

AWDURDOD TÂN AC ACHUB GOGLEDD CYMRU



NORTH WALES FIRE AND RESCUE AUTHORITY

A meeting of the **EXECUTIVE PANEL** will be held **MONDAY 19 JUNE 2023** at **St Asaph Fire and Rescue Headquarters** and virtually **via Zoom** commencing at **14:00 hrs.**

Yours faithfully,
Gareth Owens
Clerk

AGENDA

- 1. Apologies**
- 2. Declaration of Interests**
- 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 Meeting held on 20 March 2023**
- 5. Matters Arising**
- 6. Performance Monitoring Report 2022/23**
- 7. Emergency Cover Review**
- 8. Review into Automatic Fire Alarms**
- 9. Risk Register**
- 10. Environmental Strategy**
- 11. Consultation Response on Age Discrimination Regulations (Firefighter Pension Scheme)**
- 12. 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 3 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.

None.

NORTH WALES FIRE AND RESCUE AUTHORITY
EXECUTIVE PANEL

Minutes of the **Executive Panel** of the North Wales Fire and Rescue Authority held on Monday 20 March 2023 virtually via Zoom. Meeting commenced at 14.00hrs.

Councillor

Cllr Dylan Rees (Chair)
Cllr Alan Hughes
Cllr Chris Hughes
Cllr Gareth Sandilands
Cllr Rob Triggs
Cllr Dyfed Wyn Jones

Representing

Ynys Môn County Council
Denbighshire County Council
Conwy County Borough Council
Denbighshire County Council
Gwynedd Council
Ynys Môn County Council

Also present:

Dawn Docx
Stewart Forshaw
Richard Fairhead
Stuart Millington
Helen MacArthur
Dafydd Edwards
Tracey Williams
Gareth Owens
Heledd Davies
Lisa Allington

Chief Fire Officer
Deputy Chief Fire Officer
Assistant Chief Fire Officer
Assistant Chief Fire Officer
Assistant Chief Fire Officer
Treasurer
Head of Corporate Communications
Clerk and Monitoring Officer
Atebol - Translator
Executive Assistant

1 APOLOGIES

Councillor

Cllr Carol Beard
Cllr Gareth A Roberts
Cllr Paul Cunningham (Deputy Chair)

Representing

Conwy County Borough Council
Gwynedd County Council
Flintshire County Council

ABSENT

Councillor

Cllr Chrissy Gee
Cllr Rondo Roberts
Cllr Dale Selvester

Representing

Flintshire County Borough Council
Wrexham County Council
Flintshire County Council

The Chair welcomed new Member, Cllr Dyfed Wyn Jones representing Anglesey County Council, to this, his first Authority meeting.

2 DECLARATIONS OF INTEREST

2.1 There were no declarations of interest to record.

3 NOTICE OF URGENT MATTERS

3.1 There was no notice of urgent matters.

4 MINUTES OF THE MEETING HELD ON 12 DECEMBER 2022

4.1 It was noted that some of the constituent councils had been allocated incorrectly against Councillor names in the attendance section of the minutes of the meeting held on 12 December 2022.

4.2 **RESOLVED to:**

i) approve the minutes as a true and correct record of the meetings held, noting the stated amendment.

5 MATTERS ARISING

5.1 CFO Docx gave a brief update on the Pay Award and the associated risk for potential industrial action. It was noted that Members had been regularly briefed over the last six-months on this item.

5.2 A pay offer had been made by the National Joint Council on 07 February 2023 of 7% backdated to July last year, and a 5% offer effective July this year. The Fire Brigades Union balloted their members with a recommendation to accept this offer, and 96% voted to accept with a turnout of 84%.

5.3 The Service welcomes any settlement which avoids industrial action and supports its staff, and all preparations for business continuity arising from the potential of industrial action have now been stood down.

5.4 Members were asked to note that there was no additional funding linked to this pay offer and so the additional cost would have to be found from the Service's budget. This will require changes in emergency cover to find an appropriate balance between the challenges we face in protecting the people of North Wales and ensuring that we have a sustainable budget going forward.

6. BUDGET UPDATE

6.1 ACFO MacArthur presented the Budget Update paper which aimed to provide members with a financial update following the approval of the 2023/24 revenue budget at the North Wales Fire and Rescue Authority meeting of the 16 January 2023.

6.2 Since writing this paper, a pay offer of a set amount for green book staff had been made which exceeds the planning assumptions made within the budget for 2023/24. It is anticipated that this increased cost would amount to £130,000, should it be accepted.

- 6.3 Members were advised that the recent pay award had now resulted in an additional budget pressure of £1m, in addition to the existing pressure of £1.4m.
- 6.4 Reserves would be used to bridge the gap for financial year 2022/23 but this would leave them severely depleted. The only options available to the Service moving forward, therefore, was to look at both increasing income via the levy to the Local Authorities and to make cost efficiencies through the Emergency Cover Review currently being undertaken.
- 6.5 Those present were advised that Members of the Audit Committee had resolved to contact their local MP's in order to lobby them with regards to the provision of additional funding to cover the pressure created by the pay award.
- 6.6 **RESOLVED to:**
- i) **note the conclusion of the pay negotiations for firefighters and the associated further cost pressures;**
 - ii) **consider the short-term use of reserves to address the cost pressures arising from the firefighters' pay settlement;**
 - iii) **note that the pay negotiations for all other staff remain outstanding at this time; and**
 - iv) **note that the £2.4m underlying deficit will have unavoidable implications for future service delivery and increased levy for 2024/25.**

7. PSB WELLBEING PLANS

7.1 ACFO MacArthur presented the PSB Wellbeing Plans paper which presented to Members the draft Wellbeing Plans of the three Public Service Boards (PSB) in North Wales.

7.2 RESOLVED to:

- i) **note the requirements of the Well-being of Future Generations (Wales) Act 2015; and**
- ii) **approve the three well-being plans in their capacity as the Fire and Rescue Authority.**

8. DRAFT IMPROVEMENT AND WELLBEING PLAN, INCORPORATING ANNUAL ACTION PLAN

8.1 DCFO Forshaw presented the paper on the Draft Improvement and Wellbeing Plan, incorporating the Annual Action Plan, which informed Members of the progress being made towards compiling the draft 2023-24 revision of the North Wales Fire and Rescue Authority's (the Authority's) Corporate Plan 2021-24, for approval at the Authority's next meeting in April 2023.

8.2 It was noted that the recommendations made by Dan Stephens, Chief Fire and Rescue Advisor, would be picked up in the maintenance and development of firefighter key skills area, one of the three key challenges.

8.2 **RESOLVED to:**

- i) **note the progress being made towards compiling the 2023-24 revision of the Corporate Plan 2021-24 that will be presented for approval to the full Authority in April 2023; and**
- ii) **note the refreshed appearance of the 2023-24 Corporate Plan annual review in comparison to previous years.**

9. PAY POLICY STATEMENT

9.1 ACFO MacArthur presented the Pay Policy Statement which informed Members of the Fire and Rescue Authority's responsibilities arising from the Localism Act 2011 (the Act).

9.2 It was noted that this document did not propose any changes, but that it required approval on an annual basis.

9.3 **RESOLVED to:**

- i) **note the requirements of the Localism Act 2011; and**
- ii) **approve the Pay Policy Statement for the 2023/24 financial year.**

10 PERFORMANCE MONITORING

10.1 DCFO Forshaw presented the Performance Monitoring paper which provides information about incident activity during the first nine months of the 2022/23 financial year; performance in relation to the Authority's improvement and well-being objectives; and other notable incident activity.

10.2 Thanks were given to the staff for their continued excellent work and Members highlighted the pleasing increase in availability, following the Service restructure which took place last year.

10.3 **RESOLVED to:**

- i) **note the content of the performance monitoring report**

11 OVERVIEW OF EMERGENCY COVER REVIEW

11.1 ACFO Fairhead presented the Overview of Emergency Cover Review paper which outlined the information presented to the Members' Working Group on 14 March 2023. During this meeting, Members were given a presentation by Assistant Chief Fire Officer Richard Fairhead and ORH to introduce the purpose of undertaking an Emergency Cover Review and the methodology to be used.

11.2 It was noted that this review had originally been implemented to look at how the Service could improve fire cover across North Wales; however, it would now be necessary to also identify where any efficiencies could be made in order to alleviate the pressure on the budget.

11.3 RESOLVED to:

i) note the contents of this report.

12 OVERVIEW OF SUSTAINABILITY PLAN

12.1 ACFO Millington presented the paper on the Overview of the Sustainability Plan which outlined the information presented to the Members' Working Group on 14 March 2023. During this meeting, Members were given a presentation by the Environment and Climate Change Manager which introduced the concept of an Environmental Strategy, and discussed some of the decisions which will need to be made in order to develop one.

12.2 Members were advised that the Service worked collaboratively with the other Fire and Rescue Services across Wales where possible, and an all-Wales approach was adopted for procurement of high-value contracts.

12.3 RESOLVED to:

i) note the contents of this report.

13 URGENT MATTERS

13.1 There were no urgent matters to raise.

Meeting closed: 15:00 hrs

Report to	Executive Panel	
Date	19 June 2023	
Lead Officer	Stewart Forshaw, Deputy Chief Fire Officer, (Corporate Policy and Planning)	
Subject	Performance Monitoring: Apr 2022 – Mar 2023	

Purpose of Report

- 1 To provide information about incident activity during the 2022/23 financial year; performance in relation to North Wales Fire and Rescue Authority's (the Authority) improvement and well-being objectives; and other notable incident activity.

Executive Summary

- 2 During the 2022/23 financial year, North Wales Fire and Rescue Service (the Service) attended 5,894 emergency incidents. This is an increase of 10.1% compared with the 2021/22 financial year (5,354).
- 3 Attendances at non-fire emergencies, which are classified as Special Service Calls (SSCs), increased 26.3% to 1,210. This follows a change in policy during 2021/22 regarding attendance at SSCs, to provide more assistance to the public and partner agencies, whilst at the same time increasing the visibility of the Service in the community.
- 4 The number of accidental fires in the home (ADFs) attended during the financial year declined to 344, compared to 399 during 2021/22. I am pleased to report that no accidental deaths in dwelling fires occurred during the financial year, and that there was also a reduction in the number of serious injuries, from 5 to 3, compared to 2021/22. The Service continued to deliver fire prevention interventions and initiatives to support fire safety in the homes and communities of North Wales.
- 5 Wildfires continued to be an area of focus for the Service, which can be a result of extreme weather events linked to climate change, and is an area of growth in the UK in comparison to the reduction of house fires during the past decade. Wildfires can be particularly challenging incidents for the Service to deal with because of their erratic nature, potential size, scale, and intensity, and because of the rural and rural-urban interface environments in which they tend to occur.

- 6 As defined by the National Fire Chiefs Council (NFCC), a wildfire is a grassland, woodland or crop fire that:
1. involves a geographical area of at least one hectare (10,000 square metres or 100m x 100m);
 2. has a sustained flame length of more than 1.5 metres;
 3. requires a committed resource of at least 4 fire and rescue appliances/resources;
 4. requires resources to be committed for at least 6 hours; and/or
 5. presents a serious threat to life, environment, property, and infrastructure.
- 7 During the 2022/23 financial year, there was a slight increase to 55 in the number of wildfires that were attended by a combined total of 359 vehicles for over 1,108 hours.
- 8 There were 2,673 False Alarms attended during the financial year, an increase of 6.2% on the previous financial year. This was due to an 9.7% increase in attendances at fire alarms due to apparatus (AFAs) from 1,398 to 1,534, and to malicious false alarms from 43 to 52 (20.9%). The Service received 1,485 Commercial AFA calls, of which 17 (1.1%) were attended and 1,468 (98.9%) were not attended. In addition, 446 hospital AFA calls were received, of which 203 (45.5%) were attended and 243 (54.5%) were not attended.
- 9 The changes to our attendance policy to incidents at HMP Berwyn implemented during the pandemic, and the fire safety advice delivered during 2022/23, resulted in a reduction of fires attended at the prison to 19 from 22 during 2021/22.
- 10 Fire crews' availability performance in accordance with the 20 stations availability target increased 3.5% to 324 days (88.8%) compared with 313 days (85.8%) in the previous financial year.

Recommendation

- 11 That Members:
- i) note the content of the Performance Monitoring Report.

Information

- 12 **All Incidents**
- The upward trend in the number of incidents attended continued, with 10.1% more incidents attended during the financial year, 5,894 compared with 5,354 in the previous financial year. The main contributor to the increase was Special Service Calls which increased by 26.3%.

- 13 **Fires**
Fires attended during the financial year increased 7.0% to 2,011 compared with 1,879 during 2021/22.
- 14 **Grassland, Woodland and Crop Fires**
Grassland, Woodland and Crop fires increased 26.5% to 472 from 373 during 2021/22. Secondary accidental grassland, woodland and crop fires increased to 306 from 234, with 'Grassland, Pasture, Grazing etc.' and 'Heathland or Moorland' fires being the main contributors, increasing from 68 to 94 and 81 to 107 respectively. Increases were also recorded in 'Tree Scrub - includes single trees not in garden' (20 to 31); 'Hedge' (17 to 29) and 'Straw/stubble burning' (1 to 9).
- 15 Secondary Deliberate Grassland, woodland and crop fires increased 15.2% from 125 to 144. Whilst the main contributors to the increase were 'Grassland, Pasture, Grazing etc.' (47 to 64) and 'Tree Scrub - includes single trees not in garden' (15 to 24), "Heathland or moorland" fires reduced from 40 to 27.
- 16 **Wildfires**
During the 2022/23 financial year, although there was an increase in attendance at wildfires to 55 from 52 in the previous financial year, 359 vehicles attended compared to 410. The time spent at scene declined to 1,108 hours, compared to 1,560 hours during the previous financial year.
- 17 **Primary Fires**
Primary fires declined 3.0% from 880 to 854 compared with the same period of 2021/22 and were 3.4% below the 3-year average of 884. Although accidental primary fires decreased 3.5% from 737 to 711 on the back of a reduction in accidental primary dwelling fires, accidental primary fires were 2.0% above the 3-year average of 697. The number of deliberate primary fires were unchanged at 143 compared to the previous financial year and were 23.5% below the 3-year average of 187.
- 18 **Secondary Fires**
Secondary fires, which were 23.2% above the 3-year average of 842, increased 18.0% from 879 to 1,037, due to a 20.2% increase in accidental secondary fires (550 to 661). Whilst increases were recorded in 'Grassland, woodland and crops' (234 to 306) and 'Other outdoors (including land)' (149 to 205), there was a reduction in 'Outdoor structures' (140 to 115). Deliberate secondary fires increased 14.3% (329 to 376), wherein 'Grassland, woodland and crops' and 'Other outdoors (including land)' increased 15.2% (125 to 144) and 23.0% (126 to 155) respectively.

- 19 **Chimney Fires**
Chimney fires, which were unchanged at 120 compared with the previous financial year, have decreased 17.2% compared with the same period in 2018/19 (145) and were 14.9% below the 3-year average of 141.
- 20 **Accidental Dwelling Fires (ADFs)**
The Service attended 13.8% fewer ADFs - 344 compared with 399 during the 2021/22 financial year. ADF's in 'House - Single Occupancy' and 'Bungalow - Single Occupancy' led the decrease from 234 to 198 and from 62 to 40 respectively. The main causes of fire at the ADFs were 'Cooking – other cooking', 'Combustible Articles too Close to Heat Source (or fire)'; 'Faulty fuel supply – electricity' and 'Cooking – Chip Pan/Deep Pan Fryer' which decreased from 80 to 78, 89 to 63; 41 to 34 and 26 to 10 respectively. There was however an increase in 'Overheating, Unknown Cause' from 12 to 20.
- 21 **Fatalities/Casualties in ADFs**
There were no fatalities in ADFs during the financial year compared with 5 during 2021/22. The number of casualties in ADFs decreased from 113 to 71, with 3 people sustaining serious injuries compared to 5 during 2021/22.
- 22 **Smoke Detectors – ADF's**
Smoke/heat detectors were present at the majority of accidental fires in dwellings during the financial year (87.2%). ADF's where a smoke/heat detector was fitted, operated and raised the alarm, reduced from 190 to 176.
- 23 Where a smoke/heat detector was fitted - operated but did not raise the alarm, incidents reduced from 78 to 43.
- 24 ADF's where no detector was fitted decreased from 50 to 44, and where a detector was fitted and did not operate, the number of incidents remained unchanged at 81.
- 25 **Deliberate Primary Fires in Non-Residential Buildings**
Deliberate primary fires in non-residential buildings declined from 54 to 48, with 19 occurring at HMP Berwyn.
- 26 **False Alarms**
The upward trend in false alarms continued with the Service attending 2,673 false alarms – 6.2% more than in the same period of 2021/22 (2,517), and 12.8% more than the 3-year average of 2,369. Those originating from AFA systems increased 9.7% from 1,398 to 1,534 and represented 57.4% of false alarm attendances.

- 27 **Non-Residential Automatic Fire Alarms (AFA)**
 Non-Residential AFAs increased 27.0%, from 200 to 254 mainly due to 'Hospitals and Medical Care' which increased from 134 to 186. The main causes of activation in Non-Residential AFAs were 'Faulty' (85 to 95); 'Accidentally/carelessly set off' (35 to 40); 'Other' (10 to 18) and 'Chemicals/aerosols' (10 to 19).
- 28 **Other-Residential AFAs**
 There was a 16.5% increase in 'Other-Residential' AFAs from 97 to 113, with 'Nurses'/Doctors' Accommodation' and 'Hotel/motel' increasing from 9 to 25 and 15 to 23 respectively. 'Student Hall of Residence' and 'Residential Home' however, decreased from 32 to 20 and 23 to 15 respectively. Although the main causes of activation in 'Other-Residential' was 'Cooking/burnt toast', with a slight increase from 27 to 30, 'Steam' and 'Other' increased from 4 to 9 and from 3 to 7 respectively. There was however a decrease in 'Faulty' from 31 to 26.
- 29 **Dwelling AFAs**
 AFAs in Dwellings continued on an upward trend, increasing by 5.8% from 1,100 to 1,165, with 'House – Single Occupancy' being the lead contributor to the increase, rising from 278 to 338, followed by 'Bungalow – single occupancy' increasing from 300 to 340. Decreases were recorded in 'Purpose Built Flat/Maisonette – multiple occupancy' and 'Self-contained Sheltered Housing' from 393 to 361 and from 87 to 74 respectively.
- 30 Of the 1,165 Dwelling AFAs, 'Cooking/Burnt Toast' was the main cause of activation, increasing from 574 to 600. Slight increases were also recorded in 'Other' (58 to 69); 'Accidentally/Carelessly Set Off' (51 to 60); 'Water Intrusion' (2 to 14), and where no cause was determined (5 to 13).
- 31 **Good Intent False Alarms**
 Good intent false alarms increased marginally by 1.0% from 1,076 to 1,087, due to increases in 'False Alarm – Property not found' (52 to 85).
- 32 'Other Outdoors (including land)' false alarms made with good intent decreased from 295 to 239 on the back of decreased 'Controlled burning' (262 to 215).
- 33 'Dwelling' good intent false alarms increased 8.0% from 399 to 431 due to increases in 'Other' and 'Other cooking', 199 to 210 and 52 to 86 respectively.
- 34 'Non-Residential' false alarms made with good intent increased from 74 to 83 due to increases in 'Other' (24 to 31), and 'Overheating Appliance' (1 to 9).

- 35 Good intent false alarms in 'Grassland, Woodland and Crops' decreased from 127 to 116, with 'Controlled burning' and 'Reported incident/Location not found' reducing from 95 to 88 and 22 to 16 respectively.
- 36 **Malicious False Alarms**
Malicious False Alarms saw an increase from 43 to 52 on the back of increased 'Dwelling' which increased from 21 to 36.
- 37 **Special Service Calls**
Special Service Calls increased 26.3% to 1,210 from 958 during the previous financial year and were 63.5% above the 3-year average of 740. This can be attributed to the change in policy aimed at increasing the presence of the fire service in the community when needed.
- 38 'Other than RTC' increased 30.1% (751 to 977). The main contributor to the increase was 'Assist Other Agencies' which increased 36.3% (226 to 355). Increases were also recorded in 'Effecting entry/exit' (77 to 98); 'Lift Release' (75 to 87); 'Other Rescue/Release of Persons' (60 to 92); separating people from objects (70 to 80), 'Animal assistance incidents' (6 to 46), and 'No Action (not false alarm)' (52 to 80). There were decreases however, in 'Flooding' and 'Make Safe (not RTC)' from 66 to 53 and 49 to 17 respectively.
- 39 **Road Traffic Collisions (RTC) Incidents**
The Service attended 12.6% more RTCs (207 to 233), where 69 (29.6%) involved the extrication or release of persons. Where the Service was called upon to make a vehicle or scene safe, attendance increased 24.1% (83 to 103). Although the Service attended more RTCs, the percentage of RTCs which involved the release or extrication of persons was at its lowest level since 2018/19 (39.4%) and was also lower than the 3-year average of 36.2%.
- 40 **Safe and Well Checks (SAWCs)**
The Service completed 18,052 SAWCs of which 6,162 (34.1%) were High Priority SAWCs. Of the High Priority SAWCs, 3,487 (56.6%) were referrals from a partner agency.
- 41 **Station Performance**
Planned 20 station availability was achieved on 324 days (88.8%) compared with 313 (85.8%) in the previous financial year. This however is still lower than the 363 days (99.5%) achieved in 2018/19.

IMPLICATIONS

Well-being Objectives	Helps the Authority to monitor its performance against the improvement and well-being objectives in the Corporate Plan 2021-24.
Budget	Helps to highlight any potential impacts on budget due to unanticipated incident activity.
Legal	Assists the Authority with ensuring that there are sufficient resources to meet demand.
Staffing	No implication identified.
Equalities/Human Rights/ Welsh Language	No implication identified.
Risks	Not satisfying legal requirements to report on and monitor performance that may impact on the ability to ensure that there are sufficient resources to meet demand.

NORTH WALES FIRE AND RESCUE SERVICE



**Gwasanaeth Tân ac Achub
Fire and Rescue Service**

PERFORMANCE MONITORING REPORT

For the twelve months

April 2022 – March 2023

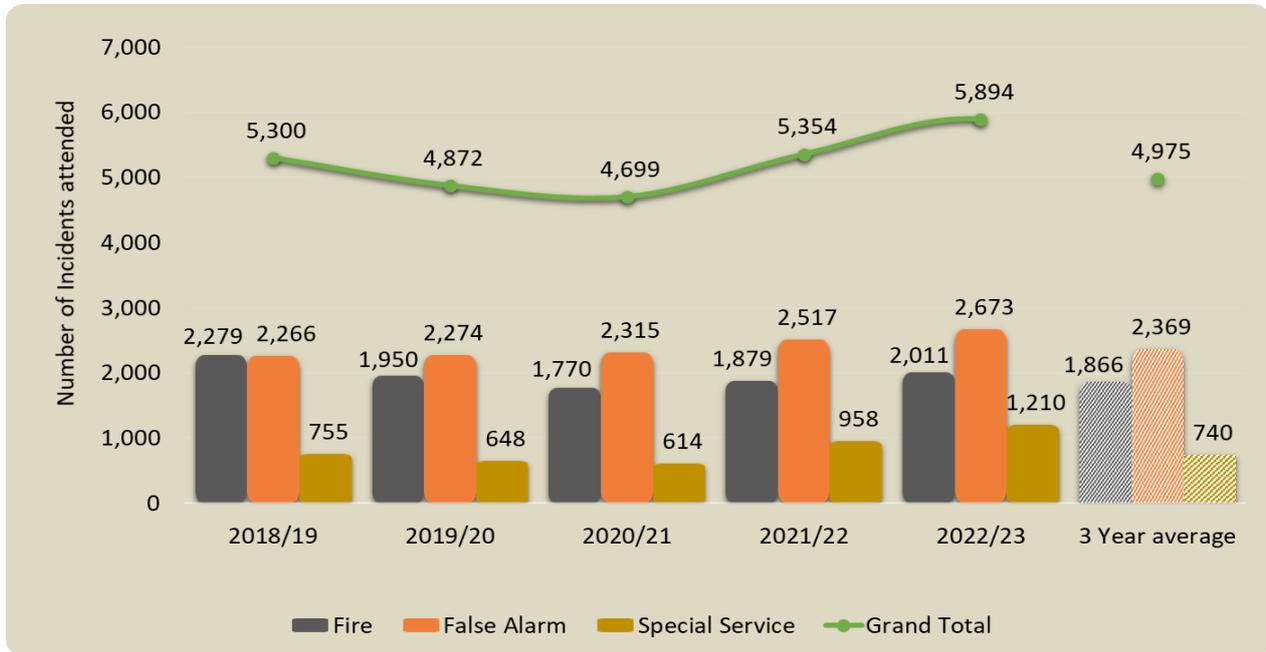
Figures are provisional and may be subject to minor amendment.

CONTENTS

INCIDENT ACTIVITY REPORTING	
ALL INCIDENTS	
All Incidents	1-2
FIRES BY CATEGORY	
Fires by category and motive	3-4
Primary Fires, by property type and motive	5
Accidental fires in dwellings	6-7
Fatalities and casualties from accidental fires in dwellings	8
Smoke Detectors - Accidental Dwelling Fires (ADFs)	9-10
FALSE ALARMS	
False alarms by category	11-12
SPECIAL SERVICE INCIDENTS	
Special service incidents by category	13-14
Road Traffic Collisions and Extrications/Release	15-16
MONITORING AGAINST OBJECTIVE 1- TO WORK TOWARDS MAKING IMPROVEMENTS TO THE HEALTH, SAFETY AND WELL-BEING OF PEOPLE IN WALES	
Safe and Well Checks	17-18
Planned 20 Station Availability	19
GLOSSARY	
Glossary	20-21

1. All Incidents

1.1 During the 2022/23 financial year, the Service attended 5,894 emergency incidents and false alarms, a 10.1% increase on the previous financial year (5,354).



Category	Year	Q1	Q2	Q3	Q4	Year-to-Date (YTD)	% change YTD	Average of 3 previous years	% change YTD / Average of 3 previous years
Total incidents attended	2022-23	1,575	1,877	1,210	1,232	5,894	↑ 10.1%	4,975	↑ 18.5%
	2021-22	1,322	1,415	1,254	1,363	5,354			
Total fires	2022-23	577	719	337	378	2,011	↑ 7.0%	1,866	↑ 7.8%
	2021-22	575	480	347	477	1,879			
Total special service incidents	2022-23	327	371	267	245	1,210	↑ 26.3%	740	↑ 63.5%
	2021-22	152	233	315	258	958			
Total false alarms	2022-23	671	787	606	609	2,673	↑ 6.2%	2,369	↑ 12.8%
	2021-22	595	702	592	628	2,517			

*The final two columns show: the average of the 3-previous financial years (based on the equivalent reporting period); the percentage change based on the difference between the current financial year and the 3-year average.

Narrative

Fires increase – The 7.0% increase in fires (from 1,879 to 2,011) can be attributed to the hot summer the UK and Wales was subject to, thus showing an increase of 145 incidents, a 7.8% increase over the 3-year average of 1,866.

AFA's (non-domestic) increase – We are aware of the increase in AFA's in non-domestic settings. These calls are predominately from BCUHB (numerous activation reasons). We continue to work with BCUHB in reducing these AFA activations. There is also an increase in domestic (dwelling) attendance to AFA's and this is referred to later in this report.

SSCs increase – The overall increase is due to a change in organisational policy in relation to attending SSCs; making crew more visible in the community.



2 Fires, by Category and Motive

- 2.1 A total of 2,011 fires were attended; a 7.0% increase from 1,879 in 2021/22.
- 2.2 **Primary fires** – There was a 3.0% decrease in primary fires, from 880 to 854 compared with the previous financial year and were 3.4% below the 3year average of 884.
- 2.3 **Secondary fires** – There was an 18.0% increase in secondary fires, from 879 to 1,037, and were 23.2% above the 3-year average of 842.
- 2.4 **Chimney fires** – The number of chimney fires remained unchanged at 120, the same as during the previous financial year, and were 14.9% below the 3-year average of 141.



Category	Year	Q1	Q2	Q3	Q4	Year-to-Date (YTD)	% change YTD	Average of 3 previous years	% change YTD / Average of 3 previous years
Primary fires	2022-23	226	236	193	199	854	↓ 3.0%	884	↓ 3.4%
	2021-22	251	229	200	200	880			
Secondary fires	2022-23	332	476	100	129	1,037	↑ 18.0%	842	↑ 23.2%
	2021-22	293	244	110	232	879			
Chimney fires	2022-23	19	7	44	50	120	→ 0.0%	141	↓ 14.9%
	2021-22	31	7	37	45	120			

*The final two columns show: the average of the 3 previous financial years (based on the equivalent reporting period); the percentage change based on the difference between the current financial year and the 3-year average.

Narrative

There was a year-on-year reduction in accidental primary fires. The reduction has been attributed to our ongoing prevention activities which are delivered during SAWCs and other engagements with the public.

The increase in both secondary accidental (from 550 to 661) and secondary deliberate (from 329 to 376) fires is attributed to the hot summer in the UK. In comparison, 2018/19 was also a very hot and dry summer in North Wales. Chimney Fires increased by 6 between Q3 and Q4 of the financial year. This is not unexpected following increases in utility fuel prices and the increased use of open and wood burning fires. NWFRS has been working with Scottish Power (SP) and other agencies regarding the provision of 'winter packs' to residents.

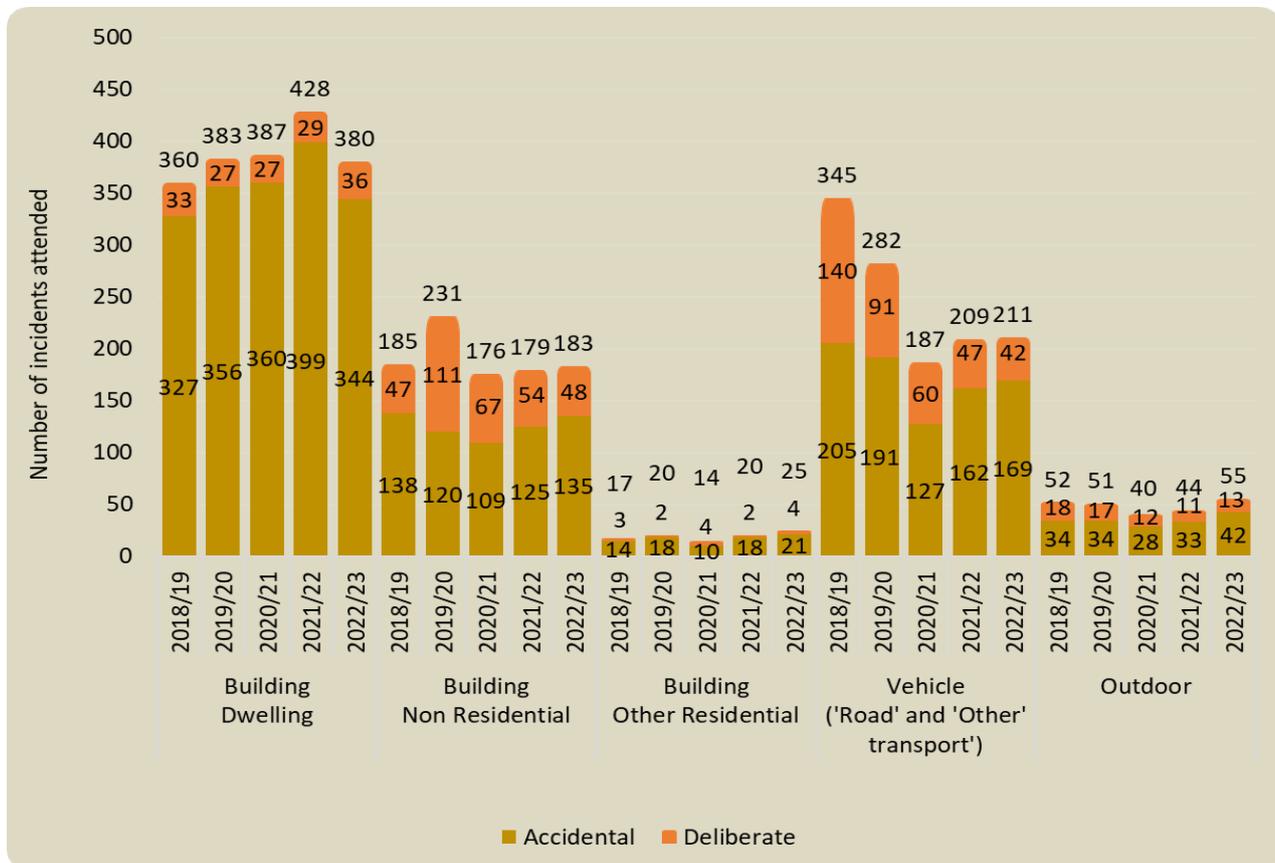
Actions taken to support communities and reduce fire events:

- 18,052 SAWCs have been delivered across North Wales in line with our current strategy;
- Work with strategic partners has continued, identifying potential risks to reduce deliberate fire incidents;
- Deliberate fire setting intervention schemes have been facilitated in-house and by DangerPoint;
- New Wales Wildfire Board has been established and the All Wales Wildfire Charter drafted to support the reduction in accidental and deliberate secondary fires;
- Prevention teams proactively attended farmers markets and agricultural shows including RWAS in July 2022 to raise the profile of impacts of Wildfires in North Wales;
- Campaign Steering Group (CSG) continued to work with Corporate Communications to proactively promote safety and Wildfire messaging across all media platforms;
- There was significant involvement with community Bonfire and Fireworks events across the service area.

3 Primary Fires, by Property Type and Motive



- 3.1 During the financial year, 48 primary fires were started deliberately at non-residential buildings, compared with 54 during 2021/22.
- 3.2 There were 19 deliberate fires at HMP Berwyn, compared with 22 in the previous financial year.



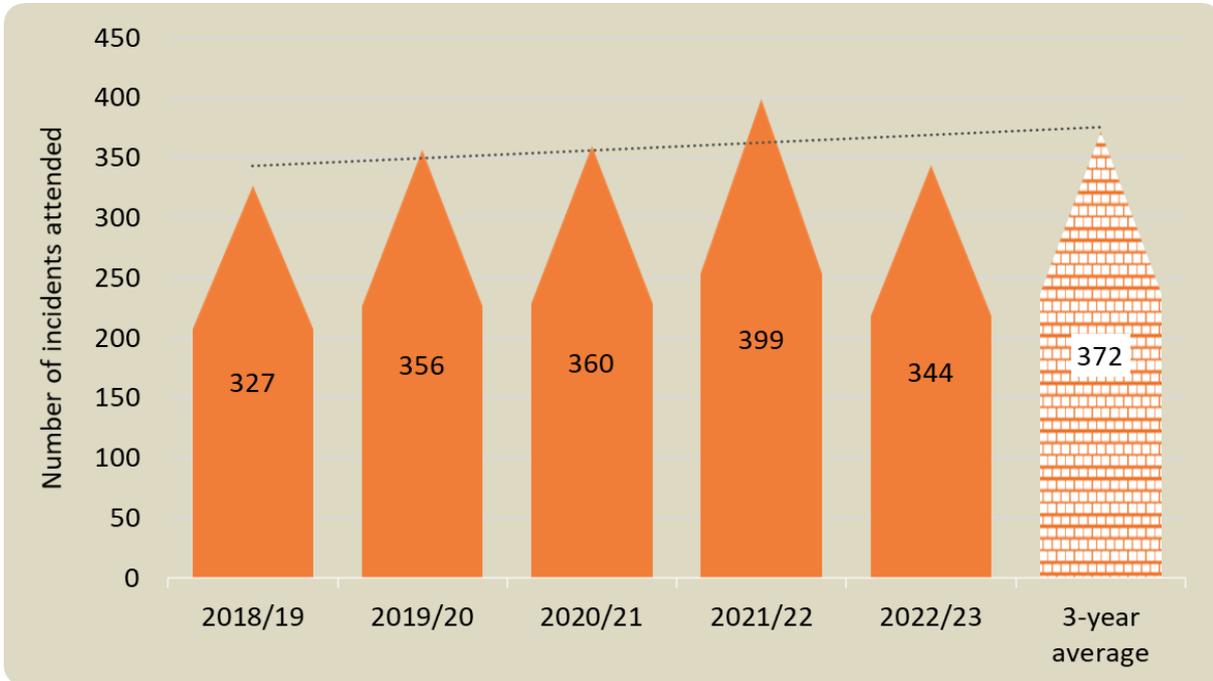
Category	Year	Q1	Q2	Q3	Q4	Year-to-Date (YTD)	% change YTD	Average of 3 previous years	% change YTD / Average of 3 previous years
All deliberate primary fires	2022-23	41	49	24	29	143	→ 0.0%	187	↓ 23.5%
	2021-22	40	42	31	30	143			
All accidental primary fires	2022-23	185	187	169	170	711	↓ 3.5%	697	↑ 2.0%
	2021-22	211	187	169	170	737			

*The final two columns show: the average of the 3 previous financial years (based on the equivalent reporting period); the percentage change based on the difference between the current financial year and the 3-year average.



4 Accidental fires in dwellings

4.1 The Service attended 344 accidental dwelling fires during the reporting period, 55 (13.8%) less than during the previous financial year (399), and 7.5% below the 3-year average of 372.



Category	Year	Q1	Q2	Q3	Q4	Year-to-Date (YTD)	% change YTD	Average of 3 previous years	% change YTD / Average of 3 previous years
Accidental fires in dwellings	2022-23	81	81	97	85	344	↓ 13.8%	372	↓ 7.5%
	2021-22	113	95	106	85	399			

*The final two columns show: the average of the 3 previous financial years (based on the equivalent reporting period); the percentage change based on the difference between the current financial year and the 3-year average.

Narrative

- There was a 13.8% reduction in the number of ADFs (344 from 399) and were 7.5% lower than the 3-year average of 372.

Actions taken to support communities and reduce ADFs:

- Ongoing work with regional hoarding groups to identify people at risk;
- Referrals continue to be received from partner agencies, totalling 31.8% (5,733) of all SAWCs delivered;
- Partnership Managers have explored new relationships with external partners to identify those persons most vulnerable to fire;
- A joint venture between NWFRS, Bangor University, and Catrefi Conwy was undertaken where StoveGuards were fitted in student accommodation to reduce cooker fires;
- Station Open days were reinvigorated which generated SAWCs and gave extra opportunity to provide safety advice;
- Local and national (Wales & NFCC) campaigns have been supported in line with our own Campaign Steering Group (CSG) calendar;
- Locally run and targeted outreach days have continued to be supported by external agencies. Areas are leafleted by Prevention teams who then return to provide SAWCs (Crews and HSSWs);
- Cost of Living 'drop in' campaign took place in Rhyl providing Prevention teams with the opportunity to give further safety advice;
- Proactive hot spotting campaigns following significant incidents produced SAWC referrals and community reassurance following incidents;
- Partnership between NWFRS and Cartrefi Conwy and Care & Repair continued to identify high priority referrals – we engage with vulnerable people who are discharged from hospital/care settings to provide interventions where required;
- Christmas safety activity included supporting local foodbanks and delivering safety talks to Ukrainian refugees.

5 Fatalities and casualties from accidental fires in dwellings

5.1 There were no ADF fatalities during the 2022/23 financial year, compared with 5 during the previous financial year. There were 3 serious, and 23 slight injuries, compared with 5 and 34 respectively. The number of precautionary checks decreased from 31 to 20, whilst the number of people requiring first aid at the scene also decreased from 43 to 25.

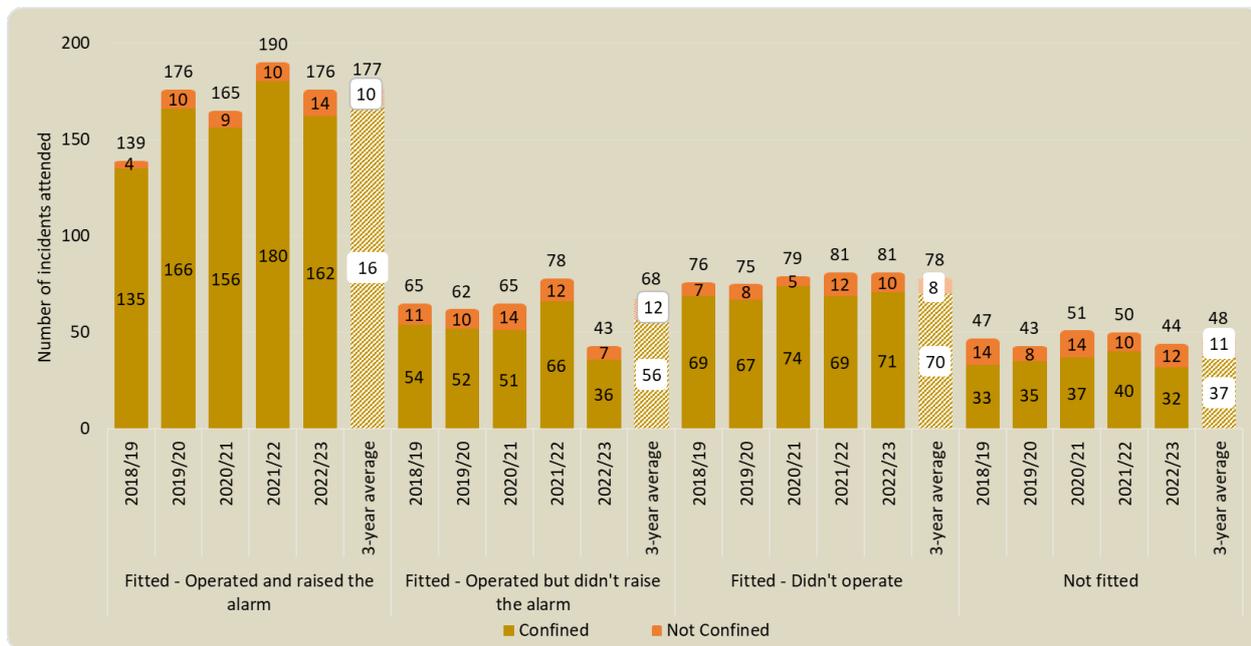
Severity of injury	2018/19	2019/20	2020/21	2021/22	2022/23
Precautionary Check	13	19	33	31	20
First Aid	27	41	26	43	25
Injuries - Slight	11	26	29	34	23
Injuries - Serious	6	4	3	5	3
Fatality	5	3	5	5	0
Total	62	93	96	118	71

Category	Year	Q1	Q2	Q3	Q4	Year-to-Date (YTD)	% change YTD	Average of 3 previous years	Change YTD / Average of 3 previous years
Injuries from accidental fires in dwellings	2022-23	10	37	14	10	71	↓ 37.2%	98	↓ 27.6%
	2021-22	43	23	30	17	113			
Deaths from accidental fires in dwellings	2022-23	0	0	0	0	0	↓ 100%		
	2021-22	3	0	0	2	5			



6 Smoke Detectors – Accidental Dwelling Fires (ADFs)

- 6.1 Smoke/heat detectors were present at the majority of ADFs, although not all went on to operate. At 44 of the ADFs, no detector was fitted.
- 6.2 Of the 344 ADFs, 301 were confined to the room of origin, the item first ignited, or there was heat/smoke damage only.



Category	Year	Q1	Q2	Q3	Q4	Year-to-Date (YTD)	% change YTD	Average of 3 previous years	% change YTD / Average of 3 previous years
Smoke detector fitted which operated and raised alarm	2022-23	36	45	49	46	176	↓ 7.4%	177	↓ 0.6%
	2021-22	54	46	55	35	190			
Smoke detector fitted which operated but didn't raise the alarm	2022-23	17	4	10	12	43	↓ 44.9%	69	↓ 37.7%
	2021-22	20	20	16	22	78			
Smoke detector didn't operate	2022-23	22	19	25	15	81	→ 0.0%	78	↑ 3.8%
	2021-22	26	16	21	18	81			
Smoke detector not fitted	2022-23	6	13	13	12	44	↓ 12.0%	48	↓ 8.3%
	2021-22	13	13	14	10	50			

*The final two columns show: the average of the 3 previous financial years (based on the equivalent reporting period); the percentage change based on the difference between the current financial year and the 3-year average.

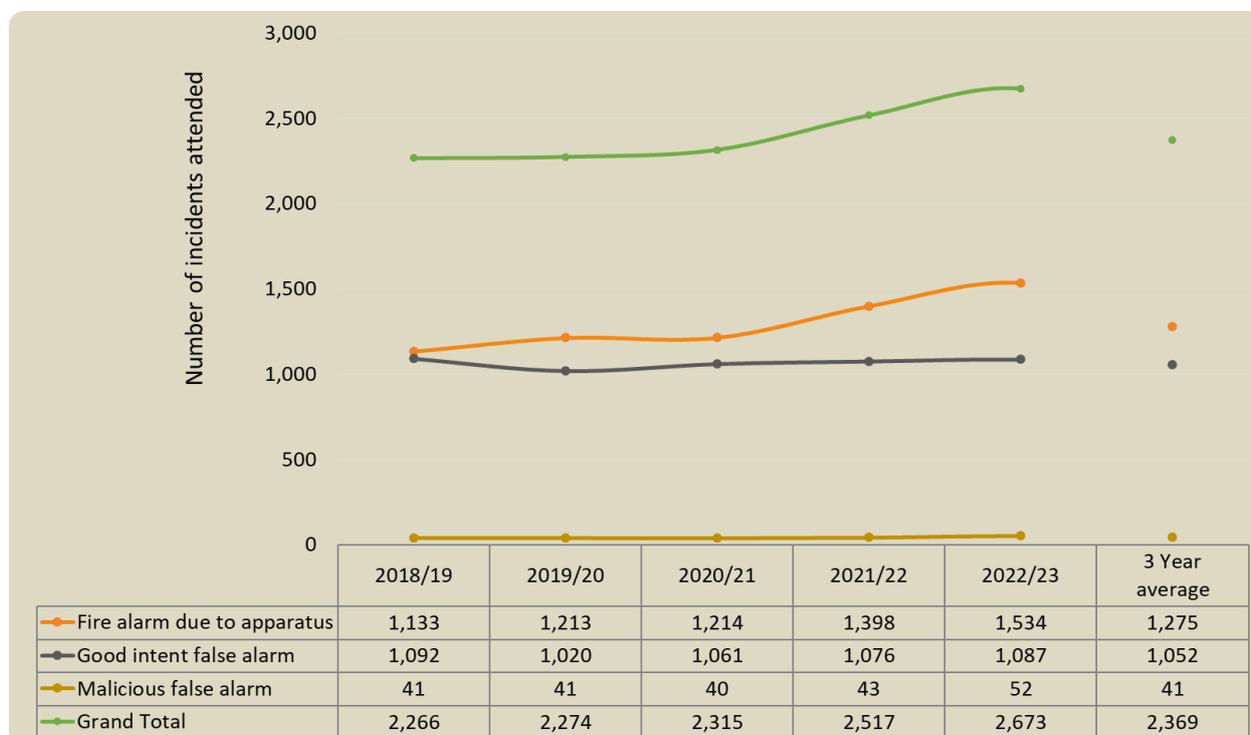
Actions taken to support communities by increasing smoke alarm ownership and safety education:

- The Service aimed to deliver 20,000 SAWCs during the financial year; 18,052 were achieved. The target for 23/24 will be 17,500;
- Continued to work with partners to identify the most vulnerable people in our communities and provide them with suitable advice and interventions;
- Education and awareness of the correct siting and fitting of smoke alarms in people's homes to prevent unnecessary activations and false alarms also continued;
- NWFRS has continued to promote regular testing of smoke alarms using all media platforms;
- Endeavours continued to ensure our advice provided details and actions to be taken if a fire starts or a smoke alarm activates in the home;
- Educationalists continued to promote smoke alarm ownership and testing as part of the delivery across North Wales schools.



7 False Alarms

7.1 In the 2022/23 financial year, there were 2,673 false alarms; a 6.2% increase from 2,517 in the previous financial year. There was a 9.7% increase in AFAs from 1,398 to 1,534. False alarms made with good intent increased slightly, from 1,076 to 1,087.



Category	Year	Q1	Q2	Q3	Q4	Year-to-Date (YTD)	% change YTD	Average of 3 previous years	% change YTD / Average of 3 previous years
Total false alarm	2022-23	671	787	606	609	2,673	↑ 6.2%	2,369	↑ 12.8%
	2021-22	595	702	592	628	2,517			
AFA	2022-23	417	420	360	337	1,534	↑ 9.7%	1,275	↑ 20.3%
	2021-22	311	403	345	339	1,398			
False alarms made with good intent	2022-23	240	352	237	258	1,087	↑ 1.0%	1,052	↑ 3.3%
	2021-22	278	287	235	276	1,076			
Malicious	2022-23	14	15	9	14	52	↑ 20.9%	41	↑ 26.8%
	2021-22	6	12	12	13	43			

*The final two columns show: the average of the 3 previous financial years (based on the equivalent reporting period); the percentage change based on the difference between the current financial year and the 3-year average.

Narrative

- **2,673** Total False Alarms attended (increase of 6.2%);
- **1,534** Total Fire alarm due to apparatus (AFA) (increase of 9.7%);
- Fire alarm due to 'apparatus' represented 57.4% of total False Alarms.

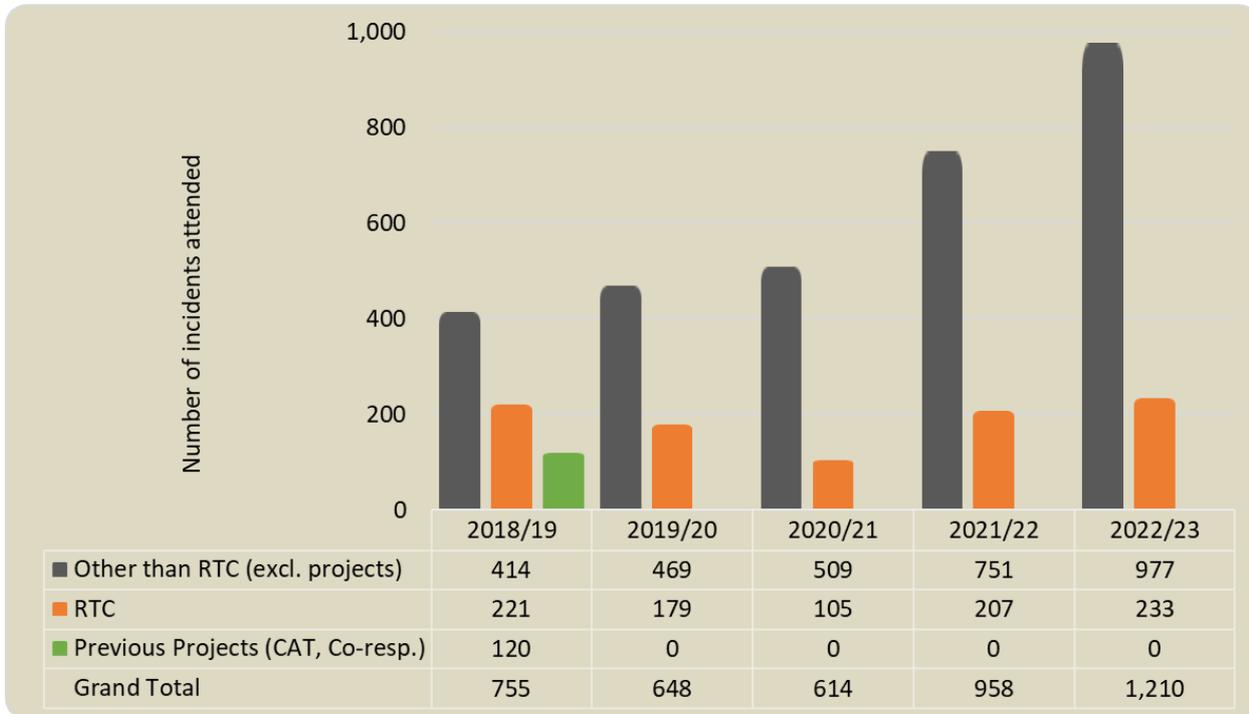
What we have done:

- **AFAs in dwellings** – The Service conducted a targeted approach to fire prevention during the financial year to keep the most vulnerable people safe in our communities, which included working with care providers by installing care line systems (this may increase the number of AFAs we attend in dwellings, but each attendance will give us an opportunity to provide further, often bespoke safety advice). We will continue to monitor AFAs in dwellings next year by:
 - Continuing to review the daily incident log by Partnership Managers in the areas to spot any emerging trends and/or repeat calls to the same premises;
 - Continuing to work with care line providers ensuring call monitoring staff have the appropriate training and review if required e.g. new starters;
 - Continuing to provide safety advice when NWFRS attend AFAs in dwellings;
 - Continuing to make referrals to external agencies when further specialist support is identified and needed.
- **AFAs in non-residential** - We have worked with BCUHB to try and reduce the number of actuations, and support BCUHB's plan to reduce AFAs in the future, which we will continue to monitor during the coming year;
- **AFAs in 'other residential'** - As above, work is ongoing to support BCUHB to reduce AFA activations in care settings. We are also working with higher education establishments to reduce AFAs through targeted Prevention campaigns.

8 Special Service Calls



8.1 Special service calls increased 26.3% to 1,210 during the 2022/23 financial year, compared with 958 in 2021/22. Road traffic collisions increased 12.6% from 207 to 233, whilst 'Other than RTC' incidents increased 30.1%, from 751 to 977. (The rise in SSCs attended was expected following the Service's decision to increase visibility in the community).



Category	Year	Q1	Q2	Q3	Q4	Year-to-Date (YTD)	% change YTD	Average of 3 previous years	% change YTD / Average of 3 previous years
Total special service calls	2022-23	327	371	267	245	1,210	↑ 26.3%	740	↑ 63.5%
	2021-22	152	233	315	258	958			
Road traffic collisions (RTC)	2022-23	53	65	60	55	233	↑ 12.6%	164	↑ 42.1%
	2021-22	31	56	68	52	207			
Other than RTC	2022-23	274	306	207	190	977	↑ 30.1%	576	↑ 69.6%
	2021-22	121	177	247	206	751			

*The final two columns show: the average of the 3 previous financial years (based on the equivalent reporting period); the percentage change based on the difference between the current financial year and the 3-year average.

Narrative

1,210 special service calls attended (26.3% increase);

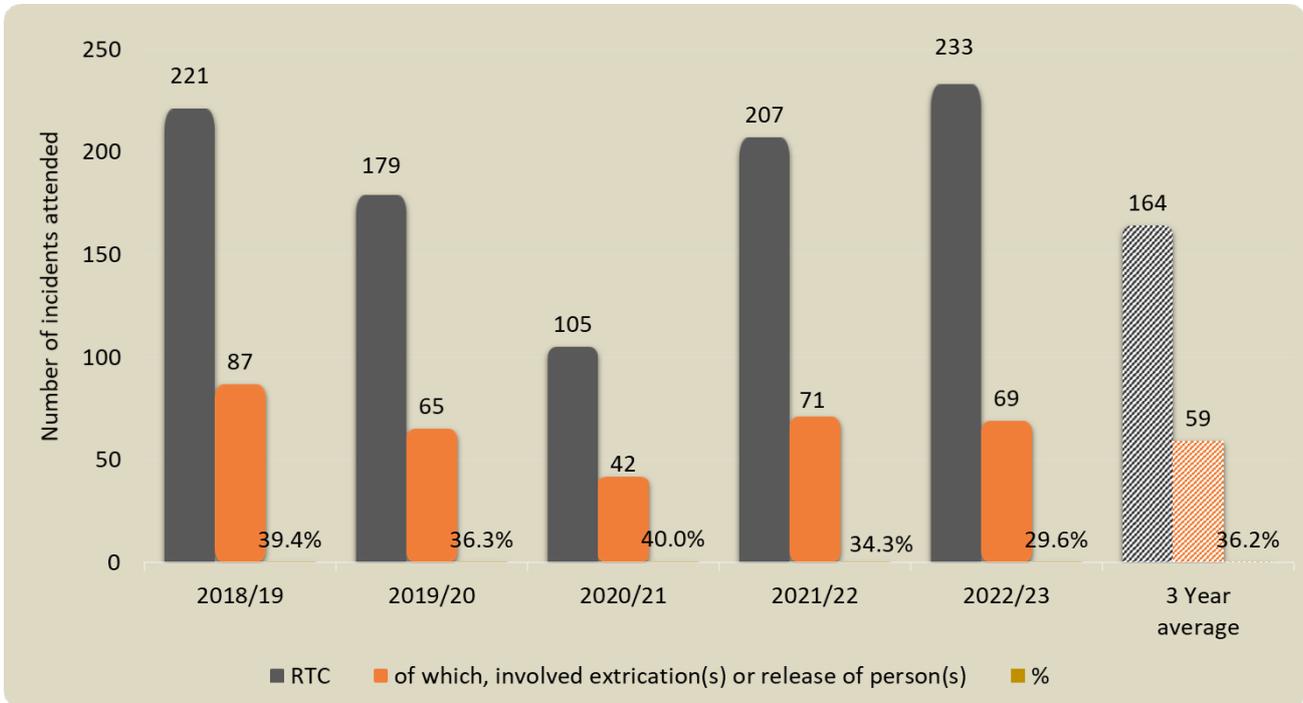
977 Other than RTC (excl. projects) (increase of 30.1%).

- The reason for NWFRS's increased attendance to SSCs is a result of a conscious decision taken by the organisation to change the approach and be more proactive in responding to requests for assistance which would not typically require a Fire and Rescue Service response. This has resulted in being more visible in the community.
- The number of RTCs attended increased to 233 and were higher than the 3-year average of 164. It should be noted that the number of visitors to the area, especially during the summer months, was significant during 2022 (release from all Covid-19 restrictions).
- 'Olivia's Story' continued to be delivered in collaboration with NWP. Over 2,500 young people have now been given the presentation.
- NWFRS is a stakeholder and key participant of the North Wales Road Safety Group, supporting the delivery of interventions where required.

9 Road Traffic Collisions and Extrications/Release



9.1 Out of the 233 road traffic collisions attended in the 2022/23 financial year, 69 (29.6%) involved the Service using equipment to extricate at least one casualty from the vehicle. Whilst 129 incidents resulted in injuries, the majority of casualties sustained only slight injuries.



233	RTC incidents attended
129	incidents where people sustained injury
69	incidents involved extrication / release

Severity of Injury *	Number of people
Precautionary check	49
First Aid	31
Injuries - Slight	87
Injuries - Serious	58
Fatalities	9
*RTC injuries - where available are recorded in the IRS in the same categorisation as fire injuries	

Narrative

233 RTCs attended, a 12.6% increase from 207;
69 (29.6%) involved extrication / release of persons.

Despite the increase in RTCs attended, there was a reduction in the percentage of extrications required by NWFRS crews. The increase in visitor numbers (road traffic) in North Wales during the summer of 2022 was the likely reason for the increase of RTCs.

Action taken to reduce the number of road traffic collision:

- 'Olivia's Story' was delivered in collaboration with NWP. Over 2,500 young people have now been given the presentation;
- NWFRS Prevention staff continued to attend the North Wales Road Safety Group;
- NWFRS, in partnership with WAST and NWP, remains part of the 'Deadly Impacts' intervention that details the consequences of a road traffic collision (RTC) (death and serious injuries).



10 Monitoring against Improvement and Well-being objective 1:

1.1 To support people to prevent accidental dwelling fires and stay safe if they do occur.

10.1 Safe and Well Checks

The Service completed 18,052 Safe and Well Checks during 2022/23, of which 5,733 (31.8%) were undertaken in response to a referral from a partner agency.



Category	Year	Q1	Q2	Q3	Q4	Year-to-Date (YTD)	Change YTD	Average of 3 previous years	Change YTD / Average of 3 previous years
% of all Safe and Well Checks undertaken that originated from a referral from a partner organisation	2022-23	35.2%	30.2%	31.7%	30.1%	31.8%	↓ 8.4%	32.9%	↓ 3.3%
	2021-22	39.5%	34.5%	34.6%	32.1%	34.7%			

*The final two columns show: the average of the 3 previous financial years (based on the equivalent reporting period); the percentage change based on the difference between the current financial year and the 3-year average.

Reporting Period: April 2022 – March 2023

Narrative

18,052 SAWCs completed of which: -

6,162 (34.1%) referrals were high priority, with 3,487 coming from a partner agency;

2,992 (16.6%) were Medium Priority SAWCs;

8,898 (49.3%) were Low Priority SAWCs.

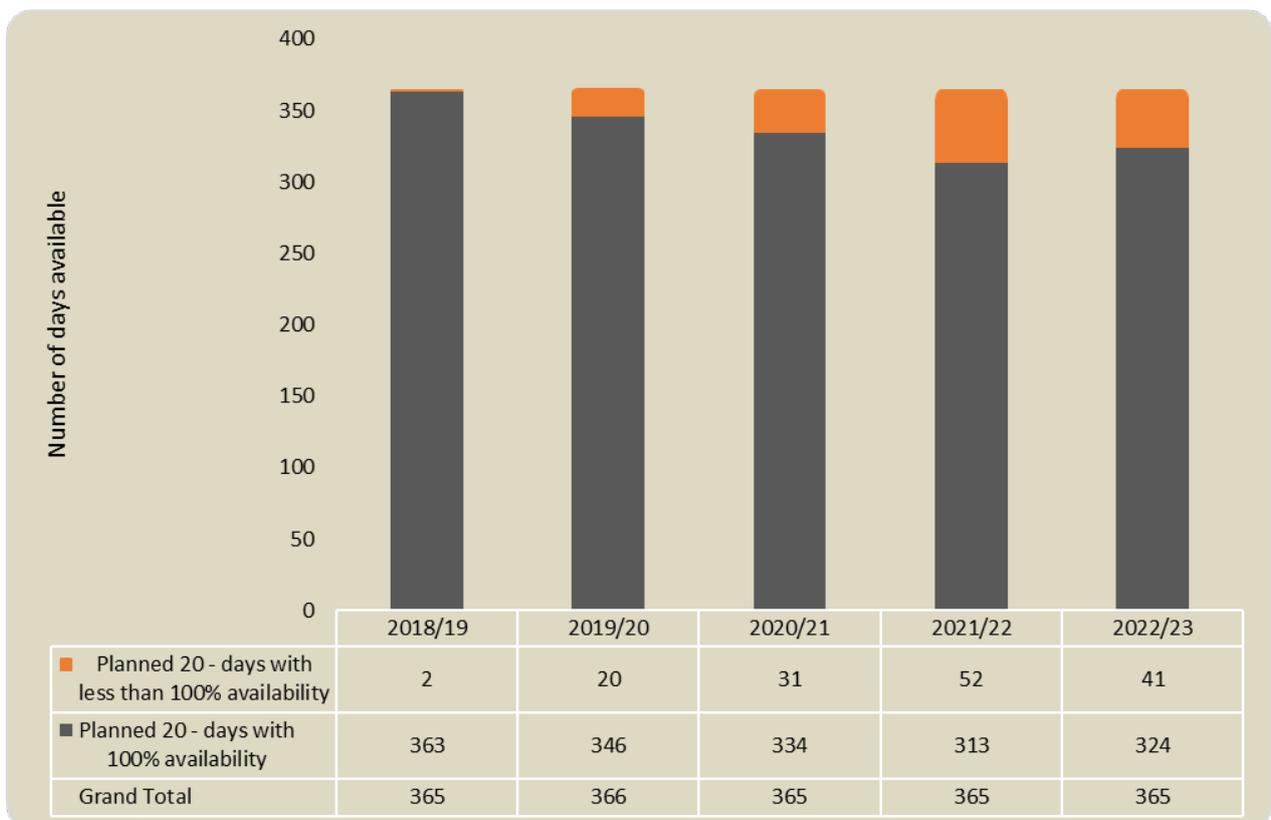
Action taken to improve performance & comments:

- The target of 20,000 SAWCs was not achieved. However, given the financial pressures the Service now finds itself under, the Fire Safety department has seen a reduction of 2.5 Home Safety Support Worker (HSSW) posts (approved 16th January 2023 FA meeting), a long term HSSW vacant post not filled, and some periods of sickness absence which have had an impact to the target;
- There was a return to pre Covid-19 SAWC activity following positive re-engagement work with our partner agencies;
- SAWCs were delivered as previously referred to in the report, including via telephone, where appropriate;
- Prevention campaigns and safety advice in line with our CSG and Corporate Communications campaign calendar continued;
- Re-engagement of the previous High priority project continued and involved all WT, DC, and WDSR crews;
- Bespoke interventions continued to be provided to the most vulnerable in the community;
- The array of interventions issued to occupiers continued to grow, including innovative equipment such as Stoveguards;
- SAWC targets to increase for all Day Crewed and Wholetime watches (12 to 15/shift) from 1st April 2023.

11 Planned 20 Stations Availability

11.1 NWFRS has 44 fire stations with 54 response pumps, as 8 stations have 2 pumps and Wrexham has 3. Pre-planning takes place each day to deploy resources to ensure 20 are made available between 0600 and 1800. Short notice changes can sometimes result in a reduction that cannot be immediately rectified.

During 2022/23, the number of times the threshold of 20 was met increased 3.5% to 324 days (88.8%) compared with 313 days (85.8%) in 2021/22. From 1st April 2023, the Fire Authority has agreed the minimum will be 18.



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. 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.

Report to	Executive Panel
Date	19 June 2023
Lead Officer	Stewart Forshaw, Deputy Chief Fire Officer
Contact Officer	Anthony T. Jones, Area Manager
Subject	Emergency Cover Review Update



PURPOSE OF REPORT

1. To provide members with an update on the progress and activities of the Emergency Cover Review since the overview report presented on 20 March 2023.

RECOMMENDATION

2. That Members:
 - i. Note the contents of this report and the progress made by the Emergency Cover Working Group.

BACKGROUND

3. Audit Wales undertook a review of "Corporate Resilience in North Wales Fire and Rescue Authority" in April 2021 and made the following proposal for improvement: "To support resilience the Authority should review station locations to identify opportunities to optimise emergency response arrangements."
4. In addition, the Chief Fire Officer's (CFO) situational assessment presented to Authority Members on 20 September 2021 highlighted a number of key risks facing the Authority. In summary, these were associated with maintaining sufficient availability of on-call fire crews; ensuring sufficient resources to maintain and develop firefighter skills; and having enough corporate capacity to meet current and future demand.
5. In response to the CFO's assessment, Authority members agreed to initiate a programme of reviews into key critical areas including emergency response cover.

6. To assist the Service in the review of its Emergency Response, an independent company (ORH) with vast experience in examining emergency cover has been appointed. ORH is assisting the Authority during its decision-making process to provide solutions for a fair and sustainable emergency response and resilience across the whole of North Wales, considering future demand, risks and budget.

INFORMATION

7. A representative Working Group of Fire Authority Members, the 'Emergency Cover Review Working Group', was established comprising six Fire Authority Members, one from each Unitary Authority. Details of potential improvements to availability and emergency response and resilience will be examined by the Working Group prior to recommendations being made to the Full Fire Authority.
8. The first meeting of the Emergency Cover Review Working Group took place on 14 March 2023. During this meeting, Members received a presentation by Officers and ORH consultants. This was to introduce the purpose of undertaking an Emergency Cover Review and the methodology to be used. The report to the Executive Panel on 20 March 2023 outlined the information presented to the Working Group.
9. Working Group meetings were scheduled for 4 April 2023, 2 May 2023 and the 5 June 2023, with the option for a final meeting in late June if required.
10. At the meeting of the Emergency Working Group Working Group on 4 April, Members were presented with four potential options that were discussed in detail. It was also explained that there is currently a predicted £6.0 million deficit in the financial planning for 2024/25 that will need to be considered when deciding the future of emergency cover and response in North Wales Fire and Rescue Service. (NWFRS).
11. The four options presented were as follows:
 - **Option 1.** A model that maintains our current station profile with an increase of up to 3 additional day staffed stations which would require an increase in costs.
 - **Option 2.** A model which maintains our existing station locations but redistributes staff and allows an increase of 5 day-staffed stations which would be cost neutral.
 - **Option 3.** A model which also keeps our station locations and redistributes staff which allows an increase of 3 day-staffed stations.
 - **Option 4.** A model which keeps our wholetime station locations and includes an additional day-staffed station but closes 5 on-call stations.

12. In April 2023, the Service engaged The Consultation Institute (tCI), a not for profit, well-established institute, promoting high-quality public and stakeholder consultation in the public, private and voluntary sectors. They have been used by many Fire and Rescue Services in the UK including Mid and West Wales. The Institute provides qualified peer review and a Certificate of Consultation Readiness to ensure that NWFRS is adopting best practice in line with a Consultation Charter and that any full public consultation is delivered to the required standard.
13. Best practice pre-consultation activities include listening to the views of others via focus groups and workshops, analysing who may be impacted by future plans and to what extent, analysing the risks involved with all proposed plans, and ensuring adoption of the right methods of communicating and engaging with all stakeholders so they can get involved and help shape, review and agree any proposal to potentially take to full consultation.
14. Following the Certificate of Consultation Readiness and subject to meeting the required standards, the Institute will provide certification that the Service's consultation planning and activities have been Independently Quality Assured to a standard that meets the requirements of the Consultation Charter and assurance framework.
15. At a meeting of the Emergency Cover Review Working Group on 2 May, the potential options were discussed in more detail utilising information provided by the independent consultant ORH, answering Members' questions from their previous meetings in March and April.
16. Officers also presented an update on the Authority's pre-consultation activity and the feedback received from the various stakeholders that has included blue light partners, community groups, local authorities, staff and representative bodies.
17. Further analysis and modelling to support a more effective and efficient response was presented to members of the Emergency Cover Review Working Group at its meeting on 5 June 2023.
18. The Service continues with its pre-consultation activities with guidance and support from the Consultation Institute, to ensure consultation readiness in time for any potential full consultation process from July to September 2023.

IMPLICATIONS

Well-being Objectives	Any options must meet the Authority's obligations under the Well-being of Future Generations (Wales) Act 2015
Budget	No budgetary implications at this stage, however any proposed changes to Emergency cover will have implications for both capital and operational budgets in future years
Legal	Any options must meet the Authority's obligations under the Fire and Rescue Services Act 2004
Staffing	No decision has been made yet which will impact on staff
Equalities/Human Rights/ Welsh Language	The impact of these aspects will be assessed at the appropriate point in the development of the Emergency cover proposals through integrated and equality impact assessments.
Risks	Reduces the risks of not being able to set a balanced budget and respond to emergencies effectively and efficiently in the communities of North Wales.

Report to	Executive Panel
Date	19 June 2023
Lead Officer	Stuart Millington, Assistant Chief Fire Officer
Contact Officer	Stuart Millington, Assistant Chief Fire Officer
Subject	Audit Wales – False Alarms Reduction



PURPOSE OF REPORT

1. To provide members with an overview of the findings following a recent audit of false fire alarms that was undertaken by Audit Wales.

EXECUTIVE SUMMARY

2. Between November 2022 and March 2023, Audit Wales reviewed North Wales Fire and Rescue Authority's (the Authority) approach to the reduction of false fire alarms, focussing primarily on its approach to attendance at non-domestic premises.
3. The question posed that the review sought to answer was: **Is the Authority doing all that it can to reduce the prevalence and responses to non-domestic fire false alarms?**
4. The audit team found that: **The Authority has significantly reduced the number of non-domestic false fire alarms it attends but needs to address financial risks and capacity issues to ensure its risk-based approach is sustainable.**
5. Whilst recognising that the Authority is addressing the issue of false alarm reduction in non-domestic premises well, the report makes three recommendations about how this could be further improved.
6. The first recommendation relates to how the Authority is able to demonstrate the impact of false fire alarms from a financial perspective, to include enhanced data capture and analysis to ensure that efficiencies are correctly realised and presented.
7. The second recommendation focusses on how Automatic Fire Alarm (AFA) data can be integrated or provided to others, as well as how it can add value specifically to the work of Business Fire Safety teams.
8. The third and final recommendation relates to building resilience into how false fire alarms are managed, set against a context of significant organisational capacity challenges.

RECOMMENDATIONS

9. It is recommended that Members:
 - i) note the content of the Audit Wales False Fire Alarms reduction report.

BACKGROUND

10. Between November 2022 and March 2023, staff members at different levels from across North Wales were asked a series of questions with a clear focus on the efforts that had already been made, as well as where potential existed to further reduce the number of occasions when a resource was unnecessarily mobilised to a false alarm in a non-domestic setting.
11. Similar audits were completed of both Mid and West Wales Fire and Rescue Authority and South Wales Fire Authority.
12. Audit Wales provided a draft report to officers and comments were submitted for consideration. These comments mostly focussed on making a clearer differentiation between false alarms in non-domestic and domestic properties.
13. Audit Wales developed a log of these comments and have subsequently provided a response as to where changes to the document have been made and where North Wales Fire and Rescue Service (the Service) observations have been noted, accepted or partially accepted.

INFORMATION

14. The audit considered all false alarms related policy, how it was developed and how it is currently being implemented; as well as how false alarm reduction is monitored and evaluated.
15. The report provides both a summary and a detailed report, with the detailed report referencing
 - How the fire and rescue services are facing the most challenging financial and operational environment in a generation;
 - What a false fire alarm is and why reductions are important; and
 - How false alarms are managed by North Wales Fire and Rescue Authority.
16. In relation to financial and operational challenges, the report describes Welsh Governments' aspirations for a reduction in false alarms in order to release resources and capacity.
17. It also reflects how any resulting increase in capacity could be better utilised, as part of a broader firefighter role or to improve the time available for firefighters to maintain their own operational competencies.

18. In the section regarding what a false alarm is the Home Office Incident Reporting System (IRS) categories for false alarms are described. The information that is shown in this section reflects the positive work that has been undertaken over a number of years to challenge those who may place malicious calls to the Service, but also highlights that the largest proportion of false alarms result from faulty automatic fire alarm systems.
19. A point to note here is that this will also include false alarms in domestic settings. False alarms in domestic settings are out of scope for this review and there is no desire to reduce attendance to incidents of this type, as they assist our staff to get over the thresholds and provide support to those who are most at risk from fire.
20. The report goes on to highlight financial implications of unnecessary attendance at false fire alarms, whilst also identifying the complexities of accurately quantifying any real terms savings. Examples are provided of when Services in England have begun to recover costs through charging for attendance to those who are chronic repeat offenders.
21. Environmental and road safety implications of attendance at incidents when not required are also described.
22. The final section of the report examines the current policy that NWFRS employs, as well as performance data that describes a significant reduction since 2015/16, with a cautionary note to point out slight increases in 2021/22. Again, we must recognise that this section refers to an increase in domestic and non-domestic properties collectively. Nevertheless, there is a need to continuously monitor any increases, specifically in non-domestic settings.

False fire alarms reduction – North Wales Fire and Rescue Authority

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Mae'r ddogfen hon hefyd ar gael yn Gymraeg. This document is also available in Welsh.

Contents

The Authority has significantly reduced the number of non-domestic false fire alarms it attends but needs to address financial risks and capacity issues to ensure its risk-based approach is sustainable

Summary report	4
Detailed report	7
Fire and rescue services face the most challenging financial and operational environment in a generation	7
What are false fire alarms and why are they important?	9
Managing false alarms at North Wales Fire and Rescue Authority	15
Appendix 1	22

Summary report

Summary

What we reviewed and why

- 1 We reviewed the Authority's approach to the reduction of false fire alarms, focusing primarily on its approach to attendance at non-domestic premises. Our audit included reviewing the Authority's policy, how it was developed and is being implemented, how false alarms are monitored, and how performance is managed and evaluated.
- 2 We examined false alarms due to the significant numbers responded to by Welsh Fire and Rescue Authorities (FRAs). This means that they have a significant operational, financial, and environmental impact. They are also a key area for improvement within the Fire and Rescue National Framework 2016¹, set by the Welsh Government.
- 3 We undertook the review during the period November 2022 to March 2023.

What we found

- 4 Our review sought to answer the question: **Is the Authority doing all it can to reduce the prevalence and responses to non-domestic fire false alarms?**
- 5 Overall, we found that: **The Authority has significantly reduced the number of non-domestic false fire alarms it attends but needs to address financial risks and capacity issues to ensure its risk-based approach is sustainable.** We reached this conclusion because:
 - the Authority demonstrates a good understanding of the locations, causes and impacts of false fire alarms in non-domestic premises.
 - the Authority has a well-embedded policy to address false fire alarms in non-domestic premises and has revised its approach to reflect evolving risks.
 - the Authority closely monitors responses to automatic fire alarms and works with partners to address problem premises.
 - the Authority's policy has resulted in a dramatic reduction in the number of false fire alarms it responds to. However, numbers have steadily increased since 2015-16 and Members need to scrutinise future performance in the face of challenging financial pressures.

¹ [Fire and Rescue National Framework 2016, Welsh Government](#)

Recommendations

Exhibit 1: recommendations

The table below sets out the recommendations that we have identified following this review.

Recommendations	
Demonstrating the impact of false fire alarms	
R1	<p>This report highlights opportunities to build on the Authority’s understanding of the impact of false fire alarms on its use of resources. To address this, we recommend that the Authority:</p> <ul style="list-style-type: none">• updates its financial analysis to capture the impact of responding to false alarms across its services.• in quantifying the impact of responding to false alarms, analyse and report of the impact of attending false alarms looking at hours lost by wholetime and on-call crews in attendance. This will help to support strategic decisions on the growing role of firefighters and help to inform the Authority’s future approach to maintaining firefighters’ competency.• as part of its performance reporting framework, report on the number of automatic fire alarm (AFA) actuations that do not elicit an emergency response under its current policy, including as a proportion of all AFA actuations. This will help the Authority to demonstrate the impact of its current policy.• reviews the avenues by which false alarm data is captured (e.g. post-incident forms, control information) to ensure information is captured accurately and consistently.
Improving integration	
R2	<p>We found limited clarity on how data on AFA actuations (both the ones that elicit an emergency response, and those that do not) is used by business fire safety teams. We recommend that the Authority includes data on all non-domestic AFA actuations as part of its development of new data dashboards, and provides appropriate access to business fire safety teams. This will help to improve the use of intelligence to proactively inform the workload of business fire safety teams.</p>

Recommendations

Building resilience

- R3 The final part of this report highlights capacity challenges which threaten to undermine the effectiveness of the Authority's risk-based approach to managing false alarms. We recommend that the Authority reviews Members' development needs and tailors training opportunities accordingly to support their role in scrutinising performance and supporting improvement.

Detailed report

Fire and rescue services face the most challenging financial and operational environment in a generation

National framework expectations

- 6 The Welsh Government's National Framework for Fire identifies the reduction of false alarms as a key efficiency saving available to FRAs². It notes that responding to false alarms incurs significant financial and opportunity costs, both for FRAs and building occupiers, whilst yielding no benefit whatsoever. This is especially impactful as there are more false alarms than actual fires. In 2021-22, 47% of total incidents attended by the Authority were false alarms, illustrating the significant burden they place on the limited resources available. Consequently, the Welsh Government requires FRAs to 'Identify the main sources of false alarms and take all reasonable and practical steps to reduce their incidence'.
- 7 In shaping their approach, FRAs must also demonstrate the Sustainable Development Principle under the Well-being of Future Generations 2016. FRAs are required to show how they are taking a long-term view to improvement that focuses on prevention, involving people, and integrating and working collaboratively with key partners and stakeholders.
- 8 Therefore, the expectation of the Welsh Government is to see a reduction in responses to false alarms in order to free both resources and capacity. This would also put FRAs in a stronger position to realise Welsh Government's wider ambitions for fire and rescue services in Wales.

Growing the role of the firefighter

- 9 Reducing false alarms is required to provide the additional capacity needed to meet the Welsh Government's policy expectations. Since the National Framework was published in 2015, the Welsh Government have set out a broader policy direction for FRAs. This involves expanding the role of firefighters to support the health and social care system, such as responding to non-injured falls. This was approved by the Cabinet in 2020.
- 10 In 2021, the Welsh Government published its assessment of whether the role of firefighters could be expanded without causing detriment to the core fire and rescue service. Even without delivering a broader role, the review concluded that a 'fundamental review of station work routines is required to ensure that activity is appropriately scheduled to maximise output'. Analysis found that there was no unallocated capacity during the day shift of wholetime crews, which would coincide

² [Welsh Government, Fire and Rescue National Framework 2016, November 2015](#)

with peak hours of demand for the Welsh Ambulance Service Trust (WAST) between 7am and midday.³

- 11 A lack of adequate training time was also identified by the Welsh Government and led to a second thematic review focused on operational training⁴. It concluded that there was insufficient training time available, particularly to firefighters under the Retained Duty System (RDS). The report recommended that FRAs 'undertake an unconstrained analysis of the amount of time required for firefighters to train'.
- 12 Given the broad impact across the service, a reduction in false alarms responses can help increase capacity, which is needed to help grow role of the fire fighter. This is alongside other requirements, such as leadership from senior officers and members, effective collaboration, robust data analysis, and effective scrutiny.

Reductions in resources

- 13 FRAs have had to deliver within significantly reduced budgets during years of austerity and, as all public bodies, must continue to adapt to respond to the current financial pressures. Consequently, Authorities have had to maintain their services with fewer resources and have long focused on rebalancing their emphasis from responding to incidents, to preventing fires and improving safety.
- 14 In real terms, the Authority experienced a 6.3% decrease (£2.6 million) in revenue expenditure between 2009-10 and 2021-22⁵. Over the same period, the calls received by the Authority decreased by 27.6%⁶ and the number of incidents attended reduced by 38.2%⁷. The number of staff employed by the Authority also fell by 15.6% between 2009-10 and 2021-22 (**Exhibit 2**):

³ Welsh Government, [Broadening of the role of firefighters in Wales](#), November 2021

⁴ Welsh Government, [Thematic review of operational training within the Welsh Fire and Rescue Services](#), October 2022

⁵ StatsWales, [Revenue outturn by authority](#)

⁶ StatsWales, [Calls handled by fire control watch FTE by call type and financial year](#)

⁷ StatsWales, [Fires, Special Service Incidents and False alarms attended by Fire and Rescue Services in Wales](#)

Exhibit 2: North Wales FRA personnel headcount by employment type, 2009-10 to 2021-22

Role	2009-10	2020-21	Change
Wholetime uniformed staff	294	278	-5.4%
Retained staff	556	429	-22.8%
Fire control staff	33	30	-9%
Non-operational staff	151	136	-9.9
All staff	1,034	873	-15.6%

Source: [StatsWales](#)

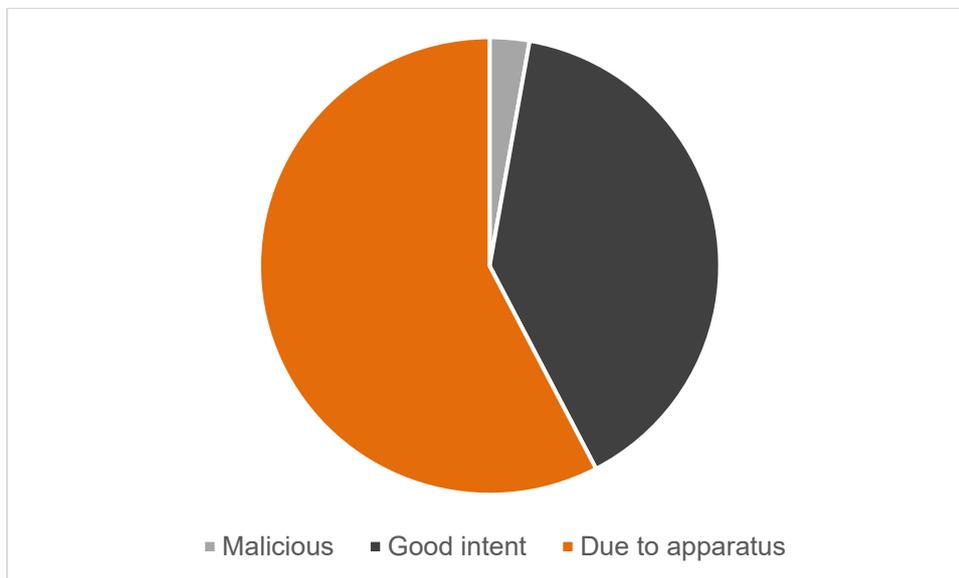
What are false fire alarms and why are they important?

Definition and types

- 15 Within the Home Office Incident Reporting System (IRS), false alarms are categorised into three types:
- **Malicious** – a call made with the intention of getting a response to a non-existent fire-related event.
 - **Good intent** – a call made in good faith that a response would be needed.
 - **Due to apparatus** – a call initiated by a fire alarm or firefighting equipment (including accidental initiation).
- 16 **Exhibit 3** shows that, nationally, false alarms ‘due to apparatus’ account for just under 60% of total false alarms.⁸

⁸ Note – this includes both domestic and non-domestic false alarms responded to due to how data is reported.

Exhibit 3: share of total false alarms in Wales by type, 2021-22



Source: [StatsWales](#)

17 These are typically caused by Automatic Fire Alarm systems (AFAs), which are networks of detector heads in buildings that are linked to an alarm system. The alarms are linked to Alarm Receiving Centres (ARCs). Due to technology not requiring on-site management, ARCs can be located anywhere in the world. However, ARCs are required to register with each FRA in the areas they operate within. **Exhibit 4** sets out the AFA process when activated.

Exhibit 4: automatic Fire Alarm Process



Source: Audit Wales

18 When a false alarm is received via an AFA, it is typically referred to as an Unwanted Fire Signal (UwFS). As UwFS form the largest share of false alarms, they are the key focus of reduction activity across the UK⁹. Consequently, the

⁹ For example, see the [National Fire Chiefs Council guidance](#)

focus of the Authority's approach and this audit has been on UwFS reduction, whilst also covering other types of false alarms.

False alarms impact the resilience of Fire and Rescue services

- 19 As with any response made by the Authority to any incident, there are financial, operational, environmental, and safety impacts when responding to false alarms.
- 20 Taken together, the impacts of responding to false alarms are significant and highlight the importance of having an effective approach to reduce their prevalence. As a result, any improvement in performance in this context can help the Authority to better manage its resource pressures and increase capacity to undertake additional training and other priority tasks.

Financial

- 21 The total financial impacts of a false alarm response are difficult to quantify precisely. In most cases, the cost of deploying an appliance to attend a false alarm would be similar if not identical to that of a genuine incident, as crews are deployed in the expectation of a genuine fire. This varies by Authority based on various factors, such as geography, but other UK FRAs estimate the cost of attendance to be around £350-400 per hour¹⁰. Using their estimates, the total financial cost for North Wales FRA responding to the total number of false fire alarms received in 2021-22 would be between £900,000 and £1 million.¹¹
- 22 In North Wales, the Authority has not quantified the cost of responding to false fire alarms in recent years. When changing its AFA response policy¹² in 2014, the Authority applied a notional cost of £81.50 per AFA false alarm attended, to help calculate the potential financial impact. This was based on the salary cost of a crew of four firefighters with a watch manager to respond and attend an incident for one hour. Using this cost calculator, the financial impact of responding to AFAs in the years preceding the policy change were noted as: £158,273 (2011-12), £150,367 (2012-13) and £142,951 (2013-14).
- 23 The cost impact in rural areas is easier to quantify accurately, using call-out fees for retained duty system (RDS) crews as the basis. In reality, however, the majority of false fire alarms occur in urban areas where stations are either wholetime or day crewed. Indeed, the Authority estimated in 2014 that just 15% of the AFAs it responded to were from its RDS stations.

¹⁰ For example, Devon and Somerset FRS' standard charge of £364.27 or Buckinghamshire FRS estimate of £305 plus VAT.

¹¹ This notional calculation is based on published data which includes domestic and non-domestic false alarms.

¹² Paragraph 37 describes the Authority's policy.

- 24 The Authority estimated that its change in policy in 2014 would result in a cost saving of £25,000. This is based on the demand on RDS stations alone (i.e. around 15% of the overall number of false alarms). This reflects a limited consideration of the impact on its resources. Despite the policy paper highlighting the financial impact beyond that on its RDS stations, it stopped short of setting how the difference between its estimated cost saving of £25,000 and the wider financial cost of responding to AFAs (circa £150,000 per annum) would be accounted for. For example, by setting out how the savings resulting from its policy change could be used – e.g. investment in equipment, training or a further contribution to addressing budget shortfalls.
- 25 To counter the financial impact of responding to false alarms, some FRAs in England have prescribed charges for premises that produce multiple false alarms. For example, Cleveland FRS charge premises £345 (excluding VAT) from their fifth call.¹³ Similarly, Humberside FRS charge a minimum of £365.75 from the fourth false alarm.¹⁴

Operational

- 26 Responding to false alarms causes unnecessary disruption. This highlights the importance of reducing attendance. It can divert people from training, prevention work, or premises familiarisation, which are all critical tasks for a crew to maintain operational capability. Disruptions to training are particularly costly, as highlighted by the Welsh Government's most recent report¹⁵, which notes a risk of staff competencies not being maintained where crews are regularly responding to false alarms.
- 27 The operational impact is potentially significant for retained firefighters, whose capacity to attend training is less compared to wholetime crews. Typically, retained firefighters receive two to three hours of training per week, which may be removed entirely if required to respond to false alarms during training hours.
- 28 In addition, as the RDS model relies on the goodwill of employers to release staff to attend a call during their work hours, increasing responses to false alarms risks deterring businesses from supporting their staff to take on a RDS role. This may negatively affect staff retention.

Environmental

- 29 As set out in our report into Carbon Emissions Reduction report¹⁶ in 2021-22, there are significant environmental impacts incurred in delivering fire and rescue services. This includes the use of fuel for a response, as well as the environmental

¹³ Cleveland FRS, [Fire Alarms](#)

¹⁴ Humberside FRS, [Call out charges 2022-23](#)

¹⁵ Welsh Government, [Thematic review of operational training within the Welsh Fire and Rescue Services](#), October 2022

¹⁶ [Carbon emissions reduction in North Wales FRA](#), Audit Wales, March 2022

impact of firefighters travelling to their station. Given that 47% of all the incidents attended by the Authority in 2021-22 were false fire alarms¹⁷, it is an area where a significant reduction in carbon emissions could be made.

Safety

- 30 False alarm reduction is crucial to reducing safety risks. The prevalence of false alarms also has potentially significant impacts on the safety risks of communities, such as road risk and complacency.
- 31 Road safety risks are present whenever the emergency services respond to an incident. Driving at speed or under blue light conditions can generate significant risks to both crews and other road users. This risk is also present at road speed, due to the significant size and weight of fire appliances.
- 32 High volumes of false alarms can also lead to complacency among building occupants and citizens. For example, it may lead to a lack of response during a real incident, placing both the occupants and the responding crew at increased risk. False alarm reduction, therefore, helps to reduce the safety risks to both the Authority’s crews and communities.

What others are doing

- 33 FRAs across the UK have devised different solutions to address the volume of false alarms. They are a significant burden on the local stations and limit the time that can be spent on other issues. Home Office research¹⁸ found that 63,000 hours were wasted in England during 2017-18 due to responding to false alarms.
- 34 As a result, English fire and rescue services have developed a range of approaches to help reduce the number of false alarms attended, which vary in their usage (**Exhibit 5**).

Exhibit 5: example approaches taken by English FRAs in 2018

Approach	Description	Proportion of English FRAs adopting the approach in 2018
Call challenging	Where fire control staff ask questions to those making a call to confirm if a fire is real to prevent a first response.	93%
Education and information initiatives	Information or materials are given to building occupants on the need to reduce false alarms.	93%

¹⁷ [Fires, Special Service Incidents and False alarms attended by Fire and Rescue Services in Wales \(gov.wales\)](#)

¹⁸ Home Office, [Trends in fire false alarms and fire false alarm policies](#), November 2022

Approach	Description	Proportion of English FRAs adopting the approach in 2018
No confirmation needed	A normal response is sent without confirmation.	76%
Adapted responses	An immediate response is made but reduced from the Pre-Determined Attendance (PDA), e.g., one appliance is sent to investigate rather than three.	74%
Requiring confirmation (or 'double knock')	A response is only sent if a call to confirm a fire is received, or if multiple alarms are triggered.	60%
Enforcement action	A legal enforcement action is taken against premises that often trigger false alarms, such as a fire safety audit or fine.	33%
Fines	A monetary charge is made for premises with repeat false alarms.	24%
Non-attendance	After a warning, no response is made to premises that repeatedly trigger false alarms.	13%

Source: [Home Office research](#)

- 35 The National Fire Chiefs Council has published a toolbox¹⁹ to support FRAs with their management of false alarms and the potential options to be considered. These include:
- no response being made to AFAs during daytime hours unless there is a higher level of risk (e.g. sleeping risk or high-risk premises like a hospital).
 - charging the occupants of a building that repeatedly cause UwFS.
 - requiring premises to register their AFAs to enable enhanced monitoring to help call handlers make better informed decisions.
 - establishing thresholds for an adapted response based on the number of detector heads in a building (e.g. a building with 500 heads would get a full response with ten UwFS whilst a building with 100 heads would not).
 - prioritising work on educating and informing people of their responsibilities and having dedicated officers to help facilitate change in buildings/organisations with high numbers of false alarms.
 - engagement with ARCs to improve call handling and encouraging bodies to undertake visual checks to confirm there is a fire.
- 36 Both the toolbox and research demonstrate the breadth of approaches available to FRAs, reflecting their local circumstances and risk appetite.

¹⁹ National Fire Chiefs Council, [Unwanted fires signals toolbox](#)

Managing false alarms in North Wales FRA

Current policy

- 37 The Authority has a clear and well-embedded policy to determine its attendance at automatic fire alarms. It will not send an emergency response to automatic fire alarm actuations unless a back-up 999 call is received confirming that there is a fire. There are exemptions which will elicit a response. These are:
- all residential property – where the responsibility for the safety of the occupiers rests with the individuals who reside there – HMP Berwyn, hospitals, sheltered housing and houses in multiple occupation will continue to receive a response.
 - other sleeping accommodation and schools – such as care homes, hostels, all schools and colleges, hotels and halls of residence will be exempt between the hours of 8pm and 8am. During these hours, they will respond to automatic fire alarm calls.
 - all Control of Major Accident Hazards (COMAH) sites²⁰ in North Wales which will continue to receive a response as usual.
 - the Authority's Control department also holds a list of other commercial/industrial premises where an attendance will be made. The application of exemptions is overseen by the Head of Fire Safety.
- 38 The current iteration of the Authority's policy was adopted in September 2022, following a review. The review centred on an evolving risk profile due to changes in building occupancy as a result of the pandemic. For example, a reduced likelihood of someone being present in a public building who would normally be expected to make a back-up 999 call to confirm a fire. Apart from reviewing some exemptions, the current policy broadly reinforces the approach adopted in 2014. Prior to 2014, the Authority responded to all automatic fire alarms with little or no challenge.

Current performance

- 39 The Authority's 2014 policy resulted in a dramatic reduction in the number of false fire alarms it attends. Although responses to false alarms still represents a significant proportion of all incidents attended by the Authority, **Exhibit 6** shows that the total number of incidents has fallen over time. The Authority responds to around 700 fewer false alarms compared to 10 years ago; a 22% reduction.

²⁰ COMAH sites are sites covered by the Control of Major Accident Hazards (COMAH) Regulations 2015. The regulations cover any establishment storing or otherwise handling large quantities of hazardous industrial chemicals.

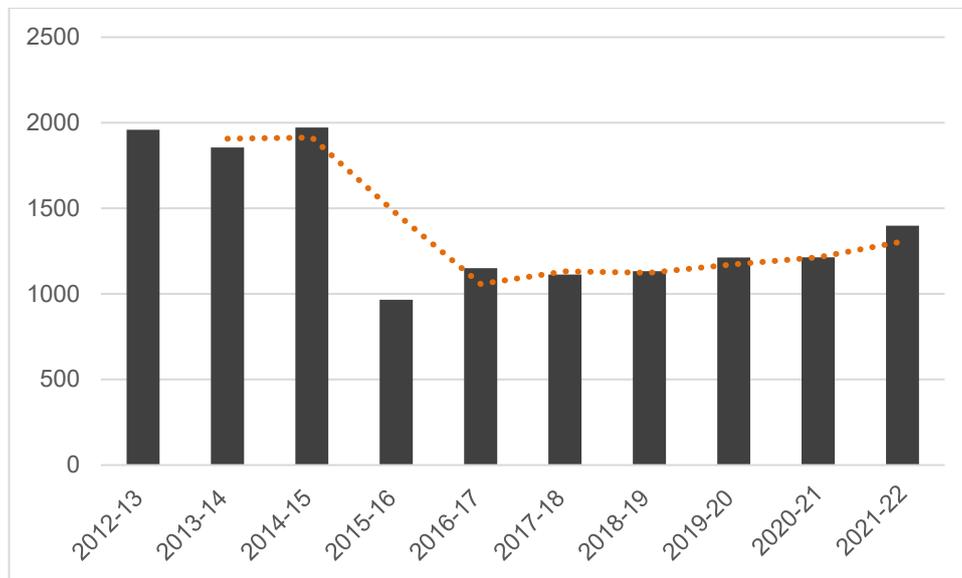
Exhibit 6: all false alarms attended by the Authority over the last 10 years

	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22
All incidents attended (includes FFAs)	6,803	6,356	6,099	4,879	5,348	5,733	5,300	4,872	4,699	5,354
FFAs attended	3,229	3,088	3,203	1,975	2,124	2,102	2,256	2,263	2,302	2,506
FFAs as a proportion of all incidents	47%	49%	53%	40%	40%	37%	43%	46%	49%	47%

Source: [Fires, Special Service Incidents and False alarms attended by Fire and Rescue Services in Wales \(gov.wales\)](#)

40 The impact of the 2014 policy change is clearly demonstrated by data on the Authority’s attendance at fire alarms caused by apparatus activation. **Exhibit 7** shows that the Authority responded to 1,972 false alarms of this type in 2013-14, the year preceding its policy change. In the following year operating to the new policy (2014-15), this reduced to 966. Although the data includes both domestic and non-domestic AFAs, it shows a significant reduction in false alarms demonstrating the positive impact of its policy. In addition, performance has been sustained since 2014 with the number of false fire alarms responded to during 2021-22 some 29% lower compared to 10 years ago. However, numbers have steadily increased since 2015-16, highlighting the need to regularly review and monitor attendance.

Exhibit 7: false alarms due to apparatus (domestic and non-domestic), over a 10 year period



Source: [False alarms by reason and financial year \(gov.wales\)](https://gov.wales)

Understanding the challenge

- 41 The Authority has a good understanding of the location, cause and impact of false fire alarms in non-domestic premises. Officers clearly and consistently articulate the impacts of false alarms. These include:
- the impact on training and development opportunities and the risks around maintaining competency, especially for a largely retained operational workforce;
 - the issues around availability and capacity, and how responding to false alarms risks crews' capacity to attend a genuine emergency;
 - enhanced road risks in relation to emergency response; and
 - risks around public complacency, affecting how people may respond to a genuine emergency.
- 42 However, the Authority's understanding of the environmental and financial impact of responding to false alarms is less developed. As described above (paragraphs 21-23), it has been some time since the Authority quantified and updated its assessment of the financial impact of responding to false alarms. If the Authority is to effectively meet the Welsh Government's ambitions around broadening the role of the firefighter in future, it will need to demonstrate a firmer grasp on the impact of false alarms on its resources, including both wholtime and retained staff.
- 43 Positively, the Authority is learning from its previous approach to reducing attendance at false alarms. **Exhibit 7** shows that, since the initial dip following the introduction of its 2014 policy, attendance at false alarms due to apparatus have increased by 45% between 2015-16 and 2021-22. In reviewing its approach, the

Authority found that its policy may have been applied too stringently initially, and the list of exempted properties has increased over time as its understanding of risk has developed. In addition, officers described the impact of an increasing number of new housing developments now being built with AFA systems as standard – for example, new homes built with hard wired smoke alarms and multi-occupied buildings with systems that cover communal areas.

- 44 The Authority regularly reviews false alarm attendance and has a good understanding of the type of organisations generating the biggest demand in this respect. For example, a report to the Authority’s Service Leadership Team in November 2022 highlighted the number of false alarms and reasons for actuation. This included an analysis of the 152 AFA actuations in non-domestic properties in second quarter of 2022-23. Of these, 134 were in hospitals. This is reflective of the key challenge facing the Authority in reducing false alarms – the biggest generator by far is the health board.
- 45 The Authority has good systems to record and measure the volume and nature of false fire alarms. For example, its internal platforms facilitate reporting on false alarms to enable detailed information to be captured and shared with colleagues in the health board to help identify trends. Building on this, officers we interviewed highlighted ongoing projects to develop real time data dashboards to help to equip and empower local teams to manage responses informed by more granular data.
- 46 Despite this positive development, data dashboards are only as good as the information being inputted. In this respect, we found opportunities to improve how the Authority records data. For example, there are inconsistencies in how the Authority is capturing data when appliances are recalled to station while enroute. Other examples include inconsistencies in how post-incident forms are completed by response crews following false alarm attendances.
- 47 There are also some varying interpretations of what constitutes a ‘false alarm’ – for example, depending on your perspective, a recent pattern of incidents leading to AFA actuations at HMP Berwyn in Wrexham could be described as fires, arson incidents, or false alarms. Agreeing the definitions and ensuring consistency in how data is captured will give the Authority greater confidence in using data to inform future approaches to reduce false alarms.
- 48 At the time of our audit, we found scope to improve how the Authority captures and uses data on AFA actuations that fall outside of its response policy (e.g. low risk commercial properties). Reporting on the number of calls the Authority has not responded to, coupled with more robust financial data, would help it to better demonstrate the impact of its policy over time. Furthermore, patterns in AFA actuations are important to monitor even if the Authority does not respond. Such patterns can indicate a poorly managed property in the context of fire safety. And the risk of false alarms causing public complacency still applies, regardless of whether the Authority responds.

Tackling problem premises

- 49 Although the extent to which the Authority engaged and involved wider stakeholders in shaping its 2014 policy is unclear, the change in approach was well communicated at the time, helping to ensure a smooth transition. Promotional literature targeted those who would be affected by the change and the communications planning helped the Authority to prepare for any negative backlash.
- 50 As the main source of AFA false alarms across the region, the Authority has a good approach to working with the health board to reduce the number of actuations. Officers demonstrate an excellent understanding of the main causes of AFA actuations in these problem premises, using granular data to support detailed analysis of the main causes of in hospital sites. The sharing of information is symptomatic of the good working relationships between the Authority and the estates teams in Betsi Cadwaladr University Health Board. This is important because, having decided against the principle of pursuing enforcement action in problem premises, the Authority relies on good working relationships to influence change.
- 51 Despite the positive relationships, however, the pace of change by partners is slow and the health board continues to generate a significant number of false alarms. Changes to the Authority's pre-determined response reflect the pressures this causes. For example, to reduce the impact on its resources, the Authority's daytime response consists of sending just one appliance to hospitals following an AFA actuation, in anticipation of it being a false alarm. This is a tricky balance and relies on the Authority's risk appetite – if there is a large fire in a hospital, it's unlikely that a single appliance would be able to tackle it, and the delay until a second appliance arrives could be significant. The Authority's risk appetite does not extend to exploring this further, for example by applying the same logic as the basis for not sending any appliances in response to AFA actuations in hospitals.

A sustainable approach?

- 52 Overall, our review has found that the Authority has a good, risk-based approach to managing false alarms. However, the key difficulties facing the Authority are centred around its capacity to maintain its current approach and continue to resource its services to reflect risks. In this respect, and given the significant demand they continue to place on the Authority, false alarms cannot be perceived as an isolated issue and must be considered alongside the wider challenges facing the Authority.
- 53 The Authority is on a journey of change and the new leadership has led to a number of thorny issues being tabled. This includes:
- a wholesale Emergency Cover Review across North Wales. As described above, capacity is impacted significantly by the high proportion of false alarms attended by the Authority. In the context of increasing expectations

and diminishing resources, it is important that the Authority accurately quantifies the impact of false alarms to support future options appraisals.

- the Authority's asset base, including the number and location of fire stations. This is inherently linked to the review of fire cover across the region, and reflects the Auditor General's recent review of the Authority's corporate resilience. Our report highlighted that its fire stations are not always located in the best location to maintain service resilience with the changing role and expectations being placed on fire and rescue services.²¹
- difficulties in recruitment and retention impacting on on-call availability, in the context of a delivery model heavily weighted towards retained firefighters. Recruitment was paused during the pandemic, and thereafter the Authority has struggled to meet its recruitment targets for on-call firefighters. Officers highlighted that reducing attendance at false alarms can be perceived as a barrier in this respect, because much of the potential financial savings are directly linked to call-out fees. Again, this highlights the importance of accurately quantifying staff capacity, to inform strategic decisions on the "redeployment of human and other resources... to more productive tasks".²²
- an investment in new training facilities. Significant investment is needed to develop a new training centre in North Wales to support firefighters' competency. Firefighters' capacity to attend training and development is affected by false alarms and this needs to be captured in the context of its investment in new facilities.
- new governance structure and the evolving culture of the organisation. The Authority has recently established a new governance structure within the officer cadre, with a view to improving performance focus and help devolve decision making and scrutiny of performance at all appropriate levels.

54 This is a challenging agenda, set against a backdrop of current and future budget shortfalls. However, despite being presented with performance information on false alarms, our review of the minutes of full Authority and Audit Committee meetings over the last two years found little evidence of Members actively seeking to challenge performance on false alarms to help support financial and operational improvement.

55 The Authority's limited resilience in the context of false alarms is exemplified by its approach to business fire safety. Whilst it has a good approach to reduce attendance at AFAs, its decision to not attend a large proportion of false alarms inevitably increases the emphasis on fire safety colleagues responding in a different way. For example, by identifying patterns of occurrence and proactively inspecting fire safety procedures, or following up through the work of business education colleagues. Paragraph 48 of this report highlights opportunities to strengthen the links between AFA actuations data and the workloads of business

²¹ [Corporate resilience in North Wales Fire and Rescue Authority, Audit Wales, May 2021](#)

²² This expectation is set out in the Welsh Government's [Fire and Rescue National Framework 2016](#)

fire safety colleagues. However, we found that there are barriers to do this, not least the limited scope to increase workloads within the current structure, with teams already at capacity.

Appendix 1

Audit approach and methodology

Audit approach

Our approach was to understand the Authority's approach to fire false alarm reduction, focusing in particular on non-domestic settings. The review sought to answer the question 'Is the Authority doing all it can to reduce the prevalence and responses to non-domestic fire false alarms?'. Our focus was on the actions of the Authority, not the actions available to building managers or responsible people.

We completed our fieldwork across all three Fire and Rescue Authorities separately, using the same team across all three. This enabled insights to be drawn into each Authority, as well as informing a forthcoming national output.

We sought to be flexible to fit around officers when organising and delivering our fieldwork, ensuring that our work did not detract from the operational work of the Authority.

Methodology

Our review was completed between November 2022 and March 2023. We used a range of methods to draw conclusions for our review:

- document review – we reviewed policies and documentation provided by the Authority, as well as reviewing their published information, such as their website. In addition, we also reviewed documentation from the Welsh Government, NHS Shared Services Partnership (NWSSP), and representative groups.
- data analysis – we analysed both data provided by the Authority and publicly available data. This included management data, Incident Recording System (IRS) data, and other available data from StatsWales.
- local interviews – we interviewed officers nominated by the Authority that covered a range of different areas, both corporately and locally. This included the lead officer for false alarms, Business Fire Safety (BFS) officers, and senior officers.
- national interviews – we interviewed representatives of local health boards, the NWSSP, and the National Fire Chiefs Council (NFCC).
- survey – we designed a survey for building managers and responsible people to gauge their views of false alarms and the Authority. We encouraged the Authority to send this to organisations in their area, as well as promoting it through professional networks, such as the NHS Estate Managers group. Unfortunately, too few responses were made to use this evidence to draw conclusions.



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Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg a Saesneg.

Report to	Executive Panel	
Date	19 June 2023	
Lead Officer	Stewart Forshaw, Deputy Chief Fire Officer	
Contact Officer	Anthony Jones, Head of Corporate Planning, Performance and Transformation	
Subject	Strategic Risk Management	

PURPOSE OF REPORT

1. To summarise the content of North Wales Fire and Rescue Authority's (the Authority) strategic risk register in accordance with the Strategic Risk Management Policy.

EXECUTIVE SUMMARY

2. Departmental plans and risk registers for 2023-2024 have been reviewed with Heads of Departments including risks associated to the delivery of their objectives after mitigation.
3. These risks have been scored 1-25, categorised as Very High, High, Medium and Low and collated into a combined list of 74 departmental risks.
4. To collate the Strategic Risk Register, the 74 departmental risks have been grouped into 8 themes in Fig1 which mirror the departmental score to identify the cumulative risk to the organisation.
5. The areas of highest risk to the organisation being cyber-attack, financial challenges, impact of climate change, the recruitment and retention of sufficient staff to maintain an effective and efficient response and any disruption to the IT systems in use by all departments.

RECOMMENDATIONS

6. That Members:
 - i) note the identified strategic risks that are facing the Authority.

BACKGROUND

7. The Authority's adopted Strategic Risk Management Policy defines strategic risk as "an event that, should it occur, would impact on the achievement of the Authority's planned outcomes and/or the delivery of its core functions".

8. The Authority's Strategic Risk Register lists known risks that could potentially prevent the Authority from achieving its planned outcomes and/or delivering its core functions. Register entries are ascribed risk scores that are regularly re-evaluated by officers to reflect the current state and the predicted effect of planned countermeasures.
9. Under this policy, the Executive Panel receives a summary report on strategic risks at least twice a year. Between times, the Chair and Deputy Chair of the Authority are able to view the full detail of the register with Officers.
10. The Strategic Risk Register records both current risk levels and future risk levels, based on an assumption that planned countermeasures will have had the desired effect.
11. Risk levels are based on an evaluation of the likelihood that something might happen and the consequences if it did. Descriptions are provided for information at Appendix 2.

INFORMATION

12. Officers continue to review and update the risk register, adding, removing and re-scoring risks as appropriate. As a minimum this is undertaken during the quarterly updates to departmental plans and risk registers.
13. A summary of the current register entries is provided at Appendix 1.

IMPLICATIONS

Well-being Objectives	Maintaining the register and taking action to manage risk increases the likelihood that the Authority's well-being objectives will be achieved.
Budget	Maintaining the register helps prioritise spending decisions that would reduce risk levels.
Legal	Maintaining the register helps to ensure the Authority's compliance with laws that define its functions and how it operates.
Staffing	No specific implications identified.
Equalities/Human Rights/Welsh Language	No specific implications identified.
Risks	An accidental release of the register could expose the Authority to harm.

Appendix 1

Strategic Risk Register

1. A total of 74 risks are included in Departmental Plans and risk registers for 2023-24 which are collated into 8 themes which form the basis for identifying their overarching risk to the organisation:

Risks from Departmental Plans and risk registers for 2023 -2024 grouped into Strategic Themes

Strategic Risk Ref	Risk	Very High 20-25	High 12-16	Medium High 8-10	Medium Low 4-6	Low 1-3	Total from dept. plans
1	Cyber Attack	1	3				4
2	Financial		4	12	1		17
3	Climate		1				1
4	Legal			5	2		7
5	Reputational			5	1		6
6	Response			1	6		7
7	Staffing resource		4	13	7		24
8	Supply Chain			2			2
9	IT Systems		1	2	4		6
Totals		1	13	39	21	0	74

2. Details of the Very High and High Risks and their countermeasures are as follows:
 - i. Only one overarching risk scores as Very High, this being around cyber security. With proactive work continuing to reduce the likelihood. This could reduce to High when Cyber Essential accreditation is achieved.

Very High Risk	Countermeasures
Cyber-attack and data breaches relating to Information, Communications and Technology	<ul style="list-style-type: none"> • Continual monitoring of global threats and review of cyber security defences. • Progress towards achieving CE (Cyber Essential) and CE+ (Cyber Essentials Plus) accreditation. • Endeavor to attract personnel with the requisite skillset to support compliance with best practice. • Conduct preventative maintenance and review resilient technologies. • Policies in place for Agile Working, Systems and Data security.

- ii. The 13 High Risk identified by Departments in relation to delivering their objectives are grouped within the 4 Strategic Risk themes below and are likely to remain at High, despite the below countermeasures.

Strategic Risk	Countermeasures
Impact of climate change, including demand on resources and environmental challenges with estate and vehicles.	<ul style="list-style-type: none"> • Governance structure in place to monitor and report. • Environment and Sustainability Strategy in place. • Develop our staff and provide training facilities/opportunities, to enable them to respond safely and effectively to emergencies as a result of climate change.
Financial challenges arising from insufficient funds to deliver core services or to maintain risk-critical systems. This includes risks linked to Pension changes following recent rulings and the impact of changes following the revoking of EU law	<ul style="list-style-type: none"> • Budget already allocated in the Capital programme with all variations to be approved by the SPOC. • All Wales technical lead for Pensions to be appointed to support the Senior Pensions Officer to process changes arising from the pensions legislation changes with audit process in place. • Continue collaboration of partnership work with NWFRA. • Continue dialogue with Welsh Government and Local Authorities particularly around grant funding. • Ensure Business Continuity Plans are in place and regularly reviewed. • Monitor changes to employment law that could impact on increased budget pressure following the revoking of EU law.
Maintain service delivery across the whole of North Wales, considering the specific challenges of recruitment and retention in rural areas and the maintenance of skills through the delivery of effective training and development activities.	<ul style="list-style-type: none"> • Develop and implement improved, effective and efficient response standards through the Emergency Response Review Project. • Proactively recruit on rural stations with continuous efforts to recruit the right staff in the right place to provide cover at the right time. • Prioritisation of workloads and upskilling/training of staff. • Mentoring and coaching staff where possible to enhance resilience. • Work to reduce single points of success and knowledge silos including continuing to recruit against vacancies. • Review lessons learned from planning for industrial action in 2022/23.

	<ul style="list-style-type: none"> • Ensure Business Continuity Plans are in place and regularly reviewed covering loss of staff in all departments. • Review the delivery of operational training and development, producing recommendations for improvement. • Monitor changes to employment law that could impact on increased budget pressure following the revoking of EU law.
<p>Disruption or loss of IT systems bespoke to departments and/or the wider service</p>	<ul style="list-style-type: none"> • Work to ensure there are replacement contracts with suitable suppliers to maintain systems and migrate to alternatives. • Ensure all relevant staff are suitably and sufficiently trained. • Ensure Business Continuity Plans are in place and regularly reviewed.

Risk analysis

LIKELIHOOD	5 Almost certain	5	10	15	20	25
	4 Likely	4	8	12	16	20
	3 Possible	3	6	9	12	15
	2 Unlikely	2	4	6	8	10
	1 Very unlikely	1	2	3	4	5
		1 Insignificant	2 Minor	3 Moderate	4 Significant	5 Major
		CONSEQUENCE				

Risk priority scale

Value	Priority scale
20-25	Very high - risk is intolerably high
12-16	High - risk is substantial
8-10	Medium high - risk is moderate
4-6	Medium low - risk is tolerable
1-3	Low

Report to	Executive Panel
Date	19 June 2023
Lead Officer	Stuart Millington, Assistant Chief Fire Officer (Environment)
Contact Officer	Tim Christensen, Environment and Climate Change Manager
Subject	Environmental Strategy 2023-2030



PURPOSE OF REPORT

- 1 Following a discussion with Members in three Environmental and Sustainability working group meetings, an Environmental Strategy for the period 2023-2030 has now been developed. It consolidates our existing legal and policy commitments relating to environmental management, and sets out how we propose to meet them.

RECOMMENDATION

- 2 It is recommended that Members:
 - i) note the content of the report; and
 - ii) endorse the proposed Environmental Strategy for the period 2023-2030 for approval at the Full Authority meeting on 17 July.

BACKGROUND

- 3 Three Working Groups for Fire Authority Members have now taken place; on 14 March, 4 April and 2 May 2023. During these meetings, Members were given a presentation by the Environment and Climate Change Manager, introducing the concept of an Environmental Strategy, outlining recommendations for what should be included, and finally presenting a draft text for comment and review.
- 4 The Well-being of Future Generations (Wales) Act 2015 requires public bodies to consider the long-term impacts of decisions in a number of ways. The relevant duties to the preparation of an environmental strategy for the Service fall under the heading 'A Resilient Wales':
 - 1) **Biodiversity and Soil** Maintain and enhance the natural environment through managing land appropriately to create healthy functioning ecosystems
 - 2) **Natural Green Space** Support social resilience and community well-being
 - 3) **Knowledge of Nature** Increase awareness of the importance of a biodiverse natural environment with healthy functioning ecosystems

- 4) **Water and Air Quality** Support ecological resilience, making the environment healthier for wildlife and people
- 5 The Environment (Wales) Act 2016 sets out an ambition for the Welsh Government to reduce emissions of greenhouse gases in Wales to net zero by the year 2050.
- 6 In accordance with this duty, the Welsh Government has prepared a series of interim carbon budgets, including under Carbon Budget 3 (CB3) an ambition for the Welsh public sector to be net zero carbon by 2030.
- 7 The Service is a signatory to the Emergency Services Environment and Sustainability Group (EESG) Sustainability Charter, which sets out the following relevant commitments:
 - 1) Work towards net zero carbon emissions through improving the energy efficiency of our estate and sustainable business and personal travel.
 - 2) Improve resource efficiency and adopt circular economy approaches to reducing waste and save money.
 - 3) Restore and enhance local biodiversity through considered management of our estates.
 - 4) Adapt to inevitable climate change through proactively managing our ability to respond to extreme weather events and changes to service demand.
 - 5) Take action to avoid or mitigate pollution of water courses.
 - 6) Minimise our reliance on fossil fuels by actively seeking to generate renewable energy at our sites, and through the adoption of greener technologies and fuels for our fleet.

INFORMATION

- 8 As a Fire and Rescue Service, it is important that we recognise the importance of protecting and preserving our natural environment for future generations. Our actions have a direct impact on the environment and we have a duty to reduce our environmental footprint and promote sustainability in all areas of our operations.
- 9 The proposed Environmental Strategy outlines our commitment to reducing our environmental impact. This will include implementing sustainable practices in our daily operations, reducing our carbon emissions, and promoting environmental awareness amongst our staff and members of the community.

- 10 The Strategy sets out a number of detailed plans to be developed over the coming financial year, detailing specific measures and timescales for implementation in a number of areas, including procurement, fleet, and our station estate.

IMPLICATIONS

Well-being Objectives	Direct implication for agreeing the steps towards meeting one of the Authority's long-term improvement and well-being objectives
Budget	The proposed Environmental Strategy will have implications for both capital and operational budgets within each financial year to calendar year 2030.
Legal	Supports compliance with improvement planning, well-being and environment legislation
Staffing	No known impact on staffing levels
Equalities/Human Rights/ Welsh Language	The impact of specific actions on these aspects will be assessed at the appropriate point in their development
Risks	Reduces the risks of legal non-compliance and of failing to budget and plan appropriately

Awdurdod Tân ac Achub Gogledd Cymru

North Wales Fire and Rescue Authority

Environmental Strategy 2023-2030

May 2023

Mae'r ddogfen yma ar gael yn y Gymraeg
This document is also available in Welsh

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**Gwasanaeth Tân ac Achub
Fire and Rescue Service**

Contents

	<i>Page</i>
1.0 Introduction.....	1
2.0 Policy Context	2
2.1 Legislation.....	2
2.2 National Targets	2
3.0 Measuring Progress.....	4
3.1 Overview	4
3.2 Targets.....	4
4.0 Sustainability in the Community.....	5
4.1 Overview	5
4.2 Targets.....	5
5.0 Sustainable Procurement	6
5.1 Overview	6
5.2 Targets.....	6
6.0 Energy Consumption.....	7
6.1 Overview	7
6.2 Targets.....	7
7.0 Water Consumption	8
7.1 Overview	8
7.2 Targets.....	8
8.0 Operational Activities	9
8.1 Overview	9
8.2 Targets.....	9
9.0 Waste and Recycling.....	10
9.1 Overview	10
9.2 Targets.....	10
10.0 Fleet.....	11
10.1 Overview	11
10.2 Targets.....	11
11.0 Biodiversity.....	12
11.1 Overview	12
11.2 Targets.....	12

1.0 INTRODUCTION

- 1.0.1 As a Fire and Rescue Service, we recognise the importance of protecting and preserving our natural environment for future generations. We understand that our actions have a direct impact on the environment and we are committed to reducing our environmental footprint and promoting sustainability in all areas of our operations.
- 1.0.2 This Environmental Strategy outlines our commitment to reducing our environmental impact. This includes implementing sustainable practices in our daily operations, reducing our carbon emissions, and promoting environmental awareness amongst our staff and members of the community.
- 1.0.3 We are dedicated to being a responsible and sustainable organisation, and we pledge to continuously review and improve our environmental performance. This strategy has been prepared in order to provide a clear path for the Service to meet its environmental and sustainability obligations for the period to calendar year 2030, setting out clear policies and benchmarks against which progress may be measured.
- 1.0.4 North Wales Fire and Rescue Service provide fire protection and prevention services to around 687,000 people over a geographical area of 2,400 square miles, as well as hundreds of thousands of tourists and visitors who come to North Wales every year. There are around 328,742 domestic properties and 33,820 non-domestic properties under NWFRS' protection and the Service employs almost 1,000 staff in operational and support roles.
- 1.0.5 The Service covers three geographical areas, Gwynedd and Anglesey (West), Conwy and Denbighshire (Central) and Wrexham and Flintshire (East), with an estate of 47 buildings, ranging from whole-time, day-crewed, retained and community fire stations, administration offices, a garage workshop to sharing premises with North Wales Police and the Welsh Ambulance Service Trust. NWFRS attend around 1,879 fires, 958 Special Service Incidents, and around 2,517 false alarms of various kinds every year.

2.0 POLICY CONTEXT

2.1 Legislation

2.1.1 The Well-being of Future Generations (Wales) Act 2015 requires public bodies to consider the long-term impacts of decisions in a number of ways. The relevant duties to the preparation of an environmental strategy for the Service fall under the heading 'A Resilient Wales':

- 1) **Biodiversity and Soil** Maintain and enhance the natural environment through managing land appropriately to create healthy functioning ecosystems
- 2) **Natural Green Space** Support social resilience and community well-being
- 3) **Knowledge of Nature** Increase awareness of the importance of a biodiverse natural environment with healthy functioning ecosystems
- 4) **Water and Air Quality** Support ecological resilience, making the environment healthier for wildlife and people

2.1.2 The Environment (Wales) Act 2016 sets out an ambition for the Welsh Government to reduce emissions of greenhouse gases in Wales to net zero by the year 2050.

2.1.3 In accordance with this duty, the Welsh Government has prepared a series of interim carbon budgets, including under Carbon Budget 3 (CB3) an ambition for the Welsh public sector to be net zero carbon by 2030. This is binding on the Welsh Government as a whole, and not specific public bodies.

2.1.4 Section 6 of the Environment (Wales) Act 2016 places a duty upon the Service to report on biodiversity and resilience of ecosystems within its estate every three years from the end of 2019.

2.1.5 The Service is a signatory to the Emergency Services Environment and Sustainability Group (EESG) Sustainability Charter, which sets out the following relevant commitments:

- 1) Work towards net zero carbon emissions through improving the energy efficiency of our estate and sustainable business and personal travel.
- 2) Improve resource efficiency and adopt circular economy approaches to reducing waste and save money.
- 3) Restore and enhance local biodiversity through considered management of our estates.
- 4) Adapt to inevitable climate change through proactively managing our ability to respond to extreme weather events and changes to service demand.
- 5) Take action to avoid or mitigate pollution of water courses.
- 6) Minimise our reliance on fossil fuels by actively seeking to generate renewable energy at our sites, and through the adoption of greener technologies and fuels for our fleet.

2.2 National Targets

2.2.1 As a Public Sector Organisation, it is important to be aware of and consider both local and national environmental improvement targets.

2.2.2 Environmental targets have been set by Welsh Government within key strategies including 'One Wales: One Planet' and 'Towards Net Zero Waste'. These outline targets for the reduction in greenhouse gases and waste to landfill which puts a requirement on both Public and Private sector organisations to measure and

reduce these emissions year-on-year.

- 2.2.3 The Welsh Government aspire to be the first Refill Nation with the aim of reducing single-use plastic bottles.
- 2.2.4 In 2018, DEFRA published its 25-year Environmental Plan which outlines targets in relation to clean air, water, biodiversity, sustainable resource consumption, minimising waste, biosecurity and enhancing the natural environment.

3.0 MEASURING PROGRESS

3.1 Overview

- 3.1.1 Measuring progress is at the core of our environmental strategy. It allows the Service to track progress towards our specified targets and identify areas where we can improve.
- 3.1.2 In Section 3.2.1 (below) we outline how we will develop the key indicators that the Service will use to measure its progress in reducing its environmental impact. These indicators will focus on areas such as energy consumption, waste reduction and carbon emissions, and will be used to set targets and track progress over time.
- 3.1.3 By regularly monitoring and reporting on these indicators, the Service will be able to ensure that it is on course to environmental objectives and make any necessary adjustments.

3.2 Targets

3.2.1 We will measure our progress by:

- Establishing a carbon emissions baseline, against which we can measure progress in reducing our carbon footprint
- Following the Targets set out in this Strategy – with progress being reported in departmental / corporate improvement plans and reviewed regularly by the Environment and Sustainability Working Group
- Adopting an Environmental Management System to a recognised standard (such as ISO:14001 or Green Dragon)
- Preparing a monthly Environmental KPI dashboard
- Submitting a quarterly environmental update to the Land and Property Committee
- Submitting annual carbon emissions audits to Welsh Government
- Preparing a Biodiversity Report and Action Plan every three years

4.0 SUSTAINABILITY IN THE COMMUNITY

4.1 Overview

- 4.1.1 As a public body, we endeavour to have a positive presence in the community we serve and give opportunity for the involvement of the public where possible. Throughout the year, fire stations hold their own Open Days for their local community, hold school visits and open their doors to community project groups.
- 4.1.2 The Service carries out extensive work with schools, businesses and local communities to promote fire safety and prevention. The potential for serious damage to our environment, often in sensitive areas, by the impact of countryside fires is a serious concern, the impact of deliberate fire setting undermines social and economic confidence and draws on resources which could be utilised more effectively elsewhere.
- 4.1.3 Reducing arson helps to protect and maintain the quality and on-going viability of the environment and places where we live, work, learn and spend our leisure time.
- 4.1.4 It is important to educate and raise awareness about the impact of arson on the environment. We should encourage sustainability and environmental education when visiting schools in an attempt to highlight the amount of deliberate fires in the community.

4.2 Targets

- 4.2.1 Over the period of this strategy we will:
- Promote community safety to prevent fires and other incidents from occurring
 - Deliver the Wales Arson Reduction Strategy objectives
 - Deliver the objectives set out in our three-yearly Biodiversity Report and Action Plans
 - Seek and develop inter-agency partnerships in accordance with the Future Generation Well-being Goals and the Environment (Wales) Act 2016
 - Engage with schools and colleges within the Service area to raise awareness of the dangers of fire

5.0 SUSTAINABLE PROCUREMENT

5.1 Overview

- 5.1.1 Sustainable procurement is the process of acquiring goods and services that meet the needs of the present without compromising the ability of future generations to meet their own needs. It is a key component in social responsibility and environmental stewardship.
- 5.1.2 As a responsible public service, we recognise the importance of sustainable procurement and are committed to implementing a comprehensive policy that promotes environmental, social and economic sustainability. We aim to minimise the environmental impact of our operations, support the local communities we serve, and promote fair labour practices.
- 5.1.3 By collaborating with other Fire and Rescue Services and public sector organisations within Wales we aim to improve our performance in areas of sustainable procurement, with the aim of implementing best practice standards for the Welsh public sector.
- 5.1.4 We endeavour to collaborate and benchmark against other emergency services and public sector organisations in order to measure our performance and ensure continuous improvement. All procurement activity over agreed levels is undertaken by North Wales Police on behalf of the Service.
- 5.1.5 As a service, we ensure supplies, services and works are not only procured in accordance with public sector regulations, but also in a way that allows Small to Medium Enterprises (SMEs) to develop. This is a key element of our Social Value obligation under the Well-being of Future Generations Act (2015). As a public body, we seek to make our procurement process more sustainable and therefore commit to the Value Wales Public Sector Sustainable Procurement Programme.

5.2 Targets

- 5.2.1 Over the period of this strategy we will:
- Work with WRAP Cymru and/or similar schemes, to gain expert insight into ways in which the sustainability of our procurement process can be achieved.
 - Prepare and implement a Social Value and Sustainable Procurement Strategy reflecting best practice within Wales. This will ensure procurement frameworks and contracts measure social value and sustainability during the tendering process, and will outline our approach to sourcing goods and services which are environmentally friendly, socially responsible and economically viable.
 - Explore options for local procurement to be delivered via national/regional collaboration both within the fire and rescue sector and across other blue light agencies.
 - Continue to work with Fire Aid to ensure that equipment is recycled where possible.
 - Develop a procurement awareness training package, embedding core principles of social value and sustainability at all levels of the Service.

6.0 ENERGY CONSUMPTION

6.1 Overview

- 6.1.1 As a Fire and Rescue Service we recognise the importance of reducing our energy consumption across our estate. We are continually improving our system for monitoring consumption and are installing energy saving initiatives where possible to reduce our carbon footprint.
- 6.1.2 The heating of our buildings is undertaken using a variety of hydrocarbon fuel sources, which are inherently unsustainable and which we will seek to eliminate.
- 6.1.3 We continually seek the most efficient and green energy tariffs and currently have a small number of sites which have solar photovoltaic (PV) panels installed, with the intention to increase this over the plan period and increase the amount of renewable energy generated across our estate wherever possible.

6.2 Targets

- 6.2.1 Over the period of this strategy we will:
- Work with Re:fit Cymru and/or similar schemes, to enable energy efficiency retrofits to our estate in a fiscally neutral manner where possible.
 - Engage with the Welsh Government Energy Service regularly to remain informed on development in policy, technology and potential funding opportunities.
 - Continuously monitor the energy consumption and comparative energy efficiency of our buildings to identify any areas of concern.
 - Prepare and implement a Heating Decarbonisation Plan, setting out the manner in which we propose to address our Scope 1 emissions arising from heating our estate within the period of this strategy.
 - Prepare and implement a Power Decarbonisation Plan, setting out the manner in which we propose to minimise the carbon emissions arising from our electricity consumption.
 - Engage proactively with our staff and other building users to educate and encourage efficient energy use and other environmentally-positive behaviours.
 - Consider wider efficiency in use of public resources by making our estate available for community purposes where possible

7.0 WATER CONSUMPTION

7.1 Overview

- 7.1.1 As an organisation that relies heavily on water for a number of our activities, it is essential to use it in a sustainable way. Not only water consumption at incidents but also water that is used throughout our estate.
- 7.1.2 Over the years, we have installed a number of water saving devices in our buildings but more can be done in terms of rainwater harvesting and grey water reuse.
- 7.1.3 It is important to raise awareness to all employees to understand the true cost and scale of our water usage by the service to ensure water is used sustainably.

7.2 Targets

- 7.2.1 Over the period of this strategy we will:
- Quantify corporate water consumption throughout our estate
 - Consider rainwater harvesting, grey water use and similar water conservation measures whenever refurbishment or rebuilding works are undertaken
 - Educate and encourage staff and other users of our premises on water conservation and efficiency
 - Engage with Welsh Water to make use of treated wastewater for firefighting purposes where possible

8.0 OPERATIONAL ACTIVITIES

8.1 Overview

- 8.1.1 The Service regularly assists the public in dealing with the outcomes that arise from climate change such as flooding and wildfires.
- 8.1.2 We are committed to ensuring that we operate our Service in an effective manner that give appropriate cognisance to the effect of our activities, whether that is due to our usage of natural resources, our use of firefighting media such as foam, or whether it is our efforts to minimise the impact of the waste products e.g. water run-off or smoke into the environment.
- 8.1.3 As a Service, we continually review our operational procedures and equipment and fully embed the principle of environmental impact assessment into all our activities in order to fully consider the wider environment.

8.2 Targets

- 8.2.1 Over the period of this strategy we will:
- Ensure that procurement processes for the acquisition of new operational equipment includes consideration of all environmental factors, including 'total end of life' disposal impacts / costs
 - Work closely with partners including Natural Resources Wales to ensure best practice and minimise our impact on the environment and local biodiversity
 - Engage with local authority environmental staff and local nature partnerships to explore adding biodiversity and environmental sensitivity layers on our Mobile Data Terminal (MDT) systems

9.0 WASTE AND RECYCLING

9.1 Overview

- 9.1.1 Waste is a considerable issue for an organisation which covers a large geographic area. Reducing the amount of refuse we produce in the first instance is one of the best chances we have to avoid sending waste to landfill. As a public body, we need to be accountable for the amount of waste we produce and reducing at source will be one of our main objectives going forward.
- 9.1.2 In 2010, Welsh Government produced a Waste Strategy for Wales to give targets for waste minimisation for different sectors. 'Towards Zero Waste' provides the details to inform organisations how to be a zero-waste nation by 2050. As outlined within this strategy, we aim to maximise recycling, minimise the amount of residual waste produced and send as little waste as possible to landfill.
- 9.1.3 As a Service, we work towards annual reduction targets in relation to our waste and regularly review our waste contracts to ensure we have the best fit possible to help us with the targets. Due to the geography of the Service area, this can provide a number of logistical challenges on a day to day basis.
- 9.1.4 As a Service which produces its fair share of waste, we must continue to take measures, as far as is reasonably practicable, to prevent waste and use recyclable / biodegradable products where available. By considering and applying the waste hierarchy, it gives priority to preventing the creation of waste in the first instance. It is also important to educate our staff to be aware that waste minimisation at source is much more sustainable than the recycling of waste materials. This can avoid or reduce the production of waste water in the first place.

9.2 Targets

- 9.2.1 Over the period of this strategy we will:
- Prepare and implement a Waste Reduction Strategy, which will encourage the re-use of materials, reduce the volume of waste to landfill, promote recycling and sustainable purchasing, and reduce the use of single-use plastics.

10.0 FLEET

10.1 Overview

10.1.1 Our fleet plays a crucial role in responding to emergencies and keeping our communities safe. However, it is also important that we consider the environmental impact of our fleet operations. We are committed to reducing the emissions and environmental footprint of our fleet, as well as to promoting sustainable transportation within our Service. We aim to lead by example and demonstrate that it is possible to balance safety and environmental responsibility in our operations.

10.1.2 There is a large transport fleet including 54 fire appliances, one incident command unit and 31 'special' vehicles - such as all-terrain vehicles and foam carriers; there are also three aerial ladder platforms, portable power tools, lifting and winching and other specialist equipment to enable us to respond to many different types of incidents.

10.1.3 Our fleet can be described within three distinct categories. The red fleet consists of operational and response vehicles. The white fleet is entirely Service-provided, and the grey fleet consists of employee-owned vehicles used on official business.

10.1.4 The principal fuel used within the fleet is diesel, however a small number of vehicles and portable appliances are fuelled by unleaded petrol. The Scope 1 carbon emissions arising from our fleet operations in FY 2021/22 were nearly 614 tonnes of CO₂ equivalent.

10.1.5 The typical lifecycle of an operational fire appliance is in excess of fifteen years, with a rolling programme of replacement.

10.2 Targets

10.2.1 Over the period of this strategy we will:

- Prepare and implement a Fleet Decarbonisation Plan, setting out how we propose to eliminate our Scope 1 emissions arising from transportation
- Continue to provide a salary sacrifice employee car leasing scheme where viable to do so, to incentivise switching to Electric Vehicles
- Continue to participate in approved Cycle to Work schemes where viable to do so
- Seek opportunities to expand EV charging capacity throughout our estate
- Promote car pooling and sustainable transportation to staff and partners
- Work in partnership with other public bodies when deploying any alternative fuels to promote best value, operational efficiency and supply resilience

11.0 BIODIVERSITY

11.1 Overview

- 11.1.1 It is widely recognised that biodiversity is under pressure from a range of influences and that habitats and species continue to decline, therefore, it is vital that we maintain and enhance our biodiversity to ensure it remains healthy, resilient and capable of adapting to change. The effect of climate change on biodiversity over the coming decades is likely to be significant, including a further loss of habitat and a potential increase in invasive species.
- 11.1.2 Much of our Service area is made up of rural land, with a significant area lying within the Snowdonia National Park. These areas are home to a great deal of wildlife, supporting a rich variety of flora and fauna which includes many species native to Britain and some unique to Wales.
- 11.1.3 We want to encourage and enhance biodiversity on our sites and surrounding areas where possible and protect the local environment in which we operate.
- 11.1.4 We aim to help protect and conserve the natural environment within our Service area by working closely with Natural Resources Wales, local environmental groups and specialists who can advise on the best approach when it comes to incidents involving these areas.
- 11.1.4 Section 6 of the Environment (Wales) Act 2016 ensures that all public bodies work towards conserving these important environments. In addition to legislation, the Welsh Government has produced a Nature Recovery Plan, which consists of the Strategy for Nature and the commitment to biodiversity in Wales, the issues needed to be addressed and the objectives for action; an Action Plan to meet the objectives to reverse the decline of biodiversity; and the governance structure, roles and responsibilities of everybody involved in the delivery of action for biodiversity in Wales.

11.2 Targets

- 11.2.1 Over the period of this strategy we will:
- Prepare a Biodiversity Report and Action Plan every three years, setting out work undertaken and plans for the coming period in relation to protection of ecosystems and enhancement of biodiversity.

Report to	Executive Panel	
Date	19 June 2023	
Lead Officer	Helen MacArthur, Assistant Chief Fire Officer (Finance and Resources)	
Subject	Consultation on Remedying Age Discrimination in Firefighters' Pension Scheme Wales	

PURPOSE OF REPORT

- 1 To provide an update to members on the proposals for remedy in the Firefighters' Pension Scheme in Wales to address the age discrimination.
- 2 To seek approval from Members to submit the proposed response to the Welsh Government's consultation on providing remedy to eligible members affected by the age discrimination.

EXECUTIVE SUMMARY

- 3 The Welsh Government is currently consulting on proposed amendments to the pension regulations required to address the age discrimination associated with the firefighter pension schemes in Wales. This will require the implementation of a retrospective remedy, placing all members back into their legacy schemes for the period 2015-22 and offering members a choice of legacy scheme or 2015 scheme benefits, in line with the Public Sector Pensions and Judicial Offices Act 2022.
- 4 The consultation document can be accessed [here](#) and provides the principles that will underpin the draft regulations due to be laid before the Senedd. It is anticipated that the regulations will be implemented from 1 October 2023.
- 5 The proposed response to the consultation is contained within Appendix 1.

OBSERVATION FROM THE LOCAL PENSION BOARD

- 6 The proposed response to the consultation has been considered by members of the Local Pension Board with all comments incorporated.

RECOMMENDATIONS

- 7 Members are asked to:
 - (i) note the background to the consultation; and
 - (ii) approve the consultation response due by the 23 June 2023.

BACKGROUND

- 8 The Public Service Pensions Act 2013 (the 2012) introduced comprehensive reforms of public sector pensions across the UK. The overall aim was to reduce the cost of pensions to the public purse through the introduction of higher pension ages with pensions calculated on a Career Average Revalued Earnings basis (CARE), rather than the traditional final salary scheme. Transitional protection was contained within the legislation which was subsequently proved to be discriminatory on the grounds of age.
- 9 Since that time, the UK Government has confirmed that eligible members will be transferred back to their legacy schemes for the period of remedy which is 1 April 2015 – 31 March 2022. The Public Service Pensions and Judicial Offices Act 2022 is the primary legislation to implement the remedy and to empower responsible authorities.
- 10 As the firefighters' pension scheme is devolved in Wales, the Welsh Ministers have responsibility for drafting the underpinning regulations necessary to effect remedy.
- 11 The Welsh Government is currently consulting on proposed amendments to the pension regulations required to address the age discrimination associated with the firefighter pension schemes in Wales. This will require the implementation of a retrospective remedy, placing all members back into their legacy schemes for the period 2015-22 and offering members a choice of legacy scheme or 2015 scheme benefits, in line with the Public Sector Pensions and Judicial Offices Act 2022.
- 12 The consultation document can be accessed [here](#) and provides the principles that will underpin the draft regulations due to be laid before the Senedd. It is anticipated that the regulations will be implemented from 1 October 2023.
- 13 The proposed response on behalf of the North Wales Fire and Rescue Authority in its capacity of Scheme Manager is contained within Appendix 1.

IMPLICATIONS

Wellbeing Objectives	The pension arrangements promote long term stability in the workforce and the remedy addresses age discrimination.
Budget	The requirement to address remedy will impact financially on the Authority's financial position as pensions for those affected will be enhanced. The impact will be addressed via the valuation and setting of future employer contributions.
Legal	The Authority has a legal duty to address the age discrimination and comply with the scheme regulations.
Staffing	The provision of remedy will support staff in their retirement planning and support wellbeing.
Equalities/ Human Rights/Welsh Language	The remedy addresses previous inequalities.
Risks and Uncertainties	The provision of remedy is a complex area which unknown financial consequences.

	Question	Response
	Scheme Membership	
1	How far do you agree with our proposal that, where an entitled member had multiple employment contracts during the remedy period with the same employer, all those contracts should be covered by the remedy, regardless of when they were entered into?	This would appear to be an equitable proposal - all members' "remediable service" being eligible to be put back into legacy schemes. It reflects that at the material date the employee was eligible for remedy and recognises the association between the contracts of employment (i.e. they all flow from the work of a firefighter)
2	How far do you agree with our proposal that all affected members who opted out of 2015 Scheme membership during the remedy period should be entitled to opt back in to their legacy schemes retrospectively, without having to show why they originally opted out?	The principle that a member who would have been eligible for remedy save for the opt out should be allowed to opt back in is reasonable. However, it is considered that restricting this to those members who opted out during the period of remedy (per para 38) requires further consideration as it appears too restrictive. An approach which allows Scheme Managers discretion to consider opt outs from an agreed date of knowledge may be more appropriate (e.g. 1 st April 2012 as set out in para 7(e)). This would, therefore, capture those eligible members who opted out of the scheme and made alternative provision earlier than the first day of remedy.
	Contributions	
3	How far do you agree with our proposal that scheme managers should be required to repay surpluses in contributions as a single lump sum only?	It is agreed that this is a reasonable approach and is manageable from the perspective of the Scheme Manager.
4	How far do you agree with our proposals that scheme members with a contribution's deficit should be allowed to choose whether to repay it as a lump sum or (if the deficit is at least £100) in instalments over a period of up to 10 years?	The approach is reasonable and can be administered by the Scheme Manager. However, unless the scheme member's contribution's deficit is substantial, they should be required to repay it sooner than 10 years. It would be helpful to understand what discretion individual Scheme Managers have to develop a scheme which deviates from the full 10 years. For example, would it be possible to develop a scheme whereby the monthly payment does not fall below that for a firefighter without any protection in 1992? That way, the recovery of relatively small amounts for those who benefited from taper protection are recovered in a timely fashion, thus reducing the administrative burden.

5	<p>How far do you agree with our proposals that scheme members who are entitled to a refund of remedy period contributions should be entitled to waive it, to avoid having to repay it on retirement?</p>	<p>The proposals set out in paragraph 59 appear reasonable and can be administered by the Scheme Manager (albeit requiring onerous communication with members). The principle of allowing those affected 12 months to confirm their indicative choice is again reasonable.</p>
<p>Choice Mechanisms</p>		
6	<p>How far do you agree with our proposals that immediate choice elections must be made in writing, and will be irrevocable?</p>	<p>The proposal is reasonable including the timescales within which those affected are required to make a decision. The provision that such choices are in writing and irrecoverable is supported.</p>
7	<p>How far do you agree with our proposals that deferred choice elections:</p> <ul style="list-style-type: none"> • must be made in writing; • must be made no later than the later of the date one year before benefits become payable, and the date the member gives notice of a claim for pension benefits; and • can be revoked and remade by the member before benefits come into payment? 	<p>The proposals appear fair although further consideration and clarity on the practical implications would be beneficial. It is not clear on the rationale for including a date of one year before taking benefits, as practically the date of notice of a claim for pension benefits is generally the date that a member submits their notice of retirement. At this stage it is anticipated that they will have received a pension forecast to enable the choice to be made in writing, but this is not always the case.</p> <p>The proposal to allow members to change their choice, presumably in writing, up to the point that the benefits come into payment needs further clarification. There will always be a period of elapsed time between the completion of the signed retirement documentation and the physical payment. Whilst it is accepted that the occasions where the decision is revoked may be limited, the administrative implications are significant and require processes to be overridden (e.g. intervening to cancel a BACS payment).</p> <p>It may be appropriate to consider the date that the pension comes into payment as the date on which the final documents are signed.</p>

8	How far do you agree with our proposals that deferred choice members who wish to retire shortly after 1 October 2023, and for whom the deadline for making a deferred choice has already passed on that date, should be able to retire on the basis that their remedy period service was in their legacy scheme; and that they should be able to make an immediate choice themselves following retirement?	This proposal is reasonable.
9	How far do you agree with our proposals that members who have multiple contracts with the same employer should make separate immediate or deferred choices in respect of each contract?	Within question 1 it was accepted that all multiple contracts would be in scope, irrespective of the date of commencement of those contracts. This effectively considers the contracts as a whole rather than as separate contracts at the date of commencement. Therefore, it would be reasonable to treat them similarly at the point of decision making. While each contract could be the subject of a separate choice by the member, it is reasonable to require the member to make those separate choices at the same time.
10	How far do you agree with our proposal that members or their survivors who do not make an immediate or deferred choice by the stipulated deadline should be deemed automatically to have chosen remedy period service in their legacy scheme?	This is a necessary and workable proposal and allows for the effective administration of the scheme. Presumably, this automatic choice of remedy period service in their legacy scheme will also be irrevocable, i.e., the member cannot choose differently after 12 months.
III Health Retirement		
11	How far do you agree with our proposal that entitled members who were granted IHR during the remedy period should be reassessed against the criteria of their legacy scheme or 2015 Scheme as the case may be, and offered an immediate choice between the entitlements that result; but that they cannot have an automatic right to be re-employed?	<p>It is fair and appropriate that those members who have been assessed and granted IHR during the remedy period are afforded the opportunity to consider their position under both the legacy and the 2015 regulations.</p> <p>The example in 98 (b) provides insight into the complexity of ill-health retirements within the regulations. In this example Firefighter J was fully protected and received a lower tier ill-health retirement. However, if assessed under the 2015 regulations and with the same presenting clinical circumstances could have either continued in employment as exemplified in para 102, or alternatively experienced either a voluntary resignation or dismissal on the grounds of medical capability as exemplified within para 104.</p>

		<p>Not affording an individual an automatic right to re-employment appears the right course of action given the associated complexities of the role including maintenance of fitness and competency. However, this example also highlights that further consideration may be necessary as outlined below to ensure that the individual does not remain disadvantaged by the original discrimination.</p> <p>Had Firefighter J been subject to the 2015 regulations at the material time they would have exhausted contractual sick pay within the two years of aggressive treatment, but still been protected under the Equality Act. Therefore, practically once ill-health was not granted the individual would be required to make a choice:</p> <ul style="list-style-type: none"> • Remain employed but on nil pay; or • Voluntarily resigned/dismissed and required to take up a non-firefighting role.
12	<p>How far do you agree with our proposal that scheme managers should not be required to re-examine cases where entitled members were not granted IHR and continued in employment?</p>	<p>This is a complex area and is considered that each case may turn on its own facts. The proposal would appear reasonable in the circumstance of Firefighter J being able to resume normal firefighting duties after two years and remain in that employment at the point of the remedy. However, the position is less clear had Firefighter J been able to remain in employment during the duration of the treatment but find themselves unable to sustain this in the longer term and seek retirement prior to normal pension age. For example, if Firefighter J resumed operational duties in 2022 but retired in 2024 the pension will be actuarially reduced and they may legitimately argue that they have been disadvantaged by the discrimination.</p>
13	<p>How far do you agree with our proposal that scheme managers should be required to:</p> <ul style="list-style-type: none"> • re-examine cases where affected members whose legacy scheme is the 1992 Scheme were not granted IHR but were dismissed on related grounds of poor fitness and/or attendance? and; • offer an immediate choice between a 1992 Scheme ill health pension and a deferred 2015 Scheme 	<p>The narrative in para 104 provides an example of an employee whose employment potentially ceases as a consequence of being of an ill-health retirement. Whilst the example outlines that this may be due to fitness it is considered that the example of Firefighter J in para 98 (b) perhaps provides a more likely example. In the event that Firefighter J was either dismissed or resigned following the outcome of the ill-health retirement assessment it would be appropriate to reconsider this.</p>

	<p>pension to any member who is found to have qualified for IHR under the former Scheme?</p>	<p>However, it is important to distinguish this case from those whereby a member was dismissed or resigned due to absence not considered appropriate for an ill-health retirement referral at that time. In these circumstances, it would appear reasonable to revisit the facts of the case to be assured that it did not meet the criteria for a referral to the IQMP under the legacy arrangements but an automatic right to an IQMP referral would not be considered advisable.</p>
<p>Survivors and survivor benefits</p>		
<p>14</p>	<p>How far do you agree with our proposal that, where an entitled scheme member dies without making an immediate or deferred choice:</p> <ul style="list-style-type: none"> • that choice should instead be made by an “eligible decision-maker” as defined in paragraph 111 above; and • that the 2015 Scheme criteria should be used in all cases to identify the eligible decision-maker 	<p>This is a difficult and sensitive area and the proposals set out in the relevant paragraphs are reasonable and workable. The proposals provide clarity for the Scheme Manager to address potentially difficult and conflicting situations.</p>
<p>15</p>	<p>How far do you agree with our proposals that:</p> <ul style="list-style-type: none"> • If there is no agreement on the identity of the eligible decision-maker, or if the eligible decision-maker fails to make a decision by the deadline, the scheme manager must deem that an election for remedy period service in the 2015 Scheme has been made; and • If a scheme member makes a valid immediate or deferred choice before s/he dies, that choice will be honoured and that no survivor would be entitled to revisit it. 	<ul style="list-style-type: none"> • It is noted that this proposal most likely places the beneficiaries in the best position and is, therefore, the preferred option. Will provision be made within the regulations for discretion to be applied where this choice is demonstrably detrimental to the beneficiaries? • The proposal not to revisit a valid choice by a scheme member would appear reasonable. Clarity on what would invalidate the choice would be helpful (for example, if the affected beneficiaries could demonstrate the member did not have sufficient mental capacity or information to make an informed choice at the time?)

16	<p>How far do you agree with our proposals that:</p> <ul style="list-style-type: none"> • Historic overpayments of survivor benefits to survivors who are eligible decision-makers should be recovered from them, but overpayments to other survivors should be written off; and • Only the eligible decision-maker would be eligible to receive a contributions surplus, or liable to repay a contributions deficit, arising from her or his choice. 	<p>The proposal to recover overpayments from eligible decision-makers is reasonable and the arrangements for other survivors appropriate. Similarly, the arrangements for contribution surplus or deficit are workable. Consideration of the payback period of historic overpayments should be made to avoid undue hardship.</p>
17	<p>How far do you agree with our proposals that:</p> <ul style="list-style-type: none"> • Death lump sums for members who died during the remedy period should be recalculated in line with the eligible decision-maker's choice, and any reduction in a lump sum paid to the eligible decisionmaker should be recovered from her or him; but • Surpluses in death lump sums that were paid to persons other than the eligible decision-maker, or to the deceased's estate, should be written off. • Where an affected member died during the remedy period leaving no-one entitled to a survivor's pension, but with a valid nominee for a 2015 Scheme death lump sum, the scheme manager should simply pay that sum without needing to offer the nominee a choice. 	<p>The administration of arrangements for deceased members is always sensitive and proposals set out are reasonable. It may be appropriate to consider the period over which reductions in lump sums should be recovered to avoid undue hardship.</p>
Added Pension		
18	<p>How far do you agree with our proposals that:</p> <ul style="list-style-type: none"> • Entitled members who purchased 2015 Scheme additional pension during the remedy period will be able to receive a refund of the cost of that, plus interest; but 	<p>This proposal is workable and supported.</p>

	<ul style="list-style-type: none"> Members who are to make an immediate choice will not receive that refund if they make an immediate choice in favour of the 2015 Scheme. 	
19	<p>How far do you agree with our proposals that:</p> <ul style="list-style-type: none"> Affected members would have a right retrospectively to purchase added pension benefits in their legacy schemes during the remedy period, on the same terms as applied to such purchase and with the cost of doing so adjusted for interest; and Any such choice must be made within one year of a member receiving her or his initial remediable service statement. 	<p>No comments are made on the specific proposal, although clarity on the arrangements for making good the contributions would be helpful (i.e. is the working assumption that the deficit will be made good over a period of up to 10 years correct).</p>
Divorce and dissolution		
20	<p>How far do you agree with our proposals for pension attachment orders, namely that:</p> <ul style="list-style-type: none"> Where a pension attachment order is already in force but the pension is not yet in payment, no action is to be taken; Where a pension attachment order is already in force and the pension is already in payment, the pension payable to the pension credit member may change as a result of the pension debit member's immediate choice, but that any historic overpayment of such pension arising from the choice is written off; For divorces and dissolutions taking place in the future but before the pension debit member has made a deferred choice, CETVs for remedy period service in the 2015 and legacy schemes 	<p>The proposals are reasonable and provide clarity. In terms of divorces/dissolutions in the future it is appropriate for the court to receive the CETV for both the legacy scheme and the 2015 scheme to enable it to make an informed decision.</p>

	should be calculated, and the court should use the higher of the two.	
21	<p>How far do you agree with our proposals for pension sharing orders already in place on 1 October 2023, namely that:</p> <ul style="list-style-type: none"> • Remediable service statements for entitled pension debit members include pension debits based on remedy period service in the legacy and 2015 Schemes (and immediate and deferred choices are made accordingly); • Scheme managers should recalculate CETVs at the point of divorce or dissolution based on the scheme of which the debit member was not a member at the time; and • If that CETV is higher than the one used by the court, then the pension credit member should receive a pension credit for the difference between them. 	The proposals are reasonable and provide clarity. In terms of divorces/dissolutions in the future it is appropriate for the court to receive the CETV for both the legacy scheme and the 2015 scheme to enable it to make an informed decision.
22	Do you favour such a pension credit being applied automatically to the pension credit member's benefits in whichever scheme had the higher CETV; or should such members be offered a choice about that?	The application of pension credits to the scheme with the higher CETV would appear be a practical solution.
23	<p>How far do you agree with our proposals for pension sharing orders that are made on or after 1 October 2023, namely that:</p> <ul style="list-style-type: none"> • For active and deferred members, the CETV provided to the court should be based on remedy period service in the legacy scheme. • Where such members then make a deferred choice for remedy period service in the 2015 Scheme, their pension debit is adjusted accordingly (but the 	These proposals appear fair and reasonable and it is agreed that for future divorces/dissolutions that the court receives a CETV for both the 2015 and legacy scheme benefits.

	<p>pension credit member's benefits do not change); and</p> <ul style="list-style-type: none"> For retired members who enter into a divorce or dissolution after making an immediate or deferred choice, the CETV provided to the court reflects that choice. 	
24	<p>How far do you agree with our proposals for pension offsetting arrangements, namely that:</p> <ul style="list-style-type: none"> Where offsetting arrangements are already in place when our regulations come into force, no action is taken; and For divorces and dissolutions taking place in the future but before the pension debit member has made a deferred choice, CETVs for remedy period service in the 2015 and legacy schemes should be calculated, and the court should use the higher of the two. 	<p>These proposals appear fair and reasonable and it is agreed that for future divorces/dissolutions that the court receives a CETV for both the 2015 and legacy scheme benefits.</p>
Transfers between schemes		
25	<p>How far do you agree with our proposals for club transfers during the remedy period, namely that:</p> <ul style="list-style-type: none"> The scheme manager for the sending scheme should calculate the alternative set of benefits for unprotected members based on legacy scheme service during the remedy period, and communicate that to the scheme manager for the receiving scheme, who should convert that into service in the relevant legacy scheme; The scheme manager for the sending scheme should calculate the alternative CARE scheme benefits for protected members and communicate that to the receiving scheme manager so that an 	<p>In broad terms the proposals appear reasonable although the rationale for not requiring payments between schemes other than for LGPS is not fully supported. Whilst it is recognised that such payments are bi-directional the value may be significant for senior staff, especially where there may have been a number of promotions during the remedy period and it is not known whether the transfers will balance out. Clarity would also be required on the responsibilities of the scheme manager for the sending scheme to provide details of backdated contributions due by the member. This will be especially important for members closest to retirement.</p>

	<p>alternative benefit amount can be created in the receiving scheme; but</p> <ul style="list-style-type: none"> • Other than for transfers to or from the LGPS, there is no need to amend the actual payment from the sending scheme to the receiving scheme. 	
26	<ul style="list-style-type: none"> • How far do you agree with our proposals for non-club / CETV transfers during the remedy period and up to 30 September 2023 namely that: <ul style="list-style-type: none"> • The scheme manager for the sending scheme should recalculate the CETV based on service during the remedy period in the scheme other than the one from which the member transferred. Any contributions deficit, net of tax, should be deducted from it, and any contributions surplus, net of tax, should be added to it. • If the result is higher than the CETV that was used at the time of transfer, the scheme manager should make a supplementary transfer payment for the difference, plus interest, to the scheme manager of the receiving scheme. • If the receiving scheme cannot accept such a payment, it should instead be made to the member directly, as compensation. 	The proposals set out appear reasonable and workable.
27	<p>How far do you agree with our proposals for transfers in the future, namely that:</p> <ul style="list-style-type: none"> • The scheme manager for the sending scheme should calculate two transfer values or CETVs, based on the member's remedy period service being in the 2015 Scheme and her or his legacy scheme. • For CETVs to schemes outside the public sector, if the member has not yet made good any 	These proposals appear reasonable and workable.

	<p>contributions deficit or received any contributions surplus, that should be subtracted from or added to the relevant value.</p> <ul style="list-style-type: none"> • The higher of the two values should then be used for the purposes of the transfer. 	
28	<p>How far do you agree with our proposals to allow affected members to revisit and reverse transfer decisions made during the remedy period, provided that both the sending and receiving scheme can permit a transfer to be retrospectively made or reversed?</p>	
Equalities impacts		
29	<p>We are interested in understanding whether the proposals in this consultation document will have an impact on people with protected characteristics. Protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex, and sexual orientation. Do you think that the proposals in this consultation will have any positive or negative impacts on people with protected characteristics? If so, which and why/why not?</p>	<p>The proposals set out in this document appear to consider those with protected characteristics.</p> <p>The ill-health retirement proposals address the differential benefits and assessment criteria between the two schemes and provide a workable framework. However, it is observed that those members who continued to work or were dismissed may consider that their detriment has not been fully assessed. It is acknowledged that this may not be possible to reasonably achieve within the framework of the regulations and that further compensatory payments may be required.</p> <p>The socio-economic duty is considered through the use of a repayment period extending up to 10 years for contributions due from members.</p> <p>The write off of monies due from beneficiaries other than the eligible decision maker appear to provide financial protection for those affected and are consistent with the principles of the socio-economic duty. However, the proposals for the recovery of money from eligible decision makers would benefit from further consideration to ensure that financial hardship is considered (e.g. what discretion will the</p>

		scheme manager have to write off such amounts or collect amounts due over an agreed period).
30	We would like to know your views on the effects that the above proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?	The provision of the regulations in both English and Welsh ensures that all those affected have appropriate language choices.
31	Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.	No further comments in this respect.
32	Do you have any other comments on our proposals which are not covered by the other questions in this consultation?	The proposals set out in the consultation document are very comprehensive and provide a workable framework for the provision of remedy.