

Independent Culture Review into North Wales Fire and Rescue Service

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We are crime and justice specialists - equal parts research, strategy and communication. From police forces to public inquiries, from tech companies to devolved authorities, we believe all these organisations (and more) have their own part to play in building a safer, more secure society. As the UK's only consultancy with this focus, we are as much of a blend as the crime and justice sector itself.

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We would also like to thank staff at North Wales Fire and Rescue Service for their support with arranging logistics for the review.

Context: Fire and Rescue Services in Wales

Governance

There are three fire and rescue services (FRSs) in Wales: South Wales Fire and Rescue Service (SWFRS), Mid and West Wales Fire and Rescue Service (MAWWFRS) and North Wales Fire and Rescue Service (NWFRS). Each FRS is governed by a Fire and Rescue Authority (FRA) consisting of councillors from the constituent local authorities. FRA members must set a budget to deliver the strategic aims of the Fire and Rescue National Framework, and scrutinise performance against desired outcomes. FRA members also appoint senior officers, including the Chief Fire Officer (CFO). However, in SWFRS, the functions of the FRA were transferred to four Commissioners appointed in February 2024 as a result of Welsh Government intervention following an independent culture review of SWFRS (see below for more information).

The FRAs are answerable to Welsh Government Ministers, who set priorities and guidance, and report on the compliance of the FRAs.

Welsh FRSs are inspected by the Chief Fire and Rescue Advisor and Inspector for Wales (Dan Stephens QFSM at the time of writing), an independent advisor who reports to the Welsh Government.

Legislative context

Legislation is in place to hold Welsh FRSs and FRAs to high standards and to ensure they hold due regard for equality and diversity. Relevant legislation includes:

- Under the Fire and Rescue Service Act 2004, the Wales Fire and Rescue National Framework must set out the priorities and objectives for FRAs. Under this Act, Welsh Ministers must report, at least every two years, on the extent to which FRAs have acted in accordance with the framework.¹
- The Local Government (Wales) Measure 2009 provides a regime for improvement, inspection and audit of FRAs. Under section 1 and 2 of the measure, a FRA must make arrangements to secure continuous improvement in the exercise of its functions. Among other things, they must function in terms of fairness.
- The Wellbeing of Future Generations Act 2015 imposes duties on public bodies (including FRSs) to improve the social, economic, environmental and cultural wellbeing of Wales.
- The **Equality Act 2010** imposes a duty on public bodies (including FRSs) to have due regard to the need to eliminate unlawful discrimination, harassment and victimisation within their services; advance equality of opportunity; and foster good relations between those who share a protected characteristic and those who do not.

¹ Unlike in England, there is no requirement to report before the Senedd — in England, the Secretary of State must report to the UK parliament.

- The Social Partnerships and Public Procurement (Wales) Act 2023 provides a
 framework to promote the well-being of the people of Wales by enhancing sustainable
 development (including by improving public services) through social partnership working,
 promoting fair work and socially responsible procurement.
- The Welsh Language (Wales) Measure 2011 sets out a legal framework which imposes a duty on public bodies (including FRSs) to comply with a set of standards relating to the promotion, growth, development, and equitable treatment of the Welsh language internally and externally.

Operational context

Part 2 of the Fire and Rescue Services Act 2004 specifies the core functions of FRAs, which are: promoting fire safety; firefighting; responding to road traffic accidents; and dealing with other prescribed emergencies (defined as events or situations that could cause death, serious injury, illness or serious harm to the environment).

However, since 2004, the operational context of FRSs has changed significantly. Since 2001-02, the number of fires in Wales has fallen by over 70%, with the lowest number on record seen in 2023-24, a 12% decrease compared to 2022-23.² Associated with this decline has been an increase in the diversification of the responsibilities of fire services. While fires have decreased considerably, the number of special service incidents (SSIs) has increased by 18% since 2001-02, with attendance at SSIs outnumbering attendances at fires in 2023-24 as well as two other previous years. SSIs include road traffic collisions, flooding incidents, medical incidents and so on.

This change to the operational context of working at a FRS bears implications for ensuring continued operational effectiveness, and workplace culture more broadly.

Background to the independent culture review

Independent culture reviews of other Fire and Rescue Services

The focus on culture in public services in Wales and the UK has increased over the past ten years, driven in part by high-profile reviews, such as the Casey Review into the Metropolitan Police³ and NHS England's culture review of ambulance trusts,⁴ which have highlighted widespread cultural issues in public services. These have spurred efforts to examine and reform organisational culture.

In the context of fire and rescue services (FRSs), troubling findings have been reported in multiple independent reviews of FRS culture. These have included:

² Welsh Government. (2024). Fire and rescue incident statistics: April 2023 to March 2024.

³ Casey, L. (2023). <u>An independent review into the standards and behaviour and internal culture of the Metropolitan Police Service</u>.

⁴ NHS England. (2024). <u>Culture review of ambulance trusts</u>.

- an independent review of conditions for **fire and rescue staff in England in 2015** which highlighted a toxic culture resistant to change;⁵
- the independent review of the **London Fire Brigade** in 2022 which found that the service was institutionally racist and homophobic; ⁶ and
- an independent review of **Dorset and Wiltshire FRS** in 2023 which concluded that the workplace culture was inadequate, with several examples found of discrimination, inappropriate language, and an overall lack of disciplinary action.⁷

In February 2023, Fenella Morris KC was appointed to lead an independent culture review of **South Wales Fire and Rescue Service** (SWFRS) after being commissioned by SWFRS's Chief Fire Officer (CFO). The review followed media reports around abusive behaviour from current and ex-colleagues of SWFRS. The review's final report was published in January 2024,8 in which it detailed 'serious deficiencies' in SWFRS, including:

- a lack of transparency in recruitment and promotion procedures, making it difficult to ascertain if they are fair and free from nepotism;
- the toleration of 'problematic behaviours' including sexual harassment, negative assumptions about women, domestic abuse and physical aggression outside of work;
- bullying including in relation to protected characteristics; and
- a lack of encouragement and support for people to speak up, and insufficient action in response.

Recommendations made in SWFRS's review included:

- setting clear behavioural standards, including examples of what is not tolerated;
- arranging an independent review of Executive Leadership Team (ELT) performance;
- involving an independent body in all Senior Management Team (SMT) and ELT appointments, disciplinary and grievance processes, and promotion and recruitment processes, for a minimum of 18 months following the review's publication;
- instructing specialist employment lawyers to review policies and procedures;
- pausing the use of temporary promotion for any period in excess of 6 months;
- reviewing the statutory functions of the Fire and Rescue Authorities (FRAs);
- ensuring complainants are regularly updated on the progress of their grievance/complaint;
- ensuring there is a full written grievance outcome and written findings or fact and reasons for sanction in each disciplinary case; and
- providing written feedback to all candidates for promotion and recruitment.

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⁵ Thomas, A. (2015). <u>Independent review of conditions of service for fire and rescue staff in England February 2015</u>. UK Government.

⁶ Afzal, N. (2022), Independent Culture Review of London Fire Brigade.

⁷ Johnson, A., et al. (2023). <u>Independent review into the workplace culture of Dorset & Wiltshire fire and rescue service: March-September 2023</u>.

⁸ Morris, F. (2024). <u>SWFRS culture review report</u>.

As a consequence of the review, the Welsh Government took direct control of SWFRS, with four commissioners appointed to oversee the service, and the CFO of SWFRS announced he would retire, and was put on administrative leave by the commissioners pending his retirement.

At the request of the commissioners put in place by the Welsh Government, an inspection by the Chief Fire and Rescue Advisor and Inspector was carried out to assess the operational effectiveness of SWFRS when responding to domestic dwelling fire incidents. Published in October 2024, the inspection highlighted concerns that operational tactics employed by SWFRS have placed firefighters at unnecessary risk and/or resulted in avoidable damage to properties. These were issues 'not limited to South Wales' that had been raised along with recommendations in previous inspections, but SWFRS had failed to respond to the warnings.

His Majesty's Inspectorate of Constabulary and Fire & Rescue Services reports

His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) 2023 report, *Values and Culture in Fire and Rescue Services*, ¹⁰ raised concerns about the culture in England's 44 FRSs (defined as '*ideas, customs and behaviours*'), citing evidence of bullying, harassment and discrimination. Thirty-five recommendations were made to assist FRSs to improve their values, culture, fairness and diversity, which were formally adopted by the Welsh Government and have started to be put in place by Mid and West Fire and Rescue Service (MAWWFRS) and North Wales Fire and Rescue Service (NWFRS). Recommendations included:

- 6 recommendations on raising concerns, including CFOs ensuring their services provide a confidential way for staff to raise concerns;
- 9 recommendations on misconduct handling, including CFOs providing assurances that they have implemented the standards on misconduct allegations and outcomes handling, which include conducting and completing investigations, providing training for staff who are carrying out investigations and ensuring the diversity/neutrality of the investigating panel/person;
- 5 recommendations on leadership, including CFOs implementing plans to monitor watch and team cultures and take prompt remedial action to address any issues identified; and
- 2 recommendations on improving diversity including offering increased direct-entry opportunities, developing plans to promote progression paths for existing staff in non-operational roles and putting plans in place to reduce any inequalities of opportunity.

Further reports published by HMICFRS in August 2024 found that while the culture in FRSs in England have shown some signs of improvement, progress is slow with significant issues remaining with unacceptable behaviour.^{11,12}

⁹ Stephens, D., and Osborne, M. (2024). <u>Inspection of the South Wales Fire and Rescue Service to consider the effectiveness of its response to domestic dwelling fires</u>. Welsh Government.

¹⁰ HMICFRS. (2023). Values and culture in fire and rescue services.

¹¹ HMICFRS. (2024). <u>Misconduct in fire and rescue services in England: Research commissioned by His Majesty's Inspectorate of Constabulary and Fire & Rescue Services</u>.

¹² HMICFRS. (2024). Standards of behaviour: The handling of misconduct in fire and rescue services.

Welsh Government and Welsh Parliament scrutiny

The Welsh Parliament's Equality and Social Justice Committee launched an inquiry into the governance of FRSs, prompted by SWFRS's review and ITV Wales investigations into the culture of SWFRS and NWFRS.¹³ The committee published its report, *Sound the Alarm: The Governance of Fire and Rescue Services*, in June 2024.¹⁴ The inquiry identified serious failings from FRA members, including their lack of accountability and capability to provide the level of strategic oversight, scrutiny and challenge that is necessary for their role. For example, the Fire and Rescue Services Association's (FRSA) submission to the inquiry highlighted FRA members' lack of experience in 'driving through cultural change in any organisation, let alone an emergency service'. The committee concluded that the Welsh Government should reform how Fire and Rescue Authorities work, including reducing their size and including members with better knowledge and expertise in equality, diversity and inclusion.¹⁵

The inquiry also highlighted repeated concerns about the appointment of an Assistant Chief Fire Officer (ACFO) at NWFRS as interim CFO of SWFRS in February 2024, following SWFRS's CFO being put on administrative leave, when there were ongoing employment tribunal proceedings of which the ACFO was a named respondent. The report stated that the 'lack of clarity and the defensive, bordering on dismissive, tone' in response to these concerns were 'troubling'.

Crest Advisory's appointment

In March 2024, MAWWFRS and NWFRS agreed with the Welsh Government with the need to better understand the progress of improvements to organisational culture in each service. The proposal formed the basis of a written statement by the then Deputy Minister for Social Partnership, Hannah Blythyn MS.¹⁶

In accordance with the public procurement route for Welsh FRSs, MAWWFRS and NWFRS procured the services of a specialist and independent provider to undertake a review of each organisation's culture. Crest Advisory was the successful applicant of this process.¹⁷

Crest Advisory is a consultancy and research organisation based in London. We work on projects related to justice, policing, and public safety. We've also supported several inquiries and reviews, such as the Casey Review into culture and standards at the Metropolitan Police, 18 undertaken

¹³ ITV Wales News. (2024). North Wales Fire staff describe 'toxic culture', 29 February 2024.

¹⁴ Welsh Parliament Equality and Social Justice Committee. <u>Sound the Alarm: The Governance of Fire and Rescue Services</u>. June 2024.

¹⁵ Welsh Parliament. (2024). Plenary - 09/10/2024. <u>6. Debate on the Equality and Social Justice Committee Report, 'Sound the Alarm: The Governance of Fire and Rescue Services'</u>.

¹⁶ Blythyn, H. (2024). <u>Written Statement: Culture and values in Mid and West Wales Fire and Rescue Service</u> and North Wales Fire and Rescue Service. Welsh Government.

¹⁷ Via the YPO framework for Managing Consultancy and Professional Services.

¹⁸ Casey, L. (2023). An independent review into the standards and behaviour and internal culture of the Metropolitan Police Service.

research into misconduct in fire and rescue services in England for HMICFRS,¹⁹ and provided communications support for the Grenfell Inquiry and the Independent Inquiry into Child Sexual Abuse.

Scope of the review

Crest was commissioned to undertake an assessment of MAWWFRS and NWFRS's current positions in relation to Fenella Morris KC's findings and other relevant studies regarding workplace culture; staff satisfaction and motivation; staff engagement; promotion arrangements; grievance arrangements; and workforce diversity.

The review set out to consider the outcomes of work already commissioned by both organisations in these areas, such as staff engagement surveys and focus groups, and the next steps proposed in response. It also aimed to identify and prioritise opportunities for improvement based on the findings obtained from full and open engagement with current and former staff and other interested parties such as trade unions. A critical part of the review was therefore to seek out and listen to the views and lived experiences of current and former MAWWFRS and NWFRS staff (see below for eligibility criteria).

See Appendix A for the full terms of reference.

This review was commissioned by MAWWFRS and NWFRS as a key element in their respective culture journeys.

We recognise that commissioning an independent review of the culture of an organisation is not an easy step to take. Throughout, both services showed their commitment to ensuring that the review was independent, that Crest could ensure the confidentiality and anonymity of participants, and that the review reached as inclusive a group as possible.

Crest kept MAWWFRS and NWFRS updated on the review's progress at regular meetings but no updates on engagement or findings were provided before the submission of the final draft.

NWFRS should be commended for their courage in commissioning this report.

¹⁹ HMICFRS. (2023). Standards of behaviour: The handling of misconduct in fire and rescue services.

Methodology

Engagement phases

The methodology for this review was made up of the following parts, which took place between July 2024-November 2024:

- **1.** A literature review
- 2. A document and data review
- 3. A survey
- **4.** Interviews (online and face to face)
- **5.** Focus groups (online and face to face)
- **6.** On-site visits to each fire and rescue service (FRS)
- 7. Written and audio submissions

The **literature review** was carried out to provide an up-to-date picture of culture within Welsh FRSs and to guide the development of research questions and engagement materials. Literature that was reviewed included reviews of UK fire and rescue services, reviews and reports on culture in other uniformed services, Senedd and UK Parliament evidence on FRS culture and governance, and other relevant grey literature.

The **document and data review** involved a desk review of existing FRS documents, policies and processes that provided insights into workplace culture at Mid and West Wales Fire and Rescue Service (MAWWFRS) and North Wales Fire and Rescue Service (NWFRS), and a review of current data at each FRS, including demographic data, sickness and absence, disciplinary and grievances, training and promotion.

The **online survey** included a mix of multiple choice and free text questions, and covered the following topics:

- Organisational culture and values
- Leadership and management
- Experiences of prejudicial and/or unacceptable behaviour and attitudes
- Reporting/speaking up about misconduct
- Training
- Promotion and recruitment
- Organisational development and change

Online and face to face interviews were offered to staff and former staff at on-site locations (e.g. community rooms of fire stations) and off-site locations. Multiple focus groups (online and face to face) were also carried out with staff, staff networks and trade union representatives. The interviews and focus groups were semi-structured — rather than having a set list of questions, the interviews and focus groups were guided by the participant and what they felt they wanted to share or was important for the review team to know.

Crest Advisory also undertook **on-site visits** to each FRS. These included visiting fire stations, headquarters and attending meetings and forums as observers. Crest observed a meeting of the Staff Culture Engagement Forum at NWFRS.

We also offered the opportunity for staff and former staff to contribute to the review through written or audio submissions, via a dedicated email address or by post.

All methods of contributing to the review and all communications about the review were offered in Welsh and English.

Rationale for the methodological approach

A mixed methods approach, combining quantitative analysis of survey data and qualitative engagement with current and previous FRS staff, allowed for a thorough and inclusive review of the progress both FRSs have made against the criteria set out by the Deputy Minister for Social Partnership.

Each research phase built on the last, ensuring a holistic view of organisational culture at each FRS. A mixed methods approach allowed perceptions of culture to be studied from different perspectives.²⁰ The survey provided a broad, generalisable picture of collective views and key differences, while interviews offered a space for more detailed and subjective personal reflection, and focus groups provided a platform for dynamic interactions, revealing collective and conflicting understandings.

Offering the opportunity to contribute via all the different methods listed above (with staff/former staff able to contribute via more than one method if preferred), helped ensure that the review was inclusive and that everyone who wanted to contribute could do so in a format most comfortable to them, taking into account factors such as neurodiversity, caring responsibilities and concerns about keeping their involvement confidential.

Box 1: How to read and interpret the findings of the review

The methodology for this review was carefully designed to gather as broad and comprehensive a spectrum of views as possible within the given timeframe, while maintaining confidentiality and anonymity for participants and ensuring that participation in the review through any method was entirely voluntary.

²⁰ Regnault, A., Willgoss, T., Barbic, S., & International Society for Quality of Life Research (ISOQOL) Mixed Methods Special Interest Group (SIG). (2018). <u>Towards the use of mixed methods inquiry as best practice in health outcomes research</u>. *Journal of patient-reported outcomes*, *2*(1), 19.

This review focuses on organisational culture — the ideas, customs, and behaviours that are pervasive and dominant. In this respect, it is not about assessing policies or procedures but instead is about understanding staff and former staff's experiences of what happens in practice or on the ground. Similarly, it is not an investigation into specific incidents or a determination of right or wrong in any given situation. That is, the review did not seek out alternative views or seek to corroborate evidence in response to what participants shared with us, as this would have exceeded the scope of the review.

However, all research methods have limitations. For example, while the survey achieved a strong response rate, providing high levels of confidence that the findings reflect the views of current staff, the views of every individual at MAWWFRS and NWFRS are not included. Furthermore, participation in the review was entirely voluntary, which means there is a risk of self-selection bias. We wish to emphasise that retained firefighters were under-represented among participants in this review, which may result in their perspectives being insufficiently captured.

Interviews, focus groups, and written submissions add valuable context and depth to the survey findings, but these insights may reflect context-specific nuances that are not universally applicable. As such, some opinions and perceptions expressed may be contentious or controversial and should not be interpreted as representing the full picture. Readers will notice frequent references to 'perceptions,' 'views,' and 'opinions,' reflecting the subjective nature of the findings from the interviews, focus groups and written submissions.

To preserve the anonymity and confidentiality of participants, it has not always been possible to provide full details of the experiences and situations that were described to us.

Participant recruitment

All current staff at MAWWFRS and NWFRS were eligible to take part. Former staff could also take part if they had been employed by either FRS either at or after 1 June 2021 (see <u>Appendix A</u> for the review's terms of reference).

Crest Advisory set up a dedicated web page which included key information about the review including live updates on when and how to take part, and a more detailed FAQ section which covered topics such as how Crest would ensure participant confidentiality. A dedicated email address was also set up for the submission of written/audio submissions and any general queries or concerns.

The review, including information on how staff and former staff could engage, was promoted on Crest and each FRS's social media channels via written posts and videos. Both FRSs also promoted key updates internally e.g. via weekly newsletters and Chief Fire Officer (CFO) briefs.

The review was also promoted via relevant national stakeholder groups (e.g. Women in the Fire Service and the Fire Officers' Association) and by trade union representatives and groups.

All communications were provided bilingually. All those who expressed an interest in taking part in the review were offered an opportunity to engage via an interview or focus group — that is, nobody was told they could not take part.

Engagement numbers

Engagement method	Engagement numbers
Survey	x311 completed responses x298 current staff x13 former staff
	Comparing the number of survey responses from current staff to the total number of current employees, the survey achieved a 95% confidence level with a margin of error of 3%. This means that, statistically, the survey responses are estimated to reflect the views of all current staff 95% of the time, with a possible variation of up to 3%.
Interviews	x25 in-person interviews x16 online interviews x32 current staff x9 former staff
Focus groups	x2 in-person focus groups (n=12 current staff) x1 online focus group (n=8 current staff) x4 online trade union sessions (n=8)
Written/audio submissions	x18 submissions Respondents did not have to state any personal information when submitting written submissions so a breakdown of current vs former staff cannot be provided.

<u>Analysis</u>

The interviews and focus groups were audio recorded (where participants consented) and transcribed. The transcripts, along with the written submission and transcripts of audio submissions, were analysed using inductive thematic analysis i.e. a data-driven approach that does not depend on any pre-existing assumptions of the themes, based on the procedure outlined by Braun and Clarke (2006).²¹

Each survey question (multiple choice and free text) was analysed, and were also broken down by relevant groups, where the number of responses allowed. For example, we looked at how responses differed by seniority, operational vs non-operational staff, gender, and disability. However, to protect confidentiality and further reduce the risk of identification of individuals, small numbers are not reported. Due to the high proportion of those who preferred not to provide demographic information (rates are outlined below) and small numbers of responses from certain demographic groups, we were often unable to report on demographic breakdowns of survey responses.

The findings from all methods of engagement were triangulated. Triangulation involves combining different types of evidence and data from multiple sources or methods to gain a more comprehensive and reliable understanding of a topic. For this review, this process involved:

- 1. Gathering evidence from different sources and methods: in this case, a document and literature reviews, survey, interviews, focus groups and written submissions.
- 2. Identifying patterns or inconsistencies: for example, a policy might suggest that a specific process is followed for recruitment, yet survey data might indicate low trust in or understanding of this process. Interview and focus group findings could either validate these insights or provide alternative explanations.
- **3. Integrating the insights to draw a nuanced and balanced conclusion**: this approach ensures reliability and validity by reducing the risk of relying on a single, potentially biased source, while leveraging the strengths of each evidence type.

The triangulated findings are presented <u>below</u> with relevant quotes and survey statistics. Where quotes are taken from survey free text responses, we have presented these verbatim (i.e. without any changes to spelling, grammar or punctuation), apart from when identifying information has been removed to protect confidentiality, and when contextual information is added in square brackets to aid understanding.

Psychology, 3, 77-101.

Braun, V., and Clarke, V. (2006). <u>Using thematic analysis in psychology</u>. *Qualitative Research in*

Executive summary

Key findings

- Overall, Crest's engagement with North Wales Fire and Rescue Service (NWFRS) staff and former staff suggests there is a consensus that the culture has improved since June 2021
- Despite progress, negative behaviours among a minority of middle and senior leaders hindered positive cultural change at NWFRS
- A perceived absence of accountability for past misconduct, an avoidant leadership style, and poor decision-making in senior leadership, have eroded trust throughout NWFRS which continues to affect organisational culture today
- There are clear tensions surrounding NWFRS's actions and initiatives to improve the diversity of the service
- Despite improvements, relationships between the Fire Brigades' Union (FBU) and relevant corporate staff at NWFRS remain strained

Drivers and characteristics of NWFRS's culture

- NWFRS staff and former staff were proud of their jobs, and enjoyed working in supportive and inclusive teams to achieve a common goal
- NWFRS was perceived to be entrenched with favouritism and bias, affecting almost all of the service's processes
- The leadership style at NWFRS was most commonly perceived as hierarchical, controlling and unapproachable, although efforts are being made to dismantle this

Recruitment, promotion and transfers

- A perceived overreach and lack of transparency around positive action at NWFRS in respect of whole-time firefighter recruitment has fuelled concerns of positive discrimination and service standards, and unwarranted doubts over female staff's operational competence
- There was a perception that favouritism still may take precedence over competence in operational promotion decisions
- Promotion and transfer decisions lacked transparency, fuelling perceptions of bias and feelings of uncertainty

Training and skills development

- NWFRS have made a conscious effort to improve delivery of operational training, with positive results, however non-operational training was seen as a tick-box exercise
- Insufficient training on person-centred management approaches, including handling difficult conversations, leaves managers unprepared, causing minor issues to escalate and overburdening HR and formal processes
- Professional development was experienced inconsistently, with individuals' line managers having a disproportionate impact on outcomes

Experiences of prejudicial and unacceptable behaviours, reporting and investigation

- Bullying and harassment are widespread in NWFRS, with over two-fifths (42%) of survey respondents reporting personal experiences since June 2021, and nearly half (49%) having witnessed such behaviours
- Over 1 in 6 survey respondents (17%) have reported experiencing discrimination in the last 3 years, while almost 1 in 4 (23%) have reported witnessing it, with gender-based discrimination being the most common type, highlighting entrenched issues of sexism at NWFRS
- Underreporting, insufficient or inconsistent responses to reports of unacceptable and prejudicial behaviour, and systemic avoidance, all contribute to a culture of impunity
- The lack of transparency and communication about investigation outcomes reinforces the belief that prejudicial or unacceptable behaviour goes unpunished, fuelling perceptions of a non-transparent culture at NWFRS

Health, safety and wellbeing

- Changes to auditing standards resulted in concerns among current and former operational staff members about health and safety at NWFRS
- Staff were of the view that there was an insufficient focus on, and capacity dedicated to, safeguarding at NWFRS
- While good pockets of mental health support were highlighted, inconsistent support for employees on long-term mental health leave remained an issue

Conclusion

- Our findings reveal that NWFRS is in a transition period in terms of the service's culture
- High levels of bullying and harassment, underreporting, inconsistent responses to complaints, and a lack of accountability reflect a bullying culture at NWFRS
- While senior leadership were seen as recognising the need for change, a lack of transparency in decision-making and communication was seen as hindering progress, fostering mistrust and scepticism
- Historical firefighting structures and hierarchical traditions, such as the 'command and control' culture, have not adapted to the service's expanded public safety role, and resistance within middle and senior management obstructs positive culture change
- Insufficient emphasis on people management skills and the reintroduction of hierarchical indicators like epaulettes risk widening divisions between management and junior staff, undermining prior progress
- Insufficient reflection on past failings leaves staff feeling unacknowledged, while achievements like increasing the proportion of women in the workforce are not adequately celebrated, reducing their motivational impact
- NWFRS must embrace greater transparency, confront challenges with courage, and celebrate successes to rebuild trust and sustain meaningful cultural transformation, ensuring continued momentum under its leadership

Findings

Context

Geography and demand

North Wales Fire and Rescue Service (NWFRS) covers a mainly rural area of 2,400 square miles, ranging from sparsely populated rural areas, through to more inhabited urban areas. NWFRS serves around 678,461 people (not including tourists and visitors), 329,382 dwellings and 33,606 non-domestic properties.

In 2023-24, NWFRS attended 1,657 fires, 2,901 false alarms, 251 road traffic collisions and 1,127 special service calls.

Workforce

In 2023-24, NWFRS employed 906 members of staff. 714 (79%) were male, and 192 (21%) were female. 96% of employees (868) were White.

NWFRS's workforce is split into four 'books': grey book (operational staff including control), green book (corporate staff and non-operational service delivery staff), blue book (which applies to heads of corporate departments) and gold book (the Chief Fire Officer [CFO], Deputy Chief Fire Officer [DCFO] and Assistant Chief Fire Officers [ACFO]). The majority (766, 85% of workforce) of staff are grey book (operational), and either work as whole-time (269, 30% of workforce), retained/on-call firefighters (466, 51% of workforce), or control staff (31, 3% of workforce).²² There are 140 green book (corporate and non-operational) staff (15% of workforce), who occupy departmental roles.

Gender diversity varies greatly between different areas of the organisation; 15% of grey book (operational) staff are female (113/766), compared to 56% of green book (corporate and non-operational) staff (79/140). Nearly three-quarters (33/45, 73%) of those in the top 5% pay category are male.

Structure and governance

NWFRS is accountable to its Fire and Rescue Authority (NWFRA), which comprises 28 councillors from the following councils: Anglesey, Conwy, Denbighshire, Flintshire, Gwynedd and Wrexham.

²² Whole-time firefighters are contracted to work in the fire service as their primary employment serving at whole-time fire stations. Retained firefighters usually respond from home or their primary employment on an on-call basis to their local fire station. Control staff are responsible for managing emergency situations by ensuring that the correct resources are sent to the right place as quickly as possible.

The Executive Board is made up of the CFO, DCFO, and three ACFOs.²³ Within the wider Service Leadership Team (SLT), 5 area managers with thematic remits and 7 heads of department report to the DCFO and ACFOs. Middle management/leadership consists of operational and corporate staff above supervisory level. Where findings refer to senior leadership, this refers to staff within the Executive Board (CFO, DCFO and ACFOs) and wider Service Leadership Team (Area Managers and Heads of Departments).

Cultural progress up until Crest's review

When NWFRS's current CFO was appointed in July 2021, she marked her **first 100 days** of their tenure by conducting meetings with every department, control watch and 44 stations.

NWFRS conducted a 'Fire Family Survey' in 2021 and again in 2023, carried out by an external organisation. The 2023 survey found some positive changes since 2021, including improved:

- Visibility and approachability of the Service Leadership Team (SLT);
- Ways for staff to report issues;
- Communication between SLT and other staff;
- Information sharing and joint working; and
- Staff perceptions of their manager and their sense of belonging.

However, a number of key issues were also identified, including:

- Inappropriate behaviour, including bullying, harassment and discrimination;
- Low levels of trust towards SLT and their efforts to be open and transparent and their modelling of NWFRS's values;²⁴
- Ineffective communication between different teams, positions and levels;
- Low levels of confidence amongst staff to speak openly;
- A lack of consistency and fairness between whole-time and retained staff, including a lack of engagement with retained staff; and
- Gaps in training, including people management training.

In response to the Fire Family Survey findings and other staff engagement, NWFRS has put in place a number of initiatives to improve service culture. Key areas of work include:

The **Staff Cultural Engagement Forum** and **Staff Survey Project Group** are the main fora for staff engagement on culture within NWFRS, set up in 2024. The purpose of the Engagement Forum is to identify issues affecting the workplace and to help shape future plans to improve the service. The purpose of the Staff Survey Project Group is to act on the Fire Family Survey findings, exploring areas of interest through engagement with staff, and forming an action plan to address issues and opportunities identified.

²³ Currently one of the ACFO vacancies is being held to be able to fund a fifth area manager who is not yet in a substantive role.

²⁴ NWFRS's core values are striving for excellence; service to the community; people; and diversity and inclusivity.

A **Siop Siarad** ('culture cafe') scheme set up by the Human Resources (HR) and Corporate Communications teams in 2022 as a response to the Fire Family survey to enable accessible and informal conversations between HR and all other staff on concerns, issues, feedback or queries, including on workplace culture. More regular Principal Officer visits to stations and departments aim to complement the Siop Siarad initiative, by better connecting and bridging the gap between junior and senior staff.

The introduction of **SafeCall**, an anonymous external reporting service introduced in 2023 in response to HMICFRS's recommendation that CFOs should make sure their services provide a confidential way for staff to raise concerns and that staff are aware of whistleblowing processes.²⁵

Various training packages have also been put in place with the aim of addressing behavioural issues and other cultural improvements. These have included rolling out **training on acceptable behaviours**, as well a suite of online **people management training resources** focusing on grievance and disciplinary procedures, conflict management, and responding to performance and behavioural issues. NWFRS has also rolled out **equality, diversity and inclusion (EDI) training** as well as hosting **'Leadership and EDI' events for managers**, aimed at promoting understanding of EDI and positive leadership standards. Linked to these training offers was the introduction of NWFRS's **Anti-Sexual Harassment policy** in April 2023.

NWFRS has appointed two **discipline and grievance officers** to improve the independence of investigations.

NWFRS has stated its commitment to encouraging and empowering more women to join the service, recognising the importance of reflecting the diversity of the community it serves. Since 2018-19, the organisation has implemented **targeted recruitment strategies under positive action**, in line with the Equality Act 2010, with a particular emphasis on attracting women into operational roles (see <u>below</u> for more information on how positive action is used in recruitment practices). These strategies have included **direct entry recruitment at strategic, middle, and supervisory management levels**, as well as **positive action days, social media campaigns, and tailored recruitment initiatives**. For instance, in 2024, NWFRS hosted '**experience days**' designed for individuals interested in operational careers, with a focus on engaging underrepresented and minority groups.

NWFRS also attends the recently established **All Wales Equality, Diversity & Inclusion Group**, the purpose of which is to provide a platform for Welsh FRSs to review and collaborate on matters of organisation culture and inclusion.

These efforts have proven effective. As of 2023-24, women represented 15% of the operational workforce, compared to 10% in 2020-2021.

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²⁵ HMICFRS. (2023). <u>Values and culture in fire and rescue services</u>.

Findings of Crest's engagement

Key findings

Overall, Crest's engagement with NWFRS staff and former staff suggests that there is a consensus that the culture has improved since June 2021

Three-fifths (60%) of survey respondents said that NWFRS's culture had improved, while 19% felt it had got worse (see Figure 1). This improvement was largely attributed to the appointment of a new CFO in the summer of 2021. Staff and former staff consistently compared the current culture under the current CFO to the previous culture, which was described as a 'dictatorship' built upon fear and micromanagement, and rife with bullying (particularly in the training department), cronyism, and misogyny.

"Historically the culture was obviously misogynistic — and the old boys club, and the bullying, and exclusion culture..."

"The culture has gone through an enormous shift since the old chief finished and the new chief came on board and there's been huge improvements."

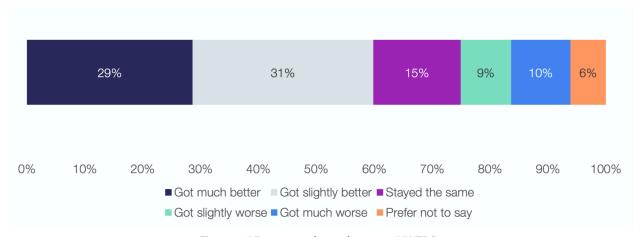


Figure 1. Views on culture change at NWFRS

In particular, staff highlighted the positive impact of the CFO's emphasis on open communication, transparency, and proactive engagement, exemplified by her first 100 days exercise. As a result of this, the approachability and visibility of senior leaders were thought to have improved, for example, through station visits and participation in events. This was echoed in the survey results, with 42% of survey respondents believing that there were greater opportunities to give feedback on NWFRS's values, culture, fairness, and diversity (see Figure 2).

"Senior leaders make a real effort and commitment to be more visible in the workplace, listening and talking to staff."

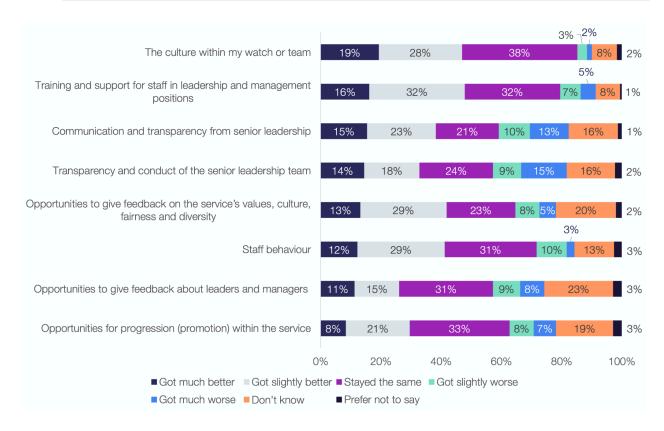


Figure 2. Views on communication-related elements of culture change at NWFRS

Staff turnover was also cited as a driver of positive cultural change, with individuals that were part of the 'old culture' slowly leaving and being replaced by more forward-thinking individuals who are committed to creating a positive work environment at NWFRS. However, evidence suggests that staff turnover cannot and should not be relied upon to change organisational culture, with HMICFRS's report on values and cultures in FRSs in England finding that the cultures of some watches were 'so strong that they survive beyond the retirement of staff members who behaved inappropriately'.²⁶

"The people whose management styles reflected the era, when they started to retire, you could see [the poor culture] starting to be challenged. People were saying, 'we do things a little differently', and the newer members of staff joining the service said 'we don't accept that'."

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²⁶ HMICFRS. (2023). <u>Values and culture in fire and rescue services</u>.

Despite progress, negative behaviours among a minority of middle and senior leaders hindered positive cultural change at NWFRS

Despite improvements in the culture at NWFRS over the past three years and the organisation's stated commitment to progress, there remains a significant gap between the current culture and the standards expected of a modern, progressive fire service. While cultural transformation takes time, participants reported that progress is being unnecessarily hindered by the negative behaviours of a minority. These individuals are often found within middle and senior leadership, where their influence exacerbates the challenge of driving meaningful and lasting change.

For example, when rating to what extent survey respondents agreed different groups of staff conducted themselves in a professional manner, rates of disagreement were highest for middle managers (30%), principal officers (23%) and senior leaders (22%). Survey respondents were also more likely to report witnessing senior leaders and principal officers engaging in prejudicial and inappropriate behaviour than other staff members — of those who reported witnessing abuse of power, 43% had witnessed it by a senior leader and 40% had witnessed it by a principal officer. Of those who witnessed intimidation, 42% had witnessed it by a senior leader and 42% had witnessed it by a principal officer. Of those who witnessed sexual harassment, 42% had witnessed it by a middle manager.

"We get the culture thing rammed down our throats but it is really difficult when there is a sandwich in the middle [middle management] that stops you from being able to make those changes."

"I would say there's a small pocket of middle managers that are a bit further behind on the cultural journey. A lot of them have been influenced quite heavily by what happened previously, where it was a lot more rigid, a lot more hierarchical."

A perceived absence of accountability for past misconduct, an avoidant leadership style, and poor decision-making in senior leadership, have eroded trust throughout NWFRS which continues to affect organisational culture today

Current and former staff at NWFRS consistently reported a lack of accountability from senior leaders on issues such as favouritism, bullying, and harassment — including sexual harassment. This included allegations from the past three years, as well as non-recent allegations, which, although outside the scope of this review, have had an ongoing impact on organisational culture, resulting in a feeling that issues are being 'brushed under the carpet'. This perceived failure to hold perpetrators accountable, rooted in an avoidant leadership style, has eroded trust in senior management, leaving many staff sceptical of leadership's commitment to improving the service's culture further.

This scepticism and erosion of trust was reflected in the significant number of staff and former staff who expressed either personal anxieties about taking part in the review, or described the reticence of colleagues who had decided not to take part, due to a lack of trust that the process was confidential, or that the results would lead to any change. This lack of confidence was reflected in the high number of survey respondents who chose not to provide demographic details or job roles — 14% preferred not to disclose their sexuality, 14% preferred not to disclose if they had a disability and 12% preferred not to disclose their gender. Among survey respondents, less than half (45%) strongly agreed or slightly agreed that senior leaders are genuinely invested in improving the culture of the service, and 43% agreed that the service will act on the findings of the culture review (see Figure 3).

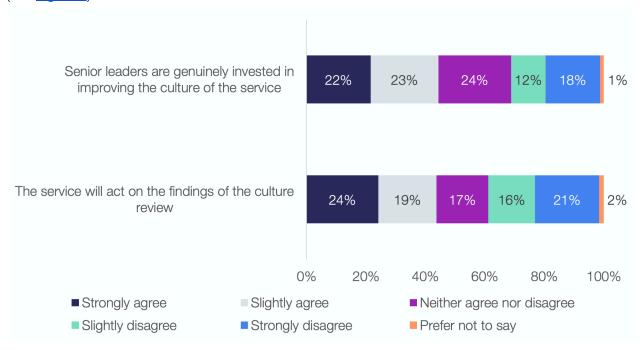


Figure 3. Rates of optimism for culture change at NWFRS

Protectionism was seen as a key driver of this avoidance and lack of accountability, with senior leaders seen as acting to protect NWFRS's reputation or outward appearances rather than individual or ethical responsibility. Reported examples included ignoring what some staff thought were legitimate health and safety concerns and allowing individuals alleged to be responsible for unacceptable or discriminatory behaviour to leave the service without their behaviour being investigated during their employment, thereby avoiding consequences. Senior leaders were seen to 'close ranks' and protect one another. Trust has been further damaged by recent actions involving an ACFO, including the CFO defending their appointment as interim CFO in South Wales, despite there being ongoing employment tribunal proceedings which included allegations of bullying and harassment at NWFRS (see Box 2).

Survey results highlighted that while 61% strongly agreed or agreed that managers encourage staff to call out unacceptable behaviours and encourage open communication (50%), there were lower levels of agreement that managers address and call out acceptable behaviour themselves (43%) or deal with poor performance effectively (22% — see Figure 4). Findings from interviews and focus groups highlighted that managers were often seen to avoid escalating behavioural or misconduct issues due to the fear of, or the inability to have, difficult conversations. This has fostered an environment where problems 'snowball', leading to an overreliance on HR and grievance and disciplinary procedures to deal with them (see here).

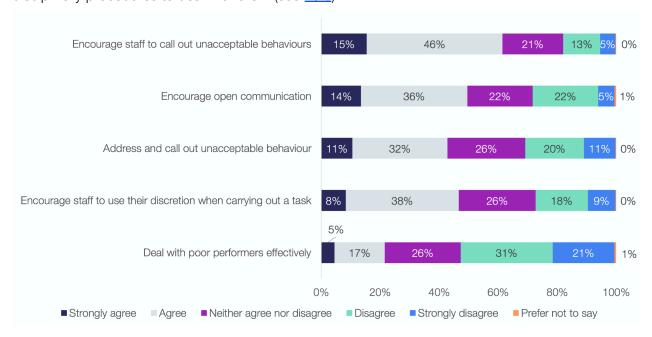


Figure 4. Views on managers' behaviours and performance at NWFRS

Of the members of senior and middle leadership who engaged with this culture review, a significant proportion expressed concerns that the review might disproportionately reflect the views of those with grievances or 'an axe to grind'. However, those who shared negative views or perceptions emphasised that their intention was not malicious but rather rooted in the ongoing impact of their experiences, often feeling as if they had received little to no acknowledgement or resolution (see here). This reinforces the points raised by participants regarding a perceived lack of accountability and reluctance to fully acknowledge cultural issues at NWFRS.

"I think it comes back to the fact that there's no accountability from up there. There's absolutely no accountability. I can't stress how they really [...] will never apologise."

A number of staff and former staff questioned the knowledge and capability of the North Wales Fire and Rescue Authority (NWFRA) to hold senior leadership accountable. Linked to this were a smaller number of concerns raised about the perception of a close affiliation between NWFRS's CFO and the Chair of NWFRA, compounding the lack of challenge by NWFRA. This echoes issues raised as

part of the inquiry conducted by Welsh Parliament into Fire and Rescue Authorities,²⁷ including concerns about the extent of meaningful engagement from Authority members, and their ability to act. Members of the NWFRA were invited to participate in this review but the response from members was limited.

Box 2: ACFO X

In April 2023, a formal complaint was made against an ACFO at NWFRS (ACFO X) on the basis of harassment and discrimination for trade union activities. An external investigation into ACFO X's behaviour commenced which concluded in October 2023. The investigation found evidence of a prima facie case that ACFO X's actions in April may have amounted to bullying and harassment and/or discrimination/harassment on the ground of trade union activity under NWFRS's discipline policy.

In November 2023, the above claims against ACFO X were submitted to an employment tribunal, and were heard in May 2024. The majority of claims were not considered as they were presented out of time and all of the claims against ACFO X were struck out. A separate claim against ACFO X is still to be heard.

Despite the ongoing employment tribunal proceedings, in February 2024, ACFO X was appointed as interim CFO for SWFRS, following the publication of SWFRS's independent culture review²⁸ and SWFRS's CFO being put on administrative leave.

The FBU in SWFRS passed a vote of no confidence in ACFO X's appointment 'to express dissatisfaction'.²⁹ NWFRS's CFO defended ACFO X's appointment, describing him as an 'able and competent officer'. NWFRS's CFO and the chair of NWFRA presented evidence to the inquiry into the governance of FRSs, and were deemed to have downplayed the allegations against ACFO X, with their statements perceived of being 'at odds' with the findings of the external investigation into ACFO X's behaviour.³⁰

It was concluded in the Welsh Parliament's Equality and Social Justice Committee's *Sound the Alarm* report that the controversy surrounding ACFO X's appointment as interim CFO for South Wales had 'potentially reinforced negative perceptions amongst FRS staff of senior management'.³¹

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²⁷ Welsh Parliament Equality and Social Justice Committee. <u>Sound the Alarm: The Governance of Fire and Rescue Services</u>. June 2024.

²⁸ Morris, F. (2024). <u>SWFRS culture review report</u>.

²⁹ ESJ Committee, Record of Proceedings, paragraph 237, 4 March 2024.

³⁰ Welsh Parliament Equality and Social Justice Committee. <u>Sound the Alarm: The Governance of Fire and Rescue Services</u>. June 2024.

³¹ Ibid

A significant proportion of interviewees and written submissions outlined personal experiences of being subjected to inappropriate behaviour by ACFO X, most commonly taking the form of bullying, abuse of power, and intimidation. These individuals as well as others without personal experiences of this nature appeared eager to discuss the inappropriateness of ACFO X's appointment as interim CFO in SWFRS, demonstrating how this decision had eroded the trust held by staff for SLT.

"We knew that ACFO [X] was under investigation for bullying and harassment [but was seconded to South Wales] and yet we are supposed to accept visits from these people [SLT] and sit there and look at them as if everything's okay. They make you feel like you're imagining the problem, when actually you're not [...] They couldn't be further away from 'culturally appropriate' if they tried."

There are clear tensions surrounding NWFRS's actions and initiatives to improve the diversity of the service

In 2023-24, 21% of NWFRS's total workforce was female, with 15% of the operational workforce being women. This is notably higher than MAWWFRS and SWFRS, where women made up just 9% and 8%³² of operational staff, respectively. The higher proportion of women in operational roles at NWFRS is partly attributed to the success of targeted recruitment efforts, including positive action initiatives (see <u>above</u>).

While there was an acknowledgement of the value of greater diversity, criticisms of NWFRS's approach to the recruitment of whole-time firefighters via positive action dominated our engagement findings, reflecting significant discomfort with how inclusivity is implemented at NWFRS. Many described the approach as a 'bingo machine' that crossed the line into positive discrimination and compromised service standards. Women in operational roles often faced external scepticism and internal doubts about their competence, based on assumptions that they were hired simply to 'tick a box'. These tensions have been exacerbated by a lack of transparency around NWFRS's positive action strategy and the absence of a clear policy to support it.

"Inclusivity seems to have taken over from who is actually correct and fitted for the job required. However, I am probably now labeled as misogynistic. But that is the way the world is now sadly."

"The service actively seeks to employ 50/50 gender split cohorts which devalues the women that join the service as their colleagues only see them as making up the statistic."

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³² Morris, F. (2024). <u>SWFRS culture review report</u>.

"The service claims to recognise merit and yet when we recruit new WDS [whole-time duty system] firefighters we are deliberately setting up a tie breaker situation between potential new recruits by not scoring their interviews. This is something that I believe may actually be illegal."

Despite improvements, relationships between the Fire Brigades' Union (FBU) and relevant corporate staff at NWFRS remain strained

NWFRS is a heavily unionised organisation. The majority of the workforce (66%) are members of the Fire Brigades' Union (FBU), while others are affiliated with unions such as the General and Municipal Workers' Union (GMB), the Fire Officers' Association (FOA), Unison, the Fire and Rescue Services Association (FRSA) and the Fire Leaders' Association (FLA). The FBU has a long-standing history of advocating for better working conditions, including pay, health and safety, and pensions. It plays a significant role in NWFRS operations, regularly consulting on service policies and holding meetings with SLT.

The Trade Union Protocol establishes a clear framework for industrial relations, and outlines NWFRS' intention to promote social dialogue, built upon mutual trust, between management and representatives. Additionally, the introduction of the Social Partnership Duty in 2023 has strengthened requirements for NWFRS to collaborate with trade unions, including consulting and engaging with them during decision-making. Both SLT members and union officials noted that the Duty has improved cooperation and facilitated more inclusive decision-making.

"We've got the Social Partnership Duty which places extra emphasis on us and I think it's a good thing. I think we have changed slightly since it has come into force, it has changed the way that [SLT member] conducts meetings [...] We say: 'This is what we would like to achieve. How can you help us achieve it? We'll consider your opinions and the voice of the staff'."

"I think that they are very, very positive at [...] engag[ing] with the trade unions across quite a detailed range of things. Since the social partnership and public procurement legislation has come in [...] North Wales Fire and Rescue Service are much more advanced than other organisations in terms of their attempts to engage at a strategic level."

However, the relationship between NWFRS and the FBU has been inconsistent. Recent tensions during the emergency cover review led to a 'turbulent' period where collaboration reportedly broke down. An entrenched 'us vs them' culture was described by some corporate staff as persisting between both parties, with mutual accusations of poor collaboration and fostering hostility. Concerns were also often expressed that certain FBU officials act in their own interests rather than those of their members, pursuing personal vendettas and resisting positive cultural changes.

"I think sometimes they [FBU representatives] look for every opportunity to cause a problem when there isn't one, and that is really frustrating."

"I find the union quite hard to work with [...] it's not always for the employees, it's for their own benefit."

"Personally, I feel that they're shouting about transparency and harassment and bullying, but a lot of my experience with them is that that is them [...] I feel they will wind people up and cause issues [...] as opposed to being the voice for the people that they are supposed to be representing."

Conversely, a minority of SLT members were described on occasion as harbouring an anti-union attitude, attributing this to union efforts to challenge poor management practices that SLT might prefer to go unaddressed.

"It's an ongoing battle with SLT, really. We have tried to harvest [develop] a positive working relationship with them. We're [the FBU] not very popular with them [SLT] on many occasions because obviously we have to challenge so much inaccuracy, so much bad behaviour."

"He [member of SLT] is well known for his anti-FBU stance. Very strong anti-FBU stance"

Achieving a more collaborative and constructive relationship will require a renewed focus on transparency, mutual respect, and valuing each party's contributions towards improving the organisation's culture for all employees.

"I don't think it is necessarily them [FBU officials] as people. I think that there's not enough collaborative working between us and the union."

Drivers and characteristics of NWFRS's culture

NWFRS staff and former staff were proud of their jobs, and enjoyed working in supportive and inclusive teams to achieve a common goal

Current and former staff expressed deep pride in their work, with 42% stating they always agreed with the statement, 'I am proud to say I work for the service', and 26% agreeing often. Only 2% said they never agreed. Staff were particularly proud of their role in supporting and making a difference in their communities.

"I feel pride putting my uniform on everyday."

Team camaraderie was frequently highlighted as a key cultural strength. A large majority (87%) identified 'supportive colleagues' as a major or partial strength, while 80% highlighted good collaboration and teamwork (see <u>Figure 5</u>). Additionally, 94% agreed that they felt supported by their team. Many examples of supportive environments and friendships were provided, where colleagues actively encouraged and uplifted one another, fostering a strong sense of unity and shared purpose.

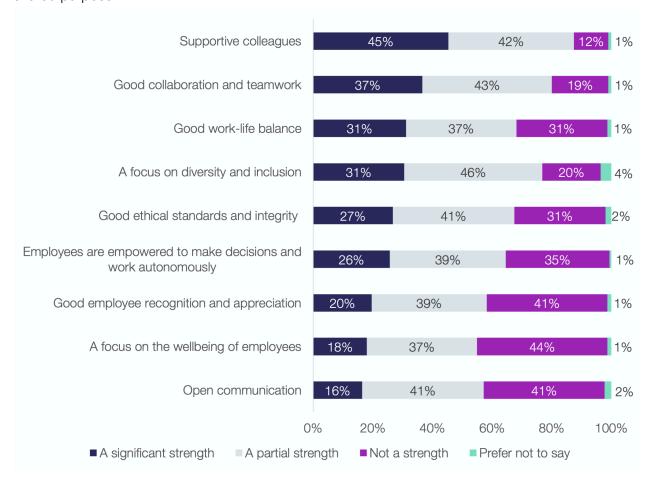


Figure 5. Views on the strengths of NWFRS's culture

"Being a member of the service makes you feel as if you are part of a family."

"It is a very collegial place to work."

"Teamwork on a peer level and [the] supportiveness with those colleagues [is a strength]."

This pride and passion translated into a clear commitment to, and hope for, NWFRS's continued evolution and improvement. Everyone who contributed to the review did so out of a deep dedication to the service, driven by a desire for their experiences and perspectives to help shape a stronger, more positive organisational culture.

"Parents want their kids to have better than what they ever had. And I'm close to retirement now, and I'd like to think I can help all this. Because I still love the job. I am committed to the job. Everyone has their calling in life, and the fire service was the calling for me. But I'd like to do my little bit to help improve it for people in the future, to have the opportunities going forward."

However, while 61% of survey respondents said they were likely or very likely to recommend working at the service, nearly a quarter (24%) indicated they were unlikely or very unlikely to do so (see <u>Figure 6</u>). Those working in corporate departments were most likely to recommend working at the service (77%), followed by other service delivery roles (69%) and whole-time officers at station manager and above (66%). Whole-time firefighters were least likely to recommend working at the service, with 35% being unlikely to recommend it.

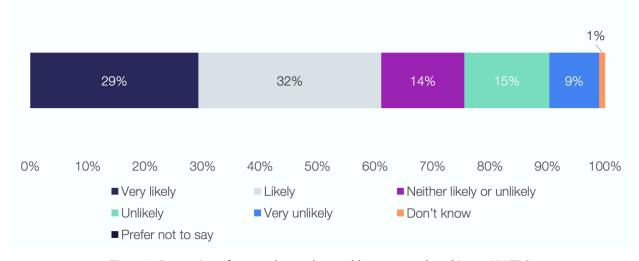


Figure 6. Proportion of respondents who would recommend working at NWFRS

NWFRS was perceived to be entrenched with favouritism and bias, affecting almost all of the service's processes

When asked about the perceived weaknesses of NWFRS, 71% of staff and former staff identified favouritism and bias as either a significant or partial weakness (see <u>Figure 7</u>). Whole-time firefighters were the most likely to view favouritism and bias as a significant weakness (58%), and men across all roles were more likely than women to rate it as significant (41% vs 32%).

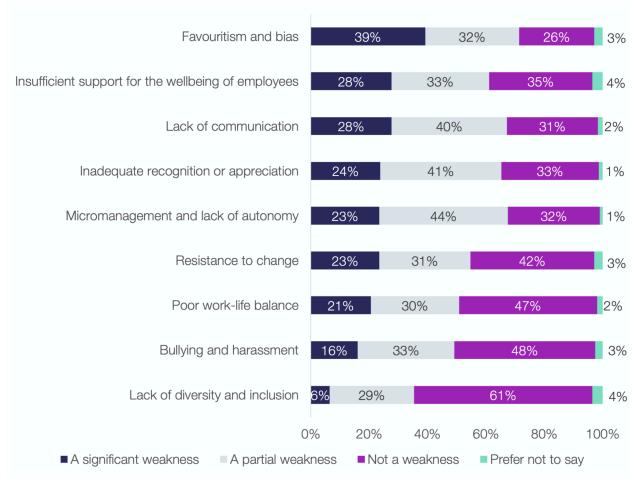


Figure 7. Views on the weaknesses of NWFRS culture

Favouritism and bias were perceived to be deeply entrenched in nearly all of NWFRS's processes. For example, the service's approach to positive action in recruiting operational staff led many to believe it discriminates against straight, white males (see here). This perception may explain why men were more likely to view bias and favouritism as a significant weakness (42%) compared to women (32%), as did whole-time firefighters (58%) compared to those in other roles.

Promotions, particularly for operational roles, were similarly widely seen as influenced by favouritism, with success often perceived to hinge on being well-liked within NWFRS (see here). Additionally, members of senior and middle leadership were frequently viewed as being more likely to evade consequences for inappropriate or prejudicial behaviour (see here), further reinforcing the perception of bias and lack of accountability at higher levels.

The leadership style at NWFRS was most commonly perceived as hierarchical, controlling and unapproachable, although efforts are being made to dismantle this

When asked to describe the leadership style at NWFRS, 41% of respondents characterised it as hierarchical and top-down, 27% as controlling, and 24% as unapproachable (see <u>Figure 8</u>). In contrast, only 11% described the leadership style as open and transparent.

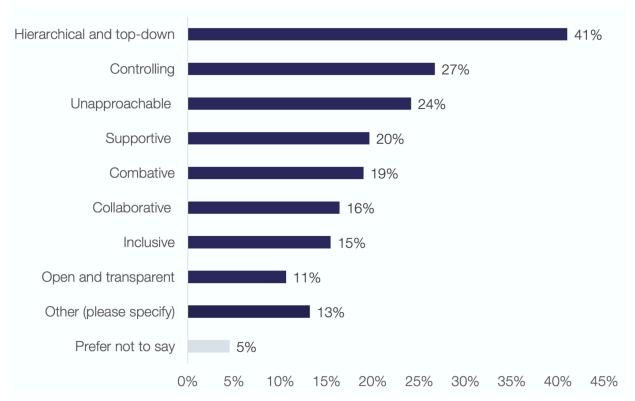


Figure 8. Descriptions of the leadership style at NWFRS

FRSs are institutions deeply rooted in a hierarchical structure built on command and control. This structure reflects its historical focus on firefighting — situations where strong leadership and decisive action are essential. However, the role of FRSs has expanded significantly over time, with a much greater emphasis on prevention.

Concerns were raised about the ability of senior leaders with an operational background to transition from a command and control management style — common in operational fireground settings — to a more collaborative approach outside of the response environment. This was said to contribute to instances of micromanagement, intimidation, abuse of authority, and, in some cases, bullying and harassment. Such patterns are particularly troubling given that many individuals with operational backgrounds ascend to leadership roles, with a majority of positions at group manager level or higher currently held by those with operational experience.

"On one hand, you want your operational managers, when they're out dealing with operational incidents, to be very command and control focused, because it's time critical. On the other hand, you want them to be back in the workplace and have a more collective and democratic, conversational type of leadership approach where you are asking for people's ideas. And some people find it really difficult to break from that command and control."

The hierarchy at NWFRS has created a visible divide between management and more junior staff, often described as an 'us vs them' mentality. The reintroduction of 'role indicators' in the form of epaulettes was raised by a significant number of operational and corporate staff who engaged with this review expressing concern that this move has the potential to reinforce divisions rather than promote unity and collaboration. It is noted that within NWFRS's Fire Family Survey, 65% of respondents stated they would like to see the reintroduction of role markings or rank indicators, however support was higher among operational staff, with less than half of non-operational staff supporting the move. The disparity in opinions between different roles underscores the need to carefully consider all perspectives before implementing this change.

"I'm a bit worried about rank markings coming back. Seems like a step back, it builds barriers."

Nevertheless, the service has placed a stronger emphasis on improving communication, openness, and approachability from senior leaders over the past three years. Evidence suggests some progress: 38% of survey respondents reported that communication and transparency from senior leadership had improved, compared to 23% who believed it had worsened (see <u>Figure 2</u>).

Initiatives to foster better communication have included the *Siop Siarad* initiative, station visits, the CFO's commitment to holding face-to-face meetings with staff (especially during the first 100 days of her tenure), and the establishment of staff forums. However, there were also criticisms, with a number of those who engaged highlighting inconsistencies in these communication efforts, describing a perceived reluctance among some members of SLT to engage openly and transparently with staff, creating barriers to achieving the goal of improved dialogue and mutual trust.

Recruitment, promotions and transfers

A perceived overreach and lack of transparency around positive action at NWFRS in respect of whole-time firefighter recruitment has fuelled concerns of positive discrimination and service standards, and unwarranted doubts over female staff's operational competence

Having a fire service that reflects the diversity of the community is crucial for fostering trust, improving communication, and enhancing overall effectiveness. It introduces a variety of perspectives, which aids problem-solving and promotes inclusivity. The expanding role and responsibilities of FRSs means a diverse workforce is more important than ever, as employees increasingly interact with individuals facing a wide range of personal challenges in the community, such as victims of domestic abuse.

NWFRS's process for operational recruitment incorporates positive action to help increase the inclusion of under-represented, and operates as follows:

- 1. Candidates are scored in their interview using a set criteria for consistency which confirms whether a candidate has achieved the required standard for each question or not. As a result, candidates are only given a 'pass' or 'fail' mark for each question
- 2. Individuals that pass the interview are randomly selected based upon a statistical process whereby the gender split will be 50/50, or as close to this as possible.
- **3.** Those individuals are then offered the role.

Through our engagement, we consistently heard concerns that NWFRS's approach to positive action has gone 'too far'. Over two-fifths (43%) of survey respondents felt the service was placing excessive emphasis on recruiting people from diverse backgrounds. This concern rose to 47% among whole-time firefighters, where recruitment efforts are most targeted.

"I agree with the direction taken, positive action days etc. But there appears to be an environment that, if you are a white male, you will not get in."

"Whilst there is a need for diversity we do need to look at the overall diverse picture of rural Wales and accept that in some remote/rural areas we are very unlikely to attract the required level of different cultures or ethnicities."

The majority who expressed concern felt that the recruitment approach had shifted from positive action to positive discrimination. While positive action is legal under a strict set of parameters in line with the Equality Act 2010, positive discrimination is not. Under positive action, underrepresented individuals can be offered a job over another candidate if they are equally qualified. While NWFRS has sought legal advice to ensure their approach is in accordance with equality legislation, many staff we spoke to believed the pass/fail system fails to demonstrate whether those offered roles are

as suitable — or more suitable — than those not selected. There was also a concern that less qualified individuals are being chosen, as interview performance is not fully reflected in the process.

"My belief [is that] we have crossed the line from positive action to positive discrimination [...] We as a Service currently receive between 17% and 22% applications for whole-time Firefighter roles from female applicants and yet [have] regularly recruit[ed] over the last 3 years a gender balanced recruit course. This has been achieved by eliminating scoring from the process and marking everyone as a pass or fail. Names then go into a 'random number generator' (separate pots for female and male) and places on recruits' courses are assigned that way. This has been explained to me as use of the 'tie-breaker' to increase representation from under-represented parts of the community. A goal I agree with, however, how can this method possibly be seen as a fair use of the tiebreaker when the system is engineered to mark everyone the same?"

"You can positively discriminate because there's a shortage of females, but there are strict ways to do that, and lowering the standards isn't one of them, but they did, they changed the rules [...] so they said 'right, we're not going to score interviews anymore, we're going to have pass or fail'. What you can do, if people are equally qualified, you can give the females the job. But my point is, they weren't equally qualified [...] with public money, it shouldn't come down to a lottery as to whether you get a job."

"I'm concerned that [positive action] was done immorally, which leads me to think that there was positive discrimination going on."

Many believed that NWFRS is consequently discriminating against white, heterosexual males, as they are proportionally less likely to be recruited when compared to those from underrepresented groups. In 2022-2023, 15% of applicants for whole-time roles were female, yet women made up 50% of successful candidates.

"My issue with the way we do positive action is that we are positively discriminating [against] straight white males."

"It almost feels like males are discriminated against."

Numerous members of staff argued that focusing on demographics hindered those who were 'best for the job' being recruited, resulting in a decrease in the standard and quality of care the public receives from NWFRS.

"The service has put that much effort into recruiting from diverse backgrounds that the quality on the incident ground has suffered."

"Statistically, we are providing a worse workforce by doing this. Because, if you were to give jobs to the top 10 candidates then they would be the top 10. If there is 100 candidates and you use a random name generator, then you're not getting the top 10%. So statistically speaking, we are providing a worse service for the public of North Wales. I disagree with it fundamentally based on that."

"I don't care who you are, who you sleep with, or what you look like. You just want someone who is going to save your life if it's needed. And I think the public would be horrified to know that, well, they just went on a pass or fail."

NWFRS's approach to positive action has led some to doubt the competence of female operational staff, expressing the view that women are being recruited solely because of their gender, rather than their skills. This was felt by female staff in particular to have unintentionally validated sexist views within the service, as positive action provided a justification for believing women should not be firefighters. As a result, some women feel they must constantly 'prove' their professionalism and competence to gain the respect of colleagues. It has also led to a lack of recognition for women's authority and the legitimacy of their decisions in their roles, in operational and non-operational contexts.

"When I first started, I was told I had to prove myself [...] and I've also been told when I was going through the stages [of recruitment] that they're encouraging women, so you'll get the job. So you always feel like you haven't really got it on merit."

"Personally, I think it's bad for culture, because the people that are here quietly, thinking women shouldn't be firefighters, feeling kind of justified in what they're saying. They're like, well, you're only here because you're meeting the quota. You're not here because you deserve it, because you were better than the male candidates."

"I'm made to feel like my position isn't something to be proud of, like I didn't earn my position. And I sit in a position where I have, technically, an influence and a power to make decisions and make change, but it's never recognised as important or significant."

This issue might be partly due to the lack of transparency in the positive action approach, with no set policy on how positive action operates within recruitment or communication on its importance and its purpose. Those who are not promoted often receive no feedback or scores, which fuels a belief that their lack of promotion was due to their gender.

"I think the people who they discriminate against are people who don't tick any of these boxes, like me, they're average height, build, white, male, heterosexual [...] so I said 'I want feedback because I'd like to know where I went wrong and how I can improve going forward'. I emailed HR requesting feedback [...] that was over 10 months ago."

"I have raised a concern with regard to my belief that we have crossed the line from positive action to positive discrimination. I have raised this concern 3 times with a line manager, HR and an Area Manager. The responses were all to brush it off and I have never received an answer that convinced me that we were, as an organisation, on the right side of the line with this, I don't know if I'm right or wrong but it would be good if someone could explain it to me."

"It would help the service if they were more transparent with the scores. So like, if you did get it on merit, for scores to be shown — but they don't, they just say 'a pass is a pass'. But because people don't believe [you got it on merit], they think you've got it out of favour because you tick boxes."

There was a perception that favouritism still may take precedence over competence in operational promotion decisions

Since 2021, efforts have been made to remove favouritism and bias from the promotion process including the revision of the recruitment/promotional policy and procedure. Previously, the CFO had sat on every promotion panel and the process was not perceived as fair and objective. This approach was reported to have stopped many individuals from applying for promotions. We also heard of an overreliance on temporary promotions under the previous CFO with the perception that this was to 'test' individuals out. Now, substantive (permanent) promotions for operational staff (both whole-time and control) follow a clearly defined process that ensures candidates meet the set criteria for the role. This process is outlined in policy and was updated in April 2024.³³

Other efforts to remove any bias from the selection process have included training for the Recruitment and Selection Panel on avoiding bias, covering equality, diversity, and inclusivity (although the depth of this training has been questioned; see here). A Quality Assurance Lead is also assigned to each panel to ensure the process is followed correctly.

Despite these improvements, widespread concerns remain about the fairness of promotions. Over a third (36%) of all survey respondents agreed promotions were decided fairly, while over two-fifths (41%) disagreed (see Figure 9). Agreement that promotions were decided fairly was much higher among survey respondents who had been eligible for, applied for, or received a promotion since June 2021, with over half (58%) of these individuals of the view that they were treated fairly or very fairly, while 21% felt they were treated unfairly. This suggests that some myths may surround the

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³³ Substantive promotion to whole-time duty system management roles - operational and control staff.

perceptions people hold of promotion processes, given those with first hand experiences are more likely to hold positive views.

"We have tried to make it more objective [...] you've got set questions, model answers, marking, scoring [...] The old Chief, used to go off-piste during interviews, they'd agree [with] the questions then he'd go off and talk and challenge and whatever."

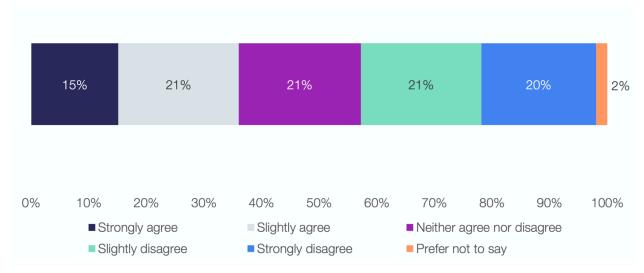


Figure 9. Ratings of the fairness of promotions in NWFRS

Most staff who discussed promotion procedures were of the view that a tendency to promote those who 'conform' still exists at NWFRS, though to a lesser extent compared to under the previous CFO's tenure. Many individuals described instances where they believed they or their colleagues had been overlooked for promotions they were qualified for, due to speaking out about perceived wrongdoings or challenging the status quo.

"She's asked for feedback and she wasn't given it. And I know that's because it was her. I've been told the person was great for the role, but it was because of who it was."

"If you stand up for things, if you don't go along with the company line, even if you disagree with the company line, you tend to get ostracised and pushed to one side [...] you're denied opportunities because you're put on some sort of list."

There was a perception that this lack of fairness was facilitated by SLT still having too much influence and power over promotion processes and decisions. Examples given included scores being altered to favour certain individuals, and candidates being given interview answers in advance by SLT.

"Somebody took the time to phone me up and say, by the way your application isn't good enough to get through the process, however you need to do this, this, and this and it will get through. And I was like, that's shocking, but thanks. And that's not fair."

"I am aware on more than one occasion of scores being changed by the senior leadership team to get the right people promoted. On one occasion — this is my understanding of the situation — the exam questions were given to one individual because they wanted him to pass."

"I have sat on promotional processes for everything from brand new recruits, to crew, to watch, to station. I've been involved in some of the exam questions that we set and marked on, sat on some of the boards to do exam questions and stuff. So I've had a lot of exposure to people development... And I've definitely come across examples where people have been given exam questions before [the] exam."

"It's the hierarchical nature of the fire service. The closer to the top you are, you have more control over things and you have the power to implement and deny things."

Promotion and transfer decisions lacked transparency, fuelling perceptions of bias and feelings of uncertainty

The belief that bias and favouritism exist in promotion processes was intensified by a perceived lack of transparency in decision-making. In the absence of clear communication, individuals were left to form their own conclusions. We were told by many of those who engaged that decisions were often justified by citing 'the service's needs', without an explanation of what these needs were. The majority who cited this perceived this rationale as a catch-all excuse that enabled bias and favouritism to persist while avoiding the need to provide genuine feedback.

According to the policy for substantive promotion to whole-time duty system management roles, which was approved in April 2024, all individuals should receive feedback following their interviews, which is based on scoring documentation from the interview. While this was a recent policy, meaning it may be too early to assess the effectiveness of the new approach, it was notable that many of those we engaged with reported that feedback following interviews is almost non-existent. This suggests there is work to be done to ensure this expectation is effectively communicated to all employees. There is also a need for the feedback approach outlined in the April 2024 policy to be reflected consistently across all other relevant policies. One existing policy (NWFRS's recruitment and selection policy), for example, still states that internal applicants will only receive feedback upon request.

"I think there's a bit of a lack of transparency with promotional processes [...] I think they need policies in place for things like that."

"I witness a lot of bias and corruption when it comes to things like promotion. There was never any consistency with the rules applied. And in the fire service, they have this term, [...] sort of caveat, which says, we can do this at the exchanges [exigencies] of the service [based upon service needs], which basically means they can do whatever they want. And it's very difficult to challenge when a decision is made which is biased, or it's inconsistent with decisions that were previously made, because they always throw that back at you and say, 'well, that's what we needed at the time'. But, you know, in 2024 that is not a satisfactory answer. You know, we've moved on from those times when people can bully their way through and do what they want because it's what they want. People have to be treated fairly and given equal opportunities, and given the same opportunities as their colleagues and their peers [...] Just it takes that fairness and that equality away. And I've seen it so many times, literally hundreds of times. And that's, again, something which continues to happen."

"Because it's almost like they know the people they want, and it all boils down to communication. I believe, in the end, it's just communicating with people, being fair with people [...] When they've done something and they haven't quite hit the mark, give them honest, constructive feedback."

It is stated in employees' terms and conditions that there is a requirement to serve at any of the service's premises applicable to their role and/or post. While accepting this requirement, a lack of communication and transparency were highlighted in relation to transfer decisions. Employees were often informed at the last minute, and in some cases, via rumours, without being given sufficient notice or being consulted in the decision-making process, which led to significant personal challenges. These included arranging last-minute childcare due to shift changes for some, and relocating for others.

"Often the people involved in moves aren't told, so they're told very last minute, and they're the people that need most preparation in order to plan where they're going to stay."

"I had a phone call from my manager telling me that they're moving me in a week or two's time. And I just said, 'I don't know how that's going to work, I've got two kids at home'."

"I didn't hear it officially. I heard it through rumours, and it was only until I questioned it did I get told it was happening officially. So there's a little bit of communication breakdown. So I just think that it needs to be completely open and transparent."

"Sometimes they'll tell a friend, or they'll tell someone because it's something to know and then you end up hearing it and you're like 'well this is my life. Am I staying? What am I doing? I have no idea what is happening, someone please tell me'."

Additionally, a high number of green book (corporate and non-operational) staff expressed frustration over limited career opportunities. For many, they perceived there to be no formal promotion pathways or structured advancement. Progression was constrained by departmental structures, low staffing, and reliance on vacancies. More often than not, the only way to progress was seen as 'moving sideways' or leaving NWFRS.

"You usually find that development is filling a dead person's shoes, or you can't progress further until someone leaves. It's almost an attitude that because that is the case, there's no need to put development into our paths."

Training and skills development

NWFRS have made a conscious effort to improve delivery of operational training, with positive results, however non-operational training was seen as a tick-box exercise

We heard that until recently, the training department had generated a culture of fear and excessive discipline which left many feeling apprehensive about attending courses.

"They've only just changed it now, but you were failing these courses in your head before you even got there. They expected a certain standard. These training events are supposed to encourage you to weed out any faults or any sort of weaknesses within groups or individuals — identify that, fix it, move on. But that wasn't there. It was a lot of shouting 'you're not good enough, you're pathetic' using very demeaning words, mocking people, shouting 'you should be doing this, you should be doing that, that's pathetic', there was lots of swearing going on."

"Things are better, the training is better. You go to training and you don't think 'oh they're going to get a massive stick and hit me over the back of the head with it' and stuff like that. Before, people didn't want to go [...] because they didn't know how they'd be treated on the course and stuff like that. But now, it's more of a coaching session as well."

However, training seemed to have improved significantly over the last three years, with a shift towards a supportive, person-centred approach. Most trainers associated with the old culture had left, and new processes have been put in place that focus on individual development needs and learning styles, including consistent rather than reactive provision of development plans. Additionally, attendees can give anonymous feedback to NWFRS, which has been overwhelmingly

positive — 99% of respondents (n=315) for operational courses in 2023-24 reported being satisfied or very satisfied.

In contrast, training focused on people management and interpersonal skills was often perceived as a 'tick box exercise' and was criticised for lacking meaningful substance, particularly in areas like equality, diversity, inclusion (EDI), wellbeing, and cultural awareness. The survey showed varying uptake of such training, with 77% of respondents receiving EDI training compared to 38% for unconscious bias training (see Figure 10). While 68% rated the EDI training as useful or very useful (see Figure 11), many felt reliance on e-learning platforms like LearnPro reduced its effectiveness due to a lack of depth, interaction, and engagement, limiting its ability to foster meaningful understanding.

"I think all staff find the computer based 'learning' a hindrance and a bore. It is a tick box exercise, very few actually read or pay attention to them, it's just click, click, click, and done. Staff would benefit much more from actual classroom learning and exercises."

"NWFRS does deliver a lot of training on these subjects via E-Learning. I understand the need for this due to time constraints, but the better quality training sessions I have experienced have always been 'in the flesh' with an opportunity for group discussion etc."

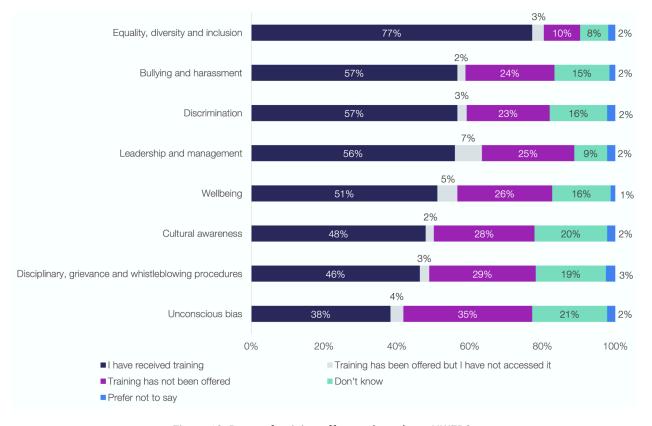


Figure 10. Rates of training offers and uptake at NWFRS

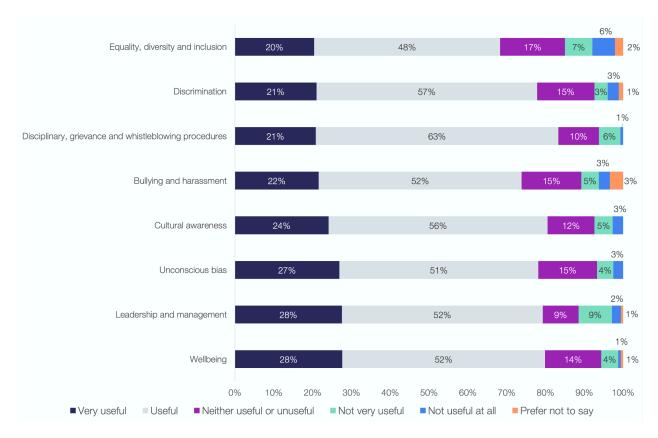


Figure 11. Ratings of training usefulness at NWFRS

Insufficient training on person-centred management approaches, including handling difficult conversations, leaves managers unprepared, causing minor issues to escalate and overburdening HR and formal processes

While command and control is essential for managing the incident ground, broader people management requires a person-centred approach focused on two-way dialogue, wellbeing, and tailoring to individual needs. However, staff reported that NWFRS is not adequately equipping or supporting managers to adopt this style, despite recognising its importance.

Managers are provided with leadership and management training through the Institute for Leadership and Management (ILM), NFCC online learning, and dedicated middle leader and supervisor leader seminars. Notably, 22% of survey respondents with management responsibilities had not received, or were unsure if they had received, management and leadership training. We heard from, and about, operational managers — often long-serving staff who have spent their whole careers in the service — struggling to transition from a discipline-based management style to a more, person-centred approach. Without sufficient training and support to managers, managers are being set up for failure.

"Operationally, predominantly, you are having to do as you're told, because if you're on an incident ground [...] [and] you're told to do something by your superior, you do as you're told. [...] I'm not in a life critical situation when I'm having my challenging conversations. But I think that's where you're going to see the culture struggles is that a lot of these people who are 30 years deep, and don't want things to change, they're operational, so they're used to being on the fire ground and giving orders and saying 'that this is how it's been done', whereas now they're managing people, in offices as well, and they don't understand how to do that because they're not trained as people people, they're trained as incident people."

"It's almost impossible to manage people now [...] you ask someone to do something and they take offence to it. It's really really frustrating sometimes. And you want the support from above but they shun from providing that support."

"What we're probably not very good at at the moment is taking that person-centered approach. They're really struggling to have that difficult conversation. So it's about understanding, taking a more individualistic approach [but] we don't currently have that."

"Even the operational side of the service is more 'office based' these days, because prevention work and regulations are doing their job. So there is even more emphasis on people management."

The most significant gap in management training, consistently highlighted across roles, was in handling difficult conversations. This is an essential skill for addressing issues like performance or workplace conduct, fostering transparency, accountability, and a shared understanding of expectations. While training in this area exists, it is not mandatory, leaving many managers unprepared. Individuals reported that this led to minor issues escalating unnecessarily and creating an over-reliance on HR or formal grievance and disciplinary processes.

"Many many disciplinaries that I get involved in are down to poor management of a very minor situation that gets escalated and escalated and escalated."

"Things are often pushed up to HR when it should be a line manager's responsibility, and it is fear of having difficult discussions, and they do training on difficult discussions but this isn't mandatory."

"We have feedback from our discipline and grievance officers who are saying, actually a lot of these issues would have been best served at a much earlier stage, through having those difficult conversations [...] so they probably need a little bit of help and support, giving them the confidence to have a difficult conversation, giving them the confidence that they can do so in a constructive way and resolve the issue and move it forward without having to resort to a discipline or a grievance as being the only mechanism."

"Seriously, it's a simple conversation that comes up to us, and it gets escalated to us. And we had so many cases, ridiculous cases, but if it was [a] simple conversation at the bottom, just a conversation of 'you said something that's really upset me. Could you apologise?'. If that person knew that they'd upset them at that point then it would have been squished, but because it's escalated so far, people are so angry, and they've gone months and months and stewed on it, and it gets ten times worse."

"When it gets to that point [a formal process], they go, 'I didn't actually know that that hurt their feelings, and I actually feel really bad that it hurt their feelings', but no one's open to having conversations. We don't train them in that."

Professional development was experienced inconsistently, with individuals' line managers having a disproportionate impact on outcomes

Poor management training has led to what were seen as inconsistent approaches to professional development across NWFRS. While some managers were said to actively support their staff's development, others were described as neglecting individual needs and training opportunities, significantly affecting career progression and employees' sense of value at work.

"It all depends on who your line manager is. Mine's quite good, so he sort of coaches a little bit, but most of the time it's just, you gotta learn on your feet, you just sort of get thrown in and just hope for the best."

"The effect of having a good and a bad manager on how you progress as a person can make a massive difference. [...] I had quite a bad experience, like I say, in my first four years, and I've recently moved and just in the few months that I've been on the watch that I am on, the station that I am [on], has just like, yeah, it's just sort of excelled me massively in the right direction and, and that's just the difference of just one manager who's just sort of, he, listens, he understands, he's practical, but also, you know, empathetic to how different people are on the watch. And so just having that one person has really made me feel a lot more confident about, sort of, where I am."

Although the appraisal process allows employees to discuss training needs with their managers, outcomes were often said to lack follow-through. Staff and former staff reported that appraisal data, recorded in a matrix, seems to disappear into a 'void', leaving training access largely dependent on the discretion of individual managers. While some managers actively seek training opportunities for their teams, others do not. A small number of staff mentioned having to resort to paying for their own training. This inconsistency is partly due to an outdated 2012 policy, which outlines the previous appraisal process but provides no guidance on completing the more recently implemented matrix, its purpose, or how to follow up on training requests.

"As a manager, you are supposed to fill this matrix in and send it off into the ether, into the void."

Experiences of prejudicial and unacceptable behaviours, reporting and investigation

Bullying and harassment are widespread in NWFRS, with over two-fifths (42%) of survey respondents reporting personal experiences since June 2021, and nearly half (49%) having witnessed such behaviours

Over two-fifths (42%) of survey respondents had experienced one or more of the following types of bullying or harassment at NWFRS since June 2021: abuse of power, intimidation, sexual harassment, discrimination, inappropriate use of social media, and bullying or harassment of any other form. Abuse of power (28%) and intimidation (20%) were the most commonly reported behaviours experienced by staff and former staff. Nearly half (49%) of survey respondents had witnessed one or more of the types of bullying and harassment listed, with a third (33%) reporting witnessing abuse of power and 23% witnessing intimidation.

Whole-time firefighters were most likely to report both experiencing and witnessing such behaviours, potentially reflecting the ingrained hierarchical nature of the operational side of the fire service, where those in senior positions may misuse their authority by 'pulling rank' to justify poor conduct, such as bullying.

Staff and former staff who engaged reported examples of belittlement, intimidation, and verbal abuse, particularly from managers. Senior leaders and principal officers were frequently identified as perpetrators; among those who witnessed abuse of power, 40% attributed it to senior leaders and 43% to principal officers (see Figure 12).

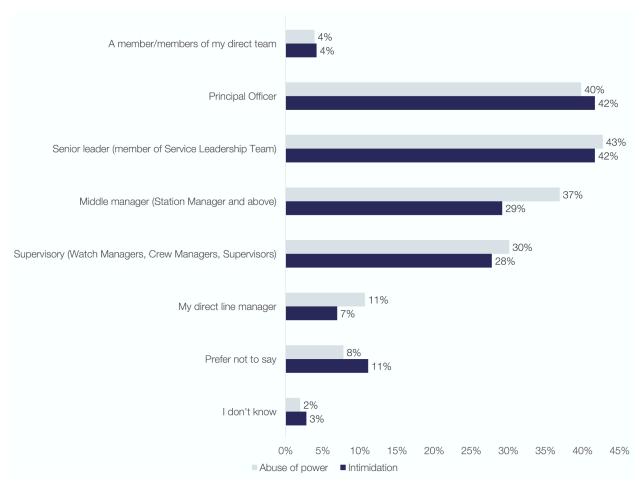


Figure 12. Proportions of different groups who survey respondents claim they witnessed carrying out abuse of power and intimidation at NWFRS

"He was abusive, confrontational, and made me feel degraded and unsafe at work."

"She would berate and embarrass me. This went on and got worse, with her shouting at me, calling me stupid, and swearing. I would go home in tears and at one low point I almost quit the job I love."

"I recall moments where he became visibly angry — his face turning red, raising his voice, slamming the desk in front of me, and pointing his finger to underscore his point. These outbursts create a tense environment that not only stifles productive conversation but also sends an unmistakable signal of dominance and intolerance for dissent."

Abuse on social media also appeared as an issue from our engagement, with 7% percent of survey respondents reporting being a victim of inappropriate use of social media, and 16% witnessing inappropriate use of social media. According to NWFRS investigation data, 5 investigations relating to the misuse of social media took place since 1st June 2021. There are known 'trolling' accounts

run by NWFRS staff or former staff, one of which used a photo of NWFRS's HR team to criticise recruitment practices (to which NWFRS responded with their support for the HR team and zero tolerance towards bullying via social media). Abuse on social media was said to lead to feelings of suspicion and unease among staff.

"There's a lot of this stuff coming on social media and it's so difficult to get a hold of [...] I think they hide behind that [anonymity] and it's horrible and you feel like you're working among people who are doing stuff like that. It's just not a nice feeling."

Over 1 in 6 survey respondents (17%) reported experiencing discrimination in the last 3 years, while almost 1 in 4 (23%) reported witnessing it, with gender-based discrimination being the most common type, highlighting entrenched issues of sexism at NWFRS

Both male and female former and current staff reported experiencing discriminatory behaviour, particularly related to gender, however women (in both operational and non-operational roles) were more likely than men to report experiencing discrimination (19% compared to 14%).

Women we engaged with frequently pointed out issues of sexism within NWFRS that affected their daily experiences. They felt this sexism was rooted in the male-dominated nature of firefighting and societal perceptions surrounding it. Women in operational and managerial roles were often considered less capable, facing disrespect for their abilities and rank — sometimes attributed to positive action (see here). A minority of staff and former staff we spoke to within NWFRS were still of the belief that operational roles are primarily suited for men, with women seen as more appropriate for roles that 'support' this operational delivery. For instance, women in operational managerial positions reported having to work harder to have their voices heard and respected, only to be labelled as overly emotional or angry when they succeeded. In contrast, women in corporate roles were perceived as being in positions that were more 'appropriate' due to the office-based nature of those jobs. At the same time, many positive examples of male allies who quickly challenged misogynistic behaviour were highlighted.

"I'm undermined quite a lot, quite a lot of the time, and I hold my own, but sometimes it gets really, really frustrating [...] I'll be sat in meetings and told 'obviously you're new to the role' when I've been in the role for years, and there is a male colleague sat next to me who's been in for two months."

"I've had quite a few instances with men speaking down to me because I am a woman, that it's good I'm in an office based job, because that's where I belong, behind the desk doing paperwork."

"I am respected for my admin skills, my soft skills, my girly things. But I'm not allowed an opinion that contradicts theirs."

"The amount of times I have been described as aggressive... Well, actually I'm just assertive, but then I get called bossy but actually I'm just being a leader. When I challenge them I'm labelled as difficult, but actually I'm creative and I have new ideas, and I'm passionate. But if I was a man, I wouldn't be labelled assertive, I'd just be respected."

Discrimination against women ranged from everyday microaggressions, such as receiving emails that began with 'Dear gents,' to more serious and distressing instances of harassment. These included accounts of inappropriate messages, public humiliation, and cases of sexual harassment. According to survey data, 2% of female respondents had experienced sexual harassment, while 6% of all respondents had witnessed it. Since 1st June 2021, NWFRS investigation records show 4 investigations into sexual harassment, 6 into domestic abuse, and 3 related to discrimination based on race or sex.

"[Operational staff member] made sexual advances [...] as well as inappropriately touching another female on three occasions."

"There are managers who [...] after accusations of bullying, sexual harassment and assault, who the service has failed to deal with and therefore failed to justify those victims."

Men who reported personal experiences of discrimination most often perceived this to be a result of NWFRS's approach to positive action, which was often referred to as positive discrimination against straight, white men (see here).

"Recruiting too many women. Turning down good men in favour of women who then get pregnant."

"Positive discrimination to tick boxes is itself discriminatory especially to white heterosexual males".

Underreporting, insufficient or inconsistent responses to reports of unacceptable and prejudicial behaviour, and systemic avoidance, all contribute to a culture of impunity

Many staff who witnessed prejudicial or unacceptable behaviour in the past chose not to report it. 28% of survey respondents who had observed such behaviour did not report it, while 34% reported some but not all incidents (see <u>Figure 13</u>). NWFRS misconduct investigation data showed 12 cases of bullying and harassment and 11 cases of other inappropriate behaviour investigated since 1 June 2021. Based on the incidents reported in the survey results (i.e. 33% witnessing

abuse of power and 23% witnessing intimidation), this further suggests that the vast majority of bullying and harassment cases are not reported and/or do not reach the stage of investigation.

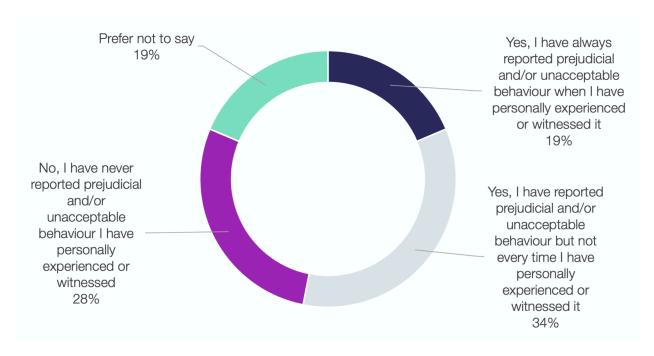


Figure 13. Rates of reporting witnessed or experienced unacceptable behaviour at NWFRS

This lack of reporting is often driven by the belief that perpetrators face no consequences and therefore 'get away' with their behaviour. Staff and former staff described a tendency at NWFRS of reports not being adequately investigated, encouraging individuals to withdraw complaints, or alleged perpetrators moving teams or retiring with full pensions (despite the service not having the power to stop staff from retiring), often without facing repercussions. It was also noted that occasionally victims are moved, rather than addressing the behaviour of the alleged perpetrator. This was perceived to happen more in relation to middle management or senior leaders, with staff and former staff frequently expressing the sentiment that there was 'one rule for us, one rule for them'. The perceived inaction in response to reported unacceptable behaviour by ACFO X (see Box 2) and other often cited and well known examples have further reinforced this belief.

"History has shown staff that if we were to report or make a complaint against a senior manager/leader, nothing would change. The matter would be covered up."

"This is unacceptable that staff should be moved or feel they need to leave when being bullied or harassed. The service needs to resolve the actual issue or person causing the issue rather than moving the victims."

Of those who did report the behaviour they witnessed or experienced, 58% of those whose reports were dealt with via informal routes were dissatisfied with their experience, while 26% were satisfied. Of those whose reports were dealt with formally, 53% were dissatisfied with the process of reporting/speaking up, and 73% were dissatisfied with the outcome (see Figure 14). The most common reason for dissatisfaction was the belief that reporting the behaviour negatively impacted their career (49%) — see Figure 15. This sentiment was echoed by staff and former staff, who felt that speaking up resulted in a 'black mark' against them, hindering their promotion and progression prospects (see here). That the most common reason for not reporting misconduct in the future was due to staff feeling it would negatively affect their career suggests there is a long way to go before speaking out against inappropriate behaviour is recognised as a valuable contribution to the culture of the service.

Other concerns that emerged from our engagement included being denied or discouraged from union representation, a lack of independence during the investigatory process, and a perceived 'guilty until proven innocent' approach.

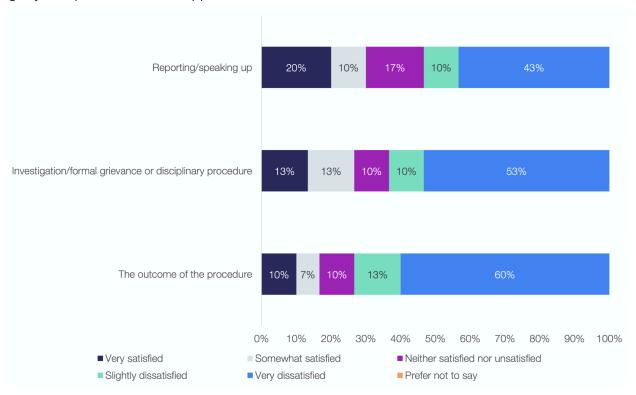


Figure 14. Rates of satisfaction with different stages of formal reporting routes at NWFRS

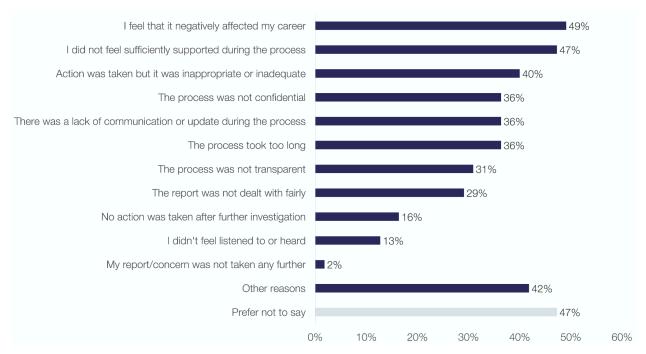


Figure 15. Reasons behind negative experiences of reporting at NWFRS

"If you did something that displeased SLT, you had to pay penance for it, and not being promoted was one of the big ones."

"The likelihood is that the complainant themselves would become a target for senior managers."

This perceived lack of action and consequence for unacceptable behaviour had a significant impact on those that reported it. Witnessing and reporting unacceptable behaviour had as much of an impact on staff and former staff as those experiencing it: witnessing unacceptable behaviour had a significant emotional impact on 23% of respondents, while 22% of those who reported behaviour they had witnessed experienced a significant emotional impact.

"I would really hesitate to make a complaint and challenge [in]appropriate behavior again, because in my eyes, nothing has happened, and what's the point? And that upsets me, because I'm not that kind of person — if I saw something, I would have to say something. But what I'm saying is I would begrudge taking it any further, because all I feel now is shame. I feel ashamed that I did it [report], because I must have been making a mountain out of a molehill, because nothing's been done. And I just feel like, I worried for ages that I've just been dubbed as a problem, you know someone that was gonna just create drama. Yeah, honestly all of it was exhausting, and I don't think I could put myself through that again."

"I have felt angry and frustrated that certain individuals get away with their behaviour, as if they are gatekeepers and hold all the keys. I am made to feel, as I will not go along with it, I am the problem."

"Witnessing prejudicial and unacceptable behaviour within the North Wales Fire and Rescue Service has had a profound impact on my perception of the workplace and my overall morale. [...] It's difficult to feel motivated or positive when such conduct seems to be not only tolerated but normalised within the organisation."

The lack of transparency and communication about investigation outcomes reinforces the belief that prejudicial or unacceptable behaviour goes unpunished, fuelling perceptions of a non-transparent culture at NWFRS

Bullying and harassment is covered under NWFRS's discipline policy. Under Acas guidelines, the disciplinary outcome and details must remain confidential. However, 'where appropriate, employers should talk privately with any staff involved to let them know that the process has finished — this would include talking to the individual who raised the complaint'.³⁴

Of those who were dissatisfied with their reporting experience, 36% were dissatisfied because there was a lack of communication or update (see Figure 15). NWFRS was seen as 'hiding behind GDPR', using it as an excuse to not communicate outcomes or to obscure decision-making. This led to the perception that nothing was done, with the alleged perpetrator 'still walking around' with no repercussions for their actions. There is no guidance under the discipline policy on when and how complainants should be provided with information regarding the outcome of their complaint. This lack of guidance significantly increases the risk of inconsistent practice and resultant dissatisfaction or mistrust among complainants.

"I raised an incident of inappropriate behaviour. It was investigated and as far as I am aware there has been no consequences for that person [...] No one has been able to tell me what the outcome of that was."

"Unfortunately it is always the same. They hide behind GDPR [...] In our service they can't actually stand up and say 'this individual did wrong'."

"Everything is cloaked in secrecy and confidentiality stipulations."

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³⁴ Acas disciplinary procedure - <u>Step 6: After the disciplinary</u>.

"I've been involved in so many of these [investigations] where there's either no outcome, or the individuals who made the complaint receive no outcome [...] and it was always GDPR that was used as an excuse."

"I got to the end of my experience, and I was simply told that it had been dealt with. And I sought further explanation, and I was told we can't tell you anymore because of GDPR."

"If you go to the police and report a crime, you should find out what happens, but for some reason [in NWFRS] you don't feel like justice has been done and you don't understand."

Health, safety and wellbeing

Changes to auditing standards resulted in concerns among current and former operational staff members about health and safety at NWFRS

The disbanding of NWFRS's Professional Service Standards (PSS) department in 2021 was raised as contributing to the service's culture. PSS was previously responsible for undertaking investigations into matters of conduct and auditing operational standards across NWFRS, with a particular focus on health and safety. The delivery of PSS was criticised in interviews with a small number of staff for its aggressive approach, with a small number of staff also expressing in the survey that its disbanding has had a positive impact on organisational culture. However, it was also described by a similar number as being held in high esteem in regards to improving health and safety, reportedly inspiring other FRSs to adopt similar models.

Since its disbanding, the operation assurance and health and safety responsibilities held by PSS have been distributed to area teams with support from a dedicated health and safety department. This has led to perceived inconsistencies in auditing processes and practice, with quality thought to vary based on the motivation of the individual carrying out the process. Some staff expressed apprehension about the potential long-term consequences of the disbanding of PSS.

"There was a department of eight people performing to a very high standard (which effectively now has been disseminated across that workforce) such as accident investigations, grievance work, auditing. So, for example, [the responsibility of] eight people has now effectively gone to 32 station managers. Health and safety is now [...] thrown out to every station manager to carry out investigations under health and safety."

Crest has not attempted to assess health and safety concerns raised during the review.

Staff were of the view that there was an insufficient focus on, and capacity dedicated to, safeguarding at NWFRS

Safeguarding processes and procedures at NWFRS are outlined in a number of policies and documents, including NWFRs's safeguarding policy and procedures on making a referral and recognising types of abuse. Despite these, and the existence of a Safeguarding Committee, during our engagement, concerns were raised by a significant minority about the limited resources allocated to safeguarding at NWFRS, as well as a lack of understanding of Welsh safeguarding legislation and its importance. NWFRS interacts with the most vulnerable members of the community. Despite this substantial responsibility and the safeguarding requirements this entails, the service lacks a dedicated safeguarding team, relying instead on a Safeguarding Lead who manages this role alongside other responsibilities. The planned removal of the Arson Reduction Team in April 2025, which currently undertakes a considerable portion of community safeguarding work and functions as a de facto safeguarding team, was cited as further straining safeguarding resources.

"He's [the Safeguarding Lead] one person. There's one person that does safeguarding, and he's great, but these are like massive legalities that we need to be falling in line with."

"So whilst there wasn't a designated safeguarding team, it was done within [the Arson Reduction Team], but that's going."

"Once you've found your vulnerable person, who do you give that form to, who's contacting social services?"

While good pockets of mental health support were highlighted, inconsistent support for employees on long-term mental health leave remained an issue

Our engagement and document review highlighted efforts across NWFRS to support employees' mental wellbeing. Alongside service-wide initiatives, such as the Critical Incident Debrief and occupational health services available to all staff, we also heard how some managers have proactively fostered mental wellbeing within their teams. For example, one manager introduced case reviews, providing support workers with a platform to discuss any distressing experiences from home visits.

However, the support for employees on long-term sick leave due to mental health issues was reported to be inconsistent. While one participant shared a positive experience of excellent support during a six-month absence following a severe breakdown, the majority of those who had experience of long-term sickness leave who spoke to us about their experiences described minimal

communication, in spite of NWFRS's policy requiring line managers to maintain regular contact with employees on extended sick leave.

Additional concerns included those on sick leave feeling their job security was sometimes being threatened, insensitive pressure to return to work, and insufficient reintegration planning. One in ten (10%) sickness cases at NWFRS in the year ending May 2024 were due to mental health. This is a 14% increase since the year ending 2022. It is understood that NWFRS's Health, Safety and Wellbeing committee is completing a deep dive into mental health absences and support available for staff, which provides an opportunity to explore the increase in mental health related absences over the last few years.

Conclusion

NWFRS is in a transition period. The service has made significant efforts to transform its culture, demonstrating a clear recognition from leadership that change is essential. However, rebuilding trust is a difficult and delicate process, and progress is stalling due to several underlying challenges.

Rebuilding trust requires an acknowledgement that trust is easily lost and difficult to regain, particularly when there are persistent barriers to transparency and communication. Opaque decisions around positive action, promotion processes, and the outcomes of disciplinary investigations put the trust built at risk. Even when these decisions are entirely legitimate, a failure to explain them adequately creates a vacuum within which scepticism and suspicion thrive.

Cultural change has also been hindered by the historical structure of the fire service, rooted in its operational firefighting origins, which has not kept pace with the service's expanding role in public safety. Training and organisational frameworks have struggled to align with these broader responsibilities, adding to the perception of a service stuck in the past, with individuals within middle and senior management resisting or obstructing progress.

The traditional firefighter culture of hierarchy and command and control, with a 'us vs them' mentality, persists. What are sometimes regarded as 'softer' skills of people management, handling difficult conversations and promoting dialogue are still not sufficiently embedded in day to day running of the service. The reintroduction of 'role indicators' in the form of epaulettes, while supported by the majority of operational staff, has the potential to reinforce visible hierarchies within the service at the same time that efforts are being made to reduce such distinctions.

This resistance, combined with a perceived lack of courageous decision-making on some critical issues, reinforces the impression that NWFRS is not fully committed to transformation. For example, while the service defended ACFO X with boldness, it has not been equally forthcoming about explaining other uncomfortable but necessary changes, such as positive action to increase the proportion of women in operational roles. A more transparent and courageous approach is

needed to articulate why difficult decisions are being made and how they address larger systemic issues.

While forward-looking approaches are commendable, there has also been insufficient reflection on past failings, leaving many staff feeling unacknowledged and invalidated. This lack of reconciliation feeds a pervasive mistrust and growing scepticism about the organisation's commitment to meaningful change.

At the same time, the service has not adequately celebrated its successes, such as doubling the proportion of women entering the organisation. While these achievements reflect bold action, the lack of visibility and clarity around them diminishes their impact.

Despite these challenges, NWFRS has shown it can act decisively. The leadership of the current CFO started strong, with a clear vision and ambitious goals set within the first 100 days. However, maintaining momentum has proven difficult, feeding feelings of uncertainty, and the stakes for continued progress remain high.

Moving forward, NWFRS must prioritise transparency, celebrate its successes boldly, and openly confront past and present challenges. By addressing these issues with honesty and courage, the service can regain lost trust and demonstrate its commitment to meaningful cultural change. The path forward is undoubtedly difficult, but with the right approach, NWFRS has the opportunity to set a powerful example of transformation for other public service organisations.

Recommendations

Bolstering accountability and building trust

Acknowledging the past

- The Chief Fire Officer (CFO) should issue a formal, public apology that addresses past wrongdoings, acknowledges their impact on staff, and outlines the commitment to repair and improve
 - This should include commitments to rectify specific identified issues within this review
 - This would demonstrate a genuine commitment to continuing the process of transforming the culture in North Wales Fire and Rescue Service (NWFRS), which would help repair the erosion of trust in the service

Leading by example

- NWFRS's Executive Board and Service Leadership Team (SLT) must make a conscious and sustained effort to lead the cultural change by example
 - The Executive Board and SLT need to embody the principles of openness, accountability, and humility as they steer the organisation towards a more inclusive and supportive culture
 - Each member of the Executive Board and SLT will need to lead by example, which may require them to reflect on their ability to successfully do this
- NWFRS should bring in a culture change implementation specialist (independent to NWFRS and the culture review team) to support leadership in this difficult task, helping them to understand their role in leading the organisation through culture change

Showing decisive action and accountability in response to culture findings

- A live and comprehensive 'culture action plan' should be collated, drawing together all findings and related actions from cultural audits and inspections (for example, this review, the Fire Family Survey, HMICFRS findings and SWFRS's culture review)
 - This action plan should be made public, and updated on a regular basis
 - Staff should be invited to input into the action plan; this could be done through existing fora, such as the Staff Culture Engagement Forum and Siop Siarad (culture cafe)
 - A Performance and Monitoring Officer should be appointed with a dedicated role of coordinating the action plan

Strengthening governance and oversight

- North Wales Fire and Rescue Authority (NWFRA) members should take a more active role in NWFRS processes and working groups to enhance oversight and accountability
- Despite concluding in 2018 that Welsh Fire and Rescue Authorities' (FRA) governance structures were in need of reform, and intervening in South Wales's FRA following the publication of their culture review, the Welsh Government has not taken forward its proposals
 - We therefore recommend that the Welsh Government urgently puts in place governance reforms for FRAs

Ensuring recruitment, promotion and transfer are fair and transparent

Improving trust and reducing tensions in diversity and inclusion approaches

- NWFRS's approach to positive action should be set out in a policy available to all staff, with a particular focus on its use within recruitment and selection
- Service-wide understanding on the importance of a diverse workforce and how positive action supports this goal should be improved
 - This could be carried out via the Siop Siarad (culture cafe)
 - Successes from positive action approaches should be shared with NWFRS staff, both in terms of outcome (e.g. better diversity) and the positive implications of this via staff newsletters and other communications
- An up-to-date review of the adherence of NWFRS's diversity and inclusion approaches with the Equality Act 2010 and Well-being of Future Generations Act, and an analysis of how positive action contributes to the service's adherence with both pieces of legislation, should be completed

Reducing perceptions of bias in promotion

- Feedback should be provided to all candidates following promotion decisions
 - The process for providing feedback should be clearly set out in relevant policies
- The updated promotion process for whole-time management positions should be subject to ongoing evaluation
 - NWFRS should be proactive in gathering feedback from all applicants on the perceived fairness and transparency of the updated process, as well as potential areas for improvement, via anonymous surveys
 - All related policies, including those containing pertinent sections or links, should be revised to ensure alignment with the updated promotion process for whole-time management positions
- NWFRS should consider an independent quality assurance of promotion decisions for a limited time following the publication of this review, to demonstrate the service's commitment to transparency and fairness

Improving the transparency of transfer decisions

 Policies should clearly outline how transfer decisions are made, when employees should be included in the decision-making process, and the appropriate time frames between decisions being made and posts being assumed

Investing in every individual's development

Ensuring consistency of management approaches

- Essential criteria on people management should be included in the competency requirements for all roles with management responsibilities
- The policy for completing appraisals should be updated to ensure it is up-to-date and aligns with current practice
- A centralised system should be implemented to track and address training requests identified during the appraisal process, ensuring consistent follow-through across all teams and departments

Improving the uptake and applicability of management and leadership training

- All individuals in management positions or with management responsibilities should undertake leadership and management training, which is refreshed regularly
- Training on handling difficult conversations should be made mandatory for all those with management responsibilities
- HR should support the upskilling of managers in having difficult conversations
 - For example, when complaints are needlessly escalated to HR and formal processes, HR staff should (where appropriate) support in providing an informal, person-centred resolution for the complainant, working alongside the manager
- Targeted training on identifying and responding to welfare concerns including mental health awareness, accommodating neurodiversity, and work-life balance should be delivered to managers on a regular basis

Improving development and progression opportunities for green book (corporate and non-operational) staff

• Green book (corporate and non-operational) development pathways should be reviewed for areas of improvement, incorporating findings from staff engagement to inform findings, actions, and desired outcomes

Fostering a diverse and inclusive workforce

Improving cultural competence

- The All Wales Equality, Diversity & Inclusion Group should be expanded to focus on cultural issues affecting Welsh fire and rescue services (FRSs)
 - The similar cultural issues affecting all FRSs in Wales could be more effectively tackled by a cross-Wales group which would allow for the sharing of experiences and learning from each FRS's cultural journey
 - NWFRS should use this forum to both learn from others where there are areas of improvement, but also to cascade successes and positive outcomes from their cultural journey so far e.g. in increasing the proportion of female operational staff
 - The cross-Wales group might include public sector partners, including police forces or ambulance trusts, who have had similar experiences and useful learning to share
- The content and delivery method of NWFRS's equality, diversity, and inclusion (EDI) training should be reviewed in line with staff feedback on its usefulness and applicability, as well as input from the All Wales Equality, Diversity & Inclusion Group
 - Based on this review, an updated training offer should be developed, with a focus on building cultural competence
 - This should include mandatory training on neurodiversity and violence against women, domestic abuse and sexual violence (VAWDASV), and an understanding of the importance of this internally and in delivering services to and safeguarding the community

Increasing diversity of thought and experience within the workforce

- The extent of operational competencies required for all roles from strategic manager/area manager level and upwards should be reviewed with the aim of identifying opportunities to open more roles to those without firefighting experience
- A reverse mentoring scheme should be put in place, where more junior staff mentor senior staff across NWFRS
 - This would help reduce the perceived reliance on staff turnover to shift ways of thinking and culture, and reduce hierarchy in the service

Industrial relationships

Fostering mutual respect

- A Trade Union liaison role should be appointed to serve as a neutral point of contact and mediator where necessary, focusing on improving collaboration, identifying shared goals and resolving conflicts where necessary
 - For the first 12 months following their appointment, quarterly meetings should be attended by HR, union representatives and the Trade Union liaison officer to ensure clear communication; prevent misunderstandings; and to track and evidence the relationship between trade unions and NWFRS, including areas for improvement
- NWFRS should monitor relations with the unions, and report on this through their duty to produce annual reports on their social partnership activities in compliance with the Social Partnership Duty
- The Trade Union Protocol should be expanded to cover joint working between HR and the unions

Health, safety and wellbeing

Improving communication and expectation management with complainants

- The disciplinary policy should clearly set out when complainants will hear about the outcome of their complaint, what information will and will not be included, and the reasons for this
 - All complainants should be provided with the above information at the time of reporting
 - As well as improve the transparency of disciplinary processes, this would have an added benefit of improving the wellbeing of staff going through disciplinary procedures, based on the findings of this review

Understanding the impact of disbanding PSS and dispersing responsibilities

 Crest have not attempted to assess health and safety concerns raised during the review but recommend that a review of health and safety arrangements should be completed, specifically looking at trends pre and post the disbanding of PSS, so that any risks or improvements can be understood and acted on early

Reviewing safeguarding capacity

- As the service is increasingly called upon to deal with the safety of vulnerable members of the community, NWFRS should review safeguarding-related demand (including the number of safeguarding concerns raised, action taken, and outcomes) and NWFRS's capacity to respond to these in a timely and appropriate manner
- The extent to which NWFRS staff understand when and how to raise concerns should also be reviewed

Appendix A: Terms of reference

The review's terms of reference were to:

- Undertake an assessment of the organisation's current position in relation to Fenella Morris KC's findings and other relevant studies regarding workplace culture; staff satisfaction and motivation; staff engagement; promotion arrangements; grievance arrangements; and workforce diversity.
- Consider the outcomes of work already commissioned by both organisations in these areas, such as staff engagement surveys and focus groups and the next steps proposed in response.
- Identify and prioritise opportunities for improvement, with indicative timelines for implementation.
- Engage fully and openly with current and former staff and with other interested parties as part of the above. All such engagement will have the ability to be conducted through the medium of English or Welsh.
- Engage and involve appropriately the relevant trade unions and staff organisations in this process.
- Produce a report which will be published in full, except for any details which may identify individuals.