Fire Brigades Union submission

Scottish Criminal Justice Committee: Pre-budget scrutiny consultation 2026-2027

05 September 2025

The Fire Brigades Union (FBU) is the democratic, professional voice of firefighters and other workers within fire and rescue services across Scotland and the UK. The union represents the vast majority of wholetime (full-time), retained (part-time / on-call), volunteer operational firefighters and operational control firefighters in the UK.

Over recent years the FBU have made the following submissions relevant to the Scottish Criminal Justice Committee pre budget scrutiny

- Scottish Fire and Rescue Service (SFRS) *Draft Strategic Plan 2019-22*
- SFRS - *Fire and Rescue Framework: Consultation* (November 2021)
- SFRS - *Draft Strategic Plan 2022-25*
- SFRS - *Draft SFRS Strategy 2025-28*
- *Scottish Finance and Public Administration Committee - Pre-Budget Scrutiny Consultation* (August 2022)
- *Scottish Criminal Justice Committee - Pre-Budget Scrutiny Consultation* (September 2023)
- *Scottish Criminal Justice Committee - Pre-Budget Scrutiny Consultation* (August 2024)
- *SFRS Shaping our Future Service Stakeholder Consultation* (June 2024)
- Ongoing engagement in *SFRS Service Delivery Review (SDR)* public consultation.

Additionally, in October 2023 the FBU published our *Firestorm* report, provided to the Scottish Criminal Justice Committee (SCJC) as part of the FBU submission to the committees pre budget scrutiny ahead of the 2025/26 budget. *Firestorm* provides a critical review of the first decade of the SFRS from the operational firefighters and firefighters control that serve the communities of Scotland. The report remains an essential contribution to the debate over what is required for the SFRS to deliver a fit for the future, leading, emergency service that the people and communities of Scotland expect and deserve.

At every juncture the FBU have highlighted that over a decade of under investment in the SFRS has led to the estate, including the current 356 fire stations, becoming increasingly degraded and therefore in an unfit condition for habitation as modern workplaces, cuts to firefighter numbers *(1239 as of 31 March 2025*)* cuts to the number of fire appliances, and hundreds of fire appliances left uncrewed across Scotland every day. **All of which has resulted in increased call handling times, increased emergency response times and increased risk to communities and firefighters across Scotland.**

This submission will continue to build on previous FBU submissions and verbal evidence provided to the SCJC in recent years.

**Source: SFRS Fire Safety and Organisational Statistics, 2024-2025, Tables and Charts*

The Committe have asked for views and comment on the following:

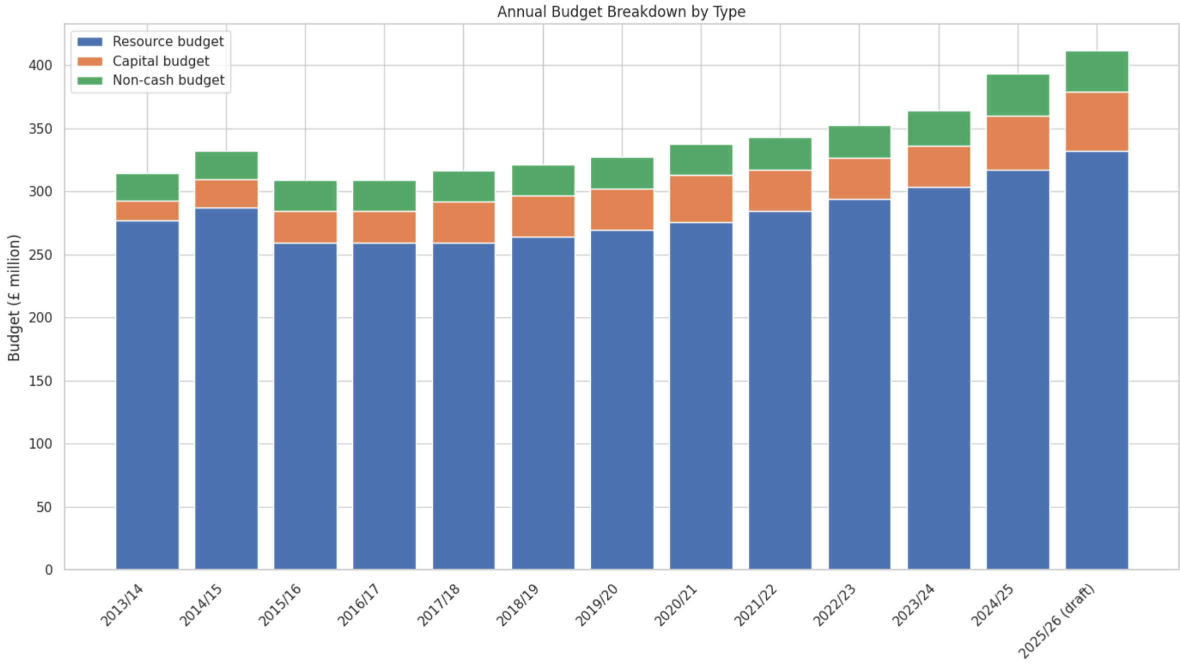
1. **What are the main financial pressures facing organisations in the criminal justice sector**

The FBU will restrict our observations and comment to matters specifically relating to the Scottish Fire and Rescue Service, the impact financial pressures faced by the SFRS has on community and firefighter safety and the inability to swiftly progress meaningful work to resolve the well documented issues with their ageing property and fleet, and progress improvements in areas broadly described as “cultural” within the wider fire and rescue service.

As of February 2025, the SFRS total budget allocation for 2025/26 was £412.2 million, (£332.1 million resource, £47.0 million capital, £33.0 million non-cashable). On paper, all three budget lines show increases over the 12 years of the existence of the SFRS.

However, information obtained from the Scottish Parliament Information Centre (SPICe) shows that against inflation, the year-on-year **SFRS resource budget for 2025/26 has been cut in real terms by £58 million** (17.5% of the current £332.1 million resource budget) since the SFRS was formed in April 2013.

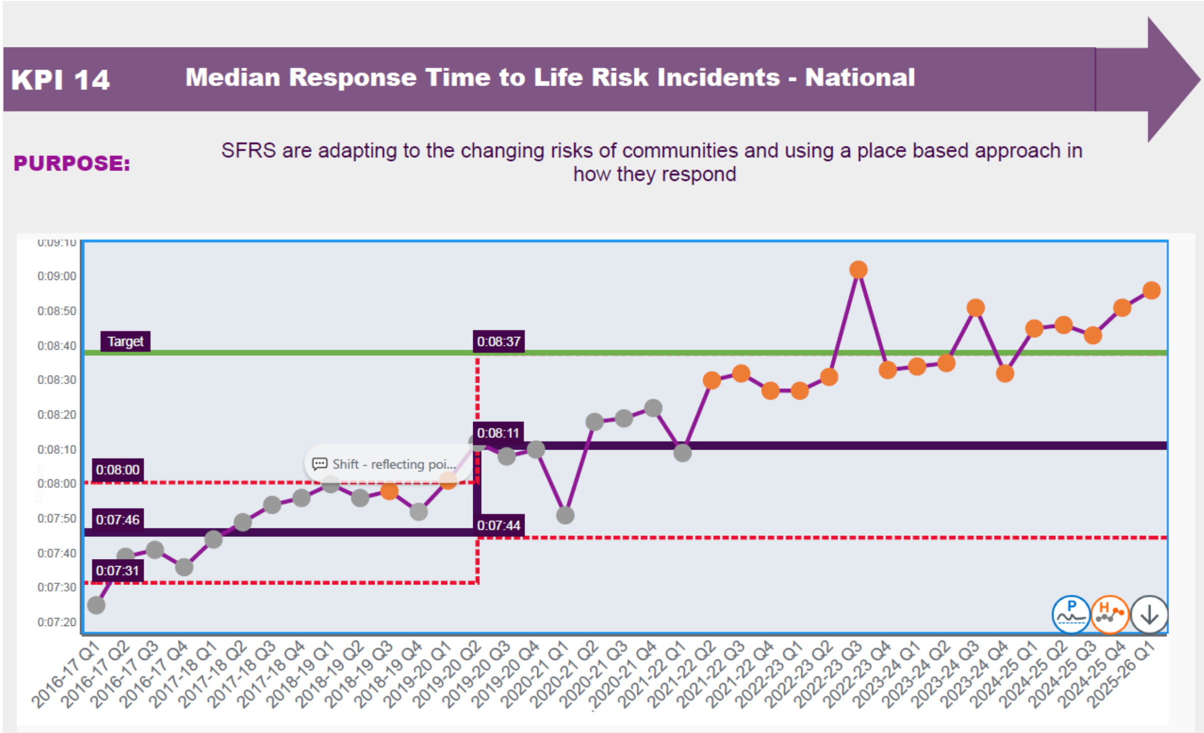
Projected accumulative total savings against inflation from the SFRS total budget were presented by the SFRS in evidence to the committee in their 2024-25 pre budget scrutiny submission where they state; *We forecast that, since the reform of the Service, **the cumulative total of all savings achieved by SFRS is projected to be approximately £908.5 million by 2027/28***.



Source: Figures taken from Scottish Government annual budget

Impact of inadequate resource budget on firefighter numbers and response times

The impact of such significant real terms resource budget cuts has decimated the number of firefighters employed in Scotland, with 721 wholetime (17.4%), 371 retained (12.1%) 63 control (26.9%) and 144 volunteer (34.5%) jobs lost in that time. The direct correlation between these budget cuts, the subsequent cuts to the number of firefighters employed, and spiralling increases to emergency call handling and incident responses times are directly aligned.



Source: SFRS Published Board Papers 28 August 2025

The FBU, again, repeat our legitimate and long-standing concerns regarding the chronic underfunding of the SFRS.

The SCJC were informed in 2024 that sustained underfunding forced the SFRS to "temporarily withdraw" 10 frontline fire appliances and reduce operational headcount by 166 firefighter posts in September 2023. The temporary nature of these withdrawals has been repeated by the SFRS, and additionally by the Minister for Victims and Community Safety on numerous occasions in Parliament.

The SFRS are now engaged in a public consultation covering 23 change options as part of their Service Delivery Review (SDR). These 23 change options include the closure of fire stations, reductions to fire cover, reduction of weekend and overnight emergency response, reductions in firefighter numbers, and "permanent solutions" to the reportedly temporary reduction of 10 appliances and 166 firefighter posts imposed in 2023.

<u>The SFRS SDR consultation documents state that these options will further increase emergency response times.</u>

The FBU have repeatedly raised concerns that neither the SFRS or the Scottish Government had set out a road map to reverse the "temporary removal" of these appliances or the cuts to 166 firefighter posts. The inclusion of "permanent solutions" to the cuts imposed in 2023 is evidence that the FBU concerns were well founded.

Recent large fires in Perth, Dundee, Banchory, Elgin, Fife, Edinburgh and Glasgow, to cite but a few, and the increasing number and severity of large protracted wildfires across parts of Scotland over recent years (reports suggesting that the number of wildfires in Scotland has tripled in just one year) support the FBU contention that chronic underfunding of the SFRS has led to reduced operational headcount (1239 posts since 2013), reduced fire and rescue service resilience, increased response times, and ultimately, increased risk to communities and firefighters.

Data published by the SFRS demonstrates that every staff group (with the exception of the Retained Full-Time role created in 2018 to mitigate gaps in the Retained Duty System (RDS)) has faced savage cuts over the past 13 years. The direct correlation between cuts to operational headcount and increased response times cannot be overstated.

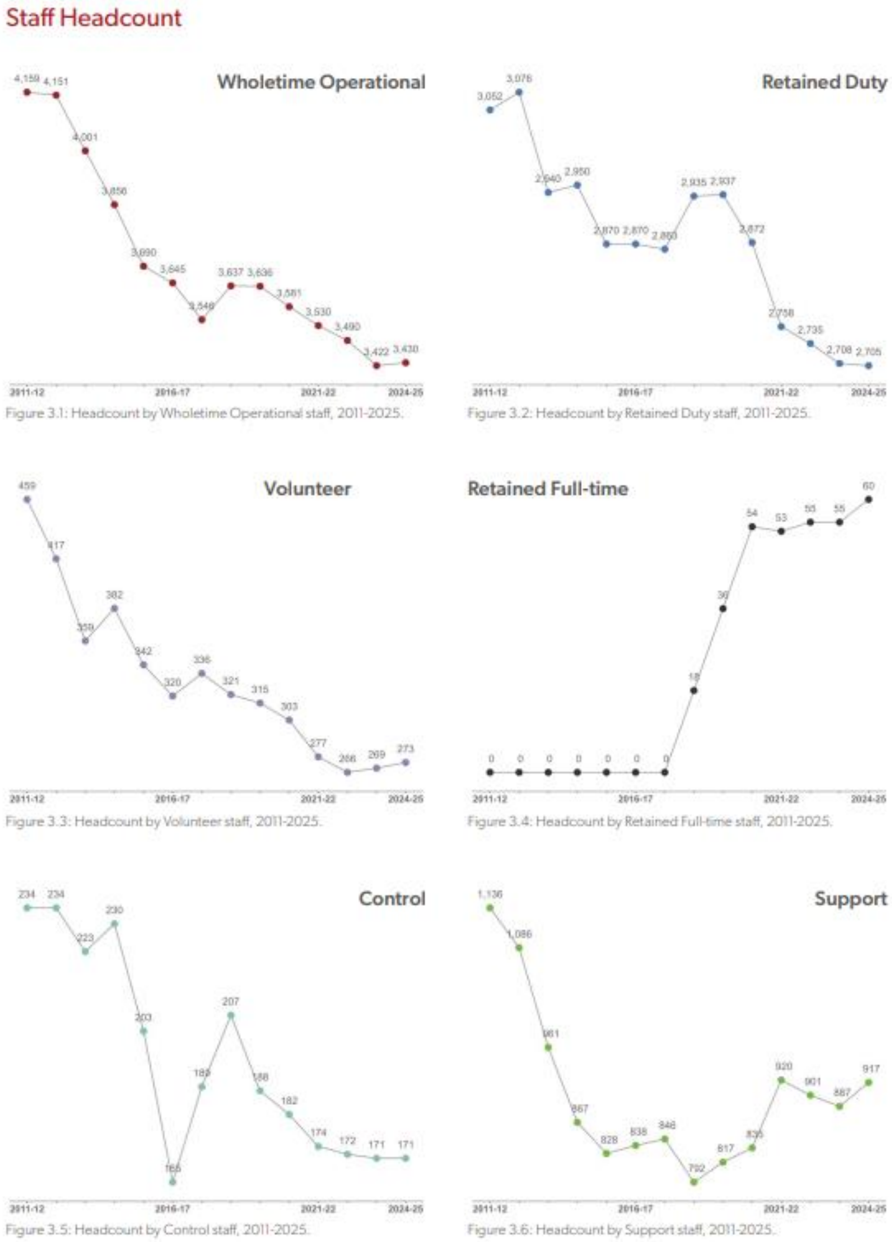


Figure 3.1: Headcount by Wholetime Operational staff, 2011-2025.
Figure 3.2: Headcount by Retained Duty staff, 2011-2025.
Figure 3.3: Headcount by Volunteer staff, 2011-2025.
Figure 3.4: Headcount by Retained Full-time staff, 2011-2025.
Figure 3.5: Headcount by Control staff, 2011-2025.
Figure 3.6: Headcount by Support staff, 2011-2025.

Source: SFRS FSOS2024-2025 Statistics

Impact of inadequate capital budget on SFRS estate and fleet

Against CPIH inflation, the SFRS capital budget has fared better, however this must be measured against the entirely inadequate initial capital budget allocation of £15.3 million in 2013, meaning that minor increases provided over the subsequent 12 years of the single service can initially appear significant in percentage terms but in reality deliver minimal real terms spending for the SFRS to progress capital projects. The SCJC have previously taken evidence from Audit Scotland, the SFRS, and the FBU that the SFRS continue to run a capital deficit exceeding £800 million and require a sustained period of at least £80 million capital allocation per annum over at least a decade to make meaningful progress in providing safe workplaces for their staff.

The SFRS SDR options include proposed reductions to wholetime cover in some stations creating an increased reliance on firefighters working on the retained duty system (RDS), whose primary employment is not with the SFRS but who are on call and respond to pagers when mobilised. If agreed, these proposals will result in a downgrading of fire cover at overnight and at weekends, and in some instances at all times of day in some communities across Scotland.

Throughout the SDR pre consultation process, the SFRS have repeatedly drawn attention to the significant cost of upgrading or replacing stations that include overnight accommodation, pointing to significant financial savings if station upgrades and replacements did not require the inclusion of overnight accommodation. This demonstrates that financial pressure is a primary driver for the SFRS considering increased use of a Day Shift Duty System (DSDS) that will reduce fire cover overnight and at weekends, increase response times, and reduce both public and firefighter safety.

Beyond financial savings, the effect of these proposed changes will be the removal of station based 24-hour fire cover and an increased reliance on RDS firefighters to provide cover overnight and at weekends. The SCJC have previously taken evidence that societal and demographic changes have impacted recruitment and retention across the RDS model resulting in up to 200 of the 311 RDS crewed appliances being unavailable across Scotland on any given day. The SFRS SDR consultation includes options to close eight "long term dormant" stations. All eight are volunteer and/or retained stations that have been unable to recruit or retain sufficient firefighters to form a crew, some since at least 2015.

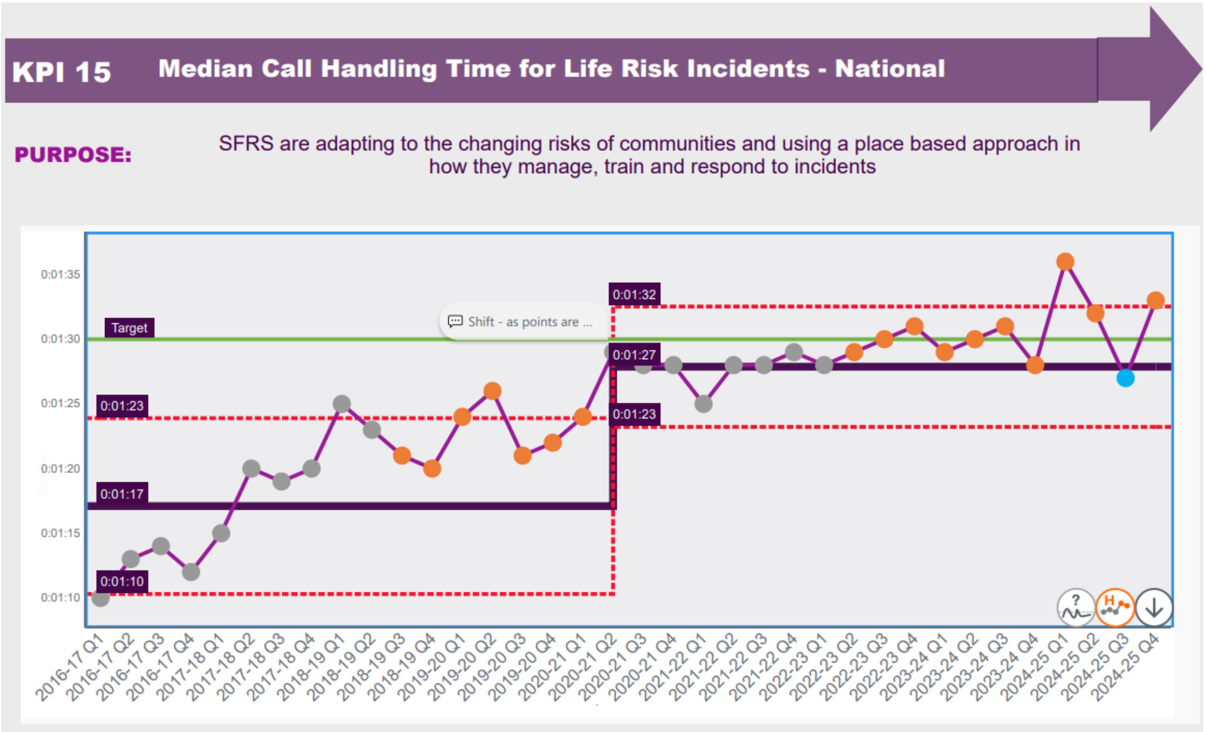
Financially driven proposals that increase reliance on a duty system that is already facing such sustained recruitment and retention issues across Scotland should be a significant concern to members of the SCJC.

2. **What should be the main priorities for 2026/27 in terms of spending in the criminal justice sector?**

It is increasingly apparent to firefighters across Scotland that Scottish Government do not see fire and rescue as a priority area for investment. Due to sustained underinvestment the SFRS are fast approaching a situation where everything is a priority. Recruitment, retention, ageing estate, investment in new technology, training, ageing fleet, over reliance on overtime, insufficient coverage from the retained duty system, improving terms and conditions to improve culture, improving pay structures, implementing a developed role for firefighters including a response to Marauding Terrorism Attacks (MTA), mass casualty events and Emergency Medical Response (EMR) as part of a co-responding model with the Scottish Ambulance Service are all areas where the SFRS need significant investment to allow prioritisation of spending but continue to have extremely limited capacity to divert required funding within their extremely restrictive budget to anything other than reacting to the pressures created through ever dwindling investment.

Continued cuts to firefighter numbers, increased response times, and minimal progress on improving the condition and suitability of their estate all point to a Service attempting to manage financially driven decline, unable to invest in areas that genuinely improve, or in many cases merely maintain, the service provided to the people of Scotland.

Priority must be given to providing the SFRS with adequate investment to reverse over a decade of cuts to firefighter numbers that is ever increasingly impacting call handling times, response times to emergency incidents and community safety.



Source: SFRS Published Board Papers 28 August 2025

The case for investment to allow SFRS to improve culture

The SFRS, as part of the UK wide National Joint Council (NJC), implemented improved maternity provision for firefighters in line with the 2024 pay settlement. Maternity provision now sits at 26 weeks fully paid leave, half of what the FBU believe should be provided. The FBU have campaigned vigorously via the “Fight for 52” campaign, with a number of UK fire and rescue services subsequently choosing to implement maternity leave provision above the minimum contractual requirement of 26 weeks. The SFRS report a desire to increase maternity provision to 52 weeks for all staff but that they have “zero budget headroom” to afford this.

There is justified, significant attention being focused on culture within the sector following damning reports in a number of FRS’s. The SFRS and the FBU agree that improved maternity provision is a relatively inexpensive, but important, lever to improve representation of women in the SFRS and demonstrate their commitment to improving the diversity and culture within the organisation. The fact that financial constraints are preventing the SFRS from making relatively inexpensive improvements should be of concern to members of the SFRS Board, the SCJC, and the Scottish Government. Organisational statistics released by the SFRS on 28 August 2025 show a decrease of 0.9% women in Wholetime, and a 2.4% reduction within RDS operational firefighting roles.

As it stands, new mothers and potential new mothers, are often choosing whether to have a child, or add to their family due to financial concerns and a legitimate, evidence based fear that they may have to cease breastfeeding earlier than NHS Scotland guidelines due to having to return to work in workplaces that may expose them to potentially toxic and carcinogenic contaminants that can be passed to their child through breastmilk.

Maternity provision is just one area of ”culture” the SFRS need to focus on, training of managers and staff, and incorporation of court rulings into policy and the subsequent legislative requirement for dignified facilities all require levels of investment that the SFRS currently report not having the “budget headroom” to invest in. This is trapping the SFRS into situations that could see them face litigation for failures to adhere to legal rulings and health and safety law.

The SFRS aspire to be an employer of choice, the failure of Government to adequately invest in the SFRS is preventing them from achieving this aspiration.

3. **In particular, what are the pressures on capital spend and what should be prioritised?**

It is clear from previous submissions from organisations across the Justice portfolio that decades of underinvestment have left near insurmountable backlogs in capital spending across the entire Justice estate.

It is notable that the replacement of Barlinnie Prison is now estimated to cost almost £1 billion, double initial expected costs. As previously set out, the SFRS estimate a need for around £800 million to bring the 356 fire stations and their fleet, serving every community of Scotland up to a modern, safe standard. This point has been made in representations to the Cabinet Secretary for Finance who cited increased construction costs and inflationary pressures as the reason for project costs for HMP Glasgow increasing so significantly. With an increasingly aged estate, the SFRS face the same increased construction costs and inflationary pressures. The false economy of forcing organisations such as the SFRS to maintain crumbling buildings is an increasing drain on the SFRS budgets.

Without significant investment, the FBU fear the SFRS will be forced to consider further cuts to firefighter numbers and station closures in the future leading to further increased response times and increased risk to the public and firefighters.

Much of the SFRS SDR consultation is focused on the ongoing reality that adequate funding for capital projects to resolve the multiple issues with their estate including the 14 stations built using Reinforced Autoclaved Aerated Concrete (RAAC), implementation of best practice for firefighter decontamination, and for the SFRS to keep pace with technological advances in the sector is not being provided by Government so will have to be found from existing budgets. Without the required real terms investment, the reality is the SFRS will continue to cut firefighter numbers, remove pumps and specialist resources, and close stations in their attempts to reduce operating costs and reduce their capital backlog.

As stated in response to question 1 above, the SFRS have repeatedly highlighted that the level of capital expenditure required to replace or upgrade stations that include overnight accommodation is significant. This is a primary driver for the inclusion of proposals to downgrade fire cover from the 24/7 emergency cover provided through the current wholetime duty system to a Day Shift Duty System (DSDS) with RDS cover overnight and at weekends within the 23 SDR options under public consultation.

The need for the SFRS to provide safe, dignified and legally compliant workplaces for firefighters is well known and was the focus of questioning during the SCJC evidence session on 4 September 2024.

Overwhelmingly the pressures on capital spend faced by the SFRS remain the same as previous years. Lack of real terms capital investment is preventing the SFRS moving with pace to resolve the well documented crisis they face with their property portfolio and ageing fleet. The SFRS continue to miss carbon reduction targets due to an inability to fund carbon management projects across property and fleet due to sustained underfunding of the Service. 47% of the SFRS heavy fleet remains overdue for replacement, resulting in increased maintenance costs for ageing fleet and a subsequent negative impact on carbon emission targets as the SFRS are not utilising modern low carbon vehicles.

In previous submissions to the SCJC the SFRS have stated that '*Ageing assets often incur additional costs due to increased maintenance and repair needs. As these assets age, they are more likely to experience wear and tear, leading to frequent breakdowns and the need for replacement parts. This not only results in higher direct costs for repairs but also increases downtime, which can affect productivity and operational efficiency. Additionally, the energy efficiency of ageing assets typically declines over time, leading to higher operational costs.'* All of which further impact already stretched capital and resource budgets.

The SCJC have taken evidence in previous years setting out the immediate concerns regarding firefighter exposure to toxic and carcinogenic chemicals in the line of their work and the inability to meaningfully and urgently decontaminate following exposure. The SFRS have sought to implement best practice options that are immediately available to them through policy direction and encouraging firefighters to change behaviours in relation to exposure. Financial constraints have limited the SFRS ability to implement service wide improvements to their estate to allow station zoning to prevent cross contamination.

Rapidly resolving this issue must become a priority for the sector.

This will require the capital investment that the FBU and the SFRS have been demanding for many years, it shall also require a change in attitude and increased resource budget to reverse over a decade of cuts to firefighter numbers across Scotland. The savage reductions to firefighter numbers are increasingly impacting the SFRS ability to relieve exposed firefighters from incident grounds in a timeframe that minimises dermal and respiratory absorption of contaminants.

The long-term health impacts from prolonged, accumulative exposure are becoming increasingly understood. Without a change in thinking regarding ways to reduce and limit exposure including the length of time between exposure and full decontamination, fire and rescue services and politicians who have been aware of these risks but continued policies of budget driven decline will increasingly be seen as negligent in their responsibilities towards the health, safety and wellbeing of their employees.

RAAC

The committee have previously taken evidence regarding the SFRS inheriting 14 stations that were built using Reinforced Aeriated Autoclave Concrete (RAAC). Issues with RAAC construction are well documented, the SFRS have required to implement costly monitoring and temporary remediation work whilst permanent solutions are found for these stations. The FBU, supported by the STUC, have previously called for specific ring-fenced funding from Scottish Government to allow public sector organisations such as the SFRS to resolve the RAAC issues they face. To date this has not been provided resulting in the SFRS having to fund temporary and permanent remediation work from a capital budget that is wholly inadequate.

The SFRS have taken steps to begin to resolve, mitigate or remediate RAAC construction, prioritising this work for ongoing and planned capital expenditure with 6 new build station replacement projects at varying stages of development.

As of October 2023, the SFRS own assessment listed 75% of SFRS buildings as being of "bad" or "poor" suitability and around 45% in either "bad" or "poor" condition. Due to significant ongoing financial pressures including the continuation of single year budgets, the SFRS have made limited inroads to resolving the multiple issues that the SCJC have taken evidence on in previous years including a lack of dignified facilities and lack of ability for firefighters to safely decontaminate following exposure to toxic and carcinogenic smoke and chemicals at operational incidents.

The FBU have been informed by the SFRS that this year they have experienced *material increase in costs to maintain fleet and property assets, even after accounting for inflation.* This is clearly an unsustainable cost spiral the SFRS faces. Reducing budgets, when measured against inflation and other cost increases, increased need for maintenance and repair of ageing fleet and property leading to a cycle of further increased costs and negative impact on the ability of the SFRS to deliver on replacement and modernisation of their fleet and property, further impacting the availability of frontline resources, will ultimately lead to the SFRS having to consider further cuts to firefighter numbers, fire appliances and station closures.

Both the SFRS and the Scottish Government have been aware of the serious health and legal implications of these issues for many years; unfortunately, Scottish Government have been either unable or unwilling to provide the SFRS with the necessary budget allocation to meaningfully resolve the increasing issues with maintaining an ageing fleet and modernising or replacing inappropriate property in a timely manner.

This led the Health and Safety Executive (HSE) to issue the SFRS with Notice of Contravention letters regarding material breaches of Health and Safety law and Improvement Notices for 3 stations in Shetland in February 2025. The SFRS have acted to implement the required temporary improvements and the HSE have now lifted the notices they served. It should be noted that this was caveated with a recommendation that solutions are found for all Scottish stations that lack the necessary facilities. **The FBU believe there are a substantial number of stations across Scotland where similar material breaches could be identified, and Improvement Notices issued by HSE and will work with the SFRS to resolve these issues as a matter of urgency.**

The health, safety and wellbeing of employees must be a primary concern for any organisation, however, the SFRS inherited an estate that was in large part unfit to accommodate a modern fire and rescue service. A lack of genuine investment in the SFRS has left the organisation unable to integrate changes in employment practices and legislation (dignified facilities and equalities) alongside far greater understanding of toxic contaminants within the fire and rescue service (DECON, UCLan research) leaving SFRS employees exposed to unfit working environments on stations across Scotland and unacceptable workplace risks to their health, safety and wellbeing. As has repeatedly been stated to the SCJC and Scottish Government by both the FBU and the SFRS, without multiyear, significant real terms investment, the SFRS will likely continue to fail to meet their legal obligations to protect their staff and ensure compliance with equalities and health and safety legislation.

4. **What opportunities are there for further efficiency savings and/or further investment on a 'spend to save' basis within the sector?**

Strategic Priority 3 of The Scottish Government Fire and Rescue Framework 2022 details an expectation that the SFRS will continue to explore "Modernisation and Expansion of the Firefighter Role" As has been reported to the SCJC in previous years, the FBU and the SFRS reached an agreement in principle for a developed role for Scotland's firefighters, which was delivered to the Scottish Government in November 2022. This proposal would see firefighters supporting the Scottish Ambulance Service with an emergency response to a limited categorisation of immediately life threatening emergency medical incidents on a co-responding basis, firefighters trained and equipped to respond to mass casualty events and work in the warm zone at Marauding Terrorist Attacks, and additionally work much more closely with other organisations providing assessment and support for vulnerable and at risk groups using the successful home fire safety model.

Scottish firefighters are increasingly frustrated that despite the Fire and Rescue Framework 2022 setting out an explicit expectation for the SFRS to progress this work, that three years later, and three budget cycles later, Scottish Government have failed to provide the SFRS with the required investment to realise the potential this agreement offered.

This ongoing delay and prevarication from Government, lack of real term investment, and the SFRS SDR proposals that would make permanent the cuts to firefighter numbers, close stations and reduce fire cover make it increasingly unlikely that FBU members (over 80% of Scotland's firefighters) would accept the developed role proposal at ballot.

The SFRS have previously informed the SCJC of their business case to Government for community resilience hubs, this proposal is in line with Strategic Priority 3 of the Scottish Government Fire and Rescue Framework 2022. The FBU are supportive of the principle of these hubs as the initial investment required on a "spend to save" basis would likely realise long term savings for the SFRS and the public purse.

Issues exist where other services, not necessarily within the Justice sector, do not have the same buy in or see this investment as a priority. The SFRS are currently piloting this model in Portree. The FBU are interested to see what other organisations commit to long term occupancy and sharing of this hub and the outcomes of capital monitoring of the build, and shared occupancy, and whether long term savings are realised. Overall, this investment in the SFRS estate will deliver benefits for FBU members who will operate from a purpose built, modern fire station that is compliant with current legislation and allows firefighters to manage contaminants effectively.

It is notable that during development of the Scottish Governments *Scotland's Public Service Reform Strategy — Delivering for Scotland June 2025* engagement with the FBU was not sought. The final report makes no mention of the positive benefits that could be delivered by developing the role of Scotland's firefighters and there is no mention of the business case for community resilience hubs presented to Government by the SFRS. The 2025 - 26 Programme for Government makes only a single passing mention of fire and rescue on page 38 stating; *We are also supporting the Scottish Fire and Rescue Service to modernise its service provision to meet the changing risks in communities by ensuring its resources are in the right place and are available at the right time.*

This is not the lived experience of Scotland's firefighters who have seen their Service consistently underfunded over the past twelve years, firefighter numbers decimated, hundreds of fire engines

unavailable every day due to lack of available crews, who continue to work from unsuitable stations with the associated impact on their health and wellbeing, facing increased risks due to increased response times at operational incidents and now face potentially greater financially driven cuts to their service.

5. **Any other views you have on the 2026/27 budget process which you wish to comment on?**

This FBU submission to the SCJC highlights the FBU's multiple areas of concern at the long-term underfunding of the SFRS. In preparing this submission the previous submissions made by both the FBU and the SFRS to the SCJC and the predecessor *Scottish Finance and Public Administration Committee* were reviewed.

Year on year the same points have been made by both the FBU and the SFRS, the same warnings issued and whilst the SCJC has made the case for investment in the SFRS, these warnings and the positive case for real terms investment to support the SFRS to modernise their estate, their fleet, and support a developed role for firefighters has overwhelmingly been ignored by Government.

Prior to the creation of the single service, the FBU and Scotland's firefighters were given an assurance that merging Scotland's eight legacy fire and rescue services would protect the front line. Year on year this has been proven to have been misleading with budget cuts resulting in 1239 fewer firefighters protecting Scotland today than in 2013, call handling times increasing, response times to life risk emergencies increasing and community safety engagement decreasing. Continuation on this downwards trajectory will mean Scotland's fire and rescue service will, as the then CFO stated in his evidence to the SCJC in 2023 when discussing the potential magnitude of cuts the SFRS may have to implement ***"not be able to keep communities as safe as they currently are".***

The stark reality is that the SFRS own published data proves the arguments the FBU have been making. Budget cuts have left Scotland's communities and Scotland's firefighters less safe than they were in 2013. Proposals for further modernisation, whether in recognition of incident trends or societal demographics, cannot be at the cost of further firefighter jobs, and the corresponding increased risk to communities. Scottish Government need to invest to reverse the decade of cuts to firefighter numbers now demonstrably impacting the SFRS ability to respond adequately to operational incidents.