

Consultation Response Form

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Questions for consultation: The Case for Change

1. Do you agree the objectives for reform are appropriate and important?

We strongly agree that the objectives of the reform are important and there is a clear (and undeniable) case for radical reform of the three Welsh Fire and Rescue Services and their relationships to each other, the Welsh Government, the Welsh Local Government Association, Local Authorities, and key stakeholders such as Audit Wales, Chief Fire and Rescue Advisor and Inspector for Wales and the other blue light services.

We note, and are cognisant in this response, that the consultation focusses on those proposals that can be introduced through secondary legislation and policy change with the intention of introducing short-term reforms through secondary legislation in this Senedd term. We do believe that further reform involving primary legislation (most notably around inspection and intervention), is likely to be justified and we would be keen to contribute to any developments.

However, we agree the current consultation objectives are appropriate, in so far as they cover

- Member-level governance appropriately structured to yield informed, efficient and effective leadership and decision-making.
- Members being equipped and empowered to set clear strategic directions for the Services and to holding officers to account for delivery.
- Funding mechanisms yielding demonstrable value for money and being fair and transparent, particularly in the light of wider pressures on public finances.
- FRAs being clearly and openly accountable to local authorities, the Welsh Government and other stakeholders, and should welcome and act on scrutiny, challenge and constructive criticism.
- Audit and inspection being independent, consistently and clearly identify good

and bad practice within the sector and should result in recommendations which FRAs must either accept or offer compelling reasons for taking alternate action.

Our comments are intended to be constructive, and helpful as we draw upon our own and other academic and practitioner research, knowledge of the sector and the arrangements in other devolved administrations.

2. Are there other objectives that the reform programme should pursue?

In addition, we would suggest an additional objective as an overall system objective and another relating to the reform process.

We believe that an overall system objective would be to achieve a regime built upon strengthened collaborations, collective ownership of the challenges and the acceptance of individual and several responsibilities for the safety and safeguarding of the public, their communities and the industry and businesses of Wales.

We are pleased to note that the process for the review has to-date adopted an open, inclusive and reflective approach and that the intention is to produce a *comprehensive regime that responds to the strategic, operational and financial challenges that the services currently face and the challenges they will face in the future*, as both the risk environment and the social, economic and particularly demographic contexts change.

We note that Integrated Risk Management Planning, obligations under the Civil Contingencies Acts and collaborations between FRSs and key stakeholders lie outside the scope of the current consultation (as they may require changes to primary legislation) but they should be considered as part of the reform programme with objectives related to their improvement.

Membership

3. Do you think that membership of FRAs should be reduced to provide for a more streamlined, efficient and effective decision-making process?

There is considerable academic and practice-based research (including our own research), relating to governance, leadership and performance management in public services. (See the CIPFA/IFAC 2014 publication “*International framework: Good governance in the public sector*”). This, together with the evidence from recent experience of the inadequacies of FRS Governance in Wales would very much concur with the view that:

- Member-level governance should be structured to yield informed, efficient and effective leadership and decision-making.
- Members should be equipped and empowered to set a clear strategic direction for the Service and to hold officers to account for delivering it.
- Board level membership with broader expertise enhances strategic direction setting, decision making and the scrutiny of proposals put to the FRAs.

There are some lessons to be learned from the experience in Scotland and Northern Ireland which may be relevant. Scotland and Northern Ireland have opted for national services with an appointed board at the national level, whereas Wales has retained the more traditional local combined FRA model. The Scottish FRS has a Chair and 14 members appointed by Scottish Ministers (after open competitive recruitment), while the Northern Ireland FRS has a Chair and 10 members appointed by the Health Minister, but 4 of them are District Councillors drawn from the 11 District Councils (all after using open competitive recruitment).

In both cases the intention was to capture a broader set of skills, expertise, and diversity. Lakoma (2024a, 2024b) found that members of English FRAs sometimes take decisions that are politically motivated and potentially not in the best interest of services and communities and recommended that individuals on FRAs should be selected based on their skills and sector-specific knowledge rather than political party affiliation.

