposals for how to reform FRA funding which meet the criteria in Chapters 1 and 2?

No

Q16. 16. Do you agree that the performance management system for FRAs should be grounded in the National Framework for Fire and Rescue Services?

Yes

Q17. 17. Do you agree with the need for such a system to give FRAs flexibility on planning and reporting cycles, and on the sources of information about performance that they use?

Yes

Q18. 18. Do you agree that the Welsh Ministers should retain their duty to report to the Assembly about delivery of the Framework, and their powers of intervention?

Yes

Q19. 19. We would like to know your views on the effects that the policy proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No Response

Q20. 20. Please also explain how you believe the policy proposals could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No Response

Q21. 21. We have asked a number of specific questions about FRA governance, finance and performance management. If you have any related issues which we have not specifically addressed, please use this space to report them.

No Response

Q22. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name

[REDACTED]

Organisation (if applicable) -

Q23. If you want to receive a receipt of your response, please provide an email address. Email address

[REDACTED]

Q24. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

Keep my response anonymous

Response 2

Reform of fire and rescue authorities in Wales

Submit your response

Q1. 1. Do you agree the objectives for reform are appropriate and important?

Yes

Q2. 2. Are there other objectives that the reform programme should pursue?

Ye

Comments:

I could see no evaluation of directly electing members. The consultation states in para 1.8 "Public bodies should therefore either be directly elected (as local authorities and the National Assembly are); or should be formally and clearly accountable to such bodies." I can see where the document tries to ensure accountability to LAs but I did not seem to see any suggestion of direct elections either for the "Governing Body" or the "Chief Fire Officer" if that role changes. Even if direct elections of any kind were to be dismissed they should be discussed in the document. Direct elections would appear provide the public accountability the document seeks and if they have been dismissed it would be good to see the reasons.

Q3. 3. Do you agree that Fire and Rescue Authorities (FRAs) should remain as separate and distinct entities, with the same boundaries as now?

No

Comments:

I believe more consideration should be given to creating an "All Wales" service. While in the short term I realise that costs increase but surely in the longer term there are cost savings, particularly in management costs. After all an all Wales service would serve a population similar to that of Greater Manchester or the West Midlands services.

Q4. 4. Do you agree that transferring control of fire and rescue services to Police and Crime Commissioners or local authorities would not be appropriate?

Yes

Comments:

Fire service should remain totally separate from the police.

Q5. 5. Do you agree that there are legitimate but limited national interests in the Service that need to be reflected in its governance arrangements?

Yes

Q6. 6. Do you agree that local authorities should continue to nominate FRA members?

No

Comments:

If there is no opportunity to directly elect FRA members then I believe that an open and well publicised system be organised to allow Government Ministers to appoint the best people for the posts available.

Q7. 7. Do you agree that local authorities should nominate one FRA member each, drawn from their cabinets?

No

Comments:

I think that this is a complicated matter. Cabinet members surely have enough on their plates in supporting the management of their own authorities and the need of their own constituents. Having two posts means that potential FRA members would have divided loyalties and less time for each of their important roles.

Q8. 8. Do you believe any changes are needed to the law on the size and remuneration of council cabinets, to allow their members also to serve on FRAs?

No

Comments:

If the proposal to allow LA cabinet members to be appointed to the FRA goes ahead then I believe a formal arrangement for the remuneration appointed to the role be considered. For example if the duties of the FRA take up 30% of the council members time then the LA should pay 70% of salary and the FRA 30%. I firmly do not believe that a public servant should be paid twice for their time in serving the community.

Q9. 9. Do you agree that FRAs should also have non-executive members?

Yes

Comments:

A clear definition of what is required in a NE member should be published and candidates should meet the requirements.

Q10. 10. Who should appoint non-executive members of FRAs?

The Welsh Government. This will ensure that people who meet the criteria are appointed and not just "jobs for the boys".

Q11. 11. Do you agree that, in the longer term, responsibility for the service should vest in a statutory Chief Fire Officer, with FRAs fulfilling a scrutiny and oversight role? If so, would that require any change to membership arrangements?

Yes

Comments:

Yes, and if the FRA is not to be elected I should like to see some consideration given to directly electing the CFO providing clear accountability to the public.

Q12. 12. Do you have any other proposals for how to reform FRA governance which meet the criteria in Chapters 1 and 2?

"Public bodies should therefore either be directly elected (as local authorities and the National Assembly are); or should be formally and clearly accountable to such bodies." The general public understand the first part of the quote, found in para 1.8 of the Consultation Document, but we as the public have very limited or no knowledge of the latter. We do not see this happening; it is not reported back to us.

Q13. 13. Do you agree that FRAs and local authorities should agree the level of FRA funding each year, with a reserve arbitration power for the Welsh Ministers?

Yes

Comments:

Yes this is public funding coming from the Welsh Government. If the FRA are not bodies directly reporting

Q13. 13. Do you agree that FRAs and local authorities should agree the level of FRA funding each year, with a reserve arbitration power for the Welsh Ministers?

to the WG then it is important for the WG to have a large say in the funding and its scrutiny. This helps with the public understanding of how the FRAs will be scrutinised and the WG MUST take responsibility for the effectiveness of bodies spending public money in Wales - this is part of its job! Keeping everything at arms length simply leads to the question of what the WG is for if it does not control public spending.

Q14. 14. Do you agree that, in the longer term, FRAs should have powers to set a council tax precept, with the balance of their funding from Welsh Government grants?

No

Comments:

If the WG does not have the ability to ensure LAs reduce their financial demands on their local tax payers then this will simply lead to local tax payers paying substantially more in local taxes.

Q15. 15. Do you have any other proposals for how to reform FRA funding which meet the criteria in Chapters 1 and 2?

No

Comments:

I believe that in such a small country the government should not be afraid of developing nationwide services and taking responsibility for them. It sometimes appears that the WG wishes to wash its hands of bodies spending public money and to say that it is local democracy in action. The public see this as avoiding responsibility and therefore any potential electoral damage; particularly as the public sees the WG as the body that represents them in obtaining local democracy as unelected bodies spending public money are unaffected by public concerns.

Q16. 16. Do you agree that the performance management system for FRAs should be grounded in the National Framework for Fire and Rescue Services?

Yes

Q17. 17. Do you agree with the need for such a system to give FRAs flexibility on planning and reporting cycles, and on the sources of information about performance that they use?

Yes

Q18. 18. Do you agree that the Welsh Ministers should retain their duty to report to the Assembly about delivery of the Framework, and their powers of intervention?

Yes

Q18. 18. Do you agree that the Welsh Ministers should retain their duty to report to the Assembly about delivery of the Framework, and their powers of intervention?

Comments:

If these bodies are not to be directly elected then the WG should be the Body with the ultimate responsibility and powers to help, advise, scrutinize etc.

Q19. 19. We would like to know your views on the effects that the policy proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

If agreed guidance, rules, laws etc were effectively implemented we would have an exemplary service where Welsh would be treated equally with English. Unfortunately it is not the case. To ensure these new bodies not only take their responsibilities seriously but also ensure total implementation of all guidance etc I would suggest that a requirement for the members, or a designated proportion, to be Welsh speaking or to make a commitment to make a real effort to learn Welsh (to acquire an agreed working knowledge) within a specified time that would be scrutinized by the WG.

Q20. 20. Please also explain how you believe the policy proposals could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

If there is a serious attempt to meet the WGs target of 1,000,000 speakers by 2050 the WG itself needs to be making a knowledge of the language (or acquiring a working knowledge) requirements of sitting on such bodies as then people will see real advantages in using the language. Being bilingual in English/French, E/Chinese, E/Spanish etc. often attracts a premium payment in work; being bilingual in Welsh/English is not even considered to being bilingual or not equivalent to other skills.

Q21. 21. We have asked a number of specific questions about FRA governance, finance and performance management. If you have any related issues which we have not specifically addressed, please use this space to report them.

My only issue is ensuring that the WG takes full responsibility for oversight and scrutiny as the holder of the public purse.

Q22. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name Mr K Jones

Organisation (if applicable) -

Q23. If you want to receive a receipt of your response, please provide an email address. Email address

[REDACTED]

Q24. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response

Response 3

Reform of fire and rescue authorities in Wales

Submit your response

Q1. 1. Do you agree the objectives for reform are appropriate and important?

Yes

Q2. 2. Are there other objectives that the reform programme should pursue?

No

Q3. 3. Do you agree that Fire and Rescue Authorities (FRAs) should remain as separate and distinct entities, with the same boundaries as now?

Yes

Q4. 4. Do you agree that transferring control of fire and rescue services to Police and Crime Commissioners or local authorities would not be appropriate?

Yes

Comments:

I think the FRA should be accountable to which ever LA it covers

Q5. 5. Do you agree that there are legitimate but limited national interests in the Service that need to be reflected in its governance arrangements?

No

Q6. 6. Do you agree that local authorities should continue to nominate FRA members?

Yes

Q7. 7. Do you agree that local authorities should nominate one FRA member each, drawn from their cabinets?

No

Q8. 8. Do you believe any changes are needed to the law on the size and remuneration of council cabinets, to allow their members also to serve on FRAs?

No

Comments:

If I have read this question correctly, I believe a cabinet member as enough decision making for his/her local Authority and I totally disagree, there are back benchers that do not want to be executive members and rather go on Scrutiny panels in their own authority so that they can hold there own administration accountable please remember there are Backbenchers who would make very good Cabinet Members and also very good policy makers for their local authorities and constituencies and FRAs that they sit on

Q9. 9. Do you agree that FRAs should also have non-executive members?

No

Comments:

I feel they already have scrutiny Committees and I think if they find something wrong it would be their moral duty to correct any points they are not satisfied with, what's the point of having a non executive member who cannot make any decision

Q10. 10. Who should appoint non-executive members of FRAs?

If this proposal is passed, I do believe it should be someone who has first hand experience such as an ex firefighter and again I would say Local Authorities after all they do pay towards the service

Q11. 11. Do you agree that, in the longer term, responsibility for the service should vest in a statutory Chief Fire Officer, with FRAs fulfilling a scrutiny and oversight role? If so, would that require any change to membership arrangements?

Yes

Comments:

However No change in Membership arrangements

Q12. 12. Do you have any other proposals for how to reform FRA governance which meet the criteria in Chapters 1 and 2?

No Response

Q13. 13. Do you agree that FRAs and local authorities should agree the level of FRA funding each year, with a reserve arbitration power for the Welsh Ministers?

Yes

Comments:

FRAs and local authorities only

Q14. 14. Do you agree that, in the longer term, FRAs should have powers to set a council tax precept, with the balance of their funding from Welsh Government grants?

No

Comments:

This would all depend on how much the individual home owner would have to pay which I would find hard under the current situation of austerity

Q15. 15. Do you have any other proposals for how to reform FRA funding which meet the criteria in Chapters 1 and 2?

No

Q16. 16. Do you agree that the performance management system for FRAs should be grounded in the National Framework for Fire and Rescue Services?

Yes

Q17. 17. Do you agree with the need for such a system to give FRAs flexibility on planning and reporting cycles, and on the sources of information about performance that they use?

Yes

Q18. 18. Do you agree that the Welsh Ministers should retain their duty to report to the Assembly about delivery of the Framework, and their powers of intervention?

Yes

Q19. 19. We would like to know your views on the effects that the policy proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No Response

Q20. 20. Please also explain how you believe the policy proposals could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No Response

Q21. 21. We have asked a number of specific questions about FRA governance, finance and performance management. If you have any related issues which we have not specifically addressed, please use this space to report them.

No Response

Q22. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name Cyril Anderson

Organisation (if applicable) -

Q23. If you want to receive a receipt of your response, please provide an email address. Email address

[REDACTED]

Q24. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response

Response 4

Reform of fire and rescue authorities in Wales

Submit your response

Q1. 1. Do you agree the objectives for reform are appropriate and important?

Yes

Q2. 2. Are there other objectives that the reform programme should pursue?

Ye

Q2. 2. Are there other objectives that the reform programme should pursue?

Comments:

The reality is that the FRS role has changed. A smaller FRS to meet the new reality is required. Diversification into health and community resilience is valid but actually better done by others.

Q3. 3. Do you agree that Fire and Rescue Authorities (FRAs) should remain as separate and distinct entities, with the same boundaries as now?

No

Comments:

The national ambulance service responds to over ten times the volume of calls attended by three FRS. The FRS are disjointed offering different service models, especially around how retained systems are provided, with three authorities and three management structures. A single FRS for Wales would offer reduced costs.

Q4. 4. Do you agree that transferring control of fire and rescue services to Police and Crime Commissioners or local authorities would not be appropriate?

Yes

Comments:

The 4 police forces should be merged under a single PCC into police Wales using the Scottish model.

Q5. 5. Do you agree that there are legitimate but limited national interests in the Service that need to be reflected in its governance arrangements?

No

Comments:

These interests are not limited they are widespread. A national FRS is essential to provide high quality, consistent, efficient service.

Q6. 6. Do you agree that local authorities should continue to nominate FRA members?

No

Q7. 7. Do you agree that local authorities should nominate one FRA member each, drawn from their cabinets?

Yes

Q8. 8. Do you believe any changes are needed to the law on the size and remuneration of council cabinets, to allow their members also to serve on FRAs?

No

Q9. 9. Do you agree that FRAs should also have non-executive members?

Yes

Q10. 10. Who should appoint non-executive members of FRAs?

There should be single FRA for a national FRS with the same appointment process as used for NHS board non executive members.

Q11. 11. Do you agree that, in the longer term, responsibility for the service should vest in a statutory Chief Fire Officer, with FRAs fulfilling a scrutiny and oversight role? If so, would that require any change to membership arrangements?

No

Q12. 12. Do you have any other proposals for how to reform FRA governance which meet the criteria in Chapters 1 and 2?

No Response

Q13. 13. Do you agree that FRAs and local authorities should agree the level of FRA funding each year, with a reserve arbitration power for the Welsh Ministers?

No

Q14. 14. Do you agree that, in the longer term, FRAs should have powers to set a council tax precept, with the balance of their funding from Welsh Government grants?

No

Comments:

A single FRS would mean that a national precept could be set.

Q15. 15. Do you have any other proposals for how to reform FRA funding which meet the criteria in Chapters 1 and 2?

No

Q16. 16. Do you agree that the performance management system for FRAs should be grounded in the National Framework for Fire and Rescue Services?

Yes

Q17. 17. Do you agree with the need for such a system to give FRAs flexibility on planning and reporting cycles, and on the sources of information about performance that they use?

No

Comments:

FRS performance should have the same scrutiny as ambulance performance does

Q18. 18. Do you agree that the Welsh Ministers should retain their duty to report to the Assembly about delivery of the Framework, and their powers of intervention?

Yes

Q19. 19. We would like to know your views on the effects that the policy proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No Response

Q20. 20. Please also explain how you believe the policy proposals could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No Response

Q21. 21. We have asked a number of specific questions about FRA governance, finance and performance management. If you have any related issues which we have not specifically addressed, please use this space to report them.

No Response

Q22. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name

Richard Lee

Q22. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Organisation (if applicable) -

Q23. If you want to receive a receipt of your response, please provide an email address. Email address

[REDACTED]

Q24. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response

Response 5

Reform of fire and rescue authorities in Wales

Submit your response

Q1. 1. Do you agree the objectives for reform are appropriate and important?

Yes

Comments:

On the whole yes, but not all.

Q2. 2. Are there other objectives that the reform programme should pursue?

No

Q3. 3. Do you agree that Fire and Rescue Authorities (FRAs) should remain as separate and distinct entities, with the same boundaries as now?

Yes

Q4. 4. Do you agree that transferring control of fire and rescue services to Police and Crime Commissioners or local authorities would not be appropriate?

Yes

Q5. 5. Do you agree that there are legitimate but limited national interests in the Service that need to be reflected in its governance arrangements?

Yes

Q6. 6. Do you agree that local authorities should continue to nominate FRA members?

Yes

Q7. 7. Do you agree that local authorities should nominate one FRA member each, drawn from their cabinets?

No

Comments:

It could possibly exclude experienced members from being part of the FRA.

Q8. 8. Do you believe any changes are needed to the law on the size and remuneration of council cabinets, to allow their members also to serve on FRAs?

No

Q9. 9. Do you agree that FRAs should also have non-executive members?

No

Q10. 10. Who should appoint non-executive members of FRAs?

LA

Q11. 11. Do you agree that, in the longer term, responsibility for the service should vest in a statutory Chief Fire Officer, with FRAs fulfilling a scrutiny and oversight role? If so, would that require any change to membership arrangements?

No

Q12. 12. Do you have any other proposals for how to reform FRA governance which meet the criteria in Chapters 1 and 2?

No

Q13. 13. Do you agree that FRAs and local authorities should agree the level of FRA funding each year, with a reserve arbitration power for the Welsh Ministers?

No

Q14. 14. Do you agree that, in the longer term, FRAs should have powers to set a council tax precept, with the balance of their funding from Welsh Government grants?

No

Q15. 15. Do you have any other proposals for how to reform FRA funding which meet the criteria in Chapters 1 and 2?

No

Q16. 16. Do you agree that the performance management system for FRAs should be grounded in the National Framework for Fire and Rescue Services?

Yes

Q17. 17. Do you agree with the need for such a system to give FRAs flexibility on planning and reporting cycles, and on the sources of information about performance that they use?

Yes

Q18. 18. Do you agree that the Welsh Ministers should retain their duty to report to the Assembly about delivery of the Framework, and their powers of intervention?

No

Q19. 19. We would like to know your views on the effects that the policy proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No Response

Q20. 20. Please also explain how you believe the policy proposals could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No Response

Q21. 21. We have asked a number of specific questions about FRA governance, finance and performance management. If you have any related issues which we have not specifically addressed, please use this space to report them.

No Response

Q22. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name



Q22. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Organisation (if applicable) [REDACTED]

Q23. If you want to receive a receipt of your response, please provide an email address. Email address

No Response

Q24. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

Keep my response anonymous

Response 6

Reform of fire and rescue authorities in Wales

Submit your response

Q1. 1. Do you agree the objectives for reform are appropriate and important?

Yes

Q2. 2. Are there other objectives that the reform programme should pursue?

No

Q3. 3. Do you agree that Fire and Rescue Authorities (FRAs) should remain as separate and distinct entities, with the same boundaries as now?

No

Q4. 4. Do you agree that transferring control of fire and rescue services to Police and Crime Commissioners or local authorities would not be appropriate?

Yes

Q5. 5. Do you agree that there are legitimate but limited national interests in the Service that need to be reflected in its governance arrangements?

Yes

Q6. 6. Do you agree that local authorities should continue to nominate FRA members?

Yes

Q7. 7. Do you agree that local authorities should nominate one FRA member each, drawn from their cabinets?

Yes

Q8. 8. Do you believe any changes are needed to the law on the size and remuneration of council cabinets, to allow their members also to serve on FRAs?

No

Q9. 9. Do you agree that FRAs should also have non-executive members?

Yes

Q10. 10. Who should appoint non-executive members of FRAs?

Welsh Government

Q11. 11. Do you agree that, in the longer term, responsibility for the service should vest in a statutory Chief Fire Officer, with FRAs fulfilling a scrutiny and oversight role? If so, would that require any change to membership arrangements?

Yes

Q12. 12. Do you have any other proposals for how to reform FRA governance which meet the criteria in Chapters 1 and 2?

No

Q13. 13. Do you agree that FRAs and local authorities should agree the level of FRA funding each year, with a reserve arbitration power for the Welsh Ministers?

Yes

Q14. 14. Do you agree that, in the longer term, FRAs should have powers to set a council tax precept, with the balance of their funding from Welsh Government grants?

No

Q15. 15. Do you have any other proposals for how to reform FRA funding which meet the criteria in Chapters 1 and 2?

No

Q16. 16. Do you agree that the performance management system for FRAs should be grounded in the National Framework for Fire and Rescue Services?

Yes

Q17. 17. Do you agree with the need for such a system to give FRAs flexibility on planning and reporting cycles, and on the sources of information about performance that they use?

Yes

Q18. 18. Do you agree that the Welsh Ministers should retain their duty to report to the Assembly about delivery of the Framework, and their powers of intervention?

Yes

Q19. 19. We would like to know your views on the effects that the policy proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No Response

Q20. 20. Please also explain how you believe the policy proposals could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No Response

Q21. 21. We have asked a number of specific questions about FRA governance, finance and performance management. If you have any related issues which we have not specifically addressed, please use this space to report them.

No Response

Q22. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

No Response

Q23. If you want to receive a receipt of your response, please provide an email address. Email address

No Response

Q24. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response

Response 7

Reform of fire and rescue authorities in Wales

Submit your response

Q1. 1. Do you agree the objectives for reform are appropriate and important?

Yes

Q2. 2. Are there other objectives that the reform programme should pursue?

No

Q3. 3. Do you agree that Fire and Rescue Authorities (FRAs) should remain as separate and distinct entities, with the same boundaries as now?

Yes

Comments:

Existing arrangements are fit for purpose

Q4. 4. Do you agree that transferring control of fire and rescue services to Police and Crime Commissioners or local authorities would not be appropriate?

Yes

Q5. 5. Do you agree that there are legitimate but limited national interests in the Service that need to be reflected in its governance arrangements?

Yes

Q6. 6. Do you agree that local authorities should continue to nominate FRA members?

Yes

Q7. 7. Do you agree that local authorities should nominate one FRA member each, drawn from their cabinets?

Yes

Q8. 8. Do you believe any changes are needed to the law on the size and remuneration of council cabinets, to allow their members also to serve on FRAs?

Yes

Q9. 9. Do you agree that FRAs should also have non-executive members?

Yes

Q10. 10. Who should appoint non-executive members of FRAs?

Relevant orgs.

Q11. 11. Do you agree that, in the longer term, responsibility for the service should vest in a statutory Chief Fire Officer, with FRAs fulfilling a scrutiny and oversight role? If so, would that require any change to membership arrangements?

Yes

Q12. 12. Do you have any other proposals for how to reform FRA governance which meet the criteria in Chapters 1 and 2?

No Response

Q13. 13. Do you agree that FRAs and local authorities should agree the level of FRA funding each year, with a reserve arbitration power for the Welsh Ministers?

Yes

Q14. 14. Do you agree that, in the longer term, FRAs should have powers to set a council tax precept, with the balance of their funding from Welsh Government grants?

Yes

Q15. 15. Do you have any other proposals for how to reform FRA funding which meet the criteria in Chapters 1 and 2?

No

Q16. 16. Do you agree that the performance management system for FRAs should be grounded in the National Framework for Fire and Rescue Services?

Yes

Q17. 17. Do you agree with the need for such a system to give FRAs flexibility on planning and reporting cycles, and on the sources of information about performance that they use?

No

Comments:

Should follow National standards and not localised 'arrangements'

Q18. 18. Do you agree that the Welsh Ministers should retain their duty to report to the Assembly about delivery of the Framework, and their powers of intervention?

