

Government Response: *The Firefighters' Pension Scheme (Wales) (Amendment) Regulations 2025*

Technical Scrutiny point 1: The Welsh Government acknowledges the definitions appear in a different order in the English and Welsh texts and accepts that it would be preferable for the same approach to have been taken in each. We do not however consider this affects the meaning or clarity of the Regulations.

Merit Scrutiny point 2: The consultation provision within section 21(1) of the Public Service Pensions Act 2013 requires the Welsh Ministers to, before making scheme regulations, consult such persons or representatives of such persons as appear likely to them to be affected by the regulations. We consider the preamble wording accurately reflects the consultation undertaken and that the requirement has been complied with.

Merit Scrutiny point 3: Most Welsh Government consultations on matters relating to firefighters' pensions are publicly available and are not limited to specific organisations, although noting that for some changes a more focused approach may be taken. The Welsh Government aims to draft consultation documents that are accessible to individual scheme members, their employers and representative bodies.

In practice, the persons most likely to respond to consultations on matters relating to firefighters' pensions and who the Welsh Government normally expects to consult with, are the members of the statutory Firefighter Pension Scheme Advisory Board for Wales. The Board is also a forum for detailed collective discussion of matters relating to firefighters' pensions, including these Regulations, which were drawn to the specific attention of the Board, and discussed by it on several occasions. The membership of the Board includes all the employers and recognised representative bodies of firefighters in Wales. In light of the Committee's comments we have published a [statement](#) clarifying the persons that the Welsh Ministers would normally expect to consult before making scheme regulations.

Merit Scrutiny point 4: The Welsh Government acknowledges that it may have been clearer to have referenced the specific sub-paragraphs. We consider the preamble however makes it sufficiently clear that the consultation requirements were complied with.

Merit Scrutiny point 5: The Welsh Government notes this point. Definitions of "retained firefighter" and "volunteer firefighter" have been included within new regulation 119A to assist the reader, specifically individuals acting as retained and volunteer firefighters, to understand which tier each role falls within.

Although these definitions only refer the reader to regulation 3 (interpretation), their inclusion was considered helpful in light of the wider context and definitions used for the roles of crew managers to chief fire officers which do not include regular, volunteer or retained firefighters for the purpose of new regulation 119A.

Merit Scrutiny point 6: The Welsh Government accepts that the references to “September 2005” are an error, but do not consider it will cause any confusion in practice. The Fire and Rescue Services Rolemaps issued by the National Joint Council for Local Authority Fire and Rescue Services have been in place for 20 years and have not been updated since August 2005, meaning no later versions exist. They are in day-to-day use within the sector and therefore it is considered that persons the Regulations are relevant to would consider the reference to “September 2005” as a clear and obvious typographical error.

As noted by the Committee, regulation 3 of the 2015 Regulations correctly refers to the Fire and Rescue Services Rolemaps issued by the National Joint Council for Local Authority Fire and Rescue Services in August 2005 in respect of the definition of “role”. The Explanatory Memorandum also contains a link to the Rolemaps which are clearly noted as those published in August 2005. On this basis, we consider the reference to the Rolemaps is suitably clear and will be understood by those impacted by the Regulations.