4. Do you think that local authorities should nominate one FRA member each?

Both Scottish and Northern Irish configurations are recognised as performing more effectively than arrangements in England, albeit not without their own issues (See for example the Murphy, *et al.* 2019 comparison of changes to the FRSs in England and Scotland). The Scottish FRS is much bigger than any of the 3 services in Wales. Having a local authority member from each of the 32 local authorities with independent members would produce a large and no doubt unwieldy and ineffective board. The Scottish FRS therefore appointed LA liaison officers (senior officers rather than politicians) to address the potential loss of communications and manage the relationship with LAs. In practise this arrangement has proven to be both resource intensive and contentious.

In Northern Ireland, another factor that needs to be considered which is that the Local Authorities in Northern Ireland have far fewer powers, resources and responsibilities than LAs in Wales, Scotland or England (collectively their expenditure amounts to approximately 4% of public expenditure in the province). In Wales, the expectation of local representation would also be much higher than their colleagues in Northern

Ireland, and the experience and skill set of LA members at tackling local issues are likely to be stronger in Wales.

Generally, our research on English FRS governance (Lakoma 2024a, 2024b) suggests that a single point of accountability has been more effective in scrutinising services and decision-making (i.e. directly elected individuals, including combined authority mayors and Police, Fire and Crime Commissioners) than a ‘committee’ style board of individuals. Nonetheless, we found that Police, Fire and Crime Commissioner model also has some weak accountability arrangements, including its party-political allegiance and inadequate responsiveness to local communities.

We therefore support reducing the number of FRA members in Wales to reduce the costs. The solution in our view is to appoint one member nominated by and from each LA in Wales (giving 6 members in both North Wales FRA and Mid and West Wales FRA and 10 members in South Wales FRA) with the balance on a smaller board to be independent members chosen for their relevant skills and experience after a fair and open recruitment process.

5. Do you think that FRAs should also have independently appointed members?

Yes, we think they should. Independent and Non-Executive Director (NED) members have consistently been shown to improve corporate governance boards not only in FRS but across the public services (as well as in the private sector). For example, in English FRAs, there tends to be a mixture of political and co-opted members from partner organisations, such as police or NHS Trusts (Lakoma 2024b).

Independent NEDs are appointed to all Government Departments and all Non-Departmental Public Bodies in England; to all NHS Trust Boards; to National Park Boards and many more public bodies. In the great majority of these cases Independent and Non-Executive Directors members tend to be in a minority on the Boards (even if they have Independent Chairs). This would reinforce their identity as a local rather than a national service.

6. Do you think that independent members of FRAs should be appointed by Welsh Ministers?

As mentioned above, appointment by the devolved authority is currently the case in Scotland and Northern Ireland.

It is essential for the credibility and the effectiveness of the appointees that independent members of FRAs should be Ministerial appointments following open and appropriate independent recruitment process. Ministerial appointments also have a level of esteem and influence that allows the posts to attract better quality candidates

for the posts. (Members of the NTU team have held numerous ministerial and non-ministerial appointments).

7. Do you agree that independent members should make up one third of an FRAs overall membership?

To establish this as a 'one third' requirement appears to us to be too inflexible. However, in the circumstances and in practical terms, this would result in boards of 9 members in North Wales FRA and in Mid and West Wales FRA and a board of 15 in South Wales FRA. These appear reasonable numbers and sizes given there are 11 members of the Northern Ireland board and 15 in Scotland and both boards appear to function well. We therefore support the Welsh Government establishing them on this basis.

8. Do you think that independent members should be appointed to act as full members of the FRA?

We believe this will be essential if they are to be accepted, credible and respected by the LA representatives and to take ownership and be effective in their roles. This is the relationship that pertains in Non-Departmental Public Bodies and NHS Trusts. If they are not full members, they risk the possibility of being considered advisers and providing advice which full FRA members can disregard if they choose.

9. Do you believe that FRAs should have independent Chairs, and if so who should appoint them?

To impose an independent chair on FRAs would work against the spirit of collaboration and mutual support and respect that has characterised the relationship between the Welsh Government and public bodies in Wales since devolution. It is also unnecessary, particularly in view of other proposed changes in this consultation.

If Welsh FRAs are to continue to be (see themselves and act as) local rather than central public bodies, then independent chairs should not be mandatory. The role of Chair should be chosen by the members of the Board from all members of the FRA, other than in a situation where poor performance or other serious improprieties has led the Welsh Government to invoke formal intervention of an FRA/FRS and Commissioners or Lead Officials have had to be appointed.

Funding

10. Do you agree that FRAs should be required to formally consult with a view to reaching agreement with local authorities on the level of FRA funding each year?

We have continually argued in oral and written evidence to multiple meetings of the Public Accounts Select Committee and the MHCLG Select Committee that the Local Government Finance System requires radical and comprehensive change (see for example Murphy 2019, Murphy *et al* 2025). We have also argued that the Barnett formula used to allocate public expenditure to the devolved administrations of Scotland, Wales, and Northern Ireland also needs a fundamental review. More recently we have argued that the recently announced Fair Funding methodology for allocating funds based on local needs will not address some of the fundamental inadequacies of the system and will not be fit for purpose in the long-term.

The systems for supporting local delivery of public services requires a comprehensive and strategic reassessment of both the income and the expenditure of local public services, with new systems based on appropriate funding formulas for the distribution of financial support to put in place. This would then become the basis of multi-year settlements *inter alia* to Local Authorities and Fire and Rescue Authorities. However, we appreciate that in order to produce new arrangements that are fair and robust to all authorities and that will endure over a number of years will require primary legislation and a considerable amount of work and preparation and will not be available in the short term.

For the short-term, the consultation identifies 3 possible approaches.

a. Direct funding by top-slicing the Revenue Support Grant

As the Consultation explains, this would create better accountability to the Welsh Government but would not provide local accountability. It would be inconsistent with the local governance model for FRAs, suggested elsewhere in the consultation proposals, and would be inconsistent with the spirit of collaboration, mutual support and respect that is and should be a beneficial characteristic of the delivery of public services in Wales.

b. Introducing a Council Tax precept

The consultation states that some local authorities favour this option but also states it is not being considered at this time. Introducing a Council Tax precept could increase FRAs accountability to local communities as each FRA would be able to decide on the amount of precept they wish to raise, subject to capping arrangement (see Lakoma 2024b). On the other hand, Council Tax is one of the most regressive taxation systems in the UK fiscal regime. Extending precepting to another (non-directly elected) body or adding an extra tax to council taxpayer's bills would not be popular, efficient or fair – still less would it help making local taxation more progressive.

c. Modifying the current system with some form of external control on or agreement about the levels of contributions.

We agree that FRAs should be required to agree the level of funding each year with their constituent local authorities (which will provide some local accountability). However, in addition to the consultation and evidence requirements suggested in the bullet points in chapter 4, we would suggest some additional requirements.

- Collectively they should seek an independent external auditor's opinion on the reasonableness of the overall proposals for each of the three groups of authorities before they finally sign them off.
- The Welsh Local Government Association (or some other suitable body) should be asked to facilitate negotiations (if required) to ensure rapid agreements are reached by all three groups.
- That a financially qualified independent arbiter be established (nominated by the Welsh LGA or Audit Wales) to ensure a timely decision is taken so local government budgets-setting is completed within statutory timescales.
- Subsequent agreements should look to endure for three years to facilitate a level of stability and forward planning within the FRAs.
- Each group should be asked to develop a funding formula for future use in agreeing contributions.

Performance Management and Inspection

11. Do you have any views on how and to whom reporting against the National Framework should take place?

In England, the Chief Inspector of HMICFRS provides an annual 'State of Fire' report which he presents to the relevant Secretary of State (currently Secretary of State for Housing, Communities and Local Government but previously the Home Secretary). This includes the outcomes of inspections but also includes comments and views on national issues collectively affecting the sector and, at times, the performance (or lack of performance) of the government of the day.

The statutory reporting on the National Framework is bi-annual and, as enshrined in Section 25 of the Fire and Rescue Services Act 2004, should include any formal steps the government has taken to secure compliance with the National Framework.

NTU have previously reviewed the adequacy of all the Section 25 reports from 2010 up to and including the 2020 report (Spencer *et al* 2019, Murphy and Lakoma 2020) and found every one of the reports to be clearly inadequate with only partial consideration of relevant issues. The early reports were little more than statements that the Secretary of State was satisfied that fire and rescue services had been acting in accordance with the framework, although the National Audit Office and the Public Accounts Committee

were later to dispute how the DCLG could give such an assurance given the inadequacy of the DCLG sponsorship and monitoring arrangements.

A quote from the Murphy and Lakoma article of 2020 demonstrates the seriousness of the inadequacy.

“Throughout the 2010-2020 period there have been various man-made and natural disasters that have challenged the capacity and capabilities of fire and rescue services and changed the risk profile they are facing at national, regional, and local levels. Natural disasters have included widespread flooding, storms, wildfires, and other adverse and extreme weather incidents caused by climate change. The human-caused disasters in addition to Grenfell and the Manchester Arena attack have included major train crashes in Plymouth and Suffolk as well as increasing terrorist incidents and in 2019 there was a significant rise in fatal motorway accidents as a result of so-called “smart” motorways. In fact, both human-caused and natural disasters have increased in numbers and severity throughout the last ten years, but *successive Section 25 reports have not mentioned any of them.*”

(Murphy and Lakoma 2020. p. 20)

In the circumstances in Wales, and noting the intention outlined in this consultation to provide for a strengthened broader inspection programme integral to the overall governance and accountability arrangements for FRAs (see below for our comments on the two short term options), we consider it should be a report from the CFRAIW to the Equality and Social Justice Select Committee of the Welsh Parliament, who should then report on their considerations to the Welsh Government. In addition, we would like to re-emphasise that FRAs should be primarily accountable to their local communities through the delivery of the National Framework.

In our view, external inspections are part of the wider public scrutiny process of public services rather than part of the governing process (although transparency requirements should (and do) make them available to all key stakeholders). We have always considered the Ofsted process, where the reports are presented to Parliament and are subject to scrutiny by the Education Select Committee before the Ofsted report and the select committee report go to the government.

12. Do you agree with the principles and requirements for an inspection programme for Wales as set out in the consultation document?

We agree substantially the principles and requirements for an inspection programme for Wales as set out in the consultation document and we also agree the 2016 National Framework is out of date and “needs to change to provide for a strengthened broader

inspection programme that forms an integral part of overall governance and accountability arrangements for FRAs”. We suggest some detailed amendments where the outline principles bullet points and the intended operationalisation of those principles (six bullet points) could be beneficially strengthened or clarified.

The first issue of crucial importance that we agree with the consultation on is the need for a new, robust and up to date National Framework to ensure (in the words of the consultation) you create “an inspection programme that covers all FRA’s duties and functions, and should encompass people and culture, equality and diversity duties, governance, strategic direction and community risk management as well as efficiency and effectiveness, value for money and operational delivery”.

We note that the former Chairman of the National Fire Chiefs Council (Mark Hardingham) is reported in the Equality and Social Justice Select Committee report (2024) that changes in England meant there was periodic scrutiny and routine inspection of fire services across all their functions.” This, in our view, is inaccurate as HMICFRS inspections, whether under the 2012 National Framework or the 2018 National Framework, have never been comprehensive, and they have not adequately covered a number of the strategic issues (most notably organisational culture, the adequacy of the Integrated Risk Management Planning arrangements, strategic political leadership or the adequacy of the resource base of authorities) and have never addressed the medium and long-term sustainability of the service. This is despite these facts being regularly highlighted by academics and practitioners since the (then) Coalition Government’s Minister for Fire announced a ‘Strategic Review’ of the service in 2010 (Murphy and Greenhalgh 2011a, 2011b) and committed to producing what became the 2012 National Framework. The 2018 Framework has been equally deficient on these issues (see for example Murphy and Glennon 2018, Murphy *et al* 2020) and is itself now in need of review and replacement.

We agree that individual inspections need to be broad and thorough (first bullet point) but believe this should include references to them being comprehensive (including covering all strategic and operational issues) and assess the financial and operational sustainability of the services in the short, medium, and long term.

We think individual inspections should seek to “identify and report” on specific risks and challenges rather than just being “flexible enough to encompass emerging risks and challenges in the sector”. The former wording is more appropriate to individual inspections; the latter phrase is more synonymous with inspection programmes and annual sector reviews such as the annual State of Fire reports in England.

We consider that there should be a commitment to publicly consult on the medium term inspection plans and standard inspection criteria and methodology (as is done in England) so that all stakeholders can input views rather than a limited range of chosen

stakeholders, and with this provision, we would then support the plan being discussed with FRA and agreed with Welsh Ministers before publication and implementation.

13. Do you agree that there is a need for a different approach to be taken to FRS inspection in Wales. If so, what aspects of the options in this paper should be progressed?

Recent evidence and experience in Wales strongly suggest that there is a clear case for a different approach to be taken to FRS inspection in Wales. We note again that the Welsh Government have not ruled out more radical change to the inspection programme in the longer term that may require primary legislation. We have therefore focussed on the current options noting and supporting the intention that “whatever model we use, the new Fire and Rescue National Framework will include a clear expectation that FRAs will act on all inspection and independent review findings” and that “consideration will also be given to a requirementfor FRAs to report on their progress against all inspection and review recommendations.”

There are two potential issues that affect both options. The first is that both options (not just the first option) will require extra resources whether these are in-house resources or commissioned resources. The second is that either may be a temporary arrangement if more radical changes to inspection (and government engagement and intervention) are required in the longer term.

Option 1: Welsh Ministers appointing (independent and experienced) inspectors and other officers to undertake a more comprehensive inspection programme.

This is in many ways the standard format around the world for Fire Inspectorates particularly in smaller independent countries with relatively few local services. It is of course different in Scotland and Northern Ireland where there are single national services and primary scrutiny, and inspection is at the national as opposed to local level.

The consultation correctly points out that this option would require additional resources for a comprehensive inspection programme to be introduced, for standard inspection material to be developed and shared, and for reports to be published in a format suitable for the public and other stakeholders. We note that although the CFRAI is already in post, the Equality and Social Justice Select Committee reported that most of the evidence submitted to them favoured maintaining the separation between the CFRAI and the potential new inspectorate (ESJC 2024). Standard inspection material will need to be developed and shared, and for reports to be published in a format that is suitable for the public and other stakeholders under both models, although given the material available on these issues in Scotland, England and elsewhere, this should not be an onerous or time-consuming element of the changes.

Option 2. External Procurement or Commissioning inspection services whether building on existing inspectorates in Wales, England and Scotland via formal procurement, commissioning or partnership arrangements.

This second option (external procurement) was formally explored to a relatively minor extent in England prior to the establishment of HMICFRS in 2018. The former Her Majesty's Inspectorate of Constabulary were one option and commissioning 'Blue Light Works', an external collaborative partnership who had previously worked on digital technology with the police and the Home Office were external candidates (Murphy 2017). These were the only two options and no details of the evaluation of these two options have been published and a decision to create HMICFRS in its current form was quickly made.

The commissioning/procuring of external UK Inspectorates also has recent precedents involving both HM Fire Service Inspectorate in Scotland (HMFSI), HMICFRS in England and external consultants in Wales. As mentioned above, Northern Ireland have commissioned HMFSI on a few occasions and these two areas share the characteristic of being national fire services. Following the removal of elected members from their governing role, the commissioner of SWFRA commissioned a "full efficiency and effectiveness" service inspection by HMICFRS (HMICFRS 2025), and Mid and West Wales FRS and North Wales FRS jointly commissioned the recent inspections from Crest Advisory consultants (aligned and supported by the Welsh Government).

HMICFRS used an established inspection methodology (i.e. the 2022-2024 methodology rather than the current 2025-2027 methodology) with adjustments for the context of the South Wales FRS. The reports on NWFRS and MAWWFRS used a similar methodology to the one used on SWFRS. We have referred to the inadequacies of this model in our response to Q12 above. The 2025-2027 HMICFRS methodology goes some way to mitigating these deficiencies but does not fully address them.

In the circumstances, we believe Option 1 would allow inspection capacity and capabilities in the Welsh context to develop as soon as possible, and we would suggest that both HMFSI and HMICFRS should be approached for formal assistance.

The final comment on the second option (but is equally true of the first option) states that it might involve alignment of inspection programmes, processes, inspection criteria and approaches to grading performance between England and Wales. In our view, this is likely to involve changes in primary and secondary legislation in more than one administration and is likely to take a considerable length of time. It should therefore be considered as part of the long-term changes to the performance management regime for Fire and Rescue Services across the UK, rather than changes that can be accommodated within the new secondary legislation.

General

- 14. We would like to know your views on the effects that the policy proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?**

We must caveat our comments with the information that we would claim no specific knowledge, expertise or experience in multi-lingual administrative areas or countries. We suspect that nearly all other responders to the consultation may be better placed to comment on this question and the next. However, one thing we would have liked to do with our representation, would have been to have used hyperlinks to embed access to our intext references and reference list and for these and other hyperlinks to provide the embedded information in both Welsh and English.

Another issue is the proposal that independent board members should supplement elected members to broaden the range of skills and experience available to the FRAs. In these circumstances, we assume candidates who speak Welsh would be positively welcomed. Similarly, when making appointments to either of the two options for new inspection capacity (under Q.13) we assume candidates who speak Welsh would again be positively welcomed in all organisations and roles across Wales. We are assuming all future policy and guidance and other documentation arising from this policy-making process and its implementation will be available in both languages.

- 15. Please also explain how you believe the policy proposals could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.**

Please see our response to Q14.

- 16. We have asked a number of specific questions about FRA governance, finance, performance management and inspection. If you have any related issues which we have not specifically addressed, please use this space to report them:**

One significant and closely related issue that is particularly pertinent in the Welsh circumstances at this time, is the nature, extent, efficiency and effectiveness of the intervention arrangements (often referred to as the intervention regime) available to the

Welsh Government and the powers and responsibilities behind their deployment when faced with evidence of unacceptable performance or behaviour in FRAs or FRSs, such as happened recently in all three Welsh FRAs and FRS. In 2025, all three Welsh Fire and Rescue Services (FRSs) were subject to independent cultural reviews, revealing serious concerns including bullying, harassment, and outdated operational practices (Welsh Government, 2025). We suggest the Welsh Government commissions a formal review of its intervention protocols for FRAs and FRSs to ensure they are fit for purpose. This review should include stakeholder engagement and benchmarking against best practices in other UK nations.

The approach and reality of intervention policy and practice in Welsh LAs and in Welsh FRAs has been very different from the approach, policy and practice in English LAs and in English FRAs, although we believe both regimes are in urgent need of review under both administrations. For example, as of early 2025, 30 English councils were receiving a combined total exceeding £1.5 billion in Exceptional Financial Support (EFS), with several under formal intervention, compared to no equivalent structured financial intervention regime currently active in Wales (MHCLG, 2025). A comparative study of intervention regimes across devolved administrations should be commissioned to identify gaps and inconsistencies. This would support the development of a coherent and equitable framework for Welsh FRAs.

In the case of English LAs and FRAs, intervention policy and practice has been different (in terms of objectives, mechanisms, protocols, actors, responsibilities, and roles) between LAs and FRAs. Historically, the intervention regime for FRAs has been less intensive, with more supportive mutual relationships between the government and the FRA/FRSs than that developed for LAs (Coleman 2009, Murphy and Lakoma 2025). For instance, between 2018 and 2025, eight English councils issued Section 114 notices under the Local Government Finance Act 1988, triggering statutory interventions, and over 30 English councils in financial distress have received Exceptional Financial Support from the government (LUHCC, 2024). There are no equivalent mechanisms in Wales.

There have also been very significant differences between the regimes at different times, with the post-2010 regime in LAs and FRAs being very different from the LAs and FRAs regimes under the pre-2010 regimes introduced by the previous UK Labour Government from 2002 (LAs) and 2005 (FRAs) (Murphy and Jones 2024, Murphy and Lakoma 2025). The post-2010 regime saw a shift from strategic regulation and performance frameworks (e.g., CPA/CAA) to more reactive financial interventions, with over £1.5 billion in EFS allocated between 2020 and 2025 (MHCLG, 2025). Future reforms should reintroduce proactive performance management tools alongside financial oversight. The aim should be to create an ‘early warning’ system, prevent crises and reduce reliance on emergency interventions.

The current UK government is currently in the early stages of re-examining the current regime for interventions in “failing” and “financially distressed” local authorities that are currently in either ‘engagement’ or formal ‘intervention’ as well as those in receipt of Exceptional Financial Support. In 2024–25, the UK Government provided £685 million in capitalisation support to Birmingham City Council alone, highlighting the scale of financial distress and the urgency of reform (MHCLG, 2025). While immediate reforms may be premature for Wales, the Welsh Government should begin preparatory work to assess its intervention and support arrangements for failing or financially distressed. This would ensure readiness and policy coherence when medium- to long-term reforms are introduced.

Although this is clearly an urgent and related matter in Wales, as much as it is in England and is not specifically addressed in the consultation, in our view it is not an issue that should be addressed in the immediate term as part of the current reforms but does need to be part of the agenda for medium-term or longer term reforms.

References

CIPFA/IFAC 2014. “*International framework: Good governance in the public sector*” available at <https://www.cipfa.org/policy-and-guidance/standards/international-framework-good-governance-in-the-public-sector>

Coleman, P. 2009. Fire and rescue improvement: A report prepared for DCLG on the approach and lessons learnt 2005–2009. (unpublished ODPM Archive)

Equality and Social Justice Select Committee. 2024. Sound the Alarm: The governance of Fire and Rescue Services. Cardiff: Welsh Parliament.

Lakoma, K. (2024a). A comparative study of governance changes on the perceptions of accountability in Fire and Rescue Services in England. *Public Administration*, 102(1), 3–20. <https://onlinelibrary.wiley.com/doi/full/10.1111/padm.12923>

Lakoma, K. (2024b). The implications of governance changes on understandings of accountability: The case of Fire and Rescue Services in England. Doctoral dissertation, Nottingham Trent University. Available at <https://irep.ntu.ac.uk/id/eprint/52951/1/Katarzyna%20Lakoma%202024.pdf>

Levelling Up, Housing and Communities Committee (LUHCC). 2024. Financial distress in local authorities: third Report of Session 2023–24. Available at: <https://committees.parliament.uk/publications/43165/documents/214689/default/>

MHCLG. 2025. Exceptional Financial Support for local authorities for 2024–25. Available at: <https://www.gov.uk/guidance/exceptional-financial-support-for-local-authorities-for-2024-25>

Murphy, P. (2017) Independent inspectorate in danger of becoming Home Office handmaiden. *FIRE*, 112 (1398), pp. 9-11. ISSN 0142-2510 Available at https://irep.ntu.ac.uk/id/eprint/30709/1/PubSub8451_Murphy.pdf

Murphy, P., 2019. Oral evidence presented to the Housing, Communities and Local Government Select Committee of the House of Commons relating to Local Government Finance and the Spending Review 2019. London: Parliament TV.

Murphy, P., Dom, B.K., Eckersley, P., Lakoma, K. and Jones, M., 2025. Written evidence to the House of Commons Public Accounts Committee on Local Government Financial Sustainability. London: House of Commons.

Murphy, P., and Glennon, R. 2018. Governance reforms go off the boil. *FIRE*, 113 (1405), pp. 31-33. ISSN 0142-2510 Available at https://irep.ntu.ac.uk/id/eprint/32712/1/PubSub10216_697a_Murphy.pdf

Murphy, P. and Greenhalgh, K., 2011. Creating the new national framework for fire and rescue services. *FIRE*, 103 (1341), pp. 2-4. ISSN 0142-2510

Murphy, P. and Greenhalgh, K. 2011. Strategic review offers unique opportunity. *FIRE*, 103 (1333), pp. 34-35. ISSN 0142-2510 Available at https://irep.ntu.ac.uk/id/eprint/10176/1/213003_8284%20Murphy%20Publisher.pdf

Murphy, P. and Greenhalgh, K. 2011. Creating the new national framework for fire and rescue services. *FIRE*, 103 (1341), pp. 2-4. ISSN 0142-2510

Murphy, P. and Jones, M., 2024. How the UK government responds to financial, service, and corporate failings in local authorities: intervention and monitoring. In: United Kingdom Association for Public Administration (UKAPA) Inaugural Conference 2024, University of Birmingham, Birmingham, 12-13 September 2024. https://irep.ntu.ac.uk/id/eprint/52239/1/2216970_Murphy.pdf

Murphy, P. and Lakoma, K. 2020. The (mis) interpretation of Section 25 of the Fire and Rescue Services Act 2004. *FIRE*, Sept 20, pp. 17-20. Available at https://irep.ntu.ac.uk/id/eprint/41398/1/1379667_Murphy.pdf

Murphy, P., and Lakoma, K. 2025. Central government interventions in fire and rescue services in England and Wales. In: United Kingdom Association for Public Administration, Ulster University, Belfast, 10-12 September 2025. <https://irep.ntu.ac.uk/id/eprint/54381/>

Murphy, P., Lakoma, K., Eckersley, P. and Glennon, R. 2020. *Rebuilding the fire and rescue services: policy, delivery and assurance. Emerald points*. Bingley: Emerald Publishing Limited. ISBN 9781838677589

Murphy, P., Lakoma, K., Greenhalgh, K. and Taylor, L. 2019. A comparative appraisal of recent and proposed changes to the fire and rescue services in England and Scotland.

In: P. Wankhade, L. McCann and P. Murphy, eds., *Critical perspectives on the management and organization of emergency services*. Routledge critical studies in public management. Abingdon: Routledge. ISBN 9781138097650.

https://irep.ntu.ac.uk/id/eprint/36640/1/13952_Murphy.pdf

Spencer, T., Hayden, J., Murphy, P. and Glennon, R., 2019. Stating the obvious: evaluating the state of public assurance in fire and rescue authorities in England. *International Journal of Emergency Services*, 8 (1), pp. 20-33. ISSN 2047-0894.

<https://www.emerald.com/ijes/article-abstract/8/1/20/116493/Stating-the-obviousEvaluating-the-state-of-public?redirectedFrom=fulltext>

Welsh Government. 2025. Consultation on the reform of fire and rescue authorities in Wales 2025. Available at: <https://www.gov.wales/sites/default/files/pdf-versions/2025/8/5/1756476366/consultation-reform-fire-and-rescue-authorities-wales-2025.pdf>

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