

AWDURDOD TÂN AC ACHUB GOGLEDD CYMRU



NORTH WALES FIRE AND RESCUE AUTHORITY

A meeting of the **NORTH WALES FIRE AND RESCUE AUTHORITY** will be held on **MONDAY 21 JULY 2025** virtually **via Zoom** at **10:00**.

Yours faithfully,
Gareth Owens
Clerk

AGENDA

- 1. Apologies**
- 2. Declarations of Interest**
- 3. Notice of Urgent Matters**
Notice of items which, in the opinion of the Chair, should be considered at the meeting as a matter of urgency pursuant to Section 100B (4) of the Local Government Act, 1972.
- 4. Minutes of the Fire Authority Meeting held on 28 April 2025**
- 5. Matters Arising**

Standing Agenda Items
- 6. Chair's Report**
- 7. Independent Cultural Review Update**
- 8. Training Centre Project Update**
- 9. Emergency Cover Review**

Reports Previously Considered by Audit Committee
- 10. Draft Statement of Accounts 2024-25**
- 11. Annual Governance Statement 2024-25**

Reports Previously Considered by Executive Panel
- 12. Performance Monitoring Report April 2024 to March 2025**
- 13. Chief Fire and Rescue Advisor and Inspector for Wales's Inspection Report**

Cont....

Items for Consideration

14. Firefighters' Pension Schemes Discretionary Policy Statement

15. Firefighters' Pension Schemes Local Pension Board Annual Report 2024/25

16. Ratification of Appointments of Principal Officers

17. Urgent Matters

To consider any items which the Chair has decided are urgent (pursuant to Section 100B (4) of the Local Government Act, 1972) and of which substance has been declared under item 2 above.

PART II

It is recommended pursuant to Section 100A (4) of the Local Government Act, 1972 that the Press and Public be excluded from the meeting during consideration of the following item(s) of business because it is likely that there would be disclosed to them exempt information as defined in Paragraph(s) 12 to 18 of Part 4 of Schedule 12A of the Local Government Act 1972.

18. None

NORTH WALES FIRE AND RESCUE AUTHORITY

Minutes of the meeting of **North Wales Fire and Rescue Authority** held on **Monday 28 April 2025** virtually via **Zoom**. Meeting commenced at **09.30**.

Councillor

Dylan Rees (Chair)
Paul Cunningham (Deputy Chair)
Bryan Apsley
Marion Bateman
Carol Beard
Tina Claydon
Ann Davies
Adele Davies-Cooke
Sharon Doleman
Jeff Evans
Alan Hughes
Chris Hughes
John Brynmor Hughes (left 10:57)
Gareth R Jones
Marc Jones
Gwynfor Owen
Beverley Parry-Jones (left 11:25)
Arwyn Herald Roberts
Austin Roberts
Gareth A Roberts
Rondo Roberts
Paul Rogers
Gareth Sandilands
Dale Selvester
Antony Wren
Mark Young

Representing

Anglesey County Council
Flintshire County Council
Wrexham County Borough Council
Flintshire County Council
Conwy County Borough Council
Flintshire County Council
Denbighshire County Council
Flintshire County Council
Conwy County Borough Council
Anglesey County Council
Denbighshire County Council
Conwy County Borough Council
Gwynedd Council
Conwy County Borough Council
Wrexham County Borough Council
Gwynedd Council
Wrexham County Borough Council
Gwynedd Council
Conwy County Borough Council
Gwynedd Council
Wrexham County Borough Council
Wrexham County Borough Council
Denbighshire County Council
Flintshire County Council
Flintshire County Council
Denbighshire County Council

Also present:

Dawn Docx
Helen MacArthur
Stuart Millington
Justin Evans
Anthony Jones
Dafydd Edwards
Gareth Owens
Matthew Powell
Elgan Roberts
Steve Morris
Rhian Williams
George Jones
Lisa Allington

Chief Fire Officer (CFO)
Assistant Chief Fire Officer (ACFO)
Assistant Chief Fire Officer (ACFO)
Assistant Chief Fire Officer (ACFO)
Assistant Chief Fire Officer (ACFO)
Treasurer
Clerk and Monitoring Officer
Deputy Clerk and Monitoring Officer
Head of Finance and Procurement
Head of ICT
Deputy Head of Corporate Communications
Atebol Translation Services
Members' Services

1 APOLOGIES

Councillor

John Ifan Jones

Representing

Anglesey County Council

ABSENT

Councillor

Rob Triggs

Representing

Gwynedd Council

The above apologies were offered and accepted.

2 DECLARATIONS OF INTEREST

- 2.1 The Clerk, Deputy Clerk and Treasurer all declared an interest in Item 21 and confirmed that they would be leaving the meeting before that paper was discussed.

3 NOTICE OF URGENT MATTERS

- 3.1 No notice of urgent matters had been received.

4 MINUTES OF THE FIRE AND RESCUE AUTHORITY MEETING HELD ON 20 JANUARY 2025

- 4.1 The minutes of the North Wales Fire and Rescue Authority (the Authority) meeting held on 20 January 2025 were submitted for approval.

4.2 **RESOLVED to:**

- i) **approve the FRA minutes from 20 January 2025 as a true and correct record of the meeting held.**

5 MATTERS ARISING

- 5.1 It was noted that in relation to paragraph 5.1 of the minutes, the Chief Fire and Rescue Advisor's review into Firefighting Techniques, this review had now been completed and was in its final draft. The report would be brought to the next Authority meeting in July. Members were advised that recommendations in the report were already being acted upon.
- 5.2 In relation to paragraph 5.3, Members were advised that ACFO Stuart Millington had decided to retire and would be leaving at the end of June. DCFO Stewart Forshaw had also decided to resubmit his retirement notice and would be leaving at the end of the month. Thanks were given to both officers for their tireless work over their many years of service and for their considerable contribution to the work of North Wales Fire and Rescue Service (the Service). This sentiment was echoed by the Chair and Members.

- 5.3 Cllr Doleman asked for her personal thanks as the Authority's Equality and Diversity (EDI) Champion to be passed to DCFO Forshaw for the dedication that he had put into equality and diversity across the Service. His contribution had been considerable and had made a huge difference to EDI across the Service.
- 5.4 The Chair confirmed that he had attended the funeral of Brian Gorling.

6 CHAIR'S REPORT

- 6.1 It was noted that a written paper had been provided to Members to inform them on the meetings and events attended by the Chair and Deputy Chair of the Authority in their official capacities between January and March 2025.

6.2 RESOLVED to:

- i) Note the information provided within the paper.**

7 EMERGENCY COVER REVIEW

- 7.1 ACFO Jones presented the Emergency Cover Review paper which provided Members with an update on the work of the Emergency Cover Review (ECR) Task and Finish subgroup. This was set up in response to the recommendation from the 20 January 2025 meeting for officers to continue to devise and test alternative solutions with representative bodies, within the agreed budget, to address emergency cover in rural locations.
- 7.2 ACFO Jones confirmed that the Fire Brigades Union (FBU) had committed to signing a collective agreement and that this had now been signed off by Ben Selby at an executive level.
- 7.3 The hard work and commitment shown by members of the ECR group, particularly Terry Ledden and Rebekah Uden of the FBU and Nick Roberts and Tom Weston as Chair and Deputy Chair of the ECR Working Group, was acknowledged and both ACFO Jones and Members asked that their thanks be passed on. The Chair and the CFO also gave thanks to those involved in this very long and measured process and congratulated them for reaching a collective agreement.
- 7.4 It was asked how this would reduce the identified risk in terms of day cover in rural areas and ACFO Jones clarified that the aim of the collective agreement was to make the existing wholtime stations self-resilient, i.e. realigning their own absence cover, start and finish times and annual leave etc., which would release some of the funds from the establishment budget in order to deliver a more efficient and effective service in partnership with the on-call cohort in the more rural areas. This would be evaluated on a quarterly basis over the next couple of years.

- 7.5 The CFO further asked that it be noted that this was not a move to a day-staffing model but rather a shift to nucleus crewing where the wholetime firefighters form a crew with the retained firefighters in that area.
- 7.6 A Member highlighted that this subject had been debated for a long time and as such, queried whether the implementation date of January 2026 was soon enough as the risks required addressing as soon as possible. The CFO responded that some funding from the Service's transformational reserves would be used to implement the pilot on stations by the beginning of September 2025. However, recognising that it might take some time to release the funding, some reserves would be allocated to test and implement the pilot of nucleus crewing by Summer 2025.
- 7.7 The Clerk further noted that it had taken some time for a resolution to the ECR issue to be achieved and that it would likely take some time to implement solutions to such a complex issue.
- 7.8 The Chair queried why it had been decided not to pursue piloting eleven-hour shift patterns and the CFO responded that the Service was mindful of the recommendations of the Chief Fire and Rescue Advisor with regards to mitigating the risk of fatigue in firefighters. However, it had been decided to address this separately to the ECR and this would be returned to in the near future.
- 7.9 A Member noted that the Service's relationship with the FBU had been transformational and there was clear evidence of collaborative working for a better future for the Service, both in relation to the ECR and the Training Centre project. Congratulations were given to Officers for this change in the Service's relationship with the FBU.
- 7.10 **RESOLVED to:**
- i) **Note that officers have continued to work with representative bodies in social partnership to develop a way forward with the ECR;**
 - ii) **note that progress has been made in the drafting of a Collective Agreement with it being agreed in principle by the Fire Brigades Union at a meeting of the Joint Consultation and Negotiation Committee on 4 April 2025;**
 - iii) **appreciate the continued efforts of all parties to progress a solution and introduce a pilot to demonstrate the self-sufficiency of the staffing levels at the current wholetime fire stations; and**
 - iv) **Acknowledge that by demonstrating this self-sufficiency that there is scope to introduce pilots to utilise posts from the remaining establishment to provide a more efficient and effective emergency cover model across the whole of North Wales.**

8 TRAINING CENTRE PROJECT UPDATE

- 8.1 ACFO Evans delivered the Training Centre Project Update, a strategic update on the progress of North Wales Fire and Rescue Service (the Service)'s Training Centre project, incorporating recent developments from the April business case workshops, updated risk position, revised timeline, and current focus areas.
- 8.2 The Chair thanked Cllr Sandilands for his contribution as Training Centre Champion. Cllr Sandilands outlined the key outcomes for the training centre project and noted that he was committed to working towards futureproofing the Service and delivering an outstanding training centre on time and within budget to deliver first class training for the Service's firefighters. This sentiment was echoed by Members.
- 8.3 The Treasurer advised that Members be aware of the considerable financial commitment to this project and that Welsh Government grant funding should be pursued to fund as much of the project as possible, especially bearing in mind the recommendations of the Chief Fire and Rescue Advisor.
- 8.4 A Member asked whether there was a danger that the Welsh Government might not provide funding if the project was progressed as they may see this as an indication that it could be delivered without external funding. ACFO MacArthur responded that the work being carried out currently was to move the project to the next gateway, building up the design and developing the costings and funding models. This included seeking all available resources from the Welsh Government.
- 8.5 Cllr Gareth Jones asked that his reluctance to progress the project without Welsh Government funding be noted, and Cllr Sandilands responded that delaying the project would result in further financial cost to the Service in relation to project slippage and inflation, but that he agreed that most of the funding needed to come from partners rather than local authorities.
- 8.6 A Member advised that the Welsh Government preferred a preprepared project that was ready to build before committing to funding and so pushing ahead with this stage of the project was important.
- 8.7 **RESOLVED to:**
- i) **Note the revised critical path and target for RIBA Gateway 4 completion (April 2027);**
 - ii) **note progress in defining scope, specification, and delivery model through business case workshops;**
 - iii) **note the key risks identified on the project risk register and the measures in place to mitigate them; and**
 - iv) **note the strategic alignment of the new Training Centre with broader service community risk management and well-being goals.**

9 INDEPENDENT CULTURAL REVIEW INTO NORTH WALES FIRE AND RESCUE SERVICE

- 9.1 CFO Docx presented to Members the report of the independent cultural review into the Service and confirmed the next steps on the cultural journey of the Service.
- 9.2 CFO Docx emphasised that the Welsh Government were keen to work with and support the Service, both with financial input and expertise and that a meeting was due to take place to work out what that package might look like.

9.3 RESOLVED to:

- i) Acknowledge receipt of the report of the independent cultural review; and**
- ii) approve the request for financial or “in kind” support from Welsh Government to continue the cultural journey of the Service.**

10 APPOINTMENT PROCESS FOR THE POST OF ASSISTANT CHIEF FIRE OFFICER

- 10.1 The Clerk advised Members of the arrangements for the recruitment to one of the two vacant Assistant Chief Fire Officer (ACFO) posts.
- 10.2 It was clarified that appointment to the Service Leadership Team was the responsibility of the Authority and so an Appointment Committee needed to be established. In line with the Constitution, the Appointment Committee required a membership of six Executive Panel members and those eligible were asked to express their interest outside of the meeting.
- 10.3 Members noted that it was important to ensure that there was a diversity balance between members of the panel.

10.4 RESOLVED to:

- i) Note the process as outlined within the paper;**
- ii) confirm the membership of the appointments committee; and**
- iii) take appropriate steps to ensure that there is a diversity balance on the appointment panel.**

11 PROVISIONAL OUTTURN 2024/25

- 11.1 Elgan Roberts, Head of Finance, presented to Members an update on the revenue and capital expenditure forecast for 2024/25, as of 31 March 2025.

11.2 The Treasurer gave his thanks to Elgan for the work put into the paper and noted that there much of the information was already known to the Authority. He also highlighted that the Court of Appeal had found in favour of the public sector in relation to Firelink and so this was no longer a financial risk.

11.3 **RESOLVED to:**

- i) **note the draft revenue and capital outturn projections for the 2024/25 financial year as detailed within the report;**
- ii) **note the risks associated with inflation, tariffs, and supply chain issues; and**
- iii) **approve the movement to/from earmarked and general fund reserves.**

12 **BUDGET CONFIRMATION FOR 2025/26**

12.1 ACFO MacArthur presented the Budget Confirmation for 2025/26, the purpose of which was to update Members of the final revenue and capital budget for the financial year 2025/26.

12.2 It was asked how the forecast of 3.2% for the pay award would be managed internally. ACFO MacArthur clarified that the Service was carrying several vacancies which it did not intend to fill within this financial year, and this would enable the cost to be absorbed. A Member queried whether this meant that we would enter the next financial year with a cost pressure for filling these vacancies and ACFO MacArthur confirmed that it did; however, the pay budget was one of the areas scrutinised closely by the Budget Scrutiny Working Group and this would be picked up by them.

12.3 The Chair of the Budget scrutiny Working Group gave assurances as to the level of scrutiny given to the budget and thanked all those involved for their hard work.

12.4 **RESOLVED to:**

- i) **Approve the final Revenue Budget of £52.389 million;**
- ii) **approve the utilisation of reserves totalling £0.601 million;**
- iii) **approve Capital Funding of £6.103 million for the financial year 2025/26;**
- iv) **approve the utilisation of reserves to cover development costs of approximately £2.100 million for the training centre in the year; and**
- v) **note the potential impacts from global supply chain issues, tariffs, and increasing prices, which may affect future financial planning.**

13 TREASURY MANAGEMENT STRATEGY (TMS) 2025-26

13.1 The Treasurer presented the Treasury Management Strategy (TMS) 2025-26 which set out for Members the proposed Treasury Management Strategy for the period April 2025 – March 2026.

13.2 He further highlighted key figures within the report of £36m authorised limit, £33m operational boundary and £3m minimum revenue provision.

13.3 A Member asked what the percentage was in relation to new funding and refinancing existing loans. The Treasurer responded that this was detailed in Table 1 of the paper.

13.4 **RESOLVED to:**

i) Approve the Treasury Management Strategy for 2025/26.

14 PAY POLICY STATEMENT 2025/26

14.1 ACFO MacArthur delivered the Pay Policy Statement 2025/26 which informed Members of their responsibilities arising from the Localism Act 2011 (the Act). Key areas of the paper were highlighted.

14.2 **RESOLVED to:**

i) Note the requirements of the Localism Act 2011; and

ii) approve the capital funding and allocation process.

15 COMMUNITY RISK MANAGEMENT IMPLEMENTATION PLAN 2025/26

15.1 ACFO Jones presented the Community Risk Management Implementation Plan 2025/26 to Members. This provided an overview of the feedback received from the public consultation on the Community Risk Management Implementation Plan (CRMIP) 2025-2026 and the associated Equality Impact Assessment (EqIA) and sought approval of the final version of the aforementioned documents.

15.2 Thanks were given to the officers involved in producing this paper and it was noted that it had already been endorsed by the Executive Panel.

15.3 **RESOLVED to:**

i) Note the content of the feedback report; and

ii) endorse the attached CRMIP 2025-26 and associated EqIA for publication.

16 STANDARDS COMMITTEE ANNUAL REPORT 2024/25

16.1 The Deputy Clerk presented the annual report of the Standards Committee (the Committee) to Members which summarised the work carried out by the Committee between 1 April 2024 to 31 March 2025.

16.2 **RESOLVED to:**

i) **note the Annual Report.**

17 FIREFIGHTERS PENSION SCHEMES LOCAL PENSION BOARD – TERMS OF REFERENCE

17.1 ACFO MacArthur delivered the Firefighters Pension Schemes Local Pension Board Terms of Reference paper to Members which sought approval for the Terms of Reference of the Local Pension Board (LPB) for the 2025/26 financial year. Key areas of the Terms of Reference were highlighted.

17.2 The Treasurer advised that the membership quorum of the LPB had been a concern, and these changes would ensure that the required business could be undertaken.

17.3 A Member asked if there were any plans to move away from non-ethical investments and ACFO MacArthur responded that there were no underlying investments for the Firefighters Pension Scheme, although there was a liability. However, the underlying investments were looked at for the Local Government Pension Scheme (LGPS) as this scheme was asset backed.

17.4 The Treasurer further clarified that Flintshire County Council had their own pension board which was responsible for the local government pension scheme, and it was they who influenced and scrutinised the investments.

17.5 **RESOLVED to:**

- i) **Note the scope and requirements of the Terms of Reference of the Local Pension Board;**
- ii) **note the recommendation of the Local Pension Board to amend the quorum; and**
- iii) **approve the Terms of Reference of the Local Pension Board for the 2025/26 financial year.**

18 FIREFIGHTERS' PENSION SCHEME – UPDATE ON LEGAL CHALLENGES

18.1 ACFO MacArthur advised Members that the purpose of the Firefighters' Pension Scheme paper was to update them on the statutory changes to the Firefighters' Pension Scheme following significant legal challenges. These were more commonly known as the McCloud and O'Brien (Matthews 2) pension remedy exercises. The detail of the paper was summarised.

- 18.2 It was highlighted that a report had been made to the Pensions Regulator as the Service had been unable to achieve the statutory requirements.
- 18.3 A Member asked whether the financial risk in relation to these legal challenges belonged to the Authority, and ACFO MacArthur confirmed that it did.
- 18.4 It was also asked whether the Service had the capacity to cope with these challenges and ACFO MacArthur responded that there were currently no staff available nationally to bring in to support the Service's pensions team and so they were coping with the workload as best as they were able.
- 18.5 **RESOLVED to:**
- i) **Note the progress with implementing the McCloud Judgment;**
 - ii) **note that a report has been made to the Pensions Regulator as the Service has been unable to achieve the statutory requirements; and**
 - iii) **note the position regarding the implementation of the O'Brien Judgment.**

19 CONTRACT PROCEDURE RULES SUMMARY 2025

- 19.1 The Head of Finance, Elgan Roberts, presented the Contract Procedure Rules Summary 2025 to Members, the purpose of which was to present the proposed changes to the Contract Procedure Rules (CPR) of the Authority, following amendments to align with the Procurement Act 2023, implemented on 24 February 2025.
- 19.2 Members were advised that the paper had previously been to Audit Committee, and they had recommended approval.
- 19.3 **RESOLVED to:**
- i) **Approve the Contract Procedure Rules.**

20 THE SOCIAL PARTNERSHIP DUTY – ANNUAL REPORT

- 20.1 ACFO Jones delivered the Social Partnership Duty Annual Report which sought approval for the submission of the first Annual Social Partnership Duty Report to the Social Partnership Council for scrutiny, and to publish the report on the Authority's website.
- 20.2 Members were advised that the paper had previously been to Executive Panel, and they had recommended approval.
- 20.3 Members asked for their thanks to be passed on to Area Manager Sandra Williams who was retiring at the end of the month.

20.4 **RESOLVED to:**

- i) **Approve the Annual Social Partnership Duty Report for submission to the Social Partnership Council for scrutiny and publication on the Authority's website.**

21 APPOINTMENT OF MONITORING OFFICER AND TREASURER

- 21.1 The Clerk, Deputy Clerk and Treasurer all left the meeting in line with their declaration of interest.
- 21.2 CFO Docx advised Members on the requirements of the statutory posts of Monitoring Officer and Treasurer and sought approval to extend the current appointments to 31 March 2027.
- 21.3 This matter had been considered by the Executive Panel at its meeting of 17 March 2025. Following discussion and assurances on the performance of the existing arrangements, the Executive Panel endorsed the recommendation to extend the contracts for both the Monitoring Officer and S151 officer to the 31 March 2027.
- 21.4 A Member asked where the Authority stood should something happen to the Treasurer, being an individual rather than an organisation. ACFO MacArthur confirmed that either herself or the Head of Finance would pick up the role in the interim as they were both suitably qualified.
- 21.5 **RESOLVED to:**
 - i) **note the requirement to appoint to the statutory roles of Treasurer and Monitoring Officer; and**
 - ii) **approve the recommendation to extend the current arrangements to 31 March 2027.**

URGENT MATTERS

- 22.1 There were no urgent matters to consider.

Members and Officers were thanked for their participation.

Meeting closed: 11:29

Report to	North Wales Fire and Rescue Authority
Date	21 July 2025
Lead Officer	Not applicable
Contact Officer	Members Services (members.services@northwalesfire.gov.wales)
Subject	Chair's Report



PURPOSE OF REPORT

- 1 This quarterly report provides Members with information on the meetings and events attended by the Chair and Deputy Chair of North Wales Fire and Rescue Authority (the Authority) in their official capacities between April and June 2025.

EXECUTIVE SUMMARY

- 2 The Chair and/or Deputy Chair have attended several meetings and events, both internally and externally on behalf of the Authority.

RECOMMENDATION

- 3 It is recommended that Members:
 - i) **Note the information provided.**

OBSERVATIONS FROM EXECUTIVE PANEL/AUDIT COMMITTEE

- 4 This report has not previously been considered.

INFORMATION


- 5 In addition to Authority-related meetings, the Chair and Deputy Chair have met with the Chief Fire Officer (CFO) on a regular basis.
- 6 On 3 April 2025 the Chair and the CFO attended an online meeting of the National Joint Council (NJC) to discuss pay negotiations.
- 7 On 7 April 2025, following an invitation, the Chair visited Bangor Fire Station to meet with staff.
- 8 On 11 April 2025 the Chair and the Deputy Chair attended the Ceremony of Achievement for the new Wholetime Firefighters at Rhyl Fire Station.

- 9 On 14 April 2025 the Chair visited Benllech Fire Station and met with the Watch.
- 10 On 17 April 2025 the Chair, together with Councillor Sharon Doleman and members of the Principal Officers Team, attended a Culture Improvement workshop.
- 11 On 23 April 2025 the Chair visited Rhosneigr Fire Station and met with the Watch.
- 12 On 28 April 2025 the Chair attended an online meeting with members of the Audit Wales Team to discuss their review of "Assurance and Risk Assessments" within Fire and Rescue Authorities.
- 13 On 5 May 2025 the Chair visited Amlwch Fire Station and met with the Watch.
- 14 On 9 May 2025 the Deputy Chair visited Chirk Fire Station to attend a Phoenix Awards Ceremony.
- 15 On 12 May 2025 the Chair and the CFO attended a meeting of the Social Partnership Forum held at the Welsh Government Offices in Cardiff.
- 16 On 15 May 2025 the Chair and the CFO, together with other Welsh Chairs and CFO's, attended an online meeting of the WLGA Fire and Rescue Panel.
- 17 On 26 May 2025 the Chair visited Menai Bridge Fire Station and met with the Watch.
- 18 On 27 May 2025 the Chair attended an online meeting of the Culture Improvement Board.
- 19 On 1 June 2025 the Chair visited Menai Bridge Fire Station to support the Charity Car Wash.
- 20 On 6 June 2025 the Deputy Chair visited Holywell Fire Station to attend a Phoenix Awards Ceremony.
- 21 On 10 June 2025 the Chair and the Deputy Chair met with members of the Principal Officers Team to examine the Corporate Risk Register. Later the same day the Chair deputised for Councillor Gareth Sandilands (who was unavailable) in attending a meeting of the Training Centre Project Board.

- 22 On 11 June 2025 the Chair and the CFO attended an online meeting of the Social Partnership Forum.
- 23 On 18 and 19 June 2025 the Chair attended the Welsh Local Government Association (WLGA) annual conference in Llandudno along with the CFO.
- 24 On 27 June 2025 the Chair, Deputy Chair and four other Authority Members, sat on the interview panel for the appointment of ACFO posts.
- 25 On 30 June 2025 the Chair and the CFO, together with other Welsh Chairs and CFOs, attended an on-line meeting with the Cabinet Secretary and her officials.

IMPLICATIONS

Wellbeing Objectives	Not relevant.
Budget	Any costs associated with meetings and events attended by members are reimbursed from the travel and subsistence budget.
Legal	No specific implications arise from approving the recommendation.
Staffing	No specific implications arise from approving the recommendation.
Equalities/Human Rights/ Welsh Language	No specific implications arise from approving the recommendation.
Risks	No specific risks arise from approving the recommendation.

Report to	North Wales Fire and Rescue Authority	
Date	21 July 2025	
Lead Officer	Dawn Docx, Chief Fire Officer	
Contact Officer	Anthony Jones, Assistant Chief Fire Officer	
Subject	Independent Cultural Review Update	

PURPOSE OF REPORT

- 1 To present to Members of the North Wales Fire and Rescue Authority (the Authority) the draft Strategic Cultural Improvement Plan (SCIP) for approval and provide an update on progress to date on the cultural journey of North Wales Fire and Rescue Service (the Service).

EXECUTIVE SUMMARY

- 2 On 5 February 2025, the report into the cultural review undertaken by Crest Advisory was published and was presented to the Executive Panel of the Authority on 17 March 2025. Since 17 March 2025, Crest Advisory have made presentations to Authority Members, to the Service Leadership Team, to Middle Leaders and at events open to all employees, as well as to Welsh Government officials on 11 March 2025.
- 3 This paper is a progress paper and presents the SCIP for approval.

OBSERVATIONS FROM EXECUTIVE PANEL/AUDIT COMMITTEE

- 4 The Executive Panel examined the SCIP on 16 June 2025 and recommend it for the approval of the Fire and Rescue Authority.

RECOMMENDATION

- 5 It is recommended that Members:
 - i) **Approve the Strategic Cultural Improvement Plan; and**
 - ii) **note the next steps on the cultural journey of NWFRS.**

BACKGROUND

- 6 The Strategic Cultural Improvement Plan, whilst acknowledging progress has been made, targets issues such as a lack of accountability and transparency among some leaders. It proposes concrete steps to bolster trust, ensure fairness in recruitment and promotion, and invest in staff development.

- 7 This SCIP also aims to foster a diverse and inclusive workforce, improve health, safety, and wellbeing, and enhance the handling of misconduct and grievances to build on existing improvements and tackle remaining obstacles.
- 8 It aims to acknowledge that while the culture has improved since June 2021 with the appointment of the current Chief Fire Officer (CFO), negative behaviours among a minority of staff are still hindering positive change.

INFORMATION – ACTIONS COMPLETED TO DATE

- 9 Following extensive research, approval has been given by the Service Leadership Team (SLT) to start the roll out of 360 appraisals. This will begin with the SLT in July 2025.
- 10 The CFO met with Bron Biddle from the Association of Ambulance Chief Executives on 2 June 2025. The meeting was to explore, and subsequently agree, the delivery of a workshop entitled “The Wolf We feed.”
- 11 Forty senior and middle leaders received a full day of excellent “Discipline and Grievance” training funded by the Welsh Government.
- 12 The Service has re-let the contract for Occupational Health Services.
- 13 The Service has initiated a fact-finding mission to Gloucestershire Fire and Rescue Service, who have made significant progress on their own cultural journey and engaged an external cultural specialist on a 12-month contract. Of interest is the provision of a dashboard tool that can assist in tracking the progress of any cultural change implementation over a set period.
- 14 The SCIP was reviewed and discussed during the Middle Leader's Seminar held at Venue Cymru on 11 June 2025.
- 15 During the recent ACFO selection process, a stakeholder panel was established with all representative bodies invited to meet the shortlisted candidates.
- 16 Following the Emergency Cover Review process, a Collaborative Agreement has now been signed between the FBU and the Service, which seeks to improve rural fire cover and increase resilience. The Collective Agreement has also been approved by the FBU at regional and national levels.

17 A review of the Service's mental health absence and service provision was held at informal SLT on 18 June 2025, in addition to several policy reviews which support the SCIP to meet the recommendations of the report as follows:

- Complaints Management Policy
- Family-Friendly Leave
- Grievance Resolution Policy
- Menopause Policy
- Capability Policy
- Fostering Leave Procedure.

IMPLICATIONS

Well-being Objectives	Future Service provision could be impacted if the concerns highlighted by the review are not addressed
Budget	Currently within existing budgets
Legal	The Service is working with the Equality and Human Rights Commission to ensure that it complies with its legal duties under the Equality Act 2010
Staffing	Nil
Equalities/Human Rights/ Welsh Language	Nil
Risks	The report identifies both positive improvements and causes for concern. The concerns must be addressed to ensure that the Service remains an employer of choice and can attract talent to provide quality services.



Gwasanaeth Tân ac Achub
Fire and Rescue Service

Strategic Cultural Improvement Plan

ATAL AMDDIFFYN YMATEB
PREVENTING PROTECTING RESPONDING

www.tangogleddcymru.llyw.cymru
www.northwalesfire.gov.wales



Introduction and Background

This strategic cultural improvement plan for North Wales Fire and Rescue Service (NWFRS) has been created to focus on the cultural challenges identified in the recent cultural review report commissioned by NWFRS and delivered by CREST. While acknowledging progress, this improvement plan targets issues like a lack of accountability and transparency, among some leaders. It proposes concrete steps to bolster trust, ensure fairness in recruitment and promotion, and invest in staff development. This improvement plan also aims to foster a diverse and inclusive workforce, improve health, safety, and wellbeing, and enhance the handling of misconduct and grievances to build on existing improvements and tackle remaining obstacles.

This improvement plan acknowledges that while the culture has improved since June 2021 with the appointment of the current Chief Fire Officer, negative behaviours among a minority of staff are still hindering positive change.



Key Objectives

1. The primary objective of this plan is to create a more transparent, accountable, diverse, and supportive workplace, where all recommendations are fully implemented and have become “business as usual.”
2. To deliver on the areas for improvement that were identified via the main CREST report, and the subsequent departmental focus group meetings, and staff suggestion scheme.
3. To utilise SMART objectives to identify actions to meet these improvement recommendations
4. To clearly identify who will be responsible for implementing the plan to address the recommendations.
5. To regularly monitor the plan at strategic level, making any necessary adjustments as part of an ongoing strategic review process.



Key Strategic Themes

Bolstering Accountability and Building Trust

Issue: The CREST report identified an absence of accountability for past misconduct, avoidant leadership, poor decision-making, lack of transparency, and scepticism about senior leaders' commitment to cultural improvement.

Strategic Cultural Improvement Plan:

- We will consciously **lead cultural change** by example, embodying openness, accountability, and humility in accordance with the recent apologies for past behaviours issued by the Chief Fire Officer
- We will appoint a Performance and Monitoring Officer role and consult with an independent culture change implementation specialist to investigate the use of 360 appraisals for managers at all levels including SLT members, and the use of cultural champions.
- We will publicise this live '**cultural improvement plan**' with links into progress against the recommendations, inviting Fire and Rescue Authority (FRA) members to take a more active role.
- We will review existing policies that deal with complaints, discipline, and grievance, considering exit interviews in order to ensure they are fair, reflect our diverse workforce and are transparent where appropriate.

Ensuring Recruitment, Promotion and Transfer are Fair and Transparent

Issue: The CREST report identified concerns about perceived overreach and lack of transparency in positive action, fuelling doubts about fairness (particularly for women), perceived bias in promotions, and need for greater transparency in transfers.

Strategic Cultural Improvement Plan:

- We will clearly set out NWFRS's approach to positive action in a public policy, focusing on recruitment and selection to improve staff and the public's understanding of the importance of workforce diversity and how positive action supports.
- We will improve how we publicise and share successes from positive action, highlighting outcomes like increased diversity.
- We will review all existing promotional policies (including transfers) to ensure quality feedback and a robust evaluation process that considers independent quality assurance of all promotion and transfer decisions.

Investing in Every Individual's Development

Issue: Perceived gaps in training (including people management) and scarce investment in non-operational ('Green book') staff development compared to operational staff

Strategic Cultural Improvement Plan:

- We will review and look to improve "Green book" development pathways, incorporating staff feedback, highlighting horizontal progression, and current and accredited prior learning qualifications.
- We will review the appraisal policy and procedures for staff, which will consider continued professional development (including potential short-term detachments or job swaps with other services) and a system to track development requests following appraisals.
- We will deliver targeted training to managers on identifying and responding to welfare concerns, including mental health, neurodiversity, and work-life balance.

Fostering a Diverse and Inclusive Workforce

Issue: Tensions around diversity initiatives, a narrow public image of firefighters, need for increased diversity of thought/experience, and need to embed the Core Code of Ethics

Strategic Cultural Improvement Plan:

- We will review our Equality, Diversity & Inclusion (EDI) training content and delivery based on staff feedback and any recommendations from the All Wales People and Organisational Development Group (PODG) to include mandatory training on neurodiversity, violence against women, domestic abuse and sexual violence (VAWDASV)
- We will review operational competencies, and succession plans for senior roles (Strategic Manager/Area Manager and above) to potentially open senior roles to a more diverse group including those without firefighting experience.
- We will put in place a reverse mentoring scheme to reduce hierarchy barriers for improvement.
- We will review our EDI Impact Assessments, EDI data gathering and the Core code of ethics to ensure they meet both our legal requirements and workforce expectations.



Improving Health, Safety and Wellbeing

Issue: Concerns about health and safety (linked to auditing changes and disbanding PSS department), insufficient focus/capacity for safeguarding, inconsistent support for staff on long-term mental health leave, and concern about retaliation against those who speak up

Strategic Cultural Improvement Plan:

- We will complete a review of health and safety arrangements, looking at trends before and after the disbanding of PSS.
- We will review our safeguarding policy, related demand, capacity, and staff training and understanding of when and how to raise safeguarding concerns.
- We will continue to highlight and champion support roles such as Blue Light Champion/Colleague Support roles.
- Improve the management of staff returning from long-term absence with clearer structure and HR/department involvement.
- We will continue to ensure a confidential way for staff to raise concerns (Safe-Call) and raise awareness of whistleblowing processes, reviewing support for those who have raised concerns and ensuring any learning is shared where appropriate.



Improving Misconduct and Grievance Handling

Issue: Underreporting, insufficient/inconsistent responses, systemic avoidance, and lack of transparency about outcomes leading to a culture of impunity and perceptions of behaviour going unpunished Potential disproportionality in proceedings

Strategic Cultural Improvement Plan:

- We will ensure the Implementation of best practice such as NFCC fire standards on staff disclosure, complaints, grievance handling, misconduct allegations and outcomes handling, including conducting investigations regardless of staff leaving, and considering immediate dismissal in line with employment law.
- We will continue to employ subject matter experts in order to ensure misconduct allegations are managed consistently and legally utilising a case management system, whilst looking to continually develop, train and diversify investigators, FRA members and panels as appropriate.
- We will continue to revert to an external supplier for mediation processes, to ensure consistency and legal compliance.
- We will review our Grievance and Disciplinary data to identify trends, including potential disproportionality (e.g., related to Black and Minority Ethnic (BAME) staff), and report to Welsh Government in compliance with the appropriate legislation.
- We will Implement a process for sharing learning from misconduct cases while preserving confidentiality.

Insert link to table of more detailed actions to address the recommendations based on the departmental objectives template which clearly identifies who is responsible/by when, (SMART) objectives etc.



Report to	North Wales Fire and Rescue Authority
Date	21 July 2025
Lead Officer	Justin Evans, Assistant Chief Fire Officer,
Contact Officer	Lee Bourne, Training Centre Project Manager
Subject	Training Centre Project Update



PURPOSE OF REPORT

- 1 To provide Members with a progress update on the training centre project, summarising developments across legal, communications, design, ecology, and programme timelines.

EXECUTIVE SUMMARY

- 2 The training centre project continues to progress at pace. Following the first formal design meeting in June, activity has focused on planning, ecology and design feasibility. Following procurement, the contract for the primary design consultant have been signed. A communications plan has been developed and engagement with site neighbours has commenced. A short-term constraint on planned site clearance activity has been introduced following an ecology assessment. Site design is being developed to achieve an excellent sustainability standard (BREEAM¹), with estimated scores currently exceeding the minimum threshold. Cost modelling and option appraisals are in progress to support the outline business case.

RECOMMENDATION

- 3 It is recommended that Members:
 - a) **Note the current progress of the Training Centre project.**

BACKGROUND

- 4 The development of a new, fit-for-purpose training centre remains a strategic priority for North Wales Fire and Rescue Service (the Service), responding to operational risk, compliance issues and future workforce needs. The project is entering the early design and costing phase, with continued governance through the Project Board and Service Leadership Team (SLT).

¹ [BREEAM | Sustainable Building Certification](#)

INFORMATION

Legal

- 5 Following a compliant procurement process and further due diligence legal teams for both Gleeds and the Service, Veale Wasbrough Vizards (VWV) have confirmed readiness to sign the Perfect Circle contract documentation.
- 6 It has been agreed that any outstanding social value elements will be finalised retrospectively.

Communications

- 7 Letters have been hand-delivered to all residential and commercial properties near the proposed training site, explaining the scope of initial works and intention to hold an open event to view plans and discuss proposals.
- 8 Engagement with local councillors has commenced.

Design and Technical Work

- 9 The first design meeting was held on 26 June 2025 with attendance from the appointed design consultants, architects, mechanical and electrical engineers, BREEAM assessors, ecology advisors and Service staff, including operational training representatives.
- 10 The following surveys have been completed:
 - Topographical Survey
 - GPR Survey
 - Utility Survey
 - Site Investigation – Phase 1 and Interim Phase 2
 - Unexploded ordnance Survey
 - Flood consequences assessment
 - Arboriculture Survey
 - Health and safety exclusion zone plan
 - Interim planning pre application letter
 - Baseline ecology survey
- 11 The licence for the management of great crested newts has been secured and site works have been programmed.
- 12 The design brief is progressing with a requirement for the site to achieve carbon neutrality and BREEAM Excellent (target score: 75%). This is important to support the development of a business case attractive for funding.

Ecology Update

- 13 A nest of little ringed plovers (Schedule 1 species) has been confirmed near the proposed site access area. Disturbance is now legally restricted.
- 14 Quiet, manual work is permitted in the northern part of the site, but access and any machinery-based activity are prohibited until fledging is complete.
- 15 This may delay the start of site clearance by several weeks and potentially several months. The situation is being closely monitored with impacts upon project timelines being considered.

Cost Modelling and Options

- 16 National costings have been requested for:
- Training centre only;
 - Training centre with HQ;
 - Training centre with all corporate functions; and
 - A residential facility (included for completeness and to test potential efficiencies)
- 17 These options will inform the shortlisting in the Outline Business Case.

Key Project Dates

- 18 Project Timeline (Design)
- End-Aug 2025: complete design brief
 - Mid-Nov 2025: complete RIBA stage 1
 - Mid-Nov 2025: complete Outline Business Case
 - End-May 2026: complete RIBA 2/3
 - June 2026: submit planning application
 - Nov 2026: complete RIBA stage 4a
 - March 2027: agree contract price
 - Aug 2027: projected start on site
 - Jan 2029: project complete

IMPLICATIONS

Well-being Objectives	The project supports long-term workforce resilience, environmental sustainability, and future training needs.
Budget	Capital funding remains subject to business case approval. Cost options are under development and will be presented at the next project board.
Legal	Compliance with environmental law is critical due to the Schedule 1 bird protection. CDM requirements are being actively addressed.
Staffing	Input from operational training staff is informing layout and design. Additional support is being scoped to manage programme delivery.
Equalities/Human Rights/ Welsh Language	Community engagement has begun. Bilingual materials will be provided at future consultation events.
Risks	<p>Ecological restrictions may delay enabling works.</p> <p>Cost pressures and design ambition must be balanced to support affordability.</p> <p>A change to the BREEAM assessment criteria is expected in summer 2025. Projects not registered with 3 months may face more stringent assessment criteria.</p>

Report to	North Wales Fire and Rescue Authority
Date	21 July 2025
Lead Officer	Anthony Jones, Assistant Chief Fire Officer
Contact Officer	Mike Plant, Head of Planning, Performance and Transformation
Subject	Emergency Cover Review



PURPOSE OF REPORT

- 1 To provide Members of the North Wales Fire and Rescue Authority (the Authority) with an update on the work of the Emergency Cover Review (ECR) Task and Finish subgroup. This was set up in response to the recommendation from the 20 January 2025 meeting for officers to continue to devise and test alternative solutions with representative bodies, within the agreed budget, to address emergency cover in rural locations.

EXECUTIVE SUMMARY

- 2 Since April 2025, the ECR Task and Finish subgroup has been rearranged into the "Collaborative Agreement Implementation Group" (CAIG). This is due to the successful completion and sign-off of the collective agreement by the CFO and FBU, at regional and national levels.
- 3 The CAIG continues to consist of FBU officials and officers from the transformation team but has extended to include personnel from most functions to ensure that the deadlines for implementation and expressions of interest for future crewing projects amongst others are met successfully.
- 4 The CAIG continues to work together to implement the agreement and put measures in place to improve the self-resilience within the current duty system across the 8 Wholetime/Day crewed stations. Once implemented this will allow for other posts within the establishment to then be incorporated into pilots to provide a more effective and efficient model of emergency cover across the whole of North Wales.
- 5 The CAIG continues to work for the Collective Agreement to be implemented from 1 September 2025 on a pilot basis.
- 6 The Collective Agreement is attached as Appendix a.

OBSERVATIONS FROM EXECUTIVE PANEL/AUDIT COMMITTEE

- 7 This report has not been presented to Executive Panel or Audit Committee.

RECOMMENDATION

- 8 That Members:
- i) **Note that officers have continued to work with representative bodies in social partnership to develop a way forward with the ECR;**
 - ii) **note that progress has been made by the signing of the Collective Agreement by the Fire Brigades Union;**
 - iii) **note the continued efforts of all parties to progress a solution and introduce a pilot to demonstrate the self-sufficiency of the staffing levels at the current wholetime fire stations; and**
 - iv) **note that by demonstrating this self-sufficiency that there is scope to introduce pilots to utilise existing establishment budgets to improve emergency cover model across rural North Wales.**

BACKGROUND

- 9 During the period of July to September 2023 the Authority consulted the public on three viable options for the future delivery on its emergency response to the communities of North Wales. A decision was taken by the Authority in December 2023 not to implement any of the proposals at that time but to continue to work on variations to the proposals. The proposals in the consultation do, however, remain live.
- 10 A Task and Finish Group comprising of 16 colleagues working at various levels, stations, and departments throughout NWFRS, including representatives of the Fire Brigades union (FBU) met on 12 occasions between February and November 2024, during which time they discussed and researched several emergency response models.
- 11 Several options were scoped by the Task and Finish Group including different models for rostering staff differently to release the posts required to base them in additional locations to support the provision of a more efficient and effective emergency cover model. This included how the current rostering arrangements could be more self-resilient. The basis for the Collective Agreement is therefore not a new idea but one that has been revisited by the subgroup before proposals from the public consultation are reconsidered.

- 12 On 17 December 2024, the Chief Fire Officer and Deputy Chief Fire Officer met with the workstream leads and the FBU Chair to confirm this position and to thank all those involved for their hard work and diligence.
- 13 At its meeting on 28 April 2025, the Authority reaffirmed its commitment to providing a more effective and efficient emergency cover model across the whole of North Wales to address the risks identified during the emergency cover review that recognised the challenges of providing emergency cover in rural areas and how the use of resources needed to be adapted with no increase to the budget.

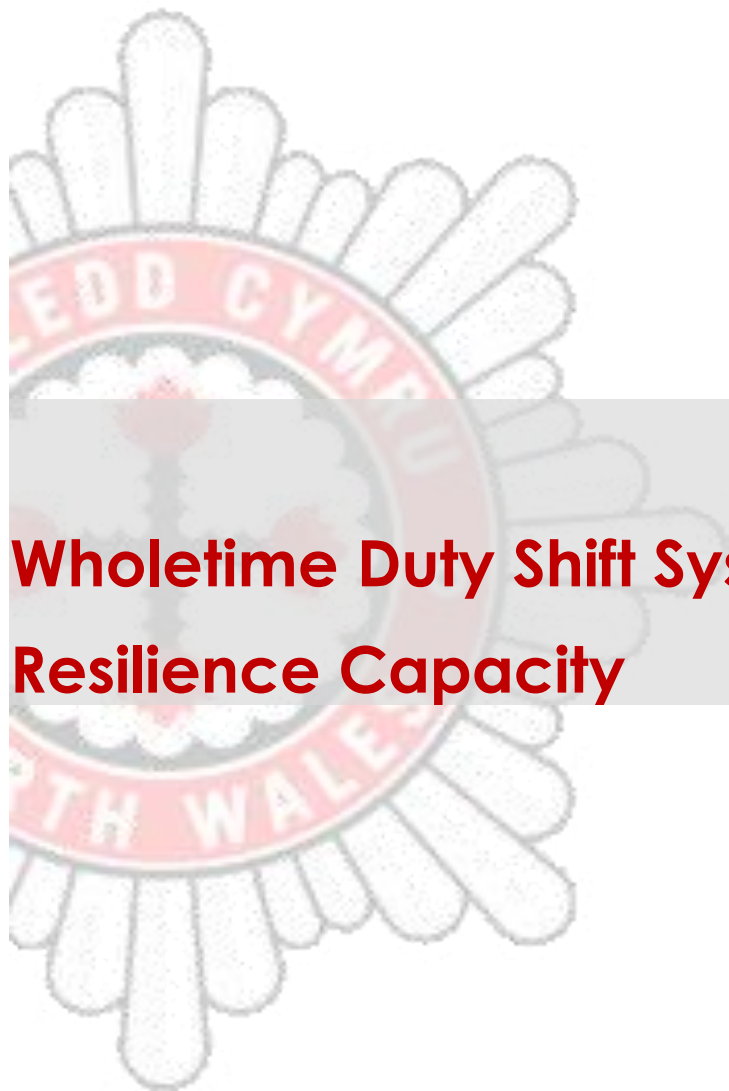
INFORMATION

- 14 The Collective Agreement has amended the start and finish times for all 24hr and Day-Crewed stations. This would commence on 1 September 2025, subject to some further collective work around associated roster and leave policies and procedures. The first full 12-month pilot of an 08:00 start with a 10-hour day shift will start on 1 January 2026. This would coincide with the start of the leave year and would run for 24 months.
- 15 An internal memorandum was sent to all operational personnel in June 2025 detailing the changes to start and finish times in line with social partnership principles to allow personnel as much notice as possible to make any necessary arrangements. A central repository of information and guidance documents including Frequently asked questions (FA) has been created by the CAIG on the service Hwb for the benefit of all affected personnel.

IMPLICATIONS

Well-being Objectives	The ECR outcomes must meet the Authority's obligations under the Well-being of Future Generations (Wales) Act 2015.
Budget	Any solution must be within the approved budget.
Legal	Na
Staffing	The Service has continued to work with staff and their representative bodies and will continue to do so. Regular updates are provided at the JCNC and via the Weekly Brief as well as via visits to stations by officers.
Equalities/Human Rights/ Welsh Language	The Service's Equality, Diversity and Inclusion (ED&I) Officer engaged with ED&I groups throughout the consultation. The ECR is within the Community Risk Management Implementation Plan (CRMIP) with feedback also gathered on this.
Risks	The ECR and the work of the resultant CAIG seeks to reduce the risks of not being able to respond to emergencies effectively and efficiently in the communities of North Wales.

Collective agreement



**Wholetime Duty Shift Systems
Resilience Capacity**

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ABBREVIATIONS

DC	-	Day Crewing
WDS	-	Wholetime Duty Shift
WT	-	Wholetime
NWFRS	-	North Wales Fire and Rescue Service
FA	-	Fire Authority
FBU	-	Fire Brigades Union
NJC	-	National Joint Council
WDSR	-	Wholetime Duty Shift Rural
TC	-	Training Compensatory
TIL	-	Time in Lieu
BH	-	Bank Holiday
LS	-	Long Service Leave
GA	-	Good Attendance Leave

DEFINITIONS

CREWING DEFICIENCIES - This includes all planned and unplanned leave, absence (as per the Grey Book) and pre planned activities including off watch training. The Rostering Policy provides further clarification.

WDS SHIFT DUTY SYSTEM - The NWFRS WDS Shift Duty System is a National Joint Council for Local Authority Fire and Rescue Services, Scheme of Conditions of Service (Grey Book) agreed shift system based on personnel working all of their duty hours on station with no on call element. The Grey Book refers to this as 'Shift Duty System' with each period of twenty-four hours being divided into a day shift and a night shift. This document will therefore use this terminology for Rhyl, Deeside and Wrexham.

THE AGREEMENT

1. This collective agreement details the current resilience capacity within two of the existing Wholetime Duty Shift (WDS) systems currently in use in North Wales Fire and Rescue Service (NWFRS) as agreed by NWFRS and the Fire Brigades Union (FBU). These being the WDS shift duty system in operation at Deeside, Rhyl and Wrexham, and the Day Crewed (DC) shift duty system in operation at Caernarfon, Bangor, Holyhead, Llandudno and Colwyn Bay.
2. This collective agreement details clarification of existing practices and changes to working practices that will enhance the existing resilience across these duty systems, for this capacity to be released to provide a more effective and resilient response model for the whole of North Wales.
3. This agreement has primacy over previous agreements where applicable.

ADMINISTRATION OF THE AGREEMENT

4. The administration of the agreement will be the responsibility of the Head of Response and the Chief Fire Officer in conjunction with representative bodies. In operating this collective agreement, the Head of Response and the Chief Fire Officer will ensure that the Service is mindful of its responsibilities for equality in the workplace.

PURPOSE OF THE AGREEMENT

5. The agreement has been designed in Social Partnership to detail the current working arrangements and existing resilience capacity within two WDS systems already utilised in the Service. In addition, the agreement contains clarification of current working practices, and amendments to working practices that will collectively illustrate how the existing eight Wholetime stations in NWFRS can be self-resilient within the current establishment of 178 posts. This will enable the additional capacity within the establishment of 208 posts to be released to provide a more effective and resilient response model for the whole of North Wales

SCOPE

6. This collective agreement will apply to all WDS system based operational personnel deployed to the eight NWFRS stations referenced above.

DATE OF OPERATION

7. The practices contained within this collective agreement are detailed in the Wholetime Rostering Policy and Procedure (which will require regular review throughout this pilot in conjunction with representative bodies). This will be implemented on the 1st September 2025 along with revised Rostering Policy and associated documents, after the signing of this collective agreement between the Service and the representative bodies and will be monitored and reviewed as follows.

MONITORING OF THE AGREEMENT (to commence fully on 1st January 2026)

8. The operation of the system will be jointly reviewed in at least quarterly intervals by the Head of Response and the Chief Fire Officer in conjunction with representative bodies with feedback shared with all staff. Regular updates will be provided to the Fire Authority. The purpose of the review will be to consider progress, performance and other issues in relation to:
 - a.) Staff welfare
 - b.) Staffing and resilience
 - c.) Pump availability
 - d.) Attendance management (Inc. Short and long-term sickness cover)
 - e.) Shift start and finish times
 - f.) Detachments
 - g.) Leave allocation
 - h.) Resilience/detachment/overtime payments
 - i.) Training
9. The CFO and FBU Brigade Secretary will be responsible for facilitating the reviews whilst reserving the right to delegate, as appropriate to another Officer.
10. The CFO or the FBU Brigade Secretary reserves the right to revise any aspect of this agreement subject to appropriate negotiation, to deliver a more effective and resilient response model for the whole of North Wales.

INTRODUCTION

11. NWFRS currently operates two duty shift systems specific to Wholetime Firefighters based at the eight existing Wholetime Fire Stations in NWFRS. These are Day Crewed and WDS Shift Duty System, both of which are National Joint Council (NJC) Grey Book agreed. An additional duty system for Wholetime Firefighters, the Wholetime Duty System Rural (WDSR) has been locally agreed. NWFRS also operate the Day Duty System and a bespoke Training Delivery Manager shift pattern for non-station based Wholetime Firefighter roles. Any additional duty system would be subject to local agreement with representative bodies.
12. This document focusses on the WDS Shift Duty System and Day Crewed duty systems only in order to demonstrate how through adherence to existing rostering protocols the eight Wholetime stations in NWFRS can be self-resilient, within the current establishment of 178 posts.
13. By demonstrating the above, any additional posts above these 178 up to the maximum existing establishment of 208 can therefore be utilised to provide a more effective and resilient response model for the whole of North Wales.

DAY-CREWING DUTY SYSTEM OVERVIEW

14. NWFRS Day-crewing duty system is a National Joint Council (NJC) Grey Book agreed shift system based on working a combination of hours both on station and on call from a base location.
15. On call cover is provided by either residing (and providing an address) in owned or rented accommodation within a specified response area/time of the Day-crewing duty system station in question (approximately five minutes).
16. This arrangement of on station hours and on call hours enables personnel to provide an immediate response to incidents during on station hours and an approximately five-minute response during on call hours.
17. Currently NWFRS operate five Day-crewing duty system stations across the Service with each station using a two-watch system with seven posts on each watch, these being located at Caernarfon, Bangor, Holyhead, Llandudno and Colwyn Bay.

The NJC Scheme of Conditions of Service (Grey Book) states:

The hours of duty of full-time employees on this system shall be an average of forty-two per week. The hours of duty of part-time employees shall be pro-rata. The rota will be based on the following principles:

- 1. An average of thirty-five hours per week shall be worked at the station.*
- 2. An average of seven hours per week shall be on standby at home. Staff members are required to respond to any emergency call received during this standby period.*
- 3. Staff members on this system may be requested to undertake retained duties outside the hours at 1 and 2.*
- 4. There shall be at least two complete periods of twenty-four hours free from duty each week.*
- 5. One hour per day shall be specified as a meal break. Account shall be taken of meal breaks interrupted by emergency calls.*

WORKING HOURS DAY CREWING

18. Staff are required to work an average of 182.5 shifts per year, excluding annual leave as calculated by the four days on followed by four days off shift pattern.
19. One shift is classified as a period of 24 hours. This shift is split into on station hours and on call.
20. Currently the arrangement on all DC duty stations in the Service is for the hours of 12.00 hrs. - 22.00 hours to be on station, and the period 22.00 hrs. - 12.00 hours requested to be on call (as per the Grey Book).
21. The stand by period between 10.00 hrs - 12.00 hours is further sub classified as 'positive hours' to comply with point (2) of the Scheme of Conditions of Service of the Grey Book. Employees are required to respond to any emergency call received during this stand by period.
22. Existing arrangements require DC duty personnel to work four consecutive periods of duty followed by four days off (as per the Grey Book).

LEAVE ARRANGEMENTS FOR DAY CREWING

23. In line with National Joint Council (NJC) Grey Book conditions of service, and NWFRS procedures Watch Managers, Crew Managers and Firefighters are entitled to the following leave;

Scale A Leave	-	25 days (3 x blocks of 7 days, 1 x block of 4 days ie 16 duty days taken in 4 blocks)
Scale B Leave	-	5 days
Public Holiday Leave	-	8 days
*Long Service Leave	-	3 days
*Good Attendance leave	-	1 days (Awarded to approximately 50% of staff)

Long-Service leave applies to employees who, at the start of the leave year, have at least five years continuous full-time or part time service under this scheme of conditions of service

Good Attendance leave will be awarded to those staff who have not taken sick leave in the preceding 12-month period

RESILIENCE CAPACITY DAY CREWING

24. Staff are required to work an average of 182.5 shifts per year before any type of leave is allocated. This is calculated using the four days on four days off shift pattern
25. Currently across the Service there are 14 posts on each of the five DC duty stations making 70 posts in total.
26. The above provides the Service with 2100 available shifts per year on each of the five DC stations (150 shifts average for each of the 14 crew members after leave entitlement).
27. The current procedure to provide a ridership of five personnel per day 365 days per year equates to a requirement of 1825 full shifts per year to achieve 'optimal' crewing.
28. The above therefore leaves an initial surplus of 275 shifts per year on each of the five DC duty stations in the Service subject to conditions. This equates to 137.5 shifts per watch.
29. The table and information below describe the particulars of the above in more detail.

DAY CREW ESTABLISHMENT FIGURES & TABLE ALL STATIONS

Current Day Crew duty operating model			
Station	Fulltime Appliances	Posts	Roster Model
Colwyn Bay	1 WT	14	Current DC
Llandudno	1 WT	14	Current DC
Bangor	1 WT	14	Current DC
Caernarfon	1 WT	14	Current DC
Holyhead	1 WT	14	Current DC
Total Staff required		70	

DAY CREW STATION CALCULATIONS

30. After deductions for leave (32.5 days per year average) and taking account of the four days on four days off duty system in use, the Service have the following shifts available at each of the five DC stations.

14 personnel x 150 shifts per year (average)	=	2100 shifts per year available
5 posts per day 365 days per year required	=	1825 shifts per year needed
275 shifts initial spare capacity per year	=	15% resilience capacity
Current absence rate of all types (2023-2024)	=	8% absence**
275 shifts spare per year – 168 shifts absence	=	107 shifts spare capacity per year
14 posts with 5 training days per year	=	70 training days per year
		37 resilience shifts per station per year

185 total shifts per year across all DC stations enhancing resilience if shared

** 8% absence includes all planned or unplanned leave which includes short and long term sick, maternity leave, paternity leave, career breaks bereavement leave and jury duty**

WDS SHIFT DUTY SYSTEM OVERVIEW

31. The NWFRS WDS Shift Duty System is an NJC Grey Book agreed shift system based on personnel working all duty hours on station with no on call element. NWFRS have three stations with this duty system.
32. Deeside and Rhyl operate a four-watch system with seven posts on each watch
33. Wrexham operates a four-watch system with 13 posts on each watch
34. Existing arrangements on all three of the 24-hour on shift duty system stations require personnel to work two nine-hour day shifts followed by two 15-hour night shifts followed by four rota days.

The NJC Scheme of Conditions of Service (Grey Book) states:

The hours of duty of full-time employees on this system shall be an average of forty-two per week. The hours of duty of part time employees shall be pro rata. The rota will be based on the following principles:

- 1. Each period of twenty-four hours shall be divided into a day shift and a night shift.*
- 2. The night shift shall not be less than twelve hours.*
- 3. There shall be at least two complete periods of twenty-four hours free from duty each week.*
- 4. Leave days shall change week by week in a regular progressive manner.*
- 5. No rota system shall include continuous duty periods of twenty-four hours.*
- 6. Three hours shall be specified for meal breaks in every twenty-four hours. The timing of these periods is at the discretion of the authority. Account shall be taken of meal breaks interrupted by emergency calls.*

WORKING HOURS WDS SHIFT DUTY SYSTEM

35. Staff are required to work an average of 182.5 days per year, excluding annual leave entitlement as calculated by the four days on followed by four days off shift pattern.

36. One shift is currently classified as either one nine-hour day shift or one 15-hour night shift.
37. Existing arrangements require WDS shift duty system personnel work two consecutive nine-hour day shifts followed by two consecutive 15-hour night shifts followed by four days off.
38. In NWFRS the day shift start time is 0900 with the night shift start time being 1800.

LEAVE ARRANGMENTS FOR WDS SHIFT DUTY SYSTEM

39. In line with NJC Scheme of Conditions of Service, and NWFRS procedures Watch Managers, Crew Managers and Firefighters are entitled to the following leave each calendar year;

Scale A Leave	-	25 days (3 x blocks of 7 days, 1 x block of 4 days ie 16 duty days taken in 4 blocks)
Scale B Leave	-	5 days
Public Holiday Leave	-	8 days
*Long Service Leave	-	3 days
*Good Attendance leave	-	1 day (awarded to approximately 50% staff)

Long-Service leave applies to employees who, at the start of the leave year, have at least five years' continuous full-time or part-time service under this scheme of conditions of service

Good Attendance leave will be awarded to those staff who have not taken sick leave in the preceding 12-month period

RESILIENCE CAPACITY WDS SHIFT DUTY SYSTEM - RHYL AND DEESIDE

40. Staff are required to work an average of 182.5 days per year, before any type of leave is calculated. This is calculated using the four days on four days off shift pattern
41. 28 posts are based at Deeside Fire Stations and 28 posts at Rhyl Fire Station.

42. Rhyl and Deeside Fire Stations operate a four-watch system with seven posts on each watch.
43. The above provides the Service with 4200 available shifts per year at Deeside and 4200 available shifts at Rhyl (150 average shifts for each of the 28 crew members after leave entitlement).
44. The current procedure to provide a ridership of five personnel 365 days per year across both day and night shifts requires 3650 full shifts per year (1825 day & 1825 night).
45. The above therefore leaves an initial surplus of 550 shifts per year at both Deeside Fire Station and Rhyl Fire Stations subject to conditions. This equates to 137.5 shifts per watch
46. The table below and associated information below show the particulars of the above in detail.

WDS SHIFT DUTY SYSTEM ESTABLISHMENT TABLE & FIGURES RHYL/DEESIDE

Current 24-hour on Shift operating model Deeside and Rhyl			
Station	Fulltime Appliances	Posts	Roster Model
Deeside	1 W/T	28	Current WDS Shift Duty System
Rhyl	1 W/T	28	Current WDS Shift Duty System
Total Staff required		56	

WDS SHIFT DUTY SYSTEM FIGURES RHYL/DEESIDE

47. After deductions for leave (32.5 days per year average) and taking account of the four days on four days off duty system in use, the Service have the following shifts available at Deeside and Rhyl.

28 posts x 150 duty shifts per year average	=	4200 shifts per year available
5 posts per shift 365 days per year x2	=	3650 shifts per year needed
550 shifts initial spare capacity per year	=	15% resilience capacity
Current absence rate of all types (2023-2024)	=	8% absence
550 shifts per year – 336 shifts absence	=	214 shifts spare capacity per year
28 posts with 5 training days per year	=	140 training days per year
		74 resilience shifts per station per year

****494** total resilience shifts per year across three WDS Shift Duty System stations enhancing resilience if shared*

****** 8% absence includes all planned or unplanned leave which includes short and long term sick, maternity leave, paternity leave, career breaks bereavement leave and jury duty******

RESILIENCE CAPACITY WDS SHIFT DUTY SYSTEM - WREXHAM

45. Staff are required to work an average of 182.5 shifts per year, before any type of leave is calculated. This is calculated using the four days on four days off shift pattern
46. 52 posts are based at Wrexham Fire Station.
47. Wrexham Fire Station operates a four-watch system with 13 posts on each watch.
48. The above provides the Service with 7800 available shifts per year (150 shifts average for each of the 52-crew member after leave entitlement).
49. The current procedure to provide a ridership of 9 personnel 365 days per year across both day and night shifts requires 6570 full shifts per year (3285-day shifts and 3285-night shifts).
50. The above therefore leaves an initial surplus of 1230 spare shifts per year subject to conditions.
51. The table below and associated information show the particulars of the above in more detail.

WDS SHIFT DUTY SYSTEM TABLE AND FIGURES - WREXHAM

Current 24-hour on Shift operating model Wrexham			
Station	Fulltime Appliances	Posts	Roster Model
Wrexham	2 WT	52	Current WDS Shift Duty System
Total Staff required		52	

WDS SHIFT DUTY SYSTEM RESILIENCE LEVELS WREXHAM

52 posts x 150 duty shifts per year average	=	7800 shifts per year available
9 posts per day 365 days per year x 2	=	6570 shifts per year needed
1230 shifts initial spare capacity per year	=	18.5% resilience capacity
Current absence rate of all types (2023-2024)	=	8% absence **
1230 shifts per year – 624 shifts absence	=	606 shifts spare capacity per year
52 posts with 5 training days per year	=	260 training days per year

**346 surplus shifts per year

**494 total resilience shifts per year across three 24-hour duty shift stations enhancing resilience if shared*

** 8% absence includes all planned or unplanned leave which includes short and long term sick, maternity leave, paternity leave, career breaks bereavement leave and jury duty**

CONCLUSION

The above figures illustrate that there are 679 total surplus shifts across the 24 hour on shift duty system and DC duty systems and demonstrate a 'proof of concept' that the existing duty systems and establishment of 178 personnel on the eight existing wholetime stations provide sufficient resilience to cover all crewing deficiencies, whilst at the same time allowing leave of all types to be accommodated. Furthermore, this will also provide sufficient resilience capacity for personnel to be rostered from the rota by the Training and Development Department for five days per year to undertake training and development courses whilst on duty.

The successful implementation of this collective agreement will allow NWFRS to trial other proposals for effective emergency cover across the whole of North Wales.

ENHANCING RESILIENCE CAPACITY

Alignment of promotion process with the leave year

53. Existing arrangements result in the annual supervisory promotion process taking place after leave requests for the upcoming year have been requested and accepted. This process ordinarily takes place between the months of January and March each year, typically involving all roles from Area Manager to Firefighter.

- 54. The promotion process invariably results in personnel being moved stations and/or Watch`s, in some cases involuntarily meaning that leave clashes become inevitable.
- 55. In these circumstances leave is often honoured, frequently resulting in deficiencies that are then back filled with overtime payments to other staff.
- 56. By aligning the promotion process and undertaking it prior to leave requests being made this will avoid the existing clashes and free up resilience capacity.

Undertaking training days or other Service activities on rota days

- 57. Existing arrangements require personnel to attend several training days per year often on rota days. This rota day training is remunerated at a rate of time and a half. This is broken down into a Training Compensatory day (TC) day plus 50% Time in Lieu (TIL).
- 58. The above arrangement has resulted in a significant accumulation of TIL across Service personnel as well as an accumulation of TC days, both of which must be accommodated and therefore leave Watch`s short with the deficiency being back filled with overtime payments to other staff.
- 59. Under this agreement most training and development courses will be taken on duty days. Any training days worked on rota days must be taken as overtime and not TC/TIL.
- 60. Personnel attending other authorised Service activities on rota days such as staff network, groups and forums must take time accrued as overtime and not TIL.

Shift start times

- 61. Existing arrangements for personnel are such that differing duty systems start their shifts at different times. This creates a barrier for resilience as crew members from a Day-crewing duty system stations are unable to be detached to cover at a WDS Shift Duty System station and vice versa.
- 62. The above often results in a Day-crewing stations for example having `spare capacity` i.e. six or seven personnel on duty on a given day but being unable to release that capacity to a WDS Shift Duty System station. The deficiency is therefore backfilled with overtime payments to other staff.

63. Aligning shift patterns to a universal start time will free up resilience capacity as it will allow personnel to cover deficiencies across a broader span of stations and avoid any remedial actions that might impact on taking leave or riding below the optimum crewing level of five.
64. Under this agreement and it's pilot the existing WDS shift and Day-crewing duty systems start and finish times will align as shown below from 1st September 2025 and through to the first full 12 months of the pilot (1st January 2026 to 31st December 2026).

Start and finish times at existing WDS stations under this agreement			
Station	Day Shift	Night shift	Positive hours
Rhyl, Deeside, Wrexham	08.00 – 18.00	18.00 – 08.00	N/A
Caernarfon, Bangor, Holyhead, Llandudno, Colwyn Bay	08.00 – 18.00	N/A	** Locally agreed**

****By local agreement each day crewed station can serve the two additional positive hours required each day on either side of the time required on station or as an hour either side of the shift time**.**

Quarterly reviews will allow for feedback from all parties with regards to the impact of the changes.

65. Pilot Evaluation

After the pilot period has ended (31st December 2026) those responsible for the monitoring of this collective agreement will conduct its evaluation to determine a permanent way forward. During this evaluation period this collective agreement will continue to operate.

Approval of leave

66. Existing rostering protocols provide the Service with procedures whereby a large proportion of in year crewing deficiencies, (either through long term or short-term sickness) can be covered through detachments, resilience cover or through more robust approval of `non-primary` leave i.e. Bank Holiday (BH) and Time in Lieu
67. The approval of leave will be defined within an updated whole-time rostering policy and procedure which will follow existing processes of consultation.

Redistribution of leave (2026 leave year onwards)

68. Existing leave protocols allow for two personnel to be off on annual leave (AL) at any one time aside from a designated resilience week where it is one. This respective arrangement is four at Wrexham and three on designated resilience weeks.
69. The above arrangement results in no resilience capacity being available during some months. By redistributing Statutory Annual Leave equally through the year and the introduction of a revised Rostering Policy, *this will more evenly distribute resilience capacity across the year.*

Existing resilience cover

70. Existing resilience procedures stipulate that it can only be used to cover short term sickness absences i.e. less than 16 days meaning that if capacity exists it cannot be utilised as the station in question is not obliged to release that crew member if they choose to take leave. Under this collective agreement the 16 day `rule` will be reviewed, with new parameters, allowing resilience to be used to cover a wider range of crewing deficiencies.
71. It is anticipated that improving the capacity of resilience, will improve whole-time station crewing shortfalls. In order to achieve this, we will agree in social partnership a new whole-time rostering policy which will look to make improvements on crewing deficiencies, resilience arrangements and distribution of leave.
72. This agreement moves to allowing resilience to be used to cover a wider range of crewing deficiencies. Allowing resilience to be used to cover a wider range of crewing deficiencies will increase the resilience capacity of existing station duty systems.

Amendment of wholetime rostering guidance

73. For the above to be achievable then any ambiguity needs to be removed from the Rostering Policy and accompanying documents to provide clarity for all managers and personnel. To do this there will be a requirement for these documents to be revised ahead of the commencement date (1st September 2025). Any revision would be subject to agreement in social partnership.

This local Collective Agreement will form part of the contract of employment through mutual agreement for those personnel employed on Wholetime Day Crew and Wholetime Duty on Shift stations in NWFRS. The undersigned parties have committed to this collective agreement.

Signed


Date

On behalf of the FBU

Signed

Date

on behalf of North Wales Fire and Rescue Service

Report to	North Wales Fire and Rescue Authority	
Date	21 July 2025	
Lead Officer	Elgan Roberts, Head of Finance and Procurement	
Contact Officer	Elgan Roberts, Head of Finance and Procurement	
Subject	Draft Statement of Accounts 2024-25	

PURPOSE OF REPORT

- 1 To present the unaudited Statement of Accounts for 2024/25, encompassing the revenue and capital outturn, the balance sheet position, and key financial movements for North Wales Fire and Rescue Authority (the Authority).
- 2 To seek delegated authority for the approval of the final audited Statement of Accounts to the Executive Panel at its meeting scheduled for 15 September 2025.

EXECUTIVE SUMMARY

- 3 The Authority has maintained a strong financial position despite ongoing pressures. The 2024/25 revenue outturn shows a surplus of £293k, with usable reserves increasing to £10.879m. The full accounts including the narrative report are included within Appendix i.
- 4 Capital expenditure totalled £3.087m, with £2.589m carried forward. The accounts incorporate the adoption of IFRS 16 and continued investment in sustainability, training infrastructure, and operational resilience.
- 5 The report also includes the response provided to Audit Wales following enquiries in relation to the governance arrangements relevant to the Statement of Account, attached as Appendix ii.

OBSERVATIONS FROM AUDIT COMMITTEE

- 6 The report was presented to the Audit Committee on 16 June 2025, where Members noted its contents and formally endorsed. A specific query was raised regarding the adequacy of reserves and whether they were sufficient to mitigate risks. It was confirmed that, in principle, usable reserves could be applied to offset one-off costs associated with the levy; however, this remains contingent on the level of activity remaining constant.
- 7 Appreciation was expressed by both the Chair and the Section 151 Officer for the considerable effort involved in publishing the accounts by the statutory deadline of the end of May.

RECOMMENDATIONS

8 It is recommended that Members:

- i) Approve the unaudited revenue and capital outturn position;**
- ii) Approve the unaudited balance sheet position;**
- iii) Approve the movement to and from reserves; and**
- iv) Approve the delegation of authority for the approval of the audited Statement of Accounts to the Executive Panel.**

BACKGROUND

- 9 The Accounts and Audit (Wales) Regulations 2014 require the Authority to prepare and publish a statement of accounts on an annual basis. The pre-Covid timescales prescribed within the Regulations require a draft statement of accounts to be issued by 31 May, with an audit deadline of 31 July each year.
- 10 The Welsh Government, following consultation with the Society of Welsh Treasurers and Audit Wales, confirmed that the draft statement of accounts for 2024/25 should be prepared no later than 30 June 2025, and that the statement of accounts should be audited by the 31 October 2025.
- 11 The draft Statement of Accounts were certified by the Authority's Treasurer on 30 May 2025 and the external audit by Audit Wales is currently in progress. Following the conclusion of the audit the accounts will be presented to the full Fire Authority for final approval.

INFORMATION

- 12 The Statement of Accounts has been prepared in accordance with CIPFA's Code of Practice and provides a comprehensive overview of the Authority's financial performance and position for the year ended 31 March 2025.
- 13 It also includes a Narrative Report, which outlines the Authority's operational context, strategic priorities, and key achievements. The purpose of the Narrative Report is to help stakeholders understand the financial statements and the broader environment in which the Authority operates.
- 14 The Statement of Accounts confirms that the year-end balance of usable reserves is £10.879m (Note 8, page 36) which includes the surplus of £0.293m on the general fund and increases of £1.540m in earmarked reserves.

IMPLICATIONS

Wellbeing Objectives	This report links to the Authority's long-term well-being objectives. Funding for the Service benefits the communities of North Wales and ensures there is sufficient investment in infrastructure to enable the service to provide emergency responses and prevention work well in to the future.
Budget	Budget is set annually in accordance with the proposed service delivery which includes emergency response and prevention work.
Legal	It is a legal requirement that the Authority produces the Statement of Accounts in accordance with the prescribed standards.
Staffing	Effective financial management supports the long-term workforce strategy to ensure that the Authority is able to discharge its responsibilities
Equalities/ Human Rights/Welsh Language	None
Risks and Uncertainties	Income and expenditure are closely monitored to ensure that deviations from the approved budget are properly identified and reported to Members.

Statement of Accounts

2024-2025



Gwasanaeth Tân ac Achub
Fire and Rescue Service



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The maintenance and integrity of the Authority's website is the responsibility of the Authority; the work carried out by auditors does not involve consideration of these matters and accordingly auditors accept no responsibility for any changes that may have occurred to the financial statements since they were initially presented on the website.

Narrative Report

The Statement of Accounts has been prepared in accordance with the requirements of the Chartered Institute of Public Finance and Accountancy (CIPFA). It therefore aims to provide information so that members of the public and residents of North Wales, Fire and Rescue Authority Members, partners, stakeholders, and other interested parties can:

- Understand the overall financial position of the Authority and the outturn position for 2024/25;
- Have confidence that the public money with which the Authority has been entrusted has been used and accounted for in an appropriate manner; and
- Be assured that the financial position of the Authority is sound and secure.

The style and format of the accounts comply with CIPFA standards. The information contained within these accounts is presented as simply and clearly as possible. However, the accounts of an organisation such as North Wales Fire and Rescue Authority are, by their nature, both technical and complex.

The Statement of Accounts includes the core financial statements, which are: -

The Comprehensive Income and Expenditure Statement (CIES) – shows the accounting cost in the year of providing services, in accordance with generally accepted accounting practices, rather than the amount to be funded from taxation.

Expenditure and Funding Analysis (EFA) – shows the information in the CIES but also provides the accounting adjustments which are cancelled out in Note 7 to ensure that these adjustments are not funded by Taxpayers.

The Movement in Reserves Statement (MIRS) – shows the movement in the year of reserves held by the Authority, analysed between 'usable' and 'unusable' reserves. The statement shows the true economic cost of providing the Authority's services and how those costs are funded from the various reserves.

The Balance Sheet – shows the value as of the Balance Sheet date of the assets and liabilities recognised by the Authority. The net assets are matched by reserves held by the Authority.

The Cash Flow Statement – shows the changes in cash and cash equivalents of the Authority during the reporting period.

Foreword from the Chair

As Chair of North Wales Fire and Rescue Authority, I am pleased to present the Statement of Accounts for 2024/25. Despite ongoing financial challenges, I am incredibly proud of how the Service, supported by the Authority, has managed to serve our communities effectively while maintaining financial stability.

The Authority remains dedicated to ensuring an efficient and effective fire service that aligns with our mission: *making North Wales a safe place to live, work and visit*. Achieving this requires not only balancing the budget for the current year but also planning for a sustainable financial future. A critical part of this strategy is investing in assets that will support both the Service and the community for years to come.

While the financial outlook for the future remains challenging, I am confident that the strong financial position we've maintained will enable us to navigate these challenges successfully.

Councillor Dylan Rees

Chair of North Wales Fire and Rescue Authority



Introduction from Dawn Docx, Chief Fire Officer

This Narrative Statement is intended to provide readers with a clearer understanding of the Fire and Rescue Authority, its operating environment, and to help interpret the accompanying Statement of Accounts.

In addition to financial information, the Narrative Statement offers insights into the Authority's operational activities, strategic initiatives, and performance metrics. This comprehensive overview helps readers appreciate the broader context in which the Authority operates.

While the accounts themselves are complex and technical, I encourage you to take the time to review them, along with this Narrative Statement, which provides a detailed overview of the financial year and the financial position of the Fire and Rescue Authority as of 31 March 2025. If you require further information or have any questions about the accounts, contact details are provided within this Narrative Statement.

Dawn Docx

Chief Fire Officer



Introduction to North Wales Fire and Rescue Authority

These accounts cover the year to 31 March 2025 for the North Wales Fire and Rescue Authority. The Authority covers the whole of the geographic area of 2,400 square miles with an estimated population of approximately 700,000 people. There are 44 fire stations in North Wales – 8 full-time and 36 on-call stations.

In addition to emergency response, the Authority is committed to community safety and fire prevention. We collaborate with local schools, businesses, and community groups to deliver educational programs and safety campaigns.

The Authority comprises 28 elected councillors from the six unitary authorities of North Wales, with the number of representatives determined by the population of the constituent Council's area. More information about the Authority, its members and responsibilities can be found [here](#).

North Wales Fire and Rescue Service is led by a Chief Fire Officer and the Service Leadership Team. This comprises Senior Officers and Managers who are responsible for departments looking after our Service's key operational and corporate functions.

Our principles

At NWFRS, we are guided by our principles that shape our actions and decisions. These are:







These principles help us deliver high-quality services and maintain the trust and safety of the communities we serve.

About Our Service Area



Resources

 44 fire stations
 54 front line fire appliances
 43 special appliances including rescue boats and aerial ladder platforms
 878 staff of which 29% are fluent welsh speakers

Prevention and Protection activities

 20,021 safe and well checks completed
 320 business audits conducted
 133 safety talks with 11,563 children and young people
 22 phoenix courses with 203 participants completing the programme

Responding activities

 14,530 emergency calls handled
 Attended 6,485 emergency incidents
 1,801 fires attended of which 43 were wildfires
 3,263 false alarms

Governance

In the financial year 2024/25, we focused on making our operations transparent, accountable, and efficient. Our governance framework helps us make decisions, manage risks, and monitor performance.

Key Governance Developments

This year, we made important changes to our governance:

- **Governance Structure Review:** We reviewed and updated our governance structure to meet our needs better. This included updating the roles and responsibilities of key committees.
- **Risk Management:** We improved our risk management by including risk assessments in our planning and decision-making processes.
- **Internal audit:** 2024/25 was the second year of a three-year internal audit plan to review our internal controls and ensure we follow established policies and procedures.

Annual Governance Statement

The annual governance statement, which comes with the financial statements, gives a detailed account of our governance framework and its effectiveness during the year. It highlights key governance issues and the steps we took to improve governance practices.

Future Governance Initiatives

Looking ahead, we are committed to continuously improving our governance. Key initiatives for the next financial year include:

- **Training and Development:** We will provide ongoing training and development opportunities for members and officers to ensure they have the necessary skills and knowledge to fulfil their governance roles effectively.
- **Performance Monitoring:** We will enhance performance monitoring and reporting mechanisms to provide timely and accurate information on our performance against strategic objectives.

Service Leadership Team

The Service Leadership Team (SLT) structure includes the Chief Fire Officer and all the Assistant Chief Fire Officers. The rest of the SLT consists of Area Managers and Heads of Departments, ensuring a comprehensive and effective leadership framework.

Operating Model

The Fire Authority's operating model explains how we work to keep our communities safe. It shows how we use our resources, manage our services, and reach our goals.

Our main services include:

- **Emergency Response:** Quickly and effectively responding to fires, special service calls, and other incidents.
- **Prevention and Protection:** Promotion and education of fire safety, completing inspections, and enforcing rules to reduce risk.
- **Community Engagement:** Working with residents, businesses, and local groups to promote safety and preparedness.

We regularly check and adjust how we use our resources to make sure we are meeting our goals efficiently. This includes reviewing our budget, staffing, and equipment needs, as well as assessing our performance and impact.

Below is a map of all our facilities across North Wales.

Emergency Cover Review (ECR)

Following the Fire Authority's decision not to proceed with the original proposals (Option 1a as presented in December 2023), a new Emergency Cover Review (ECR) Task and Finish Group was established in January 2024.

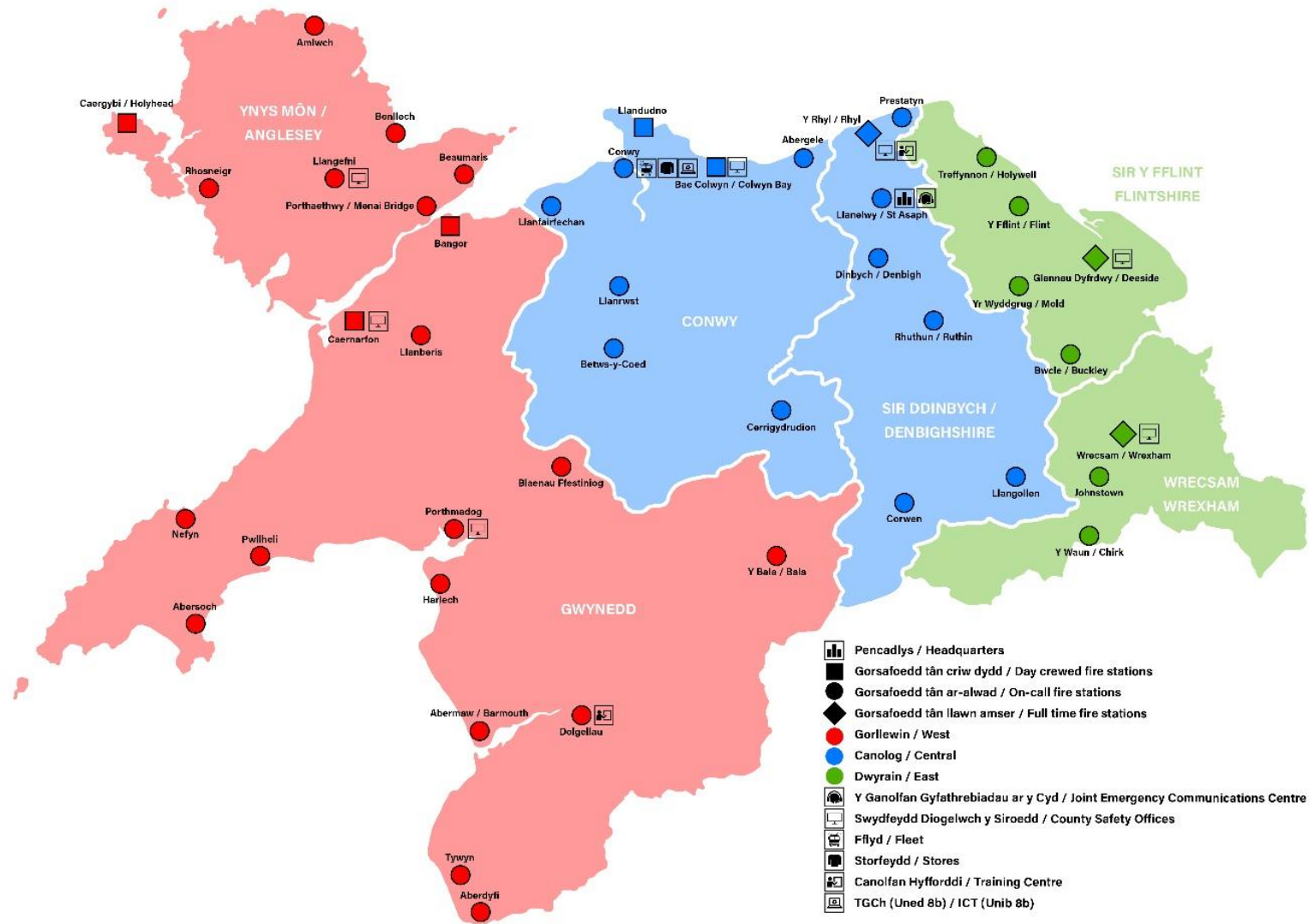
Throughout the year, the group has explored additional recommendations presented during the ECR to enhance the emergency response element of the operating model.

A key objective is to maximise the effectiveness and efficiency of existing shift patterns and pilot new models for wholetime firefighters to operate in key rural areas to strengthen fire cover.

A "Collective Agreement" has now been reached between the Chief Fire Officer and the Fire Brigades Union, setting out the broad principles of the proposed changes.

The service is now focused on developing and delivering an implementation plan, with key milestones agreed and workstreams underway.

NWFRS Facilities/Station Map



Community Risk Management Plan

This year marked the official close of the 2021–2024 Corporate Plan and the introduction of the new Community Risk Management Plan (CRMP), which reshapes how the Service identifies and manages risks across North Wales.

Following a public consultation, the Fire Authority published its new medium-term plan and objectives in July 2024. These are available [here](#).

The CRMP, which spans 2024 to 2029, outlines the key risks facing our communities and sets out how we will address them—while continuing to prevent and respond to fires and other emergencies.

To support the CRMP, we produce annual Community Risk Management Implementation Plans. The 2024–2025 plan, also published in July, is available [here](#). These implementation plans detail the specific actions we will take each year to achieve our goals and keep our communities safe. It also includes well-being and improvement objectives, in line with Welsh legislation.



Annual Performance

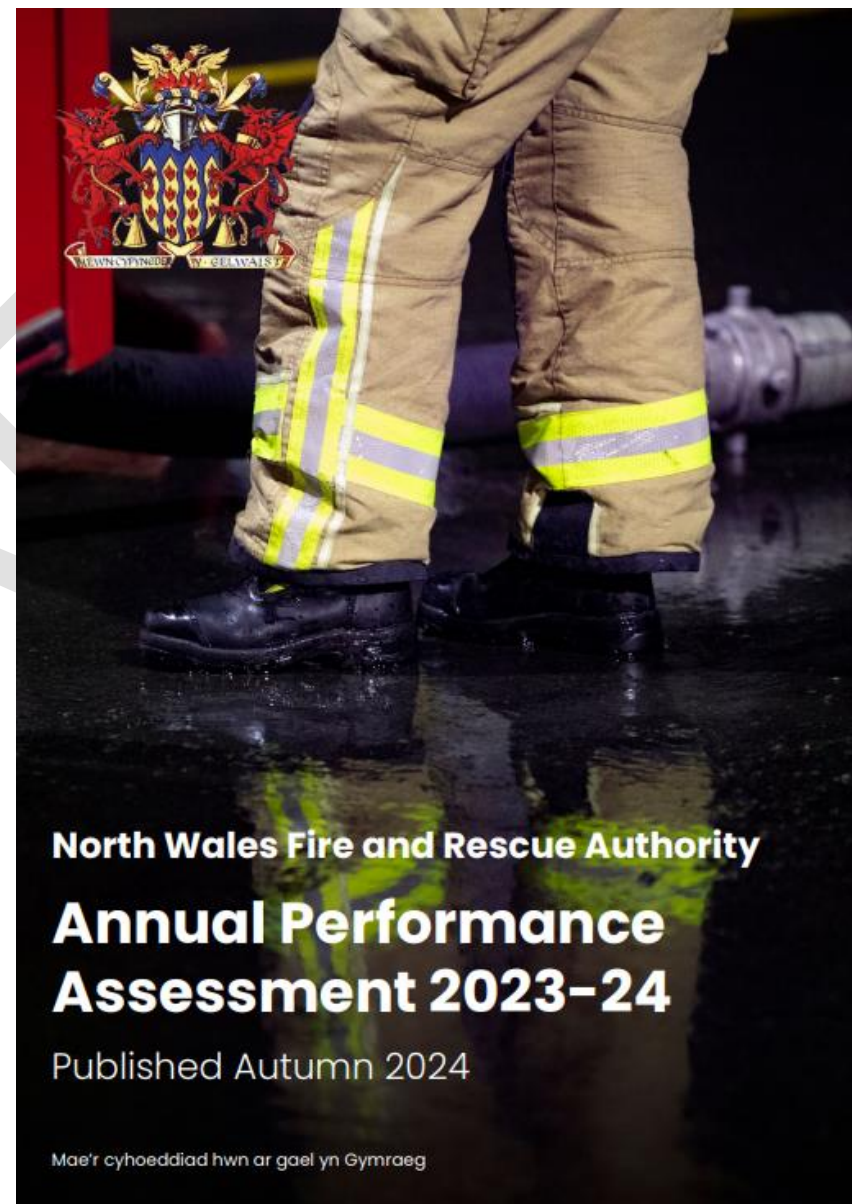
NWFRA's Annual Performance Assessment, published in October 2024, marked the final year of the three-year Corporate Plan. It reviewed performance against annual objectives and reflected on achievements across the plan's lifespan.

In addition to reporting on three statutory and sector-wide performance indicators, the report assessed progress against seven improvement and well-being objectives. These included enhancing community safety and resilience, improving environmental sustainability, and embedding social value in procurement.

The annual performance assessment also highlighted the Authority's commitment to workforce development, stakeholder engagement, and operational efficiency. A summary of performance data and the Dwelling Fire Response Charter for 2023/24 were also included.

The accompanying Annual Governance Statement (pending approval at the time of publication) outlines governance arrangements and sets out the work plan for 2024/25

The Annual Performance Assessment can be accessed [here](#).



Organisational Culture and Improvement

During 2024/25, the Authority published an Independent Cultural Review, jointly commissioned with Mid and West Wales Fire and Rescue Service.

Delivered by Crest Advisory and published in February 2025, the review involved surveys, interviews, focus groups, and site visits. It highlighted strengths in staff commitment and public service, while identifying areas for improvement in leadership visibility, communication, and accountability.

In response, the Service developed a Culture Improvement Plan shaped through staff workshops and aligned with the review's recommendations. Oversight of the plan is provided by the Service Leadership Team and the Cultural Board, which includes members of the leadership team, the Chair of the Authority, the EDI Member Champion, and a representative from Welsh Government. Progress is monitored through SMART objectives and regular reporting mechanisms.

Support has also been sought from Welsh Government to help implement the changes. The Authority remains committed to fostering a safe, inclusive, and values-led workplace.

Development of a new training centre

During 2024/25, the Authority made significant progress in advancing plans for a new fit for purpose fire and rescue training centre.

A strategic outline case was developed and formally approved by the Fire and Rescue Authority in October 2024. The project is being led by an Assistant Chief Fire Officer, with the Head of Training and Development overseeing operational delivery, supported by a project team.

Programme governance is supported by a structured framework that includes a programme board, programme group, subgroups, and task and finish groups. These groups include representation from staff, North Wales Police facilities team, Councillors, Trade Union representatives, and external consultants, ensuring broad engagement, transparency, and collaborative decision-making throughout the programme's development.

The new centre is a key component of the Authority's long-term strategy to enhance operational readiness, improve training capacity and efficiencies in training delivery, and support the delivery of the Community Risk Management Plan 2024–2029

Sustainability and climate change

In 2024/25, the Authority continued to implement its Environmental Strategy (2023–2030), focusing on decarbonisation across fleet, estates, and procurement. The Environment and Sustainability Working Group led the development of detailed plans to support the Service's Net Zero 2030 target.

A successful test of Hydrotreated Vegetable Oil (HVO) as a diesel alternative was completed, with a station-based trial now underway. Plans are in place to install HVO tanks and dispensing equipment at twenty sites.

Progress continued on a bespoke Environmental Management System aligned with ISO 14001, aimed at improving environmental performance through better resource use and waste reduction. Implementation is expected to begin in 2026/27.

Working with the Welsh Government Energy Service, a heating decarbonisation plan was developed to guide a rolling programme of system replacements, prioritised by funding and operational need. Initial installations are planned for Llandudno and Conwy fire stations.

A grant of £295k was received by the Low Carbon Heat Team at the Welsh Government Energy Service to fund 90% of the cost of installing a low carbon heating system at Llandudno Fire Station, with the remaining 10% met from the Authority's

capital budget. An additional £131k was secured through the Electric Vehicle Charging Infrastructure (EVCI) grant, covering 75% of the total cost associated with the procurement and installation of vehicle charging infrastructure.

During 2024/25, the Authority secured £492k in capital funding from Welsh Government, of which £117k was allocated to sustainability initiatives, including the purchase of two electric cars and two electric vans.



Financial Performance

The Authority remains committed to delivering high-quality fire prevention, enforcement, and emergency response services. In 2024/25, the Authority continued to navigate a challenging financial landscape, balancing rising costs with the need to maintain operational effectiveness and community safety.

To support long-term sustainability, Members reaffirmed the Medium-Term Financial Strategy and agreed to increase the contributions from the constituent authorities by 8.9% to £48,322k, alongside the planned use of earmarked reserves and non-recurring measures to maintain service delivery.

Recruitment challenges persisted, particularly in specialist and retained roles, though progress was made in implementing workforce recommendations and aligning with national discussions on terms and conditions. Work also continued on developing a revised Emergency Cover model, following the 2023 consultation.

Despite ongoing pressures, the Authority maintained financial stability through careful budget monitoring, vacancy management, and in-year income generation. Looking ahead, the Authority remains focused on managing pension and payroll costs, while ensuring that financial decisions continue to support operational resilience and strategic priorities.

Revenue Performance

The Authority reported a surplus of £293k for 2024/25 after applying statutory accounting adjustments and transfers to reserves. This compares to an outturn forecast of £330k at the end of March.

Usable reserves increased by £1,785k during the year, bringing the total to £10,879k. These reserves have been set aside to support ongoing service requirements, including anticipated insurance claims and the replacement of fire kit. It is anticipated that reserve levels will reduce in future years as these commitments are met. Further details are provided in Note 8 of the Statement of Accounts.

IFRS 16 Adoption

As part of changes introduced under IFRS 16, the Authority has recognised most lease agreements—such as for vehicles and equipment—as assets and liabilities on the balance sheet. This change improves transparency by showing the full value of leased assets and the Authority's long-term financial commitments, rather than just annual lease payments. The value of assets recognised totalled £903k.

Revenue Summary

2024/25	Budget (£'000)	Outturn (£'000)	Reserves (£'000)	CERA (£'000)	Total (£'000)	Variance (£000)	Variance (%)
Employees	35,430	33,937	525	0	34,462	(968)	-2.7%
Premises	3,530	2,921	317	0	3,238	(292)	-8.3%
Transport	1,259	1,085	102	0	1,187	(72)	-5.7%
Supplies	6,622	6,305	596	0	6,901	279	4.2%
Third Party Payments	363	385	0	0	385	23	6.2%
Capital Finance & Charges	2,989	2,397	0	1,459	3,856	866	29%
Income	(946)	(1,774)	0	0	(1,774)	(828)	87%
Use of Reserves	(924)	0	0	0	0	924	-100%
Sub Total	48,322	45,257	1,540	1,459	48,256	(65)	-0.1%
Levies	(48,322)	(48,549)	0	0	(48,549)	(227)	0.5%
Outturn Position					(293)	(293)	0.6%

Usable Reserves

Usable Reserves	Balance 31 March 2024	Transfers (in/)/out 2024/25	Balance 31 March 2025
	£'000	£'000	£'000
Earmarked Reserves	(7,398)	(1,540)	(8,938)
General Fund	(1,575)	(293)	(1,868)
Capital Grants Unapplied	(48)	48	0
Capital Receipts Reserve	(73)	0	(73)
Total Usable Reserves	(9,094)	(1,785)	(10,879)

Capital Performance

The Authority approved a capital programme of £5,676k in January 2024, of which £1,110k was rollover funding from 2023/24. Capital expenditure for 2024/25 totalled £3,087k, with detailed breakdown of the schemes seen below. Included was the land purchase of £2,714k, which formed a key part of the Authority's long-term asset strategy.

Due to project slippage, approximately £2,589k will be carried forward into 2025/26 to complete ongoing schemes. The Authority continues to monitor capital delivery closely, with improved scrutiny and planning processes now in place.

Capital Funding

During the year, the Authority also received capital grant funding from Welsh Government to support key operational improvements. This included funding for the replacement of fireground radios in line with recommendations from the Grenfell Tower Inquiry, and for the purchase of new vehicles to support frontline service delivery. These investments contribute to both firefighter safety and the Authority's long-term asset resilience.

Funding	Amount £000
Internal Borrowing	710
Grant Funding	918
Contributions	1,459
Total	3,087

Scheme	Allocation £'000	Actual £'000	Rollover £'000
ICT upgrades	827	377	450
Training towers	305	34	271
Station improvements	1100	394	706
Sustainability works	470	0	470
Training Facilities upgrade	300	0	300
Fire Appliances	427	534	0
Light Vehicles	166	194	0
Specialist Light Vehicles	632	570	0
Operational Equipment	290	0	242
Fleet Equipment	50	0	0
Rollover 2023/24			
Fire Appliances	960	984	0
Sustainability works	150	0	150
Total	5,676	3,087	2,589
Land Purchase	3,000	2,714	0
Grant Funding	918	1,012	0

In addition to the capital allocation, supplementary funding of £918k was received from various bodies, with £1,012k spent—primarily on sustainability initiatives. This reflects a prioritisation of grant-funded schemes.

A rollover of £2,589k is required to support the completion of ongoing projects, as outlined above.

Treasury Management

The Authority remained compliant with its Treasury Management Strategy throughout 2024/25. Borrowing and investments stayed within approved limits, and no defaults were reported. Investment income exceeded budget expectations, and the Authority's net borrowing position at year-end was £19,070k below the Capital Financing Requirement.

The Authority continues to work with a Treasury Advisor, Arlingclose, to plan and manage interest rate risk and borrowing strategy effectively.

Pension Costs

Employer contributions to the Firefighters' Pension Scheme totalled £4,906k, with total payments to retired members amounting to £9,737k. The scheme remains unfunded, with the liability decreasing to £208,143k driven by actuarial gains from changes in financial assumptions.

For the Local Government Pension Scheme, the employer's primary rate remained at 18.3%, and the same secondary rate reduction of £525k continued to be applied.

Outlook

Cashflow and Future Considerations

The Authority maintained a strong cash position throughout 2024/25, supported by timely receipt of precepts and active treasury management.

Looking ahead, future cashflows may be affected by the timing of capital projects—particularly the Training Centre development. The Authority continues to monitor liquidity closely, using short-term investments and scenario planning to ensure sufficient flexibility to meet operational and capital commitments. Specialist advice is provided by Arlingclose, supporting the Authority's approach to prudent and informed treasury decision-making.

Key Commitments

The Authority approved an allocation of £2,940k to support the development of proposals for a new centralised training centre, with funding phased through to 2026/27.

Future Budget Pressures and Mitigation

The Authority continues to face rising cost pressures and demand on services. The 2025/26 budget was approved by the Authority during the year, and work is ongoing to manage future shortfalls through efficiency savings, service prioritisation, and careful use of reserves.

Consideration of Section 114

The Authority reviewed updated guidance from the CIPFA regarding issuing a Section 114 notice — when a Treasurer notifies an authority that they are heading for a breach of the legal requirement to balance their revenue budget. Despite the financial pressures facing the wider public sector, the Authority maintained strong financial oversight throughout the year, including regular monitoring of budgets, reserves, and emerging risks.

At no point was a Section 114 notice considered necessary. This reflects the Authority's commitment to sound financial management and its proactive approach to protecting public services and ensuring long-term sustainability.

Further Information

Additional information about these accounts is available from Elgan Roberts, Head of Finance and Procurement for North Wales Fire and Rescue Service, Headquarters, Ffordd Salesbury, St Asaph, LL17 0JJ.

Interested members of the public have a statutory right to inspect the accounts before the audit is completed.

At the appropriate time, availability of the accounts for inspection is advertised on the website for North Wales Fire and Rescue Authority

www.northwalesfire.gov.wales/fire-and-rescue-authority/financial/

Acknowledgements

In closing, I would like to express my sincere thanks to colleagues across the organisation who have contributed to the preparation of this narrative report and the wider Statement of Accounts. In particular, I wish to acknowledge the dedication and professionalism of the Finance team, whose efforts have ensured the timely and accurate completion of this year's financial reporting.

We also remain grateful to our partners and stakeholders for their continued support and collaboration throughout 2024/25.

Dafydd Edwards

**Treasurer and Section 151 Officer
North Wales Fire and Rescue Authority**

STATEMENT OF RESPONSIBILITIES FOR THE STATEMENT OF ACCOUNTS

THE AUTHORITY'S RESPONSIBILITIES

The Authority is required:

- to make arrangements for the proper administration of its financial affairs and to secure that one of its officers has the responsibility for the administration of those affairs. In this Authority, that officer is the Treasurer.
- to manage its affairs to secure economic, efficient and effective use of resources and to safeguard its assets.
- to approve the Statement of Accounts.

AUTHORITY'S CERTIFICATE

I approve the Statement of Accounts of North Wales Fire and Rescue Authority as at 31 March 2025.

Signed: _____

Dated: _____

Chairman, North Wales Fire and Rescue Authority

THE TREASURER'S RESPONSIBILITIES

The Treasurer is responsible for the preparation of the Authority's Statement of Accounts in accordance with proper practices as set out in the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom (the Code).

In preparing the Statement of Accounts, the Treasurer has:

- selected suitable accounting policies and then applied them consistently.
- made judgements and estimates that were reasonable and prudent.
- complied with the Code of Practice.
- kept proper accounting records which were up-to-date.
- taken reasonable steps for the prevention and detection of fraud and other irregularities.

TREASURER'S CERTIFICATE

I certify that the Statement of Accounts has been prepared in accordance with the arrangements set out above, and presents a true and fair view of the financial position of North Wales Fire and Rescue Authority as at 31 March 2025 and the Authority's income and expenditure for the year then ended.

Signed: Ad Edwards

Dated: 30-05-2025

Treasurer, North Wales Fire and Rescue Authority

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EXPENDITURE AND FUNDING ANALYSIS

This statement shows how annual expenditure is used and funded from resources (grants, contributions etc.) by local authorities compared to resources consumed or earned by authorities in accordance with generally accepted accounting practices. It also shows how this expenditure is allocated for decision making purposes according to the type of expenditure incurred. Income and Expenditure accounted for under generally accepted accounting practices (GAAP) is presented more fully in the Comprehensive Income and Expenditure Statement.

2023/24				2024/25		
Net Expenditure Chargeable to the General Fund £'000	Adjustments Between the Funding and Accounting Basis £'000	Net Expenditure in the Comprehensive Income & Exp Statement £'000		Net Expenditure Chargeable to the General Fund £'000	Adjustments Between the funding and Accounting Basis £'000	Net Expenditure in the Comprehensive Income & Exp Statement £'000
43,123 (44,394)	(7,682) 10,557	35,441 (33,837)	Provision of Fire and Rescue Services	46,716 (48,549)	(9,309) 10,318	37,407 (38,231)
(1,271)	2,875	1,604	Deficit or (Surplus) on Provision of Services	(1,833)	1,009	(824)

2023/24				2024/25		
General Fund Balance £'000	Earmarked General Fund Reserves £'000	Total General Fund £'000		General Fund Balance £'000	Earmarked General Fund Reserves £'000	Total General Fund £'000
(1,480) (1,271)	(6,341)	(7,821) (1,271)	Brought Forward (Surplus)/Deficit on Provision of Services	(1,575) (1,833)	(7,519)	(9,094) (1,833)
	37	37	Transfer between General Fund Balance and Capital Grants Unapplied		48	48
1,176	(1,215)	(39)	Transfer between General Fund Balance and Earmarked General Fund Reserves	1,540	(1,540)	0
(1,575)	(7,519)	(9,094)	Closing General Fund Balance	(1,868)	(9,011)	(10,879)

COMPREHENSIVE INCOME AND EXPENDITURE STATEMENT

This statement shows the accounting cost in the year of providing services in accordance with GAAP, rather than the amount to be funded from contributions. The Authority's expenditure is funded by contributions from the six Local Authorities in North Wales in accordance with regulations; this may be different from the accounting cost. The contribution position is shown in the Movement in Reserves Statement.

2023/24				2024/25			
Gross Expenditure £'000	Gross Income £'000	Net Expenditure £'000		Note	Gross Expenditure £'000	Gross Income £'000	Net Expenditure £'000
36,878	(1,437)	35,441	Provision of Fire and Rescue Services		39,181	(1,774)	37,407
36,878	(1,437)	35,441	Cost of Services		39,181	(1,774)	37,407
(14)	0	(14)	Other Operating Expenditure		56	0	56
11,071	(429)	10,642	Financing & Investment Income & Expenditure	9	11,362	(182)	11,180
0	(44,465)	(44,465)	Taxation and Non Specific Grant Income	10	0	(49,467)	(49,467)
		1,604	(Surplus)/Deficit on Provision of Services				(824)
557	0	557	(Surplus) or Deficit on Revaluation of Property, Plant & Equipment Assets	18	0	0	0
		1,096	Remeasurement of the Net Defined Benefit Liability	18			(26,136)
		1,653	Other Comprehensive (Income) & Expenditure				(26,136)
		3,257	Total Comprehensive (Income) & Expenditure				(26,960)

MOVEMENT IN RESERVES STATEMENT

This statement shows the movement in the year on the different reserves held by the Authority, analysed into 'usable reserves' (i.e. those that can be applied to fund expenditure or reduce contributions from the Constituent Authorities) and other reserves. The Surplus or (Deficit) on the Provision of Services line shows the true economic cost of providing the Authority's services, more details of which are shown in the Comprehensive Income and Expenditure Statement. These are different from the statutory amounts required to be charged to the General Fund Balance which is funded by contributions from the six Constituent Authorities. The Net Increase / Decrease before Transfers to Earmarked Reserves line shows the statutory General Fund Balance before any discretionary transfers to or from earmarked reserves undertaken by the Authority.

The movements in 'Unusable Reserves' in local government accounting are notional, primarily reflecting changes in asset valuation (like buildings or pension liabilities). These are figures on paper, rather than 'cash backed', and cannot be spent on services.

2024/25	Note	General Fund Balance £'000	Earmarked and Grant Reserves £'000	Capital Grants Unapplied £'000	Earmarked Capital Receipts £'000	Total Usable Reserves £'000	Unusable Reserves £'000	Total Authority Reserves £'000
Balance at 31 March 2024		(1,575)	(7,398)	(48)	(73)	(9,094)	203,757	194,663
Movement in Reserves during 2024/25								
Surplus or (Deficit) on the Provision of Services		(824)	0	0	0	(824)	0	(824)
Other Comprehensive Income & Expenditure		0	0	0	0	0	(26,136)	(26,136)
Total Comprehensive Income & Expenditure		(824)	0	0		(824)	(26,136)	(26,960)
Adjustments between accounting basis & funding basis under regulations	7	(962)	0		0	(962)	962	0
Net (Increase)/Decrease before Transfers to Earmarked Reserves		(1,786)	0	0	0	(1,786)	(25,174)	(26,960)
Other Transfers to/(from) Earmarked Reserves	8	1,493	(1,540)	48	0	1	0	1
Increase/(Decrease) in 2024/25	6	(293)	(1,540)	48	0	(1,785)	(25,174)	(26,959)
Balance as at 31 March 2025		(1,868)	(8,938)	0	(73)	(10,879)	178,583	167,704

MOVEMENT IN RESERVES STATEMENT

2023/24	Note	General Fund Balance £'000	Earmarked and Grant Reserves £'000	Capital Grants Unapplied £'000	Earmarked Capital Receipts £'000	Total Usable Reserves £'000	Unusable Reserves £'000	Total Authority Reserves £'000
Balance at 31 March 2023		(1,480)	(6,222)	(85)	(34)	(7,821)	199,227	191,406
Movement in Reserves during 2023/24								
Surplus or (Deficit) on the Provision of Services		1,604	0	0	0	1,604	0	1,604
Other Comprehensive Income & Expenditure		0	0	0	0	0	1,653	1,653
Total Comprehensive Income & Expenditure		1,604	0	0		1,604	1,653	3,257
Adjustments between accounting basis & funding basis under regulations	7	(2,877)	0		0	(2,877)	2,877	0
Net (Increase)/Decrease before Transfers to Earmarked Reserves		(1,273)	0	0	0	(1,273)	4,530	3,257
Other Transfers to/(from) Earmarked Reserves	8	1,178	(1,176)	37	(39)	0	0	0
Increase/(Decrease) in 2023/24	6	(95)	(1,176)	37	(39)	(1,273)	4,530	3,257
Balance as at 31 March 2024		(1,575)	(7,398)	(48)	(73)	(9,094)	203,757	194,663

BALANCE SHEET

The Balance Sheet shows the value as at the Balance Sheet date of the assets and liabilities recognised by the Authority. The net assets of the Authority (assets less liabilities) are matched by the reserves held by the Authority. Reserves are reported in two categories. The first category of reserves are usable reserves, i.e. those reserves that the Authority may use to provide services, subject to the need to maintain a prudent level of reserves and any statutory limitations on their use (for example the Capital Receipts Reserve that may only be used to fund capital expenditure or repay debt). The second category of reserves is those that the Authority is not able to use to provide services. This category of reserves includes reserves that hold unrealised gains and losses (for example the Revaluation Reserve), where amounts would only become available to provide services if the assets are sold; and reserves that hold timing differences shown in the Movement in Reserves Statement line 'Adjustments between accounting basis and funding basis under regulations'.

31 March 2024 £'000		Note	31 March 2025 £'000
56,044	Property, Plant & Equipment	11	60,872
141	Intangible Assets	11	99
62	Long Term Debtors	14	102
56,247	Long Term Assets		61,073
614	Inventories	13	662
1,275	Short Term Debtors	14	2,527
0	Short Term Investments	15	0
2,973	Cash & Cash Equivalents	15	2,523
4,862	Current Assets		5,712
(3,830)	Short Term Borrowing	12	(10,791)
(217)	Short Term Provisions	17	(375)
(6,042)	Short Term Creditors	16	(6,258)
(10,089)	Current Liabilities		(17,424)
(231,610)	Pension Liability	18	(208,143)
0	Long Term Provisions	17	0
0	Long Term Creditors	16	(466)
(14,073)	Long Term Borrowing	12	(8,456)
(245,683)	Long Term Liabilities		(217,065)
(194,663)	Net Assets		(167,704)
(9,094)	Usable Reserves	8	(10,879)
203,757	Unusable Reserves	18	178,583
194,663	Total Reserves		167,704

CASH FLOW STATEMENT

The Cash Flow Statement shows the changes in cash and cash equivalents of the Authority during the reporting period. The statement shows how the Authority generates and uses cash and cash equivalents by classifying cash flows as operating, investing and financing activities. The amount of net cash flows arising from operating activities is a key indicator of the extent to which the operations of the Authority are funded by way of contributions and grant income or from the recipients of services provided by the Authority. Investing activities represent the extent to which cash outflows have been made for resources which are intended to contribute to the Authority's future service delivery. Cash flows arising from financing activities are useful in predicting claims on future cash flows by providers of capital (i.e. borrowing) to the Authority.

2023/24 £'000		Note	2024/25 £'000
1,604	Net (Surplus)/Deficit on the Provision of Services		(824)
(11,409)	Adjustments to Net (Surplus) or Deficit on the Provision of Services for Non-Cash Movements	19	(4,773)
(263)	Adjustments for Items Included in the net (Surplus) or Deficit on the Provision of Services that are Investing and Financing Activities	19	(447)
(10,068)	Net Cash Flows From Operating Activities	19	(6,044)
2,240	Investing Activities	20	7,508
9,032	Financing Activities	21	(1,014)
1,204	Net (Increase) or Decrease in Cash and Cash Equivalents		450
(4,177)	Cash and Cash Equivalents at the beginning of the reporting period		(2,973)
(2,973)	Cash and Cash Equivalents at the End of the Reporting Period	15	(2,523)

NOTES TO THE FINANCIAL STATEMENTS

The notes present information about the basis of preparation of the financial statements and the specific accounting policies used. They provide information not presented elsewhere in the financial statements and are relevant to an understanding of the accounts.

1 ACCOUNTING STANDARDS THAT HAVE BEEN ISSUED BUT NOT YET ADOPTED

Where a new Standard has been published but has not yet been adopted by the Code, the Authority is required to disclose information relating to the impact of the accounting change. The changes that are introduced by the 2025/26 Code are:

- a) **IAS 21 The Effects of Changes in Foreign Exchange Rate (Lack of Exchangeability)** issued in August 2023. The amendments to IAS 21 clarify how an entity should assess whether a currency is exchangeable and how it should determine a spot exchange rate when exchangeability is lacking, as well as require the disclosure of information that enables users of financial statements to understand the impact of a currency not being exchangeable.
- b) **IFRS 17 Insurance Contracts** issued in May 2017. IFRS 17 replaces IFRS 4 and sets out principles for recognition, measurement, presentation and disclosure of insurance contracts.
- c) The changes to the measurement of non-investment assets within the 2025/26 Code include adaptations and interpretations of IAS 16 Property, Plant and Equipment and IAS 38 Intangible Assets. These include setting out three revaluation processes for operational property, plant and equipment, requiring indexation for tangible non-investment assets and a requirement to value intangible assets using the historical cost approach. These have the same effect as requiring a change in accounting policy due to an amendment to standards, which would normally be disclosed under IAS 8. However, the adaptations also include a relief from the requirements of IAS 8 following a change in accounting policy as confirmed in paragraph 3.3.1.4.

It is not anticipated that the above amendments will have a material impact on the information provided in the Authority's financial statements.

2 CRITICAL JUDGEMENTS IN APPLYING ACCOUNTING POLICIES

Accounting policies are the specific principles, bases, conventions, rules and practices applied by an authority in preparing and presenting financial statements.

In applying the accounting policies set out in Appendix 1, the Authority has had to make certain judgements about complex transactions or those involving uncertainty about future events. The critical judgement in the Statement of Accounts is due to the high degree of uncertainty about future levels of funding for local government as a whole.

However the Authority has determined that this uncertainty is not sufficient to provide an indication that the assets of the Authority might be impaired as a result of the need to reduce levels of service provision.

3 ASSUMPTIONS MADE ABOUT THE FUTURE AND OTHER MAJOR SOURCES OF ESTIMATION AND UNCERTAINTY

The Statement of Accounts contains estimated figures that are based on assumptions made by the authority about the future or that are otherwise uncertain. Estimates are made taking into account historical experience, current trends and other relevant factors. However, because balances cannot be determined with certainty, actual results could be materially different from the assumptions and estimates.

The main items in the Authority's Balance Sheet at 31 March 2025, for which there is a significant risk of material adjustment in the forthcoming financial year are as follows:

Property, Plant and Equipment - The Authority revalues its assets every 5 years. It is possible that property values could continue to fluctuate especially during times of economic uncertainty. Valuations are based on assumptions about asset conditions, useful lives, residual values and market conditions. These judgements are underpinned by the best available information and made by qualified valuers.

The last full revaluation was completed on 31 March 2023, and a further review of all fire station buildings was completed via a desktop revaluation exercise as at 31 March 2024.

Pension Liability - Estimation of the net liability to pay pensions depends on a number of complex judgements relating to the discount rate used, the rate at which salaries are projected to increase, changes in retirement ages, mortality rates and, for the Local Government Pension Scheme, the expected return on pension fund assets.

Consulting actuaries are engaged to provide the Authority with expert advice about the assumptions to be applied. Further information is provided within the Pension Fund Account.

4 EVENTS AFTER THE REPORTING PERIOD

The pre-audit Statement of Accounts was certified for publication by the Treasurer on 30 May 2025. Events taking place after this date are not reflected in the financial statements or notes.

Where events taking place before this date provided information about conditions existing as at 31 March 2025, the figures in the financial statements and notes have been adjusted in all material respects to reflect the impact of this information.

There have been no material events after the Balance Sheet date.

5 NOTE TO THE EXPENDITURE AND FUNDING ANALYSIS

2024/25	Adjustments for Capital Purposes £'000	Net Charge for Pensions Adjustments £'000	Other Adjustments £'000	Total Adjustments £'000
Provision of Fire Services	(1,443)	(8,064)	198	(9,309)
Net Cost of Service	(1,443)	(8,064)	198	(9,309)
Other Income & Expenditure				
Other Income & Expenditure from the expenditure and funding analysis	(862)	10,733	447	10,318
Differences between the General Fund surplus and Comprehensive Income and Expenditure Statement surplus on the provision of services	(2,305)	2,669	645	1,009

2023/24	Adjustments for Capital Purposes £'000	Net Charge for Pensions Adjustments £'000	Other Adjustments £'000	Total Adjustments £'000
Provision of Fire Services	(1,217)	(7,008)	543	(7,682)
Net Cost of Service	(1,217)	(7,008)	543	(7,682)
Other Income & Expenditure				
Other Income & Expenditure from the expenditure and funding analysis	(85)	10,379	263	10,557
Differences between the General Fund surplus and Comprehensive Income and Expenditure Statement surplus on the provision of services	(1,302)	3,371	806	2,875

Adjustments for capital purposes – this column adds in depreciation and impairment and revaluation gains and losses in the services line, and for:

- Other operating expenditure – adjusts for capital disposals with a transfer of income on disposal of assets and the amounts written off for those assets.
- Financing and investment income and expenditure – the statutory charges for capital financing i.e. minimum revenue provision and other revenue contributions are deducted from other income and expenditure as these are not chargeable under generally accepted accounting practices.
- Taxation and non-specific grant income and expenditure – capital grants are adjusted for income not chargeable under generally accepted accounting practices. Revenue grants are adjusted from those receivable in the year to those receivable without conditions or for which conditions were satisfied throughout the year. The taxation and non-specific grant income and expenditure line is credited with capital grants receivable in the year without conditions or for which conditions were satisfied in the year.

Net change for the pensions adjustments - Net change for the removal of pension contributions and the addition of IAS 19 Employee Benefits pension related expenditure and income:

- For services this represents the removal of the employer pension contributions made by the authority as allowed by statute and the replacement with current service costs and past service costs.
- For financing and investment income and expenditure – the net interest on the defined benefit liability is charged to the CIES.

Other Adjustments - Other adjustments between amounts debited/credited to the Comprehensive Income and Expenditure Statement and amounts payable/receivable to be recognised under statute:

- For financing and investment income and expenditure the other statutory adjustments column recognises adjustments to the General Fund for the timing differences for premiums and discounts.
- The charge under Taxation and non-specific grant income and expenditure represents the difference between what is chargeable under statutory regulations that was projected to be received at the start of the year and the income recognised under generally accepted accounting practices in the Code. This is a timing difference as any difference will be brought forward in future Surpluses or Deficits on the General Fund.

6 EXPENDITURE AND INCOME ANALYSED BY NATURE

2023/24 £000		2024/25 £000
	Expenditure	
24,003	Employees	25,888
10,079	Other Operating Costs	10,312
318	Support Services	385
(14)	Gain on the disposal of assets	56
11,071	Financing and Investment Expenditure	11,362
2,478	Capital Financing Costs	2,595
47,935	Total Expenditure	50,598
	Income	
(546)	Fees, Charges & Other Service Income	(792)
(429)	Interest and Investment Income	(182)
(44,394)	Levies from Constituent Authorities	(48,549)
(962)	Government Grants and Contributions	(1,899)
(46,331)	Total Income	(51,422)
1,604	(Surplus)/Deficit on Provision of Services	(824)

7 ADJUSTMENTS BETWEEN ACCOUNTING BASIS AND FUNDING BASIS UNDER STATUTE

This note details the adjustments that are made to the total comprehensive income and expenditure recognised by the authority in the year in accordance with proper accounting practice to arrive at the resources that are specified by statutory provisions as being available to the authority to meet future capital and revenue expenditure.

The following sets out a description of the reserves that the adjustments are made against.

General Fund balance

The General Fund is the statutory fund into which all the receipts of an authority are required to be paid and out of which all liabilities of the authority are to be met, except to the extent that statutory rules might provide otherwise. These rules can also specify the financial year in which liabilities and payments should impact on the General Fund balance, which is not necessarily in accordance with proper accounting practice. The General Fund balance therefore summarises the resources that the authority is statutorily empowered to spend on its services or on capital investment (or the deficit of resources that the authority is required to recover) at the end of the financial year.

Capital receipts reserve

The capital receipts reserve holds the proceeds from the disposal of land or other assets, which are restricted by statute from being used other than to fund new capital expenditure or to be set aside to finance historical capital expenditure. The balance on the reserve shows the resources that have yet to be applied for these purposes at the year-end.

Capital grants unapplied

The capital grants unapplied account (reserve) holds the grants and contributions received towards capital projects for which the authority has met the conditions that would otherwise require repayment of the monies but which have yet to be applied to meet expenditure. The balance is restricted by grant terms as to the capital expenditure against which it can be applied and/or the financial year in which this can take place.

2023/24					Adjustments between Accounting Basis and Funding Basis under Regulations	2024/25				
General Fund Balance £'000	Capital Grants Unapplied £'000	Capital Receipts Reserves £'000	Total Usable Reserves £'000	Total Unusable Reserves £'000		General Fund Balance £'000	Capital Grants Unapplied £'000	Capital Receipts Reserves £'000	Total Usable Reserves £'000	Total Unusable Reserves £'000
(2,446)	0	0	(2,446)	2,446	Depreciation and impairment	(2,595)	0	0	(2,595)	2,595
(32)	0	0	(32)	32	Revaluation losses/Gains on Property	0	0	0	0	0
14	0	(39)	(25)	25	Disposal of non-current assets	(56)	0	0	(56)	56
1,101	0	0	1,101	(1,101)	Capital expenditure financed from earmarked reserve/CERA	1,459	0	0	1,459	(1,459)
71	0	0	71	(71)	Capital expenditure funded from grants	918	0	0	918	(918)
1,902	0	0	1,902	(1,902)	Financing Capital (MRP)	1,949	0	0	1,949	(1,949)
610	0	(39)	571	(571)		1,675	0	0	1,675	(1,675)
10,532	0	0	10,532	(10,532)	Employers Pension contributions and payments to pensioners	11,028	0	0	11,028	(11,028)
(13,903)	0	0	(13,903)	13,903	Reversal of retirement benefits in the CIES	(13,697)	0	0	(13,697)	13,697
(3,371)	0	0	(3,371)	3,371		(2,669)	0	0	(2,669)	2,669
0	37	0	37	(37)	Adjustment to Grants Reserve	0	48	0	48	(48)
(114)			(114)	114	Movement in Accumulated Absence accrual	(16)	0	0	(16)	16
(2,875)	37	(39)	(2,877)	2,877	Adjustments between accounting basis and funding basis under regulation	(1,010)	48	0	(962)	962

8 USABLE RESERVES

This note sets out the amounts set aside from the General Fund in earmarked reserves to provide financing for future expenditure plans and the amounts posted back from earmarked reserves to meet General Fund expenditure in 2024/25.

Reserve	Purpose of the Reserve	Balance 31 March 2023 £'000	Transfers (in) / out 2023/24 £'000	Balance 31 March 2024 £'000	Transfers (in) / out 2024/25 £'000	Balance 31 March 2025 £'000
Service Reserves						
Pension Reserve	Additional pension costs relating to changes to pension rules	(545)	0	(545)	(525)	(1,070)
Interest Reserve	Offset increases in interest rates that would impact on the revenue budget	(300)	0	(300)	0	(300)
Fire Hydrant Repairs	Funding of the backlog of hydrant repairs	(90)	0	(90)	0	(90)
PPE Uniform / Stock	Increased uniform costs due to changes in legislation	(250)	(447)	(697)	(71)	(768)
Transformational Change	Funding for the delivery of transformational change projects	(851)	0	(851)	0	(851)
Facilities Improvements	Ensure buildings meet required standard and improve energy efficiency	(651)	0	(651)	(329)	(980)
Legal Liability	Funding of future legal liabilities for known/expected claims	(186)	(124)	(310)	0	(310)
Training	Implement changes to training provision as required by legislation	(250)	0	(250)	0	(250)
Major Incidents	Offset costs of major incidents in excess of budget	(150)	0	(150)	0	(150)
System Improvements	A fund set aside to meet the cost of system improvements	(711)	0	(711)	0	(711)
Inflation	Offset costs of inflation in excess of budget	(250)	0	(250)	0	(250)
Firefighters Pay Structure review	Funding allocated for on-going discussions regarding the pay structure for pay progression for staff	0	(473)	(473)	0	(473)
Capital & Grants Reserves						
Capital Projects	A fund set aside for delayed schemes and retention costs	(1,043)	129	(914)	(89)	(1,003)
Radio Scheme	Emergency Service Network upgrade - offset some of the additional costs	(750)	(261)	(1,011)	(526)	(1,537)
Grant Reduction	Offset reduction in Fire Safety funding from Welsh Government	(195)	0	(195)	0	(195)
Total Earmarked Reserves		(6,222)	(1,176)	(7,398)	(1,540)	(8,938)
General Fund	Available for general purposes and to provide operational resilience	(1,480)	(95)	(1,575)	(293)	(1,868)
Capital Receipts Reserve	Holds receipts from the sale of assets, available to finance future capital expenditure	(34)	(39)	(73)	0	(73)
Capital Grants Unapplied	Holds grants and contributions received towards capital projects for which the Authority has met the conditions that would otherwise require repayment of the monies but which have yet to be applied to meet expenditure	(85)	37	(48)	48	0
Total Usable Reserves		(7,821)	(1,273)	(9,094)	(1,785)	(10,879)

9 FINANCING AND INVESTMENT INCOME AND EXPENDITURE

2023/24 £'000		2024/25 £'000
692	Interest payable and similar charges	629
(429)	Interest receivable and similar income	(182)
10,379	Net Interest on the net defined benefit liability	10,733
10,642	Total	11,180

10 TAXATION AND NON SPECIFIC GRANT INCOME

2023/24 £'000		2024/25 £'000
7,478	Conwy County Borough Council	8,063
4,403	Anglesey County Council	4,871
7,914	Gwynedd Council	8,295
6,064	Denbighshire County Council	6,812
9,936	Flintshire County Council	10,957
8,599	Wrexham County Borough Council	9,551
44,394	Levies from Constituent Authorities	48,549
71	Capital Grants and Contributions	918
44,465	Total Taxation and Non Specific Grant Income	49,467

11 PROPERTY PLANT AND EQUIPMENT AND INTANGIBLE ASSETS

Movements on Balances

2024-2025	Land and Buildings	Vehicles and Equipment	Assets Under Construction	Property Plant & Equipment	Intangible Assets	Assets Held for Sale
	£'000	£'000	£'000	Total £'000	Total £'000	Total £'000
Gross Book Value at 31 March 2024	46,253	24,129	1,060	71,442	233	0
Recognition of Right of Use Assets	593	310	0	903	0	0
Gross Book Value at 1 April 2024	46,846	24,439	1,060	72,345	233	0
Re-categorisation of assets	483	577	(1,060)	0	0	0
Additions	3,402	2,366	766	6,534	0	0
Revaluation increase / (decreases) recognised in the Revaluation Reserve	0	0	0	0	0	0
Revaluation increase / (decreases) recognised in the Surplus / Deficit on the Provision of Services	0	0	0	0	0	0
Derecognition - Disposals	0	(777)	0	(777)	0	0
Derecognition - Other	0	0	0	0	0	0
Gross Book Value at 31 March 2025	50,731	26,605	766	78,102	233	0
Accumulated Depreciation & Impairment						
At 1 April 2024	(43)	(15,355)	0	(15,398)	(92)	0
Depreciation/Amortisation charge	(984)	(1,569)	0	(2,553)	(42)	0
Depreciation written out of the Revaluation Reserve	0	0	0	0	0	0
Depreciation written out to the Surplus / Deficit on the Provision of Services	0	0	0	0	0	0
Derecognition - Disposals	0	721	0	721	0	0
Derecognition - Other	0	0	0	0	0	0
Accumulated Depreciation at 31 March 2025	(1,027)	(16,203)	0	(17,230)	(134)	0
NET BOOK VALUE AT 31 MARCH 2025	49,704	10,402	766	60,872	99	0
NET BOOK VALUE AT 31 MARCH 2024	46,210	8,774	1,060	56,044	141	0

2023-2024	Land and Buildings	Vehicles and Equipment	Assets Under Construction	Property Plant & Equipment	Intangible Assets	Assets Held for Sale
	£'000	£'000	£'000	Total £'000	Total £'000	Total £'000
Gross Book Value at 1 April 2023	47,289	24,721	85	72,095	431	0
Re-categorisation of assets	0	36	(36)	0	0	0
Additions	414	758	1,011	2,183	0	0
Revaluation increase / (decreases) recognised in the Revaluation Reserve	(1,352)	0	0	(1,352)	0	0
Revaluation increase / (decreases) recognised in the Surplus / Deficit on the Provision of Services	(95)	0	0	(95)	0	0
Derecognition - Disposals	(3)	(1,303)	0	(1,306)	0	0
Derecognition - Other	0	(83)	0	(83)	(198)	0
Gross Book Value at 31 March 2024	46,253	24,129	1,060	71,442	233	0
Accumulated Depreciation & Impairment						
At 1 April 2023	(4)	(15,250)	0	(15,254)	(209)	0
Depreciation/Amortisation charge	(897)	(1,468)	0	(2,365)	(81)	0
Depreciation written out of the Revaluation Reserve	795	0	0	795	0	0
Depreciation written out to the Surplus / Deficit on the Provision of Services	63	0	0	63	0	0
Derecognition - Disposals	0	1,280	0	1,280	0	0
Derecognition - Other	0	83	0	83	198	0
Accumulated Depreciation at 31 March 2024	(43)	(15,355)	0	(15,398)	(92)	0
NET BOOK VALUE AT 31 MARCH 2024	46,210	8,774	1,060	56,044	141	0
NET BOOK VALUE AT 31 MARCH 2023	47,285	9,471	85	56,841	222	0

Depreciation

Buildings are depreciated using componentisation, where an estimate is made of the useful life of each component of the building and a weighted average then used to calculate the annual charge.

Other assets are recognised at historic cost, which is a proxy for current cost on short life assets, and depreciated over their useful lives.

Revaluations and Impairments

The authority ensures that all property, plant and equipment required to be measured at current value is revalued sufficiently regularly so that their carrying amount is not materially different from their current value at the year-end, and as a minimum every five years. All valuations were carried out internally. Valuations of land and buildings were carried out in accordance with the methodologies and basis for estimation set out in the professional standards of the Royal Institution of Chartered Surveyors.

A review of all fire station buildings was undertaken, as at 31 March 2025, following advice from the valuers that the replacement cost had reduced. Fire stations are valued at depreciated replacement cost. Office accommodation and workshops were revalued in 2023/24 and are valued at existing use value.

Valuations of vehicles, plant and equipment were based on current prices where there was an active second-hand market or latest list prices adjusted for the condition of the asset.

Capital Commitments

The Authority is committed to capital expenditure in future periods arising from contracts entered into at the Balance Sheet date. Capital expenditure committed at the 31 March 2025 for future periods equates to £1,661k (2023/24: £3,804k). The commitments relate to the following:

Description	£'000
Building Works	626
Vehicles	1,035
Total	1,661

Surplus Assets (Non operational property, plant and equipment)

The Authority does not have any material surplus assets.

12 FINANCIAL INSTRUMENTS

Categories of Financial Instruments

The following categories of financial instruments are carried in the Balance Sheet:

	Non Current		Current	
	31 March 2024 £'000	31 March 2025 £'000	31 March 2024 £'000	31 March 2025 £'000
Financial Assets at Amortised Cost:				
Cash and Cash Equivalents	0	0	2,973	2,523
Debtors	62	102	1,275	2,527
Financial Liabilities at Amortised Cost:				
Interest Accrued	0	0	(116)	(174)
Borrowings	(14,073)	(8,456)	(3,714)	(10,617)
Total Borrowing	(14,073)	(8,456)	(3,830)	(10,791)
Creditors	0	(466)	(6,042)	(6,258)

Financial Instruments Gains/Losses

The gains and losses recognised in the Comprehensive Income and Expenditure Statement in relation to financial instruments are made up as follows:

	2023/24		2024/25	
	Financial Liabilities Measured at amortised cost £'000	Financial Assets Loans and receivables £'000	Financial Liabilities Measured at amortised cost £'000	Financial Assets Loans and receivables £'000
Interest expense	692		629	
Total expense in Surplus or Deficit on the Provision of Services	692		629	
Interest income		(429)		(182)
Total income in Surplus or Deficit on the Provision of Services		(429)		(182)
Net gain/(loss) for the year	692	(429)	629	(182)

Fair Value of Assets and Liabilities carried at Amortised Cost

Financial liabilities and financial assets represented by loans and receivables are carried on the Balance Sheet at amortised cost (in long term assets/liabilities with accrued interest in current assets/liabilities). Their fair value can be assessed by calculating the present value of the cash flows that take place over the remaining life of the instruments, using the following assumptions:

- For loans from the PWLB and other loans payable, borrowing from the PWLB has been applied to provide the fair value under PWLB debt redemption procedures;
- For loans receivable prevailing benchmark market rates have been used to provide the fair value;
- No early repayment or impairment is recognised;
- Where an instrument has a maturity of less than 12 months or is a trade or other receivable the fair value is taken to be the carrying amount or the billed amount;
- The fair value of trade and other receivables is taken to be the invoiced or billed amount.

The fair values calculated are as follows:

	31-Mar-24		31-Mar-25	
	Carrying amount	Fair value	Carrying amount	Fair value
	£'000	£'000	£'000	£'000
PWLB debt	(17,787)	(17,118)	(14,073)	(13,300)
Non-PWLB debt	0	0	(5,000)	(5,000)
Total Debt	(17,787)	(17,118)	(19,073)	(18,300)

The fair value has been calculated with direct reference to published price quotations in an active market. In the case of the Fire and Rescue Authority they are based on premiums that would be payable if PWLB loans were surrendered and provides an estimate of the additional interest payable compared to the same loan at current market rates discounted back to the current period.

13 INVENTORIES

	Main Stores		Fleet Stock		Totals	
	2023/24	2024/25	2023/24	2024/25	2023/24	2024/25
	£'000	£'000	£'000	£'000	£'000	£'000
Balance at start of year	451	413	187	201	638	614
Purchases	314	952	229	203	543	1,155
Write offs/adjustments	(50)	(3)	(1)	(1)	(51)	(4)
Recognised as an Expense in year	(302)	(925)	(214)	(178)	(516)	(1,103)
Balance outstanding at year end	413	437	201	225	614	662

14 DEBTORS

2023/24 £'000		2024/25 £'000
	Long Term	
62	Prepayments	102
62	Total Long Term	102
	Short Term	
286	Other Receivable Amounts	445
488	Trade Receivables	1,509
501	Prepayments	573
1,275	Total Short Term	2,527
1,337	Total Long and Short Term Debtors	2,629

15 CASH AND CASH EQUIVALENTS

31-Mar-24 £'000		31-Mar-25 £'000
1,483	Cash and Bank Balances	2,517
1,480	Short Term Deposits	0
10	Petty Cash Imprests	6
2,973	Total	2,523

16 CREDITORS

2023/24 £'000		2024/25 £'000
	Long Term	
0	Trade Payables	(466)
0	Total Long Term	(466)
	Short Term	
(3,364)	Other Payables	(820)
(2,678)	Trade Payables	(5,438)
(6,042)	Total Short Term	(6,258)
(6,042)	Total Long and Short Term Creditors	(6,724)

17 PROVISIONS

At 31 March 2025 the Authority held a provision with a value of £374k relating to employee liabilities. This provision will be utilised to offset revenue expenditure, when it occurs.

	Opening Balance £'000	Movements In £'000	Movements Out £'000	Closing Balance £'000
Short Term Provisions	(217)	(175)	17	(375)
Long Term Provisions	0	0	0	0
Total	(217)	(175)	17	(375)

18 UNUSABLE RESERVES

31-Mar-24 £'000		31-Mar-25 £'000
(17,304)	Revaluation Reserve	(17,009)
(10,935)	Capital Adjustment Account	(12,954)
231,610	Pensions Reserve	208,143
386	Accumulated Absences Account	403
203,757	Total	178,583

Revaluation Reserve

The Revaluation Reserve contains the gains made by the Authority arising from increases in the value of its Property, Plant and Equipment.

The balance is reduced when assets with accumulated gains are:

- revalued downwards or impaired and the gains are lost;
- used in the provision of services and the gains are consumed through depreciation or disposed of and the gains are realised.

The Reserve contains only revaluation gains accumulated since 1 April 2007, the date that the Reserve was created. Accumulated gains arising before that date are consolidated into the balance on the Capital Adjustment Account.

2023/24 £'000		2024/25 £'000
(18,175)	Balance at 1 April	(17,304)
0	Upward revaluation of assets	0
557	Downward revaluation of assets and impairment losses not charged to the surplus/deficit on the provision of services.	0
0	Prior Year Adjustment	0
0	Adjustment from Capital Adjustment Account	0
314	Difference between fair value depreciation and historical cost depreciation	295
(17,304)	Balance at 31 March	(17,009)

Capital Adjustment Account

The Capital Adjustment Account absorbs the timing differences arising from the different arrangements for accounting for the consumption of non-current assets and for financing the acquisition, construction or enhancement of those assets under statutory provisions.

The Account is debited with the cost of acquisition, construction or enhancement as depreciation, impairment losses and amortisations are charged to the Comprehensive Income and Expenditure Statement (with reconciling postings from the Revaluation Reserve to convert fair value figures to a historical cost basis). The Account is credited with the amounts set aside by the Authority as finance for the costs of acquisition, construction and enhancement. The Account contains accumulated gains and losses on Investment Properties and gains recognised on donated assets that have yet to be consumed by the Authority.

The Account also contains valuation gains accumulated on Property, Plant and Equipment before 1 April 2007, the date that the Revaluation Reserve was created to hold such gains.

2023/24 £'000		2024/25 £'000
(10,013)	Balance at 1 April	(10,935)
2,445	Charges for depreciation & impairment of non-current assets	2,595
25	Amount of non current asset written off on disposal or sale	56
32	Adjustment relating to the revaluation of assets	0
(314)	Adjusting amounts written out of the Revaluation Reserve	(295)
2,188	Net written out amount of the cost of non-current assets consumed in the year	2,356
(71)	Capital grants & contributions credited to the Comprehensive Income and Expenditure Statement that have been applied to capital financing	(918)
(1,101)	Capital expenditure charged against the General Fund/ Earmarked reserves	(1,459)
(36)	Application of grants to capital financing from the capital grants unapplied account	(49)
(1,902)	Statutory provision for the financing of capital investment charged against the General Fund	(1,949)
(3,110)	Capital Financing Applied in year	(4,375)
(10,935)	Balance at 31 March	(12,954)

Pensions Reserve

The pensions reserve absorbs the timing differences arising from the different arrangements for accounting for post-employment benefits and for funding benefits in accordance with statutory provisions. The authority accounts for post-employment benefits in the Comprehensive Income and Expenditure Statement as the benefits are earned by employees accruing years of service, updating the liabilities recognised to reflect inflation, changing assumptions and investment returns on any resources set aside to meet the costs. However, statutory arrangements require benefits earned to be financed as the authority makes employer's contributions to pension funds or eventually pays any pensions for which it is directly responsible. The debit balance on the pensions reserve therefore shows a substantial shortfall in the benefits earned by past and current employees and the resources the authority has set aside to meet them. The statutory arrangements will ensure that funding will have been set aside by the time the benefits come to be paid.

2023/24 £'000		2024/25 £'000
227,143	Opening Balance 1 April	231,610
1,096	Re-measurement of the net defined benefit liability	(26,136)
13,903	Reversal of Items related to retirement benefits debited to the Provision of Service in the Comprehensive Income & Expenditure Statement	13,697
(10,532)	Employer's pensions contributions and direct payments to pensioners payable in the year	(11,028)
4,467	Movement on Pension Reserve	(23,467)
231,610	Balance at 31 March	208,143

Accumulated Absences Account

The Accumulated Absences Account absorbs the differences that would otherwise arise on the General Fund balance from accruing for compensated absence earned but not taken in the year, e.g. annual leave entitlement carried forward at 31 March. Statutory arrangements require that the impact on the General Fund Balance is neutralised by transfers to or from the Account.

2023/24 £'000		2024/25 £'000
272	Balance at 1 April	386
(272)	Settlement or cancellation of accrual made at the end of the preceding year	(386)
386	Amounts accrued at the end of the current year	403
386	Balance at 31 March	403

19 CASH FLOW STATEMENT - OPERATING ACTIVITIES

2023/24 £'000		2024/25 £'000
1,604	Net (Surplus)/Deficit on the Provision of Services	(824)
	Adjustment to net (surplus)/deficit for non-cash movements	
(26)	Increase/(Decrease) in Inventories	49
(3,736)	Increase/(Decrease) in Debtors	1,294
(1,754)	(Increase)/Decrease in Creditors	(683)
(2,446)	Depreciation Charge	(2,595)
39	Contributions Received/Capital Receipts	0
(3,371)	IAS 19 Pension Adjustments	(2,608)
(32)	Impairment Charge/Revaluation of Assets	0
(25)	Carrying amount of Non Current Assets sold or derecognised	(56)
56	Contribution (to)/from Various Provisions	(158)
0	Other non-cash items charged to the net surplus or deficit on the provision of services	0
(114)	Accumulated Absences Reserve	(16)
(11,409)	Less Total	(4,773)
	Adjustments for Items Included in the net (Surplus) or Deficit on the Provision of Services that are Investing and Financing Activities	
(692)	Interest paid	(629)
429	Interest Received	182
(263)		(447)
(10,068)	Net Cash Flow From Operating Activity	(6,044)

20 CASH FLOW STATEMENT – INVESTING ACTIVITIES

2023/24 £'000		2024/25 £'000
2,183	Purchase of property, plant and equipment, investment property and intangible assets	6,534
(14)	Proceeds from the sale of property, plant and equipment, investment property and intangible assets	56
71	Other receipts from investing activities	918
2,240	Net cash flow from investing activities	7,508

21 CASH FLOW STATEMENT – FINANCING ACTIVITIES

2023/24 £'000		2024/25 £'000
0	Cash receipts of short-term and long-term borrowing	(5,000)
8,769	Repayments of short-term and long-term borrowing	3,539
263	Other payments for financing activities	447
9,032	Net cash flow from financing activities	(1,014)

22 MEMBERS' ALLOWANCES

The Authority paid the following amounts to members of the Authority during the year:

2023/24 £		2024/25 £
84,804	Elected Members' Allowances	90,515
2,209	Elected Members' Expenses	1,560
2,390	Co-opted Members' costs	1,142
89,403	Total	93,217

Elected members

Elected Members of the Fire and Rescue Authority are entitled to receive allowances in recognition of their roles and responsibilities. These allowances include a basic salary payable to all members, and where applicable, senior salaries for those undertaking additional duties such as Chair or Deputy Chair of the Authority or its committees.

In addition to allowances, Elected Members may claim reimbursement for expenses incurred in the performance of their official duties. These expenses typically include travel and subsistence costs associated with attending Authority meetings, training sessions, and other approved engagements.

Co-opted Members

Co-opted Members, who are appointed to provide independent input or specialist expertise—such as those serving on the Standards Committee—do not receive an allowance. Instead, they are eligible for payments in recognition of their participation in official meetings and related activities.

23 OFFICERS' REMUNERATION

The remuneration paid to the Authority's senior employees is detailed in the following table. Senior Officers whose salary is £150,000 or more are named:

Post Title	Year	Salary (Inc Fees & Allowances) £	Pension Contributions £	Total Remuneration £
Chief Fire Officer: Dawn Docx	2023/24	160,231	29,216	189,447
	2024/25	156,392	28,620	185,012
Deputy Chief Fire Officer	2023/24	127,594	34,833	162,427
	2024/25	125,114	38,785	163,899
Assistant Chief Fire Officer (retired June 2023)	2023/24	31,369	6,888	38,257
	2024/25	0	0	0
Assistant Chief Fire Officer (seconded March 2024)*	2023/24	104,335	28,483	132,818
	2024/25	47,314	13,938	61,252
Assistant Chief Fire Officer	2023/24	120,176	21,912	142,088
	2024/25	117,294	21,465	138,759
Temporary Assistant Chief Fire Officer (appointed March 2024)**	2023/24	6,530	1,421	7,951
	2024/25	101,921	25,901	127,822
Temporary Assistant Chief Fire Officer (appointed January 2025)	2023/24	0	0	0
	2024/25	28,926	7,431	36,357
Treasurer - Section 151 Officer (15 days per Year)	2023/24	8,180	2,860	11,040
	2024/25	8,340	1,526	9,866

The 2023/24 figures above include backpay of £38k, from January 2022, due to the settlement of the Brigade Managers pay award agreed in May 2023.

*Assistant Chief Fire Officer temporarily seconded to South Wales Fire and Rescue Service as Chief Fire Officer, returned to NWFRS with effect from 14 November 2024. Salary costs for this period, totalling £107,708 and pension costs totalling £22,423, have been met and reported by South Wales Fire and Rescue Service.

** The fixed-term contract for the Assistant Chief Fire Officer (ACFO) concluded at the end of December. Following this, due to changes within the principal officer availability, the ACFO was subsequently re-appointed on a temporarily basis in February 2025.

The Monitoring Officer is provided by Flintshire County Council as part of a Service Level Agreement so no costs for an individual are shown in the table above. Further details on the Monitoring Officer costs can be found within Note 27 – Related Parties.

The Authority's other employees receiving more than £60,000 remuneration for the year (excluding employer pension contributions) were paid the following amounts:

REMUNERATION BAND	NUMBER OF EMPLOYEES	
	2023/24	2024/25
£60,000 - £64,999	19	22
£65,000 - £69,999	6	6
£70,000 - £74,999	6	4
£75,000 - £79,999	1	2
£80,000 - £84,999	0	0
£85,000 - £89,999	2	2
£90,000 - £94,999	1	2

The following table gives the ratio between the Chief Fire Officer's remuneration and the median remuneration of Fire and Rescue Service staff:

2023/24 £		2024/25 £
160,231	Chief Fire Officer	156,392
36,226	Median	37,675
4.42	Ratio	4.15

The staff that are employed under Retained Duty System (RDS) contracts have been included in the calculation on their Full Time Equivalent scale point rather than actual earnings. The data for 2023/24 includes total salary paid and also includes backpay for the CFO relating to 2022-23 which has reflected on the ratio (excludes pension contributions).

There were no redundancies and hence no exit packages in 2023/24 and 2024/25.

24 EXTERNAL AUDIT COSTS

Fees payable to the Auditor General for Wales with regard to external audit services carried out by the appointed auditor:

2023/24 £'000		2024/25 £'000
60	Financial Audit work	60
16	Performance Audit work	17
76	Total	77

25 GRANTS

2023/24 £'000	Credited to Services	2024/25 £'000
169	Arson Reduction	0
240	Home Safety Equipment	250
322	All Wales National Resilience	304
141	Youth & Young People Engagement	145
14	Operation Ugain	72
5	Cyber Essentials	0
0	Windrush Grant	2
0	Fire and Rescue Service Pay Pressures	209
891	TOTAL	982
	Credited to taxation and non-specific income & expenditure	
71	All Wales National Resilience	0
0	Fireground Radios	377
0	Electric Vehicles	115
0	Electric Vehicle Charging Infrastructure	131
0	Public Sector Low Carbon Heat Grant	295
71	TOTAL	918

26 AGENCY SERVICES

The Authority acts as an agent on behalf of Welsh Government in administering two grant schemes for all the Fire and Rescue Services in Wales. The approved grants are paid to North Wales Fire and Rescue Service who are then responsible for distributing the grants to the Mid and West Wales Fire and Rescue Service and South Wales Fire and Rescue Service.

The Authority acts as an agent for the Local Resilience Forum. This is a multi-agency partnership made up of representatives from local public services, including the emergency services, local authorities, the NHS, the Environment Agency and others. Contributions from the various public bodies, are paid to North Wales Fire and Rescue Service. This funding is utilised to pay for the expenditure of the Forum. As at 31 March 2025, the Authority held funds of £11k relating to the Forum.

2023/24 £'000		2024/25 £'000
3,144	All Wales National Resilience	3,117
266	Youth and Young People Engagement	227
135	Local Resilience Forum	110
3,545	Total	3,454

27 RELATED PARTIES

The Authority is required to disclose material transactions with related parties – bodies or individuals that have the potential to control or influence the Authority or to be controlled or influenced by the Authority. Disclosure of these transactions allows readers to assess the extent to which the Authority might have been constrained in its ability to operate independently or might have secured the ability to limit another party's ability to bargain freely with the authority.

Welsh Government

The Welsh Government has significant influence over the general operations of the Authority – it is responsible for providing the statutory framework within which the authority operates, provides the majority of its funding in the form of grants (the Revenue Support Grant is paid to constituent authorities) and prescribes the terms of many of the transactions that the authority has with other parties. Directly received grant receipts are shown in Note 25 and constituent authority contributions are shown in Note 10.

Members

Members of the authority have direct control over the authority's financial and operating policies. The total of members' allowances paid in 2024/25 is shown in Note 22.

All Members completed a declaration of interest with related parties return for the year 2024/25. Apart from allowances and expenses no other transactions were identified. Nothing was paid by the Authority during 2024/25 under such arrangements (2023/24: nil), and no income was received by the Authority during 2024/25 (2023/24: nil).

A list of Elected Members' interests is maintained by the Monitoring Officer and is available to view on the website - www.northwalesfire.gov.wales

Senior Officers

The Senior Officers completed a declaration of interest with related parties return for the year 2024/25. Senior Officers' remuneration is shown in Note 23.

An Assistant Chief Fire Officer declared an interest as a trustee with DangerPoint. The independent charity runs an education activity centre based in North Wales. Payments of £13,300 have been made to DangerPoint in 2024/25, as part of Welsh Government grant funding (2023/24: £12,844). In addition, funding is provided for the cost of an administrator, which amounted to £34,826 (2023/24: £32,258).

The S.151 Officer was also contracted as Independent Board Chair for Powys Pension Fund, and as a Non-Executive Director on the Board of Adra, a housing association.

No income was received by the Authority during 2024/25 (2023/24: nil).

Other Public Bodies

Flintshire County Council provide the role of Monitoring Officer. This post is held by the Chief Officer (Governance)/Monitoring Officer and payments amounted to £20k (2023/24: £19k).

Conwy County Borough Council previously provided legal services, with the arrangement coming to an end during 2023/24 (2023/24: £12k). As at 31 March 2025 £12k remained outstanding.

Mersey Internal Audit provide internal audit services for which payments amounted to £23k. As at 31 March 2025 nothing remained outstanding.

Carmarthenshire County Council, acting on behalf of the Dyfed Pension Fund, manage the payments made to firefighter pensioners on behalf of the Authority. They are also responsible for managing the records of current pensioners and active members of the scheme. Transactions in the year amounted to £113k (2023/24: £91k). As at 31 March 2024 nothing remained outstanding.

South Wales Fire & Rescue Service, via a secondment agreement, provide a Firefighter's Pension Lead for which payments in year amounted to £18k (2023/24: £2k) which was outstanding at year end.

There are joint arrangements with North Wales Police and Crime Commissioner as well as a shared control room. The Authority's contribution towards facilities management amounted to £234k (2023/24: £220k). Procurement advice was previously provided with the arrangement coming to an end during 2023/24 (2023/24: £7k). As at 31 March 2025 £7k remained outstanding.

28 CAPITAL EXPENDITURE AND CAPITAL FINANCING

The total amount of capital expenditure incurred in the year is shown in the table below (including the value of assets acquired under finance leases and PFI contracts), together with the resources that have been used to finance it. Where capital expenditure is to be financed in future years by charges to revenue as assets are used by the authority, the expenditure results in an increase in the capital financing requirement (CFR), a measure of the capital expenditure incurred historically by the authority that has yet to be financed.

2023/24 £'000		2024/25 £'000
28,877	Opening Capital Financing Requirement	27,950
	Capital Investment	
2,183	Property, Plant & Equipment	6,534
	Sources of Finance	
(107)	Government Grants & Contributions	(967)
(1,902)	Sums set aside from revenue	(1,949)
(1,101)	Direct Revenue Contributions	(1,459)
27,950	Closing Capital Financing Requirement	30,109
(927)	Increase/(decrease) in underlying need to borrow (unsupported by government financial assistance)	2,159
(927)	Increase/(decrease) in Capital Financing Requirement	2,159

29 LEASES

Authority as lessee

Leases are recognised as right of use assets with a corresponding liability at the date from which the leased asset is available for use (or the IFRS 16 transition date, if later). The leases are typically for fixed periods in excess of one year, but may have extension options.

The authority has acquired vehicles and equipment by entering into lease contracts with typical terms of four years. In addition the authority leases three buildings with typical lease terms of five years.

The table shows the change in the right of use assets held under leases by the Authority.

	Land & Buildings	Vehicles and Equipment	Total
	£000	£000	£000
Balance at 1 April 2024	593	310	903
Additions	0	0	0
Revaluations	0	0	0
Depreciation and amortisation	(108)	(143)	(251)
Disposals	0	(3)	(3)
Balance as at 31 March 2025	485	164	649

The authority incurred the following expenses and cash flows in relation to leases:

	Land & Buildings	Vehicles and Equipment	Total
	£000	£000	£000
Comprehensive income and expenditure statement			
Interest expense on lease liabilities	29	17	46
Expense relating to short-term leases	0	4	4
Expense relating to exempt leases of low value items	0	2	2
Cash flow statement			
Minimum lease payments	115	155	270

As permitted by the Code, the authority excludes leases:

- for low value items that costs less than £10,000, in line with the de-minimus expenditure level for Property, Plant and Equipment.
- with a term shorter than 12 months

The lease liabilities are due to be settled over the following time bands (measured at the undiscounted amounts of expected cash payments)

	31 March 2024	31 March 2025
	£000	£000
Less than one year	444	437
One to five years	1,182	466
More than five years	72	0
Total undiscounted liabilities	1,698	903

30 DEFINED BENEFIT PENSION SCHEMES

Participation in Pension Schemes

As part of the terms and conditions of employment of its officers, the Authority makes contributions towards the cost of post-employment benefits. Although these benefits will not actually be payable until employees retire, the Authority has a commitment to make the payments (for those benefits) and to disclose them at the time that the employees earn their future entitlement.

The Local Government Pension Scheme (LGPS) is operated under the regulatory framework for the Local Government Pension Scheme. The LGPS is a defined benefit funded scheme of which the Authority is an employer member of the Clwyd Pension fund. The governance of this scheme is the responsibility of Clwyd Pension Fund, Flintshire County Council in its capacity of Scheme Manager and Administering Authority.

Policy is determined in accordance with the Pensions Fund Regulations and overseen by the Pension Committee, including the appointment of the investment managers. The principal risks to the authority of the scheme are the longevity assumptions, statutory changes to the scheme, structural changes to the scheme (i.e. large-scale withdrawals from the scheme), changes to inflation, bond yields and the performance of the equity investments held by the scheme.

These are mitigated to a certain extent by the statutory requirements for an actuarial revaluation to be undertaken at regular intervals and for employer and employee contribution rates to be set. The employer contributions are charged to the cost of services based on employee earnings in the period rather than when the benefits are eventually paid as pensions.

The charge to the levy reflects only the actual pension payments made during the year. However, to show the full cost of retirement benefits, these are first recorded in the Comprehensive Income and Expenditure Statement and then reversed out of the General Fund through the Movement in Reserves Statement. The following entries reflect these adjustments.

Any discretionary benefits or additional costs associated with ill-health retirements are an unfunded cost and charged separately to the Authority. To the extent that such costs are known they are included within the budget setting process and the Authority maintains a reserve to address any unplanned costs and to smooth the effect of changes to the employer contribution rates.

The Firefighters' Pension Scheme (FFPS) is an unfunded defined benefits scheme, meaning that no investments are held to fund the liabilities. Contributions, at a rate set by the Welsh Government, made by the employer and employees on pensionable earnings are held in a pension fund account. Benefits paid to retirees are also charged to the account with any cash deficit being received from or paid to the Welsh Government.

The information that follows has been extracted from the disclosure reports provided by Mercer (for the LGPS pension scheme) and Government Actuary's Department (GAD) (for the Firefighters Pension Scheme (FFPS)). The most relevant details affecting the Pension funds are detailed below:

Guaranteed Minimum Pension equalisation and indexation

The Government has published a consultation on indexation and equalisation of Guaranteed Minimum Pensions (GMP), with the proposal being to extend the “interim solution” to those members who reach State Pension Age after 5 April 2021. A past service cost was included within the 2019/20 disclosures for extending the equalisation to all future retirees.

There was also a further court ruling on 20 November 2020 regarding GMP equalisation. The court ruled that scheme trustees are required to revisit past Cash Equivalent Transfer Values (CETVs) to ensure GMP equalisation. This may result in additional top-ups where GMP equalisation means that members did not receive their full entitlement. For public service pension schemes, the expectation is that this ruling will be taken forward on a cross scheme basis and will need legal input.

This may require revisiting past CETV cases for members with State Pension age after 5 April 2016 and who took a CETV from the scheme before CETV were equalised. The scope of any costs are yet to be determined. Data on historic CETVs is not available to estimate the potential impact. It is expected that this will be a relatively small uplift for a relatively small subset of members (i.e. those who took a CETV and are in scope for a top up).

McCloud and 2016 valuation cost control

Following the Court of Appeal, the McCloud judgment was handed down in December 2018 which concluded that the transitional protections introduced in 2015 were discriminatory on the basis of age. The UK Government subsequently announced plans to address the discrimination across the UK public sector pension schemes including the Firefighters' Pension Scheme.

The past service costs have been estimated to take into account the impact of the McCloud judgment and have been included within the Pension Fund since 2018/19. These estimates have been updated to reflect the remedy outlined by the UK Government and the requisite changes to the Firefighters' Pension Scheme Regulations laid down by Welsh Ministers which came into force on 1 October 2023.

The Firefighters' Pensions (Remediable Service) (Wales) Regulations 2023 were laid and came into force on 1 October 2023 to make provision for Scheme Managers to implement the changes necessary to effect remedy and these are required to be completed within an 18-month period. Due to the complexity and volume of calculations, the Service did not fully meet the deadline of 31 March 2025.

Due to the inability to meet the statutory requirements of Section 29 of the PSPJOA 2022, the matter was reported to The Pensions Regulator (TPR). TPR may impose penalties and fines for failing to meet the statutory deadline. The minimum fine that TPR can issue for failing to meet statutory deadlines is £500. This fine can increase depending on the specifics of the case, such as the number of members in the pension scheme. At this stage the value and timing of any outflow is currently unknown.

O'Brien

Following a lengthy legal process, the judgment in the case of O'Brien vs Ministry of Justice was issued during 2019. This found that the decision to limit the period from which a part-time employee could join the pension scheme was erroneous and eligible employees should be permitted to join the relevant scheme with effect from the start of their contracts.

This judgment has national implications for staff who are employed as retained firefighters whose contract of employment commenced before 1 July 2000 or those who have not yet received the full opportunity to purchase past service to which they were entitled.

The Welsh Ministers have made amendments to the Firefighters Pension Scheme 2007 (Modified) to provide a mechanism for this matter to be addressed. The Firefighters' Pension Schemes and Compensation Scheme (Amendment) (Wales) Order 2024, was made and laid in January and came into force on 1 February 2024. All eligible persons will be afforded the opportunity of buying back pension entitlements within the timescales specified within the order.

The full financial impact of the updated regulations cannot be fully calculated although an estimate has been included within the 2020 valuation of the Authority's pension scheme liabilities undertaken by the Government's Actuary Department (GAD).

The tables below provide additional details regarding the pension schemes:

LGPS	FFPS	General Fund Transfers	LGPS	FFPS
2023/24 £'000	2023/24 £'000		2024/25 £'000	2024/25 £'000
		Comprehensive Income & Expenditure Statement		
		Cost of Services		
		Service Cost comprising:		
1,055	1,620	Current Service Cost	1,033	1,870
0	0	Past Service Costs	0	0
49	0	Administration Expenses	51	0
		Financing & Investment Income & Expenditure		
69	10,310	Net Interest Expense	(16)	10,810
0	0	Transfers out of scheme	0	0
0	800	Transfers in to scheme	0	(10)
0	0	Curtailments	0	0
1,173	12,730	Total Post Employment Benefits Charged to Provision of Services	1,068	12,670
		Other Post Employment Benefits Charged to the Comprehensive Income & Expenditure Statement		
		Remeasurement of the net defined benefit/liability comprising:		
(1,852)	0	Return on Plan Assets (excluding Interest)	1,894	0
(331)	0	Actuarial (Gains)/Losses arising on Changes in Demographic Assumptions	(51)	(530)
(1,359)	(4,410)	Actuarial (Gains)/Losses arising on Changes in Financial Assumptions	(6,176)	(25,240)
0	7,810	Actuarial (Gains)/Losses - experience	0	(60)
(3,542)	3,400	Total Post Employment Benefits Charged to the Comprehensive Income & Expenditure Statement	(4,333)	(25,830)
		Movement in Reserves Statement		
(1,173)	(12,730)	Reversal of net charges made to the surplus or deficit on the Provision of Services for Post Employment Benefits in accordance with the Code	(1,068)	(12,670)
		Actual amounts charged to the General Fund for pensions in the year		
0	9,910	Retirement Benefits payable to Pensioners	0	10,370
622	0	Employer Contributions Payable to the scheme	658	0

The amount included on the Balance Sheet arising from the Authority's obligation, in respect of its defined benefit plans are as follows:

LGPS 2023/24 £'000	FFPF 2023/24 £'000	Pension Assets and Liabilities Recognised in the Balance Sheet	LGPS 2024/25 £'000	FFPF 2024/25 £'000
(40,392)	(231,610)	Present value of the defined benefit obligation	(35,728)	(208,100)
41,630		Fair Value of plan assets	40,950	
1,238	(231,610)	Sub Total	5,222	(208,100)
(1,238)		Effect of IAS19 / IFRIC 14	(5,265)	
0	(231,610)	Net surplus / (liability) arising from defined benefit obligation	(43)	(208,100)

LGPS 2023/24 £'000	FFPF 2023/24 £'000	Movement in the Value of Scheme Assets	LGPS 2024/25 £'000	FFPF 2024/25 £'000
38,559	0	Opening Fair Value of Scheme Assets	41,630	0
1,837	0	Interest Income	2,021	0
		Remeasurement Gain/Loss		
1,852	0	The return on plan assets, excluding the amount included in the net interest expense	(1,894)	0
622	11,520	Contributions from employer	658	12,440
419	0	Contributions from employees into the scheme	437	0
(1,610)	(11,520)	Benefits/transfer Paid	(1,851)	(12,440)
(49)	0	Administration Expenses	(51)	0
41,630	0	Closing value of scheme assets	40,950	0

LGPS 2023/24 £'000	FFPF 2023/24 £'000	Movement in the Fair Value of Scheme Liabilities	LGPS 2024/25 £'000	FFPF 2024/25 £'000
(40,312)	(225,390)	Opening Balance as at 1 April	(40,392)	(231,610)
(1,055)	(1,620)	Current Service Cost	(1,033)	(1,870)
0	(800)	Transfers In	0	(10)
(1,906)	(10,310)	Interest Costs	(1,944)	(10,810)
(419)	(1,610)	Contributions from scheme participants	(437)	(2,070)
		Remeasurement Gains and losses		
331	(7,810)	Actuarial Gains/losses- experience	51	60
1,359	4,410	Actuarial Gains/losses arising from changes in demographic assumptions	6,176	530
1,610	11,520	Actuarial Gains/losses arising from changes in financial assumptions	1,851	25,240
0	0	Benefits/ transfers paid	0	12,440
0	0	Curtailments	0	0
0	0	Past Service Cost	0	0
(40,392)	(231,610)	Balance at 31 March	(35,728)	(208,100)

Local Government Pension Scheme: Assets Comprised Of:

Quoted 2023/24 £'000	Fair Value of Scheme Assets	Quoted 2024/25 £'000
	Cash & Cash Equivalents	
2,122	Cash Accounts	0
0	Temporary Investments	0
2,122	Subtotal Cash and Cash Equivalents	0
	Equity Securities	
5,787	Global Quoted	6,296
0	Emerging Markets	0
5,787	Subtotal Equities	6,296
	Bonds	
4,205	Overseas Other	5,409
10,990	Liability-Driven Investment	9,685
15,195	Subtotal Bonds	15,094
	Property	
1,748	UK	1,550
167	Overseas	209
1,915	Subtotal Property	1,759
	Alternatives	
2,040	Hedge Funds	6,298
6,119	Private Equity	3,239
2,498	Infrastructure	123
167	Timber and Agriculture	4,808
4,746	Diversified Growth Fund	1,380
1,041	Private Credit	1,953
16,611	Subtotal Alternatives	17,801
41,630	Totals Assets	40,950

All scheme assets have quoted prices in active markets

Basis for Estimating Assets and Liabilities

Liabilities have been valued on an actuarial basis using the projected unit method which assesses the future liabilities of the fund discounted to their present value.

The Firefighters' Scheme has been valued by the Government Actuary's Department.

The LGPS liabilities have been valued by Mercer, an independent firm of actuaries and are based on the latest full valuation of the scheme as at 1 April 2023.

2023/24	LGPS	2024/25
	Mortality Assumptions	
	Longevity at retirement for current pensioners:	
21.0	Men	21.1
23.5	Women	23.6
	Longevity at retirement for future pensioners	
22.4	Men	22.4
25.3	Women	25.4
	Other Assumptions	
2.6%	Rate of Inflation	2.6%
3.9%	Rate of Increase in Salaries	3.9%
2.7%	Rate of Increase in Pensions	2.7%
4.9%	Rate of Discounting Scheme Liabilities	5.9%
2.6%	CARE Revaluation Rate	2.6%

2023/24	Firefighters Pension Scheme	2024/25
	Mortality Assumptions	
	Longevity at retirement for current pensioners:	
21.3	Men	21.3
21.3	Women	21.3
	Longevity at retirement for future pensioners	
22.9	Men	22.7
22.9	Women	22.7
	Other Assumptions	
2.6%	Rate of Inflation	2.7%
3.9%	Rate of Increase in Salaries	3.5%
2.6%	Rate of Increase in Pensions	2.7%
4.8%	Rate of Discounting Scheme Liabilities	5.7%
3.9%	CARE revaluation rate	3.5%

The estimation of the defined benefit obligations is sensitive to the actuarial assumptions set out in the above tables.

The sensitivity analyses below are based on reasonably possible changes to assumptions at the reporting period end, with each assumption varied independently. For example, longevity assumes changes in life expectancy for men and women. While such isolated changes are unlikely in practice, and some assumptions may be interrelated, the estimates follow the scheme's accounting policies—using the projected unit credit method on an actuarial basis. The methods and assumptions used are consistent with those applied in the previous period.

Impact of Assumptions on the obligation - LGPS

	As Reported	+0.5% p.a. discount	+0.25% p.a. inflation	+0.25% p.a. pay growth	1 year increase in life expectancy	+/-1% change in 2023/24 investment returns	
	£000	£000	£000	£000	£000	+1% £000	-1% £000
Liabilities	35,728	33,166	37,082	36,010	36,440	35,728	35,728
Assets	(40,950)	(40,950)	(40,950)	(40,950)	(40,950)	(41,356)	(40,544)
Deficit (surplus)	(5,222)	(7,784)	(3,868)	(4,940)	(4,510)	(5,628)	(4,816)
Projected Service Cost for next year	771	667	827	771	791	771	771
Projected Net Interest Cost for next year	(327)	(519)	(247)	(310)	(285)	(351)	(303)

	As Reported	Discount rate on liabilities 0.5% increase	Increase in salaries 0.5% increase	Life expectancy 1 year increase	Increase in pensions 0.5% increase
	£000	£000	£000	£000	£000
FFPS	Impact (208,100)	-6.50% (194,574)	1% (210,181)	2.50% (213,303)	6.5% (221,627)

Impact on the Authority's Cashflow

The cost of retirement benefits in the reported cost of services is recognised when they are earned by employees, rather than when the benefits are eventually paid as pensions. However, the charge that is required to be made against the levy is based on the cash payable in the year, so the real cost of post-employment/ retirement benefits is reversed out of the General Fund via the Movement in Reserves Statement. The following transactions have been made in the Comprehensive Income and Expenditure Statement and the General Fund balance via the Movement in Reserves Statement during the year.

31 NATURE AND EXTENT OF RISKS ARISING FROM FINANCIAL INSTRUMENTS

The Authority has adopted the CIPFA Code of Practice on Treasury Management which ensures the Authority has measures in place to manage financial risks. The Authority's Treasury Management Strategy for 2024/25 was formally approved at a meeting on 15 April 2024. The Strategy sets out the Prudential Indicators (PI's) for the year. During the year, quarterly reports detail the progress against the strategy and if necessary a revision of the PI's.

At year end, a final report sets out how the Authority has performed during the year. How the Authority manages risks arising from financial instruments is detailed in the treasury reports presented to the Audit Committee and can be accessed from North Wales Fire and Rescue Service website - www.northwalesfire.gov.wales

The Authority's activities expose it to a variety of financial risks, including:

Credit Risk

This is the possibility that other parties might fail to pay amounts due to the Authority.

The highest credit risk is for investments and these are managed through the Treasury Management Strategy, which sets out the parameters for the management of risks associated with Financial Instruments and emphasises that priority is to be given to security and liquidity, rather than yield. The Authority's policy on treasury investments is to place short term cash surpluses into bank call accounts until required. The Authority does not have long term investments. Cash that is likely to be spent in the near term is invested securely with selected high-quality banks, to minimise the risk of loss.

Liquidity Risk

This is the possibility that the Authority might not have funds available to meet its commitments to make payments.

The Authority monitors its cash balance to ensure that cash is available as needed. If unexpected movements happen, the Authority has ready access to borrowings from the Public Works Loan Board and so there is no perceived risk that the Authority will be unable to raise finance to meet its commitments under financial instruments. Instead, the risk is that the Authority will be bound to replenish a significant proportion of its borrowings at a time of unfavourable interest rates.

Market Risk (Interest rate risk)

This is the possibility that financial loss might arise for the Authority as a result of changes in such measures as interest rates and stock market movements.

As at 31 March 2025, the Authority held market loans of £5m (2023/24: nil).

The Authority is exposed to interest rate movements on its borrowings and investments. Movements in interest rates have a complex impact on the Authority, depending on how variable and fixed interest rates move across differing financial instrument periods. For instance, a rise in variable and fixed interest rates would have the following effects:

- Borrowings at variable rates – the interest expense charged to the Comprehensive Income and Expenditure Statement will rise;
- Borrowings at fixed rates – the fair value of the borrowing will fall (no impact on revenue balances);
- Investments at variable rates – the interest income credited to the Comprehensive Income and Expenditure Statement will rise; and
- Investments at fixed rates – the fair value of the assets will fall (no impact on revenue balances).

Borrowings are not carried at fair value on the balance sheet, so nominal gains and losses on fixed rate borrowings would not impact on the Surplus or Deficit on the Provision of Services or Other Comprehensive Income and Expenditure. However, changes in interest payable and receivable on variable rate borrowings and investments will be posted to the Surplus or Deficit on the Provision of Services and affect the General Fund Balance.

The Authority has a number of strategies for managing interest rate risk. During periods of falling interest rates, and where economic circumstances make it favourable, fixed rate loans will be repaid early to limit exposure to losses.

32 CONTINGENT LIABILITY

Pension Claims

Following a lengthy legal process, the judgment in the case of O'Brien vs Ministry of Justice was issued during 2019. This found that the decision to limit the period from which a part-time employee could join the pension scheme was erroneous and eligible employees should be permitted to join the relevant scheme with effect from the start of their contracts.

This judgment has national implications for staff who are employed as retained firefighters whose contract of employment commenced before 6 April 2000 including those who have not yet previously received the full opportunity to purchase past service to which they were entitled.

The Welsh Ministers have made amendments to the Firefighters Pension Scheme 2007 (Modified) to provide a mechanism for this matter to be addressed. The Firefighters' Pension Schemes and Compensation Scheme (Amendment) (Wales) Order 2024, was made and laid in January and came into force on 1 February 2024. All eligible persons will be afforded the opportunity of buying back pension entitlements within the timescales specified within the order.

The full financial impact of the updated regulations cannot be fully calculated although an estimate has been included within the 2020 valuation of the Authority's pension scheme liabilities undertaken by the Government's Actuary Department (GAD).

Airwave Emergency Service Contract

In October 2021, the Competition and Markets Authority (CMA) opened an investigation into mobile radio network services amid concerns that the market might not be working well. The investigation found that UK emergency services currently have no choice but to continue using Motorola's Airwave Network, due to a lack of alternative providers. As such, Motorola charged the Home Office – which negotiates contracts on behalf of emergency services – prices well above competitive levels, resulting in higher costs to the emergency services.

To reduce these costs, the CMA imposed a price cap in July 2023, which brought the price down to a level that would be expected in a well-functioning and competitive market.

This decision was appealed by Motorola Solutions Limited and in December 2023, the Competition Appeal Tribunal, in a unanimous decision, has upheld the CMA's finding that Motorola was excessively pricing due to its virtually unconstrained monopoly on providing communications network services to the UK emergency services.

Motorola Solutions has appealed the matter to the UK Court of Appeal which as of the 30 January 2025 unanimously dismissed Motorola's application for permission to appeal on both of its pleaded grounds, in which it claimed that the Competition and Markets Authority (CMA) had made errors in assessing competition in the relevant market and the profitability of the Airwave Network in 2021.

As a result of the price cap, there was a reduction in costs of £526k in 2024/25 (2023/24: £262k), however as Motorola can appeal at the European Court of Human Rights, this amount has been set aside in earmarked reserves, in the event that this has to be refunded.

Legal Related Matters

The Authority may be subject to challenge on a range of issues that at any point in time may be subject to litigation. At the year-end all known claims are reviewed and assessed. Where it is assessed that there is a probable liability and a reasonable estimate can be made a provision is recognised for amounts that would fall to the Authority. Where the probability of settlement is low or the liability cannot be reasonably estimated a liability is not recognised. There remains the possibility however of future claims arising as a result of past actions that are either unknown at the Balance Sheet date or where the outcome is so unpredictable in terms of outcome or financial liability that no reliable estimate of liability can be made. The Authority maintains a reserve for such matters.

Employment Tribunal

At the year-end there were no matters that required financial recognition.

33 CONTINGENT ASSET

Truck Cartel

In July 2016 the European Commission fined European truck manufacturers €2.9 billion for price fixing and other cartel activities between 1991 and 2001. DAF, Daimler, Iveco, MAN, and Volvo/Renault acknowledged their guilt and confirmed they did the following:

- At Senior HQ management level, fixed gross and sometimes net list prices.
- Aligned gross list prices in Europe including the UK at the start of the cartel.
- Reduced rebates when the Euro was introduced.
- Delayed introduction of more fuel efficient Euro 3, 4, 5 and 6 technologies.
- Agreed the cost that operators should pay for Euro technologies.

Scania did not participate in the settlement procedure and the European Commission issued its decision finding that Scania participated in the same cartel and fining Scania €880 million. Scania has exhausted its appeals against the Decision, which were unsuccessful.

The matter involves any trucks of 6 tonnes and over, purchased outright, financed or leased between 1997 and 2011. A public sector legal action is now ongoing to recoup some of the money lost due to this cartel price fixing. The specific value, percentage or likelihood have not yet been quantified and timescales remain unclear. However, the trial for the Second Wave Trucks Claims is set for September 2026.

Under the Litigation Funding Agreement, only the VAT is payable by the Authority for the legal costs. Current payments for 2024/25 totalled £5,268 (2023/24: £67).

FIREFIGHTERS' PENSION FUND ACCOUNT

Firefighters Pension Fund Account for the year ended 31 March 2025

This statement presents the financial position of the Firefighters' Pension Fund Account, detailing whether the Authority has a payable or receivable balance with the Welsh Government to ensure the account is balanced. Additionally, it provides information on the net assets of the fund.

2023/24 £'000		2024/25 £'000
	Contributions Receivable:	
(4,055)	Employer normal contributions	(4,906)
0	Employer ill health charge	(156)
0	Employer backdated contributions	0
(1,928)	Members normal contributions	(2,067)
(122)	Members backdated contributions	(88)
(798)	Transfers In	(321)
(6,903)	Total Contributions	(7,538)
	Benefits Payable:	
9,005	Pension Payments	9,737
1,596	Commutation of Pensions and Lump Sum retirement benefits	2,593
0	Backdated Commutation Payments	0
	Payments to and on account of leavers:	
195	Transfers out	88
10,796	Total Benefits	12,418
3,893	Deficit for the year before grants receivables from the Welsh Government	4,880
(3,893)	Top Up grant payable to/(from) Welsh Government	(4,880)
0	Net Amount (Payable)/Receivable for Year	0

Net Assets Statement as at 31 March 2025

2023/24 £'000		2024/25 £'000
	Current assets	
(2,320)	Amount owed (from)/to the General Fund	(655)
(2,320)	Total Current Assets	(655)
	Current Liabilities	
2,320	Top Up grant payable to/(from) Welsh Government	655
2,320	Total Current Liabilities	655

Notes to the Firefighters' Pension Fund Account

The Fund, established on 1 April 2007 under the Firefighters' Pension Scheme (Wales) Order 2007, encompasses the 1992, 2007, and 2015 Firefighters' Pension Schemes and is administered by the Authority. This is an unfunded scheme with no investment assets. Each year, the fund is balanced to zero through the receipt of a pension top-up grant from the Welsh Government in the event of a deficit, or by remitting any surplus back to the Welsh Government.

Employee and employer contributions are paid into the Fund, from which payments to pensioners are made. Employee's and employer's contribution levels are based on percentages of pensionable pay set nationally by the Welsh Government and subject to revaluation by the Government Actuary's Department (GAD) on a four yearly basis or as otherwise directed by HM Treasury.

Transfers in to the scheme are a transfer of pension benefits from another pension scheme, for new or existing employees and transfers out are transfer of benefits for employees who have left the Authority and joined another pension scheme.

The Authority is responsible for paying the employer's contributions into the fund. These are the costs that are included in the accounts for the Authority.

At the beginning of the financial year an assessment is made as to the amount of Top Up grant required from the Welsh Government. The estimate includes an assessment of the number of firefighters due to retire within the year, based on age and years' service.

Contribution Rates

On 1 April 2022, all scheme participants were transferred into the 2015 scheme. As per the Firefighters' Pension Regulations, the employer's contribution rate for the 2015 scheme will be 31.0% of pensionable pay, effective from 1 April 2024 (up from 27.3% in 2023/24). The employee contribution rate will vary based on the pensionable pay banding detailed below:

Pensionable Pay Band	2024/25 Contribution Rate %
Up to £27,818	11.0
£27,819 to £51,515	12.9
£51,516 to £142,500	13.5
More than £142,501	14.5

The Firefighters' Pension Fund Account does not take account of liabilities for pensions and other benefits after the period end as this is the responsibility of the Authority. Details of the long term pension obligations can be found in Note 30 to the core financial statements.

Appendix 1

ACCOUNTING POLICIES**1. GENERAL PRINCIPLES**

The Statement of Accounts summarises the Authority's transactions for the 2024/25 financial year and its position at the year-end of 31 March 2025. The Authority is required to prepare an annual Statement of Accounts by the Accounts and Audit (Wales) Regulations 2014, which require the accounts to be prepared in accordance with proper accounting practices. These practices, under section 21 of the Local Government Act 2003, primarily comprise of the Code of Practice on Local Authority Accounting in the United Kingdom 2024/25 supported by International Financial Reporting Standards (IFRS).

The accounting convention adopted in the Statement of Accounts is principally historical cost, modified by the revaluation of certain categories of non-current assets and financial instruments.

2. ACCRUALS OF INCOME AND EXPENDITURE

In the revenue accounts, income and expenditure are accounted for net of VAT (unless the VAT is irrecoverable) in the year they arise, not when cash payments are made or received. This aligns with IAS 1, which mandates the accrual basis of accounting to ensure comparability and a true and fair view of financial performance and position.

- **Expenses:** Recorded when services are received, not when payments are made. Income from customers is recognised when goods or services are provided.
- **Supplies:** Recorded as expenditure when consumed. If received but not yet used, they are carried as inventories on the Balance Sheet.
- **Interest:** Accounted for using the effective interest rate method, rather than the cash flows specified by the contract.
- **Debtors and Creditors:** If revenue and expenditure are recognised but cash has not been received or paid, a debtor or creditor is recorded in the Balance Sheet. If debts may not be settled, the balance of debtors is written down, and a charge is made to revenue for the income that might not be collected.

3. CASH AND CASH EQUIVALENTS

Cash includes cash in hand and deposits with financial institutions that can be withdrawn without penalty within 24 hours. Cash equivalents are investments that mature within three months of acquisition and can be easily converted to cash with minimal risk.

In the Cash Flow Statement, cash and cash equivalents are shown net of bank overdrafts that are repayable on demand and are part of the Authority's cash management.

4. **PRIOR PERIOD ADJUSTMENTS, CHANGES IN ACCOUNTING POLICIES AND ESTIMATES AND ERRORS**

Prior period adjustments may occur due to changes in accounting policies or to correct material errors. Changes in accounting estimates are accounted for prospectively, affecting the current and future years, and do not result in prior period adjustments.

Changes in accounting policies are made only when required by proper accounting practices or when they provide more reliable or relevant information about the Authority's financial position or performance. These changes are applied retrospectively (unless stated otherwise) by adjusting opening balances and comparative amounts for prior periods as if the new policy had always been applied. Material errors discovered in prior period figures are corrected retrospectively by amending opening balances and comparative amounts for the prior period.

5. **CHARGES TO REVENUE FOR NON-CURRENT ASSETS**

Services, support services, and trading accounts are charged an estimate of the cost of holding non-current assets during the year. This includes:

- **Depreciation:** Attributable to the assets used by the relevant service.
- **Revaluation and Impairment Losses:** On assets used by the service where there are no accumulated gains in the revaluation reserve to offset the losses.
- **Amortisation:** Of intangible assets attributable to the service.

The Authority is not required to raise a levy to fund these costs. Instead, it makes an annual contribution from revenue towards reducing its overall borrowing requirement, calculated on a prudent basis. Depreciation, revaluation and impairment losses, and amortisation are replaced by this contribution in the General Fund balance (MRP) through an adjusting transaction with the capital adjustment account in the Movement in Reserves Statement.

6. **EMPLOYEE BENEFITS**

Benefits payable during employment

Short-term employee benefits are those due to be settled within 12 months of the year-end and include wages, salaries, paid leave, bonuses, and non-monetary benefits (e.g., cars). These are recognised as expenses in the year employees provide services to the Authority.

An accrual is made for holiday entitlements (or any form of leave, e.g., time off in lieu) earned but not taken before the year-end, which employees can carry forward to the next financial year. This accrual is made at the wage and salary rates applicable in the following accounting year. The accrual is charged to the surplus or deficit on the provision of services but then reversed out through the Movement in Reserves Statement to the accumulated absences account, ensuring holiday entitlements are charged to revenue in the year the leave is taken.

Post-Employment Benefits

Employees of the Authority are members of two separate pension schemes:

- **Firefighters' Pension Scheme:** Administered by Dyfed Pension Fund, Carmarthenshire County Council.
- **Local Government Pension Scheme:** Administered by Clwyd Pension Fund, Flintshire County Council.

Both schemes provide defined benefits (retirement lump sums and pensions) earned as employees work for the Authority.

Firefighters' Pension Scheme (FFPS)

The Firefighters' Pension Scheme is an unfunded defined benefits scheme with no assets or investment income.

- **Liabilities:** Included in the Balance Sheet on an actuarial basis using the projected unit method, based on assumptions about mortality rates, employee turnover, and projected earnings.
- **Discount Rate:** Liabilities are discounted to current prices using a rate based on Government bond yields plus an additional margin.

Service cost:

- **Current Service Cost:** Increase in liabilities from service earned in year, allocated in the CIES to the services for which employees worked.
- **Past Service Cost:** Increase in liabilities from scheme amendments or curtailments related to earlier years, debited to the Surplus or Deficit on the Provision of Services in the CIES.
- **Net Interest:** Expense that arises from the passage of time on the net defined benefit liability. It is calculated by applying the discount rate to the net defined benefit liability at the beginning of the period. This expense is charged to the Financing and Investment Income and Expenditure line in the Comprehensive Income and Expenditure Statement. Essentially, it represents the interest cost of having a pension liability over time.

Remeasurements:

- **Actuarial Gains and Losses:** Changes in net pension liability due to updated assumptions or events not matching previous actuary assumptions, charged to the Pensions Reserve as Other Comprehensive Income and Expenditure.
- **Contributions paid to the Fund:** Cash paid as employer's contributions to the pension fund in settlement of liabilities; not accounted for as an expense.

In relation to retirement benefits, statutory provisions require the General Fund Balance to be charged with the amount payable by the Authority to the pension funds or directly to pensioners in the year, not the amount calculated according to the relevant accounting standards. In the Movement in Reserves Statement, this means that there are transfers to

and from the Pensions Reserve to remove the notional debits and credits for retirement benefits and replace them with debits for the cash paid to the pension fund and pensioners and any such amounts payable but unpaid at the year-end. The negative balance that arises on the Pensions Reserve thereby measures the beneficial impact to the General Fund of being required to account for retirement benefits on the basis of cash flows rather than as benefits are earned by employees.

Local Government Pension Scheme (LGPS)

The Local Government Pension Scheme is accounted for as a defined benefits scheme:

- **Liabilities:** Included in the Balance Sheet on an actuarial basis using the projected unit method, based on assumptions about mortality rates, employee turnover, and projected earnings.
- **Discount Rate:** Liabilities are discounted to current prices using a rate based on corporate bonds.
- **Assets:** The assets of the Clwyd Pension Fund attributable to the Authority are included in the Balance Sheet at their fair value:
 - Quoted securities: current bid price
 - Unquoted securities: professional estimate
 - Unitised securities: current bid price
 - Property: market value

The change in the net pensions liability is analysed into the following components:

Service cost comprising:

- **Current Service Cost:** The increase in liabilities due to years of service earned this year, allocated to the services for which the employees worked in the Comprehensive Income and Expenditure Statement.
- **Past Service Cost:** The increase in liabilities due to a scheme amendment or curtailment related to years of service earned in earlier years, debited to the surplus or deficit on the provision of services in the Comprehensive Income and Expenditure Statement.
- **Net Interest on the Net Defined Benefit Liability (Asset):** The change during the period in the net defined benefit liability (asset) due to the passage of time, charged to the financing and investment income and expenditure line of the Comprehensive Income and Expenditure Statement. This is calculated by applying the discount rate used to measure the defined benefit obligation at the beginning of the period to the net defined benefit liability (asset) at the beginning of the period, considering any changes during the period due to contributions and benefit payments.

Remeasurements comprising:

- **Return on Plan Assets:** Excluding amounts included in net interest on the net defined benefit liability (asset), charged to the pensions reserve as other comprehensive income and expenditure.

- **Actuarial Gains and Losses:** Changes in the net pensions liability due to events not coinciding with assumptions made at the last actuarial valuation or updates to the actuaries' assumptions, charged to the pensions reserve as other comprehensive income and expenditure.
- **Contributions Paid to the Clwyd Pension Fund:** Cash paid as employer's contributions to the pension fund in settlement of liabilities, not accounted for as an expense.

Statutory Provisions

In relation to retirement benefits, statutory provisions require the General Fund balance to be charged with the amount payable by the Authority to the pension fund or directly to pensioners in the year, not the amount calculated according to the relevant accounting standards. This means there are transfers to and from the pensions reserve to remove the notional debits and credits for retirement benefits and replace them with debits for the cash paid to the pension fund and pensioners and any such amounts payable but unpaid at the year-end. The negative balance on the pensions reserve measures the beneficial impact to the General Fund of accounting for retirement benefits on the basis of cash flows rather than as benefits are earned by employees.

Discretionary Benefits:

The Authority has restricted powers to make discretionary awards of retirement benefits in the event of early retirements. Any liabilities estimated to arise from such awards are accrued in the year of the decision and accounted for using the same policies as applied to the Local Government Pension Scheme.

7. EVENTS AFTER THE REPORTING PERIOD

Events after the Balance Sheet reporting period are those events, both favourable and unfavourable, that occur between the end of the Balance Sheet date and the date when the statement of accounts are authorised for issue. These events are classified into two types:

- **Events Providing Evidence of Conditions at the End of the Reporting Period -** If the event provides evidence of conditions that existed at the end of the reporting period, the statement of accounts is adjusted to reflect such events.
- **Events Indicative of Conditions Arising After the Reporting Period -** If the event indicates conditions that arose after the reporting period, the statement of accounts is not adjusted. However, if these events would have a material effect, their nature and estimated financial impact are disclosed in the notes.

8. FINANCIAL INSTRUMENTS

A Financial instrument is 'any contract that creates a financial asset for one entity and a financial liability or equity instrument for another'.

Initial Measurement and Carrying Amount:

- **Financial Liabilities (Loans):** Initially measured at fair value and carried at amortised cost. The annual interest paid is based on the carrying amount of the loan multiplied by the effective interest rate.
- **Financial Assets (Investments):** Initially measured at fair value and carried at amortised cost. The annual interest received is based on the carrying amount of the investment multiplied by the effective interest rate.

For all loans and investments, the amounts presented in the Balance Sheet are the principal outstanding plus any accrued interest for the year.

Recognition and Measurement

- **Financial Liabilities:** Recognised on the Balance Sheet when the Authority becomes a party to the contractual provisions of a financial instrument. Initially measured at fair value and carried at amortised cost. Annual charges for interest payable are based on the carrying amount of the liability multiplied by the effective interest rate. The effective interest rate is the rate that exactly discounts estimated future cash payments over the life of the instrument to the amount at which it was originally recognised.

For most of the borrowings that the Authority has, this means that the amount presented in the Balance Sheet is the outstanding principal repayable (plus accrued interest); and interest charged to the CIES is the amount payable for the year according to the loan agreement.

Financial assets

Financial assets are classified based on a classification and measurement approach that reflects the business model for holding the financial assets and their cash flow characteristics. The Authority holds financial assets measured at:

- Amortised Cost
- Fair Value Through Profit or Loss (FVPL)

The Authority's business model is to hold investments to collect contractual cash flows, so financial assets are classified as amortised cost.

Financial assets measured at amortised cost

Financial assets measured at amortised cost are recognised on the Balance Sheet when the Authority becomes a party to the contractual provisions of a financial instrument. They are initially measured at fair value.

These assets are subsequently measured at their amortised cost. Annual credits to the financing and investment income and expenditure line in the Comprehensive Income and Expenditure Statement (CIES) for interest receivable are based on the carrying amount of the asset multiplied by the effective rate of interest for the instrument.

For most financial assets held by the Authority, the amount presented in the Balance Sheet is the outstanding principal receivable (plus accrued interest), and the interest credited to the CIES is the amount receivable for the year according to the loan agreement.

Any gains and losses that arise on the derecognition of a financial asset are credited or debited to the financing and investment income and expenditure line in the CIES.

9. FOREIGN CURRENCY TRANSACTIONS

When the Authority enters into a transaction in a foreign currency, the transaction is converted into sterling at the exchange rate on the date the transaction occurs. If there are amounts in foreign currency outstanding at the year-end, they are reconverted at the spot exchange rate on 31 March. Any resulting gains or losses are recognised in the financing and investment income and expenditure line in the Comprehensive Income and Expenditure Statement

10. ACCOUNTING FOR GOVERNMENT GRANTS

Government grants and third-party contributions and donations are recognised as due to the Authority when there is reasonable assurance that:

- the Authority will comply with the conditions attached to the payments, and
- the grants or contributions will be received.

Recognition: Amounts recognised as due are not credited to the Comprehensive Income & Expenditure Statement until the conditions attached to the grant or contribution have been satisfied.

Unsatisfied Conditions: Monies advanced as grants and contributions for which conditions have not been satisfied are carried in the Balance Sheet as creditors.

Satisfied Conditions: When the conditions are satisfied, the grant or contribution is credited to the relevant service line (for attributable revenue grants and contributions) or to Taxation & Non-specific Grant Income (for non-ring fenced revenue grants and all capital grants) in the Comprehensive Income & Expenditure Statement.

Where capital grants are credited to the Comprehensive Income & Expenditure Statement, they are reversed out of the General Fund Balance in the Movement in Reserves Statement. Where the grant has yet to be used to finance capital expenditure, it is posted to the Capital Grants Unapplied Reserve. Where it has been applied, it is posted to the Capital Adjustment Account. Amounts in the Capital Grants Unapplied Reserve are transferred to the Capital Adjustment Account once they have been applied to fund capital expenditure

11. INTANGIBLE ASSETS

Expenditure on non-monetary assets that do not have physical substance but are controlled by the Authority as a result of past events, such as software licences, is capitalised when it is expected that future economic benefits or service potential will flow from the intangible asset to the Authority.

Intangible assets are initially measured at cost. They are only revalued if their fair value can be determined by reference to an active market. In practice, no intangible asset held by the Authority meets this criterion, so they are carried at cost less accumulated depreciation and any accumulated impairment loss.

The depreciable amount of an intangible asset is amortised over its useful life to the relevant service lines in the Comprehensive Income and Expenditure Statement. An asset is tested for impairment whenever there is an indication that it might be impaired. Any losses recognised are posted to the relevant service lines in the Comprehensive Income and Expenditure Statement. Any gain or loss arising on the disposal or abandonment of an intangible asset is posted to the other operating expenditure line in the Comprehensive Income and Expenditure Statement.

When expenditure on intangible assets qualifies as capital expenditure for statutory purposes, amortisation, impairment losses, and disposal gains and losses are not allowed to impact the General Fund balance. These gains and losses are reversed out of the General Fund balance in the Movement in Reserves Statement and posted to the capital adjustment account. For any sale proceeds greater than £10,000, the amounts are posted to the capital receipts reserve.

12. INVENTORIES

Inventories are included in the Balance Sheet at the lower of cost and net realisable value. The cost of inventories is assigned using the First-In, First-Out (FIFO) costing formula

13. LEASES

From 1 April 2024, IFRS 16 requires that most leases be accounted for using the acquisition model. This means recognising a right-of-use asset on the balance sheet, reflecting the lessee's right to use the leased item.

Leases that were classified as finance leases as of 31 March 2024—where the lease transfers substantially all the risks and rewards of ownership to the lessee—will continue to be treated as finance leases.

All other leases previously classified as operating leases will, subject to any applicable exemptions, be reclassified as right-of-use assets with a corresponding lease liability recorded on the balance sheet.

Where a lease includes both land and buildings, each component is assessed separately for classification purposes.

Additionally, arrangements that do not legally constitute a lease but grant the right to use a specific asset in exchange for payment will also fall under this policy, provided the arrangement depends on the use of identified assets.

Finance Leases

Leases are classified as finance leases when they transfer substantially all risks and rewards of ownership to the lessee; all others are treated as operating leases.

For finance leases, the leased asset is recognised on the Balance Sheet at the lower of its fair value or the present value of minimum lease payments, with a corresponding lease liability. Any initial direct costs and lease premiums are added to the asset or used to reduce the liability. Contingent rents are expensed as incurred.

Lease payments are split between:

- A capital repayment reducing the lease liability, and
- A finance charge recognised in the Comprehensive Income and Expenditure Statement.

Assets under finance leases follow the same accounting policies as other property, plant, and equipment. Depreciation is charged over the lease term unless ownership transfers to the Authority.

Instead of raising a levy for depreciation or impairment losses, the Authority makes an annual revenue contribution towards the capital investment, in line with statutory requirements. This is reflected through an adjustment between the General Fund and the Capital Adjustment Account.

Operating Leases

The Authority has adopted IFRS 16 from 1 April 2024. Property, Plant and Equipment that fall under the scope of IFRS 16 are now classified as right-of-use assets on the balance sheet.

Where the operating lease is considered as low value (below £10k asset original cost) or the lease has less than 12 months to run, then these will not be recognised on the balance sheet. In these instances rentals paid under operating leases are charged to the CIES as an expense to the services benefitting from the use of the leased property, plant, or equipment. Charges are made on a straight-line basis over the life of the lease, even if this does not match the pattern of payments (e.g., a rent-free period at the start of the lease).

IFRS16: The Authority's IFRS16 policy will apply to those leases where the Authority is the lessee and the following approach will be adopted.

Low-cost exemption: The low-cost exemption is initially set at £10,000, in line with the de-minimus expenditure level for Property, Plant & Equipment. This will be reviewed annually and adjusted using the March CPI rate, rounded to the nearest £1,000. Leases below this value will be excluded from IFRS16.

Use of portfolio of leases with reasonably similar characteristics: The Authority will apply the portfolio expedient for photocopiers and similar machines (e.g., MFDs, franking machines). These leases have similar characteristics in function, cost, and agreements, and will fall within the low-cost exemption.

Existing contracts at date of implementation: The Authority will not reassess existing contracts as of the implementation date (1 April 2024) to determine if they contain a lease. New contracts from this date will be assessed for lease arrangements.

Leases for intangible assets: IFRS16 will not be applied to lease arrangements for intangible assets (e.g., software licences).

Leases with less than 1-year remaining life at the implementation date: The short-life exemption will be applied to existing leases with less than 1 year remaining at the implementation date. The existing accounting treatment will continue unless there is a modification after the implementation date, in which case the lease will be considered a new lease.

The Authority as Lessor

Finance Leases Assets disposed of under finance leases shall be written out of the Balance Sheet and an amount recognised in the Balance Sheet as a receivable debtor that reflects the net investment in the lease as defined by the appropriate accounting standard.

The capital element of any rental due under a finance lease shall be accounted for as a capital receipt, the debtor and the equivalent liability being written down by that amount. The finance element shall be treated as revenue income.

14. PROPERTY PLANT AND EQUIPMENT

Assets that have physical substance and are used for producing or supplying goods or services, for rental to others, or for administrative purposes, and are expected to be used for more than one financial year, are classified as Property, Plant, and Equipment.

Recognition

Expenditure on acquiring, creating, or enhancing Property, Plant, and Equipment is capitalised on an accruals basis if it is probable that future economic benefits or service potential will flow to the Authority and the cost can be measured reliably. Expenditure that maintains but does not add to an asset's potential (e.g., repairs and maintenance) is charged as an expense when incurred.

A de-minimus expenditure level of £10,000 has been set for Property, Plant, and Equipment. Expenditure below this level will not be subject to capital accounting requirements. If an asset is revalued below £10,000, any associated expenditure and depreciation will be written out, and the asset will be removed from the Fixed Asset Register.

Measurement

Assets are initially measured at cost, which includes the purchase price, any costs necessary to bring the asset to its intended location and condition, and an initial estimate of dismantling and site restoration costs. The Authority does not capitalise borrowing costs incurred while assets are under construction. The cost of assets acquired other than by purchase is deemed to be their fair value.

Assets are carried on the Balance Sheet using the following measurement bases:

- Land & Buildings: Offices/Workshops – current value (Existing Use Value)
- Land & Buildings: Fire Stations – current value (Depreciated Replacement Cost)
- Assets under construction - historical cost
- All other assets - current value, determined as the amount that would be paid for the asset in its existing use (existing use value - EUV).

If there is no market-based evidence of current value due to the specialist nature of an asset, depreciated replacement cost (DRC) is used as an estimate of current value. For non-property assets with short useful lives or low values, depreciated historical cost is used as a proxy for current value.

Increases in valuations are credited to the revaluation reserve to recognise unrealised gains. Exceptionally, gains might be credited to the surplus or deficit on the provision of services if they reverse a loss previously charged to a service.

Where decreases in value are identified, they are accounted for by:

- where there is a balance of revaluation gains for the asset in the revaluation reserve, the carrying amount of the asset is written down against that balance (up to the amount of the accumulated gains)
- where there is no balance in the revaluation reserve or an insufficient balance, the carrying amount of the asset is written down against the relevant service line(s) in the Comprehensive Income and Expenditure Statement.

Impairments

Assets are assessed at each year-end for indications of impairment. If indications exist and the differences are material, the recoverable amount of the asset is estimated. If this is less than the carrying amount, an impairment loss is recognised for the shortfall.

Impairment losses are accounted for by writing down the carrying amount of the asset against any revaluation gains in the revaluation reserve (up to the amount of the accumulated gains). If there is no balance in the revaluation reserve or an insufficient balance, the carrying amount is written down against the relevant service line(s) in the Comprehensive Income and Expenditure Statement.

If an impairment loss is reversed subsequently, the reversal is credited to the relevant service line(s) in the Comprehensive Income and Expenditure Statement, up to the

amount of the original loss, adjusted for depreciation that would have been charged if the loss had not been recognised.

Depreciation

Depreciation is provided for all Property, Plant, and Equipment assets by systematically allocating their depreciable amounts over their useful lives. The useful economic life of assets is as follows:

Land	Infinite (no depreciation)
Buildings	Useful life of the property (as estimated by the valuer)
Buildings (leased)	Term of lease
Vehicles, Plant and Equipment	5 - 20 years
Intangible Assets	5 years

Depreciation is provided on a straight-line basis, with acquisitions being depreciated in the year following purchase. A full year's depreciation is charged in the year of disposal. Buildings are depreciated using componentisation, where an estimate is made of the useful life of each component of the building, and a weighted average is used to calculate the annual charge. The percentages used are:

Buildings – fire stations	2.05% - 2.22%
Buildings – offices/workshops	1.98% - 2.15%

Depreciation is charged within the income and expenditure account. This amount is credited to the General Fund Balance and has a neutral impact on the contributions made by the constituent authorities. The Authority is required to make an annual contribution from revenue towards reducing its overall borrowing requirement.

Depreciation, revaluation, and impairment losses and amortisation are replaced by the contribution from General Fund Balances (MRP) through an adjusting transaction with the Capital Adjustment Account in the Movement in Reserves Statement.

Revaluation gains are also depreciated, with the difference between current value depreciation and historical cost depreciation being transferred each year from the revaluation reserve to the capital adjustment account.

Disposals

When it becomes probable that the carrying amount of an asset will be recovered principally through a sale transaction rather than continued use, it is reclassified as an asset held for sale. The asset is revalued immediately before reclassification and then carried at the lower of this amount and fair value less costs to sell. Subsequent decreases to fair value less costs to sell are posted to the other operating expenditure line in the Comprehensive Income and Expenditure Statement. Gains in fair value are recognised only up to the amount of any previously recognised losses in the surplus or deficit on the provision of services. Depreciation is not charged on assets held for sale.

When an asset is disposed of or decommissioned, the carrying amount in the Balance Sheet is written off to the Other Operating Expenditure line in the Comprehensive Income and Expenditure Statement as part of the gain or loss on disposal. Receipts from disposals are credited to the same line in the Comprehensive Income and Expenditure Statement as part of the gain or loss on disposal. Any revaluation gains accumulated for the asset in the revaluation reserve are transferred to the capital adjustment account.

Amounts received for a disposal in excess of £10,000 are categorised as capital receipts. The balance of receipts remains within the capital receipts reserve and can only be used for new capital investment or set aside to reduce the Authority's underlying need to borrow. Receipts are appropriated to the reserve from the General Fund balance in the Movement in Reserves Statement.

The written-off value of disposals is not a charge against the levy, as the cost of non-current assets is fully provided for under separate arrangements for capital financing. Amounts are appropriated to the capital adjustment account from the General Fund balance in the Movement in Reserves Statement.

15. PROVISIONS, CONTINGENT LIABILITIES AND CONTINGENT ASSETS

Provisions

Provisions are made when an event has occurred on or before the Balance Sheet date:

- that gives the Authority a present obligation
- that probably requires settlement by a transfer of economic benefits or service potential, and
- where a reliable estimate can be made.

If it is unclear whether an event has occurred on or before the Balance Sheet date, it is considered a present obligation if, based on all available evidence, it is more likely than not that a present obligation exists at the Balance Sheet date. The obligation can be legal or constructive.

Provisions are charged as an expense to the appropriate service line in the Comprehensive Income and Expenditure Statement when the Authority has an obligation. They are measured at the best estimate of the expenditure required to settle the obligation at the Balance Sheet date, considering relevant risks and uncertainties. Estimated settlements are reviewed at the end of each financial year. If it becomes less probable that a transfer of economic benefits will be required (or a lower settlement is made), the provision is reversed and credited back to the relevant service.

If some or all of the payment required to settle a provision is expected to be recovered from another party (e.g., through an insurance claim), this is only recognised as income for the relevant service if it is virtually certain that reimbursement will be received if the Authority settles the obligation.

Contingent Liabilities

A contingent liability arises when an event has occurred that gives the Authority a possible obligation, which will only be confirmed by the occurrence or otherwise of uncertain future

events not wholly within the Authority's control. Contingent liabilities also arise in situations where a provision would otherwise be made, but either it is not probable that an outflow of resources will be required, or the amount of the obligation cannot be measured with sufficient reliability.

Contingent liabilities are not recognised in the Balance Sheet but are disclosed in a note to the accounts.

Contingent Assets

A contingent asset arises when an event has occurred that gives the Authority a possible asset, which will only be confirmed by the occurrence or otherwise of uncertain future events not wholly within the Authority's control.

Contingent assets are not recognised in the Balance Sheet but are disclosed in a note to the accounts where it is probable that there will be an inflow of economic benefits or service potential

16. RESERVES

The Authority sets aside specific amounts as reserves for future policy purposes or to cover contingencies. These reserves are created by transferring amounts out of the General Fund balance. When expenditure is financed from a reserve, it is charged to the appropriate service in that year, affecting the surplus or deficit on the provision of services in the Comprehensive Income and Expenditure Statement. The reserve is then transferred back into the General Fund balance, ensuring there is no net charge against the levy for the expenditure.

Certain reserves are maintained to manage the accounting processes for non-current assets, financial instruments, retirement, and employee benefits. These reserves do not represent usable resources for the Authority and are explained in the relevant policies.

17. VAT

VAT payable is included as an expense only to the extent that it is not recoverable from HMRC. VAT receivable is excluded from income



Gwasanaeth Tân ac Achub
Fire and Rescue Service



Report to	North Wales Fire and Rescue Authority
Date	21 July 2025
Lead Officer	Anthony Jones, Assistant Chief Fire Officer
Contact Officer	Mike Plant, Head of Planning, Performance and Transformation
Subject	Annual Governance Statement 2024-2025



PURPOSE OF REPORT

- 1 To present to North Wales Fire and Rescue Authority (the Authority) the draft Annual Governance Statement (AGS), as required by the Accounts and Audit (Wales) Regulations 2014. It was submitted to Audit Wales on 31 May 2025.

EXECUTIVE SUMMARY

- 2 The Accounts and Audit (Wales) Regulations 2014 requires the Authority to publish an AGS to demonstrate that;
 - Business is conducted in accordance with all relevant laws and regulations
 - Public money is safeguarded and properly accounted for;
 - Resources are used economically, efficiently and effectively to achieve agreed priorities which benefit local people
- 3 A draft version was submitted to Audit Wales by 31 May 2025 for their feedback, as required by the legislation.
- 4 This year's draft Statement is attached.

OBSERVATIONS FROM AUDIT COMMITTEE

- 5 The draft AGS was presented to the Audit Committee on 16 June 2025, where no observations were made.

RECOMMENDATION

- 6 It is recommended that Members:
 - i) **Approve the Draft Annual Governance Statement**

BACKGROUND

- 7 Since 2010/11 all local government bodies have been required, by the Accounts and Audit (Wales) Regulations 2014, to prepare an Annual Governance Statement which is published as part of the statutory accounts.
- 8 The purpose of the AGS is to assess and demonstrate that there is a sound system of corporate governance throughout the organisation.

INFORMATION

- 9 Unlike previous years, this year's AGS will have minimal design applied to it.

IMPLICATIONS

Well-being Objectives	This report links to the Authority's long-term well-being objectives and demonstrates the governance arrangements in place to enable North Wales Fire and Rescue Service (the Service) to provide emergency responses and prevention work well in to the future.
Budget	None
Legal	The AGS has been prepared in accordance with the prescribed standards.
Staffing	None
Equalities/Human Rights/ Welsh Language	None
Risks	A sound governance framework supports the Authority's risk management arrangements.



TÂN FIRE

**ATAL AMDDIFFYN YMATEB
PREVENTING PROTECTING RESPONDING**

North Wales Fire and Rescue Authority

ANNUAL GOVERNANCE STATEMENT ON INTERNAL CONTROL

For the year ended 31 March 2025

This Statement has been prepared in accordance with The Accounts and Audit (Wales) Regulations 2014 and the guidance produced by the Chartered Institute of Public Finance and Accountancy (CIPFA) and the Society of Local Authority Chief Executives (SOLACE), the 'Delivering Good Governance in Local Government Framework' 2016. The relationships between the seven principles for good governance in the public sector are illustrated below.

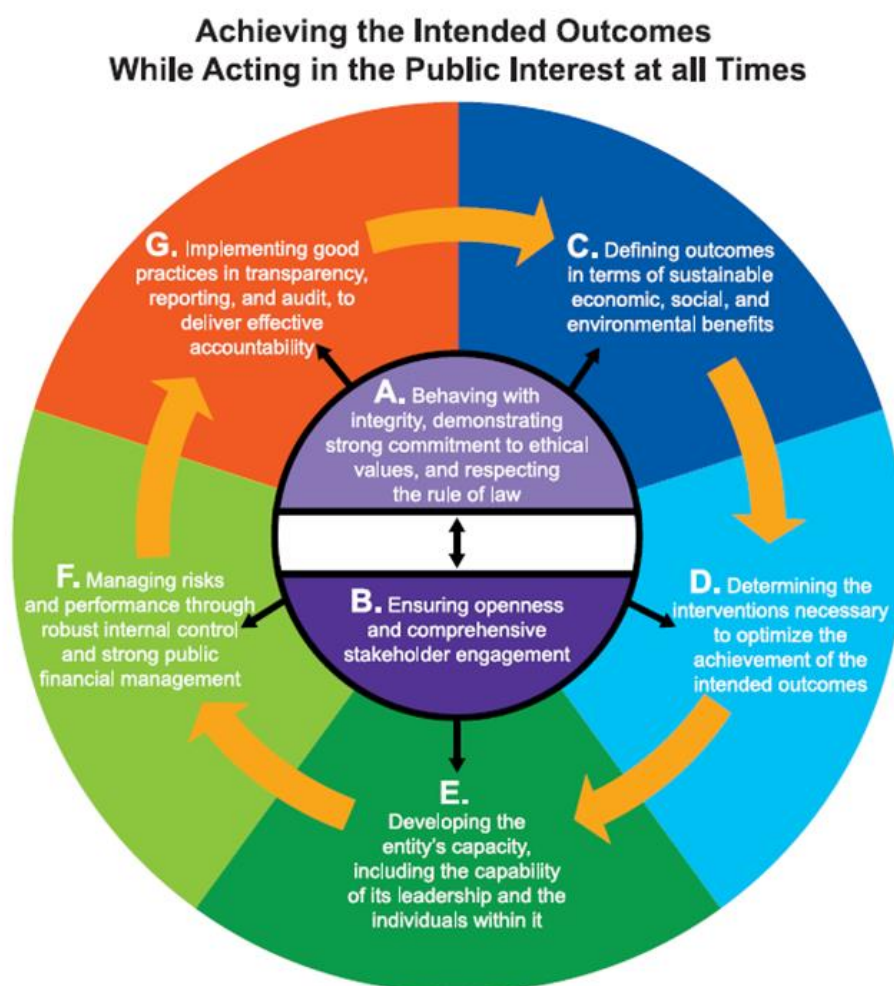


Fig. 1 How Principles for good governance relate to each other.

Source: international Framework-[Good Governance in the Public Sector](#)

This Annual Governance Statement explains how North Wales Fire and Rescue Authority (The Authority) has complied with the framework and its seven core principles of good governance to ensure that resources are directed in accordance with agreed policy and priorities.

Scope of Responsibility

North Wales Fire and Rescue Authority is responsible for ensuring that:

- business is conducted in accordance with all relevant laws and regulations
- public money is safeguarded and properly accounted for
- resources are used economically, efficiently, effectively and equitably to achieve agreed priorities which benefit local people.

In discharging its overall responsibility, Members and Senior Officers are responsible for putting in place appropriate arrangements for the governance of the Authority's affairs and the stewardship of the resources at its disposal, which includes arrangements for the management of risk.

Strategic leadership is given by and discharged through the Authority and its various Committees, panels and working groups, which enable Members to decide on issues affecting the running of the Authority, in accordance with the principles of openness and democratic accountability.

The Purpose of the System of Internal Control

To fulfil its wide range of functions, the Authority must satisfy political, economic, social and environmental objectives over the short, medium and longer term. This subjects it to a different set of external and internal constraints and incentives from those found in the private sector, all of which affect its governance arrangements.

A key piece of legislation in Wales is the Well-being of Future Generations (Wales) Act 2015, which requires the Authority to consider the longer term in making its decisions and to work collaboratively with other public bodies to improve well-being in Wales.

Stakeholders are, therefore, interested in issues such as:

- whether the Authority's planned outputs have been delivered and outcomes achieved, and
- whether this has been done in an efficient, economic, effective and equitable manner.

To deliver good governance in the public sector, both governing bodies and individuals working for public sector organisations must try to achieve their objectives while acting in the public interest at all times, which implies primary consideration of the benefits for society, which should result in positive outcomes for service users and other stakeholders.

This Statement gives assurances that North Wales Fire and Rescue Authority has complied with the governance framework for the year ended 31st March 2025.

The Governance Framework

North Wales Fire Authority comprises 28 elected councillors from the six unitary authorities of North Wales, with the number of representatives determined by the population of the area. More information about the Authority, its members and responsibilities can be found [here](#).

The Authority is required to review the effectiveness of its arrangements each year to ensure that there is a sound system of governance. The key contributors to this process include:

Having an Authority and committee structure that:

- monitors the effectiveness of risk management arrangements
- regularly reviews the governance arrangements
- considers and reviews internal and external audit strategies, plans and reports
- reviews, scrutinises and approves the annual statement of accounts.

Having an Executive Panel that:

- provides leadership on governance
- contributes to the completion and review of the Annual Governance Statement
- provides clear direction to the Service and senior managers.

The use of information from various sources to inform the governance arrangements, for example:

- improvement and performance board reports
- risk management arrangements
- external regulator reports
- internal audit reports

The Authority's normal schedule of meetings are attended remotely. The full Fire and Rescue Authority meetings are webcast in Welsh and English simultaneously. All meetings are made available to the public to observe, should they make a request to do so.

Early in 2023, the Authority established two working-groups to support the development of two key organisational priorities:

- The Emergency Cover Review Working Group, which has now been superseded by a Collective Agreement Task and Finish Group with Trade Union representation but no longer any Fire Authority representation.
- The new Training and Development Centre Working Group.

In addition, a member of the Fire and Rescue Authority sits on the Equality, Diversity and Inclusion Committee as a member champion, and following the report of the CREST cultural review report the Chief Fire Officer now chairs a Cultural Board to manage the implementation of the Strategic Cultural Improvement Plan, which is due to be published on the Fire Authority website imminently.

In April 2025 the Authority approved the second of its Community Risk Management Implementation Plans ([CRMIP 2025/26](#)) to deliver against the objectives outlined in the five-year [Community Risk Management Plan \(CRMP\) 2024-2029](#)

A Community Risk Management Plan (CRMP) aims to identify risks facing the community and describes how the Fire and Rescue Authority will manage those risks and continue to prevent and respond to fires and other emergencies.

The Authority has developed five principles for keeping communities safe and the CRMP;

- Acknowledges the requirements of key legislation
- Considers the ongoing work of the Public Services Boards
- Identifies the risks facing our communities
- Outlines what activity the Authority had taken to address these risks
- Explains what actions the Authority will take over the next five years to mitigate those risks
- Aligns with the Authority's revenue budget, capital plan and medium-term financial plan.

Fig 2. Committees of the Fire and Rescue Authority

The Authority has delegated responsibility for the day to day operation of the Fire and Rescue Service (the Service) to the Chief Fire Officer.

The Chief Fire Officer is supported by The Executive Group comprising the Principal Officers, (Chief, Deputy and Assistant Fire Officers) which is responsible for strategic leadership.

The Service Leadership Team (SLT), includes the Principal Officers, Area Managers and Heads of Department. It meets as a Performance Board to scrutinise performance, and as an Improvement Board to provide challenge and senior oversight of programmes, projects and policies. The SLT provides organisational leadership and service delivery.

The Service Governance and Assurance Structure of committees and groups, reporting to SLT, are embedded across the organisation, demonstrating robust governance across reporting, monitoring, scrutiny and decision-making within all areas of the organisation.

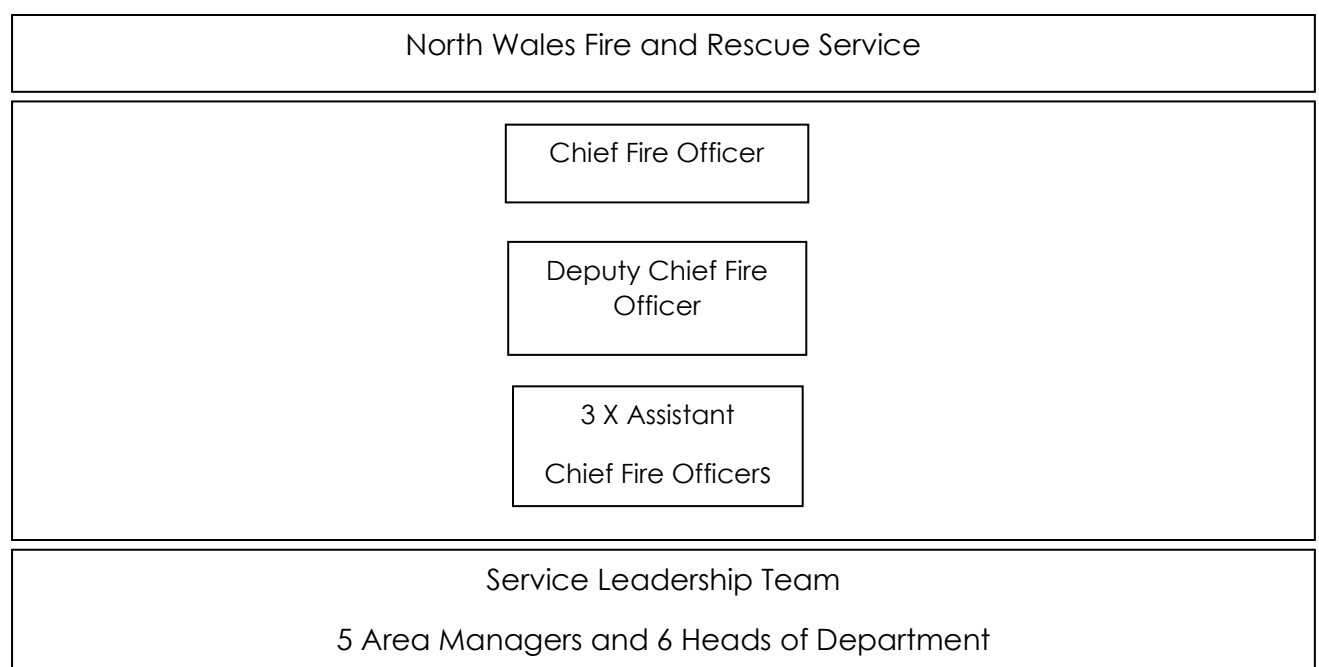


Fig 3. Service Leadership Structure

Key Contributors to Developing and Maintaining the Governance Framework

Constitution	The purpose of the Constitution is to set out in clear language how the Fire Authority works and how it makes decisions
Fire Authority	Provides the strategic leadership, political interface and corporate challenge in relation to the provision of fire and rescue services across North Wales, encouraging public participation and conducting its affairs in an open and transparent manner. It agrees the Improvement and Wellbeing Plan, and the revenue and capital budgets
Executive Panel	Monitors the performance of the Service and makes recommendations to the Authority on its key policies including the Improvement and Wellbeing Plan. The Panel reviews the strategic risk register.
Audit Committee	Provides independent review of the governance, risk management and control frameworks and oversees the financial reporting, including the Treasury Management Strategy and annual accounts.
Standards Committee	Promotes and maintains high standards of conduct by Members of the Authority and oversees the whistle-blowing policy for complaints against Members of the Authority. Also, where statute permits, to receive reports and complaints about Members and to conduct or oversee investigations and make recommendations to the Authority.
Fire Authority Working Groups	Undertake detailed work associated with the Authority's planning and budget-setting process. It submits its observations to the Executive Panel which in turn makes recommendations for improvement/risk reduction/well-being objectives to the Authority.
Executive Group	Implements the policy and budgetary framework set by the Fire Authority and provides advice to the Fire Authority on the development of future policy and budgetary issues.
Service Leadership Team	Sets and leads the implementation of the governance standards across the Service. Receives the annual improvement plan and feeds into the annual self-assessment.
Section 151 Officer	Ensures lawful and financially prudent decision making. Administration of financial affairs. Accountable for developing and maintaining the Fire Authority's governance, risk and control framework. Contributes to the effective corporate management and governance of the Fire Authority
Monitoring Officer	Reports on contraventions of any enactment or rule of law. Reports on any maladministration or injustice where the Local Government Ombudsman has carried out an investigation. Maintains and updates the Constitution. Maintains registers of member interests and gifts and hospitality. Advises Members on the interpretation of the Code of Conduct.
Internal Audit	Provides independent assurance and annual opinion on the adequacy and effectiveness of the Fire Authority's governance, risk management and control framework. Delivers an annual programme of risk-based audit activity, including counter fraud and investigation activity. Makes recommendations for improvements in the management of risk.

CIPFA Principles - Governance Assurance

Principle A: Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law.

The Authority's [Missions and Values](#) are published in the Community Risk Management Plan and on the [Authority's website](#).

The [Constitution](#) sets out the responsibilities of the Fire and Rescue Authority and its committees and includes the Scheme of Delegation to Officers.

The Monitoring Officer ensures that decisions taken are within the law and comply with the provisions of the Constitution.

The Constitution includes the [Code of Conduct for Members](#) and this is monitored by the Standards Committee.

Where necessary legal advice is sought to inform decision making.

Codes of Conduct for Members and Officers are in place, which requires the declaration of business interests and recording of the receipt of gifts and/or hospitality. These are published on the Authority's website as part of each [Member's personal profile](#).

Key policies are in place to prevent and minimise the risk of fraud. Policies include: Whistleblowing Policy, [Anti-Fraud, Bribery and Corruption Policy](#) and [Financial Regulations](#) and [Contract Procedure Rules](#). Where irregularity is suspected arrangements are in place to ensure that it is thoroughly investigated.

The recruitment policy, induction and training processes incorporate personal behaviours with core values.

Reaccreditation of our Public Health Wales Corporate Health Gold and Platinum awards, an award scheme run by Healthy Working Wales, on behalf of Public Health Wales. These awards allow employers to demonstrate policies and actions designed to promote happier and healthier workforces.

An Equality, Diversity and Inclusion (EDI) Steering Committee was established in 2022 and a five-year [Equality, Diversity and Inclusion Strategy 2024-2029](#) has been developed and published.

The implementation of the EDI strategy will be guided by a detailed annual EDI action plan, which will be performance-managed by the Equality, Diversity and Inclusion Committee which meet on a quarterly basis.

The Service is committed to upholding standards and takes all concerns seriously. Disciplinary cases and any allegations of wrongdoing are investigated in accordance with the Service's Discipline Handbook. The Service has now recruited two Discipline and Grievance Officers, ensuring allegations are promptly and professionally investigated.

[Welsh Language Standards Monitoring report 23-24](#) is published on the Authority's website detailing the Authority's compliance with the Standards.

As part of our commitment to the Welsh language, all new members of staff are required to achieve a minimum of Level 2 Welsh language skills and Level 3 upon promotion.

The Community Risk Management Plan which contains Improvement and Well-being objectives is currently subject to public and stakeholder consultation. The ratified Five-year Plan and the 2024-25 Implementation Plan will be published on the Authority's website. This meets our obligations as required by the Local Government (Wales) Measure 2009, and the Well-being of Future Generations (Wales) Act 2015.

A Safeguarding policy and procedure is in place to refer vulnerable people the Service come into contact with, to other agencies.

All departmental plans and policies, where applicable, demonstrate alignment to the Well-being of Future Generations (Wales) Act 2015

Safecall, a professional, confidential and independent service provides a means for concerns to be reported by any member of staff 24/7, 365 days of the year, and is widely publicised across the Service. The Service recognises the importance of offering anonymous reporting and engagement in sensitive situations.

The Service has adopted The Social Partnership Duty and has built on well-established arrangements between the Service and staff representative bodies to consult on objectives and strategic decisions about how it intends to deliver those objectives. The first [Social Partnership Duty Annual Report](#) was approved for publication and submission to the Social Partnership Council in April 2025.

Principle B: Ensuring openness and comprehensive stakeholder engagement.

All meetings are advertised and full Authority meetings are webcast. Agendas and papers are available on the Authority's website.

Information is published on the Authority's website as part of the publication scheme. Read/Speak and Welsh versions of documents are provided.

Public consultation arrangements are in place to invite the views of stakeholders prior to developing and implementing key changes. This includes consultation on the Improvement Objectives contained in the Community Risk Management Implementation Plan 2024-25.

The [Authority has previously been recognised as achieving 'Good Practice' by the Consultation Institute](#) for all elements of the public consultation in connection with the ongoing Emergency Cover Review.

The commitment to openness is also shown through;

- completion of impact assessments for all key decisions;
- the Complaints and Compliments Procedure, which includes the ability to escalate significant matters;
- the Public Engagement and Consultation Strategy;
- engagement with Employee Representative Bodies, informally and formally through the Joint Consultation and Negotiation Committee, which will be further strengthened by the adoption of the Social Partnership Duty in the new financial year;
- a biennial commitment to engage with staff via the 'Fire Family' staff survey.
- membership of the Welsh Local Government Association, North Wales Equality Leads Forum, The Race Council Cymru and the North Wales Inter-Faith Forum.

A variety of engagement methods are used including:

- directed communication using social media, with accounts on Facebook and X. This includes both corporate accounts as well as social media accounts run by fire station staff to widen engagement in local communities;
- the ability to sign up for email updates on specific issues via the website;
- engagement with young people via the Phoenix programme, Fire cadets and school visits;
- community safety engagement with householders and businesses;
- a Positive Action group, chaired by the ED&I officer, to plan and direct events for all firefighter recruitment;

- attendance at open days/events – for example organised events like the Eisteddfod as well as fire station events organised by staff;
- internal communications include the Weekly Brief electronic newsletter to staff;
- external communications campaigns, led by the Community Safety Managers.
- through Prevent and Recruitment activities the service engages with people of all ages and diverse backgrounds.

Partnership arrangements are in place for:

- All Wales Joint Emergency Service Group currently chaired by the CFO;
- Local Resilience Forums;
- the three local Public Services Boards;
- the Regional Partnership Board;
- the Strategic Arson Reduction Board;
- the Local Safeguarding Adults Boards and Local Safeguarding Children's Board;
- collaboration with other Emergency Services.

Principle C: Defining outcomes in terms of sustainable economic, social and environmental benefits.

The five-year Community Risk Management Plan sets the strategic direction for the Authority and details the improvement objectives in accordance with the Local Government (Wales) Measure 2009, and well-being objectives in accordance with the Well-being of Future Generations (Wales) Act 2015.

The Authority's policies reflect the sustainable development principle of the Well-being of Future Generations Act (Wales) 2015.

The Medium-Term Resource Strategy, which includes a 10-year Capital Plan, and annual budget process aims to ensure that financial resources are directed to the Authority's priorities.

The Service continues to ensure the mandatory e-learning is undertaken by all staff in respect of the Violence Against Women, Domestic Abuse and Sexual Violence Act.

As a [Disability Confident](#) employer, the Service is committed to recruiting and retaining disabled people and those with health conditions.

The Service has also signed the [Armed Forces Covenant](#), which is a promise by the nation to ensure that those who serve or who have served in the armed forces, and their families, are treated fairly. This is supported by an Armed Forces Reserves and Veterans Policy.

The Service pays [above the real living wage](#).

A Safeguarding policy and procedure are in place to refer vulnerable people the Service come into contact with, to other agencies.

The appropriate criminal records checks are crucial to the Service to understand and mitigate risk, to protect colleagues and the public. Fire and Rescue Authorities are now listed in Schedule 1 Rehabilitation of Offenders 1974 (Exceptions) and as such, all employees are now eligible for a Standard level DBS check as a minimum level and these are now renewed on a three-yearly cycle.

The Service has a statutory duty to put in place business continuity arrangements. Plans across the Service are reviewed annually and there is ongoing collaboration with the other fire and rescue services in Wales to improve planning and consider current risks.

Key decisions are subject to an integrated impact assessment, which takes account of equality; data protection; health, safety and wellbeing; Welsh language; finance; sustainability and staffing; Well-being of Future Generations (Wales) Act 2015 and the socio-economic duty and it will also take account of the anticipated statutory Health Duty.

The Authority has developed and adopted an Environmental Strategy which sets out detailed and robust performance targets for a reduction of our carbon emissions and other significant environmental impacts.

Principle D: Determining the interventions necessary to optimise the achievement of the intended outcomes.

Public consultation is carried out as part of setting the Authority's objectives which are set out in the Community Risk Management Implementation Plan.

An assessment of the Authority's performance against its annual objectives is published in October each year.

The Authority's Strategic Risk Management Policy (which is currently being reviewed following internal audit) sets out the process used to identify and control exposure to uncertainty, which may impact on the achievement of the objectives or activities. This is reviewed throughout the year to ensure that risks are appropriately managed.

Following scrutiny from the Executive Group, performance and financial reports are presented to the Authority and its committees.

A quarterly Performance Monitoring Report is prepared for the Executive Panel and the Service Leadership Team scrutinise data relating to incident demand, emerging trends, and availability at the Performance Board, ensuring that issues are identified and appropriate interventions agreed.

The budget planning processes, involving Service leads and Authority Members, ensure budgets are allocated to support risk-based objectives whilst balancing the costs associated with maintaining estates, vehicles and equipment. The Budget, Monitoring and Procurement Committee provides the necessary strategic oversight and governance.

The Organisational Learning Committee provides strategic oversight and governance of National Operational Guidance and Joint Operational Learning available and implements any necessary changes.

Health and Safety incidents are reported, reviewed and monitored to ensure the safety of all staff is optimised and risks are minimised. The Health Safety & Wellbeing Committee has strategic oversight and governance.

The [All Wales Dwelling Fire Response Charter](#) sets out seven high-level commitments in respect of preventing and responding to dwelling fires. It is reported upon annually as part of the Authority's Annual Performance Assessment.

Principle E: Developing the entity's capacity, including the capability of its leadership and the individuals within it.

The Authority's Constitution outlines the roles of elected members and designated officers to enable shared understanding of roles and objectives.

The designated posts include the Chief Fire Officer, Treasurer and Monitoring Officer.

Regional and national collaborative working exists, for example, the three Welsh fire and rescue services participate in the All Wales Fire Investigation Training Forum, supporting shared learning and promoting a consistent approach across Wales.

The Authority has adopted the All-Wales People and Organisational Development Strategy 2025-2028, which underpins the commitment to lifelong learning and workplace competence.

Induction processes for Members and employees include an introduction to the organisation's core values, the standards of conduct and the role requirements.

The development needs of employees are identified through one to one meetings.

Health and wellbeing support is provided to maintain physical and mental wellbeing. This is achieved through a range of measures including HR policies and guidance documents, flexible working approach, the occupational health service and the employee assistance programme. The Health, Safety & Wellbeing Committee provides strategic oversight and governance.

The Service has a dedicated training department, with competency frameworks for operational staff. Training is delivered using a variety of methods including e-learning modules which are mandatory for certain subjects e.g. Data Protection. The Organisational Learning Committee provides strategic oversight and governance.

Staff are members of relevant professional bodies and undertake the required continual professional development.

The Service aligns its promotional processes to the National Fire Chiefs Council (NFCC) leadership framework.

Principle F: Managing risks and performance through robust internal control and strong public financial management.

The Treasurer is responsible for the proper administration of the Authority's financial affairs as required by [Section 151 Local Government Finance Act 1972](#).

The Monitoring Officer ensures compliance with established policies, procedures, laws and regulations.

The Strategic Risk Management Policy (which is currently being reviewed following internal audit) details the process for the identification and control of risks. A corporate risk register is maintained by the Corporate Planning Department and is monitored throughout the year.

Reports to the Authority and its committees include an integrated impact assessment to inform and support decisions.

Business continuity arrangements are in place to ensure that critical services can continue to be delivered at all times and reviewed annually.

The Authority's Audit Committee ensure that recommendations for improvement made by the External Auditor, Audit Wales, and the Internal Auditor are agreed and monitored.

Members and senior management are provided with [quarterly reports](#) on Service improvement and performance against key performance indicators and milestones.

The Authority has arrangements to maintain [registers of Members' personal and business interests and a register of gifts and hospitality](#). These are published on the Authority's website as part of each Member's personal profile.

Policies for Anti-Fraud and Corruption and Whistle-blowing are in place which confirms the Authority's commitment to operating in a fair and transparent manner.

Policies and arrangements are in place to manage the handling of data. These are the Data Protection Policy, Freedom of Information Policy, Data Retention Policy and Communications and Information Security Policy. These policies are supplemented with training and the e-learning module on data protection is mandatory for all staff.

Information sharing protocols have been developed and agreed with partners.

Financial management supports the delivery of services and transformational change as well as securing good stewardship. [A financial update](#) is presented at each Authority meeting, with [reports](#) available to the public on the website.

The Treasury Management arrangements follow professional practices and are reviewed annually by members.

The [Authority's Statements of Accounts](#) and its performance against key areas of risk and priority are subject to scrutiny by external audit.

Principle G: Implementing good practices in transparency, reporting and audit to deliver effective accountability.

North Wales and Mid and West Wales Fire and Rescue Services jointly appointed Crest Advisory to facilitate an independent cultural review. The review followed the Welsh Government's acceptance in March 2024 of a proposal from both Fire and Rescue Services to better understand the progress of improvements to organisational culture in each Service.

The proposal formed the basis of a written statement by the, then, Deputy Minister for Social Partnership, Hannah Blythyn, whose statement can be read in full [here](#).

Crest Advisory, conducted the review and published a [report](#) into their findings in January 2025, which contained 32 recommendations.

The Authority Chair and Chief Fire Officer have promised to;

- Turn the report recommendations into actions that will guide improvements to workplace culture.
- Engage staff and stakeholders at all levels to foster awareness and participation, to make sure change is meaningful and reflects the needs of everyone.
- Maintain transparency and accountability through regular updates and feedback opportunities with staff and wider stakeholders.

The Authority, with assistance from the Monitoring Officer, oversees and reviews the adequacy and effectiveness of the governance arrangements and internal control environment.

Agendas and minutes of [Fire and Rescue Authority meetings](#) are publicly available on the internet along with webcasts of the Authority meetings.

Authority reports follow a structured format which ensures that key information is presented in a clear and consistent manner to aid decision making.

The Authority complies with the requirements of the Freedom of Information Act 2000, in respect of its obligation to publish certain information as part of its [publication scheme](#) and responding to requests for information from members of the public.

The Community Risk Management Plan documents the improvement and well-being objectives of the Authority and is reviewed by Audit Wales in connection with the issue of a Certificate of Compliance.

The Annual Statement of Accounts are produced in a user-friendly format. This provides clear information on income and expenditure and demonstrates the stewardship of public money for the year. The accounts are submitted for audit by the statutory deadline.

The [Annual Pay Policy Statement](#) is approved and published in accordance with the Localism Act 2011. Members' salaries are paid in accordance with the Independent Remuneration Panel decisions and reported on the internet.

Members and senior officers declare relevant interests in accordance with the Code of Practice on Local Authority Accounting in the UK. These declarations enable the Authority to identify and report any related party transactions.

A report is prepared for Welsh Government each January and July detailing matters of discipline, grievance and external complaints. In particular, it highlights cases of alleged misconduct/gross misconduct where the alleged behaviour of individuals calls into question the culture and values of North Wales Fire and Rescue Service.

The Annual Governance Statement provides transparency on the governance arrangements and the planned governance improvement actions for the coming year.

The Auditor General is the external auditor appointed by statute and provides an opinion on the Statement of Accounts, which is published on the Authority's website. The Authority acts on recommendations and, where necessary, takes corrective action.

The Internal Audit arrangements include a risk-based approach, which provides assurance that key risks are being managed. The Authority acts on recommendations and where necessary, takes corrective action.

Following a review of internal arrangements, the Service appointed a new Internal Auditor in June 2023 to strengthen assurance arrangements.

Processes are in place to ensure that recommendations from inspection and regulatory bodies are actioned.

How the Authority addressed its 2024/25 Governance Improvement Actions.

Governance Improvement Area	Planned Action	Forum	Responsibility	Progress as at March 2025
Governance Framework Review	Action through the Service Leadership Team to design an annual process that explicitly involves the SLT and Internal Audit in assessing the extent to which the principles contained in the Good Governance Framework are being applied.	SLT Performance Board	Head of Corporate Planning, Performance and Transformation	This action has been completed. SLT leads were identified for each of the seven CIPFA Principles and they have reviewed existing arrangements against each of the sub principles.
Governance Arrangements	Consider the findings and recommendations arising from Audit Wales review of Governance Arrangements.	Fire and Rescue Authority	Head of Corporate Planning, Performance and Transformation	This action has been completed. The Report was presented to the full Fire and Rescue Authority (FRA) on the 21 st October 2024, where the report and its recommendations were noted. As a direct response to one of the recommendations, relating to training, Level 4 strategic risk training was delivered to members of the FRA Executive Panel on the 17 th March 2025 and the training resources made available to all members of the FRA.
Efficacy of Prevention activities	Consider the findings and recommendations arising from Audit Wales review of Prevention.	Fire and Rescue Authority	Head of Prevention and Protection	This action is not complete. The Audit did not take place as originally scheduled but has now been completed and the report is awaited from Audit Wales. This action will be carried forward for action on any recommendations during 2025/26.

Strategic Risk Management	Implement the recommendations from the Internal Audit review of Core Controls of Risk Management.	SLT Improvement Board	Head of Corporate Planning, Performance and Transformation	This action is complete. However, a Risk Management Review Assignment Report 2024/25 by internal auditors in March 2025 provided limited assurance and five recommendations have been agreed and will be progressed to conclusion in 2025/26.
Well-being of Future Generations (Wales) Act 2015	The statutory obligation to ensure that the well-being objectives in the Community Risk Management Plan are kept under review to ensure the objectives are met.	SLT Performance Board	Head of Corporate Planning, Performance and Transformation	The 2023/24 Annual Performance Assessment reported on the 2023/24 well-being and improvement objectives as well as reflecting upon the achievements against the FRA's three-year Corporate Plan. Progress against the well-being objectives, contained within the first Community Risk Management Improvement Plan 2024-25, were reported to SLT Performance Board, which is now embedded as a quarterly report.
The Social Partnership and Public Procurement (Wales) Act 2023	Embed the principles and requirements of The Social Partnership and Public Procurement (Wales) Act 2023.	Joint Consultation and Negotiation Committee	Head of Corporate Planning, Performance and Transformation	This action is complete. The Head of Corporate Planning, Performance and Transformation attends the Joint Consultation and Negotiation Committee with Union representatives to discuss objective setting at the formative stage and updates are provided and feedback invited from Union representatives, culminating in the agreement of the annual Social Partnership Duty Report which was ratified by the FRA on 28 th April 2025.

The Authority's Governance Improvement Actions 2025/26

Governance Improvement Area	Planned Action	Forum	Responsibility	For completion by
Efficacy of Prevention activities	Consider the findings and recommendations arising from Audit Wales review of Prevention.	Fire and Rescue Authority	Head of Prevention and Protection	March 2026
Setting of Well-being Objectives	Consider the findings and recommendations arising from Audit Wales review of well-being objective setting.			December 2025
Strategic Risk Management	Implement the recommendations from the Internal Audit review of Core Controls of Risk Management.	SLT Improvement Board	Head of Corporate Planning, Performance and Transformation	March 2026
Organisational Culture	Respond to the recommendations of the CREST independent cultural review through staff and Fire and Rescue Authority engagement, culminating in the publication of an improvement plan.	Fire and Rescue Authority	Chief Fire Officer	July 2026
Efficacy of Response to Domestic Dwelling Fires	Respond to recommendations in the Chief Fire Advisor and Inspector for Wales' "Inspection of the North Wales Fire and Rescue Service to consider the effectiveness of its response to domestic dwelling fires".	Fire and Rescue Authority	Head of Response	March 2026
Supplier verification and Anti-fraud guidance	Respond to recommendations by the Internal Auditor in relation to Key financial processing controls 2024/25 including implementing Supplier Verification, Anti-Fraud Guidance and Regular Reviews of Bank Mandates.	Finance and Procurement Committee	Head of Finance	March 2026

Compliance with the Financial Management Code

The CIPFA Financial Management Code (CIPFA FM Code) is designed to support good practice in financial management and to assist the Authority in demonstrating their financial sustainability. The CIPFA FM Code therefore sets the standards of financial management for the Authority.

The Code is based on a series of principles supported by specific standards and statements of practice which are considered necessary to provide the strong foundation to:

- Financially manage the short, medium- and long-term finances of the Authority
- Manage financial resilience to meet foreseen demands on services
- Financially manage unexpected shocks in their financial circumstances.

Each Authority must demonstrate that the requirements of the Code are being satisfied.

As Section 151 Officer I have the Statutory Responsibility (supported by the Service Leadership Team and Members of the Authority) for ensuring compliance with the CIPFA FM Code.

I have carried out a full assessment of compliance with the CIPFA FM Code as part of the annual review of the Annual Governance Statement and I can confirm that in my opinion the Authority is compliant with the code in the majority of areas.

Signed _____

(Treasurer) 2025

Governance Opinion and Conclusion

The Authority recognises that good governance provides the foundation for the delivery of good quality services that meet the needs of stakeholders and ensures that public money is well spent. This review confirms the governance systems and monitoring in place for 2023/24 and the steps taken to ensure that they are working effectively.

The Authority is satisfied that appropriate governance arrangements are in place and remains committed to enhancing these through the implementation of the action plan for 2024/25.

Signed _____


(Chair) 2025

Signed _____

(Chief Fire Officer) 2025



Awdurdod Tân ac Achub Gogledd Cymru
North Wales Fire and Rescue Authority

Report to	North Wales Fire and Rescue Authority	
Date	21 July 2025	
Lead Officer	Anthony Jones, Assistant Chief Fire Officer	
Contact Officer	Mike Plant, Head of Planning, Performance and Transformation	
Subject	Performance Monitoring Report, April 2024 – March 2025	

PURPOSE OF REPORT

- 1 To provide comparative data relating to North Wales Fire and Rescue Authority (the Authority)'s 'Our 5 Principles for keeping communities safe' for the 2024/25 financial year. The report also contains commentary on activity and proposed activity associated with the principles.
- 2 To highlight emerging trends in both increased, reduced and new demands.
- 3 To inform the development of new or revised activity to mitigate any increasing and emergent demand and risk.

EXECUTIVE SUMMARY

- 4 The number of fire incidents has increased, with 1,801 fires attended – an increase of 8.5% compared with the same period last year.
- 5 The number of False Alarm incidents continues to rise, with 3,263 incidents attended – an increase of 12.4% compared with the same period last year.
- 6 The number of Accidental Dwelling Fires attended remained the same as last year, with 338 incidents attended.

OBSERVATIONS FROM EXECUTIVE PANEL/AUDIT COMMITTEE

- 7 The report was presented to the Executive Panel on 16 June 2025, where members noted the report. Members raised several questions on a variety of the areas of performance including Safe and Well Check completions, on-call availability and youth engagement activities, highlighting the positive impact of the Services prevention activities.

RECOMMENDATION

- 8 It is recommended that Members:
 - i) **Note the content of the Performance Monitoring report.**

INFORMATION

- 9 Unless otherwise stated, all figures are based on the combined four quarters of the 2024/25 financial year, with comparisons made to the same period of the previous financial year (2023/24).

IMPLICATIONS

Well-being Objectives	Helps the Authority to monitor its performance against the improvement and well-being objectives in the Community Risk Management Implementation Plan 2024-25.
Budget	No direct budget implications. However, reporting allows FRA to consider any potential impacts on budget due to unanticipated incident activity.
Legal	Supports the FRA, as required by the Well-being of Future Generations (Wales) Act 2015, to demonstrate how it is taking all reasonable steps, in exercising its functions, to meet its well-being objectives.
Staffing	No staffing implications. However, aligning reporting to the FRA's CRMP will be more efficient.
Equalities/Human Rights/ Welsh Language	No implication identified.
Risks	No risk implications



Gwasanaeth Tân ac Achub
Fire and Rescue Service

North Wales Fire and Rescue Service

Monitoring Report: April 2024 – March 2025



Our five principles for keeping communities safe

PEOPLE

PREVENTION

PROTECTION

RESPONSE

ENVIRONMENT

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Our People Principle



1 Sickness Absence

The Service aims to encourage all its employees to maximise their attendance at work while recognising that employees will, from time to time, be unable to come to work because of ill health.

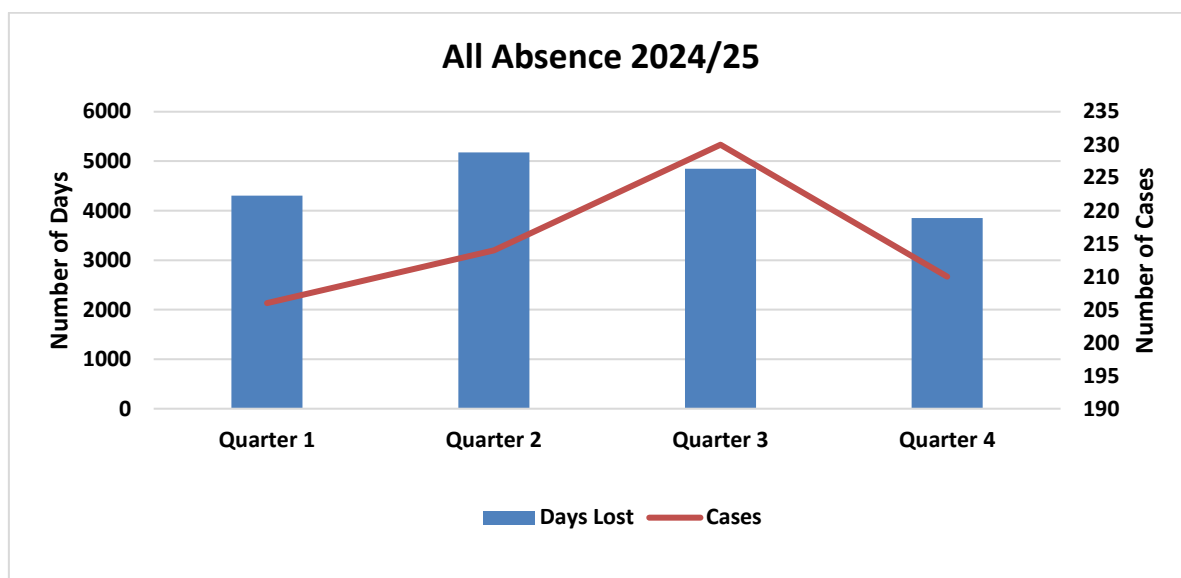
Total time lost, for NWFRS, due to all sickness absence has reduced to 4.51% during quarter four, which is a decrease in the lost time across the three previous quarters in 2024/25 and is also a decrease compared with quarter four during the previous year, which recorded 4.80% time lost due to sickness.

According to the National Fire and Rescue Service Sickness Absence Report from April 2024 – December 2024, the average rate of employee absence is 9.13 working days/shifts per employee. (The report collected data from 36 participating FRSs in England). The average rate of short-term absence within NWFRS is 6.61 days per employee, which is a lower number of days lost compared with the information gathered in the report.

949 individuals were employed by NWFRS as at 31/03/2025, which is an increase of 43 people from the same period in 2023/24; however total time lost due to all sickness absence has reduced from the previous year, demonstrating an overall improvement in sickness absence levels.

Please note that throughout the report, the number of cases in the year to date (YTD) will not be a sum of the quarters as some individuals' absences will span across quarters. There may also be fluctuations in the numbers reported from quarter to quarter as a result of changes to employee data.

1.1 All Sickness Absence



Overall, quarter two saw the highest number of days lost due to all sickness absence whilst quarter three had the highest number of cases of sickness absence. Despite the peaks seen during quarter two and three, the overall number of days and cases of absence has reduced by quarter four.

The number of short-term absence days was high during quarter one but then reduced and remained at a similar rate throughout the rest of the year. Whilst the number of short-term absence cases dipped in quarter two and then rose again in quarter three, this has again reduced in quarter four. The number of days and cases of short-term absence in quarter four is slightly lower when compared with quarter four in the previous year.

Short term means individual periods of sickness of 27 calendar days or less.

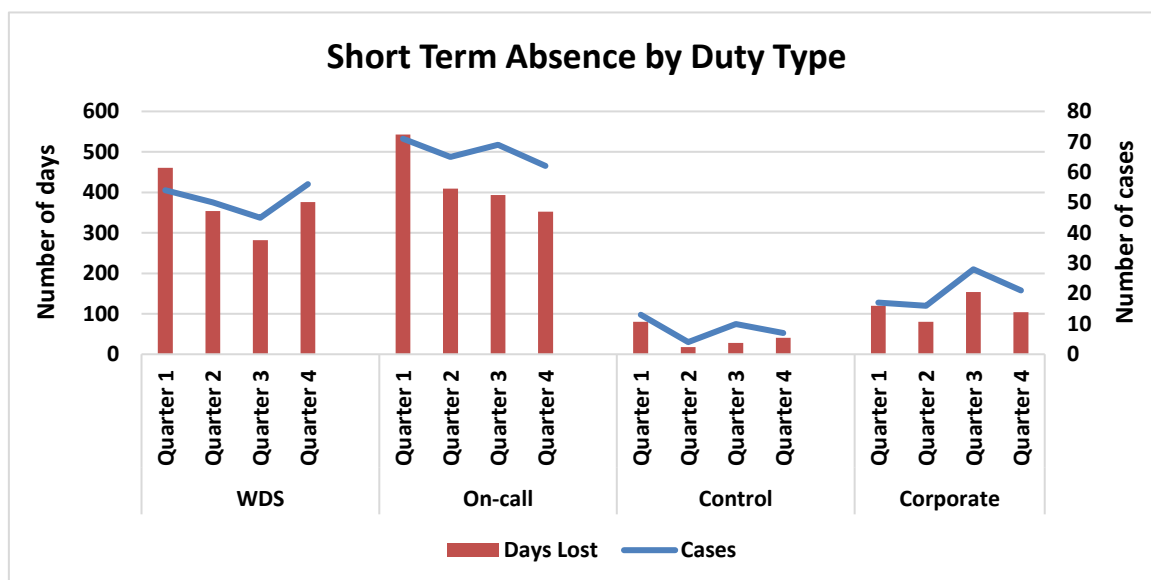
Long term means individual periods of 28 calendar days or more.

Some duty systems may see a higher percentage of lost time despite fewer cases of absence being recorded. This is caused by there being fewer staff within that duty system. The sickness absence percentage calculation is proportionate to the number of staff within that duty system.

1.2 Short Term Sickness

On average over the full year of 2024/25, short term absence has accounted for 1.12% of all time lost.

Short Term Sickness has reduced during quarter 4, equating to 1.02% of time lost in this period, compared with 1.47% of time lost across all duty types during quarter one. This is also a reduction from the previous quarter in 2024/25 and also the same period in the previous year.



(*Wholetime - includes all operational staff, such as station based, rural and flexi duty officers)

(SLT have been split so operational members of SLT are included within wholetime figures, and Heads of Departments are included within Corporate Departments).

Quarter one and quarter two saw increases in short term absence due to a high number of cases of cold/flu and stomach bugs/norovirus.

12% of the short-term sickness cases during quarter one were reported as being due to sickness and diarrhoea, compared with 6% in the same period in the previous year. UK Government reported on 28 April 2024 that 'there was an unseasonal rise in norovirus activity during weeks 16 and 17 of 2024, mostly attributable to increased reporting in adults aged 65 years and over. This coincided with more outbreaks reported in health and social care settings'. Norovirus sickness quickly spread through communities and also impacted NWFRS; employees' absence typically lasted five to seven days due to requiring 48 hours clear of vomiting before return to work to reduce spread of the virus.

Top 3 Short Term Sickness Absence Reasons (Cases)

	Absence Reason	Cases	Lost time %
1	Cold, Flu	44	21.08%
2	Musculoskeletal – Back and Spinal Disorders	13	11.91%
3	Musculoskeletal – Lower Limb	6	11.45%

Lost time % is based upon the days lost rather than the case numbers

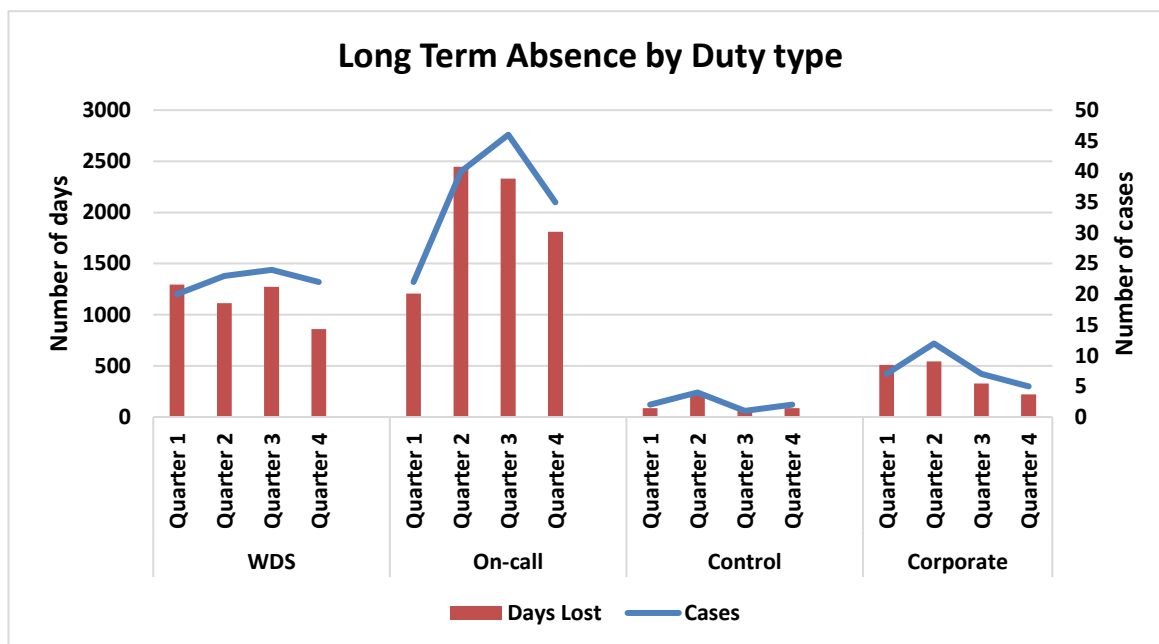
Whilst the reasons above are the top three reasons during quarter four and across all duty types, the reasons for short term absence have remained similar throughout the year.

The highest number of short-term absence cases were due to cold/flu reasons, with musculoskeletal related absences being the second and third highest during quarter four. Cold/flu reasons have been the highest reason for short term absence throughout the 2024/25 year.

1.3 Long Term Sickness

On average over the full year of 2024/25, long term absence has accounted for 4.23% of time lost.

Whilst quarter two and quarter three saw an increase in the number of long-term sickness cases and days, this has reduced across all duty types in quarter four. Long term sickness accounted for 3.49% of time lost across all duty types in quarter four, compared to 5.31% in quarter two, 4.67% in quarter three and 3.61% for quarter four in the previous year.



Top 3 Long Term Sickness Absence Reasons (Cases)

	Absence Reason	Cases	Lost Time %
1	Musculoskeletal – Lower Limb	15	23.96%
2	Mental Health – Stress	7	13.49%
3	Failed Medical / Fitness Test	7	12.52%

Lost time % is based upon the days lost rather than the case numbers

The top three long term sickness absence reasons have remained the same throughout the year. Within the National Fire and Rescue Service Sickness Absence Report from April 2024 – December 2024, musculoskeletal reasons accounted for 30% of all sickness absence reasons, with 22% of all sickness absence being due to mental health.

Overall, within NWFRS, musculoskeletal absence, which includes lower limb, upper limb, back and spinal disorders, neck, ribs, hip, accounted for 33% of all absence. This is slightly higher than the findings in the National Fire Services Absence Report, however it should be noted that the report was only available for the period April to December 2024 at the time of preparing this data, whilst NWFRS data is for a full year.

Musculoskeletal – Lower limb absence continues to account for the highest number of cases and lost time. Absences due to this reason include employees who are awaiting surgical intervention or are recovering from surgery but due to the physical nature of operational roles, employees must have fully recovered before returning to work to avoid further exacerbation or injury.

Mental health absence is recorded separately to identify the different reasons of poor mental wellbeing - stress, anxiety, other (which includes phobia, bereavement, trauma/PTSD, addiction) and depression are the most common mental health reasons recorded within the Service. Overall, during 2024/25, all mental health absences accounted for 19% of all absence cases; this is lower than that reported in the National Fire and Rescue Service Sickness report from April 2024 to December 2025.

Long term absence due to mental health - stress continues to be within the top three absence reasons for long term sick throughout the year. However there has been a reduction in the number of absence cases due to stress with lost time reducing to 13.49% in quarter four compared to 17.4% during quarter three of 2024/25.

Whilst the Service has seen an increase in mental health cases, this is also reflective across the country, as reported by NHS monthly statistics bulletin. Adults accessing mental health support has increased from 1.1 million in July 2023 to 1.4 million in July 2024.

Support is provided to employees who are absent due to mental health and musculoskeletal reasons, including access to occupational health, employee assistance programme and physiotherapy treatment. Signposting to external agencies, such as the Firefighters Charity, Parabl and other specific services is also provided to employees.

All Wales Comparison

The average shift days lost per person for all absence (short and long term) on an All-Wales basis was 11.62 shift days per person for wholetime uniformed staff, 17.72 shift days per person for Control staff, and 14.76 shift days per person for non-operational staff.

In comparison with the other Welsh Fire and Rescue Services, North Wales had the lowest shift days lost per person due to both long- and short-term absences across the three duty types reported out of all three services.

Number of shifts/days lost due to sickness	SWFRS	MAWWFRS	NWFRS
Wholetime uniformed staff	13.54	9.54	9.02
Fire control staff	23.70	16.66	12.19
Non-operational staff	21.24	10.40	10.09

Note, the All Wales data is for the period April 2023 to March 2024 with the most recent update published in October 2024 and only reports on absence data for wholetime, control and corporate staff and doesn't include on-call or retained data.

Our Prevention Principle



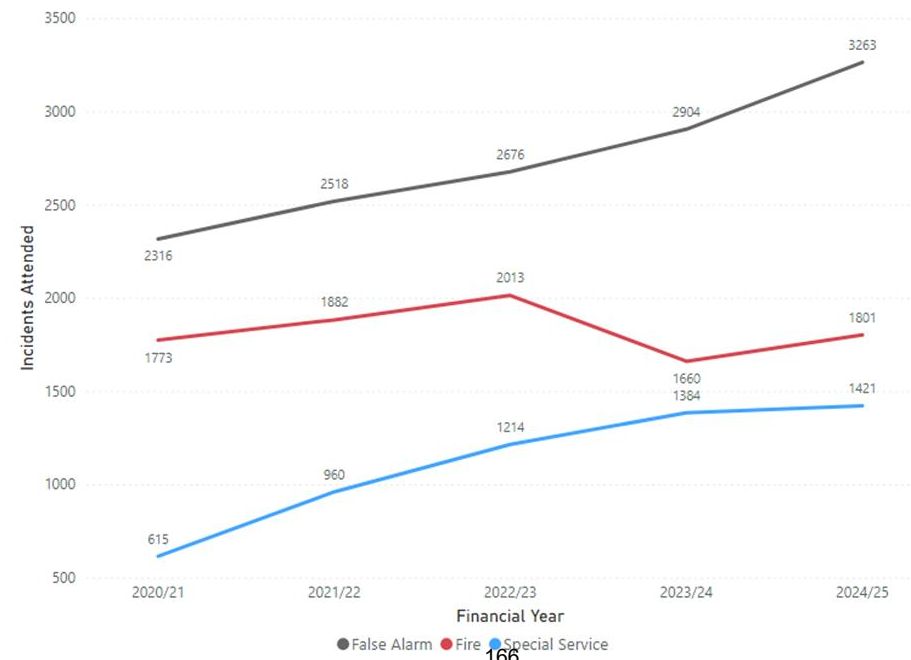
2 All Incidents

All Incidents – **6,485** incidents were attended during the financial year, which is an increase of 9.0% from 5,948. This is also significantly above the 3-year average of 5,737. Provisional statistics indicate that NWFRS was the only Service in Wales to see a rise in attended incidents during the financial year, with MAWWFRS showing a 4.8% decrease (from 13,104 to 12,480), and SWFRS showing a 0.7% decrease (from 19,004 to 18,867).

Fires – **1,801**, an increase of 8.5%. This is still below the three-year average of 1,852.

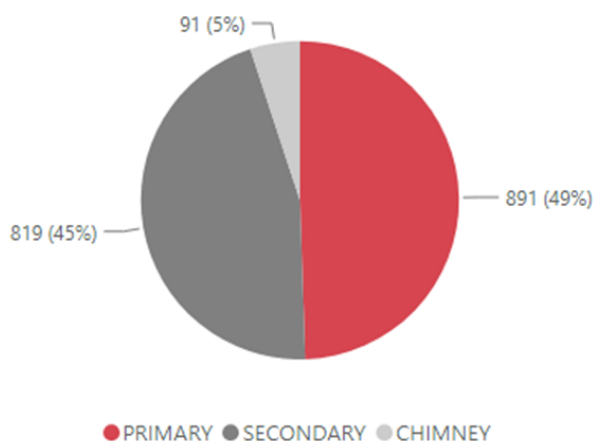
False Alarms – **3,263**, an increase of 12.4%. This is also above the three-year average of 2,699.

SSCs – **1,421**, an increase of 2.7%. This is also above the three-year average of 1,186.



3 Fires, by Category and Motive

1,801 fires were attended: an 8.5% increase from 1,660.



Primary Fires - 891

- **Accidental: 736**, 82.6%.
- **Deliberate: 155**, 17.4%.

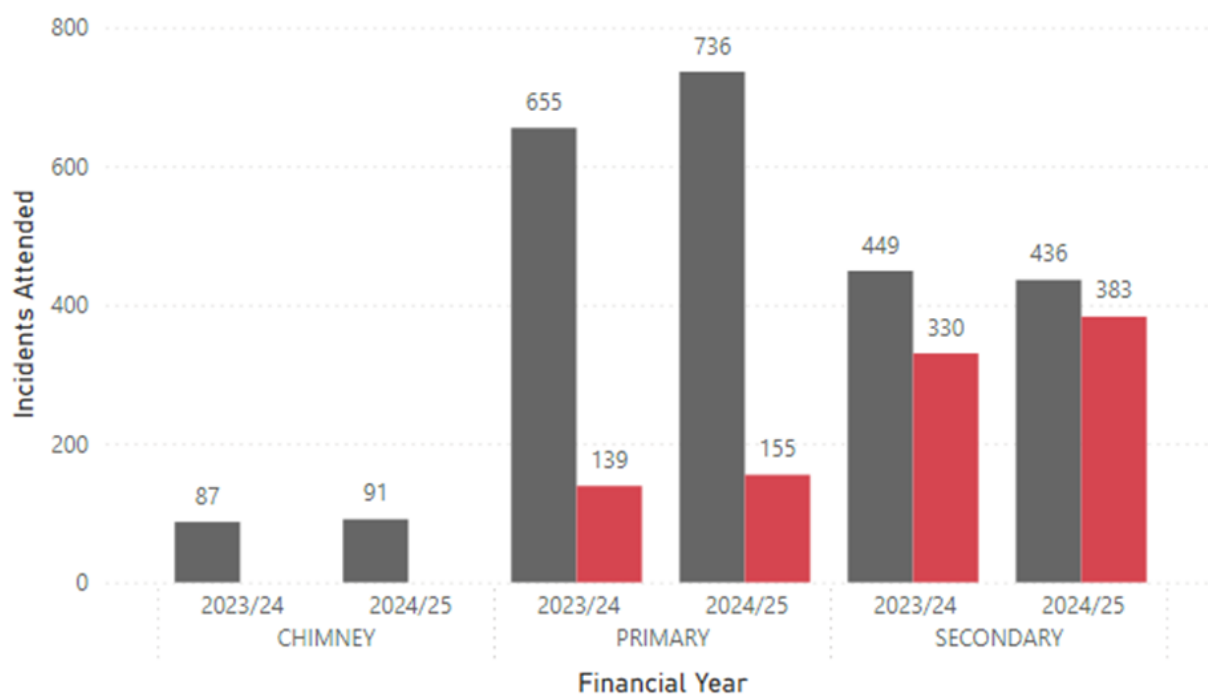
Secondary Fires - 819

- **Accidental: 436**, 53.2%.
- **Deliberate: 383**, 46.8%.

Chimney Fires

- **91**, 5.1% of all fires attended – this is an increase of 4.6% from 87.
-

Motive ● Accidental ● Deliberate



Actions taken to date:

The total number of completed Safe and Well Checks (SAWCs) at the end of quarter four was **20,021**. We have met the target for the year.

This was achieved by continuing to work with our referring agencies to ensure the highest quality of referrals were received, and to make sure those who are more at risk from fire are referred to NWFRS.

Bespoke fire safety sessions were delivered to Occupational Therapists, Carers Outreach, the Homeless Support group, and to Students at Bangor University.

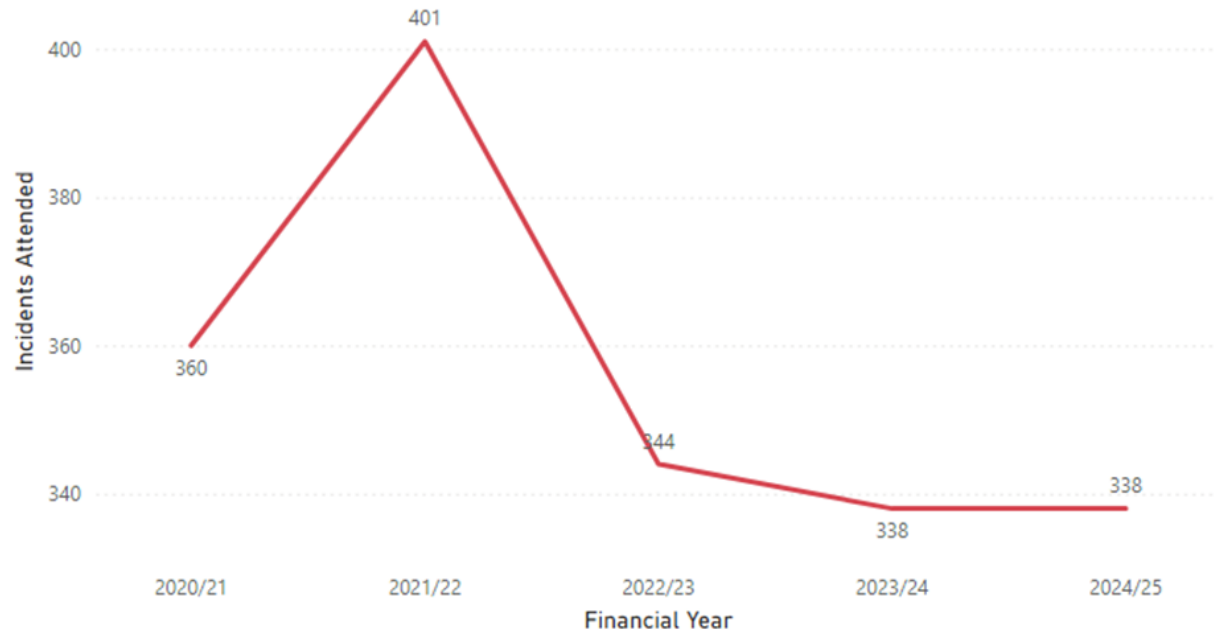
In the last financial year, **133** schools were visited with **11,563** interactions with children and young people who received fire safety advice. **22** Phoenix courses were run with **203** young people.

Targeted social media campaigns included, "Be Wildfire Wise", No Smoking Day, Pancake Day and International Wheelchair Day. Work around targeting and reducing Wildfires took place as a result in a rise in the number of wildfires – this included TV and radio interviews.

The Prevention Department has supported the communities in North Wales by delivering drinking water to identified vulnerable occupiers following the loss of water supply in Conwy. The Prevention staff provided fire safety advice and information during this engagement.

4 Accidental Fires in Dwellings (ADFs)

338 accidental dwelling fires were attended. This is the same number as the previous financial year and is less than the three-year average of 361.



5 Main cause of accidental dwelling fires

There were numerous main causes of ADFs during the financial year. Those which have shown a rise this quarter could be associated with the cost of living crisis, and the costs now involved with heating homes.

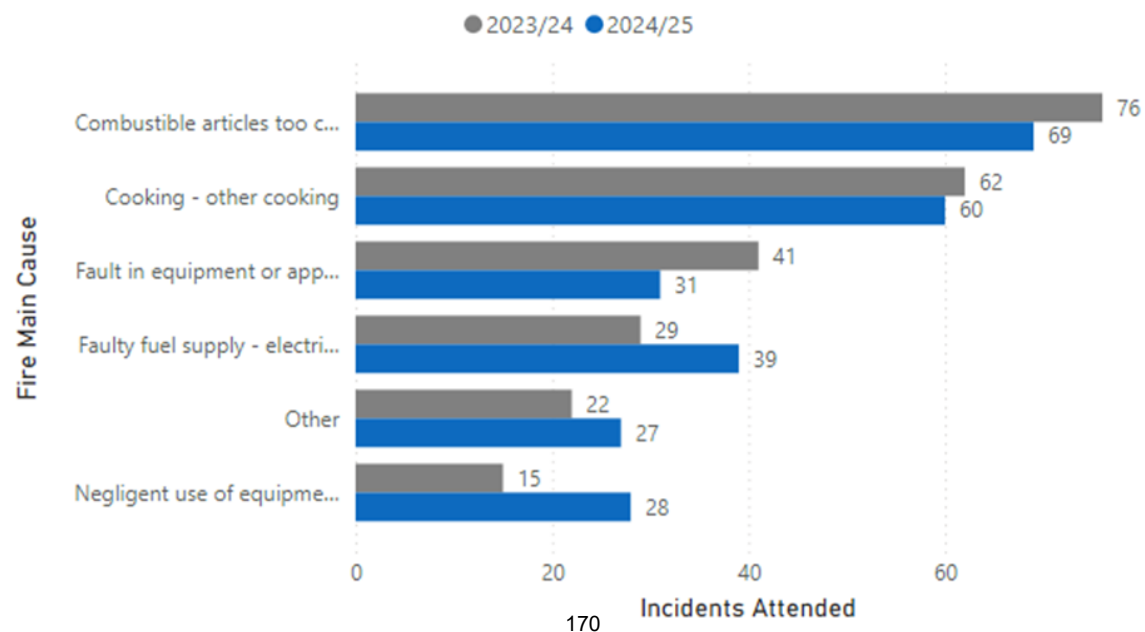
Although the most common was 'Combustible articles too close to heat source (or fire)', this still showed a 9.2% decrease from 76 to **69**.

Other main causes which saw a reduction included:

- 'Cooking – other cooking' which showed a reduction of 3.2% from 62 to **60**.
- 'Fault in equipment or appliance' which showed a reduction of 24.4% from 41 to **31**.

Despite this, a few main causes saw a rise during this quarter. These included:

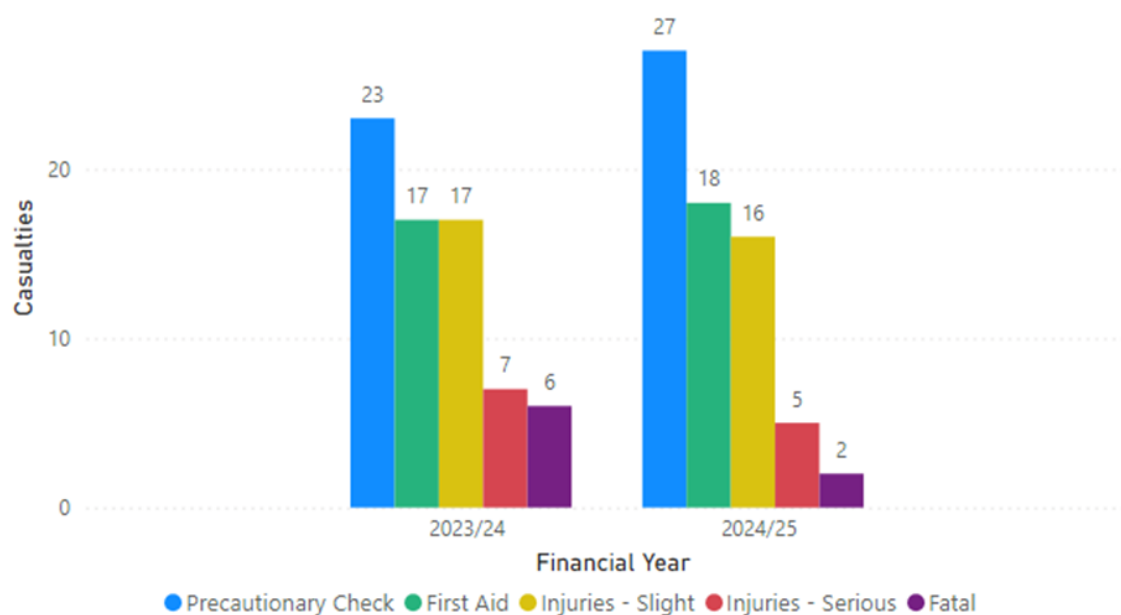
- 'Faulty fuel supply – electricity', which increased by 34.5% from 29 to **39**.
- 'Other', which increased by 22.7% from 22 to **27**.
- 'Negligent use of equipment or appliance (heat source)', which increased by 86.7% from 15 to **28**.



6 Fatalities and Casualties from Accidental Fires in Dwellings

A total of **68** people sustained injuries at the **53** ADFs where an injury of any form was recorded. **Two** fatalities were recorded during the period.

The number of people injured (including fatalities) as a consequence of an ADF has decreased 2.9%. The number of ADFs where an injury was recorded has also decreased by 5.4%.



Of the **68** casualties, **52** (76.5%) were 'Overcome by gas, smoke or toxic fumes; asphyxiation', **five** sustained slight burn injuries, **three** sustained severe burn injuries, **two** had 'Breathing difficulties (other than 'overcome by gas, smoke or toxic fumes; asphyxiation)', **two** had a 'Combination of burns and overcome by gas/smoke', and **another** suffered from 'Shock/Anaphylactic shock'. The **one** other casualty's injury type was recorded as 'Other'.

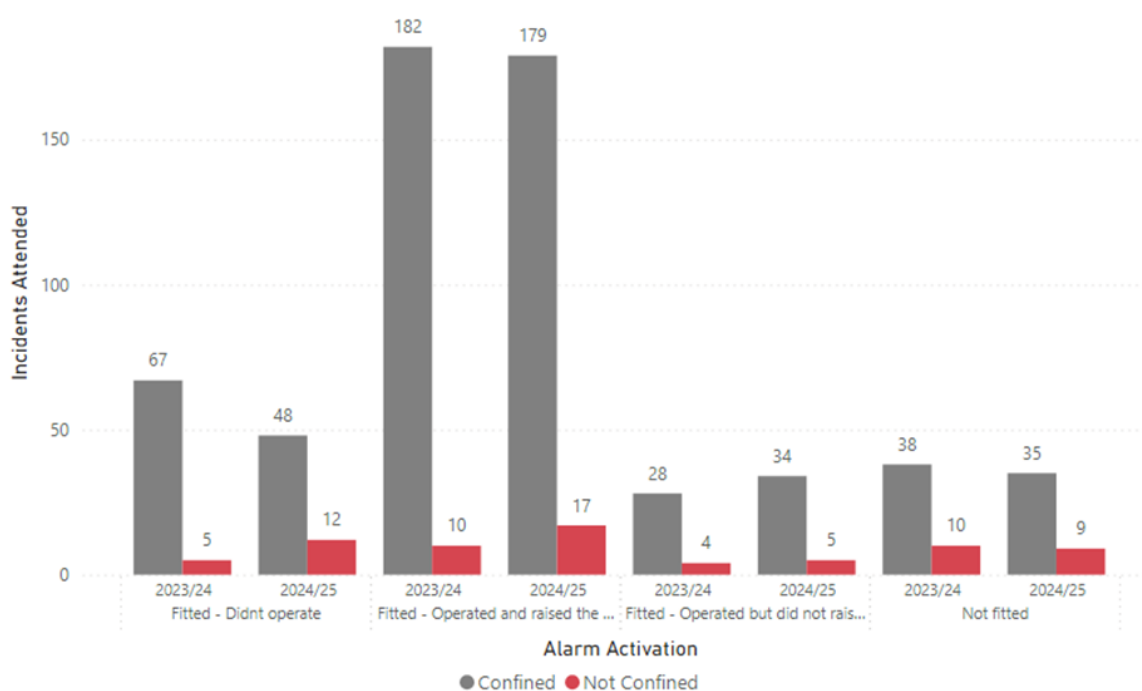
7 Smoke Detectors – Accidental Dwelling Fires

Detectors: smoke/heat detectors were present at **295** (87.3%) accidental dwelling fires attended.

Alarms operated and raised the alarm at **196** (58.0%) ADFs.

Alarms were not fitted at **44** of the ADFs attended.

Of the 338 ADFs attended, **295** were confined to the room of origin, and **43** were not confined.



Actions taken to support the most vulnerable to fires in their homes:

Wholetime and Day Crewed stations undertake one hour's prevention activity using Exeter data (data shared by the NHS) to target households where occupiers aged 65+ years live. Different coloured dots on a map indicate 65+, 75+ and 80+ years old. This enables crews to deliver SAWCs to age groups which may be more at risk from fire.

Hot spotting activities are undertaken after incidents which results in different levels of post incident response.

The Campaign Steering Group (CSG) continues to work with the Corporate Communications team to proactively promote fire, road, and water safety across all media platforms.

Educational Visits to Schools in Q4

Latest school figures Q4 – January 1, 2025 – 31 March 2025

- Primary Schools Visited = **17**
- Pupils = **1,113**

- Crucial Crew = **2**
- Pupils = **400**

- Station Visit = **1**
- Pupils = **20**

- Playgroup = **1**
- Pupils = **15**

Phoenix

- Five courses with **57** attendees.

Fire Setter Interventions

- **18** Firesafe sessions delivered by DangerPoint
- During the financial year, a total of **six** Fire Awareness Child Education (FACE) referrals were received.

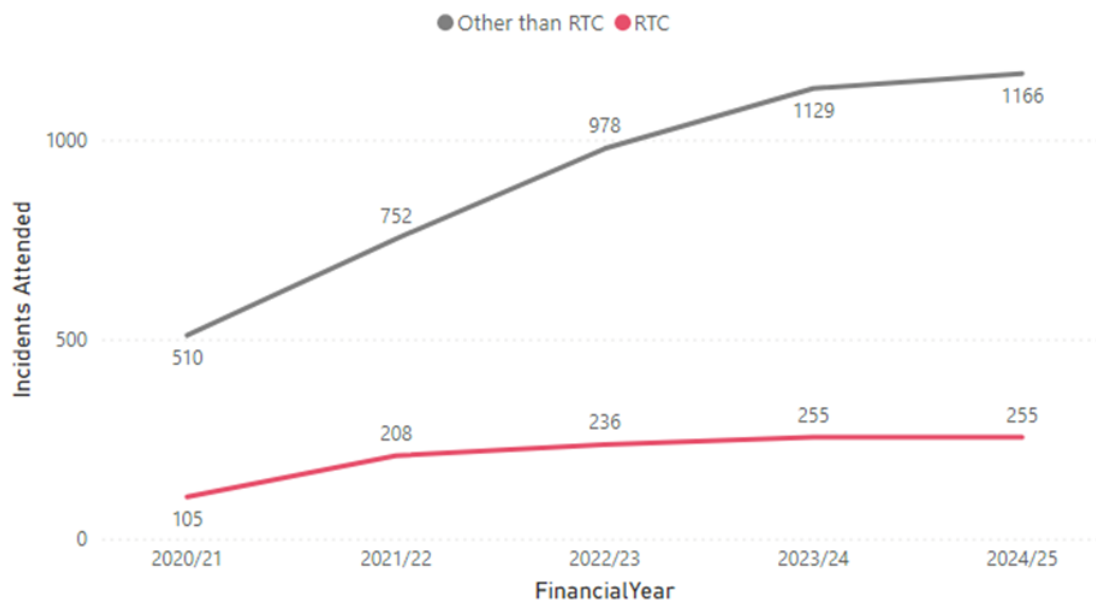
DangerPoint

6,414 young people attended through the Home Safety scenario up to the end of quarter four.

8 Special Service Calls (SSCs)

A total of **1,421** special service calls (including Road Traffic Collisions (RTCs)) were attended. This is an increase of 2.7%.

The number of RTCs attended remained the same as last year with **255** attended.



Other than RTC categories which saw the largest **increase** in attendances included:

- **531** 'Assist other agencies' incidents – an increase of 10.4% from 481.
- **92** 'Other rescue/release of persons' incidents – an increase of 27.8% from 72.
- **78** 'Lift Release' incidents – an increase of 62.5% from 48.

Despite this, other categories saw a **decrease** in the number of incidents attended. These included:

- **76** 'Flooding' incidents – a decrease of 35.6% from 118.
- **77** 'Effecting entry/exit' incidents – a decrease of 29.4% from 109.

Actions taken to date:

Operation Ugain

During quarter four, the roadside safety presentation was delivered to **169** people who were caught driving over the 20mph speed limit. The year to date, the figure is now **3,183**.

Olivia's Story

Olivia's Story was delivered throughout quarter four to **800** 16 to 25 year olds.

Olivia's Story continues to be delivered by the Fire Safety Watch Managers and remains current and extremely impactful. Sessions are often supported by North Wales Police.

9 Safe and Well Checks

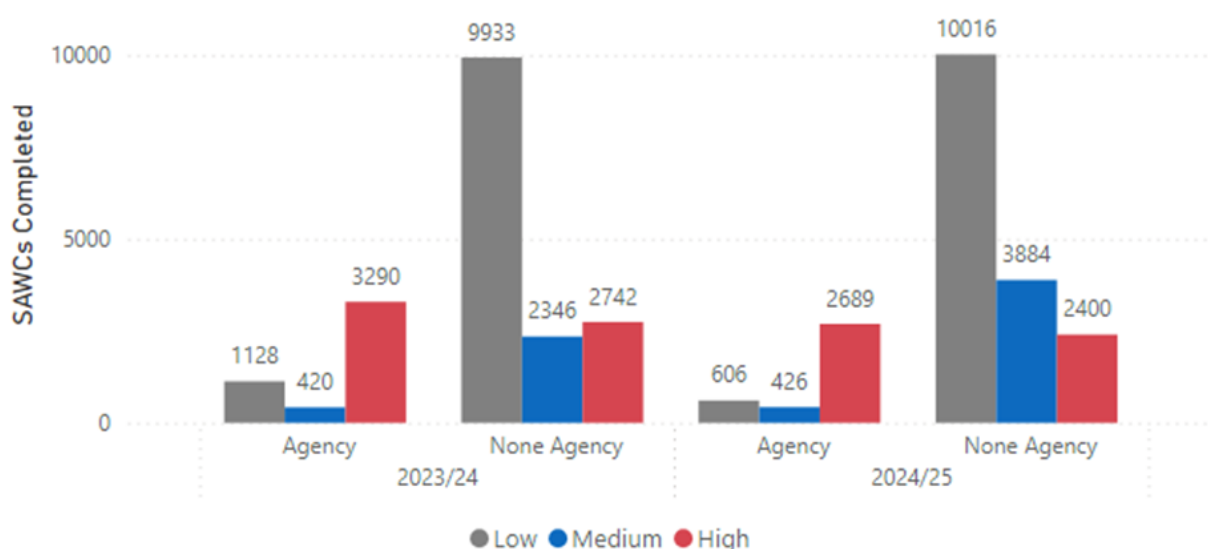
A total of **20,021** SAWCs were completed, of which:

- **5,089** (25.4%) were High priority, with **2,689** (52.8% of high priority checks completed) coming from a partner agency.
- **4,310** (21.5%) were Medium priority, with **426** (9.9% of medium priority checks completed) coming from a partner agency.
- **10,622** (53.1%) were Low priority, with **606** (5.7% of low priority checks completed) coming from a partner agency.

A total of **3,721** SAWCs completed were referred to the Service from an Agency – this equates to 18.6% of SAWCs completed.

Whilst there has been a **0.8%** increase in the number of SAWCs completed compared with the same period last year, there has been a **15.6%** decrease in the number of high priority SAWCs completed. This is the second lowest number of high priority checks conducted during the last five financial years. There has also been a **4.0%** decrease in the number of low priority SAWCs completed.

Despite this however, it goes without saying that all SAWCs completed are valuable, and the total of medium priority checks has grown **55.8%** compared with the same period last year. This is the highest number of medium checks recorded in the last five years.



Actions taken to date:

Members of the Prevention team have been attending Wholetime Duty and Day Crewed Duty stations, and have started to join the duty Watches' daily prevention allocated activity. This will assist in the sharing of information and help promote best practice, and has enabled quality assurance to take place on the standard of SAWCs, as well as on the information issued.

Prevention staff continued with engagement sessions with external partners to help ensure we receive only the most targeted referrals for SAWCs. Examples of those engaged with during quarter four include, CHMT at Ysbyty Alltwen, Adult Social Services, Occupational Therapists, housing associations, and North Wales Police's project "Clear Hold Build".

Development of our prevention staff continues in line with the Department Objectives with at least 2 x 30 mins sessions each month using both external and internal providers. Training has included Ask & Act, Equality Diversity and Inclusion, and De-escalation training.

During this reporting period, the completion rate for high-priority Safe and Well Checks (SAWCs) has declined due to a combination of operational and strategic factors. The Prevention Team has been operating with reduced capacity following the absence of one Home Safety Support Worker and the temporary promotion of another to cover a Partnership Manager role. This has placed additional strain on remaining resources.

In parallel, we have worked closely with partner agencies to improve the quality of high-risk referrals. This strategic decision was made to ensure that referrals are both suitable and sufficient, avoiding an influx of low-quality referrals that could compromise our ability to prioritise effectively. By focusing on quality over quantity, we aim to ensure that visits are conducted within the 28-day target period and are meaningful in terms of risk reduction.

Additionally, we are collaborating with operational crews to review and improve how SAWCs are scored. This includes ongoing training and support to ensure consistency and accuracy in risk assessment. We have also transitioned to using Exeter data, which enables us to better target individuals aged 65 and over, those most vulnerable to fire risk.

These measures are part of a broader effort to enhance the effectiveness and impact of our prevention work, and we anticipate improvements in performance as staffing stabilises and training initiatives take effect.

Further Actions:

From Q1 2025/26, watches will increase to two hours prevention activity per pump per day shift.

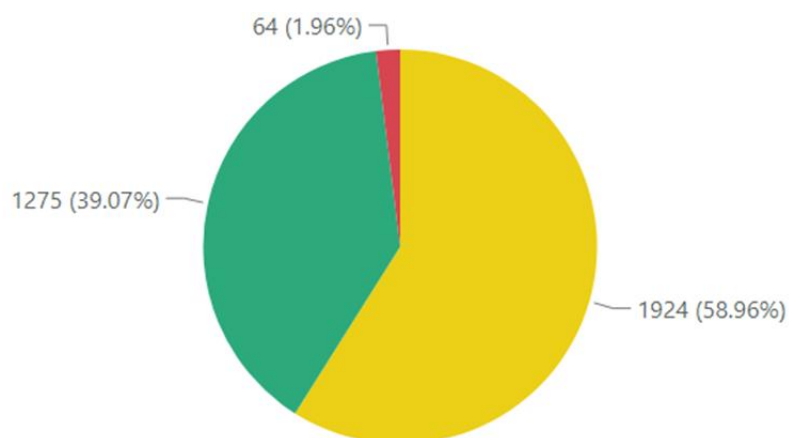
Our Protection Principle



10 False Alarms

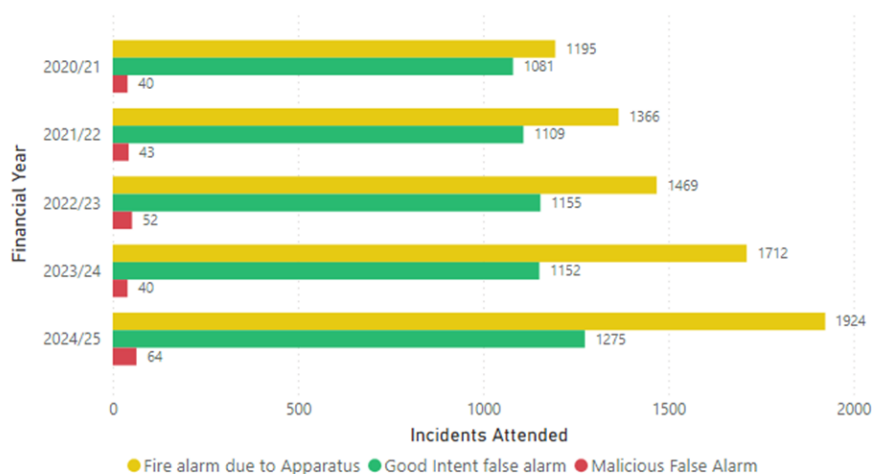
A total of **3,263** false alarms have been attended, which is an increase of 12.4%. This total is inclusive of false alarms attended across all property types.

A rise has been recorded across all false alarm categories, with a 12.4% increase in Fire alarm due to apparatus (1,712 to **1,924**), a 60.0% rise in Malicious False Alarms (40 to **64**), and a 10.7% increase in Good Intent False Alarms (1,152 to **1,275**). All false alarm categories are now at their highest levels compared with the last five years.



● Fire alarm due to Apparatus ● Good Intent false alarm ● Malicious False Alarm

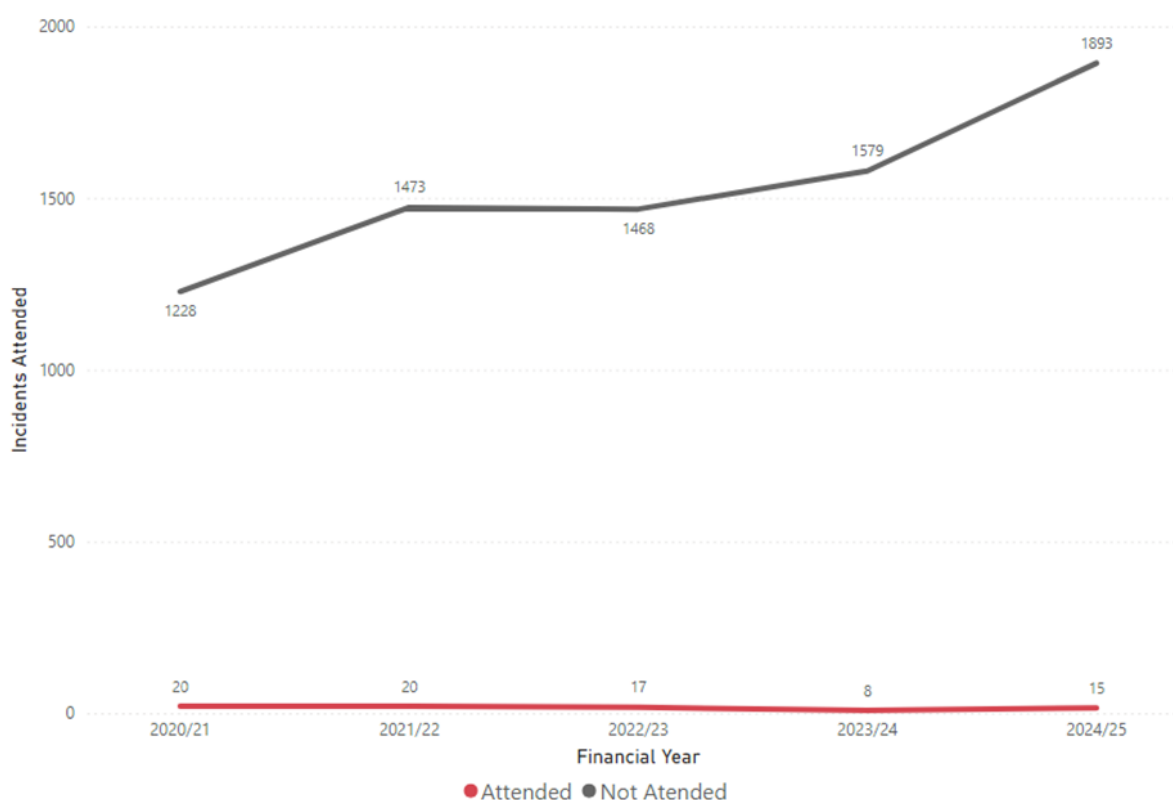
Guidance continues to be provided Control's Watches by the Control Management Team on the practices that need to be adhered to when recording the category of false alarm.



11 Commercial Automatic Fire Alarm (AFA) calls

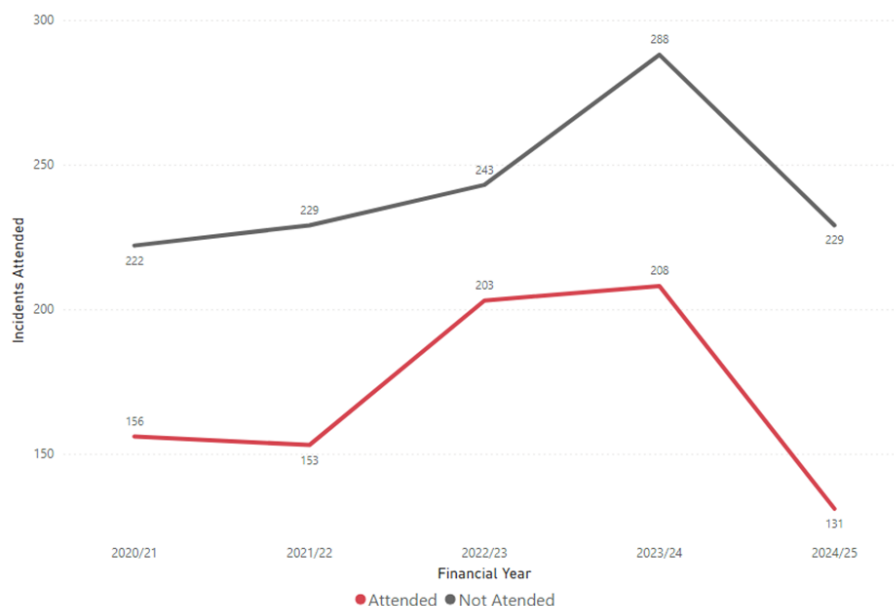
1,908 Commercial AFA calls were received during the reporting period, which is the highest number of calls received during the last five years. Despite this however, only 0.8% were attended (**15**).

Despite **15** Commercial AFAs being attended, it has been confirmed that some of these were due to the addresses being exempt from the procedure as they were a risk site, and pre-agreed as exempt. There was also one that was thought to be domestic, however en route it became apparent that it was commercial.



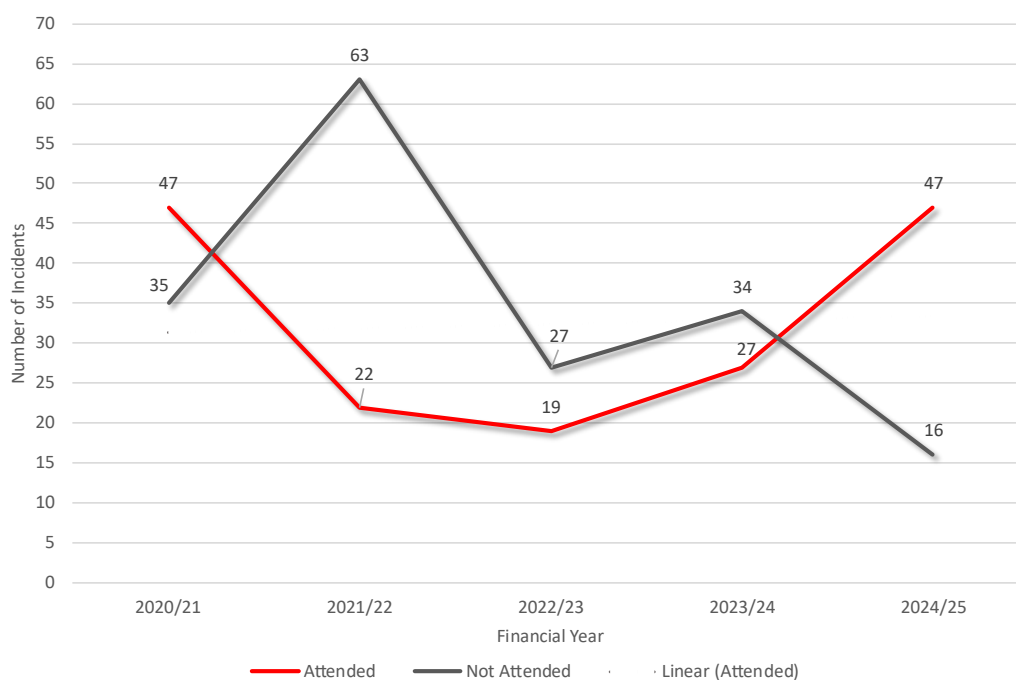
12 Hospital AFA calls

360 Hospital AFA calls were received, which is a reduction of 27.4% and the lowest number of hospital AFA calls received in the last five years. **131** were attended, a reduction of 37.0% from 208.



13 HMP Berwyn

63 primary fires were started deliberately at HMP Berwyn, and of these **47** were attended - this is 74.1% more than last year.



Actions taken to date:

Hospitals

Hospital AFA calls have reduced significantly in the last 12 months, with collaboration between NWFRS and BCUHB in relation to managing false alarms at the forefront of that reduction. NWFRS will endeavour to attend any fire incident to assist with compliance with the RR(FS)O and the reduction in further incidents. Feedback is sought by both parties following incidents of note on working practices and ensuring procedures are adhered to. Regular meetings are taking place, and a programmed audit process is in discussion.

HMP Berwyn

HMP Berwyn continues to rise in the number of incidents we have there. We are engaging with the Crown inspector for HM Prisons on a regular basis and will be assisting him in his inspection programme at HMP Berwyn in late May 2025. The incidents are predominately vape based, with the dismantling of those devices and utilising the battery as an ignition source. During meetings we are trying to address this situation and ignition source by looking at alternatives with the Crown Inspector and assisting him in his research into this problem. Incidents are unlikely to reduce in the short term due to this issue.

Rising Automatic AFA incidents

North Wales Fire and Rescue Service (NWFRS) has observed a sustained increase in Automatic Fire Alarm (AFA) incidents over recent years, with a 56.8% rise in total AFA calls across all property types from 2020/21 to 2024/25. A significant proportion of these calls originate from dwellings, particularly those monitored by careline providers such as Galw Gofal and Delta Wellbeing.

This trend presents both operational and strategic challenges. While many of these calls are ultimately deemed false alarms, often triggered by cooking smoke, equipment faults, or environmental factors such as steam, they still require a full emergency response, diverting resources from genuine emergencies and prevention work.

To address this, NWFRS is taking a multi-pronged approach:

- **Data-Driven Analysis:** We are closely monitoring trends in AFA activations, with a focus on high-frequency sources such as careline-monitored dwellings. This includes detailed breakdowns by provider and region (e.g., Flintshire and Wrexham).
- **Partnership Engagement:** We continue to work collaboratively with careline providers to ensure only essential calls are transferred to

NWFRS. Delta Wellbeing, for example, maintains a low transfer rate despite a growing client base, demonstrating effective triage protocols.

- Targeted Prevention: By identifying common causes—such as cooking smoke and faulty equipment—we are developing targeted prevention messaging and interventions for vulnerable residents.
- Operational Efficiency: We are reviewing our response protocols and exploring opportunities to reduce unnecessary mobilisations without compromising safety, particularly in low-risk scenarios.
- Public Education and Training: We are enhancing public awareness around common false alarm triggers and working with residents and care providers to reduce avoidable activations.

Our Response Principle



14 RDS Station Availability

The below table shows the average pump availability for all RDS Stations between 06:00 and 18:00. The availability is broken down by month, showing the respective weekday and weekend/bank holiday availability.

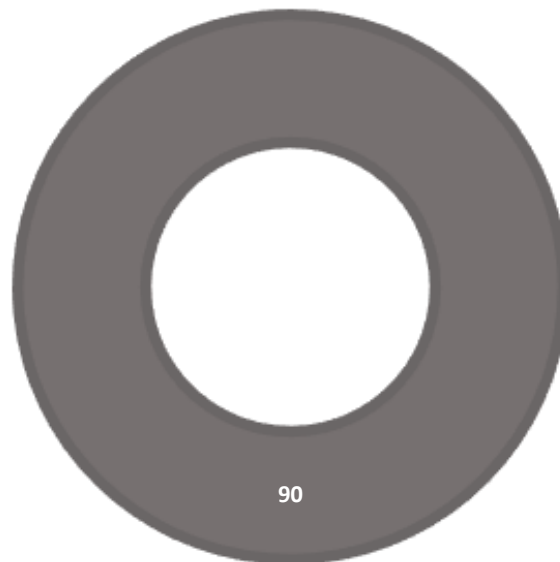
The table is representative of all RDS watches that are not based at wholetime or day crewed stations.

Average of RDS Stations Availability 06:00-18:00												
Day/Month	April	May	June	July	August	September	October	November	December	January	February	March
Weekday	5	4	4	5	4	4	4	5	6	7	6	6
Weekend (incl. Bank Holiday)	12	13	11	11	11	10	11	12	14	15	14	12
Overall Average	7	7	6	6	7	6	6	7	9	9	8	8

N.B. Availabilities have been rounded down to the nearest whole number.

15 Planned 18 Pump Availability

■ 100% Pump Availability Met ■ 100% Pump Availability Not Met



Number of Days Planned Availability Achieved	
100% Pump Availability Met	
Weekday	63
Weekend/Bank Holiday	27
100% Pump Availability Not Met	
N/A	0

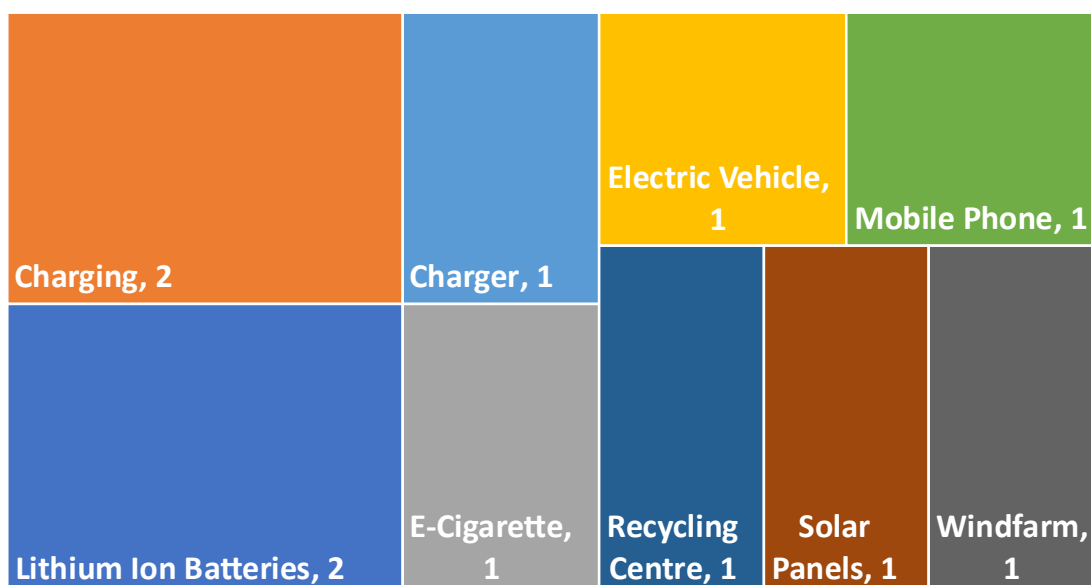
16 Emerging Technologies

As technology evolves and our societal reliance upon it increases, it has become apparent that new and complex risks are presented to our Fire Service. Emerging technologies can make up a variety of forms, including things like:

- Electric Vehicles
- Wind Farms
- Devices containing Lithium-Ion Batteries

As many of these technologies are not currently captured within the Home Office's Incident Recording System (IRS), key word searches are conducted on incident logs in order to find the relevant incidents. Work is currently being undertaken by the Home Office and FRSs across the UK to integrate these technologies into their new incident recording system, the Fire and Rescue Data Platform (FaRDaP), with a view of this data being captured from the start of Q2 in 2025/26. Incidents recorded before this period will still need to be extracted using key word searches.

The below table summarises attended incidents relating to emerging technologies. This data covers the period of January 2025 to March 2025 and includes all incident categories.



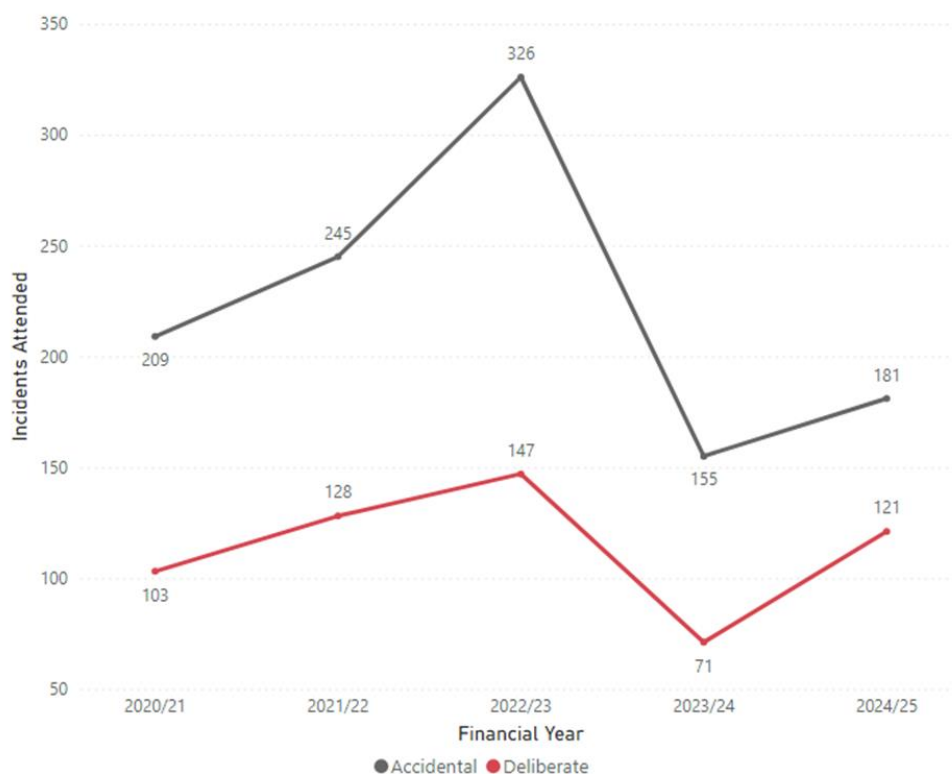
N.B. In some cases, the cause has been assumed rather than confirmed due to the nature of the incident.

Our Environment Principle



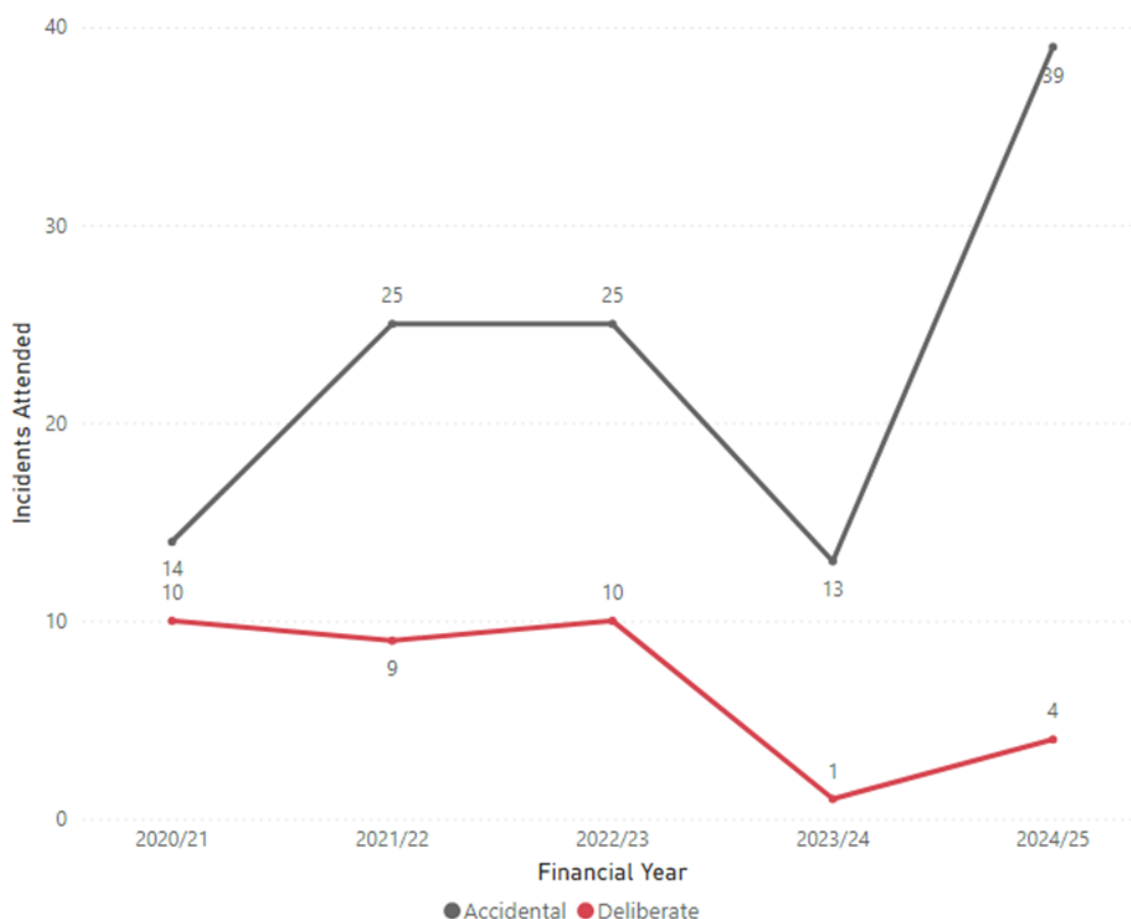
17 Grassland, woodland and crop fires

302 Grassland, woodland and crop fires were recorded, a 33.6% increase from 226. Despite the increase, the total incidents attended is still 15.4% below the three-year average of 357.



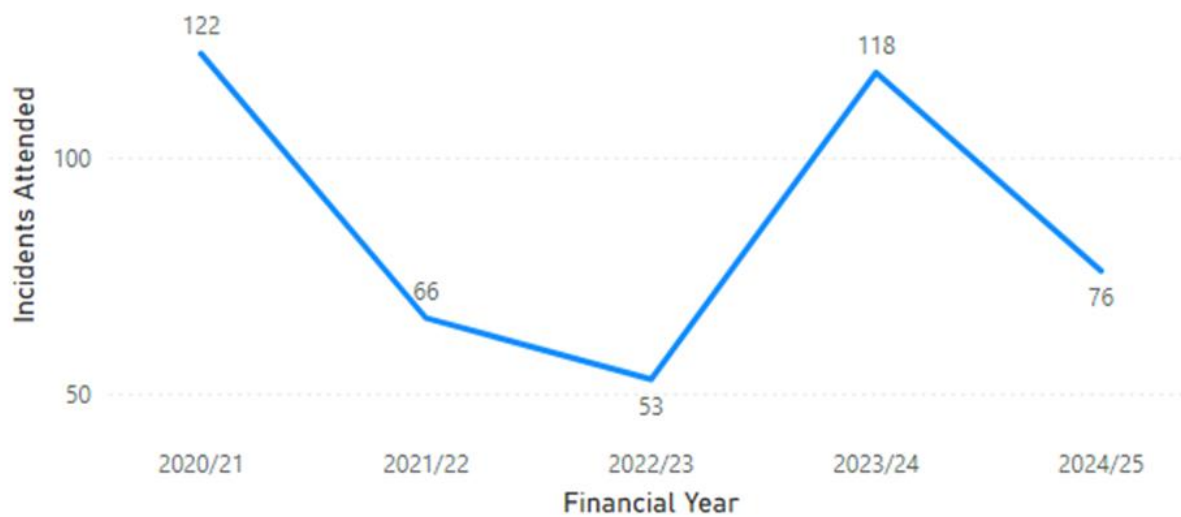
18 Wildfires

43 wildfires were attended, an increase of 207.1%, and 53.6% above the three-year average of 28. As a result, the time spent monitoring wildfire incidents increased to over 654 hours, compared with just over 479 hours during the same period of the previous year.



19 Flooding

There were **76** flooding incidents attended, a 35.6% decrease from 118, and three less incidents than the 3-year average of 79.




Advice was given at **34** incidents, whilst **15** incidents were attended to make the scene safe.

Glossary

Fires	All fires fall into one of three categories – primary, secondary or chimney.
Primary Fires	<p>These are fires that are not chimney fires, and which are in any type of building (except if derelict), vehicles, caravans and trailers, outdoor storage, plant and machinery, agricultural and forestry property, and other outdoor structures such as bridges, post boxes, tunnels, etc.</p> <p>Fires in any location are categorised as primary fires if they involved casualties, rescues or escapes, as are fires in any location that were attended by five or more fire appliances.</p>
Secondary Fires	<p>Secondary fires are fires that are neither chimney fires nor primary fires.</p> <p>Secondary fires do not involve casualties, rescues or escapes, and will have been attended by four or fewer fire appliances.</p> <p>Secondary fires are those that would normally occur in locations such as open land, in single trees, fences, telegraph poles, refuse and refuse containers (but not paper banks, which would be considered - in the same way as agricultural and forestry property - to be primary fires), outdoor furniture, traffic lights, etc.</p>
Chimney Fires	<p>These are fires in occupied buildings where the fire is confined within the chimney structure, even if heat or smoke damage extends beyond the chimney itself.</p> <p>Chimney fires do not involve casualties, rescues or escapes, and will have been attended by four or fewer fire appliances.</p>
Special Service Incidents	<p>These are non-fire incidents which require the attendance of an appliance or officer and include:</p> <ul style="list-style-type: none"> a) Local emergencies e.g., flooding, road traffic incidents, rescue of persons, 'making safe' etc; b) Major disasters; c) Domestic incidents e.g., water leaks, persons locked in or out etc; d) Prior arrangements to attend incidents, which may include some provision of advice and inspections.
False Alarm (general guidance)	<p>Where the FRS attends a location believing there to be an incident, but on arrival discovers that no such incident exists, or existed.</p> <p>Note: if the appliance is 'turned around' by Control before arriving at the incident it is not classed as having been attended and does not need to be reported.</p>

False Alarms - Malicious	These are calls made with the intention of getting the FRS to attend a non-existent incident, including deliberate and suspected malicious intentions.
False Alarms – Good Intent	These are calls made in good faith in the belief that the FRS really would attend a fire or special service incident.
False Alarms - AFA	These are calls initiated by fire alarm and fire-fighting equipment. They include accidental initiation of alarm apparatus or where an alarm operates and a person then routinely calls the FRS as part of a standing arrangement, i.e., with no 'judgement' involved, for example from a security call centre or a nominated person in an organisation.
Building - Dwellings	A property that is a place of residence, i.e., occupied by households, excluding hotels, hostel and residential non-permanent structures.
Building - Non-Residential	Properties such as hospitals, offices, shops, factories, warehouses, restaurants, cinemas, public buildings, religious buildings, agricultural buildings, railway stations, sheds, prisons.
Building - Other Residential	Properties such as hotels, hotels and residential institutions B&Bs, Nursing/care homes, student halls of residence.
Vehicle (Road and Other Transport)	Road vehicle, rail vehicle, aircraft, boat.
Outdoor	Fields, grassland, woodland, refuse containers, post boxes.
Wildfires	A grassland, woodland and crop fire where the incident was attended by 4 or more vehicles, or the Service was in attendance for 6 hours or more, or where there was an estimated fire damage area of over 10,000 square meters.
Short Term Sickness (STS)	Absences 27 calendar days and under.
Long Term Sickness (LTS)	Absences 28 calendar days and over.

Report to	North Wales Fire and Rescue Authority	
Date	21 July 2025	
Lead Officer	Anthony Jones, Assistant Chief Fire Officer	
Contact Officer	Mike Plant, Head of Planning, Performance and Transformation	
Subject	Chief Fire and Rescue Advisor and Inspector for Wales's Inspection Report	

PURPOSE OF REPORT

- 1 This report presents an update following the publication of the Chief Fire and Rescue Advisor and Inspector for Wales (CFRAIW) inspection report, entitled 'Inspection of North Wales Fire and Rescue Service to consider the effectiveness of its response to domestic dwelling fires'

EXECUTIVE SUMMARY

- 2 The CFRAIW completed thematic inspections of operational effectiveness of South Wales and Mid and West Wales Fire and Rescue Services in 2024 and published inspection reports in October 2024 and January 2025 respectively. He undertook a similar inspection of North Wales Fire and Service (the Service) early in 2025.
- 3 These three inspections resulted in recommendations for each service and the recommendations broadly map across three categories: the need to implement the CFRAIW previous thematic review recommendations, the services' need to review operational guidance and training programmes in relation to responding to dwelling fires, and the services' operational assurances policy and processes.

OBSERVATIONS FROM EXECUTIVE PANEL/AUDIT COMMITTEE

- 4 The Inspection Report was presented to Executive Panel on 16 June 2025, where the CFRAIW Dan Stephens presented his findings in person.

RECOMMENDATION

- 5 It is recommended that Members:
 - i) **Note the content of the report; and**
 - ii) **Note that the action plan has been put in place to consider the recommendations of the CFRAIW's inspection.**

BACKGROUND

- 6 In January 2025 the CFRAIW commenced the inspection of North Wales Fire and Rescue Service (the Service) by completing a desk top review of the Service's firefighting and operational assurance policies, standard operating procedures and training packages.
- 7 Furthermore, the CFRAIW completed a detailed review of dwelling fire incident logs, between the period of 1 April 2021 to 31 March 2023, conducting interviews with relevant officers, crews across all duty systems and focus groups consisting of key stakeholders.
- 8 The Service's inspection report was published in May 2025 presenting a total of six recommendations. Each recommendation was timebound.
- 9 The recommendations will be included in an action plan that will be considered and managed through the Service's Organisational Learning Committee, chaired by ACFO Justin Evans.
- 10 The CFRAIW made particular note that the observations made in the report are not intended, and should not be taken, as a criticism of North Wales Firefighters, Officers or their training instructors.

INFORMATION

- 11 The Fire and Rescue National Framework 2016, includes the provision for the CFRAIW to undertake reviews and provide information and findings to Welsh Ministers, Fire and Rescue Authorities (FRAs) and the Auditor General for Wales.
- 12 The CFRAIW commenced a series of inspections commencing in South Wales Fire and Rescue Service in July and August 2024 following a request of the Commissioners appointed by Welsh Ministers. The South Wales FRS inspection report was published in October 2024 presenting a total of six recommendations to the Service.
- 13 The recommendations, broadly map across three categories: the need to implement the CFRAIW previous thematic review recommendations, South Wales FRS's need to review its operational guidance and training programmes in relation to responding to dwelling fires, and its need to review its Operational Assurances policy and processes. Each recommendation was timebound.

- 14 The CFRAIW then proceeded to undertake an Inspection of Mid and West Wales FRS in October and November 2024 following the same methodology. The Mid and West Wales FRS inspection report was published in January 2025 presenting a total of six recommendations. Each recommendation was timebound.
- 15 The CFRAIW highlighted that similarities were found to the South Wales FRS inspection report, and the recommendations are similarly broadly mapped across three categories: the need to implement the CFRAIW previous thematic review recommendations, Mid and West Wales FRS's need to review its operational guidance and training programmes in relation to responding to dwelling fires, and the need for it to review its operational assurance policy and processes.
- 16 The CFRAIW makes early narrative that all three Welsh Fire and Rescue Services should look to address the similarities within the two inspections reports published at that time, without predicating the outcome of the inspection report of the Service.
- 17 In response to this and ahead of our own inspection, the Service undertook several early actions.
- 18 The Head of the Organisational Learning Group visited the Netherlands Fire Service as part of a National Fire Chiefs Council review team. The purpose of the visit was to look at how the Netherlands have reviewed their firefighting tactics in line with the evolution of building materials, and the fire-fighting research identified in the previous reports.
- 19 The Service commenced a review of its overarching firefighting tactics strategy on an "All Wales" basis. Meeting with the other two Welsh FRS, to reduce duplication of effort and ensure an integrated "All Wales" approach to sharing training materials and strategy documents.
- 20 The Service has instigated that flowmeters are fitted on all new fire appliances, and that a program for retrofitting and increase from 19 to 22ml hose reel bore on existing appliances is implemented in line with the recommendations.
- 21 On 10 December 2024, the CFRAIW wrote to the Chief Fire Officer (CFO) informing her of his intention to complete a thematic Inspection of Operational Effectiveness in early 2025, following the same methodology as the previous two inspections.

- 22 The CFRAIW inspection report of the Service was published on 20 May 2025.

Appendix A - Inspection of North Wales Fire and Rescue Service to consider the effectiveness of its response to domestic dwelling fires report, May 2025.

IMPLICATIONS

Well-being Objectives	This paper is aligned to the Principles of Response and People within the Community Risk Management Plan 2024 -2029 as it includes firefighter safety, support of operational preparedness and ensures sustainability over the longer term.
Budget	Any budget requirements, linked to the management of the recommendations, will be evaluated through the existing budget management processes.
Legal	The role of the CFRA is included in chapter 7, points 7.12 and 7.13 of the Fire and Rescue National Framework 2016 and Section 28 of the Fire and Rescue Services Act 2004.
Staffing	N/A
Equalities/Human Rights/ Welsh Language	N/A
Risks	All risks associated with the recommendations will be included in an action plan managed by the members of the Service's Organisational Learning Committee.



Inspection of the North Wales Fire and Rescue Service to consider the effectiveness of its response to domestic dwelling fires

May 2025

Inspection of the North Wales Fire and Rescue Service to consider the effectiveness of its response to domestic dwelling fires

Dan Stephens, Chief Fire and Rescue Advisor and Inspector, Welsh Government

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Executive summary

1. This report sets out the findings of an inspection of the North Wales Fire and Rescue Service undertaken in January and February 2025 using the same methodology as that for the 2024 inspections of South and Mid & West Wales Fire and Rescue Services.
2. The purpose of the inspection was to assess the operational effectiveness of the Service when responding to domestic dwelling fire incidents.
3. The incident type selected for analysis was dwelling fires where fire and heat damage was recorded beyond the room within which the fire had started. These incidents present significant risk to Firefighters, trapped occupants and to the dwelling itself.
4. A total of 139 incidents occurring between 1 April 2021 – 31 March 2023 were analysed in detail.
5. The findings of the incident analysis are consistent with that of the South Wales and Mid & West Wales inspections, set out within the reports published on 9 October 2024 and 15 January 2025 respectively.
6. Given the weight of evidence available to me I consider that the operational tactics employed by the Service, at a substantial number of incidents, have placed Firefighters at unnecessary risk and/or resulted in avoidable damage to properties.
7. The underlying reason for this is that much of the content of the structural firefighting training delivered by the Service reflects tactics partially introduced in the late 1990s, several of which were not scientifically proven at the time or designed for use within the UK.
8. The position in North Wales is compounded by the withdrawal of legacy Service Operational Policy and Procedure Orders and their replacement with Aide Memoirs. This creates a significant gap in operational guidance. It also leaves the Service exposed through the absence of suitable and sufficient Operational Risk Assessments for all incident types, including dwelling fires, which is a legal requirement.
9. Of significant concern is the lack of resourcing available to the Service in respect of its managerial and wholetime operational response capacity. The number of Middle Managers is largely predicated on that required for operational cover purposes. This is not the same as the minimum number required to adequately resource all essential functional roles. The same is true of Supervisory Manager numbers in functional roles.
10. Substantial capacity exists within the station work routine for wholetime Firefighters conditioned to the shift and day crewing systems. The recommendations of the 2021 Thematic Review into Fire and Rescue Service capacity should be actioned without any further delay to safely release this capacity to increase the training necessary to address the issues identified through this report and risk

reduction activity. This capacity however cannot realistically be deployed to fill gaps in functional areas. It also does not mean that there are enough wholetime appliances available to the Service to deliver an effective cover model considering the geographical challenges and population distribution.

11. The issue of the resourcing of the Service falls outside the scope of this inspection however it is a cause for concern and one that needs to be addressed.

12. The training facilities available to instructors cannot fully recreate scenarios that are reflective of the modern fire environment. There is an opportunity for the Service to significantly improve training facilities through the development of a new Training Centre. This should be progressed as a priority.

13. Operational assurance is a challenge for the Service particularly in remote rural locations. The operational assurance arrangements within the Service largely reflect the available resourcing. There is no dedicated Operational Assurance Team to attend incidents solely for the purposes of active monitoring and to undertake post incident audit and review. Instead, active incident monitoring is undertaken by duty Officers.

14. There is a well embedded hot debrief process which has the confidence of Firefighters. Access to the outcomes from structured debriefs however is limited to a dedicated Teams channel which restricts visibility for station-based Firefighters.

15. The lack of any available near miss reports from incidents is a concern.

16. It has not been possible to avoid replicating the recommendations within the South and Mid & West Wales reports in this report as the issues identified are identical.

17. The underlying issues highlighted across all the inspections predominantly relate to legacy National Operational Guidance. The publication in October 2024 of the 'Foundation for firefighting' and 'Firefighting' operational guidance and the relevant recommendations in this and the previous inspection reports should serve as a catalyst for the pan Wales development of operational guidance and training based on the most current research and designed in such a way to be of maximum utility to Firefighters.

18. The recommendations made in this report in relation to the operational assurance process reflect those made to Mid & West Wales Fire and Rescue Service as the geographic challenges are very similar.

19. It is important that I again make the point that the observations made in this report are not intended and nor should they be taken as a criticism of North Wales Firefighters, Officers or their training instructors.

20. The levels of engagement with all staff throughout the inspection were excellent. Firefighters, Officers and training instructors were very receptive to the adoption of evidence-based tactics and enhancements to the operational assurance process.

21. The recommendations in this report should be acted on without delay to ensure they are operating to the safest possible systems of work.

Introduction and background

22. The inspection of North Wales Fire and Rescue Service (NWFRS) during January and February 2025 is the last in a series of three inspections to consider the effectiveness of the Welsh FRS when responding to domestic dwelling fires. There is significant duplication between the three inspection reports. This duplication occurs predominantly with the explanation of how a fire in a room develops, how the tactics employed by the FRS affect the outcomes of the incident and with the description of the background to the development of recent operational guidance in the UK FRS. There is also duplication with the findings and recommendations as many of the issues identified are the same.

23. The incident type presenting greatest risk to Firefighters, members of the public and their homes are fires in domestic dwellings, whether they be started accidentally or deliberately. Information relating to these incidents is captured through the Incident Recording System (IRS) and is published on the Welsh Government StatsWales website¹.

24. To maintain consistency, I analysed the same data set as I had for the South Wales and Mid & West Wales inspections. The figures for NWFRS are as follows:

- 2020/21 (387 incidents);
- 2021/22 (429 incidents); and,
- 2022/23 (380 incidents).

25. I again focused specifically on dwelling fire incidents where fire or heat damage was recorded beyond the room in which the fire started, referred to from here on in as the Room of Origin (ROO). This is because these are the most serious of this incident type.

26. Over the 3-year period this amounted to a total of 139 incidents, although on analysing each incident log in detail I established that 42 incidents had been miscoded leaving an actual total of 97 incidents that met what I considered to be the true definition of fire or heat damage spread beyond the ROO within a domestic dwelling.

27. The definitive point of reference for any incident is the incident log held on the mobilising system. The incident log is a digital record that is generated from the first 999 call to the Service and contains every single transaction relating to the incident including all messages sent from the incident ground. I was given full access to the NWFRS mobilising system (CAD View) by the Chief Fire Officer (CFO). To triangulate the information contained within the incident logs I accessed fire investigation reports where they were available.

28. Prior to undertaking the inspection fieldwork, I reviewed all relevant operational guidance and associated training materials which I accessed live through the NWFRS intranet (Hwb Tân) and pdrPro/Learn Pro Operational Learning System. This

¹ [Fires and false alarms \(gov.wales\)](https://gov.wales)

consisted of Aide Memoirs, which NWFRS have introduced in place of Service Operational Policy and Procedure Orders (SOPPOs), the extant Service Administrative Policy and Procedure Order (SAPPO) for Operational Assurance, the draft Operational Assurance Policy and Procedure along with training materials relevant to the same.

29. The fieldwork included focus groups with Compartment Fire Behaviour Training (CFBT) instructors, Station and Group (Middle) Managers conditioned to the flexible duty system, structured interviews with the Operational Guidance Manager, the Training Programme Development Manager, the Group Manager with responsibility for fire investigation, the Group Manager responsible for operational assurance and station visits at 3 wholetime shift, 3 wholetime day crewed and 3 Retained Duty System (RDS) stations.

30. This report sets out the findings of the inspection and builds on the recommendations made in previous Thematic Review inspection reports.

31. The **first section** of the report contains:

- a review of the data;
- an explanation of how a fire develops within a room;
- how the tactics employed by the FRS affect the outcome of the incident; and,
- what the data shows for NWFRS.

32. The **second section** of the report is aligned to the Health and Safety Executive (HSE) publication HSG 65 Managing for health and safety (pre 2013 version) and considers NWFRS operational policies in so far as they exist through Aide Memoirs, the organisational arrangements to deliver operational policy and how operational performance is monitored, audited and subject to review.

33. The **third section** of the report contains a series of recommendations designed to improve Firefighter safety and the operational effectiveness of NWFRS.

Section 1

A review of the data - Incident Recording System (IRS)

34. In NWFRS Fire Control complete the IRS with information passed to them by the Incident Commander.

35. The IRS records the extent of damage caused by the fire along with details of any injuries or fatalities. It also records where there is no structural damage and no firefighting action. An example would be where residual oil in a grill pan momentarily ignites to generate sufficient smoke to actuate a smoke alarm, resulting in the mobilisation of the FRS. This is the largest single subset of data accounting for between 58 - 65% of all dwelling fire incidents responded to by NWFRS over the reference period and is shown in Table 1 below.

Table 1: No structural damage or firefighting action (overall %)

	2020/21	2021/22	2022/23
Total incidents	387	429	380
No structural damage	227	249	247
No structural damage %	59%	58%	65%

36. The IRS records whether fire or heat damage is contained to the ROO or if it has spread beyond the ROO. It also records the extent of fire or heat damage at the arrival of the FRS. Table 2 below shows the % of dwelling fires confined to the ROO.

Table 2: NWFRS dwelling fires confined to the ROO (overall %)

	2020/21	2021/22	2022/23
Total incidents	387	429	380
Confined to ROO	339	375	330
Spread beyond ROO	48	54	50
Confined to ROO %	88%	87%	87%

37. The subset of incidents where there is fire or heat damage beyond the ROO can be further broken down to incidents where there is (a) no fire or heat damage beyond the ROO on the arrival of the FRS (i.e. the fire is still in the ROO on the arrival of the FRS and then spreads subsequently) or (b) where it is recorded that there is fire and heat damage beyond the ROO on the arrival of the FRS.

38. Table 3 below shows a breakdown of fire and heat damage beyond the ROO broken down into reported as beyond ROO on arrival or fire and heat damage in ROO only on arrival.

Table 3: NWFRS dwelling fires spread beyond ROO

	2020/21	2021/22	2022/23
In ROO on arrival	6	5	3
Beyond ROO on arrival	37	45	43
Total fires spread beyond ROO (IRS)	43	50	46

39. As previously stated, of the 139 incidents in the data set, 42 had been miscoded which left an overall total of 97 incidents that fell within the analysis parameters. A typical example of a miscoded fire from the NWFRS analysis was where the fire occurred within a caravan as opposed to within a house or a flat. Where a fire starting externally had extended into the property to cause fire or heat damage within a room, which then spread beyond the ROO I included these incidents in the analysis.

40. Table 4 shows a breakdown across the 3-year reference period of the 97 incidents that fell within the parameters of the analysis split between in ROO on the arrival of NWFRS or beyond the ROO on the arrival of NWFRS.

Table 4: NWFRS dwelling fires subject to detailed analysis in this report

	2020/21	2021/22	2022/23
In ROO on arrival	5	5	2
Beyond ROO on arrival	25	27	33
Total fires spread beyond ROO (inspection analysis)	30	32	35

An explanation of how a fire develops in a room within a dwelling

41. The following is intended as a simplified explanation of how a fire develops in a room within a dwelling. It duplicates the corresponding section in the South Wales and Mid & West Wales FRS inspection reports published in October 2024 and January 2025 respectively and is provided to set context for the reader without going into excessive detail. It is concerned with a fire that has already ignited in a room within a dwelling and not the mechanisms that cause ignition.

42. For a fire to be sustained it requires heat, fuel, oxygen and an ongoing chemical chain reaction.

43. On the arrival of the FRS a fire in a room within a dwelling will be in one of two states, fuel controlled, or ventilation controlled. The fuel-controlled fire will have sufficient oxygen available such that its growth will be limited only by the item or items (fuel) on fire and their heat release rate (HRR).

44. The HRR is the amount of thermal energy generated by the items (fuel) involved in a fire, measured in Kilowatts (KW) or Megawatts (MW). HRR is not the same as temperature. As an example, a modern single upholstered chair may burn with a flame temperature of 800 degrees centigrade and generate a HRR of 2MW, whereas a modern 3-seater sofa may also burn with a flame temperature of 800 degrees centigrade but generate a HRR of 5MW. Modern, synthetic (plastic) based materials generate a significantly greater HRR than traditional materials. They also consume approximately twice the amount of oxygen than traditional materials to generate the increased HRR.

45. Research demonstrates that an item on fire with a HRR of 2MW (a modern single upholstered chair), can with sufficient available oxygen, cause all the combustible items (fuel) in a room to ignite simultaneously². This transition is called a flashover and will almost certainly result in heat or fire damage beyond the ROO. Suffice to say conditions within a post flashover room are almost certainly unsurvivable for trapped occupants or Firefighters wearing personal protective equipment (PPE) and Breathing Apparatus (BA)³.

46. In the incipient stages of a fire, the fire is most likely to be fuel controlled.

47. In steady state the concentration of oxygen in air is 21%. A fire becomes ventilation controlled when the oxygen concentration in a room on fire drops from 21%, to below 16%, because of the fire consuming the available oxygen faster than it is replenished by air circulating from outside the room. At this point flaming combustion cannot be sustained and the fire goes into decay.

² [Fire Dynamics in Structures| FSRI Safety Academy](#)

³ [Heat Transfer and PPE| FSRI Safety Academy](#)

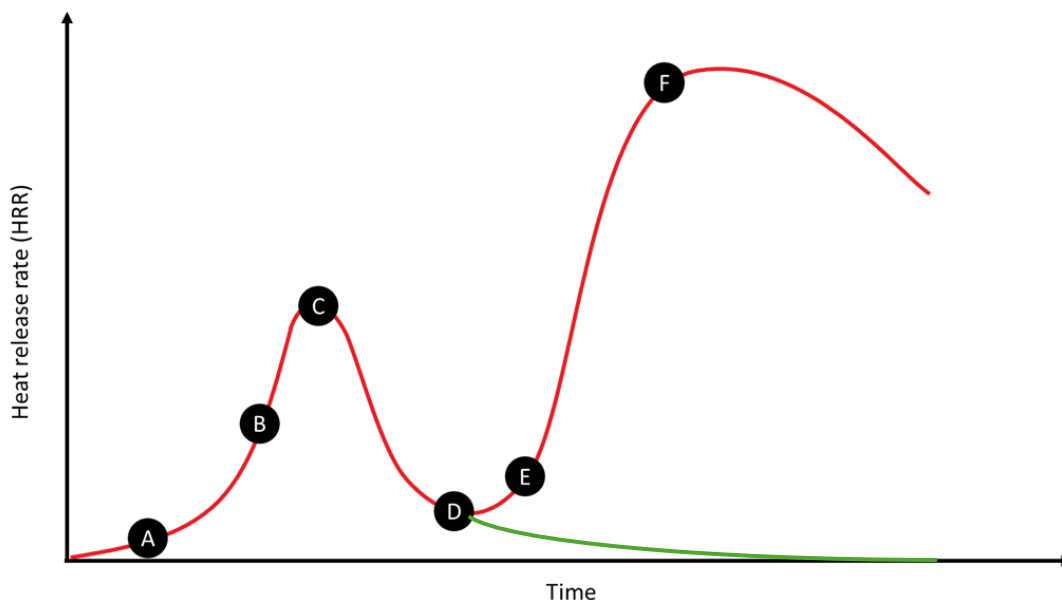
48. The substantial amounts of international research undertaken over the past 10 – 15 years have shown that in rooms furnished with synthetic based materials this occurs within 2-3 minutes, and before a fire in a room transitions to flashover⁴. In essence, this is no different from the science experiment in which a lit candle placed inside an upturned glass jar will burn out after a few minutes, once it has consumed more of the oxygen within the jar than is needed to support combustion.

49. A fire in this state can smoulder for an extended period before eventually it will self-extinguish if there is no change to the supply of oxygen to the fire (the ventilation profile). Such a fire will however generate large volumes of turbulent smoke which is itself combustible, and which will contribute to rapid fire development if there is a change in the ventilation profile.

50. While the fire is stable for as long as the ventilation profile remains unchanged it still presents very significant hazards to trapped occupiers and Firefighters. In all likelihood it will not extend beyond the room of origin without outside intervention (such as Firefighters making entry through an external door and introducing oxygen), nor will it reach flashover.

51. The graph at Figure 1 below shows the typical progression of a fire in a room with a fuel load that has a sufficient HRR to transition the room to flashover (and therefore extend beyond the ROO).

Figure 1: Typical progression of a fire in a room with a fuel load that has a sufficient HRR to transition the room to flashover



⁴ [20150116-ba-ul-fsp-it-depends-descriptive-research-into-fire-growth-and-the-chances-of-survival.pdf](#) (nipv.nl) (Dutch research)/All UL FSRI research studies

Points A - C indicate the development of a fire in a closed room from ignition through to the point where the oxygen content in the room drops below 16%.

Point C – D shows a reduction in HRR because of there being insufficient oxygen available within the room to sustain flaming combustion. The fire at this stage is ventilation controlled. If there is no outside intervention, the fire will slowly decay, smoulder and self-extinguish, as shown by the green line.

Point D – F shows a change in the ventilation profile which can occur when Firefighters make an entry into the property to fight the fire. This is because Firefighters often do not close over the door through which they have made entry into the property, to control the inflow of oxygen. At this point the HRR and temperature accelerate rapidly. If air flow into the room isn't controlled or if enough water isn't directed onto the fire or into the room on fire, then the room can transition to flashover in less than a minute.

52. This is an extremely hazardous situation and has resulted in Firefighter injuries and fatalities in the UK and across the world.

53. Science dictates that the high pressure generated by the expansion of gases heated by the fire will move towards the lower pressure at the ventilation opening and that the hot fire gases will move towards the cooler air at the ventilation opening. This can place Firefighters in between the fire and the outlet (exhaust) vent for the fire gases. In the absence of refuge behind a closed door, their only defence in these circumstances is a high flow rate of water directed at the fire.

54. The combination of uncontrolled ventilation and/or the utilisation of ineffective firefighting tactics has been a factor in almost every UK Firefighter fatality occurring within a structure fire in the last 30 years⁵.

55. It may be very difficult, if not impossible, for the first attending Crew or Watch Manager to determine the status of the fire on their arrival. Flaming combustion will be evident with a fuel-controlled fire. A ventilation-controlled fire however is likely to generate large volumes of turbulent smoke which would make it very difficult for the first attending Crew or Watch Manager to determine whether there was fire or heat damage beyond the ROO even if they were undertaking thermal scanning using a Thermal Imaging Camera (TIC).

56. As stated previously international scientific research⁶ shows that any fire involving an item or items which have a sufficient HRR to transition the compartment to flashover, will become ventilation controlled with 2-3 minutes unless there is an unlimited supply of oxygen available.

⁵ Fatal incident reports – Wealmoor Warehouse fire, Atherstone on Stour/ Balmoral bar fire, Edinburgh/Shirley Towers, Southampton/Bethnal Green Road, London et al

⁶ All UL FSRI studies 2010 – present, Brandweeracademie (2014, 2015, 2016, 2018)

57. Typically, this would require the room door to be open and a door to the property or several large windows to be fully open. In North Wales and across the UK, other than on the warmest of days, this is unlikely. Equations 18 and 19 on p.91 -92 within the Swedish publication entitled 'Enclosure fires' written by Lars-Goran Bengtsson reference Thorntons rule and the calculations for required ventilation openings to generate HRRs ($1m \times 1m = 1.5 MW$, $2m \times 1m = 4.5 MW$, $2m \times 1m + 1m \times 1m = 10.5 MW$). Similar calculations are referenced within the 2018 Brandweeracademie publication 'The Renewed View of Firefighting'⁷ at p. 13 (*'Per square metre (m2) surface area of an opening, 1.5–3 MW of heat release rate can be developed'*).

58. That being so, it is possible that many of the fires subject to this analysis were contained in the room of origin at the time the FRS arrived. Some of the fires that extended beyond the room of origin most likely did so because of the actions of Firefighters in re-ventilating the fire prior to the application of sufficient volumes of water, by them not controlling the door by which they entered the property.

59. In the section on incident analysis, I highlight the number of incidents when the first attending Crew or Watch Manager describes smoke issuing from the property rather than flames showing. This would be an indication of an under ventilated fire.

60. In the interests of accuracy, I should highlight the deficiencies within the IRS in this context. Field 8.20 of the IRS asks, 'What was the extent of flame and/or heat damage on arrival?'. A drop-down menu then offers several choices including 'Limited to the room of origin', 'Limited to the floor of origin (not whole building)' right the way through to 'Whole building'. Depending on the position of the fire within a compartment it is possible that there would be heat damage in an adjacent compartment without fire spread, for example a synthetic based material starting to melt. To remove any ambiguity this question might be better phrased 'What was the extent of fire damage on arrival?'.

61. For most incidents, the messages on the incident log made it clear that there was fire and heat damage beyond the ROO. As a due diligence exercise, I reviewed where available fire investigation reports for incidents where it was reported through the IRS that there was fire and heat damage beyond the ROO on the arrival of the FRS.

62. The photographic evidence available to me showing fire progression confirmed that there was substantial fire damage beyond the room of origin. What the photographs also showed was that the initial tactics employed (high pressure hose reels capable of low flow rates on an interior attack) would have exposed Firefighters to unnecessary risk and would have taken longer to suppress the fire than using a low pressure, high flow alternative (therefore resulting in unnecessary damage).

⁷ [20180423-BA-The-Renewed-View-on-Firefighting.pdf \(nipv.nl\)](#)

How the tactics employed by the FRS affect the outcome of the incident

63. Over the 3-year data analysis period there was a total of 1196 domestic dwelling fire incidents across North Wales at which for 139 incidents fire or heat damage was recorded beyond the ROO.

64. Through access to the NWFRS mobilising system I was able to analyse the incident logs of each of the 139 incidents in detail. Through this analysis I established that 42 incidents did not meet the criteria of fire and heat damage beyond the ROO so were discounted from any further analysis leaving a total of 97 incidents.

65. For each incident I recorded the following information:

- The response time of the first attending appliance (taken from time of alert to time in attendance)
- The elapsed time from the time of the first appliance in attendance to the time of the first informative message which stated the operational tactics in use
- The elapsed time from the time of the first appliance in attendance to the time of the second appliance in attendance
- The content of the first informative which stated the operational tactics in use (i.e. 2BA 1HRJ which stands for a 2-person Breathing Apparatus team deployed with a high-pressure hose reel)
- Any significant information from the first caller or first appliance in attendance (i.e. 'Smoke issuing' or 'Well alight')
- Room of origin and property type (i.e. Kitchen, Living Room, Bedroom, Terrace, Semi Detached, Detached)
- Any relevant information from the Stop⁸ message including the extent of overall damage

66. This information allowed me to establish what the initial caller had witnessed and how long it had taken the first fire appliance to arrive from that point. For example, a caller reporting heavy smoke issuing is an indication of a ventilation-controlled fire. Similarly, I could establish what the first attending Crew or Watch Manager had witnessed to give me a sense of the state of the fire at that point and how it might have developed from the time of the first call.

67. The room of origin gives an indication of the fuel loading, and the type of property gives an indication of the likely size of the compartments within the property. As an example, a 3-seater sofa in a living room or a mattress on a king size bed in a bedroom can generate a HRR of 5MW whereas chipboard kitchen units may only generate a HRR of 1.5MW. The intensity of a bedroom or living room fire is therefore likely to be greater than that of a fire in a kitchen.

⁸ A Stop message is sent from the incident ground by the Officer in Charge to confirm that no further FRS resources will be required at the incident.

68. The first informative message gives definitive information on the tactics in use at first intervention which is critical to the subsequent development or otherwise of the incident. The extent of damage, typically stated on the Stop message confirms the amount of overall damage sustained at the dwelling.

69. At the time of this inspection (January/February 2025) the extant FRS National Operational Guidance (NOG) for dwelling fires was contained predominantly within 'Foundation for firefighting', 'Firefighting' and 'Fires in buildings'. 'Foundation for firefighting' and 'Firefighting' were published on 1 October 2024.

70. FRS NOG can best be described as generic risk assessments presented in the form of hazard and control measure statements which are developed by the National Fire Chiefs Council (NFCC) for policy writers within each FRS to use to form the basis of local Standard Operational Procedures (SOPs) or equivalent. NOG also includes a small number of 'Foundation' publications which provide technical information to support Operational Guidance. One such example is 'Foundation for firefighting'.

71. I will address NOG and NWFRS Aide Memoirs in so far as they concern dwelling fires later in this report but for the purposes of this section, I offer the following definitions which are deliberately simplified and assume no knowledge on the part of the reader. These definitions, 'offensive exterior attack' and 'offensive interior attack', are drawn from the Dutch 4 Quadrant Model⁹.

72. Similar terminology has been introduced within 'Firefighting' NOG (proactive exterior fire attack and proactive interior fire attack) but the Dutch 4 Quadrant Model is well established, recognised and long predates the 'Firefighting' operational guidance.

73. A Crew or Watch Manager in charge of the first appliance to arrive at a dwelling fire incident should undertake an initial assessment of the scene to gather hazard information to inform decision making in respect of the control measure tactics they will employ to safely resolve the incident.

74. International research¹⁰ identifies that the most effective control measure tactic to reduce risk to Firefighters and trapped occupants at a dwelling fire is to apply water onto the fire or at least into the room on fire in the shortest possible time. The quickest method to do this is to direct water into the room from outside the structure using either a high-pressure hose reel jet or a low-pressure jet on a straight stream which in NWFRS will be via a 45mm delivery hose (preferably the latter for reasons explained below). For the purposes of this report, I will refer to this control measure tactic as an 'offensive exterior attack'. To be effective it is however reliant on using sufficient flow rate alongside the correct techniques to minimise air entrainment and maximise internal water coverage within the affected room.

⁹ [201411-BA-Quadrant-Model-for-Fighting-Structure-Fires.pdf \(nipv.nl\)](#)

¹⁰ [20170926-BA-The Offensive exterior approach \(nipv.nl\)/All UL FSRI research](#)

75. An offensive interior attack is when Firefighters, typically in 2-person team multiples wearing BA (from here on in referred to as a BA team), enter the affected property to locate and then fight the fire with some form of firefighting media. This can take longer to achieve, even when the location of the fire, and the quickest route to it, is known.

76. This is because Firefighters must progress through heavy smoke, heat and humidity while manoeuvring a high-pressure hose reel or a low pressure 45mm delivery hose, sometimes through several rooms and around numerous obstructions.

77. At this point it is necessary to make a distinction between the capabilities of the high-pressure hose reel versus the low pressure 45mm delivery hose.

78. Every fire appliance in NWFRS carries 2 x high pressure hose reels. They are stowed in lockers on either side of the fire appliance and coiled on a drum for ease of deployment. Each hose reel consists of 3 x 20m lengths of 19mm diameter hose with the final length of hose terminating in a branch (the device that controls the flow of the water discharged out of the end of the hose, usually supplied with a pistol grip and on on/off mechanism known as a bale). They operate at between 25 – 30 bar pressure and can flow up to 110 litres of water per minute (lpm). This is known as the flow rate. The primary advantage of the high-pressure hose reel is that it can be quickly deployed and that it is easier to manoeuvre than a low pressure 45mm delivery hose. A significant disadvantage is that the 110 lpm flow rate is inadequate to effectively suppress a fully developed (post flashover) fire in a room.

Note: Hose reel tubing of 22mm diameter provides almost twice the flow rate of 19mm hose reel tubing and is in use in several UK FRS¹¹. NWFRS are considering the provision of 22mm hose reels on front line appliances

79. Each fire appliance in NWFRS carries up to 4 x 25m lengths of 45mm low pressure delivery hose and up to 6 x 25m of 70mm low pressure delivery hose. At stations with high rise properties on the station ground an additional 2 x 51mm lengths are carried in the Cleveland coil configuration. At one end of the hose is a male coupling and at the other end of the hose is a female coupling. The male coupling on the first length of hose is inserted into an outlet (delivery) on the fire pump and the branch is inserted into the female coupling at the other end of the hose. If more than one 25m length of hose is required, the male coupling on the second length of hose is inserted into the female coupling on the end of the first length of hose and so on until the required total length of hose is reached. The total length of hose is known as a line. In NWFRS there are typically 3 delivery outlets from which to run hose lines on fire appliances.

80. The 70mm low pressure delivery hose is used to supply water from a fire hydrant into the fire appliance water tank to augment the water supply or to initiate a

¹¹ Flow method | Fire Protection Association (thefpa.co.uk)

hose line prior to adding low pressure 45mm delivery hose at the end of the line to be used on an interior attack, as it is easier to manoeuvre than the 70mm variant. Appliance tanks in NWFRS hold 1800 litres of water.

81. A low pressure 45mm delivery hose typically operates at between 3 – 7 bar pressure and can flow up to 685 lpm dependent on the type of branch utilised. The primary advantage of the low pressure 45mm delivery hose is that the flow rate is sufficient to effectively suppress a fully developed (post flashover) fire in a room. It is however more difficult to manoeuvre than a 19mm high pressure hose reel. Hose management can be a physically demanding task which requires regular practice to perform effectively.

82. In some UK FRS fire pumps are equipped with flow meters which allow the pump operator to observe the actual flow they are delivering to the Firefighters through the low-pressure hose line. NWFRS pumps are not currently equipped with flow meters, but this is something that the Service are moving towards providing as it is difficult for a pump operator to accurately estimate flow rates without them.

83. At all 97 incidents at least one high pressure hose reel was utilised. From analysis of the incident logs, it is almost certain that the high-pressure hose reel was the first and subsequent firefighting media deployed, and at all but 11 incidents in an offensive interior attack. As an example, the first informative message at 86 incidents was either 2BA 1HRJ, 4BA 2HRJ or at one incident 6BA 3HRJ which means a BA team of 2 Firefighters equipped with a high-pressure hose reel or 2 or 3 x BA teams of 2 Firefighters each equipped with a high-pressure hose reel. At the remaining 11 incidents there was no reference to BA being in use on the first informative message which strongly indicates the fire was being fought externally.

84. At only one incident was a low pressure 45mm delivery hose stated as being utilised. However, at 85 of the 97 incidents the Crew or Watch Manager providing information for the IRS report stated that there was fire or heat damage beyond the ROO on their arrival which indicates a fully developed (post flashover) fire.

85. On a small number of informative message reference was made to a safety jet. This is a line of low pressure 45mm delivery hose which should be charged with water and of equal length to any hose line (high or low pressure) deployed for the purposes of interior attack. It is intended to be available for use should there be any adverse development with the incident, particularly one that renders the primary attack line inoperable. While the logic for this is sound, it does not negate the need for the primary attack line to be capable of effectively dealing with any fire for which it is deployed.

86. A safety jet deployed outside the dwelling primarily as a back-up will be of no use to BA teams deployed on an interior attack with a high-pressure hose reel in the event of a deterioration of the fire conditions.

87. By the time any subsequent BA team had deployed the safety jet it would be too late to mitigate the effects of rapid-fire development on any BA teams already within the dwelling.

88. There were a small number of incident logs when the first informative message expressly stated that the fire was being fought externally due to the severity of the fire (my assumption). On station visits Firefighters stated to me that they had attacked dwelling fires externally when the fire had vented through a window on their arrival. They did not however have knowledge of the technique by which this control measure tactic should be applied to achieve the maximum cooling effect through water mapping. The analysis of incident logs shows that on the 11 occasions when an exterior attack has been undertaken as an initial tactical option, a high-pressure hose reel (as opposed to a 45mm low pressure hose line with a much higher flow rate) was utilised. This would account for why the tactic would have had limited success and that fire and heat damage would have been subsequently recorded beyond the ROO.

89. I expressly asked Firefighters how they attacked a fire when deployed on an offensive interior attack. The responses varied dependent on the levels of exposure the Firefighters involved had to dwelling fires (mostly them having had very little) so it was not possible for me to form a definitive conclusion around tactics commonly employed.

90. Over the last two decades UK Firefighters have been trained to cool fire gases using pulses of water on a spray setting from a high-pressure hose reel as they progress towards the fire. This will almost certainly be ineffective against a high HRR fire. It can result in Firefighters being subject to excessive thermal insult and unnecessary damage being caused to the property through taking longer to control the fire.

91. Dutch research demonstrates that arching a straight stream of water from a low-pressure high flow delivery hose achieves greater temperature reductions than pulsing with a high-pressure hose reel when advancing towards a fire¹². In addition, it was found to be an easier technique to achieve than pulsing in a spray pattern.

92. A low-pressure delivery hose can also achieve a substantial reach (more than that achievable by a high-pressure hose reel) which places a greater distance between the Firefighters and the fire thus reducing thermal insult.

93. I return to these issues in greater detail further on in this report however one of the Dutch principles set out within the 2018 publication 'The Renewed View of Firefighting' is of relevance here:

'Gas cooling has limitations and is predominantly effective in small spaces (maximally 70 m2 and with a maximum height of 4 metres) (Lambert & Baaij, 2011). It is important to keep the depth of the attack as short as possible and to apply water to the fire as quickly as possible. Extinguishing the fire is the best form of gas cooling'.

¹² [20211207-BA-When-water-goes-up-in-smoke.pdf \(nipv.nl\)](#)

What the data shows for NWFRS

94. To help inform my analysis I created a table for the 3-year data set that captured critical information that described the state of the fire from the perspective of the first arriving Crew or Watch Manager. Despite the exact terminology differing slightly, I was able to determine two distinct groupings.

95. The first was when the property was described as ‘well alight’ or words to that effect. This indicated to me a well-developed post flashover fire that may well have spread beyond the ROO on the arrival of the FRS. This amounted to 71 incidents from the 97 total.

96. The second was where the term ‘smoke issuing’ or words to that effect were used. This indicated to me a ventilation-controlled fire that was unlikely to have spread beyond the ROO on the arrival of the FRS. This amounted to 12 incidents from the 97 total.

Table 5: Incident ground messages describing the state of the fire on arrival at the incident

	020/21	021/22	022/23	Total
Well alight	15	27	29	71
Smoke issuing	8	3	1	12
				83

97. At all 71 incidents when the property was described as well alight a high-pressure hose reel flowing in the best case 110 lpm and almost always on an offensive interior attack was utilised. On the offensive interior attack this has almost certainly exposed Firefighters to peak HRRs well in excess of what a high-pressure hose reel is capable of effectively suppressing.

98. At all 12 incidents when smoke was described as issuing from the property on arrival of the FRS, thus indicating a ventilation-controlled fire contained to the ROO, fire and heat damage beyond the ROO was subsequently recorded as having occurred. This strongly suggests that full room involvement and fire spread has occurred after the deployment of Firefighters on an offensive interior attack using a high-pressure hose reel. It is likely that this has happened through an absence of door control at the point of entry thus causing the fire to become reventilated with the corresponding rapid increase in temperature and HRR that is more difficult to suppress with a high-pressure hose reel capable of a low flow rate. The heightened risk to Firefighters and of additional damage to the property will be self-evident in these circumstances.

99. At 12 incidents the Crew or Watch Manager providing information to Fire Control to complete the IRS report stated that the fire was in the ROO on their arrival but subsequently spread beyond the ROO. At all 12 incidents the first tactic employed was an offensive interior attack using a high-pressure hose reel. At 5 of the incidents

the phrase 'well alight' or words to that effect were used to describe the fire. This strongly suggests that insufficient weight of attack combined with the absence of ventilation control has contributed to the deterioration of the incident following the arrival of the FRS. The heightened risk to Firefighters and of additional damage to the property will again be self-evident in these circumstances.

100. The following text is copied from the 'The Renewed View of Firefighting' and is directly relevant here:

'Research shows that an attack with sufficient cooling capacity in the fire room, or as close to the fire room as is possible, is most effective. So if this can be done, this is the approach to take. As long as the building remains closed, there is still time. Therefore, the adage is: When everything is closed, the fire is at a pause. Creating an opening is to step on the accelerator'.

101. Oxygen will reach the fire far more quickly than Firefighters deployed on an offensive exterior attack if the opening through which they enter isn't controlled. This will cause a ventilation-controlled fire to grow rapidly. The situation is compounded by Firefighters only having an available flow rate of 110 lpm. This is an extremely dangerous combination that can absolutely be avoided.

102. The NWFRS mobilising system functionality includes a filter option to list informative messages in chronological order. On a sizeable number of incidents, the spread of the fire from the first to subsequent informative messages is starkly illustrated (i.e. spreading from ground to first floor or first floor to attic space).

103. Given the weight of evidence available I consider that the control measure tactics employed have on a substantial number of occasions resulted in Firefighters being unnecessarily exposed to a level of hazard that had the potential to cause serious injury or worse and/or that avoidable damage to property has occurred.

104. In the next section of this report, I consider the underlying causes as to why this might be.

Section 2

Operational policy – background

105. Regulation 3 of the Management of Health & Safety at Work Regulations 1999 places a duty on employers to make a suitable and sufficient assessment of the risk to the health and safety of its employees to which they are exposed to while at work. FRS are therefore required to produce risk assessments setting out hazards and control measures for all activities including responding to dwelling fires.

106. The NFCC produces NOG on behalf of the FRS sector across the UK. NOG can best be described as incident specific generic risk assessments presented in the form of hazard and control measure statements which are developed nationally for policy writers within each FRS to use to form the basis of local Operational Risk Assessments (ORAs), SOPPOs or equivalent. This is intended to assist the FRS to meet its duties under Regulation 3 of the Management of Health & Safety at Work Regulations 1999.

107. When NOG was conceived the intention was to replace all previous nationally published FRS guidance (Generic Risk Assessments (GRAs), Fire and Rescue Service Manuals, Dear Chief Officer Letters etc) by consolidating guidance in one place and with a structure that was simple to understand and easy to navigate. The following description is copied directly from the NOG website¹³:

‘Operational Guidance spans a wide range of activity. There is a structure to make sense of it all; it uses the hazards encountered at incidents and the measures used to control or eliminate them. The guidance is structured so that it starts with the elements that affect all incidents, then explores the environments in which fire and rescue services work, and finally the activities that are carried out’.

108. At the time of writing the ‘Foundation for firefighting’, ‘Firefighting’ and ‘Fires in buildings’ is the relevant extant NOG in the context of this inspection. ‘Firefighting’ and ‘Fires in buildings’ fall within the ‘Activity’ section of NOG.

109. The ‘Foundation for firefighting’ and ‘Firefighting’ were published on 1 October 2024 to replace the legacy operational guidance ‘Fires and firefighting’. NWFRS provide a link to the NOG website on Hwb Tân through which any employee with a NWFRS email address can create a NOG account.

110. The content of ‘Fires and firefighting’ was largely based on ‘Fire Service Manual Compartment Fires and Tactical Ventilation’ which was first published in 1997 to replace amongst others the legacy Manual of Firemanship Book 6a ‘Practical Firemanship’ (the legacy Manuals date back many years hence the male gender

¹³ [About Operational Guidance - NFCC](#)

specific terminology). The contents of Book 6a were to an extent still based on the essays of James Braidwood (the founder of what is now the London Fire Brigade and the first CFO to have introduced internal firefighting) written in the 1800s and which strongly advocated tactics such as controlling the flow of oxygen into a structure (anti ventilation) along with applying enough water onto a fire in the shortest possible time (all the control measure tactics advocated through international research and supported by science).

111. 'Compartment Fires and Tactical Ventilation' was strongly influenced by two studies commissioned by the Fire Research Development Group in 1994, and which are referenced in the 'Compartment Fire Behaviour Training' section of the Thematic Review report on Operational Training¹⁴. These reports considered firefighting tactics developed in Sweden and the approach to tactical ventilation utilised in America at the time. The reports recommended both tactical approaches for adoption by the UK FRS. It should be noted that the intent of both reports was to reduce losses to the insurance industry rather than to achieve any improvements to Firefighter safety.

112. The Swedish approach¹⁵ had been developed by Matts Rosander (a fire behaviour training instructor) and Krister Gisselson (a fire engineer) in the late 1970s in response to a spate of Firefighter fatalities at incidents in Sweden. This consisted of a full system inclusive of new equipment, tactics and training facilities.

113. The Rosander and Giselsson system was designed primarily for use in Swedish apartments built from concrete, that were well insulated, with triple glazed windows that could be expected to still be intact when the FRS arrived. Fires in these circumstances will almost certainly be ventilation controlled. Unlike in the UK and in NWFRS, BA teams in Sweden consist of three Firefighters. The third Firefighter, who performs the role of team leader, holds the door closed behind the two remaining Firefighters in the team to prevent the ingress of oxygen into the room on fire, thus limiting the chances of rapid-fire development (smoke curtains were not widely used at this time). Critically, the system was only ever intended for use in small residential compartments with limited fire loads (and therefore HRR potential) when compared to larger commercial or industrial compartments.

114. When creating their system, Rosander and Giselsson spent two years working with a manufacturing company to develop the Fogfighter branch. This became the universally used firefighting branch in Sweden for over 20 years. It was designed to have the optimum droplet size on a spray setting for the purposes of cooling fire gases through pulses of spray as the Firefighters progressed through the structure towards the room on fire. It was (and still is) used with low pressure 38mm delivery hose and can deliver a flow rate of 300 lpm. This cooling of fire gases through the pulsing technique combined with controlling the inflow of oxygen is what in very simplistic

¹⁴ [Thematic Review of operational training within the Welsh Fire and Rescue Services](#)

¹⁵ This description is taken from a comprehensive report into NOG written in 2017 by Lee Johnston, a Station Manager in West Sussex FRS

terms prevents a ventilation-controlled fire developing as rapidly as is seen in Figure 1 in Section 1 of this report.

115. Once the Firefighters close in on the room on fire, they switch from pulses of water in a spray pattern at the branch to cool and dilute fire gases to a straight stream of water to extinguish the fire with the maximum achievable flow rate.

116. In NWFRS (and across much of the UK), the door through which Firefighters enter a property is not routinely controlled to prevent the inflow of oxygen. The implications of this are set out within Section 1 of this report.

117. As has been demonstrated through the analysis of incident data in Section 1, the default firefighting medium in NWFRS is the 19mm high pressure hose reel which is capable of a flow rate of 110 lpm on a straight stream but in practice would deliver far less than 110 lpm when discharging pulses of water using a spray pattern for the purposes of gas cooling and dilution when progressing towards the fire. The pulsing technique, albeit with a 19mm high pressure hose reel as opposed to a low pressure, high flow delivery hose, is the only substantive element of the Rosander and Giselsson system that has been adopted and embedded as a tactic across the UK and within NWFRS.

118. The position is compounded when considering the American approach to ventilation advocated within 'Compartment Fires and Tactical Ventilation', namely 'vent early, vent often' which is the opposite of what the UK FRS had practiced up until 1997 when ventilation overwhelmingly took place only once a fire was extinguished.

119. There are many differences between FRS in the UK and Fire Departments in America. Fire stations in America are typically crewed by an Engine Company and a Ladder Company. Both will typically arrive at an incident at the same time.

120. The Engine Company provide large volumes of water for the purposes of offensive exterior or interior attack through 1 ½, 1 ¾ or 2-inch diameter low pressure delivery hoses (38mm, 45mm or 51mm). In America the domestic water supply is drawn from the fire main (400mm diameter plus) which is the opposite to the position in the UK where fire hydrants are located on domestic water mains (100mm diameter) so there is usually no shortage of water available in urban areas across America.

121. Ladder Company Firefighters have typically utilised their apparatus (the equivalent of an extendable turntable ladder in the UK) to access the roof to cut a vertical outlet (exhaust) vent through which smoke and fire gases exit the structure using natural buoyancy. When coordinated with an offensive interior attack to suppress the fire this is undoubtedly an effective tactic, (notwithstanding the damage to the roof made by creating the vertical vent) and will result in improved conditions for Firefighters and trapped occupants. If, however, water is not applied to the fire at the same time as the fire is ventilated then rapid-fire growth inevitably follows when modern synthetic based building contents are involved leading to a significant deterioration in conditions.

122. This technique may well have been successful in the days when lower HRR building contents would have been involved in fire as the fires may well have been fuel controlled rather than ventilation controlled. There is however very little, if any, margin for error with the typical modern fire loads of today when dealing with a ventilation-controlled fire. As a result of research carried out by Underwriters Laboratories Fire Safety Research Institute (UL FSRI) many US Fire Departments no longer practice this tactic.

123. Vertical ventilation (creating an outlet vent in the roof) is not a tactic which has gained significant traction in the UK. Horizontal ventilation through opening doors or windows is however much easier to achieve. Up until 1997 and the publication of 'Compartment Fires and Tactical Ventilation' UK Firefighters would not routinely ventilate at fires within buildings until the fire had been extinguished. That undoubtedly changed after 1997.

124. 'Compartment Fires and Tactical Ventilation' strongly advocated the advantages of ventilation but was less explicit over the disadvantages and the imperative to simultaneously apply water to the fire at the same time as ventilation is undertaken. To an extent this was reflected in the 'Fires and firefighting' and 'Fires in buildings' NOG although there were/are several explicit references to the effects of uncontrolled ventilation on a fire without concurrent water application within NOG. This has been addressed to an extent in 'Foundation for firefighting' and 'Firefighting'.

125. The following is copied directly from the Executive Summary of the 2017 report authored by Station Manager Lee Johnston of West Sussex FRS entitled 'Firefighting guidance in the UK: A proposal to move to an evidence-based strategy'.

'UK firefighting guidance underwent a complete transformation between 1994 and 1997. Following a programme of research aimed at reducing the financial losses from large fires, UK fire service guidance began advocating an American-style ventilation strategy combined with a Swedish-style suppression strategy.

However – neither strategy was fully implemented; neither was fully suited to the UK fire environment; the two approaches had not been designed to work together; US ventilation theories were not based on scientific evidence and have since been disproved; and both the US and Sweden have moved on in many ways from the strategies that they used in the 1990s, while the UK has not'

126. In my view this is an accurate reflection of the position in the UK and in NWFRS in respect of the control measure tactics typically employed at dwelling fires and why that is.

Operational policy – NWFRS Aide Memoirs

127. Operational guidance within NWFRS is contained within Aide Memoirs accessed through the Technical Operations page on Hwb Tân. There is also a link to the NOG website on the Technical Operations page.

128. Historically NWFRS published SOPPOs which were aligned to the legacy Generic Risk Assessments (GRA) index that was replaced by NOG. SOPPOs have been archived by NWFRS and replaced by Aide Memoirs. Officers explained to me that when NOG was first introduced there was a strong desire within NWFRS for simplification and for the consolidation of guidance from multiple locations into one portal. A NOG product envisaged at the time to assist this process was the 'Service Integration Tool'. It was the view of Officers that this tool, accompanied by updated Aide Memoirs would provide the appropriate operational doctrine and policy that would negate the need to update what was considered a significantly outdated suite of SOPPOs. Effort was invested into updating the operational Aide Memoirs, so that they reflected local and national control measure tactics and so that this information would be available to crews at the incident ground. However, a delay in the introduction of the Service Integration Tool has left a substantial gap for NWFRS. I return to this point in the summary of this section.

129. GRAs were published by the UK Lead Government Department for the FRS which at various times has transitioned between the Office of the Deputy Prime Minister, the Department for Communities and Local Government (and various iterations thereof) and the Home Office. The purpose of GRAs was broadly similar to that of NOG, to provide guidance to FRS policy writers when developing local ORAs, SOPPOs or equivalents.

130. Aide Memoirs are typically included at the front end of an ORA or SOPPO to be accessed via Mobile Data Terminal on route to or when first in attendance at an incident to act as a prompt for the initial Incident Commander on hazards and control measure tactics. They do not usually extend beyond two pages and do not contain the detail that would be found within an ORA or SOPPO.

131. NWFRS have produced the following Aide Memoirs relevant to hazard knowledge and firefighting control measure tactics in domestic dwellings:

- F (7) Fireground hydraulics & flow rates (5 pages)
- F (17) Fires in basements (2 pages)
- F (18) Fires in thatched roofs (2 pages)
- P (5) Positive pressure ventilation (1 page)
- T (1) Timber framed building fires (2 pages)
- T (2) Fires in tall buildings (6 pages)

132. The format of the Aide Memoir is to a greater extent standardised and consists of the following sections:

- Introduction
- Hazard knowledge (or Significant hazards and risks)

- Control measures (under the heading of 'Incident Commanders should')

133. The hazards listed in the Aide Memoir are denoted by a NOG hazard symbol (to indicate a direct lift from NOG). The control measures listed in the Aide Memoir are either denoted by a NOG control measure symbol (to indicate a direct lift from NOG) or an NWFRS badge symbol (to indicate a local control measure).

134. For the purposes of this inspection, I reviewed the following Aide Memoirs as they contain content directly relevant to this analysis:

- F (7) Fireground hydraulics & flow rates
- F (17) Fires in basements
- F (18) Fires in thatched roofs
- P (5) Positive pressure ventilation
- T (2) Fires in tall buildings

NWFRS Aide Memoir content analysis

135. NWFRS does not have a single definitive Policy that sets out its position in respect of firefighting tactics in dwellings or any structure fire. Structural firefighting guidance is instead spread across the Aide Memoirs listed previously. Aide Memoirs for structural firefighting are limited in scope and do not reflect all the hazard and control measure knowledge set out within the 'Firefighting' and 'Fires in buildings' NOG or the 'Foundation for firefighting'.

136. The absence of overarching guidance for structural firefighting, or any substantive ORA for all aspects of fire and rescue operational activity (technical rescue, hazmat etc) is an omission which I believe leaves NWFRS exposed. Following my feedback to this effect to Principal Officers prior to the publication of this report, the Service has taken steps to implement a solution working with South and Mid & West Wales FRS.

137. On every station visit Firefighters recognised that Aide Memoirs were limited in scope and strongly expressed a preference for one single point of reference for firefighting guidance containing sufficient and all-encompassing detail on hazards and control measure tactics. Firefighters did however state that Aide Memoirs were a useful point of reference to act as a prompt on the incident ground.

138. Aide Memoir **F (7) Fireground hydraulics and flow rates** provides guidance to Firefighters on weight of attack which is a critical control measure.

139. The 'Introduction' section contains the following text:

At its simplest, the flow rate is the amount of extinguishing media being applied to a fire at any one time, referred to in litres per minute (L/min).

Required flow rate may be simply viewed as the amount of firefighting media required to control and ultimately extinguish a fire.

This introduces many variables; more precisely two flow rates need to be considered:

- *Critical Flow Rate (CFR): typically this would be the absolute minimum amount of firefighting media flow needed to fully suppress a fire at any given level of involvement*
- *Tactical Flow Rate (TFR): the target flow for a primary attack hose line or lines*

140. This is an abridged version of the text contained within EuroFirefighter, Chapter 12, Adequate 'Firefighting Water' – you need this! (p. 235) authored by the late Paul Grimwood. The actual text from EuroFirefighter is as follows:

Critical flow-rates, below which a developing fire is unlikely to be controlled during the growth or steady state periods. (2.0 L/min/m²)

Minimum flow-rates where suppression is achievable but Firefighters may be exposed to longer duration fires and more punishing conditions. (3.7 L/min/m²)

Optimum (adequate) flow-rates where control of the fire is achievable without unnecessary punishment to Firefighters. (6.0 L/min/m², two dwelling rooms totalling 32m²). 6.5 L/min/m² (commercial building fire 50-100m²)

Note: 'Optimum' means the absolute minimum amount required to extinguish a certain sized fire effectively and safely. A secondary safety (back-up) line of at least equal flows should always be provided in addition, in support.

141. There is a substantial difference between the Paul Grimwood definition of the Critical Flow Rate and that in the Aide Memoir. If the definition of Critical Flow Rate is to remain in the Aide Memoir, then it should reflect the version from EuroFirefighter.

142. The 'Hazard knowledge' section continues with the following:

...The mathematical calculations for the amount of water required to extinguish a given fire are relatively complex. However, as a fire ground rule of thumb, for fires from 50 to 600m² the following calculation could be considered:

Optimum flow rate (L/min) = fire area (m²) x 5

143. Aside from the fact that this is control measure knowledge rather than hazard knowledge it is again is an abridged version of text contained within EuroFirefighter, Chapter 12, Adequate 'Firefighting Water' – you need this! (p. 236/7). The actual text is as follows:

Based on the author's earlier research from 100 fires in London in 1989 and the GCU research described here, a series of rough fire ground rule of thumb guides were developed for UK national operational guidance (NOG) as follows:

- Area of fire (m²) multiplied by 5 (for fires involving between **100-500 m²** of floor area) $A \times 5 = \text{required flowrate (L/min)}$ - ($A = \text{Area of floor in m}^2$)*
- One low flow handheld fire stream (350 L/min) (say 100 galls/min) per 75 m² of floor area fire involvement*

144. **Where the fire area is less than 120m² the fire-ground rule-of-thumb is inadequate** and where fire areas >600m² it begins to estimate very high flow-rates. Therefore, the fire-ground formula $A \times 5$ is only suited for use within the parameters as discussed above. **Where deployment is for a fire area less than 120m², the minimum target flow-rate on any primary attack hose-line should be 200-500 L/min (1 or 2 x 22mm hosereels) on high pressure or 350-500 L/min on low pressure.** (Also, see guidance in chapter 3 – Fire Dynamics).

145. The text highlighted in bold is my emphasis. At no point does the text in the Aide Memoir state the minimum target flow rate on any primary attack line should be 200 – 500 lpm which cannot be achieved with the 19mm hose reel in use within NWFRS.

146. The graph at Appendix 1 shows a minimum flow rate of 200 lpm for residential, hotel, office, shop and other fires but this may not be obvious to the reader. There were no Firefighters, Crew or Watch Managers who were aware of the appendix when I asked the question on station visits.

147. This should be addressed as a priority.

148. The 'Introduction' section of Aide Memoir **F (17) Fires in basements** states the following which is drawn directly from the Hazard Knowledge section of the 'Fires in basements' chapter within the 'Fires in buildings' NOG:

'Fire behaviour in basements is unpredictable and they may behave in a similar way to highly insulated buildings; the highly insulated space may allow for more intense and rapid fire growth'.

This statement in isolation is misleading. A highly insulated space will limit the amount of oxygen available to the fire which will in turn limit fire growth which is the opposite of *'more intense and rapid fire growth'*. It is followed by the sentence copied below:

'There is likely to be a lack of ventilation within the basement, however some ventilation may be provided by means of pavement lights and doors. There is a risk of rapid fire development or backdraught during opening of such vents during firefighting operations'.

149. I can understand why this has been copied directly from NOG, but it is not well worded. It would be much clearer to the reader if it was explained unequivocally why the highly insulated space will limit fire growth i.e. due to the limited availability of oxygen, but when oxygen is introduced then rapid-fire growth will invariably follow if the fire is not suppressed concurrently. An additional sentence which explains that insulation limits external oxygen supply and clearly states that uncontrolled ventilation of the basement will invariably lead to rapid fire growth of a ventilation-controlled fire if concurrent suppression is not undertaken would remove any ambiguity.

150. The following quote from James Braidwood should be the guiding principle in respect of ventilation for any compartment fire, basement or otherwise:

The door should be kept shut while the water is being brought, and the air excluded as much as possible, as the fire burns exactly in proportion to the quantity of air which it receives - James Braidwood, 1866

This highlights the need for an overarching ORA or hazard and risk control statement covering all the generic hazards arising from structure fires including ventilation-controlled fires which may be more likely in, but are certainly not limited to, basements.

151. Page 2 of F (17) contains a list of 6 single sentence considerations for the Incident Commander in respect of control measure tactics for basement fires which is fine for an Aide Memoir but in no way qualifies as suitable and sufficient for a comprehensive ORA.

152. I have included Aide Memoir **F (18) Fires in thatched roofs** in this analysis as there were several incidents in the analysis when fires spread either from rooms within the dwelling to roofs or from the roof into the dwelling.

153. The 'Introduction' section of F (18) states that 'Thatched roofs are designed to repel water making traditional firefighting tactics ineffective'. As obvious as this might be this is still sound guidance. There were several incidents included within the incident analysis in Section 1 which involved roof fires, all of which, from the informative messages, appeared to have been attacked externally using what would be considered 'traditional firefighting tactics'.

154. Page 2 of F (18) contains a list of ten single sentence considerations for the Incident Commander, of which three constitute firefighting control measure tactics:

- *Consider creating a firebreak to prevent fire spread, considering the time to implement*
- *Consider separating burning material from the fire using heavy plant and extinguishing it*
- *Consider requesting or using lances to penetrate thatch – (i.e. Wildfire vehicle, Pinzgauer, Bremach)*

This is entirely suitable for an Aide Memoir but in no way qualifies as suitable and sufficient for a comprehensive ORA.

155. Aide Memoir **P (5) Positive pressure ventilation** consists of a single page and a fourteen-bullet point list which sets out the criteria for using positive pressure ventilation preceded by a statement in red font and capital letters that makes it clear that PPV is to be used in post fire situations only.

156. This is entirely suitable for an Aide Memoir but in no way qualifies as suitable and sufficient for a comprehensive ORA.

157. The 'Introduction' section of **T (2) Fires in tall buildings** states that 'This Aide Memoir is to assist the initial Incident Commander with initial firefighting, command and sectorisation considerations'. It then runs to 6 pages containing numerous bullet points which takes it beyond being a prompt for an initial Incident Commander.

158. In the 'Hazard Knowledge' section ten hazards are listed including the following which are specific to initial firefighting:

- *Failure of compartmentation*
- *Undetected fire spread*
- *Flashover and backdraught*
- *Torch and coandra (sic) effect*

159. There is no further detail provided as to what any of these hazards are and how they might be identified which is fine for an Aide Memoir but not if the necessary underpinning knowledge detail is not available to Firefighters elsewhere.

160. This is followed by an 'Initial Actions' section which details the actions to be undertaken by the first attending appliance commander. This includes the following direction:

*'A fire suppression crew must **NOT** be committed until the safety crew/jet is established'*

This is followed by an Operational Tactics section which lists 23 considerations including the following:

- *Identify the location of the fire, materials involved and any potential for flashover or backdraught*
- *Ensure an adequate water supply based on the flow requirements of multiple jets being used at height*
- *Consider requesting aerial or special appliances to reduce risk, demand on resources or external main if internal mains fail*
- *Continually monitor and assess the fire development for signs/symptoms of escalation*
- *Consider the effect of firefighting tactics/flow path of smoke on evacuation routes*

These are all effective prompts for Incident Commanders which would apply to any structure fire, tall building or otherwise, but they only feature in this one Aide Memoir. The earlier point over absence of underpinning knowledge detail elsewhere refers.

Of concern however is the following bullet point:

- *Use minimum extinguishing media considering the appropriate weight of attack*

161. The appropriate weight of attack will be determined by the tactical flow rate referenced earlier in this section. This bullet point should either be deleted or reworded to make it clear that the appropriate weight of attack should be established through the correct application of the fireground formula.

162. What then follows are 'Further Considerations' in relation to 'Access & egress', 'Tactical Ventilation' (referenced below) and 'Control measures for entrapment' taking the length of the Aide Memoir to 6 pages.

163. Under the heading 'Further Considerations – Tactical Ventilation' 11 considerations are listed which include the following:

- Consider the isolation or containment of the fire compartment
- Put covering jets in place prior to the creation of exhaust vents where possible
- Consider leaving unopened doors closed to prevent the unnecessary spread of smoke and fire gas travel whilst maintaining access, egress and ventilation

164. Isolation or containment of the fire compartment is a valid control measure tactic at any structure fire as is leaving unopened doors closed.

165. At mid to upper floors at a tall building fire, covering jets can only be achieved through deployment of an aerial monitor or a floor below branch which are not currently utilised within NWFRS. This should be made clear within the text.

166. As stated previously these are all effective prompts for Incident Commanders which would apply to any structure fire, tall building or otherwise, but they only feature in this one Aide Memoir. It is a substantive omission that there is no all-encompassing guidance in respect of underpinning hazard or control measure tactic knowledge available to Firefighters elsewhere. I return to this point in the summary section.

Operational policy - summary

167. The purpose of an Aide Memoir is to act as a prompt to Incident Commanders for initial actions to be considered while on route to or when first in attendance at an incident. Aide Memoirs undoubtedly have a place. On station visits Firefighters, Crew and Watch managers all stated that they were a useful point of reference at incidents. They cannot however replace the detail that should be present within ORA or SOPPO hazard and risk control statements covering all aspects of structural firefighting. The delay in the introduction of the 'Service Integration Tool' has left a gap in the NWFRS suite of operational policy documentation which needs to be filled without delay. Without addressing this immediately, the Service will be failing in its duties under Regulation 3 of the Management of Health and Safety at Work Regulations to provide a suitable and sufficient risk assessment of the risk to Firefighters at incidents.

168. I have made this known to NWFRS Principal Officers who have to their credit taken immediate action to engage with South Wales FRS to access and adopt the structural firefighting guidance developed by their Officers in response to Recommendation 2 of the October 2024 South Wales FRS inspection report as an interim measure pending further collaboration on a pan Wales basis.

169. The following is repeated from the South and Mid & West Wales FRS inspection reports.

The National Fire Protection Association (NFPA) 1700 'Guide for structural firefighting' is the American version of the 'Foundation for firefighting, 'Firefighting' and 'Fires and firefighting' and 'Fires in buildings' NOG. The 'Tactical Considerations for Fire Control and Extinguishment' set out in Chapter 10 have been developed from the UL FSRI research undertaken over the last 15 years and referenced heavily in this report.

Chapter 10 is the best example I have seen of a clear and unambiguous articulation of control measure tactics ranging from what would be considered in the Dutch 4 Quadrant Model as a Defensive Exterior Attack, right the way through to an Offensive Interior Attack with an easily understandable explanation of how each is executed in practice. What Chapter 10 also does is to differentiate firefighting attack control measures from tactical ventilation control measures using the distinct headings of 'Water' and 'Air'.

170. The firefighting guidance developed by SWFRS takes this into account and represents an exemplar of good practice. It is undoubtedly a strong foundation for the three Welsh FRS to build a standardised approach to operational guidance across Wales. On every station visit the view was expressed by Firefighters that a single point of reference for firefighting control measure tactics was necessary. The guidance produced by SWFRS would meet that requirement.

171. Accordingly, I make a recommendation to that effect in Section 3 of this report.

Organisational arrangements for the delivery of operational policy

172. Operational Policy is predominantly imparted to Firefighters through their initial and ongoing training. There are three phases to Firefighter training in NWFRS:

Phase 1 Initial Skill Acquisition – Wholetime duty system Firefighters undertake an initial 14-week training course split between the Dolgellau training centre and the Rhyl fire station complex covering all core skills. The RDS Firefighters initial acquisition program is delivered over three modules. Module 1 is a 6-day initial firefighting skills course, Module 2 is a 10-day BA initial course and Module 3 is a 4-day RTC course. The wholetime 14-week initial course and RDS Modules 1 and 2 cover input on hazard knowledge and control measure tactics for fighting fires in dwellings.

Phase 2 Development to Competent - For wholetime and RDS Firefighters' initial skill acquisition training is followed by a 24-month period within which the wholetime Firefighter is expected to move from development to competent to achieve the Skills for Fire & Rescue diploma apprenticeship and the RDS Firefighter to achieve the Skills for Fire & Rescue custom certificate. Wholetime and RDS Firefighters undertake 6 monthly assessments against all core skill areas over a 24-month period.

Phase 3 Maintenance of Competence – NWFRS utilises the pdrPro competency recording system to implement a risk-based approach to competency maintenance training and assessment. The pdrPro system is linked to the Learn Pro Learning Management System which consists of what is a limited number of theoretical training packages on structural firefighting. In the structured interview with the Training and Development Manager it was acknowledged that NWFRS Learn Pro content for structural firefighting fell a long way short of what was required and was in the process of being reviewed. Recruit initial training packages are available through Hwb Tân. This is supplemented by periodic structured skill maintenance training courses delivered by instructors at Dolgellau, Rhyl and at the compartment fire behaviour demonstration unit at Broughton Airbus factory in Flintshire.

173. For the purposes of this inspection, I reviewed the following training packages which apart from Tactical Ventilation packages were accessed through the Operational tab on the Learn Pro home page. The Tactical Ventilation packages were accessed through the Additional Station Learning tab also on the Learn Pro home page.

- Fire behaviour (5.08)
- Tactical ventilation (3.06)
- Tactical ventilation – NOG v2
- Fires in buildings: basements, tunnels, atriums – NOG
- Fighting fires in tall buildings – NOG
- Fireground hydraulics and flow rates

174. I also reviewed the following presentations which I accessed through the Training and Development page on Hwb Tân:

- BA 14 Fire behaviour and compartment fires
- BA 15 CFBT fire attack

NWFRS training package analysis

175. The **Fire behaviour (5.08)** presentation dates to the late 1990s and is based on the content of the legacy 1997 Fire Service Manual 'Compartment Fires and Tactical Ventilation'.

176. It consists of an Aims and a Learning Outcomes slide followed by 6 sections:

- Section 1: Mechanisms of Combustion
- Section 2: Compartment Fires
- Section 3: Key Control Measures
- Section 4: Branch Techniques and Operational Considerations
- Section 5: Firefighting at an Incident
- Section 6: Operational Considerations

177. The presentation concludes with a Summary slide followed by an assessment.

178. The sequence in which information is presented is somewhat disjointed. Section 2: Compartment Fires contains 15 slides, which for the most part describe hazard knowledge. On the slide entitled 'Flashover' there are two links embedded, one for 'Signs and symptoms' and the other for 'Key control measures'. This is not replicated for the 'Backdraught' slide.

179. The 'Key control measures' include:

- *Ensure proper protection...*
- *Stay low*
- *Use spray pulses at ceiling level...*

180. Given the extreme hazard to Firefighters from a flashover there is a need to expressly state what proper protection is. Staying low and using spray pulses at ceiling level will offer next to no protection to Firefighters from the heat flux of a flashover.

181. 'Section 3: Key Control Measures' consists of one slide containing 11 bullet points. There is no differentiation on the slide between the control measures for a flashover, backdraught or a fire gas ignition which are not necessarily all the same.

- *Ensure proper protection*
- *Keep door closed and cover with protective branch*
- *If possible, keep out of the room and ventilate from outside*
- *Ensure escape routes are protected*
- *Cool and ventilate outer compartments*
- *Plan escape route for gases before releasing them*
- *Stay low and to the side of the door*
- *Open the door slightly and direct spray upwards and into the room*
- *Cool the compartment as much as possible*
- *Keep out of the way of steam and hot gases*
- *Only enter room if required*

182. The first key control measure listed is 'Ensure proper protection' but again without any detail as to what this constitutes.

183. There is limited reference to anti ventilation and no reference at all to undertaking an offensive exterior attack both of which would be effective control measure which limited the risk to Firefighters in a potential flashover, backdraught or fire gas ignition scenario.

184. Section 4: Branch Techniques and Operational Considerations runs to six slides. The second slide is entitled 'Extinguishing methods' and states the following:

Extinguishing methods can be grouped under three main headings:

- *Gas Cooling*
- *Indirect*
- *Direct*

This is followed by a slide each setting out 'Purpose', 'Branch' and 'Effect'.

The slide entitled 'Indirect techniques' contains the following under the 'Branch' heading:

- *Medium spray aimed above and around the fire*
- *Branch must be moved around with pulsations to ensure maximum coverage*

185. In this context an 'Indirect attack' can be considered as the same as an offensive exterior (or interior) attack when it may not be possible to direct the water stream at the fire. The technique described is the opposite technique to how an offensive exterior (or interior) attack should be executed. A straight stream (or solid stream if using a smooth bore branch) should be held steady and directed on a steep angle at the ceiling of the affected compartment for minimum air entrainment and maximum water coverage. In an offensive interior attack scenario Firefighters would do the same using the reach of the stream to maximise the distance between them and the fire.

186. Under the 'Effect' heading the following bullet point is included:

- *Lowers neutral plane, reducing vision and worsening conditions*

An effective offensive exterior or interior attack has been shown through research referenced earlier in this report to improve conditions significantly through suppressing the fire. Content such as this serves to perpetuate the belief that flowing higher volumes of water on a straight stream worsens conditions when in fact the opposite is true. It should also be noted that a branch on a spray setting being moved around will entrain significantly more oxygen than a straight stream held steady.

187. 'Section 5: Firefighting at an incident' runs to five slides. The title slide contains the following guidance:

When Firefighters are inside a compartment they should always consider one of the following three options:

- *Maintain position: Protect position using gas cooling.*
- *Move forward: Attack fire gases using gas cooling with short or long pulsations.*
- *Withdraw: If conditions deteriorate, withdraw protecting themselves using gas cooling.*

Firefighters should try to use the minimum amount of water as effectively as possible, ensuring the neutral plane is kept as high as possible, whilst cooling the maximum amount of fire gases...

188. If Firefighters are attempting to fight a fire inside a fire compartment, then they are undertaking an offensive interior attack which places them at greatest risk. At no point is the option of an offensive exterior attack mentioned. Nor is there any explicit guidance over anti ventilation (reducing the amount of oxygen to the fire typically using door control thus limiting the HRR). The only branch technique advanced is gas cooling using pulses which offers the least protection to Firefighters as it flows the least water.

189. The comment that 'Firefighters should use the minimum amount of water as effectively possible' is deeply concerning. In these circumstances Firefighters should use the tactical flow rate required to effectively suppress the fire using the reach of the straight stream to put as much distance between them and the fire.

190. The presentation reflects guidance introduced in 1997 which has since been superseded. It is seriously dated and, in my view, should be withdrawn from Learn Pro.

191. The **Tactical Ventilation 3.06** presentation also dates to the late 1990s and is based on the content of the legacy 1997 Fire Service Manual 'Compartment Fires and Tactical Ventilation'.

It consists of an 'Aims' and 'Learning Outcomes' slides followed by 14 further sections:

- Section 1: What is Ventilation?
- Sections 2: Features of Smoke
- Section 3: Ventilation Types
- Section 4: The Effects of Wind
- Section 5: Assessing the Need for Ventilation
- Section 6: How Ventilation Will Be Achieved
- Section 7: Positive Pressure Ventilation
- Section 8: Considerations Prior to Ventilating
- Section 9: What is Positive Pressure Ventilation?
- Section 10: Incident Command - Initial
- Section 11: Operational Procedures
- Section 12: Sealed Rooms

- Section 13: Venting a dwelling
- Section 14: What to do if PPV does not Work

The presentation concludes with an assessment.

The opening slide contains the following text:

Welcome to the eDevelopment module on Tactical Ventilation Module.

Tactical ventilation is the well planned and controlled ventilation of a building. It dramatically aids Firefighters committed into the risk area, assisting them in dealing with the incident as well as making it far safer by reducing the chances of backdraught.

The content of this module is based upon Operational Risk Assessment 3.6 Fighting Fires using PPV and Fire Service Manual Volume 2 Compartment Fires and Tactical Ventilation.

Further reference should be sought in Service SOPs and Training Manuals

192. As stated previously GRA 3.6 and the Fire Service Manual 'Compartment Fires and Tactical Ventilation' have been superseded by the 'Firefighting' and 'Fires in buildings' NOG.

193. The definition of Tactical Ventilation on this slide does not align with the definition in the **Tactical Ventilation – NOG v2** presentation reviewed below and drawn from the extant 'Firefighting' NOG. It also claims to make the risk area far safer by reducing the chances of backdraught however this cannot be achieved by tactical ventilation alone.

194. 'Section 3: Ventilation Types' runs to four slides.

The slide 'Value of ventilation' has a picture of a fuel-controlled fire in what is most likely an open sided test rig with the following text:

What is the effect ventilation has had on this room?

Try to think about the conditions that can be seen in this vented room and what it would mean for a firefighting crew e.g.

- *Increased visibility*
- *Improved conditions for potential casualties*
- *Rapid discovery of the seat of the fire, quicker application of firefighting media to the seat of the fire*
- *Reduction in compartment temperature*

Assuming the picture is from an open sided test rig, and it is unlikely it can be anything other than that, the ventilation profile in no way reflects a typical room in a dwelling which would almost certainly not be open sided and would have ventilation openings

limited to a door and windows. Venting what would be a ventilation controlled or limited fire in those circumstances without concurrent suppression would almost certainly result in the complete opposite outcome to that listed above. As an aside the same picture is used on the **BA 14 Fire behaviour and compartment fires** presentation reviewed below to demonstrate a flashover.

195. The following slide is titled 'Value of ventilation 2'. It contains the following text:

As long as ventilation is carried out safely and effectively there are enormous benefits for firefighting crews and occupants.

However, great care must be exercised when employing tactical ventilation as a firefighting technique. This is because incorrect or random opening up of structures to facilitate ventilation could lead to uncontrolled fire spread!!

There is no reference to the need for concurrent suppression with the appropriate weight of attack, which is how the hazard of uncontrolled fire spread is mitigated, on this or any other slide throughout the presentation.

196. The final slide in this section is entitled 'When to use ventilation'. It contains the following guidance:

...In the majority of instances, tactical ventilation should not be used until the fire has been located and, in all cases, an assessment must be made of the likely effects of ventilation...

Ventilating without knowing where the fire is will almost certainly result in rapid fire growth. This should be explicitly stated after the sentence above so there is no doubt as to what the likely effect will be.

'Section 7: Positive Pressure Ventilation' consists of five slides. The slide entitled 'Definition of ventilation' contains the following text:

As you should have learnt in the first half of this module, the text book definition of ventilation is:

"The systematic removal of heated air, smoke or other airborne contaminants from a structure, and their replacement with a supply of fresh air."

This conflicts with the definition provided on the opening slide in the presentation and with the most current definition contained within the extant 'Firefighting' NOG copied below:

Ventilation can be defined as the removal of heated air and products of combustion, which are replaced with a supply of cooler, cleaner air.

197. The next slide 'When to use positive pressure ventilation PPV' clearly states the following:

In order to avoid dangerous conditions level 1 Positive Pressure Ventilation must only be used when the FIRE IS TOTALLY EXTINGUISHED.

This is consistent with NWFRS policy set out within Aide Memoir **P (5) Positive pressure ventilation** which is reassuring despite much of the presentation content being significantly dated.

198. The slide titled 'Significant hazards and risks of PPV' contains the following guidance:

The most significant risk when using PPV is the likelihood that either the occupants or Fire Service Personnel within the building involved may become trapped between the fire and the outlet vent.

Internal conditions can worsen as follows:

- *The tactics involved in using PPV should not be initiated until it is certain the fire has been extinguished and an outlet vent has been created*
- *Ineffective use of PPV is likely to result in increased intensity of a fire thereby causing serious danger to persons within the structure*

This is sound guidance which applies to ventilation in general.

199. The remaining sections in the presentation are specific to post fire use of PPV and therefore remain relevant in the context of NWFRS policy.

200. Considering the observations of concern relating to this presentation there is still some relevant content that NWFRS may wish to retain. I will return to this point after reviewing **Tactical Ventilation – NOG v2**.

Tactical Ventilation – NOG v2 consists of four sections:

1. Introduction (6 slides)
2. Natural Ventilation
3. Forced Ventilation
4. Assessment

201. The first slide titled 'Introduction – What is ventilation?' contains the following definition:

*In simple terms ventilation can be **defined** as:*

'The removal of heated air, smoke or other airborne contaminants from a structure or other location and their replacement with a supply of cooler, cleaner air'.

This differs slightly from the version in the extant Firefighting NOG which was published in October 2024 and instead dates to the legacy 'Fires and firefighting' NOG.

While the difference is not substantive it does however highlight the need to update training materials when guidance is updated.

202. The second slide titled 'Introduction – What is tactical ventilation?' contains the following:

As part of an overall firefighting strategy, incident commanders should always have a clear and informed objective before commencing any form of ventilation activity. This will ensure that the full range of benefits of ventilating can be realised including:

- *Improving conditions for the survivability of building occupants*
- *Improving conditions for Firefighters to enter and search*
- *Reducing the potential for rapid fire development.*

It does not explicitly state anywhere in the presentation how these benefits will be achieved. For the first two bullet points to be achieved concurrent fire suppression will invariably be required. For the last bullet point to be achieved anti ventilation will invariably need to be employed (i.e. closing doors and windows to shut down the flow of oxygen to the fire).

There would be much merit in including a simple explanation to that effect.

203. The third slide titled 'Introduction – When can tactical ventilation be applied?' contains the following example:

After control but before extinction

Example: A BA team are downstairs in control of the fire compartment (one seat of fire only) they do not want to necessarily extinguish the fire due to the excessive amounts of steam this may create within the building they have communicated that the fire is under control. A second BA team are searching on the first floor venting smoke filled rooms as they progress with their search for casualties.

UL FSRI research disproves any concerns over excessive steam through fire suppression¹⁶. In this example it might be better to state that the downstairs BA team isolate the compartment by closing the door which would be an act of tactical ventilation in of itself (isolation).

204. The fourth slide in the Introduction section is titled 'Introduction – flow paths' and contains the following text:

¹⁶ [Study of the Impact of Fire Attack Utilizing Interior and Exterior Streams on Firefighter Safety and Occupant Survival | UL's FSRI – Fire Safety Research Institute](#)

In a building that has an unobstructed flow path from the inlet to the fire compartment, cooler, denser air will be entrained towards the fire area allowing movement of heat and smoke (high pressure) to all other areas of lower pressure.

If an under ventilated fire is suspected and entry has to be made, crews should be aware that by gaining access and progressing towards the fire compartment they may introduce oxygen into the structure, the movement of denser cooler air being entrained will create a natural flow path and may assist in bringing fuel rich flammable gases back into their flammable range as well as increasing the intensity of the fire's development.

Where possible crews should use anti-ventilation tactics and take control of the flow path to ensure the amount of oxygen available to the fire is minimised.

Crews should try and stay out of any flow path, in particular between the fire and any potential exhaust vent, this includes any windows that may not have already failed.

205. The first two paragraphs are essential hazard knowledge. The third paragraph is the first occasion anti ventilation, a substantial control measure tactic, is mentioned in the presentation. The fourth paragraph should be reworded to state that crews should **never** (my emphasis) position themselves between the fire and potential exhaust vent. There would be much merit in having the flow path slide at the front end of the presentation to give context to the following slides.

206. The fifth slide 'Introduction – Locating the fire' lists three considerations, the second of which is copied below:

In the majority of incidents, ventilation should only be used when a fire has been located and an assessment of the likely impact of ventilation has been taken into account. However, in circumstances where the location of the seat of fire is difficult for crews to establish, tactical ventilation may be used to clear adjacent compartments, corridors or staircases etc. to assist Firefighters in identifying the seat of fire, maintaining safe access and egress routes to and from a risk area and also mitigating or reducing the potential for phenomena such as fire gas ignition.

207. I appreciate the difficulties in wording this guidance to make it absolutely clear for the reader what is intended. To remove any ambiguity there may be merit in rewording the second sentence as follows (text in bold is my emphasis);

*...tactical ventilation may be used to clear and isolate compartments, corridors or staircases etc **confirmed to be not involved in fire**...*

208. The 'Natural Ventilation' section contains four slides which explain 'Natural', 'Offensive', 'Defensive' and 'Sequential' Ventilation respectively.

209. The 'Forced Ventilation' section contains eight slides which explain forced ventilation, methods of forced ventilation, when PPV can be used (with the clear direction that NWFRS policy is post fire suppression only), information gathering and preplanning, PPV techniques for single doors, larger openings, sealed rooms and sealed rooms within a compartment. This is followed by five appendixes and an assessment.

210. As stated previously despite the presentation being dated there is some relevant content within **Tactical Ventilation 3.06**. There would be merit in including the content of relevance highlighted earlier, within **Tactical Ventilation – NOG v2** in order to archive the former leaving a single point of reference for the subject matter.

211. **Fires in buildings: basements, tunnels, atriums – NOG** consists of an introduction page, nine content sections followed by knowledge check questions and an assessment. This includes sections covering cellular layouts, open plan layouts, mezzanines, heritage buildings and auditoriums. For the purposes of this analysis my focus was on the basements content due to the relevance to dwelling fires.

212. The first slide in the Basements section titled 'Basements' contains the following text:

'Fire behaviour in basements is unpredictable and they may behave in a similar way to highly insulated buildings; the highly insulated space may allow for more intense a rapid fire growth'.

'There is likely to be a lack of ventilation within the basement, however some ventilation may be provided by means of pavement lights and doors. There is a risk of rapid fire development or backdraught during opening of such vents during firefighting operations'.

This replicates the 'Introduction' section of Aide Memoir **F (17) Fires in basements** drawn directly from the Hazard Knowledge section of the 'Fires in basements' chapter within the 'Fires in buildings' NOG:

213. The comments I make earlier under the guidance review heading apply equally here. I can understand why this has been copied directly from NOG, but the content is not well worded. It would be much clearer to the reader if it was explained unequivocally why the highly insulated space will prevent rapid fire growth due to the limited availability of oxygen but when oxygen is introduced then rapid-fire growth will invariably follow if the fire is not suppressed concurrently. An additional sentence which explains that insulation limits external oxygen supply and clearly states that uncontrolled ventilation of the basement will invariably lead to rapid fire growth of a ventilation-controlled fire if concurrent suppression is not undertaken would remove any ambiguity.

214. The second slide titled 'Shallow basements' contains the following bullet point under the heading 'Inherent hazards'

- *Basements are highly insulated spaces allowing the possibility for more rapid-fire growth*

215. The comments directly above refer. This same bullet point is replicated on the next slide titled 'Deep basements'.

216. On the 'Basements – Control measure – Appropriate intervention' slide the following bullet point is listed under the 'Tactical Actions' heading:

- *Use basement firefighting techniques according to service procedures and training*

217. There is no guidance in any Aide Memoir or training package I reviewed that set out what basement firefighting techniques are in NWFRS.

218. On the same page there is a Procedural Alert PA 017 2020 titled 'Initial means of attack at operational incidents'.

219. The 'Introduction' section of PA 017 2020 states the following:

A Service wide trend has been identified by the Operational Learning Forum (OLF) as part of the Operational Assurance process. Incident Commanders of the initial attending appliance are defaulting to the use of a Hose Reel Jet as a first means of attack on all occasions. The purpose of this Procedural Alert is to ensure that Incident Commanders consider and deploy the appropriate weight of attack at the initial stages of an incident based on good situational awareness and a sufficient Dynamic Risk Assessment (DRA).

220. Under the 'Narrative' heading the following guidance is provided;

*Situational awareness represents the perception and understanding an IC has of an incident, including its hazards, risks and operational activities. It also consists of how an IC anticipates the incident will develop taking into account their actions. Good situational awareness is fundamental to being able to make good decisions. **For the majority of operational incidents attended by NWFRS the use of a HRJ would be deemed as an appropriate first means of attack i.e. when attending an average sized domestic dwelling. However, when attending a well-developed fire at i.e. a large industrial unit, it may be necessary to deploy a greater weight of attack at the initial stages, such as 45/70mm hose lines.** A DRA of this nature will result in a more effective response and ensure the safety of the crews in the immediate risk area. To accurately perceive a situation an IC should always accurately gather and understand information to enable them to anticipate how an incident may develop and what the impact of an intervention may be on its development...*

221. This is not directly specific to incidents in basements however it is relevant at any compartment fire in respect of appropriate weight of attack. The reference to a HRJ being deemed appropriate at an average sized dwelling directly contradicts

research evidence set out in the graph at Appendix 1 contained within Aide Memoir **F (7) Fireground hydraulics and flow rates** which demonstrates that a minimum flow rate of 200 lpm is required to suppress a typical fire in a domestic dwelling. This flow cannot be achieved with the 19mm HRJ in use within NWFRS.

222. The **Fighting fires in tall buildings – NOG** presentation consists of an introduction section, three content sections on 'Stay put/evacuation procedures', 'Complex Fire Engineering (Fixed Installations)' and 'Fighting Fire' followed by knowledge check questions and an assessment.

223. The slide titled 'Fire Mains' within the 'Complex Fire Engineering – Fixed Installations section' contains a simple description of a fire main (dry or wet riser) and how they operate. The slide also contains a 'Hazard' section with the following points listed:

Landing valves vandalised or left open can cause severe water damage and a reduction in pressure and flow to the fire floor

Possibility of over running water supply

Pressure at the branch will be reduced as height increases.

Where a single rising main is being used to supply multiple jets, opening branches will reduce the working pressure of other jets.

If fire mains fail, seek other alternatives, such as;

- *Utilising Aerial Ladder Platform as a rising main*
- *Hauling hose aloft*

224. I highlight this as I consider it to be an example of good training material content that is of real value to Firefighters. On previous inspections I have highlighted how in guidance and training materials rising mains have been listed as a hazard. I observed that the fire mains themselves are not a hazard; to the contrary they support the deployment of effective control measures. The point I then made is that failure of the fire mains or any limitations arising from the use of fire mains is the hazard. These hazards are succinctly captured in the list above.

225. Similarly on the following slide titled 'Hose reels' a simple description of where they might be provided, and their purpose is followed by the bullet point below under the 'Hazard' heading:

Hose reels will not provide sufficient flow or pressure to deal with a well-developed compartment fire

226. On the slide titled 'Ventilation Systems' there is a Procedural Alert embedded which highlights an incident that occurred in West Yorkshire where fire spread from the third to the sixth floor of a seven-story block of flats because of a fault on the Automatic Open Vent system. This is another example of good training material

content through providing a real-world example of the hazards associated with such systems.

227. The final slide in the Complex Fire Engineering (Fixed Installations) section is titled 'Contingency Arrangements'. It contains the following text:

As the failure of fixed installations can have serious consequences, suitable contingency plans should be developed. These plans should determine good practice and alternative actions in the event of failure or inappropriate operation.

Contingency arrangements may include:

...The use of aerial appliances to provide a temporary fire main

...Using hose lines as temporary rising mains

...Providing external firefighting equipment to surround the fire

Again, this is concise relevant control measure knowledge that is of value to Firefighters.

228. The 'Fighting Fires' section consists of one slide from which cue cards can be accessed. The introductory text is as follows:

Fighting fires in 'Tall Buildings' requires some additional control measures and specific equipment and techniques. The following 'cue cards' will detail some of these.

- *Psychological stress*
- *Internal navigation and search*
- *Limited space*
- *Tall building equipment pack*
- *Cleveland coil*
- *Cables*
- *Cable cutters*
- *People*

229. The list does include specific equipment (Tall building equipment pack, Cleveland coil, cable cutters) but there are no additional control measure tactics referenced. Acknowledging that at the time of writing NWFRS appliances do not carry floor below branches for offensive exterior attack or smoke curtains for ventilation control and stairwell protection these control measure tactics (which can be deployed at any structure fire but might be considered to be tall building specific) can still be achieved by other means (i.e. through aerial monitors and manual door control).

230. If this omission were to be addressed, then this would be a very good training package. I will consider the issue of training package development, maintenance and review in the summary section below.

231. The **Fireground hydraulics and flow rates** presentation consists of seven content slides followed by a slide which sets out further reading material.

232. Slide 2 describes 'Critical Flow Rate' however it repeats the NOG definition contained within Aide Memoir **F (7) Fireground hydraulics and flow rates** rather than the definition from EuroFirefighter. My earlier comments on this refer.

233. Slide 3 describes 'Tactical Flow Rate'. This slide includes a graph taken from NOG titled 'Modern Fire Development'. Despite it being entirely accurate it is not clear as to why it is included.

234. Slide 3 is titled 'The Concept' and provides an explanation of how flow rates can be determined either by estimating HRR or by use of the fireground formula.

235. Slide 4 is titled 'Mathematical Calculations' and sets out the fireground formula to determine the tactical flow rate (referred to as Optimum flow rate):

236. However, as a fire ground rule of thumb for fires from 50 to 600m², the following calculation could be considered:

$$\text{Optimum flow rate (L/min)} = \text{fire area (m}^2\text{)} \times 5$$

237. As highlighted previously when reviewing the content of Aide Memoir **F (7) Fireground hydraulics and flow rates** I made the point that the fireground calculation produces inadequate flow estimates when the surface area is less than 120m² as explained within the text from the EuroFirefighter publication authored by Paul Grimwood:

'Where deployment is for a fire area less than 120m², the minimum target flow-rate on any primary attack hose-line should be 200-500 L/min (1 or 2 x 22mm hosereels) on high pressure or 350-500 L/min on low pressure'.

238. The slide should be updated to reflect the above and state unequivocally that a 45mm line is the minimum control measure tactic for a confirmed dwelling fire.

239. The **BA 14 Fire behaviour and compartment fires** presentation is delivered on initial training for wholtime and RDS Firefighters but is available on Hwb Tân for the purposes of on station skill maintenance training.

240. The presentation consists of 40 slides. The aim of the presentation is 'to provide students with an appreciation of the inherent dangers of compartment fires, specifically: Flashover and Backdraught conditions'.

241. The objectives of the presentation are that by the end of the session the student will be able to:

- *Describe the basic mechanism of combustion*
- *Describe the characteristics of a compartment fire*
- *Identify the behaviour of fires in compartments*

- *Describe the signs and symptoms of flashover and backdraught*

242. In hazard and risk control terms the aims and objectives of the session are to give the student the necessary underpinning hazard knowledge relating to compartment fires. These are entirely appropriate aims and objectives, and it is undoubtedly sensible to sequence hazard knowledge input prior to control measure knowledge input on initial training.

243. There are no notes included with the slides that would give an indication to the additional detail the instructor might provide. The slide content largely replicates that found within the now archived 'Fires and firefighting' NOG, much of which is now available in the 'Foundation for firefighting' guidance published in October 2024.

244. Slides 25 and 26 at the end of the section of the presentation covering flashover have embedded videos which cannot be accessed via Hwb Tân which means Firefighters on station cannot view the videos. I was not able to view the videos either so I cannot be certain of the content but the video on Slide 26 was from the National Institute of Science and Technology which have published several excellent studies relating to flashover so the content would undoubtedly be highly valuable to Firefighters on initial or skill maintenance training. I would argue that flashover is the most significant hazard to Firefighters fighting compartment fires so the unavailability of the videos should be addressed as a priority. I raised this with instructors during the focus group meeting. They were aware of this which was an obvious cause of frustration to them. I return to the issues raised by instructors during the focus group further on in this section.

245. The same is also true for the videos embedded at Slides 32 and 33 in the 'Backdraught' section and Slides 36 – 39 in the 'Fire Gas Ignition' section.

246. An obvious omission from the presentation is input on HRR from modern building contents and the impact on the ventilation profile along with the issue of ventilation itself. This was acknowledged by the instructors who expressed a real desire to develop their own subject knowledge to enhance the quality of the training they were delivering.

247. The **BA 15 CFBT fire attack** presentation is also delivered on initial training for wholetime and RDS Firefighters but is available on Hwb Tân for the purposes of on station skill maintenance training.

248. The presentation consists of 30 slides. The aim of the presentation is 'to provide students with an appreciation of the inherent dangers of compartment fires and the procedures and extinguishing techniques to safely deal with potential backdraught and flashover conditions when attending incidents'. The objectives of the presentation are that by the end of the session the student will be able to:

- *Identify the behaviour of fire in compartments*
- *Identify the main differences between a flashover and a backdraught*
- *Describe the actions to be taken if a flashover is suspected*
- *Describe the actions to be taken if a backdraught is suspected*

- *Understand and recognise the importance of applying correct door and branch techniques*

249. The first 14 slides provide a recap of the content within the BA 14 Fire behaviour and compartment fires presentation.

250. Slides 15 - 17 considers hose reel branch techniques and specifically wide or narrow cones (spray patterns). This is of concern on two levels. Firstly, I would expect to see input on tactical flow rates and all fire attack techniques as opposed to just gas cooling, as primary control measure tactics immediately following the hazard recap. There is no reference at all throughout the presentation to tactical flow rates which is a serious omission. Secondly, only showing a hose reel and how to switch between wide and narrow spray patterns serves to perpetuate what the analysis in this report demonstrates which is a default to a hose reel at every dwelling fire irrespective of potential peak HRR and required flow.

251. This is further compounded on the next slide entitled '3 Phase Gas Cooling'. The extant Firefighting NOG advocates 4 tactical approaches which are effectively the Dutch 4 Quadrant Model referenced earlier in this report. '3 Phase Gas Cooling' sits within the final quadrant of offensive interior attack, which presents the greatest risk to Firefighters.

252. The full content of the slide is as follows:

- *Phase 1 – cooling prior to entry (door procedure)*
- *Phase 2 – entry and attack (gas cooling/indirect attack)*
- *Phase 3 – extinction and hot spots (direct attack) pencilling and painting*

253. Slide 19 'Door procedure' contains no text or illustration. In the absence of the notes accompanying the slide my assumption is that the instructors would give a practical demonstration of door procedures at this juncture in the presentation.

254. Slide 20 'Phase 2 – indirect attack consists of a picture of a BA team on the left-hand side of the slide applying a pulse of spray into smoke above what appears to be bookshelves in a library with a relatively small fuel-controlled fire on the right-hand side of the slide.

255. Technically this technique represents a form of indirect attack although the picture could equally be interpreted as simply gas cooling. In any event all the research referenced in this report shows that the most effective technique for an indirect attack is to direct a high flow straight stream on a steep angle at the ceiling to achieve minimum air entrainment and maximum water coverage.

256. This technique should be included under the indirect attack heading along with an explanation that it can be employed on an exterior or an interior attack.

257. Slide 21 'Branch techniques/water application' contains the following text:

Branch techniques and water application “is a balance between enough water to control the fire without lowering the neutral plane, thereby protecting Firefighters from rising temperatures and steam, and helping to maintain vision”

258. The assertion that attacking a fire with a high flow of water will cause temperatures to rise is factually and scientifically incorrect as demonstrated through the research referenced within this report. The complete opposite will happen. While vision may be momentarily obscured ventilation can be safely commenced immediately on suppression. The quality and effectiveness of modern PPE, if worn correctly, is such that firefighters would be unlikely to suffer steam burns in any event.

259. Slides 22 and 23 are both titled ‘Water Application’. Slide 22 states the following:

“Water when heated creates steam at a ratio of 1700:1, 1.7 cubic meters of steam for every litre of water, this ratio further increases to 3400:1 when heated past 250 degrees C

The contraction ratio of hot fire gases are greater than this expansion, meaning that when applied in moderation water will reduce the volume of the neutral plane”

260. Slide 23 includes the following bullet points:

- Water applied into the gas layer, in moderation, will reduce the volume of fire gases improving conditions for casualties and Firefighters
- 3 phase approach is most effective

261. Research referenced in this report demonstrates that flowing high volumes of water on a straight stream at a steep angle into the fire compartment (indirect attack) or directly at the fire (direct attack) delivers significant reductions in temperature which ultimately is what improves conditions for Firefighters and casualties alike¹⁷.

262. The target audience for this presentation is recruit Firefighters. These slides advocate minimum water use with no consideration of any form of ventilation control. The 3-phase approach is the least effective against a ventilation-controlled fire with the potential to quickly transition the compartment to flashover once ventilated and one which places Firefighters, casualties and the property at most risk.

263. This is further compounded on Slide 24 titled ‘Phase 3 - Painting’. The slide consists of a picture of a BA team directing a pulse of water with the bale of the branch partially open onto a small fuel-controlled fire on the floor in the same library depicted in Slide 20 along with the following text:

Minimal amounts of water should be applied up close and direct

¹⁷ Study of the Impact of Fire Attack Utilizing Interior and Exterior Streams on Firefighter Safety and Occupant Survival | UL's FSRI – Fire Safety Research Institute

This may be effective for a small fuel-controlled fire. It almost certainly will not be for high HRR potential pre or post flashover fire. The amount of water applied should be that estimated as sufficient to extinguish the fire established through the fireground formula or estimation of HRR.

264. Slides 25 – 29, all titled 'Operational Considerations' reiterate the 3-phase approach described above.

265. The aim of the presentation is *'to provide students with an appreciation of the inherent dangers of compartment fires and the procedures and extinguishing techniques to safely deal with potential backdraught and flashover conditions when attending incidents'*.

266. There is nothing in the content of the presentation that would give me confidence that this aim would be met.

267. The tactics advanced within the 3-phase approach reflect the partial adoption of the Rosander and Gisselson method described in the Operational Policy section. Slides 15 and onwards should be deleted and replaced with the control measure tactics that feature in whatever all-encompassing operational guidance for structure fires is introduced by NWFRS to address the current gap described previously in this report.

268. In my view these control measure tactics should replicate the Tactical Considerations outlined within Chapter 10 of NFPA 1700 Guide to structural firefighting. I return to this point in the summary section below.

Issues raised on previous Thematic Review inspections

269. The 3 previous Thematic Reviews I have undertaken have raised issues which are relevant to this inspection and to the organisational arrangements through which operational policy is delivered.

270. Recommendation 4 of the Learning the lessons from Grenfell Thematic Review¹⁸ (copied below) concerned tactical flow rates as I had noted the default to high pressure hose reels at incidents during this inspection.

271. Recommendation 4 – that input on tactical flow rates for firefighting attack and fire ground calculations be included on the syllabus for Breathing Apparatus and Compartment Fire Behaviour initial and refresher courses. This should be supplemented by an online training module for skill maintenance within the station work routine.

272. Aide Memoir **(F 7) Fireground hydraulics and flow rates** and the training package of the same name contain input on flow rates but as previously identified they do not accurately reflect the findings of the Paul Grimwood Glasgow Caledonian University research. Procedural Alert PA 017 2020 'Initial means of attack at operational incidents' issued around the same time as the Thematic Review inspection fieldwork contains contradictory guidance as explained previously.

273. Recommendation 5 was concerned with the FRS establishing a robust method by which to ensure the recommendations of the Thematic Review were embedded. The text of the recommendation is copied below:

274. Recommendation 5 - Should the 3 FRS be minded to accept the recommendations contained within this report the Operational Assurance criteria in use within each of the FRS should be amended to capture specific evidence in relation to the recommendations in order to demonstrate they are being applied on the incident ground. Alternatively, the 3 FRS could utilise a Thematic Assurance process to target the issues identified within this report.

275. The Learning the lessons from Grenfell Thematic Review report was issued on 25 February 2021. The incident data analysed in this report covers the periods 1 April 2020 – 31 March 2023 and includes over 2 full years after this recommendation was made. There is no evidence from the analysis to suggest the default position of using a high-pressure hose reel (the tactical option offering the lowest flow rate and therefore lowest level of protection to Firefighters) has in anyway shifted in NWFRS despite this or the issuing of Procedural Alert PA 017 2020. I consider the effectiveness of the NWFRS operational assurance process further on in this report.

¹⁸ [Chief Fire and Rescue Adviser thematic review: learning from Grenfell Tower Inquiry recommendations | GOV.WALES](https://www.gov.wales/government/department-of-fire-and-rescue-wales/thematic-review-into-the-grenfell-tower-fire)

276. In the Broadening of the role of Firefighters Thematic Review¹⁹ report published in December 2021 I raised a concern that the current shift system, dating back to the 1970s, does not allow sufficient time for training, exercising and risk reduction activities.

277. NWFRS have recently formalised a station work routine for the shift system however this has not released any of the capacity identified within the Review from the night shift rest periods which accounts for 14 hours of the available 48 hours worked across the 8-day reference period (29.1%).

278. Any interruption to this rest period, which is reasonably foreseeable from emergency calls, increases the risk of excessive fatigue for Firefighters and for which there is no control measure. This is a failure on behalf of the Service to meet its legal duties under Regulation 3 of the Management of Health & Safety at Work Regulations.

279. This is a serious cause for concern, not least because of the issues identified through this inspection which can only be addressed through substantial increases in training and should not be undertaken at the expense of risk reduction activity. Firefighter safety must be the overriding priority for the Service.

280. In the Operational Training Thematic Review report published in October 2022 I raised several concerns which remain directly relevant to the issues highlighted throughout this inspection.

281. The first was that none of the Welsh FRS know definitively the amount of time that should be allocated within station work routines to skill maintenance training.

282. In response to Recommendations 2a and 2b NWFRS undertook a review of time allocated to training (NWFRS Operational Core Skills Review), the outcomes of which were shared with me in February 2024. I wrote to NWFRS on 6 March 2024 with two substantive observations on the review methodology.

283. The review allocated timings to each objective for the relevant core skill area as they are presented within the National Occupational Standards (NOS). The NOS objective descriptions can be broad and encompass several control measure tactics or techniques. The NOS also fail to capture the full range of tactical options available to the FRS. As an example, at no point in the NOS are tactics for offensive interior or exterior attack explicitly (or otherwise) referenced.

284. My recommendation at the time was that NWFRS should undertake the analysis against the full range of control measure tactics and techniques for each incident type which should be set out within NWFRS operational guidance. As has been identified already in this report no all-encompassing guidance for structural firefighting currently exists within NWFRS. Until this is rectified it is not possible for the Service to meet this recommendation. Recommendation 2 of the M&WWFRS

¹⁹ [Fire and rescue service capacity: thematic review | GOV.WALES](#)

inspection report published in January 2025 states that all-encompassing structural firefighting guidance should be developed on a pan Wales basis to avoid unnecessary duplication of effort across the 3 Welsh FRS.

285. The time allocations for many of the objectives contained within the NWFRS analysis were for one individual only whereas a crew on a fire station will consist of at least four and possibly five Firefighters. In practical terms therefore a multiplication factor of 4/5 (or 2 in the example of say a BA team related control measure tactic or technique) should be applied to these time values. As an example, BA Core Skill Matrix, Objective 14, gas cooling techniques has a time value allocation of one hour over the course of a year. Aside from the fact that gas cooling is the only tactical option to feature on the matrix a multiplication factor of 4/5 (depending on default appliance staffing assumption) should be applied as all 4/5 members of the crew would need to independently practice and then demonstrate competence in this technique. I recognise that combination drills and scenarios allow for simultaneous activity which can reduce the overall time as suggested within the review report. This however needs to be offset by the point I make above, notwithstanding the reality that it is much more difficult for an assessor to determine competence having been demonstrated when observing simultaneous activity.

286. My recommendation at the time was that NWFRS produce training videos of each control measure tactic or technique which in addition to being an excellent training aid, can be measured to give a definitive time value from which to determine an accurate time allocation. This time value would include the crew viewing the video, each crew member undertaking practice on the control measure tactic or technique and then being assessed individually. Recommendation 3 of the M&WWFRS inspection report published in January 2025 states that structural firefighting training packages should be developed on a pan Wales basis to avoid unnecessary duplication of effort across the 3 Welsh FRS.

287. Recommendations 5 and 6 are directly relevant to the substantive issues raised throughout this inspection.

288. I make the point within the Operational Training Thematic Review that there are significant challenges for the FRS in replicating real world modern fire conditions in a training environment.

289. The fire behaviour training facility at the Broughton Airbus factory is a demonstration unit that is not designed for the purposes of training for fire attack. The facility at Dolgellau has the same limitations as Cardiff Gate and Earlswood around the HRRs and ventilation profiles that can be achieved and with the need to not extinguish the fire to facilitate multiple student rotations. It is also much older than the South and Mid & West Wales facilities with all the associated challenges that brings. NWFRS are actively working towards building a new training centre. This should be pursued as a priority.

290. In the Dutch report 'When water goes up in smoke' referenced earlier, the experiments to determine the safest and most effective firefighting method of

advancing through a property towards a room on fire were conducted in a purpose-built rig.

291. The text copied below directly from the report describes the construction of the test rig:

‘One base scenario was applied to all experiments:

A major fire in a living room (6 – 8 MW) where the door from the fire room to the corridor is open, smoke is flowing into the adjacent corridor and the front door to the residence is open; no fire attack...

...In order to best approximate the real-life situation, the research was conducted in a brick building. The building was L-shaped, with the long part of the L-shape consisting of a 2- metre wide, 2.5 metre high and 20-metre long corridor. The fire room was located in the short part of the L-shape. This shape was chosen so that it would be impossible for the seat of the fire to be reached directly while carrying out the smoke cooling methods’.

292. Officers from the 3 Welsh FRS visited the Dutch FRS in February 2025 to view this and other training facilities. A rig such as that described above would be an excellent addition to a new training centre and to the best of my knowledge would be the only facility of its kind in the UK.

293. In the Operational Training Thematic Review, I referenced the UL FSRI Hose Stream prop. The text copied below describes its evolution:

‘The idea for the innovative Hose Stream Prop was sparked when FSRI research studies began to yield thought-provoking findings around the fundamentals of hose stream mechanics – specifically air entrainment and water mapping. These concepts are the ground-level building blocks needed to understand the impact of varying suppression tactics on the fireground. From these findings, FSRI research engineers began by building a prototype training prop to visualize and interactively demonstrate these concepts.

With the help of trusted fire service partners and live training demonstrations throughout the country, FSRI research engineers designed several enhancements to optimize usability, increase the suppression concepts able to be visualized with the prop and much trial and error – leading up to the final version and current construction plans’.

294. UL FSRI have shared the plans online to allow FRS to build their own Hose Stream props along with instructional videos and lessons plans. If NWFRS were to adopt a hub and spoke approach to training delivery a Hose Stream prop at each hub would be an excellent resource.

Organisational arrangements for the delivery of operational policy - summary

295. Operational guidance and training programme development are dealt with by individual Station Managers. As with all Station and Group Managers in NWFRS they also undertake the role of Station Support Officer (SSO) for an RDS fire station/s. The SSO is responsible for all people management issues including the process by which trainee Firefighters move from development to competent.

296. The Operational Guidance Manager is responsible for Aide Memoirs and NOG implementation along with National Operational Learning (NOL) and Joint Organisational Learning (JOL). The Operational Guidance Manager sits within the Technical Operations Hub which is located at the Rhyl fire station complex. The Technical Operations Hub is the responsibility of the Area Manager for Technical Operations who reports to an Assistant Chief Fire Officer (ACFO).

297. The Training Programme Development Manager is responsible for all aspects of the pdrPro competency maintenance and recording system along with the Learn Pro Learning Management System and content. The Training Programme Development Manager sits within the Training & Development Hub and is also based out of the Rhyl fire station complex. This function is the responsibility of the Area Manager for Training and Organisational Development who reports to an ACFO.

298. Despite being in different functional Hubs both Managers work closely together. They both recognise the need to align operational guidance with training content. The very real challenge they have is the resourcing available to them to deliver this in practice. Neither Station Manager has a dedicated Team working to them despite the significant workload that writing, reviewing and developing guidance and training materials gives rise to. The Operational Guidance Manager explained that the process by which Aide Memoirs are developed is through allocating a work package to subject matter experts who are expected to undertake the work in addition to their core role. The Training Programme Development Manager acknowledged during our meeting that Learn Pro content requires a substantive review but that at present there is not the capacity available within the training instructor cadre to undertake such a review.

299. Training instructors work within Training Delivery and are located between the Rhyl fire station complex and the Dolgellau training centre. The Training Delivery Department are responsible for the delivery of all core skills training, the Incident Command School and the Driving School. Training Delivery sits within the Training & Development Hub along with the People and Organisational Development Team.

300. I raised the issues I have identified in this report relating to Learn Pro and Hwb Tân training package content with the instructors at the focus group I held with them at Rhyl. The instructors highlighted numerous challenges relating to course content development and training delivery in general which are summarised below:

- *Lack of instructor CPD days – not only for the purposes of standardisation but also self and training course content development. Organising guest*

speakers or subject matter experts with knowledge of fire attack / BA procedures would help to broaden instructor knowledge.

- *Training delivery taking priority over instructor CPD – the Service is playing a numbers game to keep pumps on the run rather than giving instructors time to update training packages/CPD days etc.*
- *Outdated procedures - learning following attendance on instructor courses should be shared to provide operational knowledge to be disseminated throughout the Service, as opposed to the instructor just obtaining a qualification.*
- *Middle managers recently attended an all-Wales training session on fire attack techniques; however no instructors were invited to attend; instructors would appreciate and greatly benefit from more involvement in training and learning sessions.*
- *Visits to training centres and other FRS would be beneficial to add leverage during any future CPD/standardisation days. CPD days in line with neighbouring services would also be beneficial to learn and share ideas/procedures and network with other instructors.*
- *SSOs would benefit from visiting initial training courses or refresher days, which would help them to cascade current and correct training techniques taught to their station during visits.*
- *Inadequate facilities with training venues spread across the Service – there is no single training hub which means extra hours spent travelling and organising equipment/resources across North Wales.*
- *Inadequate equipment and difficulty moving equipment to venues – equipment used for training has often been rejected from stations and the training appliance is an older divisional spare, meaning trainee Firefighters learn with outdated equipment which is different to what they'll experience on station.*
- *Moving equipment between venues is difficult and dangerous, as vehicles used are not appropriate for transferring equipment. Most Service training vehicles do not have a separate rear/cab space, which makes clean cab decontamination protocols difficult to follow.*

301. NWFRS is not a well-resourced organisation. The number of Station and Group Managers is largely predicated on that required for operational cover purposes. This is not the same as the minimum numbers required to cover all essential roles and is why Station and Group Managers also have SSO responsibility for fire stations.

302. The size of an FRS in respect of the number of stations and the population it serves is academic in the context of operational guidance and training material development and maintenance. NOG and the workload associated with its local implementation, development and maintenance are the same no matter how big or small the FRS. The development and maintenance of quality operational guidance and training materials is resource intensive and is beyond the capability of individual Station Managers no matter how committed they are. It is also a legal requirement. A pan Wales approach would absolutely assist but there is still a substantial in-Service workload to be managed.

303. It is outside of the scope of this report to consider funding of the Welsh FRS. The observation I would make is that based on the evidence gathered during this inspection I have serious concerns that NWFRS are not meeting their legal duties in respect of the provision of suitable and sufficient ORAs for all reasonably foreseeable incident types including dwelling fires and in relation to the training of Firefighters in appropriate hazard knowledge and control measure tactics. This can only be addressed by substantially increasing resources in this area of the Service.

Organisational arrangements for monitoring, auditing and reviewing operational performance

304. A robust operational assurance (OA) process is a critical component of any safety performance management system. For the FRS it consists of the active monitoring of incidents (either remotely or on scene), incident ground audits and reviews including through the debrief process. This is supported by the station audit program where skill maintenance training and all aspects of operational preparedness are quality assured. Done properly it allows the FRS to continually check the effectiveness of operational procedures, equipment and training and to make changes were necessary. It is critical to Firefighter and public safety which is why it featured so prominently in this inspection.

305. **Service Administrative Policy & Procedure Section 2 Order No. 11 – Operational Assurance** accessed through the Policy section on Hwb Tân is the extant policy for operational assurance within NWFRS.

306. The purpose of the policy is:

To detail the specific elements of the Operational Assurance (OA) process, which is conducted to monitor the organisations operational activities and compliance with Performance Standards (PS).

307. Section 6 of the policy is titled 'Internal/external related and other related documents' under which Health & Safety Guidance Note 65 (HSG 65) Successful health & safety management and **SAPPO Section 6, Order No 19 – Incident Debriefing Policy** is listed. HSG 65 is published by the HSE and is available on their website. I was unable to locate a copy of **SAPPO Section 6, Order No 19 – Incident Debriefing Policy** on Hwb Tân.

308. Section 7 of the policy is titled 'Introduction'. Paragraph 7.1 rightly states that a critical aspect of a safe and healthy workplace and compliance with HSG 65 is the effective monitoring of activities. It goes on to state that a 'fundamental area, where monitoring and assessment of our activities is crucial, is during practical activities whether operationally, scenario or exercise based'.

309. Section 8 of the policy describes the role of the Performance Standards (PS) Team however this Team, and the Professional Services Standards (PSS) Team that replaced it, no longer exist. I return to current arrangements further on in this section.

310. Section 9 of the policy describes the procedure for Officers mobilised to incidents for the purposes of incident command or operational assurance. This aspect of the policy remains extant and gives discretion to the Officer to either take charge of the incident or to carry out OA.

311. Section 11 of the policy is titled 'Operational Assurance Process' the principles of which remain extant although the mechanisms of data capture have been updated.

312. The final section, Section 12 'Policy Review', states that the SAPPO will be reviewed every 2 years. The policy is dated 12 July 2012. There are no entries on the version control page to indicate it has been reviewed since then.

313. The Group Manager responsible for Operational Assurance (Group Manager Response) shared with me a draft Operational Assurance policy and procedure which he confirmed will replace **Service Administrative Policy & Procedure Section 2 Order No. 11 – Operational Assurance** once approved.

314. The draft policy is titled Operational Assurance (OA) of Operational and Control staff and runs to two pages.

315. The draft policy statement reflects the intent contained within the extant policy:

The Service is constantly seeking to improve its performance as an organisation.

A critical aspect of the management of a safe and healthy workplace, and compliance with Health and Safety Guidance Note 65 (HSG65), is the effective monitoring of activities.

OA is conducted to monitor compliance with current operational policies, procedures and adopted National Operational Guidance (NOG) relating to the mobilisation and attendance at operational incidents.

OA is a means of measuring and recording organisational, team and individual performances of uniformed operational and control staff during their response to operational incidents, training exercises, simulations and drills.

316. The substantive detail underpinning the draft policy is contained within a procedure of the same name - **Operational Assurance (OA) of Operational and Control** procedure.

317. The 'Introduction' section of the procedure sets out the membership and purpose of the Operational Assurance Team (OAT) and the Operational Assurance Group (OAG).

318. The OAT consists of the 11 Station Managers each responsible for 4 fire stations (known as Locality Managers) and the 3 Service Delivery Group Managers who are responsible for the 3 Service areas within which the 44 fire stations are located - East; West and Central. The role of the Locality Manager differs from that of an SSO. Locality Managers are responsible for all aspects of the Station Assurance program which includes audits and the active monitoring of all competency maintenance and development activities ranging from individual standard practices, composite drills, scenarios to tactical exercises. Locality Managers are also SSOs for the wholetime station within their grouping of 4 stations and have overall responsibility for the performance management of the grouping. As with their functional counterparts these are large references which reflect the limited resources available to the Service.

319. The OAT has for all intents and purposes replaced the PSS Team which was disbanded in 2022. The PSS Team was introduced in 2016. It was headed by an Area Manager along with a Group Manager and five Station Managers to ensure one PSS Team member was always on duty. The substantive difference between OAT and PSS is that the Locality Managers in the former each have responsibility for 4 designated stations whereas the latter was a pan Service dedicated resource.

320. There were mixed views expressed to me on station visits and in focus groups on the merits or otherwise of the current arrangements versus the legacy arrangements. I will revisit this issue later in this section.

321. All operational senior officers in NWFRS conditioned the flexible duty system referred to as 'Officers' in this report are responsible for the active monitoring of operational incidents when mobilised and when they take the decision not to take charge of the incident.

322. Although it is not expressly stated in the procedure the Group Manager Response explained to me that the purpose of the OAG is to consider the outcomes of active monitoring of incidents and exercises and from station audits undertaken by the OAT. The OAG will meet as a minimum once each quarter and will be chaired by the Group Manager Response. The membership of the OAG is as follows:

- 3 x Service Delivery Group Managers
- A member of the Fire Control Management Team (CMT) responsible for OA within Fire Control
- Station Manager Assurance & Resourcing
- Station Manager Incident Command

323. The procedure states that the Group Manager Response will:

...compile a report to provide regular updates to the Operational Learning Committee (OLC) on Operational Assurance activity, identified issues and any additional work streams being undertaken by the Team or Group.

The OLC is chaired by an ACFO and consists of the following standing members:

- Head of Response
- Head of Technical Operations
- Head of Fire Safety
- Head of Training and Development
- Head of Control
- Operational Assurance Group Chair
- Operational Learning Group Chair
- Operational and Control Training and Development Group Chair
- NOG and Policy Group Chair
- Research and Innovation user Group Chair
- Risk Information Group Chair
- Station Manager National Resilience
- Risk, Safety and Claims Manager

- Executive Assistants

The objectives are the OLC are to:

- *Monitor and scrutinise organisational learning from internal sources to ensure a safe and effective workforce.*
- *Monitor and scrutinise organisational learning from external sources to ensure a safe and effective workforce.*
- *Provide timely strategic direction in relation to on organisational Learning to maintain a safe and effective workforce;*
- *Provide strategic insight and intelligence in relation to organisational learning, from internal and external sources, to maintain a safe and effective workforce.*

324. The Post Incident Form (PIF) is how operational crews submit observations from post incident hot debriefs.

325. The OA return function on pdrPro is how Officers submit observations from active monitoring at incidents. Observations specific to individual Incident Commanders are submitted through the Effective Command system.

326. The Station Manager Assurance & Resources maintains an OA trends spreadsheet to record examples of positive and negative practice submitted through the various OA electronic reporting systems. This is the OA element of the role. The 'Resources' element is concerned with all aspects of operational crewing across the Service which takes most of this Officer's time.

327. The Group Manager Response confirmed to me that there is limited scrutiny of the OA returns as there is no dedicated resource to undertake it.

Incident monitoring

328. Incident monitoring is undertaken by Station and Group Managers conditioned to the flexible duty system. Area Managers and Principal Officers also undertake incident monitoring at larger incidents.

329. Because of the size of the area covered by NWFRS Fire Control mobilises the nearest Station or Group Manager irrespective of rank to the incident. Officers can be mobilised to take charge of the incident or to undertake active monitoring. **SAPPO Section 2 Order No 11 Operational Assurance** states that an Officer will be mobilised to every incident with a pre-determined attendance of more than one fire appliance other than Automatic Fire Alarm actuations. At the meeting with the Area Manager (Head of Response) and Group Manager Response they explained that the only variation to this is when the Officer in Charge of the fire appliance is in development and is on the mentoring list. In these circumstances an Officer would be mobilised for the purposes of mentoring even if the incident only required the attendance of a single fire appliance.

330. Once in attendance the Officer can either decide to take charge of the incident or remain on scene to undertake OA. The guidance within the policy states that the decision to take charge should be *'based on the size, complexity and duration of the incident'*.

331. There are no pre-determined triggers based on spans of control for when an Officer will take charge i.e. when four or more appliances are in attendance.

332. I recognise the significant geographic challenges faced by NWFRS in responding Officers to remote rural locations. That said I consider that there would be merit in undertaking an analysis of incident ground roles and responsibilities to predetermine the point at which spans of control for an Incident Commander are likely to be exceeded. This would typically be based on the numbers of appliances in attendance and would allow Fire Control to mobilise an Officer for the designated purpose of assuming command. In these circumstances an Officer of the next highest rank would be notified or mobilised for the purposes of active incident monitoring.

333. In any event for management of road risk purposes when any Officer is mobilised to an incident irrespective of the purpose, I strongly recommend that NWFRS formalise the process of immediately notifying another Officer to undertake active incident monitoring. The notified Officer would log into the mobilising system, familiarise themselves fully with the incident log and progress of the incident and monitor incident ground messages on their fire ground or main scheme radio. This would allow the Officer responding under emergency response conditions to focus solely on driving without having to also attempt to monitor any developments with the incident. Once in attendance they would contact the Officer undertaking active incident monitoring who would update them fully on the incident and share with them their appraisal of progress and any potential areas of concern. I make a substantive recommendation to this effect in Section 3 of this report. The draft **Operational Assurance (OA) of Operational and Control** procedure contains guidance on OA at incidents along with a mentoring checklist.

Incident review and debriefing

334. On station visits Firefighters, Crew and Watch Managers confirmed that it was standard practice to undertake a hot debrief at the conclusion of an incident.

335. It was well understood that any issues of good practice or concern would be captured on the PIF. On every station visit there was an awareness of the PIF its purpose, where it could be found and where it should be submitted to. There were however few occasions noted when either acknowledgement or feedback had been received following the submission of a PIF on an operational firefighting matter post incident. The opposite was true for non-operational firefighting matters for example those relating to home safety issues to which Firefighters stated that there was almost always a response.

336. I was unable to locate a copy of **SAPPO Section 6, Order No 19 – Incident Debriefing Policy** on Hwb Tân.

337. Under the heading ‘Debrief management’ the draft **Operational Assurance (OA) of Operational and Control** procedure states that:

‘Incidents of note, requiring a structured debrief will be identified by Locality Managers or requested via the OAT by attending FDS officers, CMT or attending ICs. A structured debrief will have the ability to record all information relating to an incident and produce data that can be used for scrutiny, discussion and action purposes’.

338. The procedure goes on to explain that the Station Manager Assurance & Resources will be responsible for collating information and arranging structured debriefs following incidents identified as containing internal and/or external learning opportunities.

339. There are structured debrief reports published to Hwb Tân accessed via the Response page however the most recent dates to 2017. More recent debrief reports are held on a dedicated Teams channel however this has limited accesses permissions.

340. To ensure immediate capture and review of issues identified at incidents the Group Manager Response or their deputy should host daily meetings at the change of shift to be attended by all on duty Officers to review all incidents occurring over the last 24 hours. This would give advance notice of identified issues that they could act on immediately without having to await the submission of a PIF or an OA return through pdrPro. I make a recommendation to this effect in Section 3 of this report.

341. There is no process set out for the review of Analytical Risk Assessments (ARAs) in the OA procedure. The Group Manager Response explained to me that hard copy ARAs are completed on scene. Post incident they are sent to the Operations Department where they are scanned and held on file. They are not routinely analysed but are available on request.

342. In a follow up meeting with the Group Manager Response, I asked how many near miss reports had been submitted for issues identified at dwelling fires. The answer I was given was none that relate to the issues identified in this report.

343. At my meeting with the Group Manager responsible for fire investigation I explained the purpose of me requesting fire investigation reports, specifically that my interest was in fire development rather than cause and origin. We reviewed numerous scene photographs from incidents that I had highlighted through the analysis and were able to identify incontrovertible evidence of fire development and progression particularly in respect of bidirectional and unidirectional flows at the point where Firefighters made an entry into the premises. When this is mapped against the incident log and first account statements it is possible to build a comprehensive understanding of the incident and how the tactics employed contributed to the outcome.

344. Many of these incidents would make excellent case studies and highlight the value that fire investigation officers can bring to the incident review process.

Organisational arrangements for monitoring, auditing and reviewing operational performance – summary

345. NWFRS cover a large geographic area. Apart from Wrexham which has two wholetime and one RDS appliance, the other two shift and five day crewed wholetime stations are located along the coast (one wholetime and one RDS appliance at each). Inland of the coast the remaining territorial area is covered by RDS stations. Given the size of the area and distribution of population centres this is a limited number of wholetime appliances which is reduced further overnight when the day crewed appliances switch to RDS cover. RDS availability is low during the daytime as it is throughout much of the UK. This results in significant disparities in emergency response cover across North Wales with extended response times for fire appliances and even longer for Tactical Officers due to their travel distances. I do not therefore underestimate the challenges facing NWFRS in achieving a robust process of operational assurance and particularly active incident monitoring.

346. NWFRS have a well-established and understood process for hot debriefs, through completion of the PIF. As stated previously I was unable to locate a copy of **SAPPO Section 6, Order No 19 – Incident Debriefing Policy** on Hwb Tân. The **Operational Assurance (OA) of Operational and Control** procedure places the responsibility on Locality Managers for determining if an incident requires a structured debrief.

347. The issues of concern I have set out in Section 1 of this report and to a degree referenced within Procedural Alert PA 017 2020 have not been identified either through the hot debrief process, submission of near misses or in any of the structured debrief reports I viewed through Hwb Tân and have not therefore been acted on to change the default tactical approach. I am of the view that is as much because of deficiencies I have highlighted within the content of Aide Memoirs and training packages than it is because of deficiencies with the OA process. The issues are simply not being recognised because the underpinning knowledge is not there.

348. The Group Manager Response has corporate responsibility for all aspects of OA which is delivered through the OAT (station audits) and the Station and Group Manager cadre (active incident monitoring). It is not possible for one individual to perform this safety critical role effectively in isolation no matter how committed they might be.

349. There were mixed views on the merits of the current OA arrangements versus the legacy arrangements through the PSS Team.

350. The PSS Team would often attend stations unannounced. It was relayed to me that the PSS Team was '*feared*' and that station audits were '*dreaded*' by Firefighters and Watch Officers. It was rightly acknowledged on all station visits, focus groups and structured interviews that there is no place for Teams, or any individuals being feared in the FRS.

351. There were however many comments and observations made in favour of the PSS Team in respect of its effectiveness in delivering OA and maintaining standards when compared to the extant arrangements, some of which are set out below:

...the assurance of almost every point of service delivery was in place, from acquisition of Firefighter skills to delivery of training, auditing of competency, procedural delivery against national guidance. The station auditing programme ensured that all H&S areas of the service were maintained and clearly understood. The team also assured incident data both during operational incidents and post through the debriefing and learning process...

The shift to 3 area OA Managers was a dilution of the OA delivery as no central function was in place or standardisation across the areas due to the logistics and service delivery area. However, it was still able to deliver some assurance with station auditing in a less formal delivery...

This year we have moved to an OA team of 1.5 persons, with the expectation of the station commanders to deliver OA. This is not actually practicable as it allows us to effectively mark our own homework if and when capacity allows as the paper round is so big currently.

352. I consider that there would be much value in a dedicated Operational Assurance Team or at least one additional Officer to support the Group Manager Response in actively monitoring, auditing and reviewing operational incidents alongside undertaking station audits. I recognise however that resource challenges mean that this may not be practical for NWFRS.

353. The arrangements for active incident monitoring make sense given the resources available to the Service and the geography. I believe that these arrangements could however be strengthened.

354. The purpose of declaring a tactical mode on the first informative message at an incident is to record on the log the outcomes of the dynamic risk assessment undertaken by the Incident Commander. This first informative message presents an opportunity to capture the extent of the hazards the Incident Commander has identified and the control measure tactics they intend to deploy to mitigate them and resolve the incident.

355. The typical content of an informative message from the analysis in this report is '2BA, hose reel, offensive mode'. This often follows an initial message stating 'smoke issuing' or 'well alight'.

356. If the Incident Commander was required to state the primary hazard alongside the control measure tactics this might look something like the following:

'Ground floor fully involved in fire, offensive exterior attack using a 45mm jet, transitioning to an offensive interior attack using a 45mm jet once knockdown is achieved, offensive mode'

357. Such a message would serve two purposes. Firstly, from an active monitoring perspective it would give confidence to the Officer monitoring the incident that appropriate control measures were being deployed to mitigate the identified hazard. In the example used above, if the tactical option was anything less than a 45mm jet (i.e. a 19mm high pressure hose reel), then there would be an opportunity for the Officer monitoring the incident to intervene, albeit remotely. It would also serve to reinforce the Decision Control Process being used by the Incident Commander and avoid the possibility of adopting a default tactic as, in my view but supported by the analysis of tactics adopted at the 97 incidents considered in this report, is the case now.

358. Secondly, from an incident audit and review perspective there would be no doubt as to the tactics that had been employed. Their effectiveness could be assessed by the extent of the damage at the conclusion of the incident, which would be stated on the Stop message, and by analysis of any fire investigation report.

359. The Service would need to determine how such a message should be framed and articulated but discharged as a fast time action I believe it would have an immediate and beneficial effect on Firefighter and public safety. For that reason, I make a substantive recommendation to that effect in the next section of this report.

Section 3

Recommendations

360. The recommendations from the 3 previous Thematic Reviews referenced within this report are all directly relevant to issues identified during the inspection. NWFRS have made some progress against the recommendations from the Learning from Grenfell and Operational Training reviews but no progress at all against the recommendations in the Broadening of the role of Firefighters' review. Given the significance of the issues identified in this report this should be actioned as a priority.

Recommendation 1: All previous Thematic Review recommendations should be fully implemented and by no later than December 2025

361. 'Foundation for firefighting' and 'Firefighting' operational guidance was published on 1 October 2024. All 3 Welsh FRS must now review and revise their firefighting operational guidance. There is no logic that supports each Service doing this individually. Accordingly, I revised Recommendation 2 of the South Wales inspection report within the Mid & West Wales inspection report to reflect a pan Wales intent. I repeat that recommendation here.

362. The operational guidance developed by South Wales FRS should be adopted by NWFRS as an interim measure to address the gap created through the transition from SOPPOs to Aide Memoirs pending the development of pan Wales guidance.

Recommendation 2: NWFRS should collaborate with South Wales and Mid & West Wales FRS to undertake a fundamental review and rewrite of firefighting guidance. The outcome of this review should be that firefighting hazard knowledge and control measure tactics are scientifically correct, reflect the most current research and are clearly and unambiguously expressed in one piece of guidance that is easily accessible to all Firefighters. Work on this recommendation should commence immediately with updated guidance published no later than July 2025

363. As identified within the South and Mid & West Wales FRS inspection reports rewriting operational guidance will only be the first step in changing well embedded practices. A comprehensive program of retraining will be required to shift the current default approach followed by an ongoing program of maintenance training. This will require a substantial investment of time and effort, but it is critical to improving Firefighter and public safety.

Recommendation 3: In parallel with Recommendation 2 a comprehensive training program must be developed. This should be done in collaboration with South Wales and Mid & Wales FRS. Underpinning knowledge packages on the LearnPro system must fully reflect the content of the updated operational guidance. Micro teaches should be developed for every control measure tactic to give Crew and Watch Managers the best possible resource library of training aids to support the delivery of on station practical skill maintenance training.

Combined, and subject to a time and motion study, these packages will give a meaningful time value to inform the allocation of blocks of time within the station work routine. Work on this recommendation should commence immediately with updated training packages published no later than November 2025.

364. The OA arrangements within the Service largely reflect the available resourcing. There is no dedicated Operational Assurance Team to attend incidents solely for the purposes of active incident monitoring. Instead, active incident monitoring is undertaken by the Officers on duty at the time. The function of OA is the responsibility of the Group Manager Response but there is the potential for a delay in them being made aware of risk critical occurrences at incidents due to the time it may take for a PIF to be submitted or for the OA section of pdrPro to be updated.

Recommendation 4: To ensure immediate capture of issues identified at incidents the Group Manager Response or an Officer deputising on their behalf should host daily meetings at the change of shift to be attended by all on duty Tactical Officers to review all incidents occurring over the last 24 hours. This would give the Group Manager Response advance notice of identified issues that they could act on immediately without having to await the submission of a PIF or the OA section of pdrPro to be updated.

365. The first informative message from an incident at which the tactical mode is declared presents an opportunity to capture the extent of the hazards the Incident Commander has identified and the control measure tactics they intend to deploy to mitigate them and resolve the incident.

366. If this message stated the primary hazard and the control measure tactics in use alongside the tactical mode this would be recorded on the incident log but could also be monitored live via main scheme radio. Any obvious disconnect between hazard and control measure tactic could be picked up in real time and addressed possibly prior to an adverse safety event.

Recommendation 5: NWFRS should introduce the concept of a first informative message that states the primary hazard and control measure tactics in use alongside the tactical mode. The same would apply to any subsequent informative messages.

367. The geographic size of the NWFRS area is such that Officers mobilised to incidents may have to travel excessive distances, sometimes at night on rural roads. Notifying a second Officer to undertake active monitoring of the incident to allow the mobilised Officer to focus solely on driving would serve as an effective control measure in these circumstances.


Recommendation 6: For management of road risk purposes NWFRS should consider formalising the process of notifying another Officer to undertake active incident monitoring. This would allow the Officer responding under emergency response conditions to focus solely on driving without having to also attempt to monitor any developments with the incident. Once in attendance they would

contact the Officer undertaking active incident monitoring who would update them fully on the incident and share with them their appraisal of progress and any potential areas of concern.

Acknowledgements

368. I would like to place on the record my thanks to the following people:

- CFO Dawn Docx, NWFRS, for facilitating the inspection and for giving me full access to the NWFRS mobilising system and Hwb Tân through the issue of a NWFRS laptop.
- ACFO Antony Jones, NWFRS for the issue of a laptop and granting of the necessary permissions to access the NWFRS mobilising system and Hwb Tân and for arranging focus groups, structured interviews and station visits.
- Antony Gardner, Welsh Government Fire Branch, for his support on station visits.
- Station Officer Gerard Mann, Fire Rescue Victoria, for the technical fact check of the report contents in respect of firefighting research.
- Robert Scott QFSM, HM Chief Inspector of the Scottish Fire and Rescue Service, for the peer review of the report.

Report to	North Wales Fire and Rescue Authority	
Date	21 July 2025	
Lead Officer	Helen MacArthur, Assistant Chief Officer, Finance and Resources	
Subject	Firefighters Pension Schemes Discretionary Policy Statement	

PURPOSE OF REPORT

- 1 To inform Members of the requirement for the Scheme Manager, North Wales Fire and Rescue Authority (the Authority) to produce a Firefighters Pension Discretionary Policy Statement.
- 2 To seek approval of the resolutions within the Firefighters Pension Scheme Discretionary Policy Statement including the proposal that, on behalf of the scheme manager, decisions will be delegated on a day-to-day basis to officers of the Service.

EXECUTIVE SUMMARY

- 3 The Firefighters' Pension Scheme Regulations provide the Authority with the responsibility to make decisions on certain discretionary elements of the scheme. The Authority is required to formulate and publish a discretionary policy which sets out how the Authority will discharge this responsibility. The discretionary policy was previously approved in 2020 and in accordance with good practice has been reviewed and revised.

CONSIDERATION BY THE LOCAL PENSION BOARD

- 4 The draft Discretionary Policy Statement was discussed by members of the Local Pension Board at the meeting on 15 May 2025. The members of the LPB endorsed the resolutions within the draft policy including delegation to officers of the Service.

RECOMMENDATIONS

- 5 It is recommended that Members:
 - i) **approve the resolutions within the Firefighters Pension Scheme Discretionary Policy Statement including, where appropriate, the delegation to officers of North Wales Fire and Rescue Service (the Service).**

BACKGROUND

- 6 There are currently four pension schemes in place for firefighters, the 1992 scheme (FPS), the 2007 scheme (NFPS), the 2007 RDS modified pension scheme (MPS) and the 2015 scheme. This policy sets out the discretions applicable to the schemes on which the Authority in its capacity of Scheme Manager is required to determine its desired approach.

INFORMATION

- 7 The firefighters' pension scheme regulations require every scheme manager to:
- (i) issue a written policy statement on how it will exercise the various discretions provided by the pension schemes;
 - (ii) keep it under review; and
 - (iii) revise it as necessary.
- 8 A summary of the discretionary elements within each scheme and the recommended approach is set out in the draft discretionary policy attached at Appendix A.

IMPLICATIONS

Wellbeing Objectives	The Discretionary Policy provides clarity for decision making on certain pension issues contributing to securing the Authority's financial sustainability.
Budget	Certain decisions can impact the budget in terms of increased employer superannuation payments and the impact on future actuarial valuations.
Legal	The regulations governing the administration of the Firefighters' Pension Schemes provide for a number of discretionary powers on the part of the Fire Authority.
Staffing	Potential impact on staffing levels if certain discretions impact a member's retirement decision making process. Potential impact on the acceptance of temporary promotions offered.
Equalities/Human Rights/ Welsh Language	None
Risks	Non-compliance with legislation

Firefighters' Pension Scheme Discretionary Policies

<u>The Firefighters' Pensions Scheme Wales 2015</u>			
Regulation	Explanation	Decision NW	Comments
Regulations 4A to 4D: Local Pension Boards.	<p>The scheme manager must establish a Local Pension Board in accordance with Regulations 4A to 4D of the Firefighters' Pension Scheme. The Board has responsibility for ensuring compliance with the Firefighters' Pension Scheme Regulations 2014 and any other legislation relating to the governance and administration of the Firefighters' Pension Scheme (Wales) 2015 and any connected scheme.</p> <p>The scheme manager must have regard to guidance issued by the Welsh Government relation to Local Pension Boards, but the Authority will select the members.</p>	Yes	Not previously included
Regulation 5 (2): Delegation.	In accordance with Regulation 5(2) of the Firefighters' Pension Scheme (Wales) 2015, the scheme manager may delegate any of their functions including the power to delegate.	Yes	Not previously included
Regulation 16(2)(b): Opting out of the Scheme. Discretion to determine date at which pensionable service ceases.	The scheme manager has discretion to determine the date at which a person's pensionable service will cease if the person opts out of the scheme and the Authority consider that the first day of the first pay period beginning on or after the date on which the option is exercised would be inappropriate.	Yes	Not previously included

Regulation 17(1)(d): Discretion to allow Continual Professional Development payments to be treated as pensionable.	The scheme manager has discretion under Regulation 17(1)(d) of the Firefighters' Pension Scheme (Wales) 2015 Regulations to permit an amount paid to a member for Continued Professional Development to be treated as pensionable pay.	Yes	Not previously included Treated as pensionable
Regulation 19(c): Active membership – unpaid authorised absence.	The scheme manager has discretion to permit a person to count a period of unpaid authorised absence as active membership of the Scheme. (This would be subject to that person paying the required contributions under Regulation 111(4)).	Yes	Not previously included
Regulation 28 (2): Establishment of pension accounts: general. Discretion to keep in such form as the scheme manager considers appropriate.	The scheme manager must establish and maintain pension accounts for scheme members, in accordance with Part 4 of the Firefighters' Pension Scheme (Wales) 2015 Regulations but they may be kept in such form as the scheme manager considers appropriate.	Yes	The Authority will maintain pension accounts for scheme members in the most appropriate form considered by the Authority.
Regulation 37(3), (4) and (5): Closure and re-establishment of active member's account. Scheme manager's discretion to select appropriate account where more than one account held.	If a member has more than two active member's account and ceases pensionable service with less than three months' qualifying service in respect of one account, that account must be closed, and benefits aggregated with one of the others; the member may select which one. If the member fails to choose, the scheme manager has discretion to choose.	Yes	Where a member fails to choose an account to use to aggregate benefits, the Authority will choose the account considered most appropriate by the Authority. This is likely to be the most cost effective account to the Authority, but each case will be considered on its merits and full details of the circumstances will be required.
Regulation 49(3) and (4): Closure of deferred member's account after gap in pensionable service not exceeding 5 years. Discretion to select which account is to be closed where more than one account is held.	If a deferred member re-enters pensionable employment after a gap of five years or less, the scheme manager shall close the deferred member's account and re-establish the active member's account, transferring entries from the deferred account. If the person had more than one relevant deferred member's account, they must select – within three months of re-entering scheme employment - which one should close. If they fail to make a selection, the scheme manager must make the choice for them.	Yes	Where a member has more than one deferred account and fails to choose which account to close, the Authority will choose the account considered the most appropriate by the Authority. This is likely to be the most cost effective account to the Authority, but each case will be considered on its merits.

<p>Regulation 62(1) and (2): Employer initiated retirement. Discretion to award immediate payment of retirement pension without reduction.</p>	<p>The scheme manager, having regard to the economical, effective and efficient management of their functions and taking account of the costs likely to be incurred in a particular case, may determine under Regulation 62 of the Firefighters' Pension Scheme (Wales) 2015 Regulations that an active member who is at least age 55 but under normal pension age (60), and who is dismissed from scheme employment by reason of business efficiency or whose employment is terminated by mutual consent on the grounds of business efficiency, should receive immediate payment of retirement pension without the early retirement reduction.</p> <p>In accordance with Regulation 120 of the Regulations, if the scheme manager uses this discretion to make an early payment of retirement pension, they will have responsibility for payment of an employer initiated retirement additional contribution calculated in accordance with Regulation 120(2). This would be paid into the Firefighters' Pension Fund as required by Regulation 123.</p> <p>If the scheme manager is considering making an award under Regulation 62 for a connected member of the Firefighters' Pension Scheme (Wales) 2007, they must also consider employer initiated retirement under Part 3, Rule 6 of the Firefighters' Pension Scheme (Wales) 2007 scheme.</p>	<p>Yes</p>	<p>The Authority will not normally grant early payment of benefits for business efficiency purposes or waive any actuarial reduction, except in exceptional circumstances, after considering the business case; agreement must be given by the Chief Fire Officer, in consultation with the Treasurer.</p>
<p>Regulation 63(5): Exercise of partial retirement option</p>	<p>If, as allowed by Regulation 63 of the Firefighters' Pension Scheme (England) Regulations 2014, an active member aged at least 55 opts to continue in pensionable service under the scheme but claims payment of pension accrued up to the date of option in one or more of their active member's pension accounts, this partial retirement option shall be taken to be exercised on such date as the member and the scheme manager agree. The scheme manager decides the form in which notice must be given.</p>	<p>Yes</p>	<p>Where a member aged at least 55 opts to claim the whole of their accrued pension but continue in pensionable service, the Authority will agree a date most suitable for the Authority, taking into account operational requirements.</p>
<p>Regulation 68(1) and (2): Review of ill-health award or early payment of retirement pension</p>	<p>If an ill-health award is made, the scheme manager must keep the recipient's entitlement under review subject to the person being under deferred pension age at the time of</p>	<p>Yes</p>	<p>Every 5 years the Authority will undertake ill health pension reviews for individuals who are under the deferred pension age and have been</p>

on ill-health grounds. Discretion to select appropriate timing of review.	<p>review and having been in receipt of the pension for less than 10 years. The scheme manager has discretion to decide the appropriate timing of review.</p> <p>Similarly, if the scheme manager determines that a deferred pension should be paid early on ill-health grounds, they must periodically review the recipient's entitlement to continuing payment of the award. Such reviews would be carried out until the person reaches deferred pension age and the scheme manager has discretion to decide the appropriate timing of review.</p> <p>The scheme manager must have a policy for reviewing at such intervals as it considers appropriate,</p>		<p>receiving the award for less than 10 years and will review the early payment of deferred pensions on ill-health grounds for so long as the recipient is below deferred pension age. Injury awards will be reviewed in line with the recommendation made by IQMP in their certificate.</p> <p>Written policy detailing frequency should be maintained and reviewed</p>
Regulation 69(3): Consequences of review	If, following the review of a lower tier ill-health pension under Regulation 68, the scheme manager determines that the recipient is capable of performing the duties appropriate to the role from which the person retired on grounds of ill-health, the employer must consider whether or not to make an offer of re-employment.	Yes	Where a member is receiving a lower tier ill-health pension and becomes capable of performing the duties appropriate to the role from which they retired, the Authority will consider making an offer of re-employment based on the individual circumstances.
Regulation 70: Commencement of pensions. Discretion to determine date of commencement of payments.	<p>In accordance with Regulation 70(1) and (2), where an active member has not claimed payment of the retirement pension before the date on which they retire, the scheme manager shall, determine the date on which payment will commence and will notify the member accordingly.</p> <p>In accordance with Regulation 70(8), if a member requests deferral of payment of a deferred pension beyond deferred pension age (Regulation 70(5)(a)), or requests early payment with an early payment reduction before deferred pension age (Regulation 70(5)(b)), the scheme manager shall decide the payment date after the claim for payment has been made.</p>	<p>Yes</p> <p>Yes</p>	Not previously included

Regulation 72(3)(b) and (4): Allocation election. Discretion to withhold consent if scheme manager is not satisfied that nominated person is substantially dependent on the member.	The scheme manager may withhold consent for the allocation of a portion of pension to a dependant who is not the spouse, civil partner, or cohabiting partner of an active or deferred member. (Consent can be withheld if the scheme manager is not satisfied that the person nominated is not substantially dependent on the active member).	Yes	Before giving consent to the allocation, it must be demonstrated to the satisfaction of the Authority that the nominee is a person substantially dependent on the member. The Authority will consider financial evidence over a period of two years. Each case will be considered on its merits and full details of the circumstances will be required.
Regulation 73: Making an allocation election. Proof of the member's normal life expectancy.	The scheme manager must be satisfied that a member who makes a nomination election has normal life expectancy at the time of the request. The scheme manager must decide how this is to be judged, e.g. by the member's GP or the Occupational Health Physician, or by an IQMP's opinion	Yes	Not previously included This determination will be made by an IQMP appointed by the Scheme Manager
Regulation 75 (1) and (2): Adjustment of allocated benefit. Discretion to adjust allocated benefit if member dies after reaching age 75.	If a member who has made an allocation election dies after reaching age 75, and the amount of allocated pension does not qualify as a defendant's scheme pension under section 167 of the Finance Act 2004 (pension death benefit rules), the amount may be adjusted in a manner determined by the scheme manager.	Yes	Where an allocated pension does not qualify as a dependant's scheme pension, the Authority will adjust the amount accordingly.
Regulation 76: Meaning of "surviving partner": Discretion to waive qualifying period for surviving partner's pension in the case of a co-habiting partner.	A cohabiting partner may be considered a "surviving partner" and potentially qualify for a pension provided they meet certain conditions, one of which is that they must have been in a "long-term relationship" – a continuous period of at least two years – at the date at which entitlement needs to be considered. The scheme manager has discretion to allow the person to qualify where the period is less than two years.	Yes	Where a Surviving Partner has been in a long-term relationship for a continuous period of less than two years, the Authority will not consider that person to qualify unless in exceptional circumstances. Each case will be considered on its merits and full details of the circumstances will be required.
Regulation 85: Meaning of "eligible child". Discretion as to timing of review if eligibility is based on permanent disablement	If a child's pension is put into payment because of the child's dependency on the member on the grounds of permanent disablement and, at review, it is considered that the recipient is no longer permanently disabled, the pension will cease to be payable (unless the child would be entitled to the pension under any other terms of eligibility).	Yes	Not previously included

Regulation 95: Person to whom lump sum death benefit payable. Discretion of Scheme manager to select recipients.	The scheme manager has absolute discretion to pay any lump sum death benefit to or for the benefit of the member's nominee, personal representative or any person appearing to have been a relative or dependent of the member.	Yes	The Authority will use their discretion on who receives any lump sum death benefit where the matter does not appear straightforward.
Regulation 100(2): Payment of pension in respect of an eligible child below age 18. Discretion relating to payment of child's pension.	If an eligible child's pension is payable in respect of an eligible child below age 18, the scheme manager must determine to whom it should be paid and shall give directions to that person as to how the payment should be applied for the eligible child's benefit.	Yes	When paying Death Benefits to an eligible child under age 18, the Authority will make considerations on a case by case basis as to whom it should be paid and how the payment should be applied.
Regulation 101(2) and (93): Surviving partner's pensions and eligible child's pensions. Discretion to suspend and recover.	A scheme manager has the right to cease paying a surviving partner's pension and/or eligible child's pension and recover any payment made in respect of a pension where it appears to the scheme manager that the recipient made a false declaration, or deliberately suppressed a material fact in connection with the award. (This does not affect the scheme manager's right to recover a payment or overpayment under any other provision where the scheme manager considers it appropriate to do so).	Yes	The Authority will cease payment of a surviving partner's pension and/or eligible child's pension and recover any payment made in respect of a pension where it appears a false declaration had been made or where a material fact has been deliberately suppressed.
Regulation 102: Provisional awards of eligible child's pensions: Discretion for later adjustments.	If children's pensions have been made to certain persons on the basis that they were eligible children and there were no others, and subsequently it appears that any of those children were not eligible, or there was a further eligible child to whom no payment has been made, or that a child born after the member's death is an eligible child, the scheme manager has discretion to adjust the amount of pension, as required, in view of the facts as they subsequently appear. The adjustments may be made retrospectively.	Yes	Where a child is eligible/ineligible to a child's pension, the Authority will adjust the pensions accordingly. Each case will be considered on its merits and full details of the circumstances will be required.

	employment because of illness or injury and not entitled to receive pay (including statutory pay), they may elect to pay contributions on the pay they were entitled to receive before it ceased. If the member so elects, the scheme manager may use their discretion to require the member additionally to pay the employer's contribution in respect of that period of absence.		In cases of Child related or Reserve Forces Service absences, the Employer MUST pay its contributions should the member wish to buy back these periods of absence.
Regulation 114(1), (2) and (3): Deduction and payment of contributions. Discretion to agree with member the method of payment of employee contributions.	<p>Member contributions due may be deducted by the scheme employer from each instalment of pensionable pay as it becomes due unless another method of payment has been agreed between the scheme manager and the member.</p> <p>Contributions due in respect of absence from work on reserve forces service leave may be deducted from any payment made under Part 5 of the Reserve and Auxiliary Forces (Protection of Civil Interests) Act 1951.</p> <p>Contributions which the member is required to pay or has elected to pay under Regulations 111 and 113 may be paid by a lump sum or by deduction from instalments of pensionable pay as agreed between the member and the scheme manager.</p>	<p>Yes</p> <p>Yes</p> <p>Yes</p>	<p>The Authority will ensure that member contributions due under Regulation 114 may be deducted from each instalment of pensionable pay as it becomes due unless another method of payment has been agreed between the Authority and the member. The Authority will ensure that member contributions due in respect of absence from work on reserve service leave may be deducted from any payment made under Part 5 of the Reserve and Auxiliary Forces (Protection of Civil Interests) Act 1951. The Authority will ensure that member contributions which the member is required to pay or has elected to pay may be paid by a lump sum or by deduction from instalments of pensionable pay as agreed between the member and the Authority and agreed on a case by case basis.</p>
Regulation 135(4): Statement of transfer value entitlement. Discretion to extend period in which guarantee date falls.	The scheme manager must specify in a statement of entitlement the "guarantee date" date by reference to which the cash equivalent or club transfer value is calculated; this date must fall within the three months beginning with the date of the member's application for the statement of entitlement and within ten days ending with the date on which the member is provided with the statement. The scheme manager has discretion, if it believes reasonable, to extend this date to within six months of the date of the member's application if, for reasons beyond the scheme manager's control, the information needed to calculate the	Yes	The Authority will only extend the date of calculation of transfer value where the information needed to calculate the transfer value cannot be obtained before the end of the three month period, or where there are circumstances beyond their control. The date of extension will not be extended beyond six months of the member's application.

	transfer value cannot be obtained before the end of the three month period.		
Regulation 141(3): Request for acceptance of a transfer payment. Discretion to extend time limit for request.	<p>It is not the policy of the Authority to consider extending the time limit for a transfer in of previous pension rights to proceed after twelve months of joining unless:</p> <p>(i) the scheme member has requested that investigations commence within the twelve month time limit, or</p> <p>(ii) if there is reason to believe that the individual would not have known of the need to request an investigation into potential transfer in or previous pension rights within the twelve month time limit, and the HR and/or pension files support this. Only in exceptional circumstances will a longer period be allowed so long as there is no known reason or prospect of the employee having access to their pension rights within the next 12 months.</p> <p>This also applies to occupational pension scheme transfer requests.</p>	No	<p>There is a time limit of one year from becoming an active member in which a person can request a transfer payment from a non-occupational pension scheme. The scheme manager has the discretion to extend this period.</p> <p>An extension will only be considered in cases of maladministration.</p>
Regulations 142 and 144: Transfer statement and club transfer value statement. Discretion to require member to request manager of other pension scheme to provide statement of transfer value.	The scheme manager can require an active member to ask the scheme manager of a previous pension scheme to provide a statement of the amount of transferred pension that the member would be entitled to count if the transfer were to proceed.	Yes	Apply this discretion; each case will be considered on an individual basis.
Regulation 152: Role of IQMP in determinations by the scheme manager.	If a medical issue has to be addressed, the scheme manager shall seek, and have regard to, the written opinion of an Independent Qualified Medical Practitioner ("IQMP") <u>selected by them</u> .	Yes	Not previously included
Regulation 155(2): Notice of appeal (Board of Medical Referees).	If a member wishes to appeal against a determination made by the scheme manager and their grievance lies in the medical opinion upon which the determination was based, they can appeal to a Board of Medical Referees. The notice	Yes	Not previously included

<p>Regulation 163: Appeals on other issues: requirement to deal with a person's disagreement by Internal Dispute Resolution Procedures ("IDRP"). Discretion to decide local IDRP arrangements.</p>	<p>If a member disagrees with the scheme manager's determination of award and the disagreement does not involve an issue of a medical nature, the member can require the scheme manager to deal with the disagreement under Internal Dispute Resolution Procedures by written notice given to the scheme manager within 28 days of the receipt of the determination.</p> <p>In compliance with section 50 of the Pensions Act 1995 (requirement for dispute resolution arrangements) and the Occupational Pension Schemes (Internal Dispute Resolution Procedures Consequential and Miscellaneous Amendments) Regulations 2008, the scheme manager must have Internal Dispute Resolution Procedures in place, but they can determine who should be decision makers at Stage One and at Stage Two.</p> <p>These arrangements would also apply for other issues not directly covered by Regulation 163, but which may be appealed under Section 50 of the Pensions Act 1995.</p>	<p>Yes</p>	<p>Where a member disagrees with the Authority's determination of award under Regulation 151 and the disagreement does not involve an issue of a medical nature, the member can follow the Internal Dispute Resolution Procedure (IDRP) to seek a resolution.</p> <p>In line with IDRP procedure Stage 1 dealt with by ACO and Stage 2 by the Fire Authority (or delegated body/person)</p>
<p>Regulation 165: Recovery of overpayment of benefits. Discretion to decide means of recovery of overpayment resulting from a percentage decrease in earnings in a revaluation order.</p>	<p>If, in a financial year, a percentage decrease in earnings is specified in an order made under section 9 of the Public Service Pensions Act 2013 ("revaluation"), the scheme manager shall recover any overpayment of benefits that has occurred as a result of the application of the retirement index adjustment for that year. The scheme manager can determine whether to recover the overpayment by reducing the amount of each instalment of pension until recovery is completed, or whether to omit to pay any increase in the amount of any pension due until the amount of overpayment is recovered.</p>	<p>Yes</p>	<p>Not previously included</p>
<p>Regulation 167(3): Commutation of small pensions. Discretion to commute.</p>	<p>If the pension entitlement of a member of the scheme, or the pension entitlement of a member's beneficiary, does not exceed the small pensions commutation maximum the scheme manager may pay the entitlement as a lump sum. This would, however, be subject to the consent of the</p>	<p>Yes</p>	<p>Where appropriate the Authority will allow the conversion of a small pension to a single lump sum in accordance with the financial limits set. Each case will be considered on an individual basis.</p>

	recipient and must comply with the commutation provisions that apply in the circumstances.		
Regulation 168: Discretion regarding payments for persons incapable of managing their affairs.	<p>If it appears to the scheme manager that a person, other than an eligible child, who is entitled to the payment of an award is, by reason of mental incapacity or otherwise, incapable of managing his/her affairs, the scheme manager may, in accordance with Regulation 168 of the Firefighters' Pension Scheme (England) Regulations 2014 and having regard to the circumstances of the case and medical guidance where appropriate, consider –</p> <p>(a) paying benefits or any part of them to a person having care of the person entitled, or such other person as the scheme manager may determine, after obtaining a written undertaking from that person that the benefits paid are to be applied for the benefit of the entitled person as the scheme manager may direct, or</p> <p>(b) applying the benefits in such manner as the scheme manager may determine for the benefit of the person entitled, or any beneficiaries of the person.</p>	Yes	The Authority will make the final decision as to the recipient to receive any sum payable to a person incapable of managing their own affairs.
Regulation 169: Payment of awards – discretion, following the death of a person, as to recipient(s) of sums less than the amount specified in the Administration of Estates (Small Payments) Act 1965.	Upon the death of a person to whom there was due a payment under the Firefighters' Pension Scheme (Wales) Regulations 2015 and before payment was made, if the total sum payable in respect of the deceased under the Scheme is (currently) less than £5,000 the scheme manager may make payment to the person(s) they deem appropriate without requiring the production of Grant of Probate or Letters of Administration.	Yes	When paying personal representatives death benefits, the Authority will consider each case on an individual basis.
Regulation 171(1), (2), (3), (4) and (5): Discretion as to forfeiture: offences committed by members, surviving partners or eligible children.	The scheme manager can consider using its powers to withdraw a pension in whole or in part, permanently or temporarily where a person entitled to a pension under the scheme has been convicted of a relevant offence as defined within Regulation 171, if the scheme manager decides it	Yes	When forfeiting a pension, the Authority will consider each case on an individual basis and details of full circumstances will be required.

	<p>appropriate according to the circumstances of any case which falls within the terms of Regulation 171 and subject to the certification of the Secretary of State where required.</p> <p>Where a pension is withheld, the scheme manager shall at any time, and to such extent and for such duration as they think fit, apply the pension for the benefit of any dependant of the member or restore it to the member.</p>	Yes	
Regulation 172(1) to (5): Forfeiture of pension in the event of murder and discretion as to forfeiture in the case of manslaughter.	<p>If a surviving partner or eligible child is convicted of the murder of the scheme member in respect of whom their benefits are payable, the scheme manager must withhold all of the pension otherwise payable to that person. However, if a surviving partner or eligible child is convicted of the manslaughter of the member, or any other offence, apart from murder, of which the unlawful killing of the member was an element, the scheme manager can use the discretion allowed under Regulation 172 to withhold all of the pension which exceeds any Guaranteed Minimum Pension to which the person is entitled under section 17 of the Pension Schemes Act 1993.</p> <p>(In the event that the convictions should be quashed, the scheme manager must reinstate the pensions with appropriate arrears until and unless there is any subsequent conviction as outlined in the paragraph above.)</p>	Yes	When forfeiting a pension, the Authority will consider each case on an individual basis and details of full circumstances will be required.
Regulations 174 and 176: Forfeiture: discretion to withhold benefits in respect of relevant monetary obligations and relevant monetary losses.	<p>If a scheme member has a relevant monetary obligation or has caused a relevant monetary loss, the scheme manager may to such extent and for such duration as they consider appropriate, withhold benefits payable to that person under the scheme. The monetary obligation must have been incurred to the scheme manager after the person became an active member and arising out of or connected with the scheme employment in respect of which the person became a member of the scheme, and it must have arisen out of the person's criminal, negligent or fraudulent act or omission. "Relevant monetary obligation" and "relevant monetary loss" are defined in the Regulation. There are certain limits,</p>	Yes	When forfeiting a pension, the Authority will consider each case on an individual basis and details of full circumstances will be required.

	<p>e.g. the amount withheld may only be that which exceeds the person's guaranteed minimum pension, and the scheme manager may only act if there is no dispute about the amount or, if there is, there is a court order or the award of an arbitrator.</p> <p>In accordance with Regulation 176, the scheme manager shall give the member a certificate showing the amount withheld and the effect on benefits under the scheme.</p>		
<p>Regulations 175 and 176: Discretion to set-off a relevant monetary obligation against a member's entitlement to benefits under the scheme.</p>	<p>In accordance with Regulation 175 of the Firefighters' Pension Scheme (Wales) 2015, if a scheme member has a relevant monetary obligation – as defined in the Regulations – to the scheme manager, the scheme manager may, according to the circumstances of the case, set off the monetary obligation against the member's entitlement to benefits under the scheme.</p> <p>There are certain limits, e.g. the amount withheld may only be that which exceeds the person's guaranteed minimum pension, certain transfer credits are protected, and the scheme manager may only act if there is no dispute about the amount or, if there is, there is a court order or the award of an arbitrator.</p> <p>In accordance with Regulation 176, the scheme manager shall give the member a certificate showing the amount withheld and the effect on the person's benefits.</p>	<p>Yes</p>	<p>Where the Authority proposes to withhold benefits, the procedure set out in Regulation will be followed. The Authority will consider each case on an individual basis.</p>
<p>Regulation 184: Discretion to request evidence of entitlement.</p>	<p>The scheme manager can use their discretion under Regulation 184 to require any person who is in receipt of a pension or who may have entitlement to a pension or lump sum under the Scheme to provide such supporting evidence as the scheme manager may reasonably require so as to establish the person's identity and their continuing or future entitlement to the payment of any amount under the scheme.</p>	<p>Yes</p>	<p>Not previously included</p>

	If a person fails to comply with the scheme manager's requirements in this respect, the scheme manager can withhold the whole or part of any amount that it otherwise considers to be payable under the scheme.	Yes	
(Schedule 1 Part 1, Paragraph 4) Added pension Amount of accrued added pension may not exceed overall limit of extra pension	The total amount of accrued added pension must not exceed a certain limit. If it appears to the scheme manager that a member who has elected to make periodical contributions will exceed the limit the scheme manager may cancel the election (by written notice to the member). [Schedule 1 Part 1, Paragraph 4]	Yes	Where it appears that a member who has elected to make periodical contributions will exceed the limit, it is likely that the Authority will cancel the election. Each case will be considered on an individual basis.
(Schedule 1 Part 1, Paragraph 7) Member's election to make periodical contributions for added pension	If a scheme member wishes to make periodical payments for added pension, the scheme manager can set a minimum amount which must be paid.	Yes	Where a Scheme Member wishes to make periodical payments for added pension, the Authority has set the minimum amount of £25 per month which must be paid.
SCHEDULE 1: Part 2, Paragraphs 6 to 11. Periodical payments for added pension. Discretion to set a minimum amount, to agree method of payment, and to extend time limit for payment.	The scheme manager shall administer an application from a member to make periodical payments for added pension. The scheme manager can use their discretion to set a minimum amount according to the circumstances of the case. The periodical payments will normally be payable by deduction from the member's pensionable pay during the periodical payment period but if the member does not wish to have this method of payment the scheme manager may agree another method of payment. If, after a period of assumed pensionable pay or reduced pay, the member wishes to authorise the scheme manager to deduct from pay the aggregate of payments which would have been made during this period, the payment must normally be made within 6 months of the end of the period of assumed or reduced pay. However, the scheme manager can use their discretion to extend the period if they are of the view that it would be appropriate in the circumstances.	Yes No Yes	Where a Scheme Member wishes to make periodical payments for added pension, the Authority has set the minimum amount of £25 which must be paid. The scheme manager will not allow a member to make periodical payments for added pension except by deduction from pensionable pay. Due to tax implications and the appropriate recording of contributions over a period of time The Authority will not extend the period of six months for payments during periods of assumed pensionable pay unless in exceptional circumstances.

<p>SCHEDULE 2: Part 1, Paragraph 3(3). Discretion to determine tapered protection date in some cases.</p>	<p>In accordance with Paragraph 3(3), the scheme manager can use their discretion to determine a tapered protection closing date for a tapered protection member of the Firefighters' Pension Scheme 2006 to whom Paragraphs 9(5) or 21 apply (members returning to pensionable service) according to the circumstances of the case.</p>	<p>No</p>	<p>Scheme Members were notified of their tapered protection dates at the time the 2015 scheme was introduced. The determination of taper dates is set out in regulations and this discretion will only apply until the remedy is put in place after the Sergeant ET determination.</p>
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Firefighters' Pension Scheme (Wales)2015

Authorised Delegations

A: The Fire and Rescue Authority or appropriate Committee under delegated powers.

B: The Chief Fire Officer or Assistant Chief Officer under delegated powers

C: The nominated officer or by Dyfed Pension Scheme as the provider of pension administration services to the Authority. This would be under delegated powers and in accordance with:

- the direction of the Fire and Rescue Authority for an individual case (Level A)
- the direction of a relevant Director (Level B).

Where a decision/action has to be taken at Levels B or C in respect of a person who would normally be the decision-maker at that level, the Level at which the decision/action will be taken will be “A”.

FIREFIGHTERS' PENSION SCHEME (Wales) 2015

Provision of Firefighter's Pension Scheme (Wales) 2015 (as amended)	Level of decision			Comments
	A	B	C	
Regulations 4A, 4B, 4C and 4D: Establishment of Local Pension Board.	✓			
Regulation 5: Delegation.	✓			
Regulation 16(2)(b): Opting out of the Scheme. Discretion to determine date at which pensionable service ceases			✓	Pensions/Payroll Teams
Regulation 17(1)(d): Discretion to determine that Continual Professional Development payments should be pensionable.	✓			

Regulation 19(c): Discretion to count absence as active membership of Scheme subject to payment of contributions.			✓	Pensions/Payroll Teams
Regulation 28: Establishment of pension accounts. Discretion to keep in form that the Fire and Rescue Authority consider appropriate.			✓	In conjunction with scheme administrators
Regulation 37 Closure and re-establishment of active member's account. Discretion to select appropriate account where more than one account held.			✓	In conjunction with scheme administrators
Regulation 49: Closure of deferred member's account after gap in pensionable service not exceeding 5 years. Discretion to select which account is to be closed where more than one is held.			✓	In conjunction with scheme administrators
Regulation 62: Employer initiated retirement. Discretion to award immediate payment of retirement pension without reduction.		✓		Delegated to CFO or FA in Principal Officers cases
Regulations 63 and 64: Exercise of partial retirement. Discretion as to date of commencement of partial retirement pension.			✓	In conjunction with HR Team
Regulation 68: Review of ill-health award or early payment of retirement pension. Discretion to select appropriate timing of review.			✓	In conjunction with scheme administrators
Regulation 69: Consequences of review		✓		
Regulation 70: Commencement of pensions. Discretion to determine date of commencement of payments.			✓	Pensions Team
Regulation 72: Allocation election. Discretion to withhold consent if Fire and Rescue Authority are not satisfied that nominated person is substantially dependent on the member.		✓		In conjunction with scheme administrators
Regulation 73: Making an allocation election. Discretion to refuse allocation request if not satisfied that member has normal life expectancy.		✓		In conjunction with scheme administrators
Regulation 75: Adjustment of allocated benefit. Discretion to adjust allocated benefits if member dies after reaching age 75.		✓		In conjunction with scheme administrators
Regulation 76: meaning of "surviving partner". Discretion to waive qualifying period for surviving partner's pension in the case of a cohabiting partner.		✓		In conjunction with scheme administrators
Regulation 85: Meaning of "eligible child". Discretion as to method of determining "permanent disablement" for a child's pension and for timing of review.		✓		In conjunction with scheme administrators
Regulation 95: Person to whom lump sum death benefits payable. Discretion of FRA to select recipients.		✓		In conjunction with scheme administrators
Regulation 100: Payment of pension in respect of an eligible child below age 18. Discretion relating to payment of child's pension.		✓		In conjunction with scheme administrators
Regulation 101: Surviving partner's pensions and eligible child's pensions. Discretion to suspend and recover.		✓		In conjunction with scheme administrators
Regulation 102: Provisional awards of eligible child's pensions. Discretion for later adjustment.		✓		In conjunction with scheme administrators

Regulation 104: Discretion to adjust benefits to comply with Finance Act 2004 where members die over age 75.		✓		In conjunction with scheme administrators
Regulation 110: Member contributions. Discretion to specify circumstances where a reduction in pensionable pay shall be disregarded for purposes of determining member contributions.			✓	Pensions/Payroll Teams
Regulation 111: Contributions during absence from work due to illness, injury, trade dispute or authorised absence. Discretion to require member to pay the employer's contribution in addition to the employee's contribution if absent from employment due to illness or injury without pay.			✓	Pensions/Payroll Teams
Regulation 114: Deduction and payment of contributions. Discretion to agree with member the method of payment of employee contributions.			✓	Pensions/Payroll Teams
Regulation 135: Statement of transfer value entitlement. Discretion to extend period in which guarantee date falls.			✓	Appropriate person Pension administrator
Regulation 141: Request for acceptance of a transfer payment. Discretion to extend time limit for request.		✓		In conjunction with scheme administrators
Regulations 142 and 144: Transfer statement and club transfer value statement. Discretion to require member to request manager of other pension scheme to provide statement of transfer value.			✓	Appropriate person Pension administrator
Regulation 152: Role of IQMP in determinations by the Fire and Rescue Authority.			✓	As per IHR Policy
Regulation 155: Notice of appeal (Board of Medical Referees).		✓		Head of HR/IHR Policy Owner
Regulation 157: Procedure where appeal to be pursued. Discretion to submit written evidence. Selection of attendee(s) representing the Fire and Rescue Authority at the interview.		✓		Head of HR/IHR Policy Owner
Regulation 161: Fees and allowances payable to the Board: expenses of each party. Discretion to require appellant to pay fees and allowances in certain circumstances.		✓		
Regulation 163: Appeals on other issues: requirement to deal with a person's disagreement by Internal Dispute Resolution Procedures ("IDRP"). Discretion to decide local IDRP arrangements.		✓		
Regulation 165: Recovery of overpayment of benefits. Discretion to decide means of recovery of overpayment resulting from a percentage decrease in earnings in a revaluation order.			✓	Pensions Teams in conjunction with administrators
Regulation 167: Commutation of small pensions. Discretion to commute.			✓	In conjunction with scheme administrators
Regulation 168: Discretion regarding payments for persons incapable of managing their affairs.		✓		In conjunction with scheme administrators

Regulation 169: Payment of awards – discretion, following death of a person, as to recipient(s) of sums less than the amount specified in the Administration of Estates (Small Payments) Act 1965.		✓		In conjunction with scheme administrators
Regulation 171: Discretion as to forfeiture: offences committed by members, surviving partners or eligible children.		✓		In conjunction with scheme administrators
Regulation 172: Forfeiture of pension in the event of murder and discretion as to forfeiture in the case of manslaughter.		✓		In conjunction with scheme administrators
Regulation 174 and 176: Forfeiture. Discretion to withhold benefits in respect of relevant monetary obligations and relevant monetary losses.		✓		In conjunction with scheme administrators
Regulation 175 and 176: Discretion to set-off a relevant monetary obligation against a member's entitlement to benefits under the Scheme.		✓		In conjunction with scheme administrators
Regulation 184: Discretion to request evidence of entitlement.			✓	In conjunction with scheme administrators
Schedule 1: Payments for added pension Part 1, Paragraph 4. Amount of accrued added pension may not exceed overall limit of extra pension			✓	In conjunction with scheme administrators
Schedule 1: Payments for added pension Part 1, Paragraph 7. Member's election to make periodical contributions for added pension			✓	In conjunction with scheme administrators
Schedule 1: Payments for added pension. Part 2, Paragraphs 6 to 11. Periodical payments for added pension. Discretion to set a minimum amount, to agree method of payment, and to extend time limit for payment.			✓	In conjunction with scheme administrators
Schedule 2: Part 1, Paragraph 3(3). Discretion to determine tapered protection date in some cases.	✓			

The Firefighters' Pension Scheme (Wales) 2007

Regulation	Explanation	Decision NW	Comments
Part 2 Rule 1(6) to (9) - Discretion to accept the status of “nominated partner” where the scheme member and partner had been in a relationship for less than 2 years.	Subject to the other requirements of nomination as set out in Part 2, Rule 1 of the Firefighters' Pension Scheme (Wales) 2007 having been met, the Fire and Rescue Authority have discretion to accept a scheme member's nomination of a partner before their relationship has continued for a period of two years.	Yes	Before giving consent to the allocation, it must be demonstrated to the satisfaction of the Authority that the nominee is a person substantially dependent on the member. Each case will be considered on an individual basis and full details of the circumstances will be required.
Part 3, Rule 5: Pension on member-initiated early retirement.	If a firefighter member, other than a special firefighter member, satisfies an eligibility condition, is awarded a deferred pension, and at age 55 or over but before normal benefit age (65) requests early payment by giving written notice to the Fire and Rescue Authority, the Authority have discretion to refuse the request if the pension as reduced by the appropriate amount of actuarial reduction is likely to be less than the guaranteed minimum pension that would be payable from State pensionable age.	Yes	The Authority may refuse a firefighter's request for early payment of a deferred pension where this is likely to be less than the GMP at State pensionable age. Each case will be considered on an individual basis.

<p>Part 3, Rule 6: Authority-initiated early retirement.</p>	<p>The Fire and Rescue Authority, having regard to the economical, effective and efficient management of their functions and the costs likely to be incurred in a particular case, can determine that a firefighter – other than a special firefighter member – who is at least age 55 but under normal retirement age (60) should be retired from the Authority's employment with immediate payment of a pension calculated on the same principles as an ordinary pension under Part 3, Rule 1 of the Firefighter's Pension Scheme (Wales) 2007.</p>	<p>Yes</p>	<p>The Authority will not normally grant early payment of benefits for business efficiency purposes or waive any actuarial reduction, except in exceptional circumstances, after considering the business case; agreement must be given by the Chief Fire Officer, in consultation with the Treasurer.</p> <p>This discretion allows the early payment of a pension to a Firefighter aged 55 or over where the retirement is in the interests of the management of the Service.</p>
<p>Part 3, Rule 7B: Discretion to determine that certain payments, not otherwise pensionable, should be treated as such for the credit of Additional Pension Benefit to the firefighter member.</p>	<p>The Fire and Rescue Authority have discretion to determine that the benefits referred to in Rule 7B (5) can be treated as pensionable for the credit to the firefighter of Additional Pension Benefit.</p> <p>(But note that in accordance with Part 11, Rule 1(6), where an allowance or supplement paid to a firefighter was being treated as pensionable before 1 July 2013 but is not pensionable pay within the meaning of Part 11, Rule 1(a), it shall continue to be treated as pensionable for so long as the firefighter continues to receive it without any break in payment.)</p>	<p>Yes</p>	<p>The Authority will treat CPD payments and Temporary Promotions as pensionable APBs.</p>

Part 3, Rule 10: Discretion to commute a small pension to a trivial commutation lump sum.	If the total amount of any pension(s) payable to a member who has attained State pensionable age, under Part 3 and, if relevant, under Part 6, Rule 1 (pension credit pension) of the Firefighters' Pension Scheme (Wales) 2007, together with any increase under the Pension (Increase) Act 1971, does not exceed the commutation limit for the purposes of Part 1 of Schedule 29 to the Finance Act 2004 (lump sum rule), the Fire and Rescue Authority can, if it is considered appropriate, commute the pension(s) to a lump sum in accordance with the guidance of the Scheme Actuary.	Yes	Where appropriate the Authority will allow the conversion of a small pension to a single lump sum in accordance with the financial limits set. Each case will be considered on an individual basis.
Part 3, (Rule 11, paragraphs 2(b) and 3) Discretion to permit a firefighter to allocate a portion of pension for a dependant other than a spouse, civil partner, or nominated partner.	The Fire and Rescue Authority can withhold consent for the allocation of a portion of pension for a person other than the member's spouse, civil partner or nominated partner if they are not satisfied that the person is substantially dependent on the firefighter member.	Yes	Where a portion of a pension has been allocated to a dependent who is not a spouse, civil partner or cohabiting partner of the member, the Authority will withhold the payment if they cannot be satisfied that the person nominated is substantially dependent on the member. Each case will be considered on an individual basis and full details of the circumstances will be required.
Part 3, (Rule 11, paragraph 6(a)) Requirement for, and acceptance of, an opinion as to normal life expectancy for allocation purposes.	If a member of the Firefighters' Pension Scheme 2007 wishes to allocate a portion of pension in favour of a beneficiary, that member must satisfy the Fire and Rescue Authority as to his/her normal life expectancy at the time of the request. There is no detail of how this should be done, e.g. a medical opinion from the firefighters' GP, or the Occupational Health Physician or IQMP, and so the Authority must decide their policy as to the method of proof.	Yes	Where a Firefighter elects to give up part of their pension (as per Part 3, Rule 11, Paragraphs 2(b) and 3), the Authority requires them to undertake a medical examination to ensure they are in good health before permitting them to do so. The Authority will refer the individual to the IQMP; the member will meet costs.

<p>Part 3, (Rule 12) Pension debit members</p>	<p>The Fire and Rescue Authority must provide pension valuations, and such information as may be required in relation to divorce or dissolution of civil partnership proceedings and will take appropriate steps to record and administer Attachment Orders. In the event of a Pension Sharing Order, the scheme member's pension rights will be apportioned in accordance with the directions of the Court, divorce/dissolution legislation, Part 3, Rule 12 of the Firefighters' Pension Scheme (Wales) 2007, and the guidance and factors prepared by the Scheme Actuary.</p> <p>The Authority may determine the charges to be made for administration.</p>	<p>Yes</p>	<p>Apply this discretion; the Authority will determine appropriate charges for this administration.</p>
<p>Part 4, Rule 1, paragraph 3: Discretion to withhold all or part of a survivor's pension, permanently or temporarily, where the deceased's spouse, civil partner, or nominated partner is convicted of manslaughter of the deceased.</p>	<p>The Fire and Rescue Authority have discretion to permanently withhold all of a spouse's, civil partner's or nominated partner's pension where that person is convicted of the manslaughter of the deceased.</p>	<p>Yes</p>	<p>Not previously included</p>
<p>Part 4 (Rule 5): Discretion, subject to request of surviving spouse, civil partner or nominated partner of a firefighter member, to commute their pension to a trivial commutation lump sum.</p>	<p>If the total amount of any pension payable to a surviving spouse, civil partner or nominated partner under the provisions of the Firefighters' Pension Scheme (Wales) 2007, does not exceed the commutation limit for the purposes of paragraph 20 of Schedule 29 to the Finance Act 2004 (lump sum death benefit) and if the recipient so requests, the Fire and Rescue Authority may commute the whole of the pension for a lump sum in accordance with factors prepared by the Scheme Actuary and in force at the time when the commutation takes effect.</p>	<p>Yes</p>	<p>The Authority may allow the conversion of a small pension to a single lump sum in accordance with the financial limits set. Each case will be considered on an individual basis.</p>

Part 4, Rule 7, paragraph 5: Discretion to withhold all or part of a child's pension, permanently or temporarily, where the child is convicted of manslaughter of the deceased.	The Fire and Rescue Authority may permanently withhold all or part of a child's pension, permanently or temporarily where the child is convicted of the manslaughter of the deceased.	Yes	Not previously included
Part 4, Rule 12: Discretion, subject to consent of child's remaining parent, guardian, or the child (if not a minor) to commute a child's pension to a trivial commutation lump sum.	If the total amount of a child's allowance payable under the provisions of the Firefighters' Pension Scheme (Wales) 2007 does not exceed the commutation limit for the purposes of paragraph 20 of Schedule 29 to the Finance Act 2004 and (a) the Fire and Rescue Authority are satisfied that there are sufficient reasons, and (b) a surviving parent or the child's guardian or – if neither – the child (if not a minor) consents, the Authority have discretion to commute the pension for a lump sum in accordance with the guidance of the Scheme Actuary at the time when the pension first becomes payable.	Yes	The Authority may allow the conversion of a small pension to a single lump sum in accordance with the financial limits set. Each case will be considered on an individual basis.
Part 5: Awards on death (Rules 1 and 2): Discretion as to recipient of death grant and post-retirement death grant.	Upon the death of a firefighter member or pensioner member, the Fire and Rescue Authority may pay a death grant assessed in accordance with Part 5, Rules 1 and 2 of the Firefighters' Pension Scheme (Wales) 2007 to such person or persons as the Authority think fit, in accordance with Part 5, Rule 1, paragraph 10.	Yes	The Authority will make the final decision as to the recipient for a post-retirement death grant as they feel appropriate. This discretion allows the Authority to decide who should receive a Death Grant.

<p>Part 5, Rule 1, paragraph 12: Discretion to pay part of any death grant not paid in full, to a person whose conviction for murder or manslaughter of the deceased has been quashed.</p>	<p>If a person's conviction for murder or manslaughter is quashed on appeal the Authority may, if the death grant has not at that time been paid in full and having regard to the circumstances of the case, pay part of it to the person whose conviction has been quashed.</p>	<p>Yes</p>	<p>Not previously included</p>
<p>Part 6: Pension sharing on divorce (Rule 2) Discretion, with the agreement of the pension credit member, to commute the whole of a pension credit pension to a trivial commutation lump sum.</p>	<p>In the circumstances described in regulation 3(2)(b) of the Pension Sharing (Pension Credit Benefit) Regulations 2000, if the total amount of a pension credit pension payable under the provisions of the Firefighters' Pension Scheme (Wales) 2007 does not exceed the commutation limit for the purposes of paragraph 20 of Schedule 29 to the Finance Act 2004 and</p> <p>a) the Fire and Rescue Authority are satisfied that there are sufficient reasons, and</p> <p>b) the pension credit member consents,</p> <p>the Authority can commute the pension for a lump sum calculated in accordance with factors provided by the Scheme Actuary current at the time of the commutation.</p>	<p>Yes</p>	<p>In the circumstances of divorce, the Authority may allow the conversion of a small pension to a single lump sum in accordance with the financial limits set. Each case will be considered on an individual basis.</p> <p>This discretion allows the commutation of a small pension into a lump sum in the circumstances of divorce. A small pension is defined in Paragraph 20 schedule 29 of the Finance Act 2004 as a lump sum which is not more than 1% of the standard lifetime allowance on the date the lump sum is paid.</p>

<p>Part 6, Rule 5, paragraph 2: Discretion to pay a post-retirement death grant in respect of a pension credit member to such person or persons as the Fire and Rescue Authority think fit.</p>	<p>If a pension credit member dies within five years of their entitlement to a pension credit pension coming into payment and before their 75th birthday and there is a difference between</p> <ul style="list-style-type: none"> the amount that is five times the pension, calculated at the annual rate effective on the day that it came into payment, and the instalments of pension that have been paid <p>the Fire and Rescue Authority can pay a post-retirement death grant of the amount of the difference to such person or persons as the Authority think fit.</p>	<p>Yes</p>	<p>The Authority will make the final decision as to the recipient for a post-retirement death grant as they feel appropriate.</p> <p>This discretion allows the consideration of who to pay a post-retirement Death Grant.</p>
<p>Part 8 (Rule 4, paragraph 4): Determination of questions and appeals 70. Discretion to extend time limit for an appeal against the Fire and Rescue Authority's decision based on medical advice.</p>	<p>If a person who wishes to appeal under Part 8, Rule 4 of the Firefighters' Pension Scheme (Wales) 2007 against a decision based on medical advice, fails to submit the appeal notice and any supporting documents within the 28 days permitted for lodging such an appeal, the Fire and Rescue Authority has discretion to extend the 28 day time limit.</p>	<p>Yes</p>	<p>Where an appeal is not made within the specified time limit and the Authority believe it is not due to the person's own default, the Authority will extend the time limit for appeal by a maximum of one month from the date of the original appeal deadline.</p> <p>This discretion allows the Authority to consider exceptions to the 28 day time limit for a Firefighter to submit an appeal.</p>

<p>Part 8, Rule 5: Requirement to deal with a person's disagreement by Internal Dispute Resolution Procedure arrangements set up by a Fire and Rescue Authority in accordance with the requirements of section 50 of the Pensions Act 1995, where the disagreement is in respect of an Authority's determination under Part 8, Rule 2 and the disagreement does not involve an issue of a medical nature.</p>	<p>The withdrawal of pension on re-employment is at the discretion of the Fire and Rescue Authority, however an Authority will normally have regard to the terms of Part 9, Rule 3, to the abatement principles set out in Firefighters' Pension Scheme Circular 10/2009, and to HM Treasury guidance, i.e. the pension due under the Firefighters' Pension Scheme 2007 plus remuneration from the new employment should not exceed the pensionable pay upon which the Firefighters' Pension Scheme 2007 pension was calculated (taking account of cost-of-living increases). To the extent that it does, so shall the Firefighters' Pension Scheme 2007 pension be reduced for the duration of the employment.</p>	<p>Yes</p>	<p>Where a firefighter has retired and been re-employed as a firefighter, their pension will be subject to abatement. The Service would always allow the individual to raise an issue of this nature through the Service IDR process.</p>
<p>Part 9, Rule 1, paragraph 1: Requirement to decide, at such intervals as a Fire and Rescue Authority think proper, whether a person under State pensionable age and in receipt of an ill-health pension for less than 10 years has become capable of carrying out any duty appropriate to the role from which he/she retired on health grounds, and of undertaking regular employment.</p>	<p>Although the review of ill-health awards is compulsory, the Fire and Rescue Authority can determine the timing of such reviews.</p>	<p>Yes</p>	<p>Not previously included</p> <p>As per current IHR Policy</p> <p>Written policy is required to include IHR process and review timelines</p>

<p>Part 9, Rule 1, paragraph 2 and Rule 2: Requirement to decide, at such intervals as a Fire and Rescue Authority think proper, whether a person under normal benefit age (65) who is in receipt of a deferred pension paid early on permanent disablement, has become capable of carrying out any duty appropriate to their former role, and of undertaking regular employment.</p>	<p>Although the review of early payment of deferred pension on health grounds is compulsory, the Fire and Rescue Authority can determine the timing of such reviews.</p>	<p>Yes</p>	<p>Not previously included</p> <p>As per current IHR Policy</p> <p>Written policy is required to include IHR process and review timelines</p>
<p>Part 9, Rule 3: Discretion to withdraw the whole or part of a Part 3 (personal awards) pension for any period during which the person entitled to it is again employed as a firefighter, or in any other capacity, by any Fire and Rescue Authority.</p>	<p>The withdrawal of pension on re-employment is at the discretion of the Fire and Rescue Authority, however an Authority will normally have regard to the terms of Part 9, Rule 3, to the abatement principles set out in Firefighters' Pension Scheme Circular 10/2009, and to HM Treasury guidance, i.e. the pension due under the Firefighters' Pension Scheme 2007 plus remuneration from the new employment should not exceed the pensionable pay upon which the Firefighters' Pension Scheme 2007 pension was calculated (taking account of cost-of-living increases). To the extent that it does, so shall the Firefighters' Pension Scheme 2007 pension be reduced for the duration of the employment.</p> <p>Account must also be taken of the Authority's obligation under Part 13, Rule 2, paragraph 11 of the Firefighters' Pension Scheme (Wales) 2007 which requires that a sum equivalent to the whole or part of pension <u>not</u> abated or withdrawn must be paid into the Firefighters' Pension Fund by the Authority in the financial year in which pension payment is made.</p>	<p>Yes</p>	<p>Not previously included</p> <p>This discretion allows consideration of withdrawing a Firefighter pension in payment if the person is re-employed as a regular Firefighter. This would require an abatement assessment.</p>

<p>Part 9, Rule 4: Discretion to disallow early payment of a deferred pension under Part 3, Rule 3, paragraph 4 because of firefighter's dismissal from a Fire and Rescue Authority's employment</p>	<p>The Fire and Rescue Authority have discretion to disallow payment of a deferred pension before age 65, or before age 60 in the case of a special retained member, to a firefighter who is dismissed from the Authority's employment if this is felt to be appropriate in a particular case.</p> <p>The reason for "dismissal" is not mentioned. The Authority may wish to consider a difference in treatment between dismissal because of an offence and dismissal because of medical capability (where the person would not be entitled to an ill-health award).</p>	<p>Yes</p>	<p>Not previously included</p> <p>Part 3, Rule 3, Paragraph 4 contains the power to pay a deferred pension early where a person is permanently disabled.</p> <p>This discretion allows consideration of not making such a payment where the Firefighter was dismissed.</p> <p>This will be considered on a case by case basis.</p>
<p>Part 9, (Rule 5, paragraphs 1 to 3) Discretion to withdraw pension in whole or in part, permanently or temporarily, on a person's conviction of certain offences.</p>	<p>The Fire and Rescue Authority have discretion to use the powers contained in Part 9, Rule 5, paragraphs 1 to 3 of the Firefighters' Pension Scheme (Wales) 2007 to withdraw a pension in whole or in part, permanently or temporarily where a pensioner has been convicted of an offence if the Authority decide it would be appropriate according to the circumstances of any case which falls within the terms of Part 9, Rule 5 and subject to the certification of the Secretary of State where required.</p>	<p>Yes</p>	<p>Where an individual is convicted for offences covered in Part 9 Rule 5, each case will be considered on an individual basis.</p>
<p>Part 9, Rule 5, paragraph 4: Discretion, at any time and to such extent as a Fire and Rescue Authority think fit, to restore a pension withdrawn under Part 9, Rule 5, paragraphs 1 to 3, or to apply it for the benefit of any dependant of the pensioner.</p>	<p>If the Fire and Rescue Authority withdraw a pension under Part 9, Rule 5, paragraphs 1 to 3 of the Firefighters' Pension Scheme (Wales) 2007, subject to the circumstances of the case they may consider applying it for the benefit of any dependant of the pensioner or restoring it to the pensioner.</p>	<p>Yes</p>	<p>The Authority may restore a pension withdrawn under Part 9, Rule 5 or apply it for the benefit of any dependent of the pensioner. Each case will be considered on an individual basis.</p> <p>This is the discretion to restore a pension withdrawn as in delegation above.</p>

Part 9, (Rule 6) Discretion to decide to what extent an award should be forfeited by a person who has been convicted of an offence under section 34(6) of the Fire and Rescue Services Act 2004 (acts or omissions for purposes of obtaining awards or other sums).	If a person has been convicted of an offence under section 34(6) of the Fire and Rescue Services Act 2004 (acts or omissions for purposes of obtaining awards or other sums) the Fire and Rescue Authority have discretion to require such amount of the pension to be forfeited as they think appropriate to the circumstances of the case.	Yes	The Authority will consider to what extent an award should be forfeited in the circumstances described in Part 9, Rule 6. Each case will be considered on an individual basis.
Part 10, Rule 4, paragraph 3: Discretion for a Fire and Rescue Authority to pay the employer's pension contributions (otherwise payable by the firefighter) due for a firefighter's unpaid period of absence where the firefighter gives notice that he/she wishes to pay contributions in order that the period may count as pensionable service or special pensionable service.	The Fire and Rescue Authority have discretion to meet the cost of employer's contributions during a period of unpaid leave.	Yes No	Not previously included For periods of an authorised unpaid absence or periods of absence resulting from a trade dispute the Scheme Manager will not pay the Employer Contributions, these must be paid by the Employee, in addition to the payment of Employee Contributions. ALL contributions must be paid in order for the Service to count towards retirement. For periods of absence due to illness or injury the Scheme Manager will pay the Employer Contributions, should the member wish to buy back this Service. In cases of Child related or Reserve Forces Service absences, the Employer MUST pay its contributions should the member wish to buy back these periods of absence.

Part 11 (Rule 3, paragraph 2) Discretion to deduct pension contributions from each instalment of pensionable pay as it becomes due (or by any other method of payment that may be agreed between a Fire and Rescue Authority and the member).	Contributions are normally deducted from instalments of pay but the Fire and Rescue Authority have discretion to collect the contributions due by other means should the need arise.	Yes	Each case will be considered on an individual basis.
Part 11, Rule 4, paragraph 3: Discretion to extend the time limit in which an election to pay pension contributions in respect of unpaid additional maternity, paternity or adoption leave must be made.	The Fire and Rescue Authority have discretion to permit an extension to the 30-day time limit for an election to pay contributions in respect of unpaid maternity, paternity or adoption leave which would not otherwise count as pensionable service or special pensionable service.	Yes	Not previously included
Part 11, Rule 4, paragraphs 6 and 7: Discretion to deduct contributions in respect of unpaid additional maternity, paternity or adoption leave from the death grant payable under Part 5 if a member or connected member dies without giving notice within the election time limit that he/she wishes to pay such contributions.	If a firefighter member would have had the option to pay contributions in order to reckon as pensionable service or special pensionable service a period of maternity, paternity or adoption leave but dies within the time limits for making such an election without having made it, he/she shall be deemed to have given the notice and the Fire and Rescue Authority must give the firefighter's personal representatives a statement of the contributions due, and may collect the contributions from the death grant payable under Part 5 of the Firefighters' Pension Scheme (Wales) 2007.	Yes	Not previously included This discretion allows the Authority to consider whether to treat as pensionable service a period of unpaid leave where the member dies without giving notice within the election time limit, they wish to pay such contributions.
Part 11, Rule 5, paragraph 5: Discretion to allow a part-time regular firefighter to pay contributions at a part-time rate to purchase additional service.	If a part-time regular firefighter member wishes to purchase additional service by periodical contributions the Fire and Rescue Authority have discretion to allow them to pay the additional contributions at a part-time rate.	Yes	Not previously included

Part 11, Rule 5, paragraph 6: Discretion to allow a retained or volunteer firefighter to purchase additional service by periodical contributions.	If a retained or volunteer firefighter member wishes to purchase additional service by periodical contributions the Fire and Rescue Authority have discretion to permit this, in which case the contributions are based on the firefighter's reference pay.	Yes	Not previously included
Part 11, Rule 5A: Purchase of service during the limited period.	<i>Discretions for estimation of service for duration of special retained firefighter exercise only.</i>	Yes	Not previously included
Part 11, Rule 8: Discretion to agree to a firefighter member's request to discontinue payment of additional contributions to purchase service provided this is solely on the grounds of the member's financial circumstances, and decision as regards timing of recommencement of payment of additional contributions to purchase service were agreed with member that discontinuance should be no greater than 6 months.	If it is felt to be appropriate in a particular case, the Fire and Rescue Authority have discretion to agree to discontinue the making of deductions of additional contributions to purchase service from the pay of a firefighter member, where the firefighter's request is made solely on the grounds of his/her financial circumstances.	Yes	Not previously included This discretion is to allow a Firefighter to cease making additional contributions.

Part 11, Rule 9, paragraph 4(c): The payment of contributions in respect of periods of unpaid service or absence, and discretion to extend the time limit in which the firefighter must pay.	<p>If a firefighter member who elected to pay additional contributions to “purchase” additional service has a period of unpaid service or unpaid leave (i.e. maternity, paternity, adoption leave or other absence without pay) and consequently there is no pay from which the additional contributions can be deducted, he/she can apply to the Fire and Rescue Authority to pay the contributions. The application must be made no later than one month after the end of the period of unpaid absence.</p> <p>The additional contributions may be paid directly to the Authority during the unpaid leave or collected within 6 months of the firefighter’s return to duty after the absence. The Authority have discretion to extend this time limit.</p>	Yes	Not previously included
Part 12, Chapter 2, Rule 3, paragraph 6: Discretion to charge member for third or subsequent statement of cash equivalent transfer value entitlement requested within any 12 month period.	Where, in any period of twelve consecutive months, a member has made and not withdrawn two applications for a statement of transfer value entitlement, the Fire and Rescue Authority have discretion not to supply a third or subsequent statement during that twelve-month period unless the applicant pays such fee as the Authority may reasonably require.	Yes	Not previously included
Part 12, Chapter 3, (Rule 9(1)(c)(ii)) Discretion to extend time limit in which a member, other than a special firefighter member, may apply for a transfer value payment from a non-occupational pension scheme.	The Fire and Rescue Authority have discretion to accept a scheme member’s application for a transfer value payment from a non-occupational pension scheme where the application is made more than one year after the member first became eligible to be a firefighter member.	No	<p>The Authority will not extend the one year time limit unless in extenuating circumstances, e.g. the Pension Administrator has not actioned the member’s request.</p> <p>Closed scheme</p>
Part 12, Chapter 3, Rule 10, paragraph 1, subject to paragraphs 3 and 4 and Part 10, Rule 2, paragraphs 2 and 3: Discretion to accept a transfer value.	The Fire and Rescue Authority have discretion to accept a transfer value payment into the Firefighters’ Pension Scheme 2007 where the Scheme member has made an application under Part 10 Rule 8.	Yes	Not previously included

Part 12, Chapter 5, Rule 14, paragraph 3: Discretion to extend 12-month time limit for acceptance of a "mis-selling" transfer value payment.	The Fire and Rescue Authority have discretion to permit the extension of the 12-month time limit for the acceptance of a "mis-selling" transfer value.	Yes	Not previously included
Part 12, Chapter 5, Rule 14, paragraph 6: Discretion to adjust "mis-selling" transfer value to take account of any earlier service credit.	The Fire and Rescue Authority have discretion to adjust the amount of transfer value they accept under the "mis-selling" transfer rules to ensure that there is no duplication of pensionable service credited.	Yes	Not previously included
Part 14, Rule 3, paragraph 2(a): Discretion to delay payment of an award to the extent necessary for determining any question as to a Fire and Rescue Authority's liability.	The Fire and Rescue Authority have discretion to delay payment of an award to the extent necessary for determining any question as to the Authority's liability.	Yes	Not previously included The Fire Authority need not pay the sum until they are satisfied as to the eligibility of an award.
Part 14, Rule 3, paragraph 2(b): Discretion to pay an award at other reasonable intervals if impracticable to pay at the standard monthly periods.	In accordance with Part 14, Rule 3, paragraph 1, if the Fire and Rescue Authority are of the opinion that, by reason of the amount of the award it would be impracticable to make payments monthly in arrears, they may exercise their discretion to discharge their liability in respect of it by making payments at such reasonable intervals as they think fit.	Yes	Not previously included
Part 14, Rule 3, paragraph 5: Discretion to recover all or part of an overpayment following a pensioner's death of which a Fire and Rescue Authority were not informed (possibly by making an off set against any other awards payable under the Firefighters' Pension Scheme 2007 in respect of the deceased).	Where the Fire and Rescue Authority are not informed of the death of a pensioner and, as a result, the pension has continued in payment, the Authority have discretion to recover all or part of the overpayment as they think fit and may recover it by off-set against any other award payable under the Firefighters' Pension Scheme (Wales) 2007 in respect of the deceased.	Yes	The Authority will recover any overpayments made following a pensioner's death in line with HM Treasury's 'Managing Public Money' guidance.

Part 14, Rule 3, paragraph 6: Repayment of aggregate contributions.	If a person is entitled under Part 3, Rule 8 of the Firefighters' Pension Scheme (Wales) 2007 to the repayment of aggregate pension contributions, the Fire and Rescue Authority are not obliged to make the payment until the expiration of a year from the date of retirement if the person does not make an earlier request for payment. They may wish to make a policy statement regarding this option.	Yes	Not previously included
Part 14, Rule 5, paragraph 1: Discretion as to recipient of any sum payable to a minor and directions as to application for the minor's benefit.	Administration Statement: Where children's benefits are payable, the Fire and Rescue Authority have discretion as to the recipient and may give directions regarding the application of the payments for a child's benefit.	Yes	Not previously included This discretion allows the payment of sums due to a minor to an appropriate person.
Part 14, Rule 5, paragraph 2: Discretion as to recipient, or application, of payments due to a person incapable of managing his/her own affairs.	If it appears to the Fire and Rescue Authority that a person entitled to the payment of an award is, by reason of mental disorder or otherwise, incapable of managing his/her affairs, the Authority may <ul style="list-style-type: none"> a) pay benefits or any part of them to a person having the care of the person entitled, or such other person as the Authority may determine, or b) apply the benefits in such manner as the Authority may determine for the benefit of the person entitled, or his/her dependants. 	Yes	Not previously included This discretion allows the consideration of payment of an award to an appropriate person where the recipient is deemed incapable of managing their affairs.
Part 14, Rule 6, paragraph 1: Discretion, following the death of a person, as to recipient(s) of sums less than the amount specified in the Administration of Estates (Small Payments) Act 1965.	Upon the death of a person to whom there was due, in respect of an award, a sum not exceeding (currently) £5,000, the Fire and Rescue Authority may pay the sum due to the person or persons as the Authority think fit without requiring production of Grant of Probate or any other proof of entitlement.	Yes	Not previously included This discretion deals with awards of less than £5,000 and allows decisions to be made of who should receive this amount.

<p>Part 14, (Rule 6, paragraphs 4 to 6) Discretion to withhold sums due in respect of an award to a firefighter where there has been a loss to the funds of the Fire and Rescue Authority as a result of fraud, theft, or negligence on the part of that person in connection with his/her employment.</p>	<p>If there has been a loss to the funds of the Fire and Rescue Authority as a result of fraud, theft, or negligence on the part of a firefighter in connection with his/her employment, the Authority can consider using the powers contained in Part 14, Rule 6 of the Firefighters' Pension Scheme (England/Wales) Order 2006/2007 to withhold all or part of any sums becoming due to him/her from the Authority in respect of an award. The total amount withheld must not exceed the amount of the loss nor any part of a sum due that is not attributable to service as an employee of a Fire and Rescue Authority. In the event of any dispute as to the amount of the loss, nothing must be withheld unless the loss has become recoverable from the person entitled to the award under the order of a competent court. The Authority must provide the person entitled to the award with a certificate showing the amount withheld.</p>	<p>Yes</p>	<p>The Authority will withhold sums due in respect of an award to a firefighter where there has been a loss to the funds of the Service as a result of fraud, theft, or negligence on the part of that person in connection with his/her employment.</p>
<p>Part 15, Rule 3: Discretion to require a person who is or may be entitled to a pension or a lump sum under the Firefighters' Pension Scheme 2007 to provide a Fire and Rescue Authority with supporting evidence as to identity and to continuing entitlement to any payment under the Scheme, and discretion to withhold the whole or part of any amount due where a person fails to comply with this requirement.</p>	<p>The Fire and Rescue Authority can require all persons in receipt of a pension or potentially entitled to a pension or lump sum under the Firefighters' Pension Scheme 2007 to provide supporting evidence from time to time as to identity an entitlement to payment under the Scheme. If a person fails to comply with this requirement, according to the circumstances of the case, the Authority can exercise their discretion to withhold the whole payment.</p>	<p>Yes</p>	<p>Not previously included</p>

Part 15, Rule 4: Decision as to date of issue of annual benefit statements and relevant date for the pension illustration.	The Fire and Rescue Authority can determine the timing of the issue of annual benefit statements. The Authority may also decide the relevant date for the pension illustration (except in the case of pension credit members).	No	No longer a discretion – all ABS must be published to members by the 31st August each year. This is now a statutory obligation.
Annex, 2, (paragraph 1(2)) Discretion to extend 28 day time limit, in which a person must lodge a medical appeal, to a period not exceeding 6 months. (paragraph 1(2))	The Fire and Rescue Authority has discretion to permit the extension of the 28-day time limit in which a person must lodge a medical appeal, to a period not exceeding 6 months from the date of issue of the documents under Part 8, Rule 4, paragraph 4 of the Firefighters' Pension Scheme (Wales) Order 2007.	Yes	Where an appeal is not made within the specified time limit and the Authority believe it is not due to the person's own default, the Authority will extend the time limit for appeal by a maximum of one month from the date of the original appeal deadline.
Annex 2, paragraph 6(5): Discretion to decide the Fire and Rescue Authority's representative at Medical Appeal Board interview.	The Fire and Rescue Authority can decide who should represent the Authority at a Medical Appeal Board interview.	Yes	Not previously included Delegated to the Head of HR
Annex 2, paragraph 7(1): Discretion to decide whether or not to submit written evidence or a written statement to Medical Appeal Board.	The Fire and Rescue Authority can decide whether or not to submit written evidence or a written statement to a Medical Appeal Board.	Yes	Not previously included Delegated to the Head of HR

<p>Annex 2, paragraph 10(2): Discretion, where Medical Appeal Board determines an appeal in favour of the Fire and Rescue Authority and states that, in its opinion, the appellant's appeal was "frivolous, vexatious or manifestly ill-founded", to require the appellant to pay to the Fire and Rescue Authority such sum as the Authority think fit, not exceeding the total amount of fees and allowances payable by the Authority to the Board under Annex 2, paragraph 9(1). (paragraph 10(2))</p>	<p>If the Medical Appeal Board decides an appeal in favour of the Fire and Rescue Authority and reports that in its opinion the appeal lodged by the appellant was frivolous, vexatious or manifestly ill-founded, the Authority can require the appellant to pay the Authority such sum as is equal to, but not greater than, the total amount of fees and allowances payable to the Board as determined by the Secretary of State. (See requirement to inform person of this possibility under Annex 2, paragraph 4(5)(i)).</p>	<p>Yes</p>	<p>Where a Medical Appeal Board decide that a person's appeal was 'frivolous, vexatious or manifestly ill-founded' the Authority will require the appellant to pay any sum they deem fit subject to capping as per the regulations.</p>
<p>Annex 2, (paragraph 10(3)) Discretion to require the appellant to pay to the Fire and Rescue Authority such sum as the Authority think fit, not exceeding the Medical Appeal Board's total amount of fees and allowances payable to the Board by the Authority under Annex 2, paragraph 9(1), in circumstances where the appellant gives notice to the Medical Appeal Board, withdrawing the appeal or requesting cancellation of, postponement of, or adjournment of, the date appointed for the medical examination less than 22 working days before the appointed date, or if the appellant's acts or omissions cause the Board to cancel, postpone or otherwise adjourn less than 22 days before the appointed date. (paragraph 10(3))</p>	<p>If the appellant withdraws an appeal or requests cancellation of, postponement of, or adjournment of the date appointed for an interview or medical examination by the Medical Appeal Board less than 22 working days before the appointed date, or if the appellant's acts or omissions cause the Board to cancel, postpone or otherwise adjourn the date appointed, the Fire and Rescue Authority has discretion to require the appellant to pay the Authority such sum as is equal to, but not greater than, the total amount of fees and allowances payable to the Board under Annex 2, paragraph 9(1) of the Firefighters' Pension Scheme (Wales) Order 2007.</p>	<p>Yes</p>	<p>Where an appellant withdraws their appeal less than 22 working days before the date appointed for interview or medical examination, the Authority will require the appellant to pay any sum they deem fit subject to capping as per the regulations.</p>

Firefighters' Pension Scheme (Wales) 2007

Authorised Delegations

A: The Fire and Rescue Authority or appropriate Committee under delegated powers.

B: The Chief Fire Officer or Assistant Chief Officer under delegated powers

C: The nominated officer or by Dyfed Pension Scheme as the provider of pension administration services to the Authority. This would be under delegated powers and in accordance with:

- the direction of the Fire and Rescue Authority for an individual case (Level A)
- the direction of a relevant Director (Level B).

Where a decision/action has to be taken at Levels B or C in respect of a person who would normally be the decision-maker at that level, the Level at which the decision/action will be taken will be "A".

FIREFIGHTERS' PENSION SCHEME (Wales) 2007

Provision of Firefighter's Pension Scheme (Wales) Order 2007 (as amended)	Level of decision			Comments
	A	B	C	
Part 2, Rule 1(6) to (9): Discretion to accept status of nominated partner where firefighter and partner in a relationship for less than 2 years.		✓		In conjunction with administrator
Part 3, Rule 5: Pension on member-initiated early retirement.			✓	
Part 3, Rule 6: Authority-initiated early retirement.	✓			Delegated to CFO
Part 3, Rule 7B: Discretion to determine that certain payments, not otherwise pensionable, should be treated as such for Additional Pension Benefits.			✓	Pension/Payroll Teams
Part 3, Rule 10: Discretion to commute a small pension to a trivial commutation lump sum.			✓	In conjunction with administrator
Part 3, Rule 11, paragraphs 2(b) and 3: Discretion to permit allocation of a portion of pension for a dependant other than a spouse, civil partner or nominated partner.		✓		In conjunction with administrator
Part 3, Rule 11, paragraph 6(a): Requirement for, and acceptance of, an opinion as to normal life expectancy for allocation.		✓		
Part 3, Rule 12: Awards to pension debit members.		✓		In conjunction with administrator
Part 4, Rule 1, paragraph 3: Discretion to withhold all or part of a survivor's pension where survivor convicted of manslaughter of the deceased firefighter.		✓		In conjunction with administrator
Part 4, Rule 5: Discretion to commute survivor's pension to a trivial commutation lump sum.			✓	In conjunction with administrator
Part 4, Rule 7, paragraph 5: Discretion to withhold all or part of a child's pension, where child is convicted of manslaughter of deceased firefighter.		✓		In conjunction with administrator
Part 4, Rule 12: Discretion to commute a child's pension to a trivial commutation lump sum.			✓	In conjunction with administrator
Part 5, Rules 1 and 2: Death grant and post-retirement death grant.		✓		In conjunction with administrator
Part 5, Rule 1, paragraph 12: Discretion to pay part of any death grant not paid in full, to a person whose conviction for murder or manslaughter of the deceased has been quashed.		✓		In conjunction with administrator
Part 6, Rule 2: Discretion to commute the whole of a pension credit pension to a trivial commutation lump sum.			✓	In conjunction with administrator
Part 6, Rule 5, paragraph 2: Discretion as to recipient of pension credit member's post-retirement death grant.		✓		In conjunction with administrator
Part 8, Rule 4, paragraph 4: Discretion to extend time limit for appeal against decision based on medical advice.		✓		Head of HR/IHR Policy Owner
Part 8, Rule 5: Internal Dispute Resolution Procedures.	✓			
Part 9, Rule 1, paragraph 1: Review of ill-health pension.			✓	Formal written IHR policy required
Part 9, Rule 1, paragraph 2, and Rule 2: Review of deferred pension paid early on ill-health grounds.			✓	Formal written IHR policy required

Part 9, Rule 3: Discretion to withdraw the whole or part of a pension during re-employment with a Fire and Rescue Authority.		✓		
Part 9, Rule 4: Discretion to disallow early payment of a deferred pension because of dismissal from employment.		✓		In conjunction with administrator
Part 9, Rule 5, paragraphs 1 to 3: Discretion to withdraw pension on a person's conviction of certain offences.		✓		In conjunction with administrator
Part 9, Rule 5, paragraph 4: Discretion to restore a withdrawn pension or to pay it for the benefit of a dependant.		✓		In conjunction with administrator
Part 9, Rule 6: Discretion to decide extent of forfeiture of award where person has been convicted of an offence under s34(6) of the Fire and Rescue Services Act 2004.		✓		In conjunction with administrator
Part 10, Rule 4, paragraph 3: Discretion for Fire and Rescue Authority to pay employer's contributions due for a period of unpaid absence.			✓	Pensions & Payroll Teams
Part 11, Rule 3, paragraph 2: Discretion to deduct contributions from instalments of pensionable pay.			✓	Pensions & Payroll Teams
Part 11, Rule 4, paragraph 3: Discretion to extend the time limit in which an election to pay contributions in respect of unpaid additional maternity, paternity, or adoption leave must be paid.			✓	Pensions & Payroll Teams
Part 11, Rule 4, paragraphs 6 and 7: Discretion to deduct contributions in respect of unpaid additional maternity, paternity or adoption leave from death grant if member dies without giving notice within election time limit that he/she wishes to pay.			✓	Pensions & Payroll Teams
Part 11, Rule 5, paragraphs 5 and 6: Discretions to allow a part-time regular firefighter, or a retained or volunteer firefighter member to purchase prorated additional service.			✓	Pensions & Payroll Teams
Part 11, Rule 5A: Purchase of service during limited period (special retained firefighters).			✓	Matthews 2 exercise only
Part 11, Rule 8: Discretion to agree to firefighter's request to discontinue payment of additional contributions to purchase service where payment is causing financial hardship; decision as to timing of recommencement of deductions.			✓	Pensions & Payroll Teams
Part 11, Rule 9, paragraph 4(c): Payment of contributions in respect of periods of unpaid service or absence, and discretion to extend time limit for election to pay contributions in respect of unpaid leave.			✓	Pensions & Payroll Teams
Part 12, Chapter 2, Rule 3, paragraph 6: Discretion to charge member for third or subsequent statement of cash equivalent transfer value entitlement within any 12 month period.		✓		In conjunction with administrator
Part 12, Chapter 3, Rule 9(1)(c)(ii): Discretion to extend time limit in which member may apply for a transfer value payment from a non-occupational pension scheme.			✓	In cases of maladministration only
Part 12, Chapter 3, Rule 10, paragraph 1, and paragraphs 3 and 4: Discretion to accept a transfer value.		✓		In conjunction with administrator

Part 12, Chapter 5, Rule 14, paragraph 3: Discretion to extend 12-month time limit for acceptance of a "mis-selling" transfer value payment.		✓		In conjunction with administrator
Part 12, Chapter 5, Rule 14, paragraph 6: Discretion to adjust "mis-selling" transfer value to take account of earlier service credit.		✓		In conjunction with administrator
Part 14, Rule 3, paragraph 2(a): Discretion to delay payment of award to the extent necessary for determining any question as to the Fire and Rescue Authority's liability.			✓	In conjunction with administrator
Part 14, Rule 3, paragraph 2(b): Discretion to pay an award at reasonable intervals other than standard monthly intervals.			✓	In conjunction with administrator
Part 14, Rule 3, paragraph 5: Discretion to recover all or part of an overpayment following a pensioner's death of which the Fire and Rescue Authority were not informed.			✓	In conjunction with administrator
Part 14, Rule 3, paragraph 6: Repayment of aggregate contributions.		✓		In conjunction with administrator
Part 14, Rule 5, paragraph 1: Discretion as to recipient of sum payable to a minor and directions as to application for minor's benefit.		✓		In conjunction with administrator
Part 14, Rule 5, paragraph 2: Discretion as to recipient, or application, of payments due to a person incapable of managing his/her own affairs.		✓		In conjunction with administrator
Part 14, Rule 6, paragraph 1: Discretion as to recipient(s) of sums less than the amount specified in the Administration of Estates (Small Payments) Act 1965.		✓		In conjunction with administrator
Part 14, Rule 6, paragraphs 4 to 6: Discretion to withhold sums due in respect of an award to a firefighter where there has been a loss to the funds of the Fire and Rescue Authority as a result of fraud, theft, or negligence on the part of that person in connection with his/her employment.		✓		In conjunction with administrator
Part 15, Rule 3: Discretion to require a person who is or may be entitled to a pension or lump sum under the Pension Scheme to provide the Fire and Rescue Authority with evidence as to identity and continuing entitlement under the Scheme; discretion to withhold payment where person fails to comply with this requirement.			✓	In conjunction with administrator
Part 15, Rule 4: Decision as to date of issue of annual benefit statements and relevant date for pension illustration - No longer a discretion - ABS must be published to members by the 31st August each year. This is now a statutory obligation.				No longer relevant
Annex 2, paragraph 1(2): Discretion to extend 28 day time limit for medical appeal (to a period not exceeding 6 months).		✓		Head of HR/ Policy owner
Annex 2, paragraph 6(5): Discretion to decide the Fire and Rescue Authority's representative at Medical Appeal Board interview.		✓		Head of HR/Policy owner
Annex 2, paragraph 7(1): Discretion whether or not to submit written evidence or statement to Medical Appeal Board.		✓		Head of HR/Policy owner
Annex 2, paragraph 10(2): Discretion, where Medical Appeal Board determines an appeal in favour of Fire and Rescue Authority and reports that in its opinion the appeal was frivolous, vexatious, or manifestly ill-founded, to require the appellant to pay the authority a sum not exceeding the total amount of fees and allowances payable to the Board.		✓		

Annex 2, paragraph 10(3): Discretion to require appellant to pay the authority a sum not exceeding the total amount of fees and allowances payable to the Board where appellant withdraws appeal or requests cancellation of, postponement of or adjournment of date for medical interview/examination less than 22 days before the appointed date, or where the appellant's acts or omissions cause the Board to cancel, postpone or adjourn less than 22 days before the appointed date.		✓		
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The Firefighters' Pension Scheme 1992

Regulation	Explanation	NW Decision	Comments
Rule B1(2)(b): Permission for a Chief Fire Officer, appointed on or before 1.7.2013, to retire before attaining age 55	In the event that a Fire and Rescue Authority's Chief Fire Officer, appointed on or before 1.7.2013, should retire before attaining age 55, the Fire and Rescue Authority must decide whether or not to grant permission for the immediate payment of retirement benefits under Rule B1 of the Firemen's Pension Scheme 1992.	Not relevant	Not previously included NW At time of approval CFO appointment date is post 1.7.2013
Rule B5C: Discretion to determine that certain payments, not otherwise pensionable, should be treated as such for the credit of Additional Pension Benefit to the firefighter member	<p>The Fire and Rescue Authority have discretion to determine whether any Continual Professional Development payment or increase in pay for temporary promotion which comes into effect on or after 1 July 2013 should be treated as pensionable for the credit to the firefighter of Additional Pension Benefit.</p> <p>(In accordance with Rule G1(9), where an allowance or supplement paid to a firefighter was being treated as pensionable before 1 July 2013 but is not pensionable pay within the meaning of Rule G1(1)(a), it should continue to be treated as pensionable for so long as the firefighter continues to receive it without any break in payment.)</p>	Yes	Not previously included It is recommended to consider each allowance or supplement on a case by case basis. <ul style="list-style-type: none"> • CPD – pensionable APB • Temporary promotion – pensionable APB • Other temporary pensionable allowances - APB

Rule B7 (5a) Consent for one quarter pension to be commuted in the case of a firefighter who, upon retirement, would otherwise not be permitted to commute such portion of pension as would provide a greater lump sum than two and a quarter times the full amount of pension	This proposal will allow employers the ability to permit those 1992 scheme members with less than 30 years' service and under age 55 years to commute the maximum of a quarter of their pension for a lump sum on retirement. Under the new provision, the employer would be liable for any additional cost which could be substantial should they exercise this discretion. A full business case would be needed demonstrating the economical, effective, and efficient management of its functions with associated costs.	No	The Authority will not normally consent to such requests.
Rule B8: Discretion to commute, for a "trivial commutation lump sum", a small pension payable to a firefighter pensioner.	This discretion allows the consideration of conversion of a small pension to a single lump sum payment and is governed by financial limits set by the Finance Act 2004.	Yes	Not previously included
Rule B9 (2b) Allocation of a portion of pension for a dependant other than a spouse or civil partner	Rule B9 allows a member of FPS to allocate (give up) part of their pension during their lifetime, when they first become eligible to retire, to provide, on their death, a pension for a spouse, civil partner, or a dependant.	Yes	Before giving consent to the allocation, it must be demonstrated to the satisfaction of the Authority that the nominee is a person substantially dependent on the member. The Authority will consider financial evidence over a period of two years.
Rule B9(6) Requirement for, and acceptance of, an opinion as to normal life expectancy for allocation purposes	<p>Where a Firefighter elects to give up part of their pension (under Rule B9), the Authority may require them to undertake a medical examination to ensure they are in good health before permitting them to do so. Rule B9 allows a member of FPS to allocate (give up) part of their pension during their lifetime, when they first become eligible to retire, to provide on their death a pension for a spouse, civil partner, or a dependant.</p> <p>This is a very old part of the FPS and has largely been replaced by better provision for spouse and civil partners, or dependants in the scheme. Rule B9(6) contains a requirement that the member has normal life expectancy, and this discretion allows consideration of whether that is so.</p>	Yes	<p>Where a Firefighter elects to give up part of their pension, the Authority requires them to undertake a medical examination to ensure they are in good health before permitting them to do so.</p> <p>The Authority will refer the individual to the IQMP and the member maybe required to meet any additional costs incurred by the Service.</p>

Rule B12 Pension debit members	The Fire and Rescue Authority must provide pension valuations, and such information as may be required in relation to divorce or dissolution of civil partnership proceedings and take appropriate steps to record and administer Attachment Orders. In the event of a Pension Sharing Order, the Scheme member's pension rights will be apportioned in accordance with the directions of the Court, divorce/dissolution legislation, Rule B12 of the Firemen's Pension Scheme 1992, and factors prepared by the Scheme Actuary. It is for the Authority to determine appropriate charges for this administration.	Yes	Apply this discretion; the Authority will determine appropriate charges for this administration.
Rule C8(6) - Discretion to increase level of spouse's or civil partner's award for such period as the Fire and Rescue Authority think fit where the firefighter and spouse or civil partner were living separately at the date of death and where the normal level of benefit is reduced accordingly under the rules of the Firemen's Pension Scheme 1992.	The Fire and Rescue Authority have discretion to permit the increase of a surviving spouse or civil partner's award or allow a pension gratuity to be paid in whole or in part where a benefit is reduced under the Firemen's Pension Scheme 1992 because the firefighter and spouse or civil partner were living separately at the date of death.	Yes	Apply this discretion on a case-by-case basis.
FPS 1992 Rule C8(7) -Discretion to allow a gratuity to be paid, in whole or in part, in circumstances where beneficiary and member were living separately at the time of death	The Fire and Rescue Authority have discretion to allow a gratuity to be paid in whole or in part to a surviving spouse or civil partner if the firefighter and spouse, or firefighter and civil partner, were living separately at the date of death.	Yes	Apply this discretion on a case-by-case basis.

<p>Rule D5(1) and (2): Cessation of payment of a child's pension.</p>	<p>Award of benefit to a child aged 17 or over who has had an interruption in whole-time education or vocational training.</p> <p>The FPS allows the payment of a child's pension when the child is in full time education. This provision allows the consideration of reinstatement of the pension when there has been an interruption in whole-time education or vocational training.</p> <p>In accordance with Rule D5(1) and (2) of the Firemen's Pension Scheme Order 1992, the Fire and Rescue Authority shall cease paying a child's pension when the child ceases to be eligible upon attaining a particular age, or ceasing full-time education and entering paid employment, or upon marriage or forming a civil partnership.</p>	<p>Yes</p>	<p>Reinstate benefits accordingly, once the Service is satisfied that the legislative requirements are met for payment of a child's pension.</p>
<p>Rule D5(3) and (9)(c): Determination of entitlement to a child's allowance for a child aged 18 or over who was dependent on the deceased by reason of permanent disablement; review of that award, and the action taken if the Fire and Rescue Authority are satisfied that the child is no longer permanently disabled.</p>	<p>There is no direction here as to how the child's disablement should be established and so the Fire and Rescue Authority will have to determine an appropriate policy, e.g. an opinion from an IQMP. The policy should also set out how and when the disablement should be reviewed.</p> <p>The award will cease to be payable if the Authority are satisfied that the child is no longer permanently disabled and not entitled to a child's allowance under any other terms of eligibility.</p>	<p>Yes</p>	<p>Not previously included</p> <p>The assessment of disablement should be undertaken by an IQMP appointed by the Scheme Manager</p>
<p>Rule D5(5) to (8): Discretion to withhold all or part of a child's pension, permanently or temporarily, where the child is convicted of manslaughter of the deceased.</p>	<p>The Fire and Rescue Authority may permanently withhold all of a child's pension where the child is convicted of the manslaughter of the deceased until and unless the conviction is quashed on appeal.</p>	<p>Yes</p>	<p>Not previously included</p>

Rule E3: Discretion to make an award of dependent relative's gratuity to a dependent relative who is not entitled to any other award under the Firemen's Pension Scheme 1992 in respect of the same firefighter.	Having regard to the conditions of Rule E3 of the Firemen's Pension Scheme 1992, the Fire and Rescue Authority can consider the payment of a dependent relative's gratuity to a dependent relative not entitled to any other award under the Firemen's Pension Scheme 1992 in respect of the same firefighter.	Yes	Not previously included
Rule E5 and E6 subject to limitations in Rule E7 – Discretion for commutation of dependant's pension	<p>If the total amount of any pension or child's allowance payable to a child, surviving spouse or civil partner under the provisions of the Firemen's Pension Scheme Order 1992, together with any increase under the Pensions (Increase) Act 1971, does not exceed the commutation limit for the purposes of Part 2 of Schedule 29 to the Finance Act 2004 (lump sum death benefit rules) or the "permitted amount" as defined in Rule E7(3), and</p> <p>(a) the deceased spouse or civil partner died before age 75, and</p> <p>(b) the Fire and Rescue Authority are satisfied that there are sufficient reasons, and</p> <p>(c) the surviving spouse or civil partner consents,</p> <p>the Fire and Rescue Authority have discretion to commute the whole of the surviving spouse's or civil partner's pension for a lump sum in accordance with the guidance of the Scheme Actuary at the time when the pension first becomes payable.</p>	Yes	<p>Consideration of commutation of a limited amount of a child, spouse, civil partner, or child's pension into a lump sum will be given in exceptional circumstances where financial hardship can be demonstrated. Each case will be considered on an individual basis.</p> <p>In normal circumstances the Service would not exercise this discretion. However, if raised by an individual and the circumstances are considered exceptional, the Scheme Manager would give consideration.</p>
Rule E9(6): Decision to substitute a higher amount of child's flat rate award where neither of the child's parents is alive.	In the exceptional circumstances that this issue should come up for consideration, the Fire and Rescue Authority have discretion to make such an award.	Yes	<p>Not previously included</p> <p>This discretion allows consideration of substitution of a higher amount than the child's flat rate when neither of the child's parents are alive.</p>

Rule F2(5): Discretion that the Fire and Rescue Authority should pay the employer's pension contributions (otherwise payable by the firefighter) due for a firefighters' period of absence without pay where the firefighter gives notice that he/she wishes to pay contributions in order that the period may count as pensionable service.	If the firefighter has given notice under Rule F2(3) that he/she wishes to pay contributions in order that a period of unpaid leave may count as pensionable service, the Fire and Rescue Authority can use their discretion under Rule F2(5) to pay the employer's contributions otherwise payable by the firefighter in addition to member contributions in these circumstances.	<p>Yes</p> <p>No</p>	<p>Not previously included</p> <p>For periods of an authorised unpaid absence or periods of absence resulting from a trade dispute the Scheme Manager will not pay the Employer Contributions, these must be paid by the Employee, in addition to the payment of Employee Contributions. ALL contributions must be paid in order for the Service to count towards retirement.</p> <p>For periods of absence due to illness or injury the Scheme Manager will pay the Employer Contributions, should the member wish to buy back this Service.</p> <p>In cases of Child related or Reserve Forces Service absences, the Employer MUST pay its contributions should the member wish to buy back these periods of absence.</p>
Rule F4(3)(c): Extension of 6-month time limit for election to pay certain sums in order that earlier pensionable service may count on rejoining the fire and rescue service.	The Fire and Rescue Authority have discretion to permit the extension of the 6-month time limit for an election to pay certain sums in order that earlier pensionable service may count upon a firefighter rejoining the fire and rescue service.	Yes	Not previously included

Rule F5(1): Discretion to extend period in which a firefighter may make a payment to count as pensionable service a period during which an injury award was payable.	If a firefighter is entitled under Rule F5 to pay to the Fire and Rescue Authority the amount required in accordance with Schedule 6, Part I, paragraph 1 of the Firemen's Pension Scheme 1992 in respect of a period during which the firefighter was entitled to receive an injury pension, in order that it may count as pensionable service on re-employment, the Authority have discretion to extend the period in which the election to pay and payment must be made (within six months of resuming service).	Yes	Not previously included This discretion allows consideration of an extension of the time limit for an election to pay for previous service where a Firefighter commences work with another Fire Authority after retiring without a pension.
Rule F6A(3)(b): Extension of 12-month time limit for acceptance of "mis-selling" transfer value payment.	The Fire and Rescue Authority have discretion to permit the extension of the 12-month time limit for the acceptance of a "mis-selling" transfer value.	Yes	Not previously included
Rule F6A (6): Discretion to adjust "mis-selling" transfer value to take account of any earlier service credit.	The Fire and Rescue Authority can use a discretion to adjust the amount of transfer value they accept under the "mis-selling" transfer rules to ensure that there is no duplication of pensionable service credited.	Yes	Not previously included
Rule F7(1) subject to Rule F7(2) and (3): Discretion to accept a transfer value.	The Fire and Rescue Authority have a discretion to accept a transfer value from a firefighter's previous pension scheme but, with the passage of time, it is unlikely that anyone would now satisfy the requirement that the written request to the Authority should be made no later than 12 months after the date of taking up employment with the Authority.	Yes	Not previously included

Rule F9(2): Extension of 6 month time limit for a former firefighter or serving firefighter who has opted out of the Firefighters' Pension Scheme 1992, to request payment of a transfer value to another pension scheme.	If a former firefighter or a serving firefighter who has opted out of the Firefighters' Pension Scheme 1992 becomes subject to another pension scheme and requests that the Fire and Rescue Authority should pay a transfer value to that other scheme, the written request must be made within 6 months of becoming subject to the other scheme. However, the Authority have discretion to extend this time limit.	Yes	Not previously included
Rule F9(5): Extension of 12-month time limit after leaving in which a former firefighter must be subject to a new scheme if a transfer value based upon a returned refund of pension contributions or gratuity is to be permitted.	If a former firefighter has received a refund of pension contributions or a gratuity under Part B of the Firemen's Pension Scheme 1992 and wishes to return the contributions/gratuity to reinstate pensionable service for the purposes of a transfer value to a new scheme, he/she must have become subject to that scheme within 12 months of ceasing to serve as a regular firefighter. The Fire and Rescue Authority have discretion to extend this 12-month time limit.	Yes	Not previously included This discretion allows consideration of the situation of a Firefighter who has received a gratuity or a refund of contributions requesting a transfer value instead. The refund of contributions or gratuity must also be paid back.
Rule G2(2): Discretion to deduct pension contributions from instalments of pensionable pay.	Contributions are normally deducted from instalments of pay but the Fire and Rescue Authority have discretion to collect the contributions due by other means should the need arise.	Yes	Not previously included
Rule G2A (3) - Discretion to extend 30-day time limit in which an election to pay contributions in respect of unpaid additional maternity, paternity or adoption leave must be made.	The Fire and Rescue Authority have discretion to permit the extension of the 30-day time limit (counting from the day on which the person returns to work or, if he/she does not return to work, from the last day of employment with the Authority) for an election to pay contributions in respect of maternity, paternity or adoption leave which would not otherwise count as pensionable service.	Yes	Late applications will be considered up to a maximum of 90 days.

Rule G6(4): Discretion not to accept a firefighter's election to purchase increased benefits through the payment of additional contributions unless the firefighter has undergone a medical examination at his/her own expense and satisfied the Fire and Rescue Authority as to his/her good health.	If a firefighter member of the Firefighters' Pension Scheme 1992 wishes to purchase increased benefits through the payment of additional contributions, the Fire and Rescue Authority have discretion to require the person to satisfy them as to his/her normal life expectancy at the time of the request by undergoing a medical examination at his/her own expense. If the Fire and Rescue Authority use this discretion they will have to give consideration as to the provider of the medical opinion, e.g. the firefighter's GP, or the Authority's Occupational Health Physician, or from an IQMP.	Yes	Not previously included This assessment would be undertaken by the IQMP appointed by the Scheme Manager
Rule G7(3): Discretion of Fire and Rescue Authority to agree to discontinuance of payment of periodical contributions for increased benefits where satisfied that payment is causing, or likely to cause, the firefighter financial hardship.	If the Fire and Rescue Authority are satisfied that the payment of periodical contributions for increased benefits is causing, or likely to cause, the firefighter financial hardship they may give consent to the discontinuance of payment for such period as they think fit.	Yes	Not previously included This discretion is to allow a Firefighter to cease making additional contributions.
Rule H2(4)(c): Discretion to extend the time limit for appeal against a Fire and Rescue Authority's decision based on a medical opinion.	If a person, who wishes to appeal under Rule H2 of the Firemen's Pension Scheme 1992 against a decision based on a medical opinion, fails to submit the appeal notice and any supporting documents within the 28 days permitted for lodging such an appeal, the Fire and Rescue Authority have discretion to extend the 28 days.	Yes	Not previously included

<p>Rule H3: Requirement to deal with a person's disagreement by Internal Dispute Resolution Procedure arrangements set up by the Fire and Rescue Authority in accordance with the requirements of section 50 of the Pensions Act 1995, where the disagreement is in respect of the Authority's determination under Rule H1, and the disagreement does not involve an issue of a medical nature.</p>	<p>The Fire and Rescue Authority must apply the requirements of Rule H3 of the Firemen's Pension Scheme 1992 and Section 50 of the Pensions Act 1995 with two-stage Internal Dispute Resolution Procedures. However, they have discretion to decide who the Stage One and Stage Two decision makers will be.</p>	<p>Yes</p>	<p>Not previously included</p> <p>Written IDRP policy detailing decision makers and panel members needs to be maintained and reviewed regularly.</p> <p>IDRP process and supporting documentation in line with WG regulations.</p>
<p>Part 1A: Pension credit members.</p>	<p>The Fire and Rescue Authority shall provide pension valuations, and such information as may be required in relation to divorce or dissolution of civil partnership proceedings and will take appropriate steps to record and administer Attachment Orders. In the event of Pension Sharing Orders, the Scheme member's pension rights will be apportioned in accordance with the directions of the Court, divorce/dissolution legislation, Rule B12 of the Firemen's Pension Scheme 1992, and factors provided by the Scheme Actuary; a pension credit member's pension entitlement will be administered in accordance with Part 1A.</p> <p>At the time that the pension credit pension becomes payable, the pension credit member will be informed of the commutation option and rights of appeal.</p> <p>The Authority can determine the charges to be made for administration.</p>	<p>Yes</p>	<p>Not previously included</p>
<p>Rule 1A2 (1) – Commutation of pension credit benefits</p>	<p>To commute the whole of a pension to which a pension credit member is entitled for a lump sum.</p>	<p>Yes</p>	<p>The Authority will consider each case on an individual basis.</p>

<p>Rule K1(1) and (2): Requirement to decide, at such intervals as a Fire and Rescue Authority think proper, whether a person under age 60 and in receipt of an ill-health pension for less than 10 years has become capable of carrying out any duty appropriate to the role from which he/she retired on health grounds and, in the case of a higher tier ill-health pension, whether that person has become capable of undertaking regular employment.</p>	<p>Although there is a requirement to review entitlement to an ill-health pension in accordance with this Rule, the Fire and Rescue Authority can decide at what intervals the pension should be reviewed.</p> <p>Review of deferred pensions paid early on ground of ill health are also included here.</p>	<p>Yes</p>	<p>Not previously included</p> <p>Requirement to review ill health pensions under 10 years of retirement.</p> <p>IHR formal written policy required setting out timelines for review and IHR process</p>
<p>Rule K3(1): Discretion to reduce the level of an ill-health pension to not less than half of the full amount where firefighter contributed to infirmity by own default.</p>	<p>The Fire and Rescue Authority can consider using the powers contained in Rule K3 of the Firemen's Pension Scheme 1992 to reduce an ill-health award where the firefighter is permanently disabled and has brought about or contributed to the infirmity by his/her own default if they feel it appropriate according to the circumstances of any case which falls within the terms of Rule K3.</p> <p>The amount of the reduced pension would be increased to the level of a notional deferred pension when the person attains age 60.</p>	<p>Yes</p>	<p>The Authority will consider each case on an individual basis.</p> <p>This discretion permits the reduction of a Firefighter pension to not less than half the amount due where it is considered that they have contributed to an infirmity by their default.</p>

Rule K4 Withdrawal of a pension whilst employed by a fire and rescue authority (abatement)	To amend the 1992 scheme to widen the employers discretion to abate a pension paid to a member who is reemployed in any role by any fire and rescue authority; and to require the employer that is paying the pension to pay into the pension fund the amount of pension that is paid that could have been subject to abatement under the scheme rules. The requirement for the employer to be liable for the costs where they do not exercise the discretion to abate a members' pension would apply to both the 1992 and 2007 schemes. Amendment Order 2013 requires the employer to reimburse the pension fund in the instance where they do not exercise the discretion to abate a member's pension on re-employment.	Yes	<p>The abatement of pension, on a £ for £ basis, will apply where earnings plus pension payments in the new role exceed earnings in the previous role.</p> <p>This discretion allows abatement of a pension where the employee has been re-employed, as per the regulations, and an abatement assessment would need to be formally undertaken.</p>
Rule K5(1): Discretion to withdraw a pension in whole or in part, permanently or temporarily, on a person's conviction of certain offences.	<p>The Fire and Rescue Authority have discretion to use powers contained in Rule K5 of the Firemen's Pension Scheme 1992 to withdraw a pension in whole or in part where a pensioner has been convicted of an offence (in the case of a spouse or civil partner this means an offence committed <u>after</u> the death of the member) if they feel it appropriate according to the circumstances of any case which falls within the terms of Rule K5 and subject to the certification of the Secretary of State where required.</p> <p>The offences include those which are considered to have been gravely injurious to the interests of the State (including the offence of treason or an offence under the Official Secrets Acts 1911 to 1989) or liable to lead to serious loss of confidence in the public service.</p>	Yes	<p>Not previously included</p> <p>This discretion only applies in the case of treason or a serious offence under the Official Secrets Act.</p>
Rule K5(5): Discretion to restore, at any time and to such extent as the Fire and Rescue Authority think fit, a pension withdrawn under Rule K5(1) to the pensioner or to apply it for the benefit of any dependant of the pensioner.	If the Fire and Rescue Authority withdraw a pension under Rule K5(1) of the Firemen's Pension Scheme 1992, subject to the circumstances of the case they may at any time, and to such extent as they think fit, consider applying it for the benefit of any dependant of the pensioner or restoring it to the pensioner.	Yes	<p>Not previously included</p> <p>This discretion allows consideration of the reinstatement of the pension withdrawn as a result of a decision in Rule K5(1).</p>

Rule L3(1): Determination of intervals at which instalments of pension or allowance shall be paid.	<p>The Fire and Rescue Authority have discretion to determine the intervals at which instalments of pension or allowance should be paid.</p> <p>(There is no longer a requirement to pay in advance.)</p>	Yes	<p>Not previously included</p> <p>This discretion allows the arrangement of normal monthly payments of annual pension, or should the need arise, at other intervals the Scheme Manager sees fit.</p>
Rule L3(1): Discretion to delay payment of an award to the extent necessary for determining any question as to the Fire and Rescue Authority's liability.	The Fire and Rescue Authority can use their discretion under Rule L3(1) of the Firemen's Pension Scheme 1992 to delay payment of an award to the extent necessary for determining any question as to their liability.	Yes	<p>Not previously included</p> <p>This discretion allows the Fire Authority to delay the payment of an award sum until they are satisfied as to the eligibility of an award.</p>
Rule L3(7) and (8): Discretion to decide an earlier payment date for survivors' benefits than the date prescribed (the first anniversary of the date of death) where the deceased received a gratuity or lump sum, and an option to pay a gratuity in instalments rather than as a single lump sum.	The Fire and Rescue Authority have discretion to determine the payment date and discretion as to payment in the above circumstances.	Yes	<p>Not previously included</p> <p>This discretion allows consideration of earlier payment of survivor benefits which are normally paid one year after the date the member deceased. There is also the option to pay a smaller amount in regular instalments where this would be of advantage to the person entitled.</p>
Rule L3(9): Repayment of aggregate pension contributions.	If a person is entitled under Rule B6 of the Firemen's Pension Scheme 1992 to the repayment of aggregate pension contributions, the Fire and Rescue Authority are not obliged to make the payment until one year from the date of the person's retirement unless the person makes an earlier request for payment, or the Authority use their discretion to make an earlier payment.	Yes	Not previously included

Rule L5(1): Payment of awards – minors.	The Fire and Rescue Authority may, at their discretion and as they think fit, pay a minor's pension to such other person as they may determine. They may give directions to that person as to the application of the pension for the minor's benefits.	Yes	Not previously included This discretion allows the payment of any sum due to a minor to any appropriate person. This will be determined on a case by case basis.
Rule L5(2): Payment of awards – discretion as to recipient, or application, of payments due to a person incapable of managing his/her own affairs.	If it appears to the Fire and Rescue Authority that a person entitled to the payment of an award is, by reason of mental disorder or otherwise, incapable of managing his/her affairs, the Authority may use their discretion to: <ul style="list-style-type: none"> a) pay the benefits or any part of them to a person having care of the person entitled, or such other person as the Authority may determine, or b) apply the benefits in such manner as the Authority may determine for the benefit of the person entitled, or his/her dependants. 	Yes	Not previously included This discretion allows the consideration of payment of an award to an appropriate person where the recipient is deemed to be incapable of managing their affairs or in a manner that is determined as being in the best interests of the individual.
Rule L5(3): Payment of awards – discretion, following death of a person, as to recipient(s) of sums less than amount specified in the Administration of Estates (Small Payments) Act 1965.	Upon the death of a person to whom there was due an award and before the award was paid, the Fire and Rescue Authority have discretion as to the recipient of the sum due if it is less than the amount specified in the Administration of Estates (Small Payments) Act 1965 (currently £5,000).	Yes	Not previously included This discretion deals with awards of less than £5,000 and enables the Scheme Manager to decide who should receive this amount.
Rule L5 (6) to (9): Withholding of pension in cases of fraud, theft, or negligence	To withhold all or part of any payments due to a firefighter in respect of pension where there has been fraud, theft, or negligence on the part of the firefighter in connection with their employment resulting in loss to the funds of the Authority.	Yes	The Authority will consider each case on an individual basis. This discretion allows the Authority to reclaim sums lost as a result of fraud, theft, or negligence on the part of that person in connection with their employment.

Schedule 6, Part 1, paragraph 1(4): Discretion to deduct from an award any outstanding balance of payments in respect of previous service.	In the event that any firefighter member still has payments in respect of previous service outstanding at the time of retirement, the Fire and Rescue Authority have discretion to deduct the outstanding amount from the payments of award made to him/her.	Yes	Not previously included This discretion relates to where a member has elected to pay additional sums in respect of previous pension service and then retires before completing the payments. The scheme provides that they will receive a pension as if they have completed the payments. This discretion allows the recovery of the payments not made.
Schedule 9, Part I, paragraph 1(2): Discretion to extend 28-day time limit in which a person must lodge any medical appeal, to a period not exceeding 6 months from the date of issue of the documents referred to in Rule H2(4) to that person, provided the Fire and Rescue Authority are of the opinion that the person's failure to lodge the appeal within 28 days was not due to his/her own default.	The Fire and Rescue Authority have discretion to extend the period for lodging a medical appeal, as outlined above.	Yes	Not previously included Delegated to Head of HR
Schedule 9, Part 1, paragraph 4(5): Discretion to decide the Fire and Rescue Authority's representation at a Medical Appeal Board interview.	Discretion to decide the Fire and Rescue Authority's representation at a Medical Appeal Board interview.	Yes	Not previously included Delegated to Head of HR

<p>Schedule 9, Part 1, paragraph 5: Discretion to decide whether or not to submit written evidence or a written statement to a Medical Appeal Board.</p>	<p>The Fire and Rescue Authority can decide whether or not to submit written evidence or a written statement to a Medical Appeal Board.</p>	<p>Yes</p>	<p>Not previously included</p> <p>This discretion allows consideration of whether to present written evidence to a Medical Appeal Board. In practice this is always done.</p> <p>Delegated to Head of HR</p>
<p>Schedule 9, Part 1, paragraph 8(2): Discretion, where Medical Appeal Board decides an appeal in favour of the Fire and Rescue Authority and reports that in its opinion the appeal was frivolous, vexatious or manifestly ill-founded, to require the appellant to pay to the Authority such sum as the Authority think fit, not exceeding the total amount of fees and allowances payable to the Board as determined by the Secretary of State.</p>	<p>If the Medical Appeal Board decides an appeal in favour of the Fire and Rescue Authority and reports that in its opinion the appeal lodged by the appellant was frivolous, vexatious or manifestly ill-founded, the Authority have discretion to require the appellant to pay the Authority such sum as is equal to, but not greater than, the total amount of fees and allowances payable to the Board under Schedule 9, Part 1, paragraph 7(1) of the Firemen's Pension Scheme 1992 as determined by the Secretary of State.</p>	<p>Yes</p>	<p>Not previously included</p>

<p>Schedule 9, Part 1, paragraph 8(2A): A Fire and Rescue Authority's discretion to require the appellant to pay the Authority a sum not exceeding the total amount of fees and allowances payable to the Board, where the appellant withdraws an appeal or requests cancellation of, postponement of, or adjournment of the date appointed for an interview or medical examination by the Medical Appeal Board less than 22 working days before the appointed date, or the appellant's acts or omissions cause the Board to cancel, postpone or otherwise adjourn less than 22 working days before the appointed date.</p>	<p>If the appellant withdraws an appeal or requests cancellation of, postponement of, or adjournment of the date appointed for an interview or medical examination by the Medical Appeal Board less than 22 working days before the appointed date, or if the appellant's acts or omissions cause the Board to cancel, postpone or otherwise adjourn the date appointed under Schedule 9, Part 1, paragraph 4(2) of the Firemen's Pension Scheme 1992 for the interview less than 22 working days before the date so appointed, the Fire and Rescue Authority have discretion to require the appellant to pay the Authority such sum as is equal to, but not greater than, the total amount of fees and allowances payable to the Board.</p>	<p>Yes</p>	<p>Not previously included</p>
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Firefighters' Pension Scheme 1992

Authorised Delegations

A: The Fire and Rescue Authority or appropriate Committee under delegated powers.

B: The Chief Fire Officer or Assistant Chief Officer under delegated powers

C: The nominated officer or by Dyfed Pension Scheme as the provider of pension administration services to the Authority. This would be under delegated powers and in accordance with:

- the direction of the Fire and Rescue Authority for an individual case (Level A)
- the direction of a relevant Director (Level B).

Where a decision/action has to be taken at Levels B or C in respect of a person who would normally be the decision-maker at that level, the Level at which the decision/action will be taken will be "A".

FIREFIGHTERS' PENSION SCHEME 1992

Provision of Firemen's Pension Scheme 1992 (as amended)	Level of decision			Comments
	A	B	C	No longer relevant
Rule B1(2)(b): Permission for Chief Fire Officer, appointed on or before 1.7.2013, to retire before attaining age 55.	✓			No longer relevant
Rule B5C: Pensionable status of payments, not otherwise pensionable, for Additional Pension Benefits. From 1 st July 2013			✓	Pension/Payroll Teams
Rule B7(5A): Consent for one quarter commutation where not otherwise permitted by Scheme rules.	✓			
Rule B8: Discretion to commute, for a "trivial commutation lump sum" a small pension payable to a firefighter pensioner.			✓	In conjunction with administrators
Rule B9(2)(b): Discretion to permit allocation for a dependant other than a spouse or civil partner.		✓		In conjunction with administrators
Rule B9(6): Proof of life expectancy for allocation purposes.		✓		In conjunction with administrators
Rule B12: Pension debit members.		✓		In conjunction with administrators
Rule C8(6): Discretion to increase award to surviving spouse/civil partner were living apart from firefighter at date of death.		✓		In conjunction with administrators
Rule C8(7): Discretion to pay a gratuity to surviving spouse/civil partner were living apart from firefighter at date of death.		✓		In conjunction with administrators
Rule D5(1) and (2): Cessation of payment of a child's pension.		✓		In conjunction with administrators
Rule D5(3) and (9)(c): Review of disabled child's pension.		✓		In conjunction with administrators
Rule D5(5) to (8): Withholding of child's pension on conviction of manslaughter of the deceased firefighter.		✓		In conjunction with administrators
Rule E3: Discretion to make payment of a dependent relative's gratuity to a dependent relative not entitled to any other award		✓		In conjunction with administrators
Rules E5 and E6: Discretion to commute a surviving spouse's/civil partner's pension of limited amount, for a lump sum.			✓	In conjunction with administrators
Rule E6, Rule E7, Schedule 5 Part III: Discretion to commute a child's pension of limited amount, for a lump sum.			✓	In conjunction with administrators
Rule E9(6): Decision to substitute a higher amount of a child's flat rate award where neither of child's parents is alive.		✓		In conjunction with administrators
Rule F2(5): Discretion for Fire and Rescue Authority to pay employer's contribution during a period of absence.			✓	Pension/Payroll Teams
Rule F4(3)(c): Discretion to extend 6-month time limit for election to make payment to count earlier service on rejoining.			✓	Pension/Payroll Teams
Rule F5(1): Discretion to extend 6-month time limit for election to make payment to count period during which injury award was paid.			✓	In conjunction with administrators
Rule F6A(3)(b): Extension of 12-month time limit for acceptance of "mis-selling" transfer value payment.		✓		In conjunction with administrators

F6A (6): Discretion to adjust "mis-selling" transfer value to take account of any earlier service credit.		✓		In conjunction with administrators
Rule F7(1), Rule F7(2) and (3): Discretion to accept a transfer value.		✓		No longer relevant
Rule F9(2): Extension of time limit in which a request for a transfer value payment to another pension scheme must be made.		✓		In conjunction with administrators
Rule F9(5): Extension of time limit in which a request for a transfer payment based upon a returned refund of pension contributions or gratuity must be made.		✓		In conjunction with administrators
Rule G2(2): Discretion to deduct contributions from instalments of pensionable pay.			✓	Pensions/Payroll Teams
Rule G2A (3): Discretion to extend 30-day time limit in which an election to pay additional maternity, paternity or adoption leave contributions must be made.			✓	Pensions/Payroll Teams
Rule G6(4): Discretion not to accept election to purchase increased benefits unless firefighter demonstrates good health.		✓		
Rule G7(3): Discretion to agree that a firefighter who has elected to purchase increased benefits should discontinue payment on grounds of financial hardship.			✓	Pensions/Payroll Teams
Rule H2(4)(c): Discretion to extend the time limit for appeal against Fire and Rescue Authority's decision based on a medical opinion.		✓		Head of HR/IHR policy owner
Rule H3: Internal Dispute Resolution Procedures.		✓		As per IDRP policy
Part IA: Pension entitlement for pension credit members.		✓		In conjunction with administrators
Part IA2(1): Discretion to commute a small pension due to a pension credit member.			✓	In conjunction with administrators
Rule K1(1) and (2): Review of ill-health pensions.			✓	As per IHR Policy
Rule K3(1): Discretion to reduce ill-health pension where firefighter contributed to infirmity by own default.		✓		In conjunction with administrators
Rule K4: Discretion to withdraw the whole or part of a pension during a period of re-employment with a Fire and Rescue Authority.			✓	In conjunction with administrators
Rule K5(1): Discretion to withdraw pension on a person's conviction of certain offences.		✓		In conjunction with administrators
Rule K5(5): Discretion to restore a pension withdrawn under Rule K5(1).		✓		In conjunction with administrators
Rule L3(1): Determination of intervals at which instalments of pension or allowance shall be paid.			✓	In conjunction with administrators
Rule L3(1): Discretion to delay payment of an award to the extent necessary for determining any question as to the Fire and Rescue Authority's liability.			✓	In conjunction with administrators
Rule L3(7) and (8): Discretion to decide earlier payment date for survivor's benefits where the deceased received a gratuity or lump sum, and an option to pay a gratuity in instalments rather than as a single lump sum.			✓	In conjunction with administrators
Rule L3(9): Repayment of aggregate pension contributions.			✓	In conjunction with administrators
Rule L5(1): Payment of awards – children.		✓		In conjunction with administrators
Rule L5(2): Payment of awards – person incapable of managing his/her own affairs.		✓		In conjunction with administrators

Rule L5(3): Payment of awards – discretion as to recipients of sums less than amount specified in the Administration of Estates (Small Payments) Act 1965.		✓		In conjunction with administrators
Rule L5(6) to (9): Payment of awards – discretion to withhold sums where there has been a loss to the funds of the Fire and Rescue Authority as a result of fraud, theft, or negligence on the part of the person in connection with his/her employment.		✓		In conjunction with administrators
Schedule 6, Part 1, paragraph 1(4): Discretion to deduct from award any outstanding balance of payments in respect of previous service.			✓	In conjunction with administrators
Schedule 9, Part 1, paragraph 1(2): Discretion to extend time limit for medical appeal.		✓		Head of HR/IHR Policy Owner
Schedule 9, Part 1, paragraph 4(5): Discretion to decide the Fire and Rescue Authority's representation at Medical Appeal Board.		✓		Head of HR/IHR Policy Owner
Schedule 9, Part 1, paragraph 5: Discretion to decide whether or not to submit written evidence or written statement to Medical Appeal Board.		✓		Head of HR/IHR Policy Owner
Schedule 9, Part 1, paragraph 8(2): Discretion, where Medical Appeal Board decides an appeal in favour of Fire and Rescue Authority and reports that in its opinion the appeal was frivolous, vexatious or manifestly ill-founded, to require the appellant to pay the authority a sum not exceeding the total amount of fees and allowances payable to the Board.		✓		
Schedule 9, Part 1, paragraph 8(2A): Discretion to require appellant to pay the authority a sum not exceeding the total amount of fees and allowances payable to the Board where appellant withdraws appeal or requests cancellation of postponement of, or adjournment of, date for medical interview/examination less than 22 days before the appointed date, or where the appellant's acts or omissions cause the Board to cancel, postpone or adjourn less than 22 days before the appointed date.		✓		

Report to	North Wales Fire and Rescue Authority
Date	21 July 2025
Lead Officer	Helen MacArthur, Assistant Chief Fire Officer Finance and Resources
Subject	Firefighters Pension Schemes Local Pension Board – Annual Report 2024/25



PURPOSE OF REPORT

- 1 To present to Members of the North Wales Fire and Rescue Authority (the Authority) the annual report of the Local Pension Board (the Board) which details the work undertaken during the 2024/25 financial year. The annual report is attached at appendix 1.

EXECUTIVE SUMMARY

- 2 The annual report of the Local Pension Board details the work undertaken by the Board during 2024/25 and provides a work programme for 2025/26.

OBSERVATIONS FROM LOCAL PENSION BOARD

- 3 The report has been considered and endorsed by the Local Pension Board at its meeting of 15 May 2025.

RECOMMENDATION

- 4 It is recommended that Members:
 - i) **approve the Local Pension Board 2024/25 Annual Report.**

BACKGROUND

- 5 This document sets out the work undertaken by the Local Pension Board of the Authority. The Authority is the Scheme Manager as defined under Section 4 of the Public Service Pensions Act 2013. The Board is established in accordance with Section 5 of that Act.
- 6 The governance requirements around pensions were introduced as a result of the Public Service Pensions Act 2013 (the Act). The Act provides for clearer governance arrangements with specific defined roles, the publication of more information on a consistent basis, and administration practices in line with those in the private sector.

- 7 The Firefighters' Pension Scheme (Amendment) (Governance) Regulations 2015 relating to the creation and ongoing operation of local pensions came into force on 1 April 2015. These regulations require the Authority to establish a Local Pension Board in respect of the Firefighter's Pension Scheme by 1 April 2015.
- 8 The role and remit of the Board is to assist the Authority in its capacity as Scheme Manager by making sure it is administering the Firefighters' Pension Scheme effectively and efficiently and is complying with relevant laws and regulations. In order to aid transparency, the Scheme Manager is required to publish the annual report of its Local Pension Board.
- 9 As set in the terms of reference for the Board, the annual report should include:
- a summary of the work of the Board and a work plan for the coming year;
 - details of areas of concern reported to or raised by the Board and recommendations made;
 - details of any conflicts of interest that have arisen in respect of individual Board members and how these have been managed;
 - any areas of risk or concern the Board wish to raise with the Scheme Manager;
 - details of training received and identified training needs; and
 - details of any expenses and costs incurred by the Board and any anticipated expenses for the forthcoming year.

INFORMATION

- 10 The Local Pension Board Annual Report 2024/25 is set out in Appendix 1.

IMPLICATIONS

Wellbeing Objectives	Considered not relevant
Budget	Cost of the Local Pension Board is funded from existing Members' Services budget
Legal	The new governance requirements around pensions were introduced as a result of the Public Service Pensions Act 2013. FPS (Amendment) Governance regulations 2015.
Staffing	Considered not relevant
Equalities/Human Rights/ Welsh Language	It is not considered that there are any issues that need addressing as the recommendations apply equally to all Members regardless of protected characteristics under the Single Equality Act.
Risks	All FRAs need to comply with the guidance provided by the Pensions Regulator around the governance arrangements for Local Pension Boards.

North Wales Fire and Rescue Service Firefighters' Pension Scheme

Local Pension Board Annual Report 2024/25

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1.0 Introduction

This is the Annual Report of the North Wales Fire and Rescue Authority Local Pension Board (the Board), covering the period from 1 April 2024 to 31 March 2025. This report includes commentary on the following:

- Details of any conflict of interest that have arisen in respect of Board members;
- Details of training received and identified training needs for Board members;
- A summary of the work undertaken by the Board during 2024/25;
- Areas of concern or risk reported to or raised by the Board; and
- The forward work programme for 2025/26.

2.0 Roles and Functions

In accordance with Section 5 and Section 30 (1) of the Public Services Pensions Act 2013 and Regulation 4A of the Firefighters' Pension Scheme (Amendment) (Governance) Regulations 2015, the Board was established in April 2015. The role and remit of the Board is to assist the Scheme Manager (North Wales Fire and Rescue Authority, "the Authority") to secure compliance with:

- The relevant laws and regulations;
- Any other legislation relating to the governance and administration of the Scheme;
- The requirements imposed by the Regulator in relation to the Scheme; and
- To ensure the effective and efficient governance and administration of the Scheme.

The Board is expected to complement and enhance the Authority's existing arrangements for managing the firefighter pension schemes. It does not replace the existing arrangements and it is not a decision-making body. Rather, it is designed to act as a critical friend to the Authority and its officers when they act in the capacity of scheme manager.

3.0 Membership and meetings of the Board

The Board membership comprised of ten members made up as follows:

- Five employer representatives comprising of three members of the Authority, the Clerk to the Authority (or nominated deputy) and Treasurer of the Authority.
- Five employee representatives – four of whom are from each representative body officially associated with the Authority and one representing the retained duty system.

A summary of the membership for 2024/25 is provided below:

Name	Role	Representing	Dates (aligned to meeting dates for part year)
Bryan Apsley	FRA Member	Employer	Full year
Dafydd Edwards (Chair)	Authority Treasurer	Employer	Full year
Gareth Owens	Monitoring Officer	Employer	Full year
John Brynmor Hughes	FRA Member	Employer	Full year
Gwynfor Owen	FRA Member	Employer	Full year
Dawn Docx	Fire Leaders' Association	Employee	18/04/2025-30/01/2025
Stuart Millington	Fire Leaders' Association	Employee	30/01/2025-present
Paul Kay	Fire Officers' Association	Employee	Full year
Geraint Evans	RDS Representative	Employee	Full year
Terry Ledden	Fire Brigades Union	Employee	Full year
Rebekah Uden	Fire Brigades Union	Employee	Full year

In addition to Local Pension Board members, the following key officers support the Board and attend Board meetings:

- Assistant Chief Fire Officer, Finance and Resources;
- Service Pensions Manager; and
- Technical Lead (joint arrangement with South Wales Fire and Rescue Service).

Chair of the Board

The Chairperson of the Board is rotated every two years between a member representing employers and those representing scheme members.

Dafydd Edwards was elected as Chair for the period 2024/25, representing the employer. The Chair is also nominated to sit on the National Firefighters' Pension Scheme Advisory Board for Wales.

The Board was scheduled to meet on four occasions during the 2024/25 financial year and meeting were held on the following dates:

- 18 April 2024
- 18 July 2024
- 01 October 2024
- 30 January 2025

4.0 Conflicts of Interest Policy

The Public Service Pensions Act 2013 (the Act) requires that a member of a pension board does not have a conflict of interest. A conflict of interest is defined as a financial or other interest which is likely to prejudice a person's exercise of functions as a member of a pension board. The Act is clear that actual membership of one of the Firefighter Pension Schemes is not in itself a conflict of interest, so would not preclude a scheme member from serving on the Board.

The Board has a policy for the management of potential conflicts in order to ensure that they do not become actual conflicts and all members of the Board are familiar with the policy. In addition, conflicts of interest is a standing item on all Board agendas and any interests noted by Members are recorded so that appropriate action can be taken to manage the conflict.

There have been no declarations made by any Member, advisor or attendee during the relevant period.

A copy of the Conflict of Interest policy can be found here:

[Conflict of Interest Policy](#)

5.0 Knowledge and Understanding

It is a statutory requirement of the Public Service Pensions Act 2013 that members of the Local Pension Board should have the capacity to become conversant with, and develop a knowledge of, detailed pension related issues to effectively carry out their duties.

Each individual appointed to the Board must have knowledge and understanding of the law relating to pensions and such other matters as may be prescribed in other legislation.

A Board member should have an understanding of what is relevant to their role in the following areas:

- The Firefighter Pension Scheme regulations;
- Other legislation relating to the governance and administration of the schemes;
- Requirements imposed by the Pensions Regulator; including
- The standards and expectations set out in any relevant code of practice issued by the Pensions Regulator.

Upon appointment, Members are required to complete the online training modules available on the Pensions Regulator's website. In addition, the Authority provides both induction training to new Board members and ongoing training sessions during Board meetings for all Members to assist them in undertaking their role.

The Scheme Manager keeps appropriate records of the learning activities provided to individual Members and the Board as a whole. Members of the Board are encouraged to identify their own training needs in order that the training provided remains relevant and appropriate. Training is provided through the pensions regulator's public sector toolkit, through external events such as those provided by the LGA and also through in-house training.

6.0 Work Programme 2024/25

The Board met on four occasions during the financial year and the scope its work was defined by the Terms of Reference. The Board considers its Terms of Reference on an annual basis and makes recommendations for any changes to be considered by the Fire and Rescue Authority. The most recent version was considered at its meeting of 30 January 2025 and proposals were made to reduce the number of members required to achieve a quorum to three (previously six). In addition, each meeting should have a minimum of one employer and one employee representative.

The Terms of Reference can be found via the following link:

[Local Pension Board - Fire and Rescue Authority - North Wales Fire And Rescue Service \(gov.wales\)](https://gov.wales/local-pension-board-fire-and-rescue-authority-north-wales-fire-and-rescue-service)

During the period 1 April 2024 to 31 March 2025 the following specific matters were considered by the Board:

- Review and approval of the Terms of Reference;
- Consideration of the national legal challenge relating to the transitional pension scheme arrangements (McCloud Judgment);
- Consideration of the legal matter relating to the pension arrangements for on call firefighters (O'Brien Judgment);
- Updates in relation to the 2020 GAD valuation including financial support from the Welsh Government;
- Review and submission of the proposal for employee contribution rate changes following the 2020 GAD valuation;
- Updates from the Scheme Advisory Board for Wales;
- Knowledge and training update;
- Updates on Pension Ombudsman cases; and
- An update on the risks associated with the scheme and revision to the risk register.
- Matters of significance escalated to the Scheme Manager include the administration of legal challenges and proposals to amend the Terms of Reference.

Each agenda also includes the following standing items:

- Declaration of Interest;
- Minutes of last meeting;
- Firefighters' Pension Schemes Update Report which focuses on membership and internal complaints and cases referred to the Pensions Ombudsman;
- Administrators Update Report (Dyfed Pension Fund) confirming compliance with Welsh Government circulars and data quality;
- An update on legal matters affecting the scheme;
- Scheme Advisory Board Update;
- Training for members of the LPB;
- Risk Register; and
- Matters for escalation to full FRA.

Since the Local Firefighter Pension Board was set up in 2015, the work of the Board has been shaped by the Board members and by officers supporting the Board. Some regular reports have been developed and these are:

- The Firefighters' Pension Schemes Update Report which provides the Board with the latest information on areas of significant pension work, and includes both local and national issues. As well as enhancing the knowledge and understanding of Board members, this regular report serves to prompt discussion at the Board about the impact of issues on pension Scheme members and about how workloads are being managed. This helps to achieve the Board's purpose of securing effective governance and administration;
- The Dyfed Pension Fund Update Report which is produced by the administrators and provides assurance that the scheme is being properly administered. As well as providing regulatory updates, the report focuses on specific workload issues, such as, the Guaranteed Minimum Pension reconciliation, data quality, appeals, breaches and activity levels on the 'My Pensions Online' tool; and
- Specific areas of the Risk Register which are reviewed regularly by the Scheme Manager and is presented to the Board at each meeting, with any amendments highlighted. This allows the Board to keep track of the key risks and the control measures designed to manage those risks.

More detail is available in the agendas and minutes of the above Board meetings which can be accessed via following link: [Local Pension Board](#)

8.0 Work Programme 2025/26

The Firefighters' Pension Scheme Board maintains a work programme which is considered at every meeting. Now that the Board has completed a number of training activities, it will begin to select topics for in-depth analysis with a view to making recommendations to the Authority as and when necessary.

The Work Programme for 2025/26 is as set out below:

Local Pension Board Forward Work Plan 2025/26

Agenda item	Meeting 1	Meeting 2	Meeting 3	Meeting 4
Administrator's update report	X	X	X	X
Annual Report	X			
Discretionary Policy update	X			
Internal Disputes Resolution Policy		X		
Items of significance to be escalated to Fire and Rescue Authority	X	X	X	X
Legal challenges and regulatory matters	X	X	X	X
Member Induction	This is ongoing as new members are appointed to the LPB			
Review of membership and confirmation of meeting dates	X			
Review of Terms of Reference				X
Risk Register	X	X	X	X
Scheme Advisory Board Wales	X	X	X	X
Service update report	X	X	X	X
The Pensions Regulator – aspects of good governance		X	X	X
Training needs analysis	X			
Training update	X	X	X	X