Yes

Q19. 19. We would like to know your views on the effects that the policy proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Difficult to amend or alter technical terms without creating confusion which could result in catastrophic consequences. e.g. when working with other services from 'over the border'

Q20. 20. Please also explain how you believe the policy proposals could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No Response

Q21. 21. We have asked a number of specific questions about FRA governance, finance and performance management. If you have any related issues which we have not specifically addressed, please use this space to report them.

No Response

Q22. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name Kenneth Williams

Organisation (if applicable) -

Q23. If you want to receive a receipt of your response, please provide an email address. Email address

[REDACTED]

Q24. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response

Response 8

Reform of fire and rescue authorities in Wales

Submit your response

Q1. 1. Do you agree the objectives for reform are appropriate and important?

Yes

Q2. 2. Are there other objectives that the reform programme should pursue?

No

Q3. 3. Do you agree that Fire and Rescue Authorities (FRAs) should remain as separate and distinct entities, with the same boundaries as now?

Yes

Q4. 4. Do you agree that transferring control of fire and rescue services to Police and Crime Commissioners or local authorities would not be appropriate?

Yes

Q5. 5. Do you agree that there are legitimate but limited national interests in the Service that need to be reflected in its governance arrangements?

Yes

Q6. 6. Do you agree that local authorities should continue to nominate FRA members?

Yes

Q7. 7. Do you agree that local authorities should nominate one FRA member each, drawn from their cabinets?

Yes

Q8. 8. Do you believe any changes are needed to the law on the size and remuneration of council cabinets, to allow their members also to serve on FRAs?

No

Q9. 9. Do you agree that FRAs should also have non-executive members?

Yes

Q10. 10. Who should appoint non-executive members of FRAs?

No Response

Q11. 11. Do you agree that, in the longer term, responsibility for the service should vest in a statutory Chief Fire Officer, with FRAs fulfilling a scrutiny and oversight role? If so, would that require any change to membership arrangements?

Yes

Q12. 12. Do you have any other proposals for how to reform FRA governance which meet the criteria in Chapters 1 and 2?

No Response

Q13. 13. Do you agree that FRAs and local authorities should agree the level of FRA funding each year, with a reserve arbitration power for the Welsh Ministers?

Yes

Q14. 14. Do you agree that, in the longer term, FRAs should have powers to set a council tax precept, with the balance of their funding from Welsh Government grants?

Yes

Q15. 15. Do you have any other proposals for how to reform FRA funding which meet the criteria in Chapters 1 and 2?

No

Q16. 16. Do you agree that the performance management system for FRAs should be grounded in the National Framework for Fire and Rescue Services?

No Response

Q17. 17. Do you agree with the need for such a system to give FRAs flexibility on planning and reporting cycles, and on the sources of information about performance that they use?

Yes

Q18. 18. Do you agree that the Welsh Ministers should retain their duty to report to the Assembly about delivery of the Framework, and their powers of intervention?

Yes

Q19. 19. We would like to know your views on the effects that the policy proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No Response

Q20. 20. Please also explain how you believe the policy proposals could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No Response

Q21. 21. We have asked a number of specific questions about FRA governance, finance and performance management. If you have any related issues which we have not specifically addressed, please use this space to report them.

No Response

Q22. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name

██████████

Organisation (if applicable)

██████████

Q23. If you want to receive a receipt of your response, please provide an email address. Email address

No Response

Q24. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

Keep my response anonymous

Response 9

Reform of fire and rescue authorities in Wales

Submit your response

Q1. 1. Do you agree the objectives for reform are appropriate and important?

No

Comments:

The present system stem is fit for purpose -why change ?

Q2. 2. Are there other objectives that the reform programme should pursue?

No

Q3. 3. Do you agree that Fire and Rescue Authorities (FRAs) should remain as separate and distinct entities, with the same boundaries as now?

Yes

Comments:

There is no merit in merging the 3 authorities/ fire services into a national force

Q4. 4. Do you agree that transferring control of fire and rescue services to Police and Crime Commissioners or local authorities would not be appropriate?

No

Comments:

The public do not think that the Police Commissioner scheme set up by Uk government is fit for purpose

Q5. 5. Do you agree that there are legitimate but limited national interests in the Service that need to be reflected in its governance arrangements?

Yes

Q6. 6. Do you agree that local authorities should continue to nominate FRA members?

Yes

Comments:

Currently the 6 constituent authorities of the M&WWFRS nominate representatives from across the political spectrum and they also represent the mix between rural and urban of the service Having one cabinet member from each authority would not give politically balance or that mix of rural and urban views. It is unbelievable naive that a executive board member would have sufficient time and interest to make interest in the running of the fire service given the time and effort they currently offer to their own portfolios

Q7. 7. Do you agree that local authorities should nominate one FRA member each, drawn from their cabinets?

No

Comments:

See above. naive suggestion from a lack of understanding of the work of an Executive board Member of an LA Their portfolio are large , complex and they would not have the time to fully scrutinise the work of the fire service

Q8. 8. Do you believe any changes are needed to the law on the size and remuneration of council cabinets, to allow their members also to serve on FRAs?

No

Comments:

Making the cabinet's larger is taking any real influence from the back benchers . The debate and discussion that are held within FA would be stagnated because Exec Board Members would not have time to fully spend on FA duties

Q9. 9. Do you agree that FRAs should also have non-executive members?

No

Comments:

Unsure as to what purpose non executive members are needed

Q10. 10. Who should appoint non-executive members of FRAs?

It seems that WG wants to control the Fire Authorities . The plan is to reduce the number of LA appointments & increase the appointment of WG appointees so that WG control and ultimately take over the FA &Control the budget

Q11. 11. Do you agree that, in the longer term, responsibility for the service should vest in a statutory Chief Fire Officer, with FRAs fulfilling a scrutiny and oversight role? If so, would that require any change to membership arrangements?

Yes

Comments:

Do not change for the sake of change a system that works Chief Fire Officer after consultation with the public , unions and Fire Authority results into a mutually agreed precept application to the constituent la's

Q12. 12. Do you have any other proposals for how to reform FRA governance which meet the criteria in Chapters 1 and 2?

No Response

Q13. 13. Do you agree that FRAs and local authorities should agree the level of FRA funding each year, with a reserve arbitration power for the Welsh Ministers?

Yes

Comments:

The system works without WG trying to control .WG should look into getting its own house in order especially the services it provides

Q14. 14. Do you agree that, in the longer term, FRAs should have powers to set a council tax precept, with the balance of their funding from Welsh Government grants?

Yes

Q15. 15. Do you have any other proposals for how to reform FRA funding which meet the criteria in Chapters 1 and 2?

No

Q16. 16. Do you agree that the performance management system for FRAs should be grounded in the National Framework for Fire and Rescue Services?

Yes

Q17. 17. Do you agree with the need for such a system to give FRAs flexibility on planning and reporting cycles, and on the sources of information about performance that they use?

Yes

Q18. 18. Do you agree that the Welsh Ministers should retain their duty to report to the Assembly about delivery of the Framework, and their powers of intervention?

Yes

Comments:

Intervention only if local democracy and scrutiny fails . Don't change for the sake of change

Q19. 19. We would like to know your views on the effects that the policy proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

It's important that Welsh Language continues to have equal status

Q20. 20. Please also explain how you believe the policy proposals could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No Response

Q21. 21. We have asked a number of specific questions about FRA governance, finance and performance management. If you have any related issues which we have not specifically addressed, please use this space to report them.

No Response

Q22. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name Edward Thomas
Organisation (if applicable) County Councillor

Q23. If you want to receive a receipt of your response, please provide an email address. Email address

[REDACTED]

Q24. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response

Response 10

Reform of fire and rescue authorities in Wales

Submit your response

Q1. 1. Do you agree the objectives for reform are appropriate and important?

Yes

Comments:

Make Senior Managers and Fire Authority more accountable and make everything transparent

Q2. 2. Are there other objectives that the reform programme should pursue?

Ye

Comments:

look at covering the same boundaries as police services in Wales, streamline back office functions across all welsh FRS

Q3. 3. Do you agree that Fire and Rescue Authorities (FRAs) should remain as separate and distinct entities, with the same boundaries as now?

No

Comments:

need to look at mirroring the police boundaries, and work within complete LA areas. would

Q4. 4. Do you agree that transferring control of fire and rescue services to Police and Crime Commissioners or local authorities would not be appropriate?

Yes

Comments:

Police are devolved, Fire service are not

Q5. 5. Do you agree that there are legitimate but limited national interests in the Service that need to be reflected in its governance arrangements?

Yes

Q6. 6. Do you agree that local authorities should continue to nominate FRA members?

No

Comments:

Some FRA have no knowledge or experience of FRS yet make decisions and "scrutinise" decisions/policy/procedures The function of FRA should also be looked at when they are in place, should they really be involved in what they are currently involved in???? some fall asleep in meetings and interviews!!!!!!!

Q7. 7. Do you agree that local authorities should nominate one FRA member each, drawn from their cabinets?

Yes

Comments:

reduce numbers, reduce costs!

Q8. 8. Do you believe any changes are needed to the law on the size and remuneration of council cabinets, to allow their members also to serve on FRAs?

Yes

Comments:

FRA needs to be made up of members who have knowledge and expertise but are also dynamic and will hold senior FRS managers to account.

Q9. 9. Do you agree that FRAs should also have non-executive members?

Yes

Comments:

this would allow more transparency and hold all members to account, would give a different perspective from outside of public sector possibly

Q10. 10. Who should appoint non-executive members of FRAs?

welsh government to avoid local senior managers "picking" who they want/feel will agree and not challenge

Q11. 11. Do you agree that, in the longer term, responsibility for the service should vest in a statutory Chief Fire Officer, with FRAs fulfilling a scrutiny and oversight role? If so, would that require any change to membership arrangements?

Yes

Q12. 12. Do you have any other proposals for how to reform FRA governance which meet the criteria in Chapters 1 and 2?

No Response

Q13. 13. Do you agree that FRAs and local authorities should agree the level of FRA funding each year, with a reserve arbitration power for the Welsh Ministers?

No

Comments:

adds a layer of bureaucracy, budgets and funding should be the responsibility of each FRS CFO

Q14. 14. Do you agree that, in the longer term, FRAs should have powers to set a council tax precept, with the balance of their funding from Welsh Government grants?

Yes

Q15. 15. Do you have any other proposals for how to reform FRA funding which meet the criteria in Chapters 1 and 2?

No

Q16. 16. Do you agree that the performance management system for FRAs should be grounded in the National Framework for Fire and Rescue Services?

Yes

Q17. 17. Do you agree with the need for such a system to give FRAs flexibility on planning and reporting cycles, and on the sources of information about performance that they use?

Yes

Q18. 18. Do you agree that the Welsh Ministers should retain their duty to report to the Assembly about delivery of the Framework, and their powers of intervention?

Yes

Q19. 19. We would like to know your views on the effects that the policy proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No Response

Q20. 20. Please also explain how you believe the policy proposals could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No Response

Q21. 21. We have asked a number of specific questions about FRA governance, finance and performance management. If you have any related issues which we have not specifically addressed, please use this space to report them.

No Response

Q22. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name

██████████

Organisation (if applicable) -

Q23. If you want to receive a receipt of your response, please provide an email address. Email address

No Response

Q24. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

Keep my response anonymous

Response 11

Reform of fire and rescue authorities in Wales

Submit your response

Q1. 1. Do you agree the objectives for reform are appropriate and important?

Yes

Q2. 2. Are there other objectives that the reform programme should pursue?

No

Q3. 3. Do you agree that Fire and Rescue Authorities (FRAs) should remain as separate and distinct entities, with the same boundaries as now?

Yes

Q4. 4. Do you agree that transferring control of fire and rescue services to Police and Crime Commissioners or local authorities would not be appropriate?

Yes

Q5. 5. Do you agree that there are legitimate but limited national interests in the Service that need to be reflected in its governance arrangements?

Yes

Q6. 6. Do you agree that local authorities should continue to nominate FRA members?

Yes

Comments:

AS LAID OUT IN THE PROPOSAL, WITH MORE ROTATION. FRA MEMBERS SHOULD NOT SIT CONTINUOUSLY AND NURTURE A BIAS TOWARDS FRS OFFICIALS

Q7. 7. Do you agree that local authorities should nominate one FRA member each, drawn from their cabinets?

Yes

Q8. 8. Do you believe any changes are needed to the law on the size and remuneration of council cabinets, to allow their members also to serve on FRAs?

No

Q9. 9. Do you agree that FRAs should also have non-executive members?

Yes

Q10. 10. Who should appoint non-executive members of FRAs?

WAG FIRST MINISTER

Q11. 11. Do you agree that, in the longer term, responsibility for the service should vest in a statutory Chief Fire Officer, with FRAs fulfilling a scrutiny and oversight role? If so, would that require any change to membership arrangements?

Yes

Q12. 12. Do you have any other proposals for how to reform FRA governance which meet the criteria in Chapters 1 and 2?

No Response

Q13. 13. Do you agree that FRAs and local authorities should agree the level of FRA funding each year, with a reserve arbitration power for the Welsh Ministers?

Yes

Q14. 14. Do you agree that, in the longer term, FRAs should have powers to set a council tax precept, with the balance of their funding from Welsh Government grants?

Yes

Q15. 15. Do you have any other proposals for how to reform FRA funding which meet the criteria in Chapters 1 and 2?

No

Q15. 15. Do you have any other proposals for how to reform FRA funding which meet the criteria in Chapters 1 and 2?

Comments:

FRA FUNDING SHOULD NOT BE AT THE EXPENSE OF OTHER LOCAL AUTHORITY BUDGET REQUIREMENTS SUCH AS SCHOOLS, SOCIAL SERVICES ETC

Q16. 16. Do you agree that the performance management system for FRAs should be grounded in the National Framework for Fire and Rescue Services?

Yes

Comments:

ABSOLUTELY, ALL FRA'S NEED TO BE SCUTINISED ON A REGULAR BASIS

Q17. 17. Do you agree with the need for such a system to give FRAs flexibility on planning and reporting cycles, and on the sources of information about performance that they use?

No

Q18. 18. Do you agree that the Welsh Ministers should retain their duty to report to the Assembly about delivery of the Framework, and their powers of intervention?

Yes

Q19. 19. We would like to know your views on the effects that the policy proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

THERE SHOULD BE NO EFFECT ON THE WELSH LANGUAGE, FRA MEMBERS SHOULD BE A MIX OF ENGLISH AND WELSH AS THEY ARE NOW

Q20. 20. Please also explain how you believe the policy proposals could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No Response

Q21. 21. We have asked a number of specific questions about FRA governance, finance and performance management. If you have any related issues which we have not specifically addressed, please use this space to report them.

HISTORICALLY THE RELATIONSHIP BETWEEN FRA MEMBERS AND CFO'S HAVE BEEN FAR TOO CLOSE. I FEEL THAT FRA MEMBERS DO NOT FULLY UNDERSTAND OR ARE NOT CHALLENGING STRATEGIC DECISIONS ENOUGH.

Q22. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name

[REDACTED]

Organisation (if applicable) -

Q23. If you want to receive a receipt of your response, please provide an email address. Email address

No Response

Q24. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

Keep my response anonymous

Response 12

Consultation Response Form

Your name: Caerphilly County Borough Council Labour Group

Organisation (if applicable):

email / telephone number:

[REDACTED]

Your address: Ty Penallta, Tredomen Park, Ystrad Mynach

Question 1: Do you agree the objectives for reform are appropriate and important?

We agree that some aspects of the governance and accountability of Fire and Rescue Services in Wales require a degree of reform in respect of financial accountability and the modernisation of performance and accountability requirements. However, we do not agree that the structure of Fire and Rescue Authorities, in terms of their political membership and leadership, should be altered for the reasons set out later in this response.

There are issues facing the service that could have been examined more fully, particularly the inability of fire and rescue services in Wales to secure greater diversification related to current discussions at the National Joint Council. The increasing role in supporting the nation's counter-terrorism response could also have been expressly considered.

Question 2: Are there other objectives that the reform programme should pursue?

We are fully supportive of the changing role of the South Wales Fire and Rescue Service and its preventative agenda. The reduction in fires is a direct consequence of the dedication and expertise of fire service staff in advising business and communities on fire prevention. Likewise we consider the evolving role of fire officers in securing the health and wellbeing of communities by supporting other statutory public services, to be a natural extension of this remit. In particular, the role to support other emergency services by acting as first responders and the invaluable role that fire officers are able to perform in the community by supporting our most vulnerable residents to remain safe and well in their homes. These new and evolving roles have been proven through research to have significant cost benefits. This changing role should be supported and nurtured since it is only through working as one public service that we can hope to achieve the best outcomes for our communities in the wider context of increasingly challenging financial times.

Now is the time to change the support mechanisms needed to enable our fire services to continue to develop this important aspect of their evolving role.

We would like to see more openness and transparency between the Fire and Rescue Authority and the Local Authority. For example, the link between local delivery and democratic accountability could be strengthened. Fire Authority members are nominated by the Council however the service does not currently report back in any formal way. We would like to see fire service reporting progress against their strategic objectives, finance and performance as an item that is examined by Council and/or Scrutiny on a periodic basis.

Question 3: Do you agree that FRAs should remain as separate and distinct entities, with the same boundaries as now?

Yes we agree that it would be a backward step to align fire services to local authorities. The increasingly technical aspects of the service require critical mass to allow the necessary expertise to safeguard our communities. Technological advances can be best employed by larger organisations. Fragmenting or disaggregating the service would risk losing the advantages gained since 1996. A single service in Wales would be too detached from local communities and local democracy.

We agree that the boundaries should remain as they are although we do consider that it can be difficult for fire services to operate over several health board and police force boundaries. For example, servicing 9 Public Services Boards in the South Wales Fire and Rescue Service area must be a challenge. Despite this we have always found engagement at a strategic and operational officer level to be extremely good.

We would caution against any reorganisation on a different footprint without a very clear line of sight between costs vs benefits. The 'footprint' in the Gwent region covers five local authorities and we do not believe that this would offer the scale and resilience needed for a modern fire and rescue service. The current coverage over ten local authorities seems both appropriate and sustainable.

Question 4: Do you agree that transferring control of fire and rescue services to Police and Crime Commissioners or local authorities would not be appropriate?

We agree with this statement and believed that this line of accountability had already been discounted. Police and Crime Commissioners are non-devolved, therefore it would introduce another level of structure in Wales to transfer control in this direction. Police and Crime Commissioners have a difficult job in undertaking the commissioning of effective policing services when crime patterns are changing and finances are increasingly challenging. Police and Crime Commissioners should not be distracted from their remit. Likewise Fire and Rescue Services should be left to determine their own strategic direction. While they are both emergency services, that already work very closely together, we cannot see any benefit in introducing one governance structure.

Please see our response above in respect of local authority control. Disaggregating the service to local authority level would fragment the capacity in staffing, technical capability and risk modelling expertise.

Question 5: Do you agree that there are legitimate but limited national interests in the Service that need to be reflected in its governance arrangements?

Yes we agree that there are limited national interests that could be reflected in reform. The status of the National Framework could be strengthened but we are not aware that any services in Wales are currently failing to follow it.

We believe the Fire and Rescue Services should be able to determine their own strategic direction based upon the risk factors in their communities in terms of demographics, geography and the types of building/facilities/installations that are within their area. They should be able to determine their own plans and budgets, subject to the considerations we explain in further detail below, and they should be able to set their performance and outcome measures in collaboration with the other services in Wales. We believe that the current support and intervention protocol allows Welsh Government the assurance it needs and that our services are operating effectively. Wales does not have the HMICFRS as in England, but the combination of the independent Chief Fire and Rescue Advisor, WAO oversight, the National Framework, self-assessment and Improvement/Well-being Objective setting should be sufficient to ensure the best service possible.

Question 6: Do you agree that local authorities should continue to nominate FRA members?

Yes, we strongly agree with this proposal. Further we do not think that the current system requires reform. This authority nominates three members, with political balance, all of whom have developed knowledge and expertise in their role. As one of the larger local authorities covered by the South Wales Fire and Rescue Service we believe that reducing this number would prejudice our local residents who would be affected inequitably should the option of one member per local authority area be pursued. We entirely disagree with the assertion in the White Paper that 'backbenchers' do not have the required expertise and capacity to carry out their role effectively. Members sit on several Fire Authority committees and have provided a dedicated scrutiny role in carrying out this function on behalf of the local authority. Local authority elected members come from a wide range of backgrounds with a wide range of skills. Members are selected based upon what they may bring to the Fire Authority and how they could enhance the process. We do not subscribe to the view that being a 'backbencher' indicates that someone is less valuable than a Cabinet Member. Indeed skills may be present in elected members that are not required for a Cabinet role but are valuable to Fire Authorities.

We believe that the local authority should continue to nominate three members as it does now. We believe that the level of commitment required to support the business of the Fire and Rescue Authority requires this number of elected members as we fail to see how a single member would have the capacity to undertake the role. Many of our members are also employed and because of this they would not have the ability to take on the role single handed. The benefit of drawing on their expertise in other roles, which may be directly related to their employment, is of benefit to both the local authority and the fire authority. This proposal devalues the essential role that our elected members play in ensuring the democratic accountability of the communities they serve and negates the fact that they are representing the whole authority when they sit on the Fire Authority and not their own constituencies. Views on issues that affect locality service such as station closure are gathered, or should be gathered, through effective public consultation. Our Elected Members do not sit on the Fire and Rescue Authority to represent their own communities. We are very clear that we do not want the current arrangement, i.e. the nomination of the three Elected Members to alter. If concerns exist over the level of consistency provided through the role of Elected Members we suggest that a development programme is introduced across Wales via the Welsh Government. However we would like to point out that Elected Members already receive extensive training on effective scrutiny. We fail to see why Fire Authority members should be required to prove a level of qualification, or experience, that is not a requirement of any other democratically elected role. It is our assumption that Welsh Government places a similar value on its Assembly Members, whether they sit in Cabinet or not.

Question 7: Do you agree that local authorities should nominate one FRA member each, drawn from their cabinets?

We do not think that it requires a Cabinet Member to conduct this role. Cabinet Members have significant portfolios within the Local Authority. Asking a Cabinet Member to also effectively discharge the local authority responsibility to the Fire Authority alongside their responsibility to local authority services is too big an 'ask' for both organisations. Given the importance of the fire authority role a Cabinet Member is likely to be highly distracted from local authority business and hence this brings into question what possible value could elevating the role to a Cabinet Member have other than to answer the White Paper's assertion that backbenchers are incapable? This is an invalid argument in the view of this local authority and we believe Elected Members who do not sit in Cabinet can be equally as capable with skills in different areas.

It is possible that level of seniority could be increased, if this is the concern, by requiring that the Chair of an appropriate Scrutiny Committee is one of the nominated members. However, we maintain our view that the best person for the job should be the overriding decisive factor.

We believe that Welsh Government should also have some regard to political bias. A single member from each local authority in the South Wales Fire and Rescue Service area would result in a Fire Authority heavily dominated by one political party. A balance of political views is required to effect proper scrutiny. We maintain that the number of Fire Authority members should reflect the populations of the authorities the service covers. An unfair and inequitable structure, as proposed, would result in unequal and unproportioned voting ability.

Question 8: Do you believe any changes are needed to the law on the size and remuneration of council cabinets, to allow their members also to serve on FRAs?

No, we don't not believe that the size of local authority Cabinets should increase to fulfil this role. Neither do we believe that remuneration of Cabinet Members should be increased. There is a cost to our local taxpayers in increasing the size of the Cabinet. This authority has already taken the decision to reduce the size of its Cabinet through the current administration to reduce the financial costs of democracy to local council tax payers. We believe that we have the correct balance for the senior executive and the role they undertake for the local authority. Increasing the number of Cabinet Members would increase the overall costs of Cabinet. Remuneration through special responsibility allowance is more appropriate for Elected Members who take on this role alongside their constituency and local authority scrutiny functions. This system is far more cost effective.

Question 9: Do you agree that FRAs should also have non-executive members?

No, we do not agree. If funding continues to be generated through local authorities, as we explain below, then it is not appropriate that Welsh Government have a role in selecting non-executive members. The link back to local democracy must be maintained.

We are not sure what capacity a non-executive member could add. Given the proposed 25% this would equate to 2.5 members if the one Elected Member per local authority option were progressed. The role of the Fire and Rescue Authority is to hold the Fire and Rescue Service to account not manage or run the service. The necessary expertise be that financial, legal or technical should come from the officers of the service itself not the Fire Authority Members. Fire and Rescue Authorities are able to co-opt in expertise if they feel this is necessary.

Appointing non-executive persons to Fire and Rescue Authorities would increase the cost of scrutiny further.

Question 10: Who should appoint non-executive members of FRAs?

Please see above. This is not an appropriate role for Welsh Government who are removed from the direct relationship with local communities. We do not believe that individuals nominated by Welsh Government will have the expertise required to operate public services.

Question 11: Do you agree that, in the longer term, responsibility for the service should vest in a statutory Chief Fire Officer, with FRAs fulfilling a scrutiny and oversight role? If so, would that require any change to membership arrangements?

We believe that the Fire and Rescue Authority should hold the responsibility for delivering the service in a similar way that the local authority is responsible for delivering services. And that the responsibility of the Fire Authority Members should be to hold the service to account. This should not entail any changes to membership arrangements as we still believe that nominated Elected Members are in the best position to scrutinise the planning and performance of the service.

Vesting statutory responsibilities in a Chief Fire Officer risks separating the responsibility for delivering the service from accountability e.g. that person would be expected to deliver, but budgets would be set by the Fire and Rescue Authority. We cannot think of any arrangement of this type in the public sector.

Question 12: Do you have any other proposals for how to reform FRA governance which meet the criteria in Chapters 1 and 2?

No.

Question 13: Do you agree that FRAs and local authorities should agree the level of FRA funding each year, with a reserve arbitration power for the Welsh Ministers?

No, we believe this would not be a sensible step forward. As explained above we would like to see the planning and performance of the Fire Service more readily discussed and available at local authority Council and Scrutiny. Should the option for funding by precept not progress we would also like an enhanced ability to agree the levy through assurance that the service is delivering on behalf of our residents, businesses and communities. The democratic link could be strengthened.

Question 14: Do you agree that, in the longer term, FRAs should have powers to set a council tax precept, with the balance of their funding from Welsh Government grants?

We would have some significant concerns if the service were to become wholly or partly reliable on funding direct from Welsh Government. The thrust of the White Paper seems to devalue the service and suggest that it is long overdue for modernisation. We do not subscribe to this view and regard the service as a high performing risk based organisation that has secured impressive safety levels in our communities against increasing threats. Local accountability is better served by a model that continues to involve local communities in assurance that a good level of service is provided for local tax payers.

A precept would seem a sensible move forward. This would ensure that there was direct communication with our local residents who would receive information annually on how the service was performing against the investment in it, in exactly the same way that the policing precept is administered by the local authority now.

Question 15: Do you have any other proposals for how to reform FRA funding which meet the criteria in Chapters 1 and 2?

The changing role of the service should be considered in respect of the funding mechanisms. If the role of fire officers is to continue to evolve, particularly through providing support to overstretched health services, then there must be a mechanism to fund this enhanced role. The Scottish Fire Service has been able to add capacity to community health provision by increasing the salaries paid to fire officers. This is not possible in Wales due to the limits on increases. This is hampering the ability for Fire and Rescue Services to develop this capacity. It is our opinion that Welsh Government should look more closely at this blockage if it wishes to assist services in minimising the burden on the Welsh NHS and Ambulance Trust, possibly through reallocating health funding directly to Fire and Rescue Services.

Question 16: Do you agree that the performance management system for FRAs should be grounded in the National Framework for Fire and Rescue Services?

Yes, we agree that the Local Government Measure is not an appropriate way to measure the performance of Fire and Rescue Services. It is our view that the National Framework, the statutory responsibilities placed on fire and rescue services, combined with the requirement to develop Well-being Objectives, which take account of their local situations, is a better option. We do believe that a data set that allows benchmarking with the other services in Wales and similar services in England should be maintained. However, it is impossible to measure prevention in numbers, other outcome measures must be developed to monitor this important evolution of the service.

Welsh Ministers should continue to report on the National Framework on a two yearly cycle.

Question 17: Do you agree with the need for such a system to give FRAs flexibility on planning and reporting cycles, and on the sources of information about performance that they use?

Yes, we agree with this. It is important to record outcomes for local communities and not what can be measured. Fire Services themselves are best placed to determine their measures and reporting, including frequency of reporting, in collaboration with each other and through the National Framework, subject to the scrutiny of the Fire and Rescue Authority.

Question 18: Do you agree that the Welsh Ministers should retain their duty to report to the Assembly about delivery of the Framework, and their powers of intervention?

Yes, we believe that this will still be required.

Question 19: We would like to know your views on the effects that the policy proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No comment.

Question 20: Please also explain how you believe the policy proposals could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the

Welsh language and on treating the Welsh language no less favourably than the English language.

No comment.

Question 21: We have asked a number of specific questions about FRA governance, finance and performance management. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

☐

Response 13

Consultation Response Form

Your name: Caerphilly County Borough Council

Organisation (if applicable):

email / telephone number:

Your address: Ty Penallta, Tredomen Park, Ystrad Mynach

Question 1: Do you agree the objectives for reform are appropriate and important?

We agree that some aspects of the governance and accountability of Fire and Rescue Services in Wales require a degree of reform in respect of financial accountability and the modernisation of performance and accountability requirements. However, we do not agree that the structure of Fire and Rescue Authorities, in terms of their political membership and leadership, should be altered for the reasons set out later in this response.

There are issues facing the service that could have been examined more fully, particularly the inability of fire and rescue services in Wales to secure greater diversification related to current discussions at the National Joint Council. The increasing role in supporting the nation's counter-terrorism response could also have been expressly considered.

Question 2: Are there other objectives that the reform programme should pursue?

We are fully supportive of the changing role of the South Wales Fire and Rescue Service and its preventative agenda. The reduction in fires is a direct consequence of the dedication and expertise of fire service staff in advising business and communities on fire prevention.

Likewise we consider the evolving role of fire officers in securing the health and wellbeing of communities by supporting other statutory public services, to be a natural extension of this remit. In particular, the role to support other emergency services by acting as first responders and the invaluable role that fire officers are able to perform in the community by supporting our most vulnerable residents to remain safe and well in their homes. These new and evolving roles have been proven through research to have significant cost benefits. This changing role should be supported and nurtured since it is only through working as one public service that we can hope to achieve the best outcomes for our communities in the wider context of increasingly challenging financial times.

Now is the time to change the support mechanisms needed to enable our fire services to continue to develop this important aspect of their evolving role.

We would like to see more openness and transparency between the Fire and Rescue Authority and the Local Authority. For example, the link between local delivery and democratic accountability could be strengthened. Fire Authority members are nominated by the Council however the service does not currently report back in any formal way. We would like to see fire service reporting progress against their strategic objectives, finance and performance as an item that is examined by Council and/or Scrutiny on a periodic basis.

Question 3: Do you agree that FRAs should remain as separate and distinct entities, with the same boundaries as now?

Yes we agree that it would be a backward step to align fire services to local authorities. The increasingly technical aspects of the service require critical mass to allow the necessary expertise to safeguard our communities. Technological advances can be best employed by larger organisations. Fragmenting or disaggregating the service would risk losing the advantages gained since 1996. A single service in Wales would be too detached from local communities and local democracy.

We agree that the boundaries should remain as they are although we do consider that it can be difficult for fire services to operate over several health board and police force boundaries. For example, servicing 9 Public Services Boards in the South Wales Fire and Rescue Service area must be a challenge. Despite this we have always found engagement at a strategic and operational officer level to be extremely good.

We would caution against any reorganisation on a different footprint without a very clear line of sight between costs vs benefits. The 'footprint' in the Gwent region covers five local authorities and we do not believe that this would offer the scale and resilience needed for a modern fire and rescue service. The current coverage over ten local authorities seems both appropriate and sustainable.

Question 4: Do you agree that transferring control of fire and rescue services to Police and Crime Commissioners or local authorities would not be appropriate?

We agree with this statement and believed that this line of accountability had already been discounted. Police and Crime Commissioners are non-devolved, therefore it would introduce another level of structure in Wales to transfer control in this direction. Police and Crime Commissioners have a difficult job in undertaking the commissioning of effective policing services when crime patterns are changing and finances are increasingly challenging. Police and Crime Commissioners should not be distracted from their remit. Likewise Fire and Rescue Services should be left to determine their own strategic direction. While they are both emergency services, that already work very closely together, we cannot see any benefit in introducing one governance structure.

Please see our response above in respect of local authority control. Disaggregating the service to local authority level would fragment the capacity in staffing, technical capability and risk modelling expertise.

Question 5: Do you agree that there are legitimate but limited national interests in the Service that need to be reflected in its governance arrangements?

Yes we agree that there are limited national interests that could be reflected in reform. The status of the National Framework could be strengthened but we are not aware that any services in Wales are currently failing to follow it.

We believe the Fire and Rescue Services should be able to determine their own strategic direction based upon the risk factors in their communities in terms of demographics, geography and the types of building/facilities/installations that are within their area. They should be able to determine their own plans and budgets, subject to the considerations we explain in further detail below, and they should be able to set their performance and outcome measures in collaboration with the other services in Wales. We believe that the current support and intervention protocol allows Welsh Government the assurance it needs and that our services are operating effectively. Wales does not have the HMICFRS as in England, but the combination of the independent Chief Fire and Rescue Advisor, WAO oversight, the National Framework, self-assessment and Improvement/Well-being Objective setting should be sufficient to ensure the best service possible.

Question 6: Do you agree that local authorities should continue to nominate FRA members?

Yes, we strongly agree with this proposal. Further we do not think that the current system requires reform. This authority nominates three members, with political balance, all of whom have developed knowledge and expertise in their role. As one of the larger local authorities covered by the South Wales Fire and Rescue Service we believe that reducing this number would prejudice our local residents who would be affected inequitably should the option of one member per local authority area be pursued. We entirely disagree with the assertion in the White Paper that 'backbenchers' do not have the required expertise and capacity to carry out their role effectively. Members sit on several Fire Authority committees and have provided a dedicated scrutiny role in carrying out this function on behalf of the local authority. Local authority elected members come from a wide range of backgrounds with a wide range of skills. Members are selected based upon what they may bring to the Fire Authority and how they could enhance the process. We do not subscribe to the view that being a 'backbencher' indicates that someone is less valuable than a Cabinet Member. Indeed skills may be present in elected members that are not required for a Cabinet role but are valuable to Fire Authorities.

We believe that the local authority should continue to nominate three members as it does now. We believe that the level of commitment required to support the business of the Fire and Rescue Authority requires this number of elected members as we fail to see how a single member would have the capacity to undertake the role. Many of our members are also employed and because of this they would not have the ability to take on the role single handed. The benefit of drawing on their expertise in other roles, which may be directly related to their employment, is of benefit to both the local authority and the fire authority. This proposal devalues the essential role that our elected members play in ensuring the democratic accountability of the communities they serve and negates the fact that they are representing the whole authority when they sit on the Fire Authority and not their own constituencies. Views on issues that affect locality service such as station closure are gathered, or should be gathered, through effective public consultation. Our Elected Members

do not sit on the Fire and Rescue Authority to represent their own communities. We are very clear that we do not want the current arrangement, i.e. the nomination of the three Elected Members to alter. If concerns exist over the level of consistency provided through the role of Elected Members we suggest that a development programme is introduced across Wales via the Welsh Government. However we would like to point out that Elected Members already receive extensive training on effective scrutiny. We fail to see why Fire Authority members should be required to prove a level of qualification, or experience, that is not a requirement of any other democratically elected role. It is our assumption that Welsh Government places a similar value on its Assembly Members, whether they sit in Cabinet or not.

Question 7: Do you agree that local authorities should nominate one FRA member each, drawn from their cabinets?

We do not think that it requires a Cabinet Member to conduct this role. Cabinet Members have significant portfolios within the Local Authority. Asking a Cabinet Member to also effectively discharge the local authority responsibility to the Fire Authority alongside their responsibility to local authority services is too big an 'ask' for both organisations. Given the importance of the fire authority role a Cabinet Member is likely to be highly distracted from local authority business and hence this brings into question what possible value could elevating the role to a Cabinet Member have other than to answer the White Paper's assertion that backbenchers are incapable? This is an invalid argument in the view of this local authority and we believe Elected Members who do not sit in Cabinet can be equally as capable with skills in different areas.

It is possible that level of seniority could be increased, if this is the concern, by requiring that the Chair of an appropriate Scrutiny Committee is one of the nominated members. However, we maintain our view that the best person for the job should be the overriding decisive factor.

We believe that Welsh Government should also have some regard to political bias. A single member from each local authority in the South Wales Fire and Rescue Service area would result in a Fire Authority heavily dominated by one political party. A balance of political views is required to effect proper scrutiny. We maintain that the number of Fire Authority members should reflect the populations of the authorities the service covers. An unfair and inequitable structure, as proposed, would result in unequal and unproportioned voting ability.

Question 8: Do you believe any changes are needed to the law on the size and remuneration of council cabinets, to allow their members also to serve on FRAs?

No, we don't not believe that the size of local authority Cabinets should increase to fulfil this role. Neither do we believe that remuneration of Cabinet Members should be increased. There is a cost to our local taxpayers in increasing the size of the Cabinet. This authority has already taken the decision to reduce the size of its Cabinet through the current administration to reduce the financial costs of democracy to local council tax payers. We believe that we have the correct balance for the senior executive and the role they undertake for the local authority. Increasing the number of Cabinet Members would increase the overall costs of Cabinet. Remuneration through special responsibility allowance is more appropriate for Elected Members who take on this role alongside their constituency and local authority scrutiny functions. This system is far more cost effective.

Question 9: Do you agree that FRAs should also have non-executive members?

No, we do not agree. If funding continues to be generated through local authorities, as we explain below, then it is not appropriate that Welsh Government have a role in selecting non-executive members. The link back to local democracy must be maintained.

We are not sure what capacity a non-executive member could add. Given the proposed 25% this would equate to 2.5 members if the one Elected Member per local authority option were progressed. The role of the Fire and Rescue Authority is to hold the Fire and Rescue Service to account not manage or run the service. The necessary expertise be that financial, legal or technical should come from the officers of the service itself not the Fire Authority Members. Fire and Rescue Authorities are able to co-opt in expertise if they feel this is necessary.

Appointing non-executive persons to Fire and Rescue Authorities would increase the cost of scrutiny further.

Question 10: Who should appoint non-executive members of FRAs?

Please see above. This is not an appropriate role for Welsh Government who are removed from the direct relationship with local communities. We do not believe that individuals nominated by Welsh Government will have the expertise required to operate public services.

Question 11: Do you agree that, in the longer term, responsibility for the service should vest in a statutory Chief Fire Officer, with FRAs fulfilling a scrutiny and oversight role? If so, would that require any change to membership arrangements?

We believe that the Fire and Rescue Authority should hold the responsibility for delivering the service in a similar way that the local authority is responsible for delivering services. And that the responsibility of the Fire Authority Members should be to hold the service to account. This should not entail any changes to membership arrangements as we still believe that nominated Elected Members are in the best position to scrutinise the planning and performance of the service.

Vesting statutory responsibilities in a Chief Fire Officer risks separating the responsibility for delivering the service from accountability e.g. that person would be expected to deliver, but budgets would be set by the Fire and Rescue Authority. We cannot think of any arrangement of this type in the public sector.

Question 12: Do you have any other proposals for how to reform FRA governance which meet the criteria in Chapters 1 and 2?

No.

Question 13: Do you agree that FRAs and local authorities should agree the level of FRA funding each year, with a reserve arbitration power for the Welsh Ministers?

This has always been the case through budget consultation processes with no need for intervention from Welsh Ministers. A reserved arbitration power for Ministers has not been required and it is not appropriate that one is created. Welsh Ministers cannot be accountable for the delivery of a public service.

Question 14: Do you agree that, in the longer term, FRAs should have powers to set a council tax precept, with the balance of their funding from Welsh Government grants?

We would have some significant concerns if the service were to become wholly or partly reliable on funding direct from Welsh Government. The thrust of the White Paper seems to devalue the service and suggest that it is long overdue for modernisation. We do not subscribe to this view and regard the service as a high performing risk based organisation

that has secured impressive safety levels in our communities against increasing threats. Local accountability is better served by a model that continues to involve local communities in assurance that a good level of service is provided for local tax payers.

A precept would seem a sensible move forward. This would ensure that there was direct communication with our local residents who would receive information annually on how the service was performing against the investment in it, in exactly the same way that the policing precept is administered by the local authority now.

Question 15: Do you have any other proposals for how to reform FRA funding which meet the criteria in Chapters 1 and 2?

The changing role of the service should be considered in respect of the funding mechanisms. If the role of fire officers is to continue to evolve, particularly through providing support to overstretched health services, then there must be a mechanism to fund this enhanced role. The Scottish Fire Service has been able to add capacity to community health provision by increasing the salaries paid to fire officers. This is not possible in Wales due to the limits on increases. This is hampering the ability for Fire and Rescue Services to develop this capacity. It is our opinion that Welsh Government should look more closely at this blockage if it wishes to assist services in minimising the burden on the Welsh NHS and Ambulance Trust, possibly through reallocating health funding directly to Fire and Rescue Services.

Question 16: Do you agree that the performance management system for FRAs should be grounded in the National Framework for Fire and Rescue Services?

Yes, we agree that the Local Government Measure is not an appropriate way to measure the performance of Fire and Rescue Services. It is our view that the National Framework, the statutory responsibilities placed on fire and rescue services, combined with the requirement to develop Well-being Objectives, which take account of their local situations, is a better option. We do believe that a data set that allows benchmarking with the other services in Wales and similar services in England should be maintained. However, it is impossible to measure prevention in numbers, other outcome measures must be developed to monitor this important evolution of the service.

Welsh Ministers should continue to report on the National Framework on a two yearly cycle.

Question 17: Do you agree with the need for such a system to give FRAs flexibility on planning and reporting cycles, and on the sources of information about performance that they use?

Yes, we agree with this. It is important to record outcomes for local communities and not what can be measured. Fire Services themselves are best placed to determine their measures and reporting, including frequency of reporting, in collaboration with each other and through the National Framework, subject to the scrutiny of the Fire and Rescue Authority.

Question 18: Do you agree that the Welsh Ministers should retain their duty to report to the Assembly about delivery of the Framework, and their powers of intervention?

Yes, we believe that this will still be required.

Question 19: We would like to know your views on the effects that the policy proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No comment.

Question 20: Please also explain how you believe the policy proposals could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No comment.

Question 21: We have asked a number of specific questions about FRA governance, finance and performance management. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

☐

Response 14

Owen Smith MP



HOUSE OF COMMONS

LONDON SW1A 0AA

fire@gov.wales

Fire Services Branch
Welsh Government
Rhydycar
Merthyr Tydfil
CF48 1UZ

24 January 2018

Re: Reform of Fire and Rescue Authorities in Wales

Please find attached my completed response form for the Welsh Government consultation on reform of the Fire and Rescue Authorities in Wales' governance and funding arrangements.

In short, I agree with some of the proposals on performance management but strongly disagree with some of the proposals for the funding and membership of Fire and Rescue Authorities in Wales.

Yours sincerely,

A handwritten signature in black ink that reads "Owen Smith".

Owen Smith
Member of Parliament for Pontypridd

10 Market Street, Pontypridd, CF37 2ST
owen.smith.mp@parliament.uk
www.owensmithmp.co.uk
Twitter @OwenSmith_MP
Tel: 01443 401122

Consultation Response Form

Your name: Owen Smith MP

Organisation (if applicable): Member of Parliament for Pontypridd

email / telephone number: [REDACTED]

Your address: Office of Owen Smith MP, Market Street, Pontypridd, CF37 2ST

Question 1: Do you agree the objectives for reform are appropriate and important?

Yes. Although our Welsh Fire Authorities are performing well and responding positively to their changing challenges and responsibilities, their governance and funding lack transparency and full accountability.

However, any changes should neither reduce their connection and accountability to local authorities, nor increase their cost to tax payers

Question 2: Are there other objectives that the reform programme should pursue?

Question 3: Do you agree that FRAs should remain as separate and distinct entities, with the same boundaries as now?

Yes, although if this is the preferred option for the Welsh Government, and there is no desire to create an all Wales authority, this should be spelled out and definitively stated. The constant speculation about the possibility of such a change is destabilising for the service.

Question 4: Do you agree that transferring control of fire and rescue services to Police and Crime Commissioners or local authorities would not be appropriate?

Yes.

Question 5: Do you agree that there are legitimate but limited national interests in the Service that need to be reflected in its governance arrangements?

Yes.

Question 6: Do you agree that local authorities should continue to nominate FRA members?

Yes, local knowledge, engagement in planning and accountability is vital.

Question 7: Do you agree that local authorities should nominate one FRA member each, drawn from their cabinets?

No. For the following reasons:

a. Cabinet members are drawn from the groups of Councillors making up an Authority and the membership of Cabinets alter over time, with changes in leadership, reshuffles etc. So, to suggest there is necessarily a difference in the calibre and capability or strategic insight of cabinet members versus the wider group of councillors is unproven and, in my experience, untrue.

b. Cabinet members already have a significant weight of responsibilities, with consequent limitations on their availability to perform additional roles. That fact, in addition to the likely perception that FRA duties would be less important than LA responsibilities, may well mean lesser engagement by, and thus accountability to, the LA.

c. Non-Cabinet FRA members tend, in my experience, to take their role extremely seriously. It is often the most significant and time-consuming role they perform, other than their duties as a local member. The relatively low level of churn in these posts also leads, over time, to a significant level of expertise and valuable experience. Attachment of FRA membership to a Cabinet portfolio, with changing holders of that portfolio may actually reduce the value of such positions to both the Council and the FRA.

Question 8: Do you believe any changes are needed to the law on the size and remuneration of council cabinets, to allow their members also to serve on FRAs?

No

Question 9: Do you agree that FRAs should also have non-executive members?

Yes. A small number of Non-Exec positions – either as members of the FRA or making up an additional scrutiny board, might add value. Their cost, however, should be minimal.

Question 10: Who should appoint non-executive members of FRAs?

A joint approach between LAs and the FRA should be taken to such appointments.

Question 11: Do you agree that, in the longer term, responsibility for the service should vest in a statutory Chief Fire Officer, with FRAs fulfilling a scrutiny and oversight role? If so, would that require any change to membership arrangements?

This would be a major change to the governance arrangements for Fire and Rescue Services in Wales and merits far greater explanation and discussion than provided in this document, where it is dropped into one lone paragraph. It may well be an entirely appropriate reform for the longer term, though it is unclear to me how such a reform would be reconcilable with the current proposal's objectives of increasing local accountability and oversight. Charges of being unaccountable were often levelled at Chief Constables under previous governance structures which, as the document suggests, this would most closely resemble.

Question 12: Do you have any other proposals for how to reform FRA governance which meet the criteria in Chapters 1 and 2?

Question 13: Do you agree that FRAs and local authorities should agree the level of FRA funding each year, with a reserve arbitration power for the Welsh Ministers?

Yes. A greater degree of financial accountability to LAs is necessary, and would be beneficial for FRAs, challenging them to justify and argue the case for any increases in funding.

Question 14: Do you agree that, in the longer term, FRAs should have powers to set a council tax precept, with the balance of their funding from Welsh Government grants?

No. This would afford a greater degree of transparency (though the publication of a statement detailing the agreed settlement between LAs and FRA might achieve the same) but no greater local accountability. The level of accountability would be significantly lesser than that which applies in police funding, with the election of Police and Crime Commissioners. In fact, it would provide an impression of public accountability, without truly affording any to local electors.

Question 15: Do you have any other proposals for how to reform FRA funding which meet the criteria in Chapters 1 and 2?

Question 16: Do you agree that the performance management system for FRAs should be grounded in the National Framework for Fire and Rescue Services?

Yes.

Question 17: Do you agree with the need for such a system to give FRAs flexibility on planning and reporting cycles, and on the sources of information about performance that they use?

Yes

Question 18: Do you agree that the Welsh Ministers should retain their duty to report to the Assembly about delivery of the Framework, and their powers of intervention?

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Question 19: We would like to know your views on the effects that the policy proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

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Response 15



1. The Independent Remuneration Panel for Wales (IRPW) appreciates the opportunity to comment on the White Paper. The Panel recognises that the White Paper seeks overall improvement of Fire and Rescue Authority (FRA) governance and to identify methods by which persons with relevant skillsets may become members of FRAs. The Panel notes that such persons will almost certainly need to be drawn from a more varied range of backgrounds if in future an improved, more rigorous, level of challenge, audit and governance of FRAs is to be achieved and maintained. The balance between the proposed non-executive appointed members possibly with specialist expertise, in relation to elected members of local authorities will always need to be carefully considered. In the opinion of the IRPW, both appointed and elected members' service in FRAs should be remunerated. However, the suggestion that the non-executives have only an advisory role would likely require differing levels of remuneration. We question whether this different decision making arrangement would provide better governance than if the appointees had full membership. The essential local representative role of an elected person, highly relevant in the context of a principal council, is not so directly applied to decision making required by FRAs that serve wide regions. If, in this context, significant restructuring of governance of FRAs is implemented the IRPW would need to address entirely freshly any new context for remuneration, in keeping with its remit. Therefore, the following comments from the Panel relate specifically to current structures and particularly to paragraph 3.11 (Page 13) of the White Paper.
2. In their ongoing dialogues with the Panel, FRAs have expressed the view that they particularly value the presence of leading councillors and executive members as council nominated members from their authorities. They indicate that this gives them confidence that issues of importance to FRAs can be placed at the centre of council decision-making and kept high in the awareness of chief officers and members. We are aware that some FRAs have expressed disappointment when more junior members of councils make up their membership. However, the Panel notes that there is currently nothing that prevents leaders, or existing executive members of councils, from serving as members of FRAs in the same way that they have done in the past. That they choose not to do so currently is entirely a matter of their own prioritisation. All councillors, especially senior councillors, continuously

prioritise their time across a wide range of roles of competing significance, many such roles do not convey additional remuneration. The Panel visited all 22 principal councils in 2017 and met many members of the executive. Almost unanimously we were told that their workloads had increased and that it required well in excess of 40 hours a week.

3. The IRPW has determined that elected members of principal authorities may not draw higher level (Band 1 and 2) senior salaries for holding more than one paid role within their authority. For example, leaders and members of the executive are paid on the basis of the role being equivalent to full time and the Panel has for many years determined that such members could not receive additional payment for any role undertaken in any relevant authority within the Panel's remit. Prior to this restriction, there had been instances of significant allegations of disreputable conduct and accusations of 'double remuneration'. Members of the public lose confidence in a system that remunerates persons on the basis they are occupying significant full-time roles but that allows them to occupy other remunerated roles seemingly to be discharged in the same time. Executive members to some extent withdrew from membership of FRAs further to these perceptions and to changes in Panel determinations allowing only one salary to be paid. However, unless current structures are reordered to become significantly different, the IRPW does not feel it would be appropriate to change its determination in order to allow double remuneration of executive councillors solely to encourage them to prioritise involvement with FRAs.
4. Other senior salary holders in a principal council (e.g. chairs of committees) and other councillors can currently be specifically remunerated with a salary to discharge duties related to FRAs. Those currently eligible to receive this additional senior salary for their role as members of a FRA, by definition, have not committed their time fully to a remunerated role. Within current structures these persons should expect to be linked operationally with the relevant officers or members of the council/FRA in an effective manner. Attempts should be made to make existing paid roles effective in their liaison with the relevant executive member(s) rather than to pay an individual, already heavily burdened, executive member twice.
5. If an individual FRA has issues relating crucially to a specific executive or regulatory function of a council, an executive councillor is already being remunerated in their senior role to deal with such matters. Their current fellow councillors additionally remunerated for specific FRA duties, should be working with them, all suitably informed by the FRA and council(s) as required.
6. The current statutory cap on the size of local authority cabinets has been in force since the introduction of the Executive model of governance. It has been maintained because it has been viewed as a beneficial influence on the

ways in which administrations create and distribute remunerated posts. These decisions greatly impact on the culture and political operation of different councils. Improvements to governance of FRAs may be achieved by restructuring or changing of the culture of FRAs. This does not necessarily need to disrupt this statutory limit that has survived because it has essentially served principal authorities effectively.

Independent Remuneration Panel for Wales

John Bader – Chair
Greg Owens – Vice Chair
Stephen Mulholland
Julie May
Saz Willey
Roger Symonds

Response 16

Reform of fire and rescue authorities in Wales

Submit your response

Q1. 1. Do you agree the objectives for reform are appropriate and important?

Yes

Comments:

Agree in principle, however, as the review set out to "Be as limited in scope as possible, and avoid any changes to front-line operations or resources" it has not resulted in significant change.

Q2. 2. Are there other objectives that the reform programme should pursue?

Ye

Comments:

The list of objectives is comprehensive. On balance, a levy system appropriate.

Q3. 3. Do you agree that Fire and Rescue Authorities (FRAs) should remain as separate and distinct entities, with the same boundaries as now?

Yes

Comments:

As the review has not considered radical change, it makes sense for FRAs to continue as they are.

Q4. 4. Do you agree that transferring control of fire and rescue services to Police and Crime Commissioners or local authorities would not be appropriate?

Yes

Comments:

As the review has not considered radical change, it makes sense for FRAs to continue as they are.

Q5. 5. Do you agree that there are legitimate but limited national interests in the Service that need to be reflected in its governance arrangements?

Yes

Comments:

On balance, yes, but the review does not contain sufficient information to come to a considered view on this matter.

Q6. 6. Do you agree that local authorities should continue to nominate FRA members?

Yes

Comments:

If FRAs are funded by a levy, it follows that local authorities should nominate the majority of FRA members.

Q7. 7. Do you agree that local authorities should nominate one FRA member each, drawn from their cabinets?

No

Comments:

We agree with the proposal for each council area served by a FRA to nominate one member each. We do not consider that this person should necessarily be a Cabinet member and the person appointed to the FRA should be determined by each local authority.

Q8. 8. Do you believe any changes are needed to the law on the size and remuneration of council cabinets, to allow their members also to serve on FRAs?

Yes

Comments:

This change may facilitate a local authority to appoint a Cabinet member to this role if it was minded to do so. We do not agree that the local authority FRA member should always be a member of the Cabinet

Q9. 9. Do you agree that FRAs should also have non-executive members?

Yes

Comments:

Potentially yes. If the review has found that lack of expertise is an issue, then this is an appropriate response. However, no evidence is cited in the review

Q10. 10. Who should appoint non-executive members of FRAs?

The actual body who appoints is less important than ensuring this should be done using a fair, open and transparent mechanism.

Q11. 11. Do you agree that, in the longer term, responsibility for the service should vest in a statutory Chief Fire Officer, with FRAs fulfilling a scrutiny and oversight role? If so, would that require any change to membership arrangements?

Yes

Q11. 11. Do you agree that, in the longer term, responsibility for the service should vest in a statutory Chief Fire Officer, with FRAs fulfilling a scrutiny and oversight role? If so, would that require any change to membership arrangements?

Comments:

Potentially yes. We agree that this is a potential way forward if the review has evidence of the FRA getting in the way of effective operational decision making. However, the review does not contain this evidence.

Q12. 12. Do you have any other proposals for how to reform FRA governance which meet the criteria in Chapters 1 and 2?

No

Q13. 13. Do you agree that FRAs and local authorities should agree the level of FRA funding each year, with a reserve arbitration power for the Welsh Ministers?

Yes

Comments:

We consider that this is an improvement on the current levy arrangement. The proposed mechanism could put a single member in a conflicted position, especially agreement of budgets.

Q14. 14. Do you agree that, in the longer term, FRAs should have powers to set a council tax precept, with the balance of their funding from Welsh Government grants?

Yes

Comments:

We are not convinced that this offers a significant improvement over the current levy system. We do not have sufficient information to comment on the proportion of funding that should be provided by Welsh Government.

Q15. 15. Do you have any other proposals for how to reform FRA funding which meet the criteria in Chapters 1 and 2?

No

Q16. 16. Do you agree that the performance management system for FRAs should be grounded in the National Framework for Fire and Rescue Services?

Yes

Comments:

This is acceptable in principle, but there are not sufficient details in the review to comment further.

Q17. 17. Do you agree with the need for such a system to give FRAs flexibility on planning and reporting cycles, and on the sources of information about performance that they use?

Yes

Q18. 18. Do you agree that the Welsh Ministers should retain their duty to report to the Assembly about delivery of the Framework, and their powers of intervention?

Yes

Comments:

This would be an important piece of oversight if a national framework were to be put in place.

Q19. 19. We would like to know your views on the effects that the policy proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

We consider the proposals will have a neutral impact

Q20. 20. Please also explain how you believe the policy proposals could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

We consider the proposals will have a neutral impact

Q21. 21. We have asked a number of specific questions about FRA governance, finance and performance management. If you have any related issues which we have not specifically addressed, please use this space to report them.

The review does not appear to address how the potential synergies between the Fire and Rescue Service and other "blue light" services may be further developed. This may well happen anyway; the draft MAWWFRS corporate plan 2019-24 contains an action around "Continued development of Fire Medical response ... "

Q22. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name Dan Shaw on behalf of Cabinet following internal consultation

Organisation (if applicable) Pembrokeshire County Council

Q23. If you want to receive a receipt of your response, please provide an email address. Email address

[REDACTED]

Q24. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response

Response 17

Swyddfa Comisiynydd yr Heddlu a Throseddau, Gwent
Office of Police and Crime Commissioner, Gwent
Pencadlys Heddlu Gwent | Gwent Police Headquarters,
Croesyceiliog, Cwmbrân, NP44 2XJ
Ffôn | Tel: 01633 642 287
E-bost | Email: commissioner@gwent.pnn.police.uk
Gwe | Web: www.gwent.pcc.police.uk



To Whom It May Concern,

Please find below a response to the Welsh Government White Paper on Fire and Rescue Authorities Reform, provided on behalf of the Police and Crime Commissioner for Gwent.

1) Do you agree the objectives for reform are appropriate and important?

We agree that the objectives for reform are important to maintain the high standards of the Fire Service and respond to the emerging long-term challenges faced both by the Service and people of Wales.

2) Are there any other objectives that the reform programme should pursue?

None Identified.

3) Do you agree that FRAs should remain as separate and distinct entities with the same boundaries as now?

Given the employment numbers of the three Fire and Rescue Services in Wales, we do not see capacity to create additional FRAs to cover smaller boundary areas. Moreover, we do not think a national Fire Service would sufficiently address the wide-range of specific and local needs faced by communities throughout Wales. Therefore, we agree that FRAs should remain as separate and distinct entities with the same boundaries as now. |

4) Do you agree that transferring control of fire and rescue services to Police and Crime Commissioners or local authorities would not be appropriate?

While some PCCs in England have decided to accept control of fire and rescue services, we do not believe this would be appropriate in Wales given that fire and police boundaries, excluding North Wales, are not coterminous. However, we welcome any opportunity for further collaboration with Fire Services, including the sharing of resources across the two services.

5) Do you agree that there are legitimate but limited national interests in the Service that need to be reflected in its governance arrangement?

We agree that there are legitimate but limited national interests that should be delivered upon by the Service. Greater clarity on the current status of the Fire and Rescue National Framework and performance management systems may be a suitable way of reflecting these interests.



6) Do you agree local authorities should continue to nominate FRA members?

Councillor nomination for FRA membership provides consistency in the provision of a service delivered by those with knowledge of local risks and conditions. We do not see any need to alter current nomination arrangements.

7) Do you think that local authorities should nominate one FRA member each, drawn from their cabinets?

The important and essential role of fire and rescue services is beyond doubt. However, the present arrangement for FRA membership is disproportionate to other bodies when viewed in line with the amount of devolved spending they account for. Therefore, we support making FRA membership proportionate.

8) Do you believe any changes are needed to the size and re-numeration of council cabinets, if their members were also to serve on FRAs?

To ensure cabinet members are best placed to fulfil the responsibilities of their position, it may be necessary to increase the size of local authority cabinets. We do feel that it is our place to comment upon re-numeration arrangements for FRA members.

9) Do you agree that FRAs should also have non-executive members?

Non-executive members could provide expert advice to FRA members in decision making. In this capacity, we believe the appointment of non-executive members would be beneficial.

10) Who should appoint non-executive members of FRAs?

Provided that the process for appointing non-executive FRAs members is fair and open and ensures that those appointed to FRAs have the expertise to fulfil their advisory function, we believe that Local Authorities or Welsh Ministers could perform this role.

11) Do you have any views on the longer term proposal that responsibility for the service should vest in a statutory Chief Fire Officer, with FRAs fulfilling a scrutiny and oversight role? If so, would that require any change to membership arrangements?

Scrutiny and oversight are essential for maintaining high service standards. However, the model proposed is limited by the fact that FRA members are not sufficiently accountable to the public because they are appointed, rather than elected. An elected office with responsibility for oversight may wish to be considered as a means of providing public accountability.

12) Do you have any other proposals for how to reform FRA governance which meet the criteria in Chapters 1 and 2?

None identified.

13) Do you agree that FRAs and local authorities should agree the level of FRA funding each year, with a reserve arbitration power for Welsh Ministers?

We support increased accountability in budgetary decisions. It is important that measures be in place to ensure budgets are delivered in the event that FRAs and local authorities cannot agree on funding levels. Reserving arbitration powers for Welsh Ministers could be a suitable way to guarantee this.

14) Do you agree that, in the longer term, FRAs should have powers to set a council tax precept, with the balance of their funding from Welsh Government grants?

Funding services through a combination of council tax precepts and Welsh Government grants allows for security in providing a consistent and effective service in a time of pressure on public finances. However, we believe that it is necessary to first consult the public before introducing additional precepts.

15) Do you have any other proposals for how to reform FRA funding which meet the criteria in Chapters 1 and 2?

No further proposals to contribute.

16) Do you agree that the performance management system for FRAs should be grounded in the National Framework for Fire and Rescue Services?

The National Framework for Fire and Rescue Services outlines a strategic vision aligned with key Welsh legislation and provides scope for further collaboration between public services. It is hoped that a performance management system grounded in the National Framework would establish mechanisms to deliver further partnerships.

17) Do you agree with the need for such a system to give FRAs flexibility in planning and reporting cycles, and on the sources of information about performance that they use?

We recognise the challenges and long-term transformational work the Service is faced with. However, there should be clarity in the definition of 'flexible deadlines'. Regarding the sources of information about performance, we agree that FRAs should be able to draw on relevant sources to evidence the services they have provided.



18) Do you agree that the Welsh Ministers should retain their duty to report to the Assembly about delivery of the Framework, and their powers of intervention?

We do not see any reason to remove from powers of intervention or the duty to report to the Assembly about the delivery of the National Framework from Welsh Ministers.

19) Any impact on Welsh Language?

None identified.

20) How could policy proposals could be formulated or changed to increase positive effects on Welsh language?

No comment.

21) Any related issues about FRA governance, finance and performance management that have not been specifically addressed?

None identified.

Response 18

Appendix 2 Reform of Fire & Rescue Authorities in Wales

Consultation Response Form

Robert Robins, Head of Democratic Services,

On behalf of Flintshire County Council

[REDACTED]

County Hall, Mold, CH7 6NR

Question 1: Do you agree the objectives for reform are appropriate and important?

Response: No. The objectives of the reform seek to make changes where there is no evidence of need. Paragraph 1.25 is somewhat dismissive of the role and value of the 'back bench' Councillors who are appointed to the FRAs. In Flintshire's case, whilst the nominees are, as they must currently be, non-executive Members, there is a wealth of local authority leadership experience, with several having held major regulatory committee chairs.

Question 2: Are there other objectives that the reform programme should pursue?

Response: The most significant requirement is for FRAs to become precepting rather than levying bodies. The Council Tax payer should be able to see on their Council Tax bill what they are paying for the FRA and Fire and Rescue services.

Question 3: Do you agree that FRAs should remain as separate and distinct entities, with the same boundaries as now?

Response: Yes.

Question 4: Do you agree that transferring control of Fire and Rescue Services to Police and Crime Commissioners or local authorities would not be appropriate?

Response: Yes, it is agreed that it would be inappropriate to transfer control of Fire & Rescue Services to Police & Crime Commissioners, for the reasons given within the White Paper.

Question 5: Do you agree that there are legitimate but limited national interests in the service that need to be reflected in its governance arrangements?

Response: This has not been sufficiently considered within the consultation document for an informed decision to be made one way or the other.

Question 6: Do you agree that local authorities should continue to nominate FRA members?

Response: Yes.

Question 7: Do you agree that local authorities should nominate one FRA member each, drawn from their Cabinets?

Response: No. The current arrangements where local authorities nominate based on population is a fairer system than each local authority having one vote, which would not be equal across the FRA area. Under the proposal, a Flintshire vote would have less 'weight' than Anglesey which has a much lower population. This is not equitable and would be out of proportion to the financial contribution currently made by constituent authorities, which is based on their population size.

In addition, the role of a Cabinet member is already meant to be the equivalent of a full time job, as the Independent Remuneration Panel for Wales have identified during discussions with local authorities across Wales.

A reduction in membership from the current 28 to 6 Members would significantly reduce the 'Member' capacity of the NWFRA, and of the other two Welsh FRAs, which would also then have an impact on those organisations' resilience. This would not be a safe or proportionate change to make.

Question 8: Do you believe any changes are needed to the law on the size and remuneration of Council Cabinets to allow their members also to serve on FRAs?

Response: No – no evidence or argument has been put forward for this. It is certainly not the 'promising option' referred to in paragraph 3.10

Question 9: Do you agree that FRAs should also have non-executive members?

Response: No – within the White Paper, no evidence or argument has been put forward for this. We would have liked to have heard why this approach is being considered, so as to be able to understand the impetus for this. Not providing evidence suggests that this is a change being made for the sake of a change, which is not a sustainable point. The introduction of ‘non-executive’ directly appointed Members would effectively replicate the governance structure used for the National Parks. This might work for them. However, the current FRA structure certainly works very effectively in North Wales and has produced a stable governance structure over two decades.

Question 10: Who should appoint non-executive members of FRAs?

Response: No effective argument has been made for the appointment of non-executive members of FRAs. However, the arrangements for appointment to the National Park Authorities does offer one solution. However, that would be a retrograde step, taking a ‘local’ decision away from the areas served and moving it to the Welsh Government.

If it is believed that FRAs should have directly appointed non-executive members, (and so far the case has not been compellingly put) then these should be chosen by the FRAs themselves, in the same way that local authorities currently appoint lay members of their Audit and Standards Committees. We know from experience that such an approach can produce high calibre candidates who make a significant contribution. The Committees are richer in experience and knowledge for having the lay members amongst their number. Those lay members, who are not interested in participating in local politics would probably not stand for election, or want to have a ward work load as their elected colleagues have..

Question 11: Do you agree that, in the longer term, responsibility for the services should vest in a statutory Chief Fire Officer, with FRAs fulfilling a scrutiny and oversight role? If so, would that require any change to membership arrangements?

Response: No. The status quo should prevail for FRAs, as they are already strong and accountable, with an effective level of delegation to their Chief Fire Officers. However, we do think that the Chief Fire Officer role itself should become a statutory role, similar in functions to a local authority’s head of paid service. Given the relatively small size of FRAs, any other changes could become bureaucratic.

Question 12: Do you have any other proposals for how to reform FRA governance which meet the criteria in Chapters 1 and 2?

Response: Given the small size of FRAs currently, unnecessary changes to governance arrangements could become bureaucratic and more costly.

Question 13: Do you agree that FRAs and local authorities should agree the level of FRA funding each year, with a reserve arbitration power for the Welsh Ministers?

Response: No. FRAs should be precepting authorities on the same basis as the Police & Crime Commissioners. They should continue to consult on their plans, but make their own decisions which are then reflected in a clear entry on Council Tax bills. The current levy arrangement lacks transparency and is divisive.

Question 14: Do you agree that, in the longer term, FRAs should have powers to set a Council Tax precept, with the balance of their funding from Welsh Government grants?

Response: Not exactly. FRAs becoming precepting authorities should be in the shorter, rather than the longer term. They should be required to formally consult the constituent authorities and the public as part of this process. It would be the most effective way of reforming FRA governance and provide much needed clarity in their funding source.

Question 15: Do you have any other proposals for how to reform FRA funding which meet the criteria in Chapters 1 and 2?

Response: Please see the responses to Questions 13 and 14. The emphasis should be on formal consultation on spending with stakeholders: the public and the constituent authorities.

Question 16: Do you agree that the performance management system for FRAs should be grounded in the National Framework for Fire & Rescue services?

Response: This is a technical question for FRAs themselves. More detail of the performance management system should have been provided within the White Paper to enable other responders to the White Paper give an objective response.

Question 17: Do you agree with the need for such a system to give FRAs flexibility on planning and reporting cycles, and on the sources of information about performance that they use?

Response: Yes.

Question 18: Do you agree that the Welsh Ministers should retain their duty to report to the Assembly about delivery of the Framework, and their powers of intervention?

Response: Yes. This currently works.

Question 19: We would like to know your views on the effects the policy proposals would have on the Welsh language , specifically on opportunities for people to use Welsh and on treating the Welsh language no less favorably than English?

What effects do you think there would be? How positive effects could be increased, or negative effects be mitigated?

Response: This cannot be answered on the basis of information provided within the consultation document. FRAs are already required to meet Welsh Language standards.

Question 20: Please explain how you believe the policy proposals could be formulated so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language and on no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Response: This cannot be answered on the basis of information provided within the consultation document.

Question 21: We have asked a number of specific questions about FRA governance, finance and performance management. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here: - At the meeting of the Council's Corporate Resources Overview & Scrutiny Committee, held on 17th January 2019, the unanimous view was that the current governance model works, is strong, and therefore should not be altered. The sole change required is in financing, so that Fire & Rescue Authorities become precepting rather than levying bodies.

Response 19

Reform of fire and rescue authorities in Wales

Submit your response

Q1. 1. Do you agree the objectives for reform are appropriate and important?

No

Comments:

I find the White Paper's argument for the need for reform to be totally unconvincing.

Q2. 2. Are there other objectives that the reform programme should pursue?

No

Q3. 3. Do you agree that Fire and Rescue Authorities (FRAs) should remain as separate and distinct entities, with the same boundaries as now?

Yes

Comments:

The existing arrangements are working extremely well and acknowledged by the public as being a good service and good value for money.

Q4. 4. Do you agree that transferring control of fire and rescue services to Police and Crime Commissioners or local authorities would not be appropriate?

No

Comments:

As above.

Q5. 5. Do you agree that there are legitimate but limited national interests in the Service that need to be reflected in its governance arrangements?

No

Q6. 6. Do you agree that local authorities should continue to nominate FRA members?

Yes

Q7. 7. Do you agree that local authorities should nominate one FRA member each, drawn from their cabinets?

No

Comments:

Cabinet Members are already overloaded with responsibilities connected with their individual constituent authorities, particularly with the additional responsibilities handed to them from Welsh Government i.e. Human Trafficking, Wellbeing of Future Generations, Child Sexual Exploitation, Welsh Language Standards etc. Adding Fire Authority responsibilities to that already large workload would be a retrograde step and not result in better service delivery.

Q8. 8. Do you believe any changes are needed to the law on the size and remuneration of council cabinets, to allow their members also to serve on FRAs?

No

Comments:

As above.

Q9. 9. Do you agree that FRAs should also have non-executive members?

No

Comments:

The current arrangement work extremely well.

Q10. 10. Who should appoint non-executive members of FRAs?

See above

Q11. 11. Do you agree that, in the longer term, responsibility for the service should vest in a statutory Chief Fire Officer, with FRAs fulfilling a scrutiny and oversight role? If so, would that require any change to membership arrangements?

No

Q11. 11. Do you agree that, in the longer term, responsibility for the service should vest in a statutory Chief Fire Officer, with FRAs fulfilling a scrutiny and oversight role? If so, would that require any change to membership arrangements?

Comments:

Already covered in previous responses.

Q12. 12. Do you have any other proposals for how to reform FRA governance which meet the criteria in Chapters 1 and 2?

No. See previous comments.

Q13. 13. Do you agree that FRAs and local authorities should agree the level of FRA funding each year, with a reserve arbitration power for the Welsh Ministers?

Yes

Q14. 14. Do you agree that, in the longer term, FRAs should have powers to set a council tax precept, with the balance of their funding from Welsh Government grants?

No

Q15. 15. Do you have any other proposals for how to reform FRA funding which meet the criteria in Chapters 1 and 2?

No

Q16. 16. Do you agree that the performance management system for FRAs should be grounded in the National Framework for Fire and Rescue Services?

Yes

Q17. 17. Do you agree with the need for such a system to give FRAs flexibility on planning and reporting cycles, and on the sources of information about performance that they use?

Yes

Q18. 18. Do you agree that the Welsh Ministers should retain their duty to report to the Assembly about delivery of the Framework, and their powers of intervention?

Yes

Q19. 19. We would like to know your views on the effects that the policy proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

The Mid and West Wales Fire and Rescue Authority has a robust Welsh Language Policy that conforms to Welsh Language Standards. The Welsh language is treated no less favourably than English, and simultaneous translation service is available in all meetings of the Fire Authority.

Q20. 20. Please also explain how you believe the policy proposals could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

As above.

Q21. 21. We have asked a number of specific questions about FRA governance, finance and performance management. If you have any related issues which we have not specifically addressed, please use this space to report them.

No Response

Q22. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name Arwyn Nigel Woolcock
Organisation (if applicable) Neath Port Talbot County Borough Council

Q23. If you want to receive a receipt of your response, please provide an email address. Email address

[REDACTED]

Q24. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response

Response 20

Consultation Response Form

Your Name: Councillor Richard Clark
Organisation: Torfaen County Borough Labour Group
Email: [REDACTED]

Address: Civic Centre, Pontypool NP4 6YB

General Remarks

The White Paper sets out criteria for reform and suggests under various headings what reform could mean. In the majority of cases used in the paper it advises what reforms it is not considering. The case for reform is neither explicit nor evident within the White Paper and at best appears process rather than outcome focused. Accordingly we would argue the status quo be maintained until such time that there is a clear case for reform and a clear understanding of the outcomes to be achieved.

That said the White paper asks a number of questions and our views on those questions are listed below.

Question 1: Do you agree the objectives for reform are appropriate and important?

The presented criteria are quite plausible and can justify the production of this consultation document however we do not feel they set out a case for reform. There are serious questions raised from them in particular the perceived democratic deficit. This is a perceived deficit as the WG are not directly responsible for their “control” or FRA’s are not directly answerable to the electorate. Where the consultation provides examples how such accountability exists within public services it fails to acknowledge that there are other public service models which face the same criticism. Accordingly unless there is to be reform across the board on acceptable governance models for public services the question has to be asked why there is a necessity to reform Fire & Rescue Services in Wales. It feels that a decision was made to reform FRA’s and a paper written to justify it.

As a group we retain confidence in the current governance arrangements but will in answers below offer suggestions how the current situation can be improved.

Question 2: Are there other objectives that the reform programme should pursue?

The group does not believe that the reform programme continues within the narrowly determined criteria outlined in the consultation. The current system works and works well as local authority councillors we have had no representations from our electorate that they have issues with the FRA. Members of the group have also praised our two backbench councillors who sit on the Authority for their engagement with Members.

We recognise that there are areas where the current arrangements can be enhanced and will set these out in our answers below.

Question 3: Do you agree that FRA’s should remain as a separate and distinct entities, with the same boundaries as now?

Observed in isolation we believe that the FRA’s should remain as a separate and distinct entities, with the same boundaries as now. With the myriad of foot prints that exist within the public sector such as: Health Services; the police; local authorities we do not see any purpose in changing the boundaries.

Question 4: Do you agree that transferring control of fire and rescue services to Police and Crime Commissioners (PCC) or local authorities would not be appropriate?

Broadly we agree with the proposition of the question but not necessarily the reasoning within the paper. The branding of the fire and rescue service could remain even if it were to be accountable to the PCC. The role of PCC was resultant of a similar review undertaken by the Westminster Government (as policing is not a devolved issue) to remove Police Authorities. We do not see this as the way forward for FRA's. Also there are 3 FRAs and 4 PCCs

The group believes that the rationale behind the creation of 3 FRA's in 1995 was and to some degree remains appropriate today and accordingly would not think it appropriate to transfer control of FRA's to single local authorities.

Question 5: Do you agree that there are legitimate but national interests in the Service that need to be reflected in its governance arrangements?

We broadly agree with paragraph 2.11 to 2.13.

The consultation paper almost flippantly dismisses a single FRA for Wales. This appears to be based on local knowledge but goes on to recognise "micro" local knowledge addressing the needs of specific risks within FRA areas. These would remain if there were a single authority. The creation of one single authority, by its very nature, would justify a governance review and review of the relationship with the Welsh Government.

If this were to be considered a single FRA with a directly elected Commissioner and an Executive Committee appointed by public appointment could be worthy of consideration. Although not part of this consultation and indeed not a devolved matter the Police Service in Wales could similarly benefit from a single force and a single directly elected PCC with an Executive Committee appointed by public appointment. The single FRA and indeed the Single PCC could be scrutinised on a regional basis by a joint Public Service Board (PSB) scrutiny committee on a health board footprint.

Question 6: Do you agree that local authorities should continue to nominate FRA members?

The consultation document implies a democratic deficit in the appointment of FRA members unless they are directly elected to the position. However nowhere in the document is this actually suggested. The only non-LA appointed members proposed in the consultation are the non-executive positions appointed by public appointment.

We believe the current system works well and allows a local link between local authorities and FRA. We recognise the need for challenge and FRA's could be scrutinised on a regional basis by a joint PSB scrutiny committee on a health board footprint.

Question 7: Do you think that local authorities should nominate one FRA member each, drawn from their cabinets?

We accept that there is potentially a need to reduce the number of LA appointees to the FRAs and would accept each authority having the same number of appointees. As the paper suggests the members first priority as a member of the FRA is the FRA not their nominating authority accordingly the number of appointees per any one authority is moot. That said given the range of sub committees required for the FRA we feel the minimum membership should be 2 per authority.

We totally oppose the appointment focus on cabinet members. It is for each individual authority to appoint the two members the authority believes should serve on the FRA irrespective of their role within that Local Authority. The capability of the individual should be based on in role training and experience and not Cabinet, Scrutiny or regulatory position. Members expressed concern that, whilst the papers seeks to offer reassurances to the contrary, the paper is effectively saying backbench members are not fit for purpose which, if it were the case, we find insulting.

Question 8: Do you believe any changes are needed to the size and remuneration of council cabinets, if their members were also to serve on FRA's?

We refer to our answer (question 7) above in relation to LA appointees being solely LA cabinet members. That is not to say an LA cannot appoint cabinet members should they be the individuals that LA wishes to appoint.

In terms of remuneration this is, as rightly outlined, a matter for the Independent Remuneration Panel (IRP). That said members feel that to reflect the work undertaken on behalf of the FRA any member irrespective of their position of the Council and receipt of a LA special responsibility allowance should be entitled to remuneration.

As to the size of Cabinets we think that is again a matter for the IRP and cabinet members (though not exclusively cabinet members) serving of FRAs could be part of the debate.

Question 9: Do you agree the FRAs should also have non-executive members?

We appreciate that decisions of the FRAs could be challenged by non-executive members but surely that implies there currently is no challenge by FRA members. It is ironic that the paper argues for greater public accountability then seeks to appoint non- elected members.

As stated in our answer to question 6 we recognise the need for challenge and FRA's could be scrutinised on a regional basis by a joint PSB scrutiny committee on a health board footprint.

Question 10: Who should appoint non-executive members of FRAs?

If the Minister is minded to follow this approach then a transparent public appointment process would be preferable. We would suggest that the resultant candidates from such a process are interviewed by a Committee of the FRA and they recommend a candidate for ministerial appointment, or otherwise.

Question 11: Do you have any views on the longer term proposal that responsibility for the service should vest in a statutory Chief Fire Officer, with FRA's fulfilling a scrutiny and oversight role? If so, would that require any change to membership arrangements?

In our answers above we have set out our preference for the retention of the existing FRA structure with a net reduction in appointed members and a proposal for "local" scrutiny. Whilst not suggesting it as a replacement to FRAs in preference to the proposal in this question we have outlined in our answer to question 5 a directly elected Fire Commissioner and a publically appointed executive with "local" scrutiny.

Question 12: Do you have any other proposals for how to reform FRA governance which meet the criteria in Chapters 1 and 2?

We refer you to our answer to question 5 and in particular the section replicated below:

The creation of one single authority, by its very nature, would justify a governance review and review of the relationship with Welsh Government. If this were to be considered, a single FRA directly elected Commissioner and an Executive Committee appointed by public appointment could be worthy of consideration. The single FRA could be scrutinised on a regional basis by a joint Public Service Board (PSB) scrutiny committee on a health board footprint.

Question 13: Do you agree that FRAs and local authorities should agree the level of FRA funding each year, with a reserve arbitration power for the Welsh Ministers?

In considering the proposals to reform FRAs funding we welcome that the two options reflected in questions 13 and 14 are the preferred options of the paper. We would find it difficult to support the other mooted options for similar reasons to their dismissal in the paper.

Members were not aware of a breakdown in communication between FRAs and LAs within the current funding formula. That said we broadly accept that there should be mutual agreement between FRAs and LAs. If this were not possible as a last resort it would be acceptable for Welsh Ministers to have a reserve arbitration power to resolve deadlock.

Such a mutual approach would also necessitate the flow of information from LA appointees to their LA so that LAs can make informed decisions

Question 14: Do you agree that, in the longer term, FRAs should have powers to set a council tax precept, with the balance of their funding from Welsh Government grants?

We broadly support the introduction of FRA precept. In the spirit of transparency which this paper seems to desire it would be clear to residents what the cost of the FRA is and how much they individually contribute to it.

Question 15: Do you have any other proposals for how to reform FRA funding which meet the criteria in Chapters 1 and 2?

No

Question 16: Do you agree that the performance management system for FRAs should be grounded in the National Framework for Fire and Rescue Services?

It is clear that the FRAs are not an “easy fit” into what was by design a measure for LAs Accordingly it would be logical for the National Framework to drive the performance management system for FRAs

Question 17: Do you agree with the need for such a system to give FRAs flexibility on planning and reporting cycles, and on the sources of information about performance that they use?

For all public services we feel there should be a flexibility on planning and reporting cycles. Whilst there are 3 FRA the commonality should be close so that there can be a clear and real comparison of each. This allows each to benefit from good practice. This should not deter innovation and/or local priorities

Question 18: Do you agree that the Welsh Ministers should retain their duty to report to the Assembly about delivery of the Framework, and their powers of intervention?

If, as proposed, the Framework becomes the performance management system for FRAs then the duty of Ministers to report to the Assembly is right and proper. The need to report back on its powers of intervention only require to be communicated if those powers change; are being considered to be used or indeed are used

Question 19: We would like to know your views on the effects that the policy proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

We have no observations on this question

Question 20: Please also explain how you believe the policy proposals could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

We have no observations on this question

Question 21: We have asked a number of specific questions about FRA governance, finance and performance management. If you have any related issues which we have not specifically addressed, please use this space to report them:

We have no other issues other than our remarks in the pre question general comments.

We are happy for our responses to be made public.

Response 21

Consultation Response Form

Your name: Rhondda Cynon Taf County Borough
Council

Organisation (if applicable):

email / telephone number:

[REDACTED]

Your address: Council Offices, Clydach Vale,
Tonypandy CF40 2XX

Question 1: Do you agree the objectives for reform are appropriate and important?

We agree that some aspects of the governance and accountability of Fire and Rescue Services in Wales require reform in respect of financial accountability and the modernisation of performance and accountability requirements. However, we do not agree that the structure of Fire and Rescue Authorities, in terms of their political membership and leadership, should be changed.

Question 2: Are there other objectives that the reform programme should pursue?

We agree to the proposed changes to widen the role of the South Wales Fire and Rescue Service to deliver a wider community preventative brief supporting other public services such as the ambulance service, health service and supporting our most vulnerable residents to remain safe and well in their homes, is very welcomed.

Question 3: Do you agree that FRAs should remain as separate and distinct entities, with the same boundaries as now?

Yes.

Question 4: Do you agree that transferring control of fire and rescue services to Police and Crime Commissioners or local authorities would not be appropriate?

Yes.

Question 5: Do you agree that there are legitimate but limited national interests in the Service that need to be reflected in its governance arrangements?

Yes we agree that there in times of national emergencies such as terrorism attacks, widespread fires, major flooding incidents etc that a national approach will need to be adopted. As a result the National Framework could be strengthened to support such incidents.

We believe the Fire and Rescue Services should be able to determine their own strategic direction based upon the risk factors in their communities in terms of

demographics, geography and the types of building/facilities/installations that are within their area. They should be able to determine their own plans and budgets, and they should be able to set their performance and outcome measures in collaboration with the other services in Wales. We believe that the current support and intervention protocol allows Welsh Government the assurance it needs and that the Fire and Rescue Services are operating effectively.

Question 6: Do you agree that local authorities should continue to nominate FRA members?

Yes, we strongly agree with this proposal and we do not think that the current system requires reform. We disagree with the assertion in the White Paper that 'backbenchers' do not have the required expertise and capacity to carry out their role effectively. Members sit on several Fire Authority committees and have provided a dedicated scrutiny role in carrying out this function on behalf of the local authority. Local authority elected members come from a wide range of backgrounds with a wide range of skills. Members are selected based upon what they may bring to the Fire Authority and how they could enhance the process. We do not subscribe to the view that being a 'backbencher' indicates that someone is less valuable than a Cabinet Member. Indeed skills may be present in elected members that are not required for a Cabinet role but are valuable to Fire Authorities.

We believe that the local authority should continue to nominate four members as it does now. We believe that the level of commitment required to support the business of the Fire and Rescue Authority requires this number of elected members as we fail to see how a single member would have the capacity to undertake the role. Many of our members are also employed and because of this they would not have the ability to take on the role single handed. The benefit of drawing on their expertise in other roles, which may be directly related to their employment, is of benefit to both the local authority and the fire authority. This proposal devalues the essential role that our elected members play in ensuring the democratic accountability of the communities they serve and negates the fact that they are representing the whole authority when they sit on the Fire Authority and not their own constituencies.

Question 7: Do you agree that local authorities should nominate one FRA member each, drawn from their cabinets?

No. We do not think that it requires a Cabinet Member to conduct this role. Cabinet Members have significant portfolios within the Local Authority. Asking a Cabinet Member to also effectively discharge the local authority responsibility to the Fire Authority alongside their responsibility to local authority services is not practical.

Question 8: Do you believe any changes are needed to the law on the size and remuneration of council cabinets, to allow their members also to serve on FRAs?

No, we don't not believe that the size of local authority Cabinets should increase to fulfil this role. Neither do we believe that remuneration of Cabinet Members should be increased. There is a cost to the local taxpayers in increasing the size of the Cabinet.

We believe that we have the correct balance for the senior executive and the role they undertake for the local authority. Increasing the number of Cabinet Members would increase the overall costs of Cabinet. Remuneration through special responsibility allowance is more appropriate for Elected Members who take on this role alongside their constituency and local authority scrutiny functions.

Question 9: Do you agree that FRAs should also have non-executive members?

No. If funding of the FRA is to be generated through local authorities either as a levy or a precept, then it is not appropriate that Welsh Government have a role in selecting non-executive members. Furthermore, we are not sure what a non-executive member could add over and above that of elected members.

Question 10: Who should appoint non-executive members of FRAs?

Please see above. This is not an appropriate role for Welsh Government who are removed from the direct relationship with local communities. We do not believe that individuals nominated by Welsh Government will have the expertise required to operate public services. The number of recent examples of weak governance of health boards and other Welsh Government sponsored bodies does not support the argument to replicate this model in Welsh local government.

Question 11: Do you agree that, in the longer term, responsibility for the service should vest in a statutory Chief Fire Officer, with FRAs fulfilling a scrutiny and oversight role? If so, would that require any change to membership arrangements?

We believe that Chief Fire Officers should hold the responsibility for delivering the service. And that the responsibility of the Fire Authority should be to hold the service to account. This should not entail any changes to membership arrangements as we still believe that nominated Elected Members are in the best position to scrutinise the planning and performance of the service.

Question 12: Do you have any other proposals for how to reform FRA governance which meet the criteria in Chapters 1 and 2?

No.

Question 13: Do you agree that FRAs and local authorities should agree the level of FRA funding each year, with a reserve arbitration power for the Welsh Ministers?

Yes, in the very short term, but within the next couple of years we need to change to a council tax precept arrangement, with the majority of the FRA funding deriving from the precept, the national responsibilities being funded directly by WG grants, and the health and well-being preventative agenda along with the early responder provision being funded by Welsh Government and/or the local health boards.

Question 14: Do you agree that, in the longer term, FRAs should have powers to set a council tax precept, with the balance of their funding from Welsh Government grants?

Yes, but where the council tax precept is the primary funding mechanism as per question 13. This ensures the link to local democracy is maintained.

Question 15: Do you have any other proposals for how to reform FRA funding which meet the criteria in Chapters 1 and 2?

As per the response to question 13.

Question 16: Do you agree that the performance management system for FRAs should be grounded in the National Framework for Fire and Rescue Services?

Yes.

Question 17: Do you agree with the need for such a system to give FRAs flexibility on planning and reporting cycles, and on the sources of information about performance that they use?

Yes.

Question 18: Do you agree that the Welsh Ministers should retain their duty to report to the Assembly about delivery of the Framework, and their powers of intervention?

Yes.

Question 19: We would like to know your views on the effects that the policy proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No comment.

Question 20: Please also explain how you believe the policy proposals could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No comment.

Question 21: We have asked a number of specific questions about FRA governance, finance and performance management. If you have any related

issues which we have not specifically addressed, please use this space to report them:

Please enter here:

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

☐

Response 22

Reform of fire and rescue authorities in Wales

Submit your response

Q1. 1. Do you agree the objectives for reform are appropriate and important?

Yes

Q2. 2. Are there other objectives that the reform programme should pursue?

Ye

Comments:

Keep regional and local differences in place especially for rural brigades

Q3. 3. Do you agree that Fire and Rescue Authorities (FRAs) should remain as separate and distinct entities, with the same boundaries as now?

Yes

Q4. 4. Do you agree that transferring control of fire and rescue services to Police and Crime Commissioners or local authorities would not be appropriate?

Yes

Q5. 5. Do you agree that there are legitimate but limited national interests in the Service that need to be reflected in its governance arrangements?

Yes

Q6. 6. Do you agree that local authorities should continue to nominate FRA members?

Yes

Q7. 7. Do you agree that local authorities should nominate one FRA member each, drawn from their cabinets?

Yes

Q8. 8. Do you believe any changes are needed to the law on the size and remuneration of council cabinets, to allow their members also to serve on FRAs?

Yes

Q9. 9. Do you agree that FRAs should also have non-executive members?

Yes

Q10. 10. Who should appoint non-executive members of FRAs?

Open elections

Q11. 11. Do you agree that, in the longer term, responsibility for the service should vest in a statutory Chief Fire Officer, with FRAs fulfilling a scrutiny and oversight role? If so, would that require any change to membership arrangements?

Yes

Q12. 12. Do you have any other proposals for how to reform FRA governance which meet the criteria in Chapters 1 and 2?

No

Q13. 13. Do you agree that FRAs and local authorities should agree the level of FRA funding each year, with a reserve arbitration power for the Welsh Ministers?

Yes

Q14. 14. Do you agree that, in the longer term, FRAs should have powers to set a council tax precept, with the balance of their funding from Welsh Government grants?

Yes

Q15. 15. Do you have any other proposals for how to reform FRA funding which meet the criteria in Chapters 1 and 2?

No

Q16. 16. Do you agree that the performance management system for FRAs should be grounded in the National Framework for Fire and Rescue Services?

Yes

Q17. 17. Do you agree with the need for such a system to give FRAs flexibility on planning and reporting cycles, and on the sources of information about performance that they use?

Yes

Q18. 18. Do you agree that the Welsh Ministers should retain their duty to report to the Assembly about delivery of the Framework, and their powers of intervention?

Yes

Q19. 19. We would like to know your views on the effects that the policy proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No Response

Q20. 20. Please also explain how you believe the policy proposals could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No Response

Q21. 21. We have asked a number of specific questions about FRA governance, finance and performance management. If you have any related issues which we have not specifically addressed, please use this space to report them.

No Response

Q22. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name Christopher Williams

Organisation (if applicable) Mr

Q23. If you want to receive a receipt of your response, please provide an email address. Email address

[REDACTED]

Q24. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response

Response 23

Consultation Response Form

Name: Wendy Thomas (Clerk)

Organisation: Coedffranc Town Council

Email/Telephone: Tel [REDACTED]

Address: Memorial Hall, Off Wern Road, Skewen Park, Skewen, Neath, SA10 6DP

Question 1: Do you agree the objectives for reform are appropriate and important?

Coedffranc Town Council are of the opinion that reform of the Fire Services in Wales is unnecessary in that they already meet their objectives and the amendments stated within the paper will add very little to the public and will distance local decisions to a central point further from the users throughout the communities. Whilst we support service improvements throughout the public sector the paper fails to demonstrate how these will be made and greater efficiencies could be made from amendments to underperforming services rather than an emergency service that consistently delivers.

We are of the opinion that locally elected members provide the necessary governance, accountability and scrutiny which exists in all other levels of national and local government so why would changing the structure guarantee radical improvements.

The Fire service have a good track record on consulting with community groups on their aims and objectives and have been extremely successful in delivering services which prevent fires and accidents rather than focusing on a reactive service.

Any changes to the current structures would inevitably have impacts on front line services despite the paper stating this will not occur.

Question 2: Are there other objectives that the reform programmes should pursue?

Coedffranc Town Council support the changes to a precept funding model which would give greater transparency on the cost of Fire Service to the local communities just as the Town/Community Councils and the Police do. At present, very little is known on the funding mechanism through Local Authorities and how much each service is costing. A move to precept funding would give greater challenge and scrutiny from elected members and the public.

Question 3: Do you agree that FRAs should remain as separate and distinct entities, with the same boundaries as now?

Yes, we agree that the three Fire and Rescue Services should remain as separate entities with the same boundaries.

Question 4: Do you agree that transferring control of fire and rescue services to Police and Crime Commissioners or local authorities would not be appropriate?

Coedffranc Town Council do not support the Police and Crime Commission control or Local Authority control of the Fire Services in Wales.

Fire is a very different function to the police and local authorities and have a tradition of public engagement and support. The Local Authorities have significant input and control of the Fire Authorities through the appointed members sitting on the current Fire Authority's which we support as the appropriate governance model.

All local authorities are under increased financial pressure and to support services and are looking to off load responsibilities to community groups, therefore moving control of Fire would be a backward step to pre Local Government reforms in 1996 arrangements.

Question 5: Do you agree that there are legitimate but limited national interests in the Service that need to be reflected in its governance arrangements?

We are aware that the Fire services currently collaborate on national arrangements and envisage this to continue into the future.

Question 6: Do you agree that local authorities should continue to nominate FRA members?

Coedffranc Town Council agrees that Local authorities should continue to nominate members as this ensures local leadership and accountability. Local knowledge and local needs are reflected in the services that Fire provide therefore members have greater connection to the communities.

Question 7: Do you agree that local authorities should nominate one FRA member each, drawn from their cabinets?

Coedffranc Town Council do not agree with one member for each Local Authority area. In our Fire Service this would mean six cabinet members controlling the authority which would move away from a stronger democratic and diverse (age, gender, political) make-up of the Authority. It would not reflect the size or needs of the Local Authority areas. Also cabinet members are already under significant pressure with the workload and responsibilities currently in place. We feel this proposal would weaken the structure not enhance it and may increase the cost of the Authority due to cabinet levels of remuneration. As stated above this would be a move away from representation at a local level which currently exists.

Question 8: Do you believe any changes are needed to the law on the size and remuneration of council cabinets, to allow their members also to serve on FRAs?

Coedffranc Town Council states in question 7 above that it does not support this change therefore disagree with any law changes.

Question 9: Do you agree that FRAs should also have non-executive members?

Coedffranc Town Council do not agree as we support the current structure which reflects governance in national and local government who do not have non-executive members. Professional officer's work with members to provide the specialist advice needed and the role of the Authority members is to provide scrutiny and governance.

Locally elected members are accountable to their communities, who would non-executive members be accountable to. This model has not proved successful in other public services whose performance is below the high levels of the fire service.

Question 10: Who should appoint non-executive members of FRAs?

Coedffranc Town Council do not support the appointment of non-executive members as outlines in question 9 above.

Question 11: Do you agree that, in the longer term, responsibility for the service should vest in a statutory Chief Fire Officer, with FRAs fulfilling a scrutiny and oversight role? If so, would that require any change to membership arrangements?

Coedffranc Town Council do not support this proposal as this would be a move away from the governance model which exists at other levels of the public sector. The current model ensures locally elected members with accountability to the public in their communities are responsible as a corporate body.

Question 12: Do you have any other proposals for how to reform FRA governance which meet the criteria in Chapters 1 and 2?

Coedffranc Town Council does not support the need for governance reforms of the Fire Services in Wales therefore we do not have alternative proposals.

Question 13: Do you agree that FRAs and local authorities should agree the level of FRA funding each year, with a reserve arbitration power for the Welsh Ministers?

Our support for the Precept funding model is outlined in our response to question 2. This gives allows greater transparency and accountability of the Fire Services.

Question 14: Do you agree that, in the longer term, FRAs should have powers to set a council tax precept, with the balance of their funding from Welsh Government grants?

Coedffranc Town Council agrees with this proposal.

Question 15: Do you have any other proposals for how to reform FRA funding which meet the criteria in Chapters 1 and 2?

None

Question 16: Do you agree that the performance management system for FRAs should be grounded in the National Framework for Fire and Rescue Services?

The Fire Services should be able to set their own performance management metrics based on the local services they provide. The risks, and services are different across Wales therefore generic measures could provide meaningless information.

Question 17: Do you agree with the need for such a system to give FRAs flexibility on planning and reporting cycles, and on the sources of information about performance that they use?

Agreed as stated in question 16

Question 18: Do you agree that the Welsh Ministers should retain their duty to report to the Assembly about delivery of the Framework, and their powers of intervention?

Agreed

Question 19: We would like to know your views on the effects that the policy proposals would have on the Welsh language, specifically on opportunities for

people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

As we don't support the reforms there should not be any negative effects on the provision of Welsh Language services.

Question 20: Please also explain how you believe the policy proposals could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Reducing the number of Fire Authority members to Six for Mid and North would have a detrimental effect on the use of Welsh language in these Authority's.

Question 21: We have asked a number of specific questions about FRA governance, finance and performance management. If you have any related issues which we have not specifically addressed, please use this space to report them: Please enter here:

None.

Response 24

Reform of fire and rescue authorities in Wales

Submit your response

Q1. 1. Do you agree the objectives for reform are appropriate and important?

Yes

Comments:

I agree that the councillor rest do not truly represent the electorate. The F&RS , like the police and health should have less not more political interference .

Q2. 2. Are there other objectives that the reform programme should pursue?

No

Q3. 3. Do you agree that Fire and Rescue Authorities (FRAs) should remain as separate and distinct entities, with the same boundaries as now?

Yes

Q4. 4. Do you agree that transferring control of fire and rescue services to Police and Crime Commissioners or local authorities would not be appropriate?

No

Q5. 5. Do you agree that there are legitimate but limited national interests in the Service that need to be reflected in its governance arrangements?

Yes

Comments:

With the proviso that I do not like the term "limited"

Q6. 6. Do you agree that local authorities should continue to nominate FRA members?

No

Q7. 7. Do you agree that local authorities should nominate one FRA member each, drawn from their cabinets?

Yes

Q8. 8. Do you believe any changes are needed to the law on the size and remuneration of council cabinets, to allow their members also to serve on FRAs?

Yes

Q9. 9. Do you agree that FRAs should also have non-executive members?

Yes

Q10. 10. Who should appoint non-executive members of FRAs?

Difficult. Should be done in a way that excludes ego trippers.

Q11. 11. Do you agree that, in the longer term, responsibility for the service should vest in a statutory Chief Fire Officer, with FRAs fulfilling a scrutiny and oversight role? If so, would that require any change to membership arrangements?

Yes

Q12. 12. Do you have any other proposals for how to reform FRA governance which meet the criteria in Chapters 1 and 2?

No Response

Q13. 13. Do you agree that FRAs and local authorities should agree the level of FRA funding each year, with a reserve arbitration power for the Welsh Ministers?

Yes

Q14. 14. Do you agree that, in the longer term, FRAs should have powers to set a council tax precept, with the balance of their funding from Welsh Government grants?

Yes

Q15. 15. Do you have any other proposals for how to reform FRA funding which meet the criteria in Chapters 1 and 2?

No

Q16. 16. Do you agree that the performance management system for FRAs should be grounded in the National Framework for Fire and Rescue Services?

Comments:

Unsure on this one as I have a reluctance to support this mechanism.

Q17. 17. Do you agree with the need for such a system to give FRAs flexibility on planning and reporting cycles, and on the sources of information about performance that they use?

Yes

Q18. 18. Do you agree that the Welsh Ministers should retain their duty to report to the Assembly about delivery of the Framework, and their powers of intervention?

Yes

Q19. 19. We would like to know your views on the effects that the policy proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

I cannot see anything here that would have a negative effect.

Q20. 20. Please also explain how you believe the policy proposals could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No Response

Q21. 21. We have asked a number of specific questions about FRA governance, finance and performance management. If you have any related issues which we have not specifically addressed, please use this space to report them.

No Response

Q22. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name Nigel Pearce

Organisation (if applicable) -

Q23. If you want to receive a receipt of your response, please provide an email address. Email address

[REDACTED]

Q24. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response

Response 25

Reform of fire and rescue authorities in Wales

Submit your response

Q1. 1. Do you agree the objectives for reform are appropriate and important?

Yes

Q2. 2. Are there other objectives that the reform programme should pursue?

Ye

Comments:

Firefighters are trained professionals, is there a case for them to encompass becoming trained emergency first aid responders?

Q3. 3. Do you agree that Fire and Rescue Authorities (FRAs) should remain as separate and distinct entities, with the same boundaries as now?

Yes

Comments:

Bearing in mind the comment in the reform paper "reform should therefore create clear and effective leadership of, and accountability for, the development and delivery of fire and rescue services. In particular, this should support full and open debate about the potential for diversifying the service"

Q4. 4. Do you agree that transferring control of fire and rescue services to Police and Crime Commissioners or local authorities would not be appropriate?

Yes

Comments:

Not appropriate

Q5. 5. Do you agree that there are legitimate but limited national interests in the Service that need to be reflected in its governance arrangements?

Yes

Q6. 6. Do you agree that local authorities should continue to nominate FRA members?

No

Q6. 6. Do you agree that local authorities should continue to nominate FRA members?

Comments:

Members should be appointed on the basis of their skill set, expertise, local knowledge and leave the "politics" out of it.

Q7. 7. Do you agree that local authorities should nominate one FRA member each, drawn from their cabinets?

No

Comments:

If Councils are paying for the service then they would want one of their own to be in the know on how the money was being spent.

Q8. 8. Do you believe any changes are needed to the law on the size and remuneration of council cabinets, to allow their members also to serve on FRAs?

Yes

Comments:

If accountability, good governance and management of resources is the principle of the FRA's then any changes would have to be reflected in law as the reform documents states " in law, a combined authority, meaning that it is formed as a combination of the local authorities in its area"

Q9. 9. Do you agree that FRAs should also have non-executive members?

Yes

Comments:

Non-executive members could provide a different perspective in discussions which could help with good governance.

Q10. 10. Who should appoint non-executive members of FRAs?

The firefighters themselves.

Q11. 11. Do you agree that, in the longer term, responsibility for the service should vest in a statutory Chief Fire Officer, with FRAs fulfilling a scrutiny and oversight role? If so, would that require any change to membership arrangements?

Yes

Comments:

Probably

Q12. 12. Do you have any other proposals for how to reform FRA governance which meet the criteria in Chapters 1 and 2?

Chapters 1 & 2 point out the need for change but this will all hinge on where the money comes from to pay for the public service. Money is raised from Council Tax and the Council decides how much to contribute so each council's contribution is going to be varied hence why the Councils appoint members to the FRA, but not necessarily members who make up the cabinet of the council, the cabinet of a council tends to be party politically biased and set budgets but the FRA should be totally above this. It just seems strange to me that in the current set up, Cardiff has 5 members and their contribution is £16k+ and Swansea has 7 members with a contribution of £11K+ and Flintshire 6 members with a contribution of £7k. So reforming the governance seems to be a good idea.

Q13. 13. Do you agree that FRAs and local authorities should agree the level of FRA funding each year, with a reserve arbitration power for the Welsh Ministers?

Yes

Q14. 14. Do you agree that, in the longer term, FRAs should have powers to set a council tax precept, with the balance of their funding from Welsh Government grants?

Yes

Q15. 15. Do you have any other proposals for how to reform FRA funding which meet the criteria in Chapters 1 and 2?

No Response

Q16. 16. Do you agree that the performance management system for FRAs should be grounded in the National Framework for Fire and Rescue Services?

No

Comments:

I agree with " We therefore propose to create a new system under which..... "

Q17. 17. Do you agree with the need for such a system to give FRAs flexibility on planning and reporting cycles, and on the sources of information about performance that they use?

Yes

Q18. 18. Do you agree that the Welsh Ministers should retain their duty to report to the Assembly about delivery of the Framework, and their powers of intervention?

Yes

Q19. 19. We would like to know your views on the effects that the policy proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

I don't think this policy would have any effect on the Welsh Language

Q20. 20. Please also explain how you believe the policy proposals could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

I don't think the policy proposals has any impact on the Welsh Language

Q21. 21. We have asked a number of specific questions about FRA governance, finance and performance management. If you have any related issues which we have not specifically addressed, please use this space to report them.

No Response

Q22. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name

[REDACTED]

Organisation (if applicable) -

Q23. If you want to receive a receipt of your response, please provide an email address. Email address

[REDACTED]

Q24. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

Keep my response anonymous

Response 26

Reform of fire and rescue authorities in Wales

Submit your response

Q1. 1. Do you agree the objectives for reform are appropriate and important?

Yes

Q2. 2. Are there other objectives that the reform programme should pursue?

No

Q3. 3. Do you agree that Fire and Rescue Authorities (FRAs) should remain as separate and distinct entities, with the same boundaries as now?

No

Q4. 4. Do you agree that transferring control of fire and rescue services to Police and Crime Commissioners or local authorities would not be appropriate?

No

Q5. 5. Do you agree that there are legitimate but limited national interests in the Service that need to be reflected in its governance arrangements?

Yes

Q6. 6. Do you agree that local authorities should continue to nominate FRA members?

Yes

Q7. 7. Do you agree that local authorities should nominate one FRA member each, drawn from their cabinets?

Yes

Q8. 8. Do you believe any changes are needed to the law on the size and remuneration of council cabinets, to allow their members also to serve on FRAs?

No

Q9. 9. Do you agree that FRAs should also have non-executive members?

Yes

Q10. 10. Who should appoint non-executive members of FRAs?

La leaders

Q11. 11. Do you agree that, in the longer term, responsibility for the service should vest in a statutory Chief Fire Officer, with FRAs fulfilling a scrutiny and oversight role? If so, would that require any change to membership arrangements?

Yes

Q12. 12. Do you have any other proposals for how to reform FRA governance which meet the criteria in Chapters 1 and 2?

No Response

Q13. 13. Do you agree that FRAs and local authorities should agree the level of FRA funding each year, with a reserve arbitration power for the Welsh Ministers?

Yes

Q14. 14. Do you agree that, in the longer term, FRAs should have powers to set a council tax precept, with the balance of their funding from Welsh Government grants?

Yes

Q15. 15. Do you have any other proposals for how to reform FRA funding which meet the criteria in Chapters 1 and 2?

No

Q16. 16. Do you agree that the performance management system for FRAs should be grounded in the National Framework for Fire and Rescue Services?

Yes

Q17. 17. Do you agree with the need for such a system to give FRAs flexibility on planning and reporting cycles, and on the sources of information about performance that they use?

Yes

Q18. 18. Do you agree that the Welsh Ministers should retain their duty to report to the Assembly about delivery of the Framework, and their powers of intervention?

Yes

Q19. 19. We would like to know your views on the effects that the policy proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

None

Q20. 20. Please also explain how you believe the policy proposals could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No Response

Q21. 21. We have asked a number of specific questions about FRA governance, finance and performance management. If you have any related issues which we have not specifically addressed, please use this space to report them.

No Response

Q22. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name John Henderson

Organisation (if applicable) -

Q23. If you want to receive a receipt of your response, please provide an email address. Email address

No Response

Q24. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response

Response 27

Reform of fire and rescue authorities in Wales

Submit your response

Q1. 1. Do you agree the objectives for reform are appropriate and important?

No

Comments:

The objectives for reform are not clear and don't make the case for change.

Q2. 2. Are there other objectives that the reform programme should pursue?

Ye

Comments:

As always efficiencies should be continually looked for but not at the expense of public safety

Q3. 3. Do you agree that Fire and Rescue Authorities (FRAs) should remain as separate and distinct entities, with the same boundaries as now?

Yes

Q4. 4. Do you agree that transferring control of fire and rescue services to Police and Crime Commissioners or local authorities would not be appropriate?

Yes

Q5. 5. Do you agree that there are legitimate but limited national interests in the Service that need to be reflected in its governance arrangements?

Yes

Comments:

this can be kept under review

Q6. 6. Do you agree that local authorities should continue to nominate FRA members?

Yes

Q7. 7. Do you agree that local authorities should nominate one FRA member each, drawn from their cabinets?

No

Comments:

This would be much more expensive 1 Executive member nearly meeting the 28 members cost, less democratic, could well create alliances and destroy the political balance that exists at the moment. The comments in the report are an insult to current members as Cabinet members are not appointed on ability but by political decisions.

Q8. 8. Do you believe any changes are needed to the law on the size and remuneration of council cabinets, to allow their members also to serve on FRAs?

No

Comments:

They should be concentrating on their duties in Council while accepting their inflated salary.

Q9. 9. Do you agree that FRAs should also have non-executive members?

No

Q10. 10. Who should appoint non-executive members of FRAs?

No Response

Q11. 11. Do you agree that, in the longer term, responsibility for the service should vest in a statutory Chief Fire Officer, with FRAs fulfilling a scrutiny and oversight role? If so, would that require any change to membership arrangements?

No

Q12. 12. Do you have any other proposals for how to reform FRA governance which meet the criteria in Chapters 1 and 2?

No Response

Q13. 13. Do you agree that FRAs and local authorities should agree the level of FRA funding each year, with a reserve arbitration power for the Welsh Ministers?

No

Q14. 14. Do you agree that, in the longer term, FRAs should have powers to set a council tax precept, with the balance of their funding from Welsh Government grants?

Yes

Q15. 15. Do you have any other proposals for how to reform FRA funding which meet the criteria in Chapters 1 and 2?

No

Q16. 16. Do you agree that the performance management system for FRAs should be grounded in the National Framework for Fire and Rescue Services?

Yes

Q17. 17. Do you agree with the need for such a system to give FRAs flexibility on planning and reporting cycles, and on the sources of information about performance that they use?

No

Q18. 18. Do you agree that the Welsh Ministers should retain their duty to report to the Assembly about delivery of the Framework, and their powers of intervention?

Yes

Q19. 19. We would like to know your views on the effects that the policy proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No Response

Q20. 20. Please also explain how you believe the policy proposals could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No Response

Q21. 21. We have asked a number of specific questions about FRA governance, finance and performance management. If you have any related issues which we have not specifically addressed, please use this space to report them.

I believe there should be consideration of combining duties such as finance across the authorities thus avoiding duplication of services.

Q22. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name Bryan Apsley

Organisation (if applicable) Councillor, Llay ward, Wrexham County Borough Council

Q23. If you want to receive a receipt of your response, please provide an email address. Email address

[REDACTED]

Q24. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response

Response 28

Reform of fire and rescue authorities in Wales

Submit your response

Q1. 1. Do you agree the objectives for reform are appropriate and important?

Yes

Q2. 2. Are there other objectives that the reform programme should pursue?

Ye

Comments:

The service Management Structure

Q3. 3. Do you agree that Fire and Rescue Authorities (FRAs) should remain as separate and distinct entities, with the same boundaries as now?

Yes

Q3. 3. Do you agree that Fire and Rescue Authorities (FRAs) should remain as separate and distinct entities, with the same boundaries as now?

Comments:

It is important to retain local control

Q4. 4. Do you agree that transferring control of fire and rescue services to Police and Crime Commissioners or local authorities would not be appropriate?

Yes

Comments:

The PC is struggling to meet their own requirements in times of austerity

Q5. 5. Do you agree that there are legitimate but limited national interests in the Service that need to be reflected in its governance arrangements?

Yes

Q6. 6. Do you agree that local authorities should continue to nominate FRA members?

Yes

Comments:

There needs to be accountability based on population and democracy, appointed members would have a different agenda.

Q7. 7. Do you agree that local authorities should nominate one FRA member each, drawn from their cabinets?

No

Comments:

The LA cabinet members have more than enough work in their respective authorities.

Q8. 8. Do you believe any changes are needed to the law on the size and remuneration of council cabinets, to allow their members also to serve on FRAs?

No

Q9. 9. Do you agree that FRAs should also have non-executive members?

No

Q9. 9. Do you agree that FRAs should also have non-executive members?

Comments:

I do not support this process

Q10. 10. Who should appoint non-executive members of FRAs?

N/A

Q11. 11. Do you agree that, in the longer term, responsibility for the service should vest in a statutory Chief Fire Officer, with FRAs fulfilling a scrutiny and oversight role? If so, would that require any change to membership arrangements?

No

Comments:

No this would result in empire building

Q12. 12. Do you have any other proposals for how to reform FRA governance which meet the criteria in Chapters 1 and 2?

There should be a serious look at the management structure and also the performance monitoring of the service.

Q13. 13. Do you agree that FRAs and local authorities should agree the level of FRA funding each year, with a reserve arbitration power for the Welsh Ministers?

Yes

Comments:

Yes based on budgets provided by their management team.

Q14. 14. Do you agree that, in the longer term, FRAs should have powers to set a council tax precept, with the balance of their funding from Welsh Government grants?

Yes

Comments:

FRAs precept should be removed from the LAs precept as is the Police

Q15. 15. Do you have any other proposals for how to reform FRA funding which meet the criteria in Chapters 1 and 2?

No

Q16. 16. Do you agree that the performance management system for FRAs should be grounded in the National Framework for Fire and Rescue Services?

Yes

Q17. 17. Do you agree with the need for such a system to give FRAs flexibility on planning and reporting cycles, and on the sources of information about performance that they use?

No

Comments:

This should be set centrally

Q18. 18. Do you agree that the Welsh Ministers should retain their duty to report to the Assembly about delivery of the Framework, and their powers of intervention?

Yes

Comments:

There has to be ultimate control.

Q19. 19. We would like to know your views on the effects that the policy proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

This should not impact on the use of Welsh Language.

Q20. 20. Please also explain how you believe the policy proposals could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No Response

Q21. 21. We have asked a number of specific questions about FRA governance, finance and performance management. If you have any related issues which we have not specifically addressed, please use this space to report them.

No Response

Q22. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name

Frank Hemmings

Q22. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Organisation (if applicable) -

Q23. If you want to receive a receipt of your response, please provide an email address. Email address

[REDACTED]

Q24. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response

Response 29

Consultation Response Form

Your name: Councillor Mark Pritchard

Organisation (if applicable):

Wrexham County Borough Council

email / telephone number:

[REDACTED]

Your address:

Wrexham County Borough Council

Guildhall

Wrexham LL11 1AY

Question 1: Do you agree the objectives for reform are appropriate and important?

There was consensus that the objectives of reform, as stated, offered a positive and appropriate description of an effective and accountable FRA. There was a view that that there was a need for increased accountability and transparency of the FRA, although there was an acknowledgement that this could be rooted in perception rather than fact.

However, many Councillors were of the view that the case for change was not a strong one and that there was potential for any current shortcomings to be achieved by working with the current structures and memberships to strengthen roles, expertise and capabilities. For example, constitutional and procedural improvements, training and support.

Reducing and / or changing membership will not in itself deliver better decision-making or an improved calibre of member and the increased workload on fewer members should also be taken into consideration.

Question 2: Are there other objectives that the reform programme should pursue?

Councillors noted the table which demonstrated the relatively high memberships of the FRAs when compared to other bodies, but felt that it would have been useful to have also been provided with the comparative costs of these bodies. There is a need for the reform programme to be mindful of any increase in costs associated with any of its proposals

It would also be beneficial for the reform objectives to reference opportunities for increased collaboration with other emergency and public services.

The reform objectives will not necessarily deliver increased public accountability and transparency. Arguably public accountability will be reduced with reduced representation from local authorities.

Question 3: Do you agree that FRAs should remain as separate and distinct entities, with the same boundaries as now?

Yes. There is a need to retain localism. There is a need for boundaries to be co-terminus with other emergency and public bodies where possible to secure the best possible prospects for effective partnership and collaborative working.

Question 4: Do you agree that transferring control of fire and rescue services to Police and Crime Commissioners or local authorities would not be appropriate?

Yes. This would not be appropriate. It is important for the FRS to remain independent and focused on its core services.

Question 5: Do you agree that there are legitimate but limited national interests in the Service that need to be reflected in its governance arrangements?

Yes.

Question 6: Do you agree that local authorities should continue to nominate FRA members?

Yes, especially if the funding arrangements continue to be an unavoidable commitment within local authority budgets.

Question 7: Do you agree that local authorities should nominate one FRA member each, drawn from their cabinets?

No. Such a reduction in the current membership would result in the loss of significant experience and would not be representative of the different populations in each local authority area. The political balance would also be affected. This would reduce rather than improve public accountability, one of the key objectives of the reforms.

There is an assumption that the nomination of Cabinet members rather than 'backbench' members will increase expertise, but there is no evidence to support this. There is a very diverse range of services provided by local authorities which Cabinet members are responsible for. It is not the best use of a Cabinet members' time to be allocated to such a specific service area.

Question 8: Do you believe any changes are needed to the law on the size and remuneration of council cabinets, to allow their members also to serve on FRAs?

Members did not support the nomination of cabinet members to FRAs for the reasons stated in the answer to question 7 above.

If cabinet members were nominated, however, then there would need to be changes to the law on size and remuneration, but any additional costs should be funded by Welsh Government.

Question 9: Do you agree that FRAs should also have non-executive members?

Whilst there may be some potential benefits of having FRA non-executive members with technical expertise, there was insufficient detail about the nomination and selection criteria to enable a definitive response to this question. Also, having non-elected members would dilute public accountability.

Question 10: Who should appoint non-executive members of FRAs?

This should be done at a local level, preferably by the local authority, to ensure local knowledge as well as expertise

As Welsh Ministers would retain their powers of intervention regarding progress in delivering the National Framework, they should not be involved in the nomination of non-executive members as this could compromise their neutrality in making those nominations.

Question 11: Do you agree that, in the longer term, responsibility for the service should vest in a statutory Chief Fire Officer, with FRAs fulfilling a scrutiny and oversight role? If so, would that require any change to membership arrangements?

No. There may, however, be a need to more clearly define and strengthen the role of FRAs.

Question 12: Do you have any other proposals for how to reform FRA governance which meet the criteria in Chapters 1 and 2?

Whilst current configuration of FRAs should remain, the Fire and Rescue Service could be restructured to have one Head of Service, but with local hubs sitting beneath. This would be more cost effective, improve leadership in terms of national and international factors which transcend FRA borders, whilst retaining local accountability.

Question 13: Do you agree that FRAs and local authorities should agree the level of FRA funding each year, with a reserve arbitration power for the Welsh Ministers?

No. Members were concerned that arbitration would need to take place with 6 different authorities which is time consuming and unnecessary. The preferred option is option C, a council tax precept, as this is more palatable and transparent for the public. This would enable the public to more clearly recognise the link between demand on the fire service and the funding requested through the precept, as the onus will lie with the FRA to explain this.

There was also agreement that some preventative elements of the Fire and Rescue service should be accessed as grant funding directly from WG as long as this did not entail 'top slicing' of local authority funding.

Question 14: Do you agree that, in the longer term, FRAs should have powers to set a council tax precept, with the balance of their funding from Welsh Government grants?

Priority should be given to funding changes, ahead of other proposals in order to implement changes as soon as possible. This should be addressed as soon as possible. Changes to funding arrangements should not negatively impact on Local authority funding.

Question 15: Do you have any other proposals for how to reform FRA funding which meet the criteria in Chapters 1 and 2?

Members raised a number of queries or concerns to consider:

- Any opportunities to eliminate wastage and increase efficiency should be seized;
- Concern was expressed around the funding of equipment loans such as flooding pumps to other authority areas;
- Consider whether revenue should be raised via insurance claims when fire and rescue are in attendance at road traffic accidents.

Question 16: Do you agree that the performance management system for FRAs should be grounded in the National Framework for Fire and Rescue Services?

The National Framework is considered to have provided a good grounding for the previous and current performance management systems for FRAs. It was considered that the framework, in setting out national visions and priorities provided means by which performance improvement has been driven. On this basis the continuation of performance and management system for FRAs grounded in the National Framework is supported.

With reference to the detail of the National Framework it is suggested that this is not required to be overly prescriptive and allow a degree of variation for each Authority to address their distinct local characteristics. It should also not require the reporting of large numbers of key performance indicators to ensure its effectiveness.

Question 17: Do you agree with the need for such a system to give FRAs flexibility on planning and reporting cycles, and on the sources of information about performance that they use?

This is supported, but with a number of caveats that need to be considered.

Although flexibility in such a system is thought to be a positive, the degree of flexibility should not be such that it does not allow direct comparison between FRAs. It needs to be borne in mind that there is a need for easily comparable performance information that is meaningful in measuring impact, but not overly onerous in the process of collection. These types of indicator are considered to be the most important in justifying to the public the expenditure incurred in providing the service. They also provide transparency and reassurance around the provision of service by the FRA.

Reporting cycles should be closely aligned to aid the accessibility and currency of performance information for the reasons outlined above.

Question 18: Do you agree that the Welsh Ministers should retain their duty to report to the Assembly about delivery of the Framework, and their powers of intervention?

There is support for the Welsh Minister to retain their duty and powers as outlined in the question. Continuation of this approach is considered to provide oversight of

FRAs and their delivery of the Framework on a national basis together with a means to address issues of concern, as required.

Question 19: We would like to know your views on the effects that the policy proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated

It was not considered that the proposals would have any impact in this area as long as the required adherence was maintained to the relevant legislation and guidance pertaining to the Welsh language.

Question 20: Please also explain how you believe the policy proposals could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

There were no issues raised in respect of this question.

Question 21: We have asked a number of specific questions about FRA governance, finance and performance management. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

None raised.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

☐

Response 30

Consultation Response Form

Name: South Wales Fire & Rescue Service

Organisation: SWFRS

Email/Telephone: Tel [REDACTED]

Address: SWFRS HQ, Fforest View Business Park, Llantrisant, Rhondda Cynon Taf, CF72 8LX

Question 1: Do you agree the objectives for reform are appropriate and important?

It is not agreed that the objectives for reform are appropriate.

The South Wales FRS is always open to opportunities to improve, but most importantly enhance the service provided to the communities of South Wales.

It is questionable whether some of the identified objectives are the most important issues facing the service today and in the foreseeable future – some key issues that could have a major impact on the Service's ability to continue to deliver an effective and diverse service are outside of both the FRAs and FRSs control. For example:

- The continued and ongoing risk of industrial action through a live pension dispute involving national government both in Wales and at UK level
- The inability of the Services to secure greater diversification of role pending resolution at National Joint Council level (at which the affected FRAs or FRSs have no seat) or Welsh Government level (as per Scotland)
- The operational and financial risks posed by the significant delay of the National Airwave project (now scheduled for 2022, but still not set in stone) where current resources are at end of life
- Terrorist response
- Uncertainty of public sector funding and other issues following Brexit

The Service welcomes clear and effective leadership of, and accountability for the development and delivery of fire and rescue services and would commit to working with whatever governance structure is deemed appropriate. It considers that it has had this good governance over a considerable period, as evidenced by its performance. Good performance goes hand in hand with strong and effective leadership and challenge. In the last ten years alone, SWFRSs performance speaks for itself, and indeed was an area praised in the Williams Report and in the introduction to the White Paper by the then Minister for Local Government and Public Services, Alun Davies AM. Successes include:

- A reduction in the number of incidents attended by over 50% since 2003, whilst at the same time responding to an ever more diverse range of emergency calls, due to the decisive leadership of the FRA to respond in new areas
- A reduction in the number of fires attended by 72% (6,536 incidents attended in 2018 compared with 23,059 incidents in 2003). This is set against a backdrop of increasing population; ageing population; an increase in the number of homes
- A reduction in the number of fatalities from fire by 62% (13 deaths in 2008/09 compared with 5 in 2018)
- A reduction in the number of accidental dwelling fires by 39% (573 incidents today compared to 946 incidents in 2003). This is set against a backdrop of increasing housing numbers and an ageing housing stock in areas of the community
- A reduction in the number of unwanted fire signals attended by 12% (4,423 incidents attended in 2018 compared to 5,033 incidents in 2003). This is set against a backdrop of an increase in the number of business premises within South Wales and an increase in the number of properties having alarm systems. This is also against the backdrop of ageing and greatly extended systems following premise expansion or alteration in some of our higher repeat offenders, in particular health and education establishments who generate the majority of calls. This sector also experiences extreme financial pressures in maintaining such systems appropriately

- An increase in the number of all types of special service calls attended (i.e., any emergency call other than for a fire) from 2,981 calls in 2003 to 3,345 calls attended in 2018. This is set against a backdrop of reduced FRS staffing numbers, reduced fire and rescue station numbers, reducing FRS budgets and a vastly greater array of FRS services provided within existing resources, thereby demonstrating greater efficiency and effectiveness and value added in the services we are able to provide
- A fairly static level of response to road traffic collisions, set against a backdrop of significantly increased numbers of motorists on the roads of South Wales
- An increase in other special service calls (excluding road traffic collisions), including new areas of response such as water and flooding response, bariatric rescue, large animal rescue, rescue at height, urban search and rescue, chemical response and terrorist response, again demonstrating increased value for money for the public of South Wales
- A reduction in real time cash budgets of 14% over the last ten years since austerity bit, with the Service operating today with the same budget levels as it was ten years ago for a more diverse range of incidents
- Collaborative occupation of 8 of its fire and rescue stations, enabling other public services to release capital funding and ongoing revenue expenditure. The sites are predominantly shared with the Welsh Ambulance Service Trust (WAST) at present, with a few sites being tri service or four services in one building (fire, WAST, police and coastguard). We are also actively progressing a number of other collaborative opportunities with our blue light partners; Gwent Police, South Wales Police and WAST through our joint Emergency Services Estates Group
- Collaborative service delivery in a wide range of areas with an equally wide range of partners from fire, the police, the ambulance service, coastguard, local authorities, private sector partners and the voluntary sector

It is also noteworthy that there have been no complaints to the Public Services Ombudsman for Wales in recent years on the service provision provided to the communities of South Wales.

Whilst wishing to remain neutral on any political dimension to governance structures, it is suggested that some of the shortcomings identified within the White Paper in relation to FRA members are not based in fact and would equally apply to all other tiers of local and national government.

The experience of the FRS in working with the FRA is that they have met the challenges facing them head on by effective leadership, scrutiny and decision making. Key and difficult decisions have been taken following extensive scrutiny by constituent local authorities' scrutiny committees and council meetings and public consultation on a variety of issues to ensure the FRS is as efficient, effective and responsive as it needs to be in today's society. These decisions have included closing two fire and rescue stations with resultant redundancies of firefighters; the removal of 2nd appliances with resultant redundancies at those stations; the amalgamation of stations where appropriate with consequent reductions in staffing numbers; a reduction in the number of very specialist appliances where a more efficient method of response has been identified; changes to the crewing arrangements on all wholtime stations resulting in a reduction of 40 firefighter posts without affecting front line service

delivery; the amalgamation of control rooms with an adjoining FRS and one of our Police partners; the provision of some specialist services on an all Wales basis, to name but a few. All of these decisions and changes have been successfully implemented without industrial unrest in a sector that is highly unionised and in some instances following threats against both Members and senior officers of the FRA and FRS.

The assertions that FRA members “do not necessarily have all the capability that they need to provide strategic leadership to the Service or to challenge senior officers” is not grounded or supported by any evidence. Welsh Government officials have not attended FRA or its committee meetings to view members ‘in action’ or witness the extensive experience they possess – it would appear that a desktop review has been undertaken by reviewing minutes of meetings. As any practitioner within the field will be aware, minutes of meetings are not intended to be a comprehensive verbatim record or transcript of proceedings, but a concise record of the decisions that were taken. Challenge of officers and their reports is a regular occurrence and has been complimented by a senior academic professional when they observed several FRA meetings as part of a governance paper they were preparing.

In relation to the assertions on member capability, it is important to consider that the disqualification criteria for standing for election for any publicly elected role are set out clearly in statute. There is no differentiation for those that take on more senior leadership roles within the public body and no requirement for specific skills or experience, presumably reinforcing our democratic principles and process that our public leaders reflect the society we live in. Unless or until there are pre-qualification criteria for election to any public member role (Community Council, LA, AMs, MPs & MEPs) there is no guarantee that an individual appointed to a specific role would have any greater level of skills and competencies to discharge that role. It is suggested that with the structured training programmes that are in place for FRA elected members (and indeed the additional training they receive through their home LAs), any concerns on WG views of gaps in knowledge or experience could be addressed in the same manner as they are in other democratically elected appointments. It is queried why Fire and Rescue Authority Members are being singled out for different treatment than other members elected into public office.

Linked to this, the FRS supports FRAs providing effective strategic leadership and sustaining effective collaboration. The FRS has a very long history of leading and delivering against this already with both emergency service partners, other public sector bodies, the private sector and the third sector. However, given the development of Public Service Boards, National Resilience Forums and the numerous other mechanisms already in existence, it is queried why a cabinet member would be in a better position to facilitate this moving forward.

The FRS strongly supports the desire to secure sustainable funding mechanisms to reflect the more diverse role that the FRS could deliver against and would welcome these issues being addressed as a matter of urgency. However, this is likely to require Welsh Government adopting a separate pay and funding settlement (as per Scotland) to achieve this – these issues are currently outside of the control of the FRS and FRA. This is particularly the case in respect of Fire Medical Response, where the FRS would welcome any proposals to sustainably fund the additional costs that would fall to the

FRS in delivering against this (in line with relevant case law). It is noted however, that the proposals for reform put forward in the White Paper do not deal with these issues at all, as discussed later.

In relation to FRA numbers, the FRS does not hold a view on the appropriate number of members – the current legal constraints dictate a maximum of 24 members.

The Service strongly supports the wish to avoid any adverse changes to front line operations or resources. However, whilst extremely desirable and the right thing to do, it is the Service's opinion that this is not achievable through some of the solutions proposed in the White Paper – budget mechanisms that allow final decisions to be taken outside of the FRA legal entity could very likely cause changes (potentially significant changes) to front line service delivery and resources to the detriment of the communities we serve. They could also potentially impact upon firefighter safety, an area we have extreme issues with. They also raise some interesting legal responsibility and liability implications should levels of funding prove insufficient or result in adverse consequences identified at the time budgets were set.

Question 2: Are there other objectives that the reform programme should pursue?

Please see suggestions detailed in the response to Question 1 above. In addition, it is queried that if, as is mentioned, the cost of the Fire and Rescue Service is in issue, some simple efficiencies could be generated by strict compliance to the existing Combination Orders on the number of Fire & Rescue Authority Members.

Question 3: Do you agree that FRAs should remain as separate and distinct entities, with the same boundaries as now?

The statutory responsibilities under relevant legislation sits with the FRA. Unless there is an immediate desire to change the legislation, it is essential that FRAs remain a distinct legal entity.

The White Paper does appear to rule out the option of a consideration on the number and/or boundaries of the three FRAs in Wales. However, it was noted that when the paper was debated in plenary session on 13th November, in response to a question from Mike Hedges AM, the then Minister, Alun Davies AM appeared to bring the issue back in scope if arguments were persuasive.

There has been much debate over the years around the appropriate number and geographic boundaries for much of the public sector in Wales. This creates huge amounts of uncertainty and anxiety for the staff affected in these organisations and the communities they serve. This is therefore an issue that requires definitive clarification as a matter of urgency.

As was alluded to in many of the responses to the Local Government reform proposals, "bigger does not always mean better". Risk profiles are diverse and require local knowledge to ensure service delivery is planned effectively to meet a community's needs. In addition, whilst some may argue efficiencies may be generated, effective regional, national and UK working already exists. Indeed, the National Issues Committee and other collaborative forums we are party to have resulted in many key

areas of work being delivered on a national or larger regional basis without the cost and disruption of reorganisation. Examples include the shared control rooms of Mid and West Wales FRA, South Wales FRA and South Wales Police; a national procurement service for FRAs in Wales which also delivers national procurement of key assets, supplies and services; shared specialist operational teams (for example Urban Search and Rescue); national community safety campaigns delivered by lead FRAs; consistent procedures for fire safety and enforcement, enabling greater national resilience; national recruitment campaigns and recruitment processes for firefighter roles; tri service data hubs within South Wales; shared ICT software for people resources (including pay) between South Wales FRA and Mid and West Wales FRA; combined recruits training courses between Cambridgeshire FRS and South Wales FRS; and national leadership and development programmes for FRS leaders (the Pioneer Programme).

Question 4: Do you agree that transferring control of fire and rescue services to Police and Crime Commissioners or local authorities would not be appropriate?

It is agreed that transferring control of the FRS to PCCs would be inappropriate. Policing is not a devolved function within Wales and therefore having the Fire Service (a devolved function) controlled by a non-devolved body is inappropriate. It would also prove highly complex for South Wales, being spread over two police boundaries.

Where required, effective collaboration already exists with our police partners and the FRS would echo the view elaborated by the WG that such a move would be inappropriate.

Transfer of responsibility of control of the FRA to the PCC would also contradict one of the arguments set out in chapter one of the case for reform, where it was considered that there was less requirement for political involvement in FRAs. Such a move would put politics at the heart of the FRA.

It is also agreed that it would be inappropriate to transfer control of FRSs to local authorities. The FRSs and the FRAs in Wales currently operate well at a regional and often national level. Disaggregation of the FRS to 10 constituent LAs in South Wales would create a far less efficient and effective service. Overheads would be significantly increased, duplication would become common place and service delivery in different areas of South Wales could become a postcode lottery.

It would also prove highly ineffective in terms of resilience both locally and nationally. Fire risk modelling would prove inordinately complex as there would be no control over adjoining fire cover and during spate conditions, mutual aid could test local authority relationships to the extreme. Specialist vehicle and/or skills deployment could not work effectively on such a small scale and business continuity arrangements would prove costly at such a local level.

Where required, effective collaboration already takes place with our constituent LAs to promote better outcomes for our communities, which has been enhanced through our statutory seat on Public Service Boards. In addition, the national work that is undertaken between the three FRAs and FRSs in Wales (as detailed in the response

to question 3 above (final paragraph)) could also be compromised by such a large disaggregation from 3 governing bodies to 22.

Question 5: Do you agree that there are legitimate but limited national interests in the Service that need to be reflected in its governance arrangements?

It is correct that there are a variety of national and indeed international interests that need to be considered as part of any proposal for reform. Many specialist services are delivered through regions larger than the relevant FRS. These services are also part of a much bigger UK picture of national resilience and cannot be compromised. In addition, mutual aid arrangements take into account the bigger national picture. It should be noted however that these mutual aid arrangements may not be feasible for any new areas of work sought to be achieved through diversification of the role in Wales unless similar diversification and requisite training arrangements are in place in England.

Question 6: Do you agree that local authorities should continue to nominate FRA members?

It is agreed that maintaining local level leadership of FRAs in Wales is appropriate. Risk is peculiar to local areas and local need, and to remove leadership away from such roots would be inappropriate. This process of nomination also enhances the local connections the FRAs and FRSs have with the local communities that they serve, leading to enhanced understanding of need and local issues, resulting in improved service delivery.

Question 7: Do you agree that local authorities should nominate one FRA member each, drawn from their cabinets?

Whilst not wanting to get into the intricacies over ultimate governance structures, if it is proposed that the current funding mechanisms would remain save for the Minister's ability to take a final decision on budget, it is questioned whether it would be fair and equitable for one authority (for example Cardiff), that currently pays just over 1/5 of the total FRS budget, to only have 1/10 of the voting influence on such decisions.

It is also questioned why the member needs to be drawn from a LA cabinet, as it is not considered that such a position would facilitate greater collaboration given the mechanisms already in place for key partners, many of whom sit outside of the LAs; most notably a statutory seat at Public Service Boards, Community Safety Partnerships, Local Resilience Forums, the Joint Emergency Services Group, National Fire Chiefs Council and relevant committees, National Issues Committee, Tri Service Intelligence Hub and various voluntary and third sector partnership meetings such as the Princes Trust . Drawing membership from cabinet members would also not guarantee any greater level of competency of member as already described in the response given to question 1 above.

It is considered, taking into account the comments of the Independent Remuneration Panel that it would not be possible to appoint from within the existing LA cabinet member cohort, as it is noted that they are salaried based on a 40 hour week. The Panel received considerable evidence that cabinet members were struggling already

to cope with existing workloads. Adding an additional reference to an existing cabinet member would likely mean that attendance could be detrimentally affected at the number of meetings required and the time members could devote to the role and requisite training would be compromised, resulting in a lesser degree of leadership and scrutiny.

Therefore, if additional cabinet members were required to be appointed, such an approach would immediately (and significantly) contradict one of the arguments for reform detailed in chapter 1, by costing the public purse considerably more.

The current costs of FRA salaries (excluding travel) in South Wales is £62,520 (using 2019/20 costs contained within the Independent Remuneration Panel 2018 Report as base). If the FRA were changed to just 10 LA executive members, in the first place there would need to be an assessment of the appropriate banding in serving a population of approximately 1.6m. Even using the existing banding schedules detailed by the Independent Remuneration Panel, the costs for 10 members would be around £288,000 (based on Band C – up to 100,000 population) and £352,000 (based on Band A – up to 200,000 population). These costs assume one chairperson and nine other executive members. Added to this would then be the costs of any non-executive positions proposed.

This would be a substantial increase in the cost of running the FRA; greater than the costs of keeping one on-call fire and rescue station open each year. Given the annual budgets of each of the FRSs in Wales, and the assertion within the White Paper that any new governance structure should reflect the fact that fire only accounts for 1% of public spend, this would appear to be wholly disproportionate when compared to other public sector bodies.

In addition, if it was proposed that such additional Cabinet salaries should be funded from within the Local Authorities' budgets, it should be noted that several Councils have already reduced their Cabinet size purely to achieve financial savings. As highlighted above, the financial costs of the existing structures only amount to £62,500.

It is also considered that the appointment of a cabinet member would not necessarily add anything to the ability of the member to scrutinise. Indeed, it could be argued that “backbench” councillors are provided with considerable training on effective scrutiny and are therefore in a better position to undertake this role. Further, there is a greater diversity amongst “backbench” councillors, thereby ensuring that scrutiny is more comprehensive (please also see the response to question 21 below in relation to diversity which is applicable here also).

Indeed, the Welsh Government's recent Green Paper Consultation on “Strengthening Local Government: Delivering for People” issued the same year has a whole section of the report dedicated to valuing councillors and the “opportunity to recognise the huge commitment and professionalism of local elected representatives.” It goes on to acknowledge that “committed councillors are at the heart of local democracy and local communities” and that WG “want councillors to fully reflect our communities and be representative of the diversity of experience, interest and priorities in those communities. The WG believes we should recognise the commitment involved in being

a councillor and ensure they are properly remunerated, respected and recognised for the work they do in their communities. Equally, it will mean providing councillors with the support and resources necessary to undertake their role....Elected members, whether or not they are part of the executive should be at the heart of the Authority.”

Appointing from the cabinet would also change the political make-up of the FRA, as the cabinet members would come from the ruling group in each Local Authority. This could detract from the more diverse political representation that currently exists, where FRA Members are broadly representative of the political balance of the area. In addition, it could detract from effective scrutiny as the broad range of views currently harnessed through the existing system would be lost.

Question 8: Do you believe any changes are needed to the law on the size and remuneration of council cabinets, to allow their members also to serve on FRAs?

This is a matter for WG, but it is noted that in the most recent draft of the IRP report for 2019/20, the IRP again concluded that the executive members should be considered as working the equivalent of full time (up to 40 hours per week) but not necessarily 9am-5pm. However, they go on to say that discussions with members and officers have indicated that executive member workloads have increased. In the light of this it would therefore be essential to ensure there was an adequate time commitment to allow them to effectively discharge the role.

The cost implications of this, as detailed within the response to question 7 should not be underestimated, as this would result in significant additional costs being imposed on respective constituent authorities.

Question 9: Do you agree that FRAs should also have non-executive members?

It is not considered that there is necessarily a need, although as an FRS we would commit to working effectively with whatever governance arrangements were in place. In our experience, in the majority of public sector bodies in Wales, the member's role is to provide the strategic leadership and direction, scrutiny, governance and overview. They are assisted by professionally qualified officers who are there to provide specialist advice as and when required. Many of our current FRA members have extensive experience in a wide field of disciplines. Presently, we have ex-cabinet members, many chairs of scrutiny and other committees, many business leaders, an ICT specialist, several lawyers, members with trade union experience and members from other professional disciplines. There is also no limitation on the current FRAs to co-opt a member in for a specific issue or obtain external specialist advice if none is available through officers.

This is a system that works well in both local authorities, Welsh Government and the UK Parliament. Indeed, there have been several instances where specialist advice has been sought and received by the FRA from people or bodies outside of the FRS when required. In addition, the FRS provides all of its constituent councils with copies of all FRA and Committee reports for them to review the work of the FRA and the FRS has on many an occasion undertaken presentations and been subject to scrutiny on performance, budget setting and key policy decisions where appropriate. This has

occurred both through the FRS requesting such an opportunity and requests received from LAs and Community Councils. This is a situation that should remain and continue.

There is some concern over the cost implications of appointing independent members, as this would appear to increase the cost of any new FRA further, when cost and numbers of members were part of the rationale for reform initially.

Question 10: Who should appoint non-executive members of FRAs?

It is suggested that if this option were to be pursued (given the response in question 9 above), it would be the FRA that would have the detailed knowledge of any specialist skills gaps that may exist on the Authority. It is considered that Welsh Government would not be privy to such detailed information and therefore it would be wholly inappropriate for them to appoint.

There would be an issue with the term of such appointment which would need to be resolved. As previously highlighted, LAs can change their nomination to the FRA at any time and for any reason, including dissatisfaction with the current governance and policy direction of the FRA; a change in political balance at the home LA; the need for the member to exercise other functions at their home LA which would not be compatible with them continuing their FRA role – are just a few examples. Therefore, by consequence, any skills gap in the FRA could change quite regularly, potentially requiring a change in non-executive membership skills.

Finally, it is questioned to whom would such non-executive members be accountable? If democratically elected councillors are considered unaccountable, then appointees would appear to be even less accountable, thereby not addressing this area of concern highlighted within the case for reform. Clarification is therefore sought as it is assumed that they would be accountable to the FRA itself.

Question 11: Do you agree that, in the longer term, responsibility for the service should vest in a statutory Chief Fire Officer, with FRAs fulfilling a scrutiny and oversight role? If so, would that require any change to membership arrangements?

This proposal is strongly opposed. In all other comparable devolved public sectors, it is the Authority/Board/Government that has the statutory responsibility to deliver and/or plan, to agree budgets and to ensure sufficient challenge and scrutiny. The implementation of such decisions is then delivered through officers. Serious concerns are raised about vesting all of the powers and responsibility for delivery in one individual, especially if they do not also have control over the budget they require to discharge their statutory requirements.

This remains the case for Councils, where responsibility for provision of services rests with the Council and final budget determinations are also made by them through their ability to increase their funding levels through local taxation. It is queried why Welsh Government is seeking to change this tried and tested method of administration for what is a very small proportion of the Welsh Public Sector.

Any move to create a single statutory officer who retains all of the responsibility for service provision means that the arguments for reform in chapter one of the White Paper are being contradicted. Officers are appointed on permanent contracts and have no accountability to the electorate. Whilst they would be subject to scrutiny by an FRA, their removal from post could only be secured for reasons set out in employment legislation. This would result in less accountability than currently exists with the current FRA governance, where LAs and/or the electorate can remove the member from office.

Question 12: Do you have any other proposals for how to reform FRA governance which meet the criteria in Chapters 1 and 2?

This Service considers that the case for reform in relation to governance is not clear and contains several contradictions. It would therefore be inappropriate to propose solutions without a full understanding of the outcomes sought to be achieved. The FRS would of course be willing to engage if clear rationale of the reasons for change could be detailed.

Question 13: Do you agree that FRAs and local authorities should agree the level of FRA funding each year, with a reserve arbitration power for the Welsh Ministers?

South Wales FRA takes its budget setting powers and process very seriously, undertaking extensive scrutiny through both its scrutiny group and its Finance Committee and formal consultation with each of our constituent LAs to ensure proposed budgets are appropriate. It is pleasing to note therefore, following such a detailed process, that the White Paper acknowledges that such powers have been exercised responsibly. As such, it is therefore questioned why any reform proposals are required.

Every year the FRA consults with all of its constituent authorities and reports the responses it receives in full to the FRA. Indeed, until relatively recently, we attempted to undertake budget consultation meetings with our constituent councils which were more often than not poorly attended. This was partly because of the information provided by the FRA Treasurer during the budget formulation process, rather than waiting until a consultation budget had been set by the FRA. The proposals are therefore strongly opposed for several reasons.

In the first instance, the position of the Minister determining the FRA budget if agreement cannot be reached (rather than arbitrating as stated in the question – report para 4.6) results in the position where there is absolutely no incentive for individual local authorities to agree. It is stated that the Minister would not determine a figure any higher than the budget requested but could set one lower. Authorities would have nothing to lose in exercising this default position and everything to gain.

Given the legal timelines for FRA and LA budget setting, the Minister would be faced with making a determination within a few weeks in order to meet LA budget setting deadlines. This is considered insufficient time to fully understand the detail of the proposed budget and the parties' arguments with respect to this (up to 11 parties – 10 LAs and 1 FRA). It is noted that no appeal mechanism is proposed.

This scenario could also raise the potential of future less scrupulous FRAs detailing a budget for discussion in excess of requirements to ensure that they ultimately received a budget in line with what they actually required to deliver the service.

Another reason for such strong opposition is that the default power would result in the position of a Minister determining the budget for a service which they have no statutory responsibility to deliver. What would happen if the FRA overspent as a consequence of being awarded a budget less than that required to deliver the service? Would Welsh Government meet the overspend as they do for health or would LAs be expected to fund this nearing year end when they would likely be struggling themselves financially?

Additionally, who would be responsible if there was a service delivery failure specifically attributable to a budget reduction determined by a Minister? This does become a real possibility given the specific breakdown of an FRA budget. Over 80% of all costs are staff costs. Of the remaining 20%, many are fixed costs such as capital charges, rates, fuel, appliances and vehicles, personal protective equipment, insurance etc. Therefore, any budget reductions are more than likely going to impact upon staff numbers (especially given budget settlement timelines) and ultimately front-line service delivery.

The proposals also do not appear to address one of Welsh Government's stated concerns in relation to health work being subsidised by LAs. These proposals make no mention of funding coming anywhere other than from LAs. It is suggested that if the diversification of the role of the firefighter is to be seriously pursued (as supported by the FRA & FRS), then securing the additional funding from within health budgets would seem wholly appropriate and needs to be addressed. This is especially so given recent reports that highlight that for every £1 invested in the FRS in elements of health work, it would save the health budget £4. This key benefit and argument for reform of budgets is left unaddressed in the proposals and does nothing to aid sustainability.

The proposals do not promote the principles of the Wellbeing of Future Generations Act and the move to longer term planning and considerations. FRAs and FRSs would have little or no control over their annual budgets and this would render longer term financial planning almost impossible. Indeed, their position could be worsened by an extension to the existing procedure by the addition of the fallback position for the Minister. This could mean very late determination of budget levels, impacting upon the FRS's ability to plan appropriately.

Finally, another area of concern expressed in the White Paper is that the local authority members are not directly accountable to their electorate or their home authority. The proposals outlined do not appear to increase this accountability for budget or performance. As LA appointed members, they remain only appointed to the FRA by virtue of their LA membership.

To resolve this and several other issues, the FRS would suggest maintenance of the current position until legislation can be introduced at the earliest opportunity to allow FRAs in Wales to precept. This would then address all issues concerned with transparency, openness, scrutiny and accountability in one measure. FRAs would be required to publicly detail to the electorate how the budget was arrived at and what the

community receives as a consequence. Welsh Government would also gain a level of external control through capping provisions in the same way that LA capping is exercised.

It is not accepted that precepting by FRAs would prove a burden, challenge or significant cost. LA systems already exist for billing council tax on behalf of multiple precepting authorities (community councils and the PCC). Save for the appropriate notifications of council tax bases and precepts and any minor amendments to ICT systems and bills, the FRS believes that the addition of a further precept mirroring arrangements already in place should not prove complex at all.

The White Paper suggests that the process of moving to an FRA precept would be practically difficult because any increase in council tax arising from an FRA precept may not be offset due to a refusal by LAs to implement commensurate and proportional reductions in their bills. This implies that LA budget decisions are at best self-serving. If this is the measure of the trust in the financial governance and decision making within LAs, the FRS would be rightly concerned with any suggestion that LAs are best placed to play a balanced role in determining FRA budgets.

Question 14: Do you agree that, in the longer term, FRAs should have powers to set a council tax precept, with the balance of their funding from Welsh Government grants?

For the reasons detailed within question 13 above, the FRS considers that should change be required, the only sensible and pragmatic way forward would be to progress straight to FRA precepting. This is the only method that addresses all of the areas of concern detailed with the white paper. It is open, transparent and provides clear accountability back to the citizen.

It is considered that the retention of grants for the current areas of award and any further new duties or national initiatives / contracts placed upon the FRA should continue.

Question 15: Do you have any other proposals for how to reform FRA funding which meet the criteria in Chapters 1 and 2?

Please refer to the response at questions 13 and 14

Question 16: Do you agree that the performance management system for FRAs should be grounded in the National Framework for Fire and Rescue Services?

It is agreed that the current performance management arrangements require reform as currently some of the key measures of success of performance are actually measuring other devolved body performance and measuring the wrong thing.

The FRS would support the removal of the Local Government Measure requirements for the FRAs, as these only serve to confuse and complicate reporting processes. The FRS believe that any new system should be grounded in not just the National Framework for Wales, but also the legislative requirements placed upon the FRA.

The metrics utilised need to be more meaningful in terms of outcomes to the community and what the information collected / measured is being used for. For example, the current measure of fires confined to room of origin supports improved performance if the fire is contained to the room, regardless of the outcome for the individual. It cannot be right that an indicator is perceived to be good performance if fires are contained, yet the individual dies or is injured.

Metrics should be developed that influence behaviours and enhance the safety of the community and our firefighters. The FRS supports that this may include metrics that require considerably greater qualitative information than quantitative information and have no opposition to the inclusion of the National Framework in performance metrics.

However, the FRS does consider that the proposals have missed an opportunity to join up the performance reporting of devolved functions in a more effective way to encourage changed behaviours and create efficiencies. For example, the current metric around the number of AFAs attended (false alarms) measures the number of incidents the FRS attends. This is actually a measure of how property owners are managing their alarm systems. It is common knowledge, supported by data, that health and education are the two primary offenders for AFAs yet there is no proposal to join up performance management across devolved sectors to encourage more effective and efficient service delivery, both for the FRS and FRA and the other functions who lose considerable down time due to these occurrences.

Question 17: Do you agree with the need for such a system to give FRAs flexibility on planning and reporting cycles, and on the sources of information about performance that they use?

This is agreed. The current systems are not joined up and have become inordinately bureaucratic for no apparent reason. It is necessary for all planning and reporting cycles to be aligned, not only just in relation to performance, but also for other legislative areas where plans and update reports are required (for example, Wellbeing and Future Generations objectives and reporting; Equality Plans; Environment Act 2016 plans etc).

Question 18: Do you agree that the Welsh Ministers should retain their duty to report to the Assembly about delivery of the Framework, and their powers of intervention?

It is accepted that the Minister should retain responsibility for Fire and therefore it is a matter for WG on their own internal reporting processes. However, it is suggested that the Minister's Independent Fire and Rescue Advisor would have an instrumental role in reporting to and advising the Minister in this regard, through their role in working closely with the FRS. The FRS would also support the formalisation of appropriate procedures to ensure FRAs and FRSs report in on delivery of the Framework, as in recent years, such report has been prepared with little or no reporting on progress by these bodies to WG officials.

It would also be appropriate for arrangements to be put in place were the Minister to retain and exercise default powers to determine an FRA budget. This is especially important if budget reductions were imposed that could, in the opinion of the FRA or

FRS ultimately impact upon resources available to deliver against the Framework priorities or service delivery to the public. The situation could arise that this could result in a conflict of interest for the Minister should budget reductions be the FRA's / FRS's rationale for failure.

Question 19: We would like to know your views on the effects that the policy proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

It is considered the proposals are not likely to hinder or promote the ability of the community to use the Welsh language, as the same Welsh Language Standards would be in operation. They do however have the potential for a reduced percentage of Welsh speakers to be members of the FRA.

Question 20: Please also explain how you believe the policy proposals could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

By reducing the number of proposed FRA members, there is the potential that the number of Welsh speakers on the FRA is also reduced, potentially disproportionately. For all of the reasons already outlined in the responses to earlier questions, it is not considered that reducing the number of FRA members is the correct solution to the perceived concerns with the FRA. Retaining numbers would reduce this risk. The FRS would strongly advocate that this issue needs to be considered in any review of performance frameworks.

Question 21: We have asked a number of specific questions about FRA governance, finance and performance management. If you have any related issues which we have not specifically addressed, please use this space to report them: Please enter here:

It is considered that some of the equality impacts of the proposals have not been fully explored in the Integrated Impact Assessment undertaken alongside the White Paper. For example, whilst it is accepted that the impact of the proposals has to a very limited extent been considered, this assessment has not been extended to consider how the proposals could impact upon protected characteristics of the FRA.

Whilst it is accepted that FRA members are nominated by their constituent LA and the Authority has no control over this, historically there has been a positive balance in relation to protected characteristics. The FRA at present is probably far more representative of the community than many cabinets. There are currently more males than females on the Authority (75%/25% split), but of the 24 members, 12.5% come from ethnic minority backgrounds, compared to approximately 2% in our ten constituent Councils and we have an extremely fair balance of age ranges on the Authority, with a substantial proportion of members under 40, many of those being

under 25. However, the average composition of Cabinets within South Wales is predominantly older. We also have a number of members with other protected characteristics.

This means that the FRA currently has a diverse composition, meaning that decision making and scrutiny takes a balanced approach, taking into account the views of those from diverse backgrounds. Unfortunately, were this to change to one cabinet member per Authority, this could result in a significantly higher proportion of older white males, thereby diluting the rich range of views and experiences we currently have.

In addition, it is the FRS's view that the assessments in relation to the potential impacts of the proposal upon FRS is also not correct. Any proposals to remove final budget determination from the corporate body that employs staff mean that an impact upon them cannot be ruled out. As previously mentioned, 80% of FRA budgets are staff related, with the vast majority of the remainder being fixed costs outside of the FRA control. Therefore, if a Minister determines a lower budget settlement than that required to deliver the service in the FRA opinion, this will ultimately have a direct impact on staff numbers and has the potential to detrimentally affect certain groups with protected characteristics.

Additionally, if budgets were reduced from that requested, the ultimate consequence could be a reduction in service delivery to the communities we serve, thereby potentially adversely affecting more vulnerable sections of the community who are in need of our services most. It may also have a detrimental impact upon the business community

It is considered that the wellbeing assessment is also incorrect. Any proposal that would take budget setting outside of the control of the body responsible for the delivery of those services means that longer term budget and resource planning becomes almost impossible. This could ultimately mean that shorter term planning has to be undertaken out of necessity.

A further consequence of this could be a detrimental impact from the requirements under the Integrated Impact Assessment to support sustainable management of natural resources. Secure stable employment may not be possible due to lack of control of budgets. Short term temporary contracts may become more heavily relied upon in key areas of the FRS to enable swift changes to employment numbers to be made should the budgets required not be forthcoming.

It is also noted that within the Integrated Impact Assessment, reference is made to a recent study suggesting that "for every £1 invested in fire services response to medical emergencies on behalf of the NHS, £4 saving to the NHS was realised". It is also noted that this was one of the arguments for reform within the White Paper. However, it is the FRS's opinion that the interim funding model proposed with default power to the Minister does nothing to address this issue in any way, in fact it could be argued, as in the case for reform in chapter one, that under the proposal, LAs would continue to subsidise such services. As already discussed, the only way to positively meet this challenge, contrary to the Integrated Impact Assessment assertions is to move directly to precepting.

The FRS also strongly disagrees with the assertion in the Integrated Impact Assessment that it is the existing governance and funding arrangements that prevent this work being commenced and that the proposals for reform would resolve this. This is not the case. Both the FRA and FRS have on numerous occasions expounded their desire to undertake such work. The only issue preventing this is resolution of the pay dispute to determine the additional remuneration required for this work. The proposals do not address this issue, as the status quo would remain. The Integrated Impact Assessment is therefore wrong in this regard.

In summary to the FRS response, it is pertinent to briefly review the case for reform detailed in chapter one to the White Paper and summarise the FRS's response to the proposals to address this:

Governance:

- Numbers & Cost
 - Reducing to 10 cabinet members would increase current costs to approximately £280,000
 - There would be additional costs for non-executive members
 - Reducing to 10 members would result in less diverse membership and too wide a representative role of the unitary area
 - Quorum could be an issue with such limited representation, especially where conflicts of interest may arise
- Accountability & Scrutiny
 - Cabinet Members are accountable to the electorate in exactly the same manner as “backbench” councillors, so the current position relating to accountability would not change
 - The proposals ignore the current accountability mechanism of LAs being able to change FRA membership at any time
 - Scrutiny by a more diverse membership as the FRA currently has is preferable to ensure balanced and reasoned decision making
- Membership
 - Insisting on cabinet members would not guarantee any more effective leadership of the FRA
 - Insisting on cabinet member appointments would result in less diversity on the FRA
 - The ability of cabinet members to devote the time to FRA work is questioned given LA representations received by the FRS in this regard and the content of the Independent Remuneration Panel report
- Innovation & Change
 - Insisting on cabinet members would not promote greater collaboration or innovation in the FRA due to the current extensive mechanisms already in place

Funding:

- External Control
 - The short term funding proposals would inevitably lead to behaviours that discourage agreement of budgets

- The short term proposals would result in funding decisions being taken by a single individual who has no statutory responsibility to deliver the service
- The short term proposals do not assist in longer term budget planning or meet wellbeing objectives
- The longer term proposal of making FRAs precepting is the only truly accountable, transparent and sustainable method of funding explored and should be pursued as the only viable option in any programme of change
- Value for Money
 - The consultation ignores the statutory value for money audits undertaken by the Wales Audit Office and the challenges to both policy and funding decisions they make where appropriate
- NHS Subsidy
 - The proposals do not address the perceived “LA subsidy” of NHS work
 - The proposals do not advance the ability of FRAs or FRSs to diversify the role of the firefighter

Performance Management:

- Local Government measure
 - The FRS supports the repeal of the LG Measure requirements on FRAs
- National Framework
 - The proposal to ground FRS performance in the National Framework is supported, but there should also be inclusion of the vast array of other statutory requirements placed upon the FRA
- Operating Context
 - The FRS support the ability to have more meaningful performance measures, involving both qualitative and quantitative data
 - The FRS considers that the proposals on performance management do however continue the silo mentality of performance management for devolved sectors, rather than embracing an opportunity to review the interactions of devolved functions and how aligned performance metrics may result in improved service delivery to the public and greater efficiency in the use of the Welsh pound.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: