

Workforce Report

Purpose of Report

To update the FSMC on matters in relation to fire service industrial relations and pension matters.

Summary

This report briefly describes the main industrial relations and pension issues at present.

Recommendation:

Members are asked to note the issues set out in the paper.

Action

Officers are asked to note member comments

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PENSIONS

Age Discrimination Remedy – Home Office consultation

1. On 8 November 2021, the Home Office launched a consultation on the amendments to the pension scheme regulations to deliver the first set of changes to remove the transitional protections from the FPS 2015: [Amendments to the firefighters' pension schemes in England 2022 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/amendments-to-the-firefighters-pension-schemes-in-england-2022)
2. This includes how the Home Office will ensure that all members of the Firefighters' Pension Schemes who continue in service will be members of the reformed scheme from 1 April 2022. This means closing the legacy schemes to future accrual from 31 March 2022, so that all members are treated equally for future service. This involves moving any remaining legacy scheme members - i.e. those who had received full transitional protections - into the reformed scheme from 1 April 2022.
3. These changes enact the policy announced in February of this year and are consequential to the provisions in the [Public Service Pensions & Judicial Offices Bill](#) (PSPJO) currently before Parliament.
4. The consultation includes a draft set of regulations to ensure that all members build up benefits in the FPS 2015 from 1 April 2022. It also considers two areas where further amendments may be needed:
 - 4.1. Purchase of additional benefits. The policy intent is that existing arrangements for purchasing additional service in the legacy schemes can continue, but no new arrangements can be entered into after 31 March 2022.
 - 4.2. Ill-health retirement (IHR). Provision needs to be made to ensure that a protected member who applies for IHR before 31 March 2022 where the application is determined in their favour after that date is treated no less favourably than if the application had been determined on that date.
 - 4.3. For any ill-health cases that straddle 1 April 2022, the intended policy is the introduction of an "ill-health retirement underpin". This will mean that such members receive an FPS 2015 ill-health pension calculated at the date they actually retire; but that if a legacy scheme ill-health pension calculated as at 31 March 2022 would have been higher, the pension in payment must be increased by the difference between the two.
5. The consultation will run for 8 weeks and will close on Sunday 2 January 2022. There will be an additional consultation in 2022 to address the further changes needed to correct the discrimination, specifically on how the Home Office will implement provisions for the deferred choice underpin
6. Following the end of the public consultation period, the Home Office will consider the responses to the consultation, publish a response as to how the first phase of the remedy is being enacted in the scheme level changes to the Firefighters' Pension Schemes and lay legislation in Parliament to amend the Public Service (Firefighters') Pensions Regulations.

Immediate Detriment Framework update

7. On 19 November 2021, the [FBU and LGA published a joint statement](#) to update colleagues on the impact of [HMRC's policy note](#) of 27 October 2021 and the [Finance \(No.2\) Bill](#) on the Immediate Detriment Framework agreed on 8 October.
8. The content of the Framework was based on the understanding of the PSPJO Bill. The government also needs to make secondary legislation pursuant to the Bill (together, the Remediating Legislation) to provide affected pension scheme members with a remedy for the discrimination found in the McCloud/Sargeant claims.
9. Since publication of the Framework, HMRC published the above documents which both now indicate a move towards making payments of lump sums paid more than 12 months after retirement ('late lump sums') authorised.
10. This is contrary to the earlier indications given by the government and the provisions of the Bill that late lump sum payments would be unauthorised and that under the remedy FRAs would be required to compensate the member for any tax charges which could ultimately be reclaimed from government.
11. Currently both the extent (whether such authorisation would apply in all cases) and the timing (the date from which payments become authorised) are not yet clear and may not become clear until secondary legislation implementing the Finance (No.2) Bill is available.
12. Clarification is currently being sought on the extent and timing of this change and in any case, joint contact will be made by the LGA and the FBU to UK Government seeking to achieve a change of position, primarily on making all late lump sum payments made to remedy the discrimination found in the McCloud/Sargeant claims authorised regardless of when the payments were made.

Immediate Detriment – withdrawal of Home Office guidance

13. On 29 November 2021, the Home Office withdrew its informal and non-statutory guidance on processing certain kinds of immediate detriment case ahead of legislation, with immediate effect. The guidance was originally issued on 21 August 2020 and updated on 10 June 2021.
14. The decision to withdraw the guidance is based on [HM Treasury's best assessment now on the advisability of processing immediate detriment cases](#). The Home Office has stated that, although the decision remains for scheme managers to make, it does not advise schemes to process any immediate detriment cases before legislation is in place, given in its view the risk and uncertainty of correcting benefits before the PSPJO Bill, scheme regulations and relevant tax legislation come into force.
15. The LGA and FBU Memorandum of Understanding and Framework were developed in light of the direction of travel of the PSPJO Bill and discussion with government on its intentions. While this more recent government action should not fundamentally alter the position of the Framework, as the MoU is separate from, and is not subject to or dependent on, any guidance issued in relation to immediate detriment before the legislation comes into force,

the note is a cause of concern to FRAs who are considering adopting or who have adopted the Framework.

16. Also of concern is the Home Office's latest position on funding for immediate detriment, which was communicated on 29 November 2021:
 - 16.1. "... As the Government does not advise that immediate detriment cases should be processed in advance of the legislation coming into force, we will not be in a position to provide any additional funding for those costs which are paid outside of the pension account. These costs include payments that are not considered to be legitimate expenditure under the pension scheme regulations and any associated administration costs including any charges from your pension administrator. These will need to be funded locally by your fire and rescue authority from local budgets.
 - 16.2. In relation to immediate detriment costs paid from the pension account in the course of processing pipeline cases, FRAs will need to ensure that these payments comply with the financing regulations of the pension scheme. If they are considered to be legitimate expenditure then they will be considered for payment as part of the established processes for claiming the AME top up grant."
17. There has never been a guarantee that costs arising from the Sargeant age discrimination legal judgment would be covered by government and therefore its latest action has not changed that. However, the FRAs position has long been that the government must fund all the costs of remedy. The LGA will accordingly continue to seek funding for all the costs arising out of the Sargeant age discrimination pensions claims, whether under New Burdens or otherwise.
18. We are working through the various aspects of the HMT note and its possible implications as a matter of urgency and will provide information to FRAs as soon as it is possible to do so. Members will appreciate the varying specialist natures of the aspects and the complexity of the issues at hand.

The Public Service Pensions (Valuations and Employer Cost Cap) (Amendment) Directions 2021

19. On 7 October 2021, HMT published the [Public Service Pensions \(Valuation and Employer Cost Cap\) \(Amendment\) Directions 2021](#).
20. In February 2019, HMT had paused the cost cap element of the 2016 valuations. This was due to the uncertainty regarding the cost following the McCloud and Sargeant litigation. There is now sufficient certainty regarding the costs and these Directions allow schemes to conclude their 2016 valuations.
21. However, representative bodies across the public sector, including the FBU have launched a judicial review against HMT about including McCloud/ Sargeant remedy costs in the cost control mechanism. They argue that the cost of rectifying the discrimination should not be met by scheme members.

22. The provisional results of the 2016 cost cap valuation showed that the cost of providing benefits all public service schemes was cheaper than expected. This would have led to a reduction in contributions or improvements in benefits from April 2019 had the cost control process not been paused.
23. In a written statement made in February 2021 [[HCWS757](#)], the government said that early estimates indicated that some schemes could now breach the cost ceiling when the valuations are finalised. However, the government decided that any impact on member benefits would be waived, as the mechanism may not have been working as intended.
24. The government also confirmed that any changes to employer contribution rates resulting from the 2020 valuations will be delayed to April 2024.

Scheme Advisory Board (SAB)

SAB and employer levy

25. The SAB and employer budget for 2021-22 has been finalised and submitted to the Secretary of State via the Home Office for approval of the SAB element of the budget. The SAB has received support for setting this levy through the NFCC Finance Committee.
26. A total of £9.16 per active FPS member will be levied on English FRAs to pay for both the work of the SAB and the LGA. This includes the SAB levy of £6.88 and the FRA LGA levy of £2.28. This is an increase of £0.87 per head from 2020-21.
27. The proposed expenditure is higher for 2021/2022 primarily due to an increase in staffing costs to add one full time post and one 0.5 FTE post to the team, to provide additional resilience in governance and communications.
28. This amount distributed across FRAs based on active membership numbers will be invoiced across January 2022, pending approval of the budget. This process will be managed by LGA.

Changes to LGA Pensions Personnel

29. A successful appointment has been made to the role of Firefighters' Pensions Adviser – Employers, with a prospective start date of 24 January 2022.
30. Approval to add the new role of Firefighters' Pensions Adviser – Governance to the LGA establishment has been received and recruitment for this position will commence shortly.

KEY CURRENT WIDER WORKFORCE ISSUES

Pay 2021

NJC for Local Government Services (Green Book)

31. The NJC for Local Government Services (settlement date 1 April) received the claim below in February. Employee representatives on that NJC are Unison, Unite and GMB. Support staff in fire and rescue services tend to be employed on Green Book terms and conditions. Its scope is England, Wales and Northern Ireland.
- A substantial increase with a minimum of 10% on all spinal column points
 - Introduction of a homeworking allowance for all staff who are working from home
 - A national minimum agreement on homeworking policies for all councils
 - A reduction of the working week to 35 hours with no loss of pay, and a reduction to 34 hours a week in London. Part-time staff to be given a choice of a pro rata reduction, or retaining the same hours and being paid a higher percentage of FTE
 - A minimum of 25 days annual leave, plus public holidays and statutory days, for all starting employees, plus an extra day holiday on all other holiday rates that depend on service
 - An agreement on a best practice national programme of mental health support for all local authorities and school staff
 - A joint review of job descriptions, routes for career developments and pay banding for school support staff, and completion of the outstanding work of the joint term-time only review group
 - A joint review of the provisions in the Green Book for maternity / paternity / shared parental / adoption leave
32. A formal offer was made to the trade unions on 14 May, the pay element of which was for a 1.5 per cent increase to all pay points. Other matters included completion of the outstanding work of the joint Term-Time Only review group and immediate exploratory discussions on three other elements of the claim, as follows:
- A national minimum agreement on homeworking policies for all councils
 - An agreement on a best practice national programme of mental health support for all local authorities and school staff
 - A joint review of the provisions in the Green Book for maternity / paternity / shared parental / adoption leave
33. The offer was rejected by the unions, who sought further talks. It was subsequently increased to a [final pay offer](#), including an increase of 1.75 per cent other than on pay point 1 where the offer is 2.75 per cent. All three unions decided to consult their members with a recommendation for rejection.

34. UNISON members voted by a majority of 79 per cent to 21 per cent to reject the final offer. Its local government committee has also decided to begin preparations for an industrial action ballot. It is currently conducting a formal national strike ballot running from 1 December to 14 January. The results will be collated on an aggregated¹ basis.
35. GMB members voted by a majority of 75 per cent to 25 per cent to reject the final offer. It is currently conducting a national consultative ballot (closes Monday 13 December) in order to determine whether there is support for strike action. If there is such support, GMB's subsequent formal national strike ballot will be collated on a disaggregated² basis.
36. Unite members voted by a majority of 81 per cent to 19 per cent to reject the final offer. Unite's local government committee has met and decided to begin preparations for an industrial action ballot. It will run from 14 January to 17 February (24 February in Northern Ireland).
37. FRAs and FRSs have been kept aware of the situation. There is [industrial action guidance](#) on the LGA website and the Workforce team can advise on any specific issues.
38. Members will recall that the matter of a pay award for 2021 for employees within the scope of the NJC for Local Authority Fire and Rescue Services (Grey Book) and NJC for Brigade Managers (Gold Book) has already been settled at 1.5 per cent.

LGA, NFCC and APCC Core Code of Ethics

39. Members will recall that the [Core Code of Ethics](#) and its accompanying guidance, developed in partnership with the NFCC and APCC, were launched in May and welcomed by the Home Office, as well as by HMICFRS and the Fire Standards Board (a supporting Fire Standard was also launched at that time).
40. FRAs are expected to champion the Core Code and include as part of the scrutiny role its implementation and improvements sought and delivered, Senior managers in each service are expected to ensure that as a first step a gap analysis is undertaken to ensure the principles are at the heart of day-to-day activity and reflected in all policies and procedures. Thereafter to embed the Core Code so that the improvements sought can be delivered.
41. Initial feedback suggests that as requested the gap analysis is now taking place within services.
42. A further round of workshops has recently taken place with FRSs to assess progress and to receive feedback on anything else the three partner organisations can do to assist that progress and the delivery of improvement. The majority of services are undertaking, or have completed, the gap analysis stage and are working towards updating local policies

¹ Aggregated - this means that to take action, at least 50 per cent of the national membership is required to vote. The more stringent balloting rules for 'important public services' will not apply as the majority of those eligible to vote will not be delivering such services.

² Disaggregated - this means that action could be taken at each workplace where a turn-out of at least 50 per cent is secured (if members vote in favour strike action), assuming the more stringent balloting rules for 'important public services' do not apply in the particular workplace. If they did then those requirements would also need to be satisfied.

and procedures. A significant proportion of FRSs have already started communications work with employees to embed the principles and are using the Core Code to inform processes such as recruitment. Attendees indicated that they would find sharing of good practice helpful. The three partner organisations will now together analyse the outcomes from the workshops and develop next steps.

Fit for the Future

43. Members will recall receiving updates on the development of an agreed improvement narrative, Fit for the Future, which includes improvement objectives that will give a national sense of direction to the future of Fire and Rescue Services in England.
44. Fit for the Future is a partnership piece of work involving the LGA, NFCC and the National Employers (England) who developed the narrative and objectives based on analysis of the evidence available from a wide variety of sources, including the recommendations of the Grenfell Tower Inquiry (GTI) and the outcomes of inspection by Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS).
45. An update is covered elsewhere on today's agenda, which includes the recent engagement sessions with Chairs and CFOs. The sessions also included members of the National Employers (England) who, alongside LGA and NFCC, remain committed to this work.

Pension Scheme Transitional Protection Arrangements Discrimination Cases

46. These cases concern the issue of whether the transitional protections in the 2015 Fire Pension Scheme (FPS), which provide protections based on age allowing older members to remain in their former final salary scheme, are age discriminatory (other claims were made but it is the age discrimination claim which is the primary one).
47. As they were named as respondents in the case, Fire and Rescue Authorities (FRAs) had to submit a defence to the legal challenge. This defence continues to be managed collectively on behalf of the FRAs by the LGA under the auspices of the National Employers and decisions have been taken by a central steering group which is comprised of a number of legal and HR advisers from varying types of fire and rescue services across the UK, the national employers' Advisory Forum legal adviser, national employers' secretariat, and from the LGA its Corporate Legal Adviser and a Senior Employment Law Adviser.
48. The Court of Appeal found that the transitional protections unlawfully discriminated on age and the case has now returned to the Employment Tribunal for it to determine remedy. Members will be aware that in common with its approach to a request from Government, the Supreme Court rejected the fire authorities' application to appeal.
49. An interim Order was agreed by all parties and the detail is contained in circular [EMP/8/19](#). The Order does not bind the parties beyond the limited interim period before the final declaration.

50. Paragraph 2 of the Order in effect provides that pending the final determination of all of the remedy issues, those that brought claims in England and Wales (the claimants) are entitled to be treated as if they remained in the 1992 FPS.
51. The Order anticipated that the final determination on the remedy issue in regards to membership of the 1992 FPS would be resolved in 2020. That year has passed but in any event it was anticipated that the outcome would be (and ultimately was) affected by what the outcome was on the FRA's Schedule 22 appeal (see paragraph 52 below). It should be noted that irrespective of the Schedule 22 issue it will be some time before this remedy can be put into effect fully for all claimants. Furthermore, there are other issues relating to remedies to be resolved, for example in regards to claims for injury to feelings. In respect of the tribunal remedy proceedings a case management hearing took place on 24 September at which directions were made on the preparatory steps to be taken for a full remedy hearing. That remedy hearing is now listed to take place on 13 – 28 October 2022. Pending that remedy hearing an Order in substantively the same form as the interim Order remains in place. It should also be noted that the Order does not cover those who did not bring claims (non-claimants). However, discussions are taking place on how to provide a remedy for those non-claimants as appropriate.
52. The FRAs had the separate appeal to the Employment Appeal Tribunal (EAT) in relation to their potential defence under Schedule 22 of the Equality Act 2010 (which is that the FRAs had no choice but to follow the Government's legislation) which again was fully considered with the Steering Committee and legal representatives. The EAT held that the FRAs cannot rely on the Schedule 22 defence. The Steering Committee and legal representatives considered whether to appeal the judgment and decided not to. For legal privilege reasons, further information was and continues to be provided to the person nominated by your service to receive communications in respect of this, and related, legal cases.
53. Since the outset, the position of FRAs that any costs arising from these cases should be met by governments has been made clear. Work continues with legal representatives on appropriate approaches to reinforce that position, and a formal letter was sent to government on behalf of FRAs. The same action was taken in respect of Wales, Scotland and Northern Ireland as the National Employers is a UK-wide body. Discussions have taken place between the Home Office and LGA officers as representatives of the FRAs to discuss the costs issues. Most recently, the government was made aware of the development by the LGA (in its role representing FRAs across the UK) and the FBU of a Framework to assist FRAs and pension scheme members to resolve Immediate Detriment issues while remedying legislation is being put in place, which is expected to be by October 2023.

An update on the latest government statements relating to Immediate Detriment are covered under the Immediate Detriment Framework update in the Pensions section of this report above (paragraphs 13 to 18).

54. For background in relation to the Framework, members will recall the legal cases brought in the High Court against the London Fire Commissioner and Nottinghamshire and City of Nottingham Fire and Rescue Authority, supported by the FBU.
55. It was apparent similar issues would arise more widely across the sector. The FBU was clear that matters for affected individuals needed to be resolved sooner rather than later and it would, if necessary, support further legal cases. Many FRAs across the UK on an individual basis had indicated that they wished to be able to deal with Immediate Detriment issues as soon as possible. The problem was not an unwillingness to do so but rather the need to identify and develop a suitable mechanism to be able to do so in a way which minimised the risks while the Government is putting in place the McCloud/Sargeant remedying legislation which it is expected will take up to October 2023.
56. With the support of all FRAs across the UK, the LGA entered into discussions with FBU to identify a mutually acceptable Framework, setting out a mechanism for handling Immediate Detriment cases, to assist all parties prior to completion and implementation of the McCloud/Sargeant remedying legislation. This would help in resolving the genuine difficulties that had arisen for FRAs in making payments to those affected (including for example issues around unauthorised payment charges and contribution holidays) and in removing the potential for court claims more widely across FRAs.
57. During the course of the discussions, the Government laid primary legislation before Parliament in the Public Service Pensions and Judicial Offices Bill and will make secondary legislation pursuant to the Bill (together, the Remedying Legislation) to provide the affected pension scheme members with a remedy for the discrimination found in the McCloud/Sargeant claims.
58. Following a series of complex discussions including respective legal representatives, which were also able to utilise the longstanding national relationship between the LGA and FBU, we were pleased to advise FRAs on 8 October that agreement had been reached on a Memorandum of Understanding and Framework and the details were circulated to FRAs and FRSs on the same day.
59. Both parties believe the Memorandum of Understanding and Framework are consistent with the principles currently set out in the Bill and will mean that appropriate action can be taken prior to October 2023. As and when parts of the Remedying Legislation covering the relevant part of the Framework come into effect the MoU and Framework indicate that the relevant Remedying Legislation will then be used instead.
60. Mindful of the range and complexity of the issues covered upon we worked with legal representatives, specialist QCs and pension specialists, and discussed with HMT and the Home Office. Each FRA was asked to consider adoption of the Framework as it would provide a consistent approach to Immediate Detriment cases across the fire and rescue service and should remove the risk of further legal action supported by the FBU in respect of matters contained within the Framework, assuming it has been applied correctly of course. As set out at paragraph 18 above we are working through the various aspects of the recent HMT note on Immediate Detriment and its possible implications as a matter of urgency.

61. Separately, we and respective legal representatives worked with NFRA and LFC in respect of the High Court cases and settlement was reached. The Summary Judgment hearing that had been due to be heard in the High Court was therefore no longer required.

Defence of other categories of claims

62. Another related category of employment tribunal claims has been issued by the FBU against fire and rescue authorities on behalf of firefighters. In short, the claims relate to members of the 2006 Scheme who were not transferred to the 2015 Scheme (and never will be), which they claim would have provided them with better benefits.
63. We approached FRAs to seek their views on whether they would like the LGA, along with the Steering Committee to coordinate the defence of the new claims on their behalf, as we have done for the original claims. It was explained that this would be on a cost-sharing basis, based on headcount, as for the original claims. The overwhelming majority of respondents were in favour and defences have now been submitted on behalf of the FRAs who have to date received claims.
64. Furthermore, another related category of employment tribunal cases emerged. These were issued by Slater and Gordon solicitors against fire and rescue authorities on behalf of firefighters. Slater and Gordon is working with the Fire Officers Association. In short, the claims are of the same type as the main claims brought by the FBU on behalf of their members in that they allege that the transfer of younger firefighters to the 2015 pension scheme amounts to age discrimination. We anticipate the claims have been brought in order to protect these particular claimants' position in relation to any injury to feelings award.
65. We again asked FRAs if they would like the LGA, along with the Steering Committee which includes representatives from fire authorities, to coordinate the defence of these new claims on their behalf, as we have done for the original claims. The overwhelming majority of respondents were in favour and we have therefore taken this forward and submitted defences. Following that the claims have been stayed pending developments in the original proceedings.
66. Finally, the FBU has more recently issued another batch of employment tribunal claims for its members who had not brought claims before. Those claims are broadly of the same type of claims that have been brought previously and accordingly we are coordinating the defence of those claims on behalf of FRAs.

Matthews & others v Kent & Medway Towns Fire Authority & others

67. This case relates to application of the Part-time Workers (Prevention of Less Favourable Treatment) Regulations 2000 to retained duty system employees. Those Regulations were brought into force to implement the EU Part-time Workers Directive.
68. Members may recall that following a protracted legal process up to and including the House of Lords judgment, settlement agreements were reached in respect of terms and conditions in 2015 with both the RFU (now FRSA) and the FBU in regard to the many

thousands of Employment Tribunal cases relating to potential discrimination under those Regulations. The LGA acted for FRAs through the auspices of the National Employers on the basis of a cost-sharing arrangement with FRAs similar to the arrangements in place for the legal cases already referred to in this report.

69. Defence of the pensions aspect of the case was led by government. The House of Lords judgment allowed those who were serving during the period 1 July 2000 (the date the Regulations came into force) to the date on which they elected to join the 2006 Scheme, to have special provisions which generally reflect the rules of the Firefighters' Pension Scheme 1992 ("FPS 1992"). An options exercise took place to provide for those who qualified for membership of the modified Scheme, to elect to join by no later than 30 September 2015.
70. More recently, work has again had to take place on the pensions aspect of this case. This is because of a European Court of Justice judgment involving part-time judges (O'Brien), which in effect held that remedy could extend back before the Part-time Worker Regulations were implemented in July 2000. This also impacts on the fire service as the impact of the judgment and its interpretation of part-time workers' rights applies across all employers.
71. Consequently, together with legal representatives, discussions are taking place with the government's legal department and legal representatives for the FBU and FRSA on implementing a remedy for the pensions aspects as required by the O'Brien case.
72. As you would expect, we have also raised the concern that this will be unbudgeted expenditure for FRAs should government not provide them with the necessary funding.

Inclusive Fire Service Group

73. The Inclusive Fire Service Group (IFSG) is an NJC for Local Authority Fire and Rescue Services led group. Its membership however is wider and includes the National Employers, NFCC, FBU, FOA and the FRSA. It is unique in that it comprises national employer and employee representation, senior management and trade unions. It considers matters such as equality, diversity, inclusion and cultural issues including bullying and harassment in the fire service with the aim of securing improvement.
74. Having undertaken a detailed assessment of the positions in the fire service it issued a number of improvement strategies, which were widely welcomed with virtually all services indicating their support and providing, as requested, timescales within which they expected to see improvement. The IFSG resolved to monitor and measure use of the improvement strategies at a point when they should be embedded into each service.
75. The monitoring process also captured a range of views comparing original and current perceptions and included a survey of all FRSs; independently run focus groups involving BAME, LGBTQI and female employees and workshops with FRS Equality & Diversity Officers/leads and local trade union representatives. A [full report](#) of the outcomes was issued. (Completion of the analysis to inform the report had been delayed due to resources being diverted to Covid-19 matters.)

76. The IFSG will now consider next steps and discussion is also taking place with HMICFRS in respect of England on how best the work of the IFSG can interact with and inform the work of HMICFRS.

Implications for Wales

77. Each of the wider workforce matters in this report have the same implications for Wales as for England and we are working with WLGA, Welsh FRAs and FRSs as appropriate. The exceptions in this report are the Core Code of Ethics and Fit for the Future, which apply in England only. The WLGA is one of the four employer stakeholder bodies on the NJC for Local Authority Fire and Rescue Services.
78. The immediate detriment matters raised are the same in Wales where the matter of Section 61 of the Equality Act also applies. Given the work to agree a Framework took place under the auspices of the National Employers, it is also available to Welsh FRAs.