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Welsh Government
Consultation – summary of response

Consultation on the draft National Framework for Fire and Rescue Services

March 2026

Overview

This document provides a summary of the responses to the consultation on the proposed National Framework for Fire and Rescue Services for Wales which will have effect from March 2026.

Action Required

This document is for information only.

Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

Contact details

For further information:

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Additional copies

This summary of response and copies of all the consultation documentation are published in electronic form only and can be accessed on the Welsh Government's website.

Link to the consultation documentation: [Consultation on the draft National Framework for Fire and Rescue Services \[HTML\] | GOV.WALES](#)

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The contact details for the Information Commissioner's Office are:
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Mae'r ddogfen hon ar gael yn Gymraeg hefyd / This document is also available in Welsh
Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg / We welcome correspondence and telephone calls in Welsh

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Introduction

1. The Welsh Government's consultation on a new National Framework for Fire and Rescue Services was published on 22 October 2025.
2. Section 21 of the Fire and Rescue Services Act 2004 (the 2004 Act) requires the Welsh Ministers to prepare a National Framework to "set out priorities and objectives for fire and rescue authorities in connection with the discharge of their functions" and also allows for the Framework to contain guidance for Fire and Rescue Authorities (FRAs) in connection with the discharge of their functions. The last such Framework was published in 2016, and while it has stood the test of time well, there have been several very significant developments affecting fire and rescue services since then (such as the Grenfell Tower fire and the unstable global security situation) which make it necessary to publish a replacement.
3. The consultation included a complete draft of a revised Framework and invited views on its contents. In outline, the draft stated that:
 - There have been several very significant changes to the strategic context in which Fire and Rescue Services (FRSs) operate, and in the levels and types of risk they might need to deal with. That situation is likely to persist, and further new risks are likely to emerge.
 - Accordingly, FRSs should thoroughly reappraise the current and likely future risks in their areas, and adapt their levels of capacity and capability, and the distribution of them across their areas, in light of that. They should also be prepared to act swiftly and flexibly in response to emerging risks.
 - The culture, leadership and management of the FRS should continue to improve, both as an end in itself and to equip the Service better to deal with the changing strategic risk content.
 - The corporate governance of Fire and Rescue Authorities (FRAs) should also adapt to meet this changing context, and to secure wider objectives such as net zero.

Consultation Process

4. Section 21(5) of the 2004 Act requires the Welsh Ministers to consult the FRAs or persons considered by the Welsh Ministers to represent them, persons considered by Welsh Ministers to represent FRA employees and may consult any other persons they consider appropriate before making revisions to the Framework which appears to them to be significant.
5. The Welsh Government's Social Partnership Forum for Fire and Rescue Services (which includes all three FRAs, all eight recognised unions and the WLGA) discussed an outline of the Framework in July 2025, and there were further bilateral

discussions about the outline between Welsh Government officials and certain Forum members at the latter's request. Following that, an eight-week consultation began on 22 October 2025 and was open for responses until 17 December 2025. The consultation contained 11 questions, with options to respond to those questions by completion of an online form or by e-mail. The [consultation document](#) was available on the Welsh Government website.

6. The Welsh Government received 20 responses to the consultation. Those responses came from the following:

- Five from FRSs and other bodies in the fire sector
- Two from trade unions representing firefighters
- Two from local government bodies
- One from the Equality and Human Rights Commission
- Three from voluntary and private sector bodies
- Seven from individuals, several of whom appeared to be serving or former firefighters.

There was a further response which was wholly blank and unattributable. It has not been taken into account any further.

7. A full list of respondents is available at Annex A.

8. The Welsh Government welcomes the responses to the consultation and would like to thank those who responded.

9. The Welsh Government published its Integrated Impact Assessment alongside the consultation document. The overall policy position set out in the consultation document remains the same and has formed the basis of the final text of the Framework. Therefore, no changes have been made to the Integrated Impact Assessment as originally published. The document can be found here [Draft National Framework for Fire and Rescue Services: integrated impact assessment \[HTML\] | GOV.WALES](#)

Summary of Consultation Responses

10. The Welsh Government has considered the responses to the consultation. This document provides a summary of the responses received to each of the specific questions and the Welsh Government's response to them.

11. For the most part, this summary is based on the questions which the consultation document posed. However, two responses did not always fall neatly into that structure. One, from an individual, focused on a critique of the Integrated Impact Assessment rather than the Framework; and the second, from an FRS, advocated a much greater degree of prescription in the Framework, for instance about particular operational or managerial processes. Our broad response to those views is as follows.

12. The Integrated Impact Assessment is not part of the Framework, and the Welsh Government believes that the Assessment published alongside the draft revised Framework is fair and comprehensive. In particular, it is (and must be) an assessment of the impact of the Framework coming into force, not an assessment of the impact of fire and rescue services more generally, as this respondent appeared to believe. We therefore do not agree with the criticisms that this respondent made.

13. As noted above, the main purpose of the Framework is to set objectives for FRAs. How those objectives are pursued is a matter for each FRA, having regard to local priorities and risks, current and likely future levels of resource, and established management and operational policies and processes and the scope for reforming them. It would be neither possible nor appropriate for the Framework to attempt to limit or direct those decisions.

14. Several respondents also argued that the Framework should detail other statutory duties to which FRAs are subject, such as those relating to health and safety at work, equalities or the Welsh language. Again, though, that would be to exceed the Framework's scope and purpose, and would involve inserting a considerable amount of extra text for little gain. These duties bind FRAs in law anyway; by contrast the Framework is only guidance to which FRAs must "have regard" in carrying out their functions. Statements in the Framework to the effect that FRAs should "have regard" to complying with the law would add little. However, where such duties bear directly on objectives which the Framework stipulates, we will amend the text to include references to them.

Q1. Do you agree that the account of the strategic challenges facing the Service is fair and comprehensive?

15. All 20 respondents answered this question, and none believed that the account of the strategic challenges in the draft Framework was not fair and comprehensive. 12 of the 20 believed that other issues should also be mentioned, and/or existing issues should be covered in more detail; that is explored further under question 2 below.

Welsh Government Response:

16. We are pleased that this chapter of the draft Framework attracted a high level of support, at least in principle. It will form the basis of the final text, subject to the changes we describe under the next heading.

Q2. Are there other issues that we should include in this chapter?

17. Of the 20 respondents, 15 called for other issues to be covered, two felt there were no such issues, and three did not answer this question. 12 respondents also called for other issues to be covered in their answer to question 1.

18. Ten respondents argued that this chapter should refer to internal challenges facing FRs, such as cultural and leadership improvement, staff retention and firefighter health and safety.

19. Other suggestions included the long-term effects of the COVID-19 pandemic; socio-economic inequality, obesity, road safety (including driverless vehicles) and issues of product safety which might increase the risk of dwelling fires. One response argued that the Framework should contain a detailed account of all such strategic risks and their propensity to change.

Welsh Government Response:

20. We agree that there are some very significant internal challenges facing FRSs. The pressing need to confront dysfunctional and discriminatory cultures, for instance, has been exposed in multiple media reports and subsequent inquiries. However, this chapter focuses on past, current and likely future changes in the external strategic context within which the Service has to operate, and to which it must adapt. A vital part of that adaptability will be making the sorts of internal improvements that these respondents called for. These are, though, covered in the third chapter of the Framework, and there is no need to repeat them in detail here. We will include in this chapter a line noting the importance of these issues, and signposting the reader to the third chapter.

21. Some of the other risks which respondents wished to see included, such as the after-effects of the COVID-19 pandemic and product safety, are in fact already covered in the draft Framework. Others, such as obesity, are likely to have only a marginal effect on FRS operations.

22. As the draft noted, it is beyond the scope of the Framework to explain in depth all the current and likely future changes to strategic risk which the FRS might have to confront. A detailed account of, say, changes to the built environment, and their likely effects on fire risk and firefighting, would be a very substantial piece of work. Furthermore, several of these risks are dynamic and rapidly evolving, meaning any such account would quickly become dated. The main purpose of this chapter was to make just that point, to illustrate it by outlining some of the more important and obvious changes in risk, and to urge FRSs to adapt to a shifting and in many ways more dangerous strategic risk context in general. We will amend the text to clarify that.

23. However, we agree that this chapter could usefully mention current and likely medium-term economic pressures, including on public finances in particular. Such pressures are likely to limit the capacity for FRSs to take some of the actions which might otherwise be desirable in pursuit of the objectives which the Framework stipulates. We will amend the text accordingly.

Q3. Do you think that the narrative and objectives in the Resourcing to Risk chapter are appropriate and important?

24. All 20 respondents answered this question, 13 of whom agreed with the content of the chapter. A further 7 also agreed but felt that other issues should be included.

25. 9 respondents argued that this chapter should also make reference to resourcing, in particular the need to ensure there is adequate staffing levels and

crewing arrangements and also the importance of maintaining resilience and equitable service provisions across both rural and urban areas.

26. Other comments included reference to emergency medical response and training required to undertake this role. In addition, 2 respondents argued that the chapter should include reference to equalities, in particular a greater understanding of the population served and workforce equality policies.

Welsh Government Response:

27. We are pleased that this chapter of the draft Framework attracted a high level of support, at least in principle. It will form the basis of the final text, subject to the changes we describe under the next heading. Our response to proposals to cover other issues is under the question below.

Q4. Are there other issues that we should include in this chapter?

28. Of the 20 respondents, 17 called for further issues to be addressed in the chapter, 3 respondents did not respond to the question. Some also called for other issues to be included in their responses to question 3.

29. 13 respondents argued that this chapter should refer to internal issues, in particular, the role and retention of the retained duty firefighters, community risk profiling, reporting on performance indicators, cultural issues and data and digital capability.

30. 10 respondents also felt that operational issues such as broadening the role of firefighters and the need for greater collaboration with other sectors should be included within the Framework. Further comments were made in respect of resourcing and the importance of a full consultation and assessment when considering reduction in response standards. In addition, 2 respondents felt that more action should be taken to promote the importance of water and road safety and that there should be targeted home safety interventions for high-risk households, including older people. One respondent disputed that marauding terrorist attacks (MTAs) should be treated in the same way as any other mass casualty incident and called for the Welsh Government to revisit this decision. One respondent supported continued research into firefighting tactics.

Welsh Government Response:

31. Several of the issues which respondents called for are in fact already covered in the draft Framework. These include the need to ensure adequate capacity to respond to likely demand, the sustainability of the retained duty system and services in rural areas and targeting home safety interventions on those at greatest risk. Furthermore, cultural issues are covered in chapter 3 and performance reporting in chapter 4. We do not believe any further amendments are necessary to deal with these issues.

32. The draft also already addresses the possibility of broadening the role of the Service, and notes that the current Welsh Government's position is to prioritise

improvements to culture and governance ahead of any such changes. While respondents are of course free to take issue with that stance, which might change following the 2026 Senedd elections, it remains the case for now. So it would not be appropriate to amend the Framework to advocate such a broader role.

33. The approach to responding to marauding terrorist attacks which the Framework describes was discussed at length and agreed by the National Resilience Governance Group in 2023. That Group is chaired by the Chief Fire and Rescue Advisor and Inspector and includes senior representation from all three FRSs. Its decision to mainstream MTA response is now being implemented, and we do not agree with the single respondent who effectively called for it to be reversed.

34. However, we agree with respondents that this chapter could and should say more about analysis of data and use of ICT; about sustainable resourcing of capacity; and about understanding equalities issues and protected characteristics as an element of risk planning. We will amend the text of the Framework accordingly.

Q5. Do you think that the narrative and objectives in the People, Leadership and Culture chapter are appropriate and important?

35. 18 respondents answered this question, 12 of which agreed with the content of the chapter. A further 7 felt that further issues should be included.

36. 3 respondents argued that this chapter should refer to the health and safety of firefighters, in particular, the risks relating to carcinogens and mental health. 3 respondents suggested that the chapter should also refer to equalities, such as ensuring that there are clear targets in place for improving workplace culture and diversity, and that protected characteristics other than age should be considered. In addition, it was suggested that leadership development should also include operational credibility as well as management qualifications.

37. One respondent also made a comment that they felt that the chapter was over generalising by referring to leadership culture rather than culture in general.

Welsh Government Response:

38. Again, we are pleased that this chapter of the draft Framework attracted a high level of support, at least in principle. It will form the basis of the final text, subject to the changes we describe under the next heading. Our response to proposals to cover other issues is under the question below.

Q6. Are there other issues that we should include in this chapter?

39. Of the 20 respondents, 14 called for other issues to be covered, two felt there were no such issues, and four did not answer this question. Some also called for other issues to be covered in their responses to question 5.

40. 6 respondents argued that staffing issues should be included in the Framework, in particular the need for better organisational learning and utilisation of support staff to reduce administrative burden at managerial level. Staffing issues

could be improved by ensuring that there is clarity on career progression pathways and fairness in promotion processes. Two respondents felt that reference to diversifying the workforce should be more detailed and clearer targets and accountability would be beneficial. Respondents also suggested that reference to equality duties should be included within the chapter and further emphasis should be given to the need for social partnership with representative bodies.

41. 2 respondents suggested that reference to governance should be included within the chapter, with emphasis on the importance of scrutiny and the consequences of failure. In addition, it was felt that the Framework should reflect the issues identified by staff and their role in shaping policy development.

42. 6 respondents argued that the chapter should also include cultural issues, including the need for a shared understanding of positive culture and a shared leadership model. In addition, one respondent also suggested that health, safety, and wellbeing considerations could be broadened to include UK-wide and international perspectives, ensuring best practice is shared and adopted.

43. In addition, 3 respondents suggested that the Framework should make reference to health and safety, in particular, the mental health of firefighters, the importance of physical fitness and the requirement on the Fire and Rescue Services to provide both facilities and paid time to maintain physical fitness standards of both wholetime and retained duty firefighters. In addition, 2 respondents felt that the Framework should refer to health risks such as contaminants and fatigue, and the need to re-evaluate traditional operational tactics.

Welsh Government Response:

44. As with chapter 2, some of the issues which respondents called for are in fact already covered in the draft Framework. These include the risks arising from fatigue and exposure to carcinogens, the need to re-evaluate tactics and procedures so as to minimise risk, and the importance of social partnership. The chapter clearly refers to “leadership *and* culture” not “leadership culture”, and deals with workplace culture at all levels. Governance issues are covered in chapter 4, so there is no need to mention them here.

45. The introduction to this response noted that it would not be appropriate or useful for the Framework to detail legal duties to which FRAs are already subject, such as those relating to equalities or workplace health and safety. While those duties underpin much of the content of this chapter, the purpose of the Framework is to set out objectives which FRAs should pursue in their particular current contexts, not to recap the law that applies to them and all other employers in any event. We also do not think it would be appropriate for the Framework to stipulate particular internal management arrangements and policies; these are properly for each FRA to determine within the bounds of the Framework and their legal obligations.

46. However, we agree with respondents that it would be appropriate for the Framework to cover mental health issues and support for firefighters who may be at risk of them; the importance of international learning in improving firefighter health and safety; and the need to demonstrate progress in cultural improvement in general

and workforce diversification in particular. We will amend the text of the Framework accordingly.

Q7. Do you think that the narrative and objectives in the Corporate Issues chapter are appropriate and important?

47. All 20 respondents answered this question, 12 of which agreed with the content of the chapter, a further 6 felt that other issues should also be mentioned, and/or existing issues should be covered in more detail. 2 respondents did not answer the question.

48. 5 respondents argued that the chapter should provide greater reference to the importance of collaboration across organisations. Respondents also commented that the level of bureaucracy was currently stifling development and that greater transparency and accountability was required going forward.

49. Other suggestions included reference to staffing and resource levels in particular, the importance of collaboration and resourcing not being driven by cost restraints. One respondent felt that references to diversity and inclusion ambitions within the chapter could be strengthened, including the need for clear targets that would help demonstrate how diversity improves service delivery and community trust. Another responded noted that reference should also be made to the importance of the role and retention of support staff.

Welsh Government Response:

50. Again, we are pleased that this chapter of the draft Framework attracted a high level of support, at least in principle. It will form the basis of the final text, subject to the changes we describe under the next heading. Our response to proposals to cover other issues is under the question below.

Q8. Are there other issues that we should include in this chapter?

51. Of the 20 respondents, 12 called for other issues to be covered, two felt there were no such issues, and 6 did not answer this question.

52. 6 respondents argued that more analysis should be given to the cost of achieving net zero and whether this is feasible given current cost pressures, one respondent also mentioned that electrical vehicle charging should be made available to staff. Other comments in respect of sustainability included the importance of climate change reporting and also the need to consider the unique characteristics of Wales – for example the language and geography.

53. 10 respondents called for other issues to be covered under the governance heading, for instance 3 respondents felt that the chapter needed to provide more clarity on governance reform, it was also mentioned that staff and representative bodies views should be included in policy discussions. 3 respondents stressed the need of performance indicators, reporting mechanisms and inspection, which links to comments that were raised regarding the importance of gaining public trust. Two

respondents mentioned that the chapter should also emphasise the importance of operational learning, training and development in order to ensure that firefighters are able to conduct their role to the highest standard. In addition, two respondents argued that the chapter could be strengthened by giving more weight to community resilience and multi-agency collaboration.

54. Respondents also suggested that the Framework should include digital transformation and the need for cyber security and a requirement for FRAs to demonstrate the productivity of its workforce and value added, particularly in terms of prevention and protection and wider social value.

Welsh Government Response:

55. Since the consultation on the draft Framework ended, the Welsh Government has set out changes to governance arrangements for FRAs, which were the subject of a separate consultation. It was not possible to cover this in the draft Framework, but we will amend the final text of the Framework to do so.

56. We also agree that the Framework should include more detail on performance management and reporting, and will amend the final text accordingly. Future developments in this area will be a matter for the incoming Welsh Government following the elections to Senedd Cymru in May 2026.

57. However, the Framework already covers collaboration, the challenges of attaining net zero and social partnership (in this chapter) and workforce diversity and firefighter training (in chapter 3). And matters such as internal bureaucracy and on-site charging for staff-owned vehicles are for local management to determine. We do not believe any further provision is needed on these issues.

Q9. We would like to know your views on the effects that the above 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?

58. Of the 20 respondents, 7 provided a substantive comment to the question, 7 stated that they did not have a view and 6 respondents did not answer the question at all.

59. 1 respondent commented that they did not feel there would be effects on the Welsh language as English was their preferred language. 3 respondents raised concerns that integration of the Welsh language could cause potential issues, in particular, that there may be unintended consequences if language issues are not mainstreamed in implementing framework, there should be bilingual tools in place for planning and reporting on objectives and care should be taken that promotion of the Welsh language does not inadvertently alienate English speakers.

60. 2 respondents commented that the Welsh language standards should be promoted in the workplace with the opportunity for staff to undertake lessons. One

respondent raised concerns that drill and incident ground language should be in English only to ensure the safety of firefighters and the public.

Welsh Government Response:

61. Several of the responses we received appeared to call into question the use or value of the Welsh language, for instance in training or at incidents. We do not agree with that: the Welsh and English languages have equal status, as do individuals' preferences for one language or the other. We believe it can and should be left to firefighters to use whichever is most appropriate in the circumstances. There is no reason at all why, for instance, a training course for firefighters should not be delivered in Welsh if that is the preference of those involved. Nor do we agree that promotion of the Welsh language alienates English speakers.

62. Provision of Welsh lessons for FRS staff is commendable, but is a matter for local management that does not need to be included in the Framework.

63. Overall, we do not believe any amendments to the Framework are needed in light of the responses to this question.

Q10. Please also explain how you believe the proposed policy 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.

64. 13 respondents answered this question, 8 of which provided substantive comments. 7 respondents did not answer the question.

65. 5 respondents felt that the Framework could strengthen the use of the Welsh language and suggested that it may be helpful to include more direct references to the Welsh language across relevant sections. Other comments included the consideration of language issues when undertaking community risk profiling and expanding bilingual leadership of the Service.

66. Other respondents suggested that all responses to consultations should be translated and published bilingually and that Welsh Government should consider funding Welsh language digital tools.

Welsh Government Response:

67. We agree that some earlier sections of the Framework could have said more about the Welsh language. For example, fire safety advice is more effective if it is delivered in the language which the recipient prefers to use. It follows that FRAs should take steps to understand the linguistic profiles of their areas, and we will make appropriate amendments to chapter 2 of the Framework.

68. However, it is not normal Welsh Government practice to publish (or translate and publish) verbatim responses to consultations, and doing so here would not add

any value. And the provision of bilingual software to FRS staff is again a matter for local management; it does not need to be included in the Framework.

Q11. We have asked a number of specific questions. Do you have any other comments on our proposals or any related issues which we have not specifically addressed?

69. 11 respondents provided a substantive comment to this question, 3 didn't provide a substantive comment. 6 respondents did not answer the question at all.

70. 3 respondents argued that the Framework should provide more detail around resourcing and leadership, in particular the need to recruit and retain retained duty firefighters. It was also suggested that the document should set out clearly the required crewing and pump attendance levels at incidents. One respondent commented that the impact of cultural fragmentation should be addressed.

71. 5 respondents suggested that the Framework could be strengthened by providing greater clarity on proposals for governance reform. Further comments were made regarding the need for a wider partnership landscape within which Fire and Rescue Services in Wales operate and participate. In addition, 3 respondents suggested that further information should be included regarding how progress against the Framework is measured and reported. One respondent called for more consideration to be given to staff and public feedback when drafting the Framework.

72. 5 respondents suggested that operational issues should be expanded to consider the health and safety of firefighters, particularly in respect of carcinogens, funding available for anti-cancer measures and also wellbeing and fatigue of front line firefighters. Respondents also commented that the Framework should refer to the reduction in automatic fire alarm call outs, funding provision for high rise training, broadening the role of firefighters and also the need for more references to the National Operational Guidance. One respondent called for the Welsh Government to assist with security clearances which would allow the Fire and Rescue Services to undertake effective preparation and response to terrorist and similar events. In addition, one respondent commented that careful consideration should be given to the balance of achieving net zero against operational risk. It was also noted that the Framework should address the increasing need for the use of IT within the Service.

73. One respondent raised concerns that the draft Framework links fire prevention and effective firefighting as components of climate change mitigation, particularly if it leads to expectations that fire and rescue services could be held accountable for the emissions from incidents they did not cause or could not prevent. It was argued that further clarity and assurance should be provided that the role of the Fire and Rescue Services will be considered in the implementation of the Framework and related legislation.

Welsh Government Response:

74. Many of the matters raised in response to this question have already been addressed in earlier questions, and/or are already covered in the Framework. These include governance reform, the sustainability of the retained duty system, false

alarms, broadening the role of firefighters and the risks posed by exposure to carcinogenic combustion products. We have noted earlier in this document where we will amend the Framework on these matters.

75. Other responses raised issues which are squarely within the remit of local management, including crewing arrangements at incidents and training in high-rise firefighting; or issues of an administrative nature like security clearances for FRS staff. We do not believe the Framework should cover such matters.

76. However, we agree that the reference to climate change mitigation in chapter 4 of the Framework should be clarified. Fires can be a very significant source of carbon emissions, so fighting or preventing them effectively contributes to climate change mitigation. That cannot mean the FRS is in some way answerable for those emissions, any more than it is accountable for the occurrence of a fire. The point is that the FRSs' efforts to reduce emissions in this way should not be overlooked. We also agree that it would be appropriate to refer to National Operational Guidance in Chapter 2 of the Framework. We will amend the text accordingly.

Next steps

77. The text of the Framework will be amended in light of the responses to the consultation, as noted above.

78. Section 21(6) of the 2004 Act provides that the Framework, as first prepared and any revisions to it which appear significant to the Welsh Ministers have effect only when brought into effect by an Order made by the Welsh Ministers. We propose to make that Order, and lay it before Senedd Cymru, in early March 2026. The Framework will then come into effect on 30 March 2026.

Annex 1 – List of Respondents

- North Wales Fire and Rescue Service
- Mid and West Wales Fire and Rescue Service
- South Wales Fire and Rescue Service
- South Wales Commissioners
- National Fire Chiefs Council
- Fire Brigades Union
- Fire and Rescue Services Association
- Caerphilly County Borough Council
- Welsh Local Government Association
- Equality and Human Rights Commission
- Senseia
- Royal Society for the Prevention of Accidents
- Western Beacons Mountain Rescue Team
- Seven individuals, one of whom was anonymous. Several of the others requested anonymity, and we see no particular value in identifying the rest.