

Appendix 1

Consultation Response: Draft National Framework for Fire and Rescue Services in Wales

Question 1: Do you agree that the account of the strategic challenges facing the Service is fair and comprehensive?

Yes, NWFRS agrees that the account of the strategic challenges is broadly fair and comprehensive. The Framework captures the complexity of the environment in which we operate, including the impacts of climate change, demographic shifts, technological developments, and global security threats. These are consistent with many of the key risk factors identified in our Community Risk Management Plan and are already influencing how we plan and deliver services. The recognition of the success in reducing fire-related incidents, alongside the need to adapt to emerging risks, reflects our own journey and strategic direction.

Question 2: Are there other issues that we should include in this chapter?

The chapter is well-developed and aligns with the broader themes of the Framework. In reviewing the document, we note that areas such as digital transformation, workforce sustainability, and public expectations around transparency and accountability are addressed in later sections. These are increasingly relevant to the strategic context and may benefit from earlier acknowledgement to reflect their influence on long-term service planning.

Question 3: Do you think that the narrative and objectives in the resourcing to risk chapter are appropriate and important?

Yes, NWFRS supports the narrative and objectives in this chapter. The emphasis on understanding and responding to risk at a local level, supported by data and intelligence, is central to our Community Risk Management Planning. The chapter reflects the need to maintain core services while adapting to seasonal and emerging risks, and it aligns with our approach to resource planning, rural resourcing, and community engagement. NWFRS is actively trialling new crewing models and undertaking frontline cover review activity to strengthen rural availability, whilst maintaining effective response provision within urban areas.

The emphasis on prevention alongside effective response aligns with our five community risk principles (People, Prevention, Protection, Response and Environment) and our wellbeing and improvement objectives.

The focus on aligning capacity and capability with risk is consistent with our statutory duties and organisational priorities.

Being prepared for future risk and being able to respond to a changing and emerging landscape is vitally important to us. Whether that be the physical risks that our crews face when responding to emergencies, or those risks that we face as organisations in terms of our behaviours, inclusivity and organisational culture.

Our ambition to develop a new training and development hub in North Wales will enable us to prepare for and be ready to address existing challenges and those of the future.

Question 4: Are there any other issues or objectives that we should include in this chapter?

In the context of our current and future operating environment, there may be further opportunity to reflect the role of predictive modelling and scenario planning in anticipating and preparing for emerging risks. Additionally, while rural service delivery and the sustainability of the Retained Duty System are referenced elsewhere in the Framework, their inclusion within this chapter would provide important context for understanding the operational realities and resourcing challenges faced by Welsh fire and rescue services.

Question 5: Do you think that the narrative and objectives in the people, leadership and culture chapter are appropriate and important?

Yes, NWFRS agrees that the chapter appropriately highlights the importance of people, leadership, and culture in delivering effective fire and rescue services. The focus on health, safety, wellbeing, and inclusive leadership aligns with our organisational values and ongoing work to support workforce resilience and cultural improvement. We welcome the recognition of the challenges facing the sector and the need for sustained investment in people and leadership development.

Question 6: Are there any other issues or objectives that we should include in this chapter?

While the Framework references a culture of 'professionalism, openness, inclusion and innovation', there may be value in further exploring how a shared understanding of culture across Welsh Fire and Rescue Services could be developed. A collective articulation of what positive culture looks like - agreed across the three Services and stakeholders - could support consistency, accountability, and long-term improvement. This would also align with the principles of social partnership and the Well-being of Future Generations (Wales) Act 2015. A shared understanding could also support the development of consistent leadership behaviours, reinforce sector-wide learning, and enhance public confidence in the values and conduct of fire and rescue services across Wales. This work would build upon and go beyond the principles of public life and National Fire Chief's Council Core Code of Ethics.

Question 7: Do you think that the narrative and objectives in the corporate issues chapter are appropriate and important?

NWFRS agrees that the narrative and objectives in the corporate issues chapter are appropriate and important. The emphasis on governance, strategic leadership, and accountability reflects the responsibilities of Fire and Rescue Authorities and supports effective decision-making. The chapter aligns with our commitment to transparency, value for money, and continuous improvement, and supports our engagement with partners and stakeholders across the public sector.

Question 8: Are there any other issues or objectives that we should include in this chapter?

The corporate issues chapter presents a clear and well-considered overview of governance and leadership responsibilities. In the context of a changing operating environment, there may be further opportunity to reflect the increasing relevance of digital transformation, cyber resilience, and longer-term workforce planning in supporting effective and sustainable service delivery. These areas are becoming more central to how fire and rescue services manage risk, maintain public confidence, and adapt to future challenges.

Additionally, the chapter could more clearly acknowledge the value of structured organisational learning and meaningful community engagement in strengthening transparency and accountability. These approaches are important in supporting continuous improvement and ensuring that governance arrangements remain responsive to the needs and expectations of the communities we serve.

Question 9: What effects do you think 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? How could positive effects be increased, or negative effects be mitigated?

NWFRS recognises the importance of the Welsh language as a core part of our national identity and is committed to treating the Welsh language no less favourably than English, in line with the Welsh Language Standards.

The draft Framework presents a number of areas where the policy proposals could support the use of Welsh, particularly in prevention and engagement activities. The Framework's emphasis on community engagement and inclusive service delivery also supports bilingual communication, particularly during consultation processes such as those linked to the CRMP.

However, the potential impact on the Welsh language may vary depending on how individual services interpret and implement the proposals. For instance, changes to service distribution — impacting assets within Welsh heartland communities — could have unintended consequences for linguistic continuity. Similarly, while the Framework references inclusion and diversity, it does not explicitly mention linguistic diversity or the Welsh language as a cultural asset.

To increase positive effects and mitigate potential risks, more explicit recognition of the Welsh language within the Framework would help ensure consistent consideration across all services and policy areas.

Encouraging the integration of Welsh language considerations into strategic planning and workforce strategies would support consistency across the Welsh fire and rescue services and help ensure that the language is visible, accessible, and actively promoted in both internal and external service delivery.

Question 10: 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.

To strengthen the Framework's impact, it may be helpful to include more direct references to the Welsh language across relevant sections.

Explicitly acknowledging the role of the Welsh language in areas like workforce development, public communication, and engagement with children and older people would help ensure that opportunities to use Welsh are not only protected but actively promoted. This would also support alignment with local Welsh in Education Strategic Plans (WESPs), particularly in contributing to Outcome 5: increasing opportunities for learners to use Welsh in different contexts.

NWFRS remains committed to promoting the Welsh language through our compliance with the Welsh Language Standards and through ongoing investment in staff training, bilingual resources, and inclusive engagement. We welcome the opportunity to work with Welsh Government and partners to ensure that the Framework supports a consistent and proactive approach to linguistic inclusion across all Welsh fire and rescue services.

Question 11: We have asked a number of specific questions about the proposed new Framework. If you have any related issues or comments which we have not specifically addressed, please use this space to record them.

NWFRS welcomes the overall direction of the draft Framework and its alignment with our statutory duties and strategic priorities. The Framework provides a basis for the continued evolution of fire and rescue services in Wales, particularly in the context of a changing risk landscape and increasing public expectations.

NWFRS recognises the importance of a shared understanding of what constitutes a positive and inclusive culture across Welsh fire and rescue services. While the Framework references professionalism, openness, inclusion, and innovation, there may be value in further exploring how a collective articulation of culture could support consistency, accountability, and sector-wide improvement.

NWFRS also notes the growing significance of digital transformation, data governance, and cyber resilience in shaping modern public services. These areas are increasingly central to how we plan, deliver, and assure our services, and may warrant further consideration in this or future iterations of the Framework.

NWFRS recognises the importance of environmental sustainability and supports the principles of the Well-being of Future Generations (Wales) Act 2015, including the need to protect biodiversity and reduce carbon emissions. However, we note with some concern how the Framework frames fire prevention and effective firefighting as components of climate change mitigation. While we fully support the intent to reduce the environmental impact of fires, we are mindful of the potential implications of this framing — 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 reasonably prevent.

This concern is heightened by the current development of environmental legislation which, as we understand it, does not make provision for emergency services to be exempt from certain restrictions during emergency response. Coupled with the Framework's reference to scrutiny from regulators, this raises questions about how emergency services will be supported to meet their environmental responsibilities without compromising their ability to respond effectively to incidents.

NWFRS remains committed to reducing our own environmental impact and to supporting national sustainability goals. However, we would welcome further clarity and assurance that the unique role and operational realities of emergency services will be appropriately considered in the implementation of both this Framework and related environmental legislation.