

Agenda Supplement – Equality and Social Justice Committee

Meeting Venue:

Committee Room 3 (Senedd)

Meeting date: 30 June 2025

Meeting time: 11.00 – 15.20

For further information contact:

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Supplementary pack

Please note the documents below are in addition to those published in the main agenda pack for this meeting. In this supplementary pack Members will find:

- Consultation responses in relation to the Committee’s inquiry into post-legislative scrutiny of the Well-being of Future Generations (Wales) Act 2015
- An additional paper to note

2 Post-legislative scrutiny of the Future Generations Act: evidence session two

Please find attached the consultation responses received thus far in the Committee’s inquiry into the Post-legislative scrutiny of the Well-being of Future Generations (Wales) Act 2015. Please note that there are a number of responses yet to come in and so the outstanding responses will be published under separate cover.

Attached Documents:

SWFGA 01 Benjamin Hitchings

SWFGA 02 Lung & Asthma

SWFGA 03 Foundations for Tomorrow

SWFGA 04 National Youth Advocacy Service Cymru

SWFGA 05 Prof. Dr. Luci Attala

SWFGA 06 Platform



Senedd Cymru
Welsh Parliament

SWFGA 07 Newport City Council
SWFGA 08 Wrexham University
SWFGA 09 Royal College of General Practitioners
SWFGA 10 Future Generations Commissioner for Wales
SWFGA 11 Institute of Welsh Affairs
SWFGA 12 Nature Service Wales
SWFGA 13 Welsh Sports Association
SWFGA 14 Denbighshire County Council
SWFGA 15 Public Health Wales
SWFGA 16 Co-production Network for Wales
SWFGA 17 CWMPAS
SWFGA 18 Welsh Local Government Association
SWFGA 19 School of International Futures
SWFGA 20 Vale of Glamorgan Council
SWFGA 21 Pembrokeshire Coast National Park Authority
SWFGA 22 Conwy County Borough Council
SWFGA 23 Transport for Wales
SWFGA 24 Play Wales
SWFGA 25 Tai Pawb
SWFGA 26 Race Equality First
SWFGA 27 Natural Resources Wales
SWFGA 28 Peter Davies (an individual)
SWFGA 29 Llandough Community Council
SWFGA 30 Wales Arts Health and Wellbeing Network
SWFGA 31 Older People's Commissioner for Wales
SWFGA 32 Crisis UK
SWFGA 33 Welsh NHS Confederation
SWFGA 34 Caerphilly County Borough Council
SWFGA 35 Size of Wales
SWFGA 36 Welsh Ambulance Services University
SWFGA 37 Rewilding Britain
SWFGA 38 Care and Repair Cymru

SWFGA 39 TUC Cymru
SWFGA 40 Welsh Language Commissioner
SWFGA 41 Climate Cymru
SWFGA 43 Annie Tubadji, Swansea University
SWFGA 44 Swansea Council
SWFGA 45 Wales Council for Voluntary Action
SWFGA 46 Mudiad Meithrin
SWFGA 47 Wales Environment Link
SWFGA 48 Children in Wales
SWFGA 49 Food Policy Alliance Cymru
SWFGA 50 Sport Wales

**4.3 Correspondence to the Secretary of State from the Northern Ireland Assembly
Committee for Communities regarding the disability benefits system and the
associated Pathways to Work Green Paper**

(Pages 398 – 399)

Attached Documents:

Correspondence to the Secretary of State from the Northern Ireland Assembly
Committee for Communities regarding the disability benefits system and the
associated Pathways to Work Green Paper– 25 June 2025

Agenda Item 2

Senedd Cymru | Welsh Parliament

[Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol](#) | [Equality and Social](#)

[Justice Committee](#)

Ymateb gan: Benjamin Hitchings, Unigolyn | Evidence from: Benjamin

Hitchings, Individual

Note to the Equality and Social Justice Committee:

Attached below is a copy of my dissertation titled 'To what extent can the Well-being of Future Generations (Wales) Act 2015 be considered a success?' completed as part of a MSc (Econ) Politics and Public Policy at Cardiff University.

I hope this piece of work assessing the success of the Act can be useful to the committee's post legislative scrutiny on it. This work was completed over the Summer of 2024 so does not account for data after that.

I would like to note that the views represented here are those of myself and not of my current employer, who I was not employed by at the time of writing this.

Please do let me know if there is anything else I can help with.

Thanks

Ben Hitchings

TO WHAT EXTENT CAN THE WELL-BEING OF FUTURE GENERATIONS (WALES) ACT 2015 BE CONSIDERED A SUCCESS?

By

Benjamin Hitchings

Submitted for: MSc (Econ) Politics and Public Policy

Cardiff University

2024

Acknowledgements

I would like to thank Dr Jac Lerner for overseeing this dissertation. I would also like to thank all those who have provided me with their constant support throughout this project, and everyone who has supported me throughout my entire academic journey.

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Abstract

The Well-being of Future Generations (Wales) Act 2015 is a law that seeks to improve the quality of life for current and future generations in Wales, through requiring public bodies to do things in pursuit of economic, social, environmental, and cultural well-being. This is a significant, world leading piece of legislation whose success must be evaluated to discover whether this is an effective approach to deal with major societal issues. This has yet to be duly addressed by academia and faces a major barrier in the lack of an acceptable framework for measuring its success.

Therefore, this dissertation assesses the extent to which the WFGA has been a success, and whether the success of such a policy can be measured. It does this through highlighting different aspects that are considered to constitute success and assessing whether these aspects have achieved their intentions; how impactful the Act was on achieving these; how effective each is as a means of measuring success; and therefore, the extent to which this demonstrates success of the WFGA. Finding that an effective framework for measuring the success of the WFGA and other 'future generations policies' includes:

- Has the policy influenced the adoption of a similar policy elsewhere?
- Has the policy allowed national government and public bodies to be held to account on their actions?
- Has well-being improved?
- Has behaviour changed? – Of the national government, public bodies, and the public.

Ultimately, due to interest from other countries, and Wales's ambitions to be world leaders on this policy, the success of the WFGA must be assessed. The dissertation finds that its success can be

measured, and that success of multiple aspects can constitute overall success. Currently however, success in different aspects is largely overshadowed by many issues. Although, with more time and recommendations being acted upon, it is possible that, despite unavoidable issues, the WFGA can be considered a success.

Introduction

Since its introduction, the Well-being of Future Generations (Wales) Act 2015 (WFGA) or (the Act), has required public bodies to do things in the pursuit of the economic, social, environmental, and cultural well-being of Wales (Welsh Assembly Government, 2015a), to provide current and future generations with a good quality of life (Welsh Government 2024a). The WFGA is significant because it is a world leading piece of legislation, that places a legal obligation on public bodies to act today for a better tomorrow. It makes Wales the first country in the world to place the UN'S Sustainable Development Goals into statute through an act created to look after the interests of future generations (Howe 2022).

Due to interest in the Act from other countries; Wales' ambitions to be world leaders on this policy; to conclude that this is an effective way of improving well-being and that Wales is now being governed differently (Davidson, 2020, p.107), there is a need to effectively evaluate the extent to which it has been a success. Additionally, policy evaluation is important to provide a retrospective assessment of the merit, worth and value of the output and outcome of government interventions (Vedung,1997, p.3). However, this has yet to be duly addressed by academia and there are issues in evaluating whether the WFGA has been a success. The Act itself fails to set out an effective criteria for its success, beyond its national well-being goals, indicators, and milestones, which all possess issues. There is difficulty in measuring a complex concept such as well-being, as it has objective and subjective elements (Happy City Measurement and Policy Team 2016). There is also ambiguity of

how much actions or changes can be attributed to the influence of the Act. Additionally, assessing policy success is rarely considered beyond success as meeting policy objectives or producing better policy (Marsh and McConnell, 2010, p.565) and is often treated as a binary success or failure (McConnell, 2010, p.346). This sort of evaluation is focused on far smaller policies, and there is a large degree of difficulty in applying this approach to a policy as multidimensional, overarching, and long-term as the WFGA. The lack of an acceptable framework or methodology for measuring the success of a policy such as this poses a major challenge in evaluating the Act's success.

Ultimately, these factors, amongst others, have led to uncertainty on whether the WFGA has been successful. Therefore, this dissertation assesses the extent to which it has been a success, and whether the success of a policy such as this can be measured. It does this through exploring different aspects which are considered to constitute success of the WFGA, assessing if they have achieved their intentions; if the Act impacted this; how effective each are in measuring success; and therefore, the extent to which this demonstrates success of the Act. Ultimately creating a framework for measuring the success of this policy, which after recommendations can be directly applied to other future generations policies and in-part to long-term policies generally.

The dissertation begins with a literature review, firstly exploring traditional literature on policy success, then focusing on the success of long-term policies and the WFGA. Before exploring the topics of policy learning; well-being; and behaviour change, which are all important elements of the framework for measuring the Act's success. Then progressing on to the main body of the paper which will be divided into four chapters. The first will look at the WFGA: its background, contents, intentions, implementation and a discussion of what it says about its success. The remainder of the paper will assess whether the Act has been a success through different aspects. Firstly, applying traditional policy success literature to the Act, and particularly McConnell (2010) and Marsh and McConnell's (2010) policy success framework. Also, through others policy learning from the Act, and through holding the Welsh Government and public bodies to account to adhere to the legislation.

The dissertation will then progress to discuss the two most significant elements for measuring the Act's success, with Chapter Three focusing on success through improving well-being as the Act is centred around this. Doing so through an analytical study of the national indicators and milestones to assess whether they have improved. Also analysing the effectiveness of the seven well-being goals, which all the indicators relate to, and the role of the Future Generations Commissioner (FGC) or (the Commissioner) in improving well-being. The fourth chapter focuses on behaviour change and success through changing the behaviour of government, local bodies, and the public in line with the WFGA. This is central to the Act as improving well-being often requires a change in behaviour. The chapter undertakes document and speech analysis of Welsh Government and Senedd sources of to assess the extent of the WFGA's influence on policy decisions. Before doing the same for policy decisions of other public bodies and finding whether the behaviour of the public has changed both directly and through the impact of the highlighted policies. Finally, the dissertation will provide a framework for measuring the success of the WFGA, and other future generations policies. Success in multiple of these aspects can constitute overall success of the policy.

The dissertation ultimately argues that there is great difficulty and little value in assessing the success of the WFGA against traditional measures. Success through others policy learning and through holding government and public bodies to account are more effective means, have seen relative success, but also face issues. Additionally, well-being can be considered to have improved, and behaviour change to have occurred, yet both face issues over how much can be attributed to the Act and therefore, it is difficult to definitively state that the WFGA has been a success in these regards.

Literature Review

This literature review is separated into two sections, firstly exploring literature on policy success. This begins with a chronological overview of the academic literature on the topic, in addition to the of note McConnell (2010) and Marsh & McConnell (2010) framework for measuring policy success, and a review of the literature on measuring success of long-term policy. The second section explores literature on areas that are used to measure the success of the WFGA throughout this dissertation. Including what is said about the Act's success. But mostly focusing on policy success through policy learning; improving well-being; and behaviour change. The literature review concludes with a discussion of the methodology that is used to assess the different aspects constituting the Act's success.

In general, the literature on policy success is rather thin. McConnell's (2010) separation of the literature into six strands is effective yet can be expanded upon. Firstly, there is a large collection of literature focused on policy evaluation discussed as early as Lasswell (1956, 1971). (McConnell 2010, p.347) notes that as the concept has developed, the focus has shifted to the belief that policy success resides in good design and focusing on ex ante evaluation. The work of Boyne (2003, 2004) is significant, with a focus on linked organisations and viewing success as achieving targets and outcomes. Second, is the concept of public value, originating with (Moore 1995) in response to the American view of government as wasteful and bureaucratic. He argues for the need for things to be of value to stakeholders and operationally feasible (Moore, 1995, p.71). Third, is good practice in policymaking and management. Including the work on the benefits of policy design (Schneider and Ingram 1997), and problem definition (Bardach 2009). Fourth, is the political aspect of success, which focuses on evaluating policies based on their ability to benefit certain political actors (McConnell, 2010, p.348). Fifth, is the view of policy evaluation through success which is not common and often overly concerned with achieving goals (Nagel 2002). Some focus on mixed success (Murray and Primus 2005), and partial success (Pollack 2007), whereas the work of Bovens et al (2001) progressed

this. Finally, a substantial section of the literature focuses on failure, with some considering it objective, such as those dealing with human error (Reason 1997), whilst others addressing things such as policy fiascos (Bovens and 't Hart 1996) consider failure to be subjective. The scholars who do the latter also argue for an increased focus on success as failure is not as common as many neo-liberals claim with their rhetoric of public sector failure (Bovens et al., 2001, p.643).

In the work of (Marsh and McConnell 2010; McConnell 2010), there is an attempt to move beyond the perception that the purpose of policy analysis is about client-oriented advice and that ideal complete success is rarely met. They create a three-dimensional framework to address issues raised in the previous section and allow policy analysts to move beyond binary success and failure (McConnell, 2010, p.346). This develops from the work of (Bovens et al. 2001) which categorises policy evaluation into two dimensions. Firstly programmatic, where there is a focus on the effectiveness, efficiency, and resilience of a specific policy. Second is political, which relates to the way policies and policymakers are evaluated in the political arena (Bovens et al., 2001, pp.20-21). This is built on to introduce the third dimension of process: which refers to the stages of policymaking from an issue emerging and setting the agenda; formulating policy options; legitimising these options; to implementing the policy (McConnell, 2010, p.350). In response to the binary approach to policy evaluation, (McConnell 2010) considers policies to be able to succeed or fail along a spectrum, consisting of success, resilient success, conflicted success, precarious success, and failure. Whereby, each of the three realms of policy can succeed or fail along this spectrum. Additionally, Marsh and McConnell (2010) identify multiple indicators for each realm, which include suggested evidence and can be used to measure success. Furthermore, policy has multiple dimensions which can overlap or be treated separately, and can succeed in some ways and not others (McConnell, 2010, pp.345-349). This notion of policy success not being mutually exclusive is best demonstrated by the possible contradictions where a policy might experience process success through the government getting its policy yet be unsuccessful programmatically as it is not effective. Similarly, achieving success in one realm may mean sacrificing it in another (McConnell, 2010,

pp.357-359). The scholars note significant complexities in measuring success, including what constitutes success differing based on perspective; the failure to consider external factors when evaluating a policy's impact; and of a policy appearing successful in the short term but a failure long term (Marsh and McConnell, 2010, pp.575-581). This model is applied to the WFGA in Chapter Two of the paper, to assess the Act's success through a typical policy success framework and find how effective this model is in doing that.

A major barrier faced in attempting to evaluate the success of the WFGA, is the lack of literature on long-term policies and specifically on how to measure their success. This is largely due to the short-termism focus of policymaking, due to the pressure of immediate political and electoral concerns (Marsh and McConnell, 2010, p.576). With most policy analysis focusing on social costs and benefits (Jacobs, 2016, p.436). Elements of the literature highlight the importance of a long-term approach to policymaking, to respond to the major, social, environmental, and economic challenges we face (Department for BEIS, 2020, p.6). Boston and Stuart (2015) directly correlate this with taking a future generations focus, as they have no voice and are reliant on the current generation to protect their interests. They also note suggestions of approaches to protect future generations' interests. These include non-constitutional approaches such as: moving long-term decision rights away from elected officials, and creating legislative chambers for future generations. Additionally highlighting constitutional approaches which have seen success, that with appropriate wording can provide future generations greater moral and legal status (Boston and Stuart 2015). Despite a consensus that traditional models are not effective for measuring the success of long-term policy, there is no alternative framework. Such a means of measuring success is important to assess the extent to which progress is being made towards major long-term problems. This dissertation attempts to address this through its success framework, which can be applied to other long-term policies.

Of the little available literature addressing the success of the WFGA, there fails to be a consensus of what can be constituted as its success. The Act creates the national indicators and milestones as a

means of evaluating its progress towards the well-being goals and establishes the role of the FGC to hold public bodies to account in pursuing the goals, however each possess issues and beyond this it mentions little about its success. Former Welsh Government minister, Jane Davidson, who proposed what ultimately became the WFGA, highlights in her book #futuregen (where she tells the story of the Act), that the fundamental question of success is whether after ten years Wales will be governed differently because of it (Davidson, 2020, p.107). Other suggested aspects of success include changing the behaviour of public servants to think more long-term, which (Jones 2019) states has been a success. Additionally, Sophie Howe, as the first FGC, considers interest from other countries and governments in the policy as constituting success (Future Generations Commissioner, 2024a). The different aspects of success suggested demonstrate the complexity of measuring success for a policy such as this, which has not yet been addressed. Whereby evaluating the Act's success is important to understand whether this policy is an effective way of improving the lives of current and future generations.

One aspect of success which is explored in greater detail and included in the framework, is through others 'policy learning' from the WFGA, which the FGC believes demonstrates success (Future Generations Commissioner, 2024a). This concept has been present for centuries, and work by those such as (Bennett 1991) is built upon by Dolowitz and Marsh (1996). They consider it the process in which knowledge of policy goals; structure and content; policy instruments; institutions; ideology; ideas; attitudes; and negative lessons (Rose, 1993, pp.132-134) in one place or period, are used in the development of the same things in another place or period (Dolowitz and Marsh, 1996, p.344). With transfer occurring through forms such as copying; emulation; hybridisation; synthesis; and inspiration (Rose, 1993, pp.132-134). Paul Cairney (2019, p.207) notes the strengths of doing this and questions why actors would not want to learn from the mistakes of others. With regards to linking this to policy success, Nagel (2002, p.6) notes that if such research from elsewhere is referred to in a policy, then it constitutes good evaluation and therefore policy success. The FGC believes the Act to have been impactful through inspiring other countries and institutions (Future Generations

Commissioner 2024a, 2024b). Furthermore, this can be included as an aspect of McConnell's (2010) political dimension of policy success, where praise and the degree to which the WFGA is transferred to other institutions can be placed along the success to failure spectrum. There is a gap in the literature on others learning from your policy demonstrating its success, especially for the WFGA, which this dissertation addresses.

Well-being is at the core of the Act through making sustainable development the central organising principle of the Welsh Government and certain public bodies, which the Act defines as the process of improving the economic, social, environmental and cultural well-being of Wales (Welsh Government 2015a). The concept of well-being has deep roots, with the (World Health Organisation, 1946, p.1) constitution considering health as "the state of complete physical, mental and social well-being ... not merely the absence of disease or infirmity" The WFGA aims to improve well-being through its seven well-being goals, which have a legally binding common purpose for national and local government and public bodies, and fifty national well-being indicators against which progress towards the well-being goals can be measured (Welsh Government 2024a). Therefore, this can be considered an aspect of success, with Chapter Three assessing whether well-being has improved. However, there are issues over measuring a concept such as well-being, which must be addressed to be able to assess this. These issues are largely due to the complexity of well-being as a concept as it lacks an agreed definition, and an agreed method for measuring it (Huppert, 2017, pp.164-165). This is largely because it possesses elements which are both hedonic: feeling good which is largely subjective; and eudemonic, which is functioning well and objective (Adler and Seligman 2016). It is difficult to measure subjective experience as it is impossible to know if one person's report of feeling a certain percentage sad is the same as another person's (Happy City Measurement and Policy Team, 2016, p.4). Additionally, it is difficult to measure well-being only through objective means as well-being is more complex than just reporting facts. There is a lack of literature which looks at whether the WFGA has improved well-being, and a need to assess to assess this beyond the indicators.

Another major goal of the legislation is to change the behaviour of the Welsh Government, public bodies (Future Generations Commissioner, 2022, p.75), and the public (Davidson 2020) to best pursue the well-being goals. Chapter Four focuses on this aspect of success and the extent to which the WFGA has changed the behaviour of the Welsh Government and public bodies through influencing their policy actions, and the impact these policies and the Act directly has had on changing the behaviour of the public. Governments often use behaviour change interventions which are fundamental to address many issues facing society (Michie et al 2011). These interventions can take many forms and are characterised by (Michie et al 2011) into a 'Behaviour Change Wheel', alongside sources of behaviour and policy categories.

Policy instruments can be used for such interventions and are best illustrated by the model of *carrots*, which provide incentives (often economic); *sticks*: providing regulation (bans or mandates); and *sermons* to provide information (McCormick 1998). However, Tummers (2019) notes that these three instruments are all based on rational decision making, yet people do not always make rational decisions, often experiencing bounded rationality and choosing satisfactory options over optimal ones, which policymakers must consider when seeking to change behaviour. In response, Tummers proposes to include the instrument of the *nudge* following Thaler and Sunstein's (2008) groundbreaking book. With the *nudge* changing behaviour without major cost change, through something such as clarifying social norms (Tummers, 2019, p.926). An example of which Thaler and Sunstein (2008, p.187) highlight is of presumed consent around organ donation if there was a lack of organ donors. A policy changing behaviour can be considered a success, as it has achieved what it set out to do. The success of the WFGA in doing this has not yet been addressed, with a similar lack of literature on changing the behaviour of governments and behaviour change demonstrating policy success, which this paper rectifies.

To assess whether the WFGA has been a success the paper explores different aspects which are considered to constitute its success. First applying traditional means of measuring policy success to

the Act, analysing the interest the Act has received from elsewhere, and how effective it has been in holding government and public bodies to account through analysing the work of the FGC. In the third chapter there is an analytical study into the extent to which each of the indicators has improved (this is shown in Appendix A) and an analysis of the impact of the FGC in improving well-being. Finally, Chapter Four includes both document and speech analysis to assess the extent to which the Act has changed behaviour of Welsh Government, public bodies, and the public.

Chapter 1: The Act

This first chapter of the main body of this dissertation provides an overview of the WFGA: looking at the background to it, its intentions, its contents and implementation, and what it says about its success. The Act is ultimately about improving the social, economic, environmental, and cultural well-being of Wales. Where amid current and future challenges there is a need to think about the long-term impact of decisions (Welsh Government, 2015b, p.3-4). The Act does this through making it legally binding for public bodies to do things in pursuit of improving well-being (Welsh Government 2015a).

Background

Haydn Davies (2016) notes that the WFGA originates from the 2006 Government of Wales Act's duty to promote sustainable development, which was ultimately laid out in the One Wales: One Planet scheme. This scheme set out the intention to make sustainable development the central organising principle of governance and highlighted well-being as an indicator for this (Welsh Assembly Government 2009). Alternatively, Jane Davidson (2020), notes the Act was rooted far deeper than Davies suggests. Highlighting the significance of earlier Welsh Assembly Government schemes of: Learning to Live Differently (2000) and Starting to Live Differently (2004). She also notes the later

impact of the Wales we Want Report (Davies 2014) which highlighted seven foundations that helped influence the WFGA's final iterations (Davidson, 2020, p.85).

Intention

The Welsh Government (2024a) states that the WFGA is needed to respond to the number of challenges Wales is facing currently, and in the future. Including climate change, poverty, health and well-being, and economic activity. Whereby to tackle these large-scale issues and provide current and future generations with a good quality of life, there is a need to work collaboratively and think about the long-term impact of decisions. The Act through law, attempts to ensure public bodies do this, but also intends to change the public's actions and provide them with permission to make good decisions for the climate and have wild ideas for the future (Davidson, 2020, pp. 100-106). Davidson (2020) additionally notes the wider scope and longer-term intentions such as to shift away from an infinite growth, consumerist, and carbon reliant society towards a focus on community, kindness, and care for nature. With the Act intending to provide an overarching framework for all Welsh Government policy with sustainable development as the central organising principle.

Contents and Implementation

The WFGA outlines seven well-being goals, which are broad and overarching, show the kind of Wales we want and provide a shared vision for public bodies to work towards (Welsh Government, 2015b, p.6). The goals are: A prosperous Wales; A resilient Wales; A healthier Wales; A more equal Wales; A Wales of Cohesive communities; A Wales of vibrant culture and thriving Welsh Language; and A globally responsible Wales (Welsh Government 2015a). Additionally, sustainable development is at the core of the Act, placing it as the central organising principle of governance and being considered as the process of improving the economic, social, environmental, and cultural well-being of Wales (Welsh Government 2015a). The Act provides this common purpose to certain 'public bodies' which include the Welsh Government, the twenty-two local authorities, the seven local health boards, and other bodies including NHS Trusts, National Park Authorities, Fire and Rescue Authorities, and

Natural Resources Wales (Welsh Government 2015a). In addition to recent commitments for more organisations to come under the Act (Future Generations Commissioner, 2024c). With regards to implementation, the Act creates a well-being duty that the Welsh Government and other public bodies are expected to carry out. Where, by law, they must set well-being objectives to contribute to each of the well-being goals and take “all reasonable steps” to meet those objectives (Welsh Government 2015a). Additionally, the Act establishes a sustainable development principle, which informs organisations how to achieve their duty, where they must ensure that any actions meet the needs of the present without compromising the needs of future generations (Welsh Government 2015a). The Act also sets out five ways of working for public bodies to achieve the well-being goals: collaboration, integration, involvement, long-term, and prevention (Welsh Government 2024a).

To support and monitor public bodies in achieving their goals and to act as the guardian for the interests of future generations, the Act establishes the role of the FGC, independent from Welsh Government. The role includes functions which support and push public bodies to achieve their objectives and improve well-being, such as publishing a Future Generations Report on improvements that should be made (Welsh Government 2015a). Similarly, the Auditor General for Wales may carry out assessments of public bodies’ actions (Welsh Government, 2015b, p.8). With both aiming to hold public bodies to account in line with the goals of the Act. Also, to improve well-being at the local level, the WFGA establishes Public Services Boards (PSB), which for each local authority area includes the relevant council, health board, fire authority, and natural resources body. Each PSB must improve the well-being of its area by assessing the state of well-being, and setting objectives to contribute to the well-being goals (Welsh Government 2015a).

Success

To measure success and progress made towards the well-being goals, the WFGA establishes that Welsh Government Ministers (Ministers) must publish national indicators. These must be expressed as a value or characteristic and measured against an outcome. They also must set milestones for

certain indicators to show expectations, and must publish annual reports on progress towards these indicators (Welsh Government 2015a). Each of the fifty indicators published relate to multiple well-being goals and tell the story of progress towards them. As is explored in Chapter Three, there are multiple issues with using this to assess the legislation's success. Including, how much well-being improvement can be attributed to the influence of the Act, and the difficulty of measuring well-being. Therefore, this cannot be the only means of assessing the WFGA's success, a more developed approach assessing success through multiple aspects is required.

Chapter 2: Other Aspects of Success

This second chapter is split into two sections, the first looks at traditional measures of policy success, and applies McConnell's (2010) and Marsh and McConnell's (2010) Process, Program, and Politics policy success framework to the WFGA, analysing how effective this is for measuring its success. The second section addresses areas which have been noted by scholars to constitute success of the Act outside of the main dimensions, which are discussed in the following two chapters. Addressed here is policy learning in the form of influencing other countries to adopt similar policies (Future Generations Commissioner 2024a), and through being able to hold the Welsh Government and public bodies to account to adhere to the Act (Jones 2019; Davidson 2020).

'Typical' Policy Success

As discussed in the literature review, much of the discourse on policy success is narrow focused, and practically non-existent for long-term policies especially for one such as the WFGA. A lot of the literature due to often being produced from within government, struggles to move beyond the assumption of success as meeting objectives or making 'better' policy (Marsh and McConnell, 2010,

p.565). This includes the work of Stuart Nagel (2002) who considers policy analysis as determining which of various policies will best achieve a set of goals. Additionally, he notes key elements of policy evaluation including goals, means of achieving goals, relations between policies and goals, drawing cautious conclusions, and the ease of choosing another option. When applying this to the WFGA, the central focus on largely normative and quantitative goals does not transfer well due to the broad and hard to measure goals of the WFGA, and the complexity of the Act and the concept of well-being. A more developed approach to policy success is created by Boyne (2003) on public sector improvement. He focuses on improvement over effectiveness as it is a more dynamic concept and focuses on the delivery of success. Additionally, he explores five conceptual models for the criteria for policy success: goal model; systems-resource model; internal processes model; competing values model; and multiple constituency model. In applying this to the WFGA there are the previously noted issues over the goal focus, and a lack of relevance to the second and third models. However, the final two models provide convincing notions of the contestation of success which often reflects power relations, and different stakeholders using different success criteria. Ultimately, the lack of applicability of these measures of success to the Act, highlights the need for an alternate means of measuring success for this policy.

Process, Program, and Politics Success Framework

A more convincing model for measuring policy success is proposed by (McConnell 2010) and (Marsh and McConnell 2010). As they attempt to move beyond the binary of success or failure, conceiving policy to have three realms: process, programs, and politics, where a policy in any of these areas may succeed or fail along a spectrum. First is process where governments identify problems, examine solutions and make decisions (McConnell, 2010, p.350). Through combining the indicators and evidence provided by (Marsh and McConnell 2010) and the success-failure spectrum of (McConnell 2010), the WFGA can be considered a success in this dimension. Including over legitimacy, as the policy went through due process as evidenced by the multiple Welsh Assembly Government schemes leading to it (2000, 2004, 2009), and a lack of legislative amendments from the bill (Welsh

Government 2014) to the act (Welsh Government 2015a). In addition to success of political sustainability, demonstrated by support from the third sector, civil servants (Messham and Sheard 2020), and a degree of cross-party support as illustrated by the final vote (Senedd Business 2015). Also demonstrating innovation and influence success, through creating an innovative response to societal challenges and using other policies to shape the Act (Messham and Sheard 2020). Second, programmes are what governments do (McConnell, 2010, p.350). Where there is conflicted operational success as the FGC holds government and public bodies to account to improve well-being through a duty (Welsh Parliament 2015a). Yet it is difficult to conclude that this has been effective, and bodies are only required to take reasonable steps towards these (Davies, 2016, p.55). There is similar difficulty in answering whether it has achieved its intended outcomes, as this paper addresses, also facing the same issues over whether it was an efficient use of resources. Additionally, being unable to yet demonstrate benefit for the target group of future generations. However, it can benefit the Welsh Labour Government as they can create policy which uses the Act as a sort of mandate, despite this not being their admitted intention (Howe 2017). Third, is politics, where governments' choices have political consequences (McConnell, 2010, p.350). Here there appears to be political success as Welsh Labour won a majority in the following two elections, however it is very unlikely there is any causation between these two things. Additionally, public opinion was utilised prior to the Acts creation with the Wales We Want report (Davies 2014), however there is a lack thereof since.

Overall, in terms of applying this model to the WFGA, the Act can be considered a conflicted success. There are also still large degrees of ambiguity and wider issues in using this model to assess the Act's success. The major issue is that despite Marsh and McConnell's (2010) indicators and evidence, there is still a large degree of subjective personal interpretation required in this and in the success/failure spectrum (McConnell 2010). Additionally, this framework is ineffective as it is developed for smaller policies with fewer elements, this is made evident by a lack of a clear answer to many of the highlighted indicators of policy success.

Others Policy Learning from the WFGA

Others policy learning from the WFGA is an of note aspect of success that is highlighted by the FGC (Future Generations Commissioner, 2024a). Policy learning can generally be considered as the process where policy goals; structure and content; policy instruments; institutions; ideology; ideas; attitudes; and negative lessons in one place or period, are used in the development of the same things in another place or period (Dolowitz and Marsh, 1996, p.344). In terms of the WFGA, policy learning occurs with other countries, governments, institutions, or political actors adopting similar future generations policy because of the Act, and/or receiving external praise from the same actors. Other countries learning from the Act is underlined as an element of success by Jane Davidson (2020), and the FGC who considers the attraction of interest from other countries as offering an opportunity to make long-lasting change to current and future generations worldwide (Future Generations Commissioner 2024a). In this sense the WFGA can be considered successful as Howe (2021) notes that it has inspired the United Nations (UN). Having received recognition from the UN Secretary General (United Nations 2023). Additionally, it has influenced the establishment of a UN Special Envoy, a Futures Summit, and a UN Declaration for Future Generations. With Jayathma Wickramanayake, the UN Secretary-General's Envoy on Youth, stating they were inspired by "progress being made in some countries around the world, including Wales" (Howe 2021). Additionally, there has been interest in the future generations policies from countries such as Canada, New Zealand, Australia and Portugal (Davidson, 2020, p.22). The WFGA and the FGC have also had a direct impact on countries, where after discussion and input, Gibraltar created a Sustainable Development and Future Generations Commissioner. Also influencing Scotland who committed to a Well-being and Sustainable Development Bill (Future Generations Commissioner 2024b). The Commissioner aims to support any country to adopt similar approaches, creating a Future Generations Policy Toolkit to do this (Foundations for Tomorrow and FGC 2023). Similarly supporting others through chairing the Network of Institutions for Future Generations (NIFG), which

consists of institutions, organisations and leaders, from around the world who focus on future generations (NIFG 2024).

Overall, in this sense the WFGA can be considered a partial success. This is due to receiving praise from intragovernmental organizations and other countries, and influencing the adoption of future generations policies. Whereby success of the FGC in influencing this is also the success of the Act, as it established the role to do this. However, the extent to which this element constitutes success would be improved through explicit recognition for the influence the WFGA had on policies. Additionally, as more time passes and presuming such approaches are adopted elsewhere, there will be more examples to analyse the WFGA's influence.

Holding Government and Public Bodies to account

The WFGA's potential of being able to hold the Welsh Government and other public bodies to account is highlighted as an element of success by Jane Davidson (2020), who considers it to be an Act of the people where the public can hold government and public services to account on behalf of current and future generations. She additionally argues that the test of success will be when the Act threatens the desires of government (Davidson, 2020, p.125). This view is shared by Davies (2016, p.44) who believes that success will depend on the political will of those tasked with holding public bodies to account, yet he notes the potential issue with measuring success in this way as the well-being duty focuses on the process and not the outcome.

The significance of holding to account is demonstrated in the first sentence of the WFGA's introductory text (Welsh Government 2015a). It states that public bodies are required to do things in pursuit of the economic, social, environmental, and cultural well-being of Wales. Doing so through creating a well-being duty which the Welsh Government and other public bodies are expected to carry out through setting their own well-being objectives and taking steps to achieve them. The Act creates the independent FGC and provides it and the Auditor General for Wales with the task of helping public bodies to think about the long-term impact of their decisions (Future Generations

Commissioner 2023a) and hold them to account through the duty. The Commissioner is the core actor for doing this and publishes annual reports detailing improvements public bodies and the Welsh Government should make to best pursue the well-being goals. The FGC has had success in doing this for the Welsh Government, where following recommendations to invest in wildlife restoration and skills and training; to ensure people can access green space near their homes; and to pilot a basic income, steps have been taken by the Welsh Government to do this (Future Generations Commissioner, 2022, p.15). The FGC has had a similar impact on different public bodies who have acted upon recommendations over carbon and eco-literacy training, moving away from traditional transport planning, and a focus on wider well-being over economic prosperity (Future Generations Commissioner, 2022, p.17). Additionally, the Commissioner publishes a monthly newsletter which includes examples of where it has held government and public bodies to account. Recent examples include calls for the Welsh Government to set a robust plan for growing a seaweed industry in Wales (Future Generations Commissioner 2024c) and to create a national food strategy for Wales (Future Generations Commissioner 2024d). The Auditor General also aims to hold both to account. This is demonstrated through their 2020 report where they highlight what public bodies need to do to achieve their well-being objectives. Additionally stating that the Welsh Government needs to itself “get it right” to help other public bodies (Auditor General Wales, 2020, p.14).

Ultimately, in this sense the WFGA can be considered a somewhat success, as the Welsh Government and public bodies have been held to account in line with the Act, mostly by the FGC. Which constitutes success of the Act as it established the Commissioner for this purpose. However, there is difficulty in being able to measure how much government and public bodies have been held to account, with large degrees of personal interpretation and subjectivity required. Similarly, there is little opportunity for the public to directly hold these actors to account. Whereby if a means was created which allowed this, and if after more time there were more examples of holding to account available, then this would be stronger aspect of success. The purpose of holding to account is to improve well-being, which is often achieved through changing behaviour, both of which are explored

as the major elements of the Act's success in the following two chapters. This highlights the complexity of measuring success and how many of its aspects overlap.

Chapter 3 – Improving Well-being

The WFGA is entirely centred around the concept of well-being, with its core purpose to improve “the social, economic, environmental, and cultural well-being of Wales” (Welsh Government 2024a). The Act states that Ministers must set indicators to measure progress made towards the well-being goals (Welsh Government 2015a). This demonstrates the importance of this in assessing the success of the WFGA and other future generations policies, however there are issues with measuring well-being that must be addressed. This chapter firstly explores well-being as a concept, before discussing the findings of an analytical study this dissertation has undertaken to assess the Act's success in this sense. It analyses well-being improvement through the fifty national indicators, national milestones, and seven well-being goals that the Act sets out. Finally, analysing the impact of the FGC in improving well-being.

Well-being as a Concept

A clear and agreed definition of well-being remains elusive due to different academic disciplines defining it in several ways (Jarden and Roache 2023). However, a notable definition, and one useful here, considers it “how people feel and how they function both on a personal and social level, and how they can evaluate their lives as a whole” (Michaelson et al, 2012, p. 6). This is effective as it demonstrates the complexity of well-being possessing multiple dimensions. Alder and Seligman (2016) explore this notion, noting that well-being consists of elements which are both hedonic which is subjective and based on how people evaluate their lives, and eudemonic which is objective and often externally measured through quantitative means. Furthermore, different aspects to well-being also include social, physical and psychological (Happy City Measurement and Policy Team, 2016, p.4).

Similarly, the OECD (2024) Better Life Index considers there to be eleven topics essential to quality of life and well-being. Consisting of housing, income, jobs, community, education, environment, governance, health, life satisfaction, safety, and work-life balance.

Well-being is at the core of the WFGA. It makes sustainable development the central organising principle of the Welsh Government and certain public bodies, which the Act defines as the process of improving economic, social, environmental and cultural well-being (Welsh Government 2015a). The legislation treats well-being as a more rounded concept than others have previously, moving beyond a personal approach to include both the individual and all of society including nature and culture.

Also believing that each of the four dimensions of well-being should be considered with equal weight and focused on to the same degree (Davidson, 2020, p.11). Furthermore, the Act directly correlates sustainable development with improvements in well-being, this contrasts with much of the literature who consider the two global policy priorities to be invariably isolated (O'Mahony 2022) and not always positively correlated with one another (De Neve and Sachs 2020). The WFGA (Welsh Government 2024a) aims to improve well-being through the shared vision of its seven well-being goals, placing a well-being duty on public bodies which include the Welsh Government and local authorities. It requires them to set well-being objectives to help pursue the well-being goals.

Improving well-being is a key aspect of the WFGA's success and therefore must be measured to find whether the Act has overall been a success. However, there are issues faced in measuring well-being, largely due to the complexity of well-being, without an agreed definition, nor framework for measuring it (Huppert, 2017, pp.164-165). First, there are issues over measuring hedonic well-being as you are unable to compare two different people's subjective experiences, whereby if someone states they feel a certain percentage sad and another says the same, there is no way of knowing whether the two experiences are identical (Happy City Measurement and Policy Team, 2016, p.4). This is an issue with the (Office for National Statistics, 2024a,2024b) UK Measures of National Well-being which attempts to measure well-being through these subjective means. Secondly, there are

also issues with eudemonic well-being as it and aspects of it are more complex than just objectively reporting facts. This is also an issue with the (Office for National Statistics 2024b) measures.

Therefore, when there are improvements in well-being, these issues must be considered.

Fifty National Well-being Indicators

As a means of measuring progress made towards the seven well-being goals and therefore improvement in well-being, the WFGA requires Ministers to set national well-being indicators (Welsh Government 2024a). The Act states that an indicator must be expressed as a “value or characteristic that can be measured quantitatively or qualitatively against a particular outcome”; may be measured over a period Ministers consider appropriate; and may be measurable in relation to Wales or any part of Wales (Welsh Government 2015a). The indicators were set in 2016 after widespread public consultation on what indicators would best measure progress against the well-being goals. Then in 2021 after further consultation and learning from the COVID-19 pandemic, some indicators were updated, and four new ones were added (Welsh Government 2023a). There is a significant breadth in the areas the indicators address, from the percentage of people in income poverty, people’s mean mental well-being score, the number of Welsh speakers, and the area of healthy ecosystems (Welsh Government 2024b). This demonstrates the widespread approach to well-being taken by the Act (Welsh Government 2015a). Similarly, each indicator corresponds to at least two of the seven well-being goals, with a milestone set for sixteen of the indicators to illustrate expectations of what they should show at a certain point (Welsh Government 2024a). The Welsh Government also produces annual reports on the progress being made towards achieving the well-being goals, where they use improvements in indicators as the means of measurement. This highlights how the indicators are considered by the Welsh Government as the means of measuring improvements in well-being and success of the Act. Therefore, the remainder of this section will assess the extent to which these indicators have improved and that this is an effective means of measuring the Act’s success.

To achieve this, the dissertation has undertaken an analytical study into the indicators as shown in (Appendix A) through utilising (Welsh Government 2024b) data. (Appendix A) first highlights each of the fifty indicators on the range of topics, then notes which of the seven well-being goals each indicator relates to, and which include a milestone (Welsh Government 2024a). The most significant aspect of the study is explored in the next three paragraphs through discussions of: the type of well-being related to the indicator, hedonic or eudemonic; whether the indicator is measurable quantitatively or qualitatively; and whether the indicator has improved.

Firstly, as noted by Adler and Seligman (2016), well-being integrates hedonia, and eudemonia. This study applies these elements of well-being, which are often considered through personal dimensions (Ryan and Deci 2001) to the wider realms that the Act uniquely addresses. It applies them to the indicators which address economic, social, environmental, and cultural well-being. As demonstrated in (Appendix A), most of the indicators relate to eudemonic well-being. These notably include different dimensions of well-being such as the individual healthy life expectancy, societal measures such as Wales' Gross Value Added, and environmental measures such as country-wide greenhouse gas emissions. All of which are measured objectively and quantitatively. Whereas the indicators which also possess hedonic well-being, of which there are fewer, are concerned with areas such as feeling involved, safe, satisfied, a sense of community, and mental well-being and loneliness. Each of these relate to the individual's subjective well-being, which possesses issues as well-being is difficult to measure in this way and fails to capture the complexity of philosophical conceptions surrounding the concept (Adler and Seligman, 2016, p.5).

Second, as previously stated, each of the indicators can be measured quantitatively or qualitatively against a particular outcome (Welsh Government 2015a). (Appendix A) illustrates which indicators can be measured in what way, whereby in practice each have been provided a quantitative means of measuring improvement. However, despite many indicators being able to be measured quantitatively such as the percentage of people in work or air quality, a small percentage of them are more

complex. There is therefore difficulty in measuring these with only a numerical score or a binary response that could be overcome through also measuring through qualitative means. For example, over indicators concerned with feeling certain ways and of complex concepts such as mental well-being and loneliness. This illustrates the complexity of well-being and of measuring it. Furthermore, there is a direct correlation between qualitatively measurable indicators and hedonic well-being, as they are concerned with individual feeling. In addition to quantitatively measurable indicators and eudemonic well-being. The indicators as a mode of measuring well-being improvement would be strengthened if qualitative and quantitative means were combined in assessing improvements.

Thirdly, utilising the data from (Welsh Government 2024b) the study assesses whether each indicator has improved since the Act became law in 2015 (see Appendix A). Overall, out of the fifty indicators, twenty-five have improved, which is exactly half. Major improvements have occurred in both hedonic and eudemonic indicators concerned with the individual, including Gross Disposable Household Income per head, the percentage of people feeling able to influence decisions in their area, the percentage of people feeling lonely, the percentage of people participating in multiple sporting activities. In addition to improvements in environmental indicators of levels of Nitrogen Dioxide and greenhouse gas emissions. Fourteen indicators have not improved, of which nine have worsened and five have remained constant. The COVID-19 pandemic is blamed for a decrease in children developing the right skills, school leavers with skills and qualifications, and the percentage of innovation active businesses (Welsh Government 2024b). For the remaining indicators, it is not possible to conclude whether they have improved as some lack recent data (indicators 13 and 44), don't have data that goes far back enough (indicators 19 and 33), or are newly added (indicators 46,47,48,50). Excluding other factors and treating each indicator equally as the Act requires, the WFGA can be considered a success as a half of the indicators have improved, some significantly, and only nine out of the fifty have worsened.

However, there are multiple issues with measuring well-being improvement through this way. The most prominent is the extent to which improvement of indicators can be attributed to the impact of the Act. Whereby even if an indicator improved and was stated to have because of the WFGA, there would still be issues in being able to demonstrate such causation. This is due to the constant multitude of external factors which impact the indicators and there being no way to measure the Act's impact in this sense. The 2023 Wellbeing of Wales Report highlights the impact of the external factors of covid-19, the war in Ukraine, and the cost-of-living crisis as having a dominant effect on data (Welsh Government 2023a). Furthermore, there are issues surrounding the data for some indicators, such as a lack of data for recent years (e.g. indicators 13 and 31) or being unable to compare different types of study (e.g. indicators 32 and 33). In addition to issues surrounding measuring indicators with qualitative elements only through quantitative means.

Overall, there is some value in measuring well-being through these indicators. However, this is largely overshadowed by the highlighted issues, particularly how much can be attributed to the Act. Additionally, the indicators as a way of measuring improvement in well-being would be improved with more consistent and comparable data and by being measured through a combination of both quantitative and qualitative means, which should've begun when the indicators were published. This could be overcome in a future study which assesses the indicators in this way, whereby after more time, increased data on the indicators would also be available.

National Milestones

Furthermore, to show expectations of what indicators should be showing at certain points and to assist in measuring progress towards the well-being goals, the WFGA states that Ministers must set national milestones in relation to certain indicators. In setting a milestone, Ministers "must specify the criteria for determining whether the milestone has been achieved", and the time by which it is to be achieved (Welsh Government 2015a). After consultation, the first set of national milestones were published in December 2021, before the remainder were the following year (Welsh Government

2023a). Skeels (2022) highlights the importance of the milestones, to set a clear, realistic target and enable progress against it to be measured over time.

As demonstrated in (Appendix A), sixteen of the fifty indicators have a milestone attached to them, which sets a long-term target of improvement until 2050. They address areas concerned with each of the Act's four dimensions of well-being and seven well-being goals, with milestones including narrowing the gap in life expectancy between least and most deprived, increasing the percentage of adults with a level three qualification, reaching one million Welsh speakers, and achieving net-zero emissions. These milestones have been deliberately created as they align with the international milestones of the UN Sustainable Development Goals (Skeels 2022). Through an analysis of improvements of indicators with a milestone attached (Appendix A), the study finds that nine out of the sixteen indicators have seen improvement towards reaching their milestone. Including progress towards 99% of children having two or more healthy lifestyle behaviours, eradicating the gap between employment rate, and increasing the percentage of people who volunteer. With only three having worsened. It is unclear why more and ultimately all indicators don't have a milestone as it would make measuring improvement easier and provide greater incentive. This is also significant as all indicators should be treated with equal attention as each of the four dimensions of well-being are supposedly considered equal (Davidson, 2020, p.11). Similarly, the milestones could be improved through all having quantitative targets where possible (such as indicators, 10, 14, and 18), moving beyond 'improving' and 'reducing' (Welsh Government 2024b). They can also be improved by measuring improvement in indicators through both qualitative and quantitative means.

In this sense, well-being can be considered to have improved and the WFGA can be considered a success, since over half the milestones have improved and only three have worsened. However, there are still the underlying issues of knowing the extent of the Act's impact with external factors influencing indicators. The milestones as a means of measuring well-being improvement would be

improved through providing more milestones with quantitative targets and assessing progress both quantitatively and qualitatively.

Seven Well-being Goals

The WFGA outlines seven well-being goals which are at the core of the legislation. They show the kind of Wales we want and provide a shared vision to work towards (Welsh Government, 2015b, p.6). The goals are provided with a legally binding common purpose to ensure that public bodies work to achieve these goals (Welsh Government 2024a). This is through placing a well-being duty on public bodies to pursue objectives that are designed to achieve the well-being goals (Welsh Government 2015b). The goals are, A prosperous Wales; A resilient Wales; A healthier Wales; A more equal Wales; A Wales of cohesive communities; A Wales of vibrant culture and thriving Welsh language; and A globally responsible Wales (Welsh Government 2015a). The goals stretch across multiple areas and are vital to ensure current and future generations are given a good quality of life (Welsh Government, 2015b, pp. 4-6).

The Act publishes the indicators to measure progress towards achieving these goals (Welsh Government 2015a). Almost all fifty indicators relate to a minimum of three of the well-being goals, with many addressing more (Appendix A). As previously noted, and demonstrated in (Appendix A), there have been improvements in exactly half of the indicators, and only nine have worsened. As the indicators that have improved relate to all the different well-being goals, it can be considered in this sense that well-being has improved.

However, the purpose of the well-being goals is not to measure well-being improvement against, as the Act creates the indicators and milestones to do this. Their core purpose is to show the shared aspirational vision for improving well-being, and act as the foundation for improving well-being.

Whereby, the Act's means of enforcing the policy and measuring its impact are all based on these goals.

Future Generations Commissioner Improving Well-being

The WFGA establishes the role of the FGC, independent from Welsh Government, to act as “a guardian for the interests of future generations”, to support and monitor public bodies and PSB’s pursual of the well-being goals and to encourage them to think about the long-term (Welsh Government 2015b). The FGC aims to improve well-being through assisting public bodies in setting and working towards their well-being objectives, and through producing recommendations for how well-being can be improved (Welsh Government 2015b).

One way the Commissioner aims to improve well-being is through the publication of Future Generations Reports, which the WFGA requires to be published a year before a Senedd election. The report must include an assessment of how public bodies should improve the chances for future generations to meet their needs and take greater account for the long-term impact of their actions; and must consult each public body and several other actors (Welsh Government 2015a). The inaugural (Future Generations Commissioner 2020a) report was considered the culmination of five years of engagement and research, and an assessment of the progress of the Act so far. It considered there to have been mixed progress from public bodies towards the well-being goals and improving well-being. The success is demonstrated by the ‘Simple Changes’ public bodies had made in working towards the goals. In comparison to the issue of many public bodies not understanding the definitions of the goals when setting their objectives (Future Generations Commissioner, 2020b, pp.26-28).

The FGC also produces annual reports detailing an overview of the work they have done in pursuit of improving well-being. They state to have influenced the Welsh Government on a ninety-million-pound housing innovation grant (Future Generations Commissioner, 2018, p.24); provided evidence and intervention that was crucial in the decision not to build the M4 relief road (Future Generations Commissioner, 2019, pp.15-16); secured an increase in Welsh Government funding towards tackling the climate emergency (Future Generations Commissioner, 2020c); and influenced the Welsh

Government on their commitment to a basic income pilot (Future Generations Commissioner, 2022, p.49). This illustrates the effective impact the Commissioner has had in influencing decisions that improve well-being.

A large aspect of the role of the Commissioner, as explored in the previous chapter, is to hold government and public bodies to account to improve the well-being of current and future generations. The 2020 Future Generations Report highlights how the development of a budget improvement plan, and the decision against the M4 relief road were done “as a result of recommendations from my (the Commissioner’s) monitoring and assessment in 2019” (Future Generations Commissioner, 2020b, p.18). Similarly, the FGC’s pursuit of improving well-being is often delivered through changing the behaviour of government and local bodies, which is fully explored as a major aspect of success in the following chapter. The report highlighted the partial success in changing the internal culture and leadership of public bodies (Future Generations Commissioner, 2020b, pp.7-13). The success of the Welsh Government in terms of innovation is also highlighted, with the new school curriculum and innovative housing. However there had been issues in implementation and the gap between aspiration and delivery demonstrating a lack of long-term vision for the kind of government needed for the future (Future Generations Commissioner, 2020b, pp.18-24). This ultimately demonstrates the overlapping nature of the different aspects of success, which underlines the complexity of measuring success.

In sum, the FGC appears to have been effective in improving well-being. This is demonstrated by the highlighted instances where the Commissioner has impacted decisions, particularly those of the Welsh Government. This is additionally shown through the FGC’s support for public bodies and PSBs in setting and working towards their well-being objectives, where improvements in these objectives could constitute policy success. If one assumes that the Commissioner has improved well-being, this can be considered success of the Act as it established the role to do this (Welsh Government 2015a). However, there are issues in assuming this, whereby it is difficult to be certain that the FGC has

impacted Welsh Government decisions, without such an explicit statement and the presence other factors such as financial and legislative constraints. Similarly, there is a lack of data on whether well-being objectives have been achieved and bodies are only required to take reasonable steps in pursuit, rather than achieve them (Davies, 2016, p.55). Additionally, the FGC largely fails to have an effective means of measuring its own impact, demonstrated by the previous Commissioner's ambiguous strategic performance measures (Future Generations Commissioner, 2018, p. 6), and by the (Public Accounts and Public Administration Committee 2024) critique of the new Commissioner's lack of success measures in their 2023 annual report.

Conclusion

To a degree, well-being can be considered to have improved, (as shown by Appendix A) with half of the fifty national indicators and over half of the milestones improving. This is also demonstrated through the FGC impacting Welsh Government decisions and supporting public bodies and PSB's pursual of the well-being goals. However, the major underlying issue in measuring well-being improvement is the extent to which it can be attributed to the Act. Similarly, over how much the FGC truly has impacted Welsh Government decisions. Both could be in-part overcome with explicit statements of impact and through future study after more time has passed. Additionally, the previously noted issue of measuring the complex concept of well-being, is still present, with both its hedonic dimension where you are unable to compare two people's subjective experiences, and its eudemonic dimension where it is difficult to measure well-being through only quantitative means. Acknowledging these issues is vital, as well-being improvement is a key aspect in assessing whether the WFGA has been a success, as the Act is centred around improving well-being. In this sense, there is difficulty in considering the Act to have been an explicit success as any well-being improvements are overshadowed by the highlighted issues.

Another major goal of the WFGA is to change behaviour. This is complex, takes time and “is a real organisational and human challenge” (Future Generations Commissioner, 2019, p.10). The Act aims to change the behaviour of both the Welsh Government and public bodies (Future Generations Commissioner, 2022) through influencing their policy actions, and the public (Davidson, 2020) both through the impact of such policies and directly. This highlights the significance of this as an aspect of the WFGA’s success, whereby successful behaviour change correlates with success of the Act. The chapter first explores an overview of behaviour change, looking at how policy can change behaviour, examples of the Welsh Government previously doing this, and changing behaviour as constituting success. Before the main section where there is a document and speech analysis of relevant Senedd and Welsh Government sources to assess the extent to which the Act has changed the behaviour of the Welsh Government. Additionally assessing how much the Act has impacted the policy actions of other public bodies and caused behaviour change in the public.

Behaviour Change as a Concept

To tackle problems that societies face, ranging from unemployment to poor health, governments are often required to change the behaviour of the public through policy. With behaviour change interventions being fundamental to addressing such issues (Michie et al 2011, p.1). These interventions can take many forms and are characterised by (Michie et al 2011) into a ‘Behaviour Change Wheel’. However, a more useful and simpler model is proposed by (Tummers 2019) of the policy instruments of *carrots*, *sticks*, *sermons* and the *nudge* which respectively provide incentives, regulation, information, and a nudge to try and change people’s behaviour. This model is utilised in this chapter to illustrate where the Welsh Government have used such instruments and whether the WFGA has caused behaviour change in these ways.

As with any government, the Welsh Government have previously sought to change behaviour through policy. Examples which include preventative approaches to improve public health, and reduce environmental harm are explored here. Firstly, was the introduction of the 2007 smoking ban

which utilised the whip instrument by making it illegal to smoke indoors to “protect people from the harmful effects of second-hand smoke” (Watkins 2021) and to change the behaviour of smokers. Second was the introduction of minimum pricing for alcohol to reduce alcohol consumption of ‘hazardous’ drinkers, improve health, and reduce costly alcohol related hospital admissions (Evans 2022), through a nudge. Both policies saw success through a reduction in the number of smokers (Office for National Statistics 2023), and the alcohol consumption of heavy drinkers (Evans 2022). Additionally, in 2010 a charge on single-use carrier bags was introduced to change public behaviour through utilising a carrot by providing a financial incentive. This also successfully changed behaviour (Poortinga et al., 2013). The WFGA seeking to change behaviour differs from these traditional examples, in the sense that it aims to change not only the behaviour of the public but also of public bodies and the government itself.

Within the text of the WFGA (Welsh Government 2015a), there is no explicit mention of the Act changing behaviour, however it is central to the requirement of public bodies to carry out sustainable development. Whereby they must pursue well-being objectives in line with the well-being goals, which requires a change in behaviour. Additionally, the Commissioner considers “bringing change to people’s lives and changing behaviours” (Future Generations Commissioner, 2019, p.10) as key for the Act. Achieving this for different groups is considered an important intention such as to change the culture of public servants to think more long term (Jones 2019); and of the Welsh Government, where (Davidson, 2020, p.107) considers a test of the Act being if in ten years, Wales is governed differently because of it. A large degree of this change is through legislation, which the Act seeks to influence as this is considered effective to change behaviour of the public (Davidson, 2020, p.89). In addition to the impact such policies have on people, the Act also aims to directly impact the public through making it easier to make good decisions and providing them with permission to have wild ideas for how to tackle major issues (Davidson, 2020, pp.100-106). Therefore, the Act successfully changing behaviour can be considered a form of success, and it is important to assess whether the Act has done this to conclude whether the WFGA has been a success.

Impacting Policy Decisions and Actions of Welsh Government

The most important actor for the WFGA to change the behaviour of is the Welsh Government, as the Act intends to provide an overarching framework for all its policy decisions (Davidson 2020). This is also due to the importance of policy in changing behaviour, and to be able to achieve the aspirational goals of the Act, the Welsh Government needs to lead by example (Future Generations Commissioner 2020b, p.15). The extent to which behaviour has changed can be seen through the impact the Act has on the government's policy decisions. This can be demonstrated in legislation, other policy documents, chamber speeches, committee discussions etc. It is important to recognise the distinction between a policy referencing the WFGA where it acts as a tick box over which (Howe 2017) raises concern, compared to a policy being influenced and shaped by it, which constitutes true success. As it is not possible to assess whether the Act influences every policy, this section aims to assess a general idea of its impact. Firstly, through analysing policies which the Act has been considered to have impacted to assess the extent to which it influenced their outcomes, and then an assessment of the WFGA's influence on Welsh Government policy in general.

Firstly, the most renowned example of the WFGA impacting a policy decision was the decision against building the M4 relief road. This is significant due to the long-term attention on the issue and this proposed solution; the cost already spent on it; and the supposed impact the WFGA had on the outcome. The FGC believes that the Act and their office impacted the decision, considering the relief road "not being fit for future generations" (Future Generations Commissioner, 2019, pp.15-16). This view was supported by Mark Drakeford, who scrapped the plans, stating in his final speech as First Minister that the policy was "not in the long-term interests of Wales" (Drakeford, 2024). Additionally, he noted at the time the impact the climate emergency and Net Zero targets had on this decision (Drakeford 2019a), which could demonstrate partial influence of the WFGA. However, in his official decision statement he evidently considered the WFGA, believing that not building the road did not breach his duties in line with the Act (Drakeford, 2019b, p.8). However, this was not the only influence on the decision, with (Drakeford 2019a) also highlighting the factors of austerity and Brexit.

The policy's influence is also questioned by the First Minister challenging the Commissioner's recommendations on the ground that development proposals don't need to satisfy all well-being goals (Drakeford 2019a). The WFGA can be considered to have helped impact the decision, but there was ultimately a combination of factors that led to the decision. The notion that the Act impacted the outcome would be supported if a direct alternative policy was taken or as Howe (2020) argues, the funding was invested in future generations causes.

The second notable policy is the Curriculum for Wales, which became law in 2021. This is significant because it is a major change from the previous curriculum and was supposedly influenced by the WFGA. The (Future Generations Commissioner 2024e) proposes that the Act influenced this policy, stating that it is purpose driven and embodies a long-term approach with future generations at its core. Also noting that the curriculum was designed to align with the WFGA, with it treating creativity, digital skills, and problem solving with high importance which demonstrates a long-term view as these are skills that will be needed in the future (Future Generations Commissioner, 2021a, p.52). The impact the WFGA had on the curriculum is illustrated in the curriculum guidance, through the encouragement of schools to seek to contribute to the well-being goals and adopt the five ways of working (Education Wales, 2020, p.19). Similarly, part 1 of the Curriculum and Assessment Act sets out four purposes of the curriculum to enable children to develop as: ambitious, capable learners; enterprising, creative contributors; ethical, informed citizens; and healthy, confident individuals (Welsh Government 2021a). Whereby centring education on these aims "is critical" in pursuing the well-being goals of the WFGA (Education Wales 2024). Furthermore, former Education Minister Kirsty (Williams 2020), stated in the Senedd education committee that she considers the curriculum to have been designed to best maximise its contribution to all the well-being goals and being central to improving the social, economic, environmental, and cultural well-being of Wales. The WFGA can be considered to have influenced this policy as demonstrated by its four purposes, the encouragement of schools to contribute to the well-being goals, and a rather explicit statement on influence from the minister at the forefront of the policy.

Third, is the changing of the speed limit on restricted roads to twenty miles per hour. This is notable due to the major public attention and opposition this policy received. The FGC considers the policy to adhere to the WFGA's requirements of utilising preventative means to protect well-being now and in the future (Walker 2024). The WFGA appears to have influenced the speed limit reduction, as the (Welsh Government 2022) consultation considered the policy to have the potential for significant positive effects on the health of the population, and to deliver on all seven well-being goals. Similarly, this is supported by the former Deputy Climate Change Minister who stated there is a need to look at the long term, not just the short, as the WFGA tells us to do (Waters 2023a). He states that this is a very good example of this and acting in line with the WFGA (Waters 2023b). The introduction of this policy aligns with the goals of the WFGA, and it is plausible that it considered the Act. However, it is unclear how much the WFGA influenced the policy, which questions the extent to which it changed the government's behaviour.

Of the ten acts that have so far been passed by this current Senedd, only half contain reference to the WFGA in their legislation's text, and some only minorly. This demonstrates that the WFGA has not necessarily influenced all Welsh Government policies, despite the Act's intention to act as the overarching framework for all policy decisions (Davidson 2020). However, this does not mean that there has not been success in changing behaviour, as the Act has also influenced multiple policy areas as demonstrated through recent strategy documents. For example, on health, the WFGA is considered in the 'Healthier Wales' ten-year national health plan, which maps out how the proposed system contributes to the well-being goals and makes many references to the consideration of future generations, improving different aspects of well-being, and achieving a more equal Wales (Welsh Government 2021b). Similarly, on waste, the Act is considered "at the heart of the development" of the 'Beyond Recycling' document, where they have produced a strategy which looks to maximise contribution to the well-being goals (Welsh Government 2021c). Also, on transport in the 'Llwybr Newydd' transport strategy, the impact of the WFGA is demonstrated by the plan adopting the five ways of working and setting out well-being ambitions to contribute to the well-being goals (Welsh

Government 2021d). The WFGA impacting these key policy documents highlights the Act's influence in changing behaviour as these long-term plans are now guided by this legislation.

This section has demonstrated that the WFGA can and has changed the behaviour of the Welsh Government through specific policies, with the notable influence of the Act on the curriculum, the M4 relief road decision, and the highlighted policy documents. In this regard the Act can therefore be considered a relative success. However, it is difficult to understand the true impact it has had, as not all policy decisions reference it, this could be overcome through an outright statement on its influence. An alternative notion may be that the Act has changed the behaviour of the government through changing the culture of policymaking more generally. Which was one of Davidson's (2020) intentions, yet this is difficult to measure or illustrate.

Impacting Policy Decisions and Actions of Other Public Bodies

Changing the behaviour of other public bodies included in the WFGA is also a core intention of it. It aims to make public bodies think more long term, and act to pursue well-being objectives in line with the well-being goals and sustainable development (Welsh Government 2024a), which requires behaviour change. Whereby a change in behaviour can be demonstrated through progress towards these objectives and having an impact on policy decisions. This subsection looks at the FGC's assessment of public bodies' through both these means. Before assessing policy decisions of public bodies and the extent to which the WFGA has impacted these and changed their behaviour.

Firstly, a major duty of the FGC is to monitor and assess the extent to which public bodies' well-being objectives are being met (Welsh Government 2015a). The Commissioner considers there to have been mixed success over this since despite progress towards objectives in some areas, most bodies have failed to attempt to contribute to the goals; the quality of objectives and steps to meet them did not meet the aspirations of the WFGA; and more progress is required for change (Future Generations Commissioner, 2020c, pp.54-55). Additionally, there has been limited assessment and data on progress towards objectives, as bodies are only required to take reasonable steps in pursuit

(Davies, 2016, p.55). This makes it difficult to utilise this as an aspect of behaviour change, which could be overcome through more pressure on bodies to meet objectives and greater assessment of their progress. Secondly, the Future Generations Report highlights the success in part of changing the internal culture and leadership of public bodies to think about innovation, implementation, more integrated, and consider the long-term (Future Generations Commissioner, 2020b, pp.7-13).

Additionally, the Commissioner explicitly notes the change in behaviour over things such as active travel and electric fleets (Future Generations Commissioner 2020c), and in bodies including different health boards, councils and TFW (Future Generations Commissioner, 2019, 2021a, 2022). However, it is not possible to categorise all public bodies as having changed their behaviour.

Additionally, there are notable examples, many of which the FGC highlight, of instances where public bodies have changed behaviour due to the WFGA. First is the Cardiff Council's joined up approach to achieve its well-being objective of growing in a resilient way, and addressed the city's major challenges of air pollution, congestion, and obesity through promoting active travel. Changes include projects such as: 'Greener Grangetown' which improved cycle-footpaths and targeted active travel at unhealthiest communities; changes to Cardiff Castle Street; and pedestrianising primary school areas (Future Generations Commissioner 2021b). Through this Cardiff Council can be considered to have successfully changed their behaviour to pursue their objective and improve lives of residents. With active travel specialist, Chris Roberts, considering them to have "fully embraced the aims of the WFGA" (Future Generations Commissioner, 2021b, p.8). Second, the Cardiff and Vale UHB has changed its behaviour through adopting a joined-up approach to increase biodiversity, address the climate crisis, and improve the well-being of their staff and patients. Examples of this include the creation of the 'Health Meadow', a green space for well-being; the critical care unit's tree planting scheme; an increased approach to sustainable healthcare; and increasing green spaces across the health board (Future Generations Commissioner, 2021c). This joined-up approach tackling different areas of well-being exemplifies behaviour change and demonstrates the impact of the WFGA. This has also been demonstrated by 'Climate Ready Gwent', a collection of public bodies, and PSBs which

is overseen by Natural Resources Wales. They delivered carbon literacy training to over two hundred people. They also established the Blaenau Gwent Climate Assembly, where members vote on recommendations for what organisations, communities and individuals should do to tackle the climate crisis (Future Generations Commissioner 2021d). This is an example of multiple public bodies coming together and changing their behaviour. However, beyond the climate crisis, it fails to address other areas of the WFGA, which questions how much it was impacted by the Act.

This section has illustrated that public bodies have changed behaviour and have been impacted by the WFGA, however likely not as much as the Act or the Commissioner would have aspired for. Whereby there has been limited and unknown progress towards objectives. However, behaviour change has been demonstrated through the policy examples highlighted. In this sense, the Act can be considered in-part a success. This as an aspect of success could be improved in a future study after there is more pressure put on bodies to pursue objectives, more examples of behaviour change, and explicit statements of the WFGA's influence on public bodies' actions.

Impacting Change in the Behaviour of the Public

The WFGA also intends to change the behaviour of the public, with Davidson considering a key measure of success being whether the WFGA will inspire new and different actions in Welsh communities (Davidson, 2020, p.107). Behaviour change in the public can be sought through two dimensions. Firstly, as explored in the previous two sections, through changing the behaviour of the Welsh Government and public bodies, to create policy which seeks to change public behaviour in line with the Act. Secondly, through the Act directly changing the public's behaviour. This section will assess the extent to which the WFGA has influenced change in the public's behaviour through both means.

Firstly, of the highlighted Welsh Government policies, the twenty miles per hour policy demonstrates a significant attempt to change the behaviour of the public. The policy aims to change behaviour through a nudge which intends to decrease the speed of cars to reduce the risk of collisions and

severe injury; promote active travel by encouraging walking and cycling over driving; improve safety of residents; and improve health and well-being (Welsh Government 2022). Since the introduction of the policy, there has been a significant decrease in the number of serious casualties on twenty and thirty miles per hour roads (Stats Wales 2024). Whereby if one assumes this was influenced by the WFGA, then the Act has successfully changed public behaviour through this policy. Similarly, the cancellation of the M4 relief road and the wider Welsh Government transport approach as detailed in Llwybr Newydd (Welsh Government 2021d), highlights a focus on sustainable transport and active travel. Seeking to change the public's transport habits through a modal shift, and the nudge instrument. Setting an aim of forty-five per cent of journeys to be made by public transport, cycling or walking by 2040 (Welsh Government, 2021d, p.48). It cannot yet be concluded whether behaviour in this regard has changed. Additionally, of the previously explored examples of public bodies changing their behaviour, many have also sought to change the public's behaviour. For example, the Cardiff Council's sought to "create long-term behavioural change" for children and young people through promoting active travel as habitual practice (Future Generations, 2021b, p.6). They also targeted active travel at communities with the poorest health to seek behaviour change. Both of these utilise the instrument of the nudge and can be considered somewhat effective so far, as there has been an increase in the number of children walking or cycling to school in the area (Cardiff and Vale UHB 2023), however this will need to be assessed over a longer period.

Additionally, the WFGA seeks to directly change the behaviour of the public, with an important element of the Act being that it becomes the Welsh public's legislation rather than just government law (Davidson, 2020, p.138), and that it brings change to people's lives and behaviour (Future Generations Commissioner, 2019, p.10). The FGC highlights examples of one hundred 'changemakers', consisting of heads of organisations, writers, poets, and activists who have changed their behaviour and made the Act more than a piece of legislation (Future Generations Commissioner 2023b). Additionally, the Commissioner considers it to have influenced the public in the pursuit of a circular economy, noting examples of the North Wales reusable nappies scheme;

repair café's; and a community 'Library of Things', where people can borrow what they need and donate what they don't (Future Generations Commissioner 2021e). The Commissioner similarly notes the behaviour change of staff at Gwynedd Hospital, shown through the establishment of a 'Green Group' to create a platform for discussion and action on sustainability, in aim of reducing the hospital's environmental impact (Future Generations Commissioner 2021f). However, it is difficult to conclude the impact the Act has on the public with few examples, and a lack of outright statements detailing its influence. Ultimately a wider in-depth approach is required, which could include surveys and interviews, to gain an understanding of whether the Act has directly changed public behaviour.

This subsection demonstrates some success of the WFGA in changing public behaviour and influencing policy which also seeks this change. If it is assumed that the WFGA has influenced these policies and they have successfully changed behaviour, then the WFGA can be considered a success. However, often more time, examples, and analysis is required to conclude whether behaviour has changed through policy, and it is difficult to be certain that the WFGA has influenced policy without explicit statements. Similarly, more study is required to conclude the extent to which the Act has directly changed public behaviour.

Conclusion

To an extent, behaviour change has occurred of the Welsh Government, public bodies and the public. This is demonstrated by the Welsh Government's decision against the M4 relief road and the twenty miles per hour policy, and through the Cardiff Council's active travel approach. All of which also sought to change the behaviour of the public. However, there are multiple issues, such as difficulty in being able to measure whether behaviour change has occurred, and in being able to directly attribute change in behaviour to the influence of the Act without an explicit statement. It is important to acknowledge these issues as being able to conclude whether behaviour has changed is an important aspect of measuring the WFGA's success, as changing behaviour is central to the Act. Much of this can be overcome in a future study where more time would allow for fairer assessment

of whether behaviour has changed, and more examples to be available. Such a study should also include an in-depth assessment on the WFGA's direct impact on the public, and on policy decisions. Ultimately, it is difficult to explicitly state that the WFGA, in this regard has been a success.

Conclusion and Framework

This dissertation has aimed to assess the extent to which the Well-being of Future Generations Act 2015 (Wales) has been a success, and whether the success of such a policy can be measured. This is important as it is an aspirational, overarching, and world-leading policy (Howe 2022) whose success has yet to be assessed, whereby there is a necessity to discover whether this is an effective approach to address major societal issues and protect the lives of current and future generations. The dissertation has sought to evaluate this through highlighting different aspects that are considered to constitute success and assessing whether these aspects have achieved their intentions; how impactful the Act was on achieving these; how effective each is as a means of measuring success; and therefore, the extent to which this demonstrates success of the WFGA. The conclusions for these aspects have varied throughout this paper. Firstly, both 'typical' measures of policy success and the (McConnell 2010) and (Marsh and McConnell 2010) framework lack applicability to this policy and are ineffective means of measuring its success. Second, others learning from the WFGA is considered a partial success as the FGC notes examples of this, but it could be improved through more explicit recognition of the Act's influence. There has also been relative success of holding government and public bodies to account, which would be a more effective measure if measuring this was made easier and the public could do it more easily. Fourthly, well-being can be considered to have improved yet faces major issues over how much can be attributed to the Act and the difficulty in measuring well-being, therefore it cannot be considered an explicit success. Finally, behaviour change has occurred and can partly be considered to have done because of the Act. A more explicit

statement of its impact could confirm this and improve it as a measure of success. Consequently, it is difficult to categorically state that the WFGA has been a success in this aspect.

Therefore, this dissertation proposes that an effective framework for measuring the success of the WFGA and other 'future generations policies' includes:

- Has the policy influenced the adoption of a similar policy elsewhere?
- Has the policy allowed national government and public bodies to be held to account on their actions?
- Has well-being improved?
- Has behaviour changed? – Of the national government, public bodies, and the public.

Success in multiple of these aspects can constitute overall success of the WFGA, and if this policy can be concluded to be a success, then it could help inspire other countries to adopt such an approach.

An in-depth study of whether the WFGA has been a success, which utilises this framework, should be undertaken by an independent actor in a reasonable number of years after more time has passed.

There are multiple issues with each of these aspects which through such a study can be overcome.

For example, more time would allow for more examples of countries policy learning; holding government and public bodies to account; and instances of behaviour change to effectively assess all of these as elements of success. Also helping the measuring of well-being improvement as more time would result in increased data of the well-being indicators to be available, which could also be improved with assessment that combines both quantitative and qualitative means. Similarly, more time would also allow for fairer assessment of whether behaviour change has occurred. Additionally, the most consistent issue in assessing the WFGA's success is the uncertainty in how much can be attributed to the influence of the Act. This can be overcome through greater study and through explicit statements of the Act's influence on others adopting similar policy; and on changing the

behaviour of governments, public bodies, and the public. In addition to a similar statement on the Commissioner's influence in holding bodies to account and influencing policy seeking to improve well-being. Acting on these recommendations would allow for a better and fairer assessment of the policy's success. However, there are other issues that cannot be as easily overcome such as the influence of the WFGA, when an explicit statement does not suffice. Particularly for assessing the Act's impact on the well-being indicators and on policy decisions where external factors are present and personal interpretation is required. In addition to the underlying issue of measuring the complex concept of well-being: hedonically being unable to compare two subjective experiences and eudemonically by measuring well-being only through quantitative means. The WFGA further complicates this through considering well-being not just in individual terms but also of society.

This success framework can be directly applied to other future generations policies, whereby after following these suggestions, success can be effectively evaluated an appropriate number of years after implementation. Furthermore, elements of this framework and lessons learnt from this paper can be useful in assessing the success of other long-term policies. Firstly, with whether the policy has influenced others in adopting a similar approach. Secondly, and more notably, whether the policy has caused a change in behaviour which is often necessary to tackle long-term societal problems (Tummers 2019). This should be combined with other policy specific measures of success that would include a replication of well-being improvement. Furthermore prior to implementation, policymakers should set out what success of their policy will be, make it measurable, have multiple aspects of success, and have an independent actor assess it.

In conclusion, the success of the Well-being of Future Generations Act can be measured despite doing so being complex with multiple aspects to success, many of which can overlap. However, it is not yet possible to conclude that it has been a complete success, as any success in different aspects is largely overshadowed by the highlighted issues. If the framework's recommendations are acted

upon and an in-depth study is undertaken in due course, then it is still possible for the Act to be considered a success, despite the presence of unavoidable issues.

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Appendix

Appendix A

<u>National Well-being Indicators</u>	<u>Well-being goals Relating To</u>	<u>Has a Milestone?</u>	<u>Hedonic / Subjective or Eudemonic / Objective</u>	<u>Quantitatively or Qualitatively Measurable?</u>	<u>Has it Improved? (since 2015)</u>
01. Healthy babies	- Healthier - More Equal	No	Eudemonic	Quantitatively	No – increased percentage of underweight babies
02. Healthy life expectancy	- Healthier - More Equal	Yes – narrow the gap in healthy life expectancy between least and most deprived by at least 15% by 2050.	Eudemonic	Quantitatively	No - Remained consistent but expectancy slightly decreased in males
03. Healthy lifestyle (adults)	- Healthier - More Equal - Cohesive Communities - Culture and Language	Yes – increase percentage of adults with two or more healthy lifestyle behaviours to over 97% by 2050	Eudemonic	Quantitatively	No - Remained the same
04. Air quality	- Prosperous - Resilient - Healthier - Globally Responsible	No	Eudemonic	Quantitatively	Yes – level of Nitrogen Dioxide pollution has decreased
05. Healthy lifestyle (children)	- Healthier - More Equal - Cohesive Communities	Yes – increase percentage of children with two or more healthy behaviours to 94% by 2035 and 99% by 2050	Eudemonic	Quantitatively	Yes – number of children with two or more healthy behaviours has increased
06. Young children developing the right skills	- Prosperous - More Equal - Cohesive Communities - Culture and Language	No	Eudemonic	Quantitatively	No – measures have mostly decreased largely possibly due to COVID-19
07. School leavers with skills and qualifications	- Prosperous - More Equal - Culture and Language	No	Eudemonic	Quantitatively	No – school performances decreased slightly due to COVID-19 and performance results were not calculated
08. Adults with qualifications	- Prosperous - Healthier - More Equal	Yes – 75% of adults with Level 3 or higher	Eudemonic	Quantitatively	Yes – number of adults with qualifications has increased

		qualification by 2050			
09. Productivity – Gross Value Added	- Prosperous	No	Eudemonic	Quantitatively	Yes – slightly but is still lower than most other comparable regions
10. Disposable household income	- Prosperous - Healthier - More Equal	Yes – Improve GDHI per head by 2035 and a setting growth target for 2050	Eudemonic	Quantitatively	Yes - GDHI per head has gradually increased
11. Innovative businesses	- Prosperous - Resilient - Globally Responsible	No	Eudemonic	Quantitatively	No – decreased overall but impact of COVID-19
12. Renewable energy	- Prosperous - Resilient - Cohesive Communities - Globally Responsible	No	Eudemonic	Quantitatively	Yes – capacity of renewable energy equipment installed has increased
13. Healthy soils	- Prosperous - Resilient - Globally Responsible	No	Eudemonic	Quantitatively	N/A – not enough or recent enough data
14. Global footprint	- Prosperous - Resilient - Globally Responsible	Yes – Wales to use only its fair share of resources by 2050	Eudemonic	Quantitatively	Yes – global footprint per person has decreased – until 2018 N/A after
15. Waste not recycled	- Prosperous - Resilient - Cohesive Communities - Globally Responsible	No	Eudemonic	Quantitatively	Yes – non recycled household waste per person has decreased
16. Fair pay	- Prosperous - Healthier - Cohesive Communities - Globally Responsible	No	Eudemonic	Quantitatively	Yes – percentage of people who earn real living wage has increased
17. Pay difference	- Prosperous - More Equal	Yes – eliminate the pay gap for gender, disability and ethnicity by 2050	Eudemonic	Quantitatively	No – the pay gap for gender, ethnicity and disability has not decreased
18. People living in poverty	- Prosperous - Resilient - Healthier - More Equal - Cohesive Communities	Yes – reduce the poverty gap by 2035 and commit to a stretching target for 2050	Eudemonic	Quantitatively	Yes – the percentage of people living in households below average UK income has decreased

	- Culture and Language - Globally Responsible				
19. People living in material deprivation	- Prosperous - Resilient - Healthier - More Equal - Cohesive Communities - Culture and Language - Globally Responsible	No	Eudemonic	Quantitatively	N/A – does not go back to 2015, decreased from 2018-2022 and increased since and overall
20. Pay set by collective bargaining	- Prosperous - Healthier - More Equal	No	Eudemonic	Quantitatively	Yes – percentage of jobs set by collective bargaining slightly increased but fluctuated
21. People in work	- Prosperous - Healthier - More Equal	Yes – eradicate gap between employment rate in Wales and the UK by 2050, focus on fair work and raising employment of under-represented groups.	Eudemonic	Quantitatively	Yes – employment rate has increased amongst select groups
22. People not in education, employment and training	- Prosperous - Healthier - More Equal - Cohesive Communities	Yes – 90% of 16–24-year-olds to be in education, employment, or training by 2050	Eudemonic	Quantitatively	Yes – overall percentage in education, employment or training amongst 19-24. But decreased amongst 16-18
23. People feeling involved	- More Equal - Cohesive Communities - Globally Responsible	No	Hedonic	Quantitatively with the potential for qualitative as is more than a yes or no	Yes – percentage of people who feel they can influence decisions affecting their local area increased
24. Satisfaction with access to facilities and services	- Healthier - More Equal - Cohesive Communities	No	Hedonic	Quantitatively with potential for qualitative as there are differing degrees of satisfaction	Yes – satisfaction with accessing facilities and services has increased (but from 2017)

25. Feeling safe	- Healthier - More Equal - Cohesive Communities	No	Hedonic	Quantitatively with the potential for qualitatively as the concept of feeling safe is more complex	No - percentage of people feeling safe in local area has remained constant
26. People satisfied with where they live	- Resilient - Healthier - Cohesive Communities - Culture and Language	No	Hedonic	Quantitatively with the potential for qualitative as concept is not necessarily binary	Yes – percentage of people satisfied with where they live has increased
27. Sense of community	- Resilient - Healthier - More Equal - Cohesive Communities - Culture and Language - Globally Responsible	No	Hedonic	Quantitatively with the potential for qualitative as the concepts mentioned are more complex	Yes – percentage of people with a sense of community in their area has overall increased
28. Volunteering	- Cohesive Communities - Culture and Language - Globally Responsible	Yes - increase the percentage of people who volunteer by 10% by 2050	Eudemonic	Quantitatively	Yes – percentage of people who volunteer has increased
29. Mental well-being	- Healthier - More Equal	Yes – improve adult and child mean well-being and eliminate gap in well-being between most and least deprived areas by 2050	Hedonic	Quantitatively with the potential for qualitative as mental well-being is more complex than just numerical scores	No - mean mental well-being score has decreased
30. Loneliness	- Healthier - More Equal - Cohesive Communities	No	Hedonic	Quantitatively with the potential for qualitative as loneliness as a concept is complex	Yes - percentage of people who feel lonely has decreased
31. Hazard-free homes	- Resilient - Healthier - More Equal - Cohesive Communities	No	Eudemonic	Quantitatively	N/A – but percentage of homes free from hazards has increased 2008-2018
32. Reducing flood risk to	- Resilient - Healthier - More Equal	No	Eudemonic	Quantitatively	N/A – unable to compare data from 2019 to any previous

homes and businesses	- Cohesive Communities				
33. Energy efficiency of homes	- Prosperous - Resilient - Healthier - More Equal - Globally Responsible	Yes – all homes to have adequate and cost-effective energy performance by 2050	Eudemonic	Quantitatively	N/A – no previous data before 2018
34. Homelessness	- Prosperous - Healthier - More Equal - Cohesive Communities	No	Eudemonic	Quantitatively	No – number of households successfully prevented from homelessness on average has decreased, but certain local authorities have improved
35. Participation in arts, culture and heritage	- Prosperous - Healthier - More Equal - Cohesive Communities	No	Eudemonic	Quantitatively	No – the number of people participating in arts and cultural activities has decreased – but only data since 2017
36. People speaking Welsh every day	- Cohesive Communities - Culture and Language - Globally Responsible	No	Eudemonic	Quantitatively	No – the percentage of people speaking more than just a few words has remained constant
37. People able to speak Welsh	- Cohesive Communities - Culture and Language - Globally Responsible	Yes – a million Welsh speakers by 2050	Eudemonic	Quantitatively	No – the percentage of people able to speak Welsh has remained constant
38. Participation in sporting activities	- Resilient - Healthier - Cohesive Communities - Culture and Language - Globally Responsible	No	Eudemonic	Quantitatively	Yes – the percentage of people participating in sporting activities has increased
39. Professional standards in heritage collections	- Culture and Language - Globally Responsible	No	Eudemonic	Quantitatively	Yes - since 2017 the percentage of museums and archives with meeting standards has increased

40. Looking after our cultural heritage	- Resilient - Culture and Language - Globally Responsible	No	Eudemonic	Quantitatively	No – percentage of historic assets in stable or improved conditions has decreased
41. Greenhouse gas emissions	- Prosperous - Resilient - Healthier - Globally Responsible	Yes – achieve net-zero greenhouse gas emissions by 2050	Eudemonic	Quantitatively	Yes – greenhouse gas emissions have decreased
42. Greenhouse gas emissions from global goods and services	- Prosperous - Resilient - Healthier - Globally Responsible	No	Eudemonic	Quantitatively	Yes – total consumption emissions have decreased
43. Healthy ecosystems	- Prosperous - Resilient - Healthier - Cohesive Communities - Culture and Language - Globally Responsible	No	Eudemonic	Quantitatively	N/A – no comparison available
44. Biological diversity	- Prosperous - Resilient - Cohesive Communities - Culture and Language - Globally Responsible	Yes – reverse decline in biodiversity and improve status of species and ecosystems by 2030 and clear recovery by 2050	Eudemonic	Quantitatively	N/A no data since 2016
45. Water quality	- Resilient - Healthier - Cohesive Communities - Culture and Language - Globally Responsible	No	Eudemonic	Quantitatively	Yes – percentage of water bodies achieving good/high status has increased
46. Active global citizenship	- Prosperous - Resilient - Healthier - More Equal - Cohesive Communities - Culture and Language - Globally Responsible	No	Hedonic	Quantitatively with the potential for qualitative as there is more to the concept than the measurable actions	N/A – first asked in 2021-22 – no comparison

47. Confidence in the justice system	- More Equal - Cohesive Communities - Globally Responsible	No	Hedonic	Quantitatively with the potential for qualitative as the answer may not always be binary	N/A - newly added indicator – no data
48. Journeys by walking, cycling or public transport	- Prosperous - Resilient - Healthier - More Equal - Globally Responsible	No	Eudemonic	Quantitatively	N/A – first asked in 2021 – no comparison
49. Housing costs	- Prosperous - More Equal - Cohesive Communities - Culture and Language	No	Eudemonic	Quantitatively	Yes – percentage of households spending third of their income on housing has decreased
50. People digitally included	- Prosperous - More Equal - Cohesive Communities	No	Eudemonic	Quantitatively	N/A - newly added indicator – no data

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Senedd Cymru | Welsh Parliament

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol | Equality and Social Justice Committee

Ymateb gan: Asthma + Lung UK Cymru | Evidence from: Asthma + Lung UK Cymru



Post Legislative Scrutiny- Well-being of Future Generations Act 2015

About Asthma + Lung UK Cymru

At Asthma + Lung UK Cymru our vision is for a world where everyone has healthy lungs. A world where lung health is prioritised through better understanding, research, treatment and support. We are dedicated to helping create a world where good lung health and the ability to breathe freely are a basic right enjoyed by all.

We will be the driving force behind the transformation of lung health. From research and campaigning to advice and support, as the nation's lung charity we are on a mission to change the way that lung health is perceived.

Right now, the situation needs drastic improvement. We need change to improve the lives of millions of people with lung conditions.

Introduction

Asthma + Lung UK Cymru welcomes the opportunity to contribute to the post-legislative scrutiny of the Well-being of Future Generations (Wales) Act 2015 (the Act).

We support the Act's vision to embed the sustainable development principles in public service delivery and to improve long-term health outcomes across Wales. However, progress in addressing respiratory health has been limited since the inception of the well-being goals.

Respiratory health affects a significant minority with 1 in 5 people in Wales living with a lung condition such as asthma or COPD. Also external factors such as air pollution have a negative impact on the health of the population at large with the impact being acutely felt by children whose lungs are still developing.

While the Act's seven well-being goals are clear and measurable, we do not see this taken forward into legislation design to affect this principles.

Health and Well-being:

The Act requires public bodies to work toward a “healthier Wales”. Yet this ambition has not been realised in respiratory care. Wales has the highest mortality rate for respiratory disease in Western Europe. Individuals in our most deprived communities are five times more likely to die from COPD and three times more likely to die from asthma than those in wealthier areas.

The avoidable mortality rate is the number of deaths that could be avoided either by preventing disease or through effective healthcare. This has declined by 4% for respiratory disease in the last 20 years, whereas cardiovascular disease has improved by 56% in Wales.

Despite the publication of the Quality Statement for Respiratory Disease in 2022, implementation remains weak. Just 30% of people with asthma receive NICE recommended basic care¹, this is only 1% higher than the number surveyed in 2015.²

These figures highlight the urgent need for clear accountability mechanisms and improvement plans that translate national ambitions into practice. The current guidance does not go far enough to ensure the equitable delivery of respiratory care. The lack of performance indicators in the Quality Statement undermines efforts to monitor and improve services at the health board level.

Quality Statements and delivery plans do not provide guidance for Health Boards on how to implement them. They also do not set any measurable targets leading to subjectivity and no clear standards.

Clean Air

The Act’s goals of “a resilient Wales” and “a globally responsible Wales” require urgent action on air pollution. Air quality is a major public health concern, contributing to around 2,000 premature deaths annually in Wales. It disproportionately affects children, people with lung conditions, and those living in poverty³.

However, action at the local level has been inconsistent. Our analysis found that no local authority in Wales has taken enforcement action under Smoke Control Area powers in the past five years. This represents a systemic failure to operationalise legislation intended to protect public health⁴.

The ongoing implementation of the Environment (Air Quality and Soundscapes) (Wales) Act 2024 has so far been lacking clarity and ambition. What we have seen fails align with the Healthy Air, Healthy Wales strategy, while there are significant delays in the majority of the expected secondary legislation. On this area the Act is not going far enough to ensure Welsh Government’s actions truly have the best interests of future generations at heart.

Cross Governmental Working

While the Well-being of Future Generations (Wales) Act 2015 should act across all areas of government, and despite the introduction of Health Impact Assessments, we have not seen this affect how government departments relate to each other.

For example, in recent guidance regarding air quality and smoke control, very little consideration has been given to the public health implications of air pollution.

Conclusion

The Well-being of Future Generations (Wales) Act 2015 remains a pioneering piece of legislation. However, its potential to deliver transformative change in health and environmental outcomes has yet to be fulfilled. To

¹ Asthma + Lung UK, *Living with a Lung Condition survey, 2025*

² Asthma + Lung UK Cymru, *This is Life + Breath: Why the Quality Statement for respiratory disease needs to be implemented urgently, 2024*

³ Asthma + Lung UK Cymru, *Domestic Burning in Wales, 2025*

⁴ Ibid

realise its ambition, respiratory health must be prioritised through stronger accountability, improved local implementation, and targeted investment in services and public health.

For further information, please contact Bec Miller at [REDACTED]

Written Evidence Submission: Post-Legislative Scrutiny of the Well-being of Future Generations (Wales) Act 2015

Introduction

My name is Taylor Hawkins, and I am the Managing Director of [Foundations for Tomorrow](#), a youth-led non-profit based in Australia committed to embedding long-term thinking and intergenerational fairness into governance and policy. I also currently serve on the executive leadership team of the [Network of Institutions for Future Generations](#) and previously worked within the [United Nations Foundation's Our Future Agenda](#) team in the lead-up to the 2024 United Nations Summit of the Future.

I submit this evidence to highlight the profound international impact of the Well-being of Future Generations (Wales) Act 2015 (the Act) and, critically, the importance of its associated independent and statutory Commissioner. Although I speak from outside Wales, my perspective offers insight into how this pioneering legislation has shaped global discourse, inspired international legislative reform, and anchored innovative tools supporting systemic change and intergenerational thinking in public policy.

Summary of Key Points

- The Future Generations Commissioner's Office is a globally recognised leader in intergenerational governance, youth engagement, and public policy innovation.
- The Act is regarded internationally as a benchmark for future generations governance, with its statutory Commissioner ensuring credibility, consistency, and long-term accountability.
- Its model has directly informed legislative developments in other jurisdictions, including Australia.
- The small but high-performing team in Wales has achieved remarkable global impact with modest resources, demonstrating extraordinary value for money.

1. A Global Benchmark for Future Generations Policy

The Welsh Act remains the world's most advanced legislative framework for sustainable development and intergenerational fairness. Its success lies not only in its ambition but in its implementation structure, particularly the statutory nature of the Future Generations Commissioner, which protects the integrity of the role from political interference. This independence ensures continuity, fosters public trust, and safeguards the Act's purpose from the political tides of the day. The Act's holistic framework and practical "ways of working continue to offer inspiration and replicable tools for other governments seeking to embed long-term thinking in decision-making.

2. Catalysing Global Legislative Reform

The Welsh model has sparked significant momentum globally. In jurisdictions such as Australia, Ireland, Scotland, and the Balearic Islands, legislation has either been introduced or actively developed based on the Welsh framework. In Australia, the [Wellbeing of Future Generations Bill](#), introduced in February 2025, was closely shaped by the Welsh example and the strategic guidance provided by both current and former Commissioners.

3. Driving Innovation in Youth Engagement and Policy Tools

Between 2022 and 2024, Foundations for Tomorrow collaborated with the Office of the Future Generations Commissioner for Wales to co-develop:

- [The Future Generations Leadership Accelerator](#), which has supported over 1,000 young people globally to lead on intergenerational fairness.
- [The Policy Leader Toolkit](#), designed for public sector decision-makers embedding long-term thinking in governance.

These tools have reinforced Wales' status as a global leader in both engaging the next generation and enabling current leaders to embrace intergenerational innovation.

4. Sustained International Influence and Statutory Strength

The strength of the Welsh model is in part due to the statutory independence of the Commissioner. This design feature distinguishes it from other mechanisms that rely on political favour or temporary mandates. It engenders trust across civil society, builds legitimacy across political cycles, and has enabled the Welsh Office to speak with authority on the global stage.

As someone who has sought strategic advice from both Sophie Howe and Derek Walker and their teams, I can attest to the enduring value their independence brings, allowing them to challenge, guide, and inspire without constraint. This statutory foundation is essential for the continuity and credibility of future generations work, and should be protected and strengthened in any future reform.

5. A Small Team with Global Reach: Extraordinary Value for Money

One of the most remarkable features of Wales' leadership in this field is that it has been delivered by a relatively small team. Despite modest resourcing, the impact has been profound both locally, by influencing policy and practice across government and globally by inspiring new laws, building a movement, and positioning Wales as a credible authority on intergenerational governance.

The return on investment is exceptional, with Wales reaping reputational, diplomatic, and strategic benefits. It has become a lighthouse for countries around the world, proving that visionary leadership and meaningful systems change are possible.

Conclusion

The Well-being of Future Generations (Wales) Act 2015 is an example of what is possible when long-term thinking is embedded with integrity and purpose. I submit this evidence in support of upholding and further strengthening the Act and the Commissioner's role, both for the benefit of Wales, and for the growing global community seeking to follow in its footsteps.

Senedd Cymru | Welsh Parliament

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol | Equality and Social Justice Committee

Ymateb gan: Gwasanaeth Eiriolaeth Ieuenctid Cenedlaethol Cymru |
Evidence from: National Youth Advocacy Service Cymru

NYAS Cymru Evidence Submission - Well-being of Future Generations (Wales) Act 2015: Post-legislative scrutiny

About us

NYAS Cymru (National Youth Advocacy Service) is a leading children's rights charity providing independent advocacy, support services and legal representation to children and young people across Wales who are subjected to child protection proceedings or are living in local authority care.

We thank the Equality and Social Justice Committee for undertaking an inquiry on post-legislative scrutiny of the Well-being of Future Generations (Wales) Act. Our evidence submission has been constructed through a children and young person's lens. We would welcome the issues raised in our submission being considered as part of the Committee's oral evidence sessions.

Children and young people are the future generation of Wales; therefore, it is imperative that all public bodies are responsible and accountable for children and young people having every opportunity to thrive and have a happy, healthy and safe childhood so they can achieve their best outcomes. Through the Well-being of Future Generations (Wales) Act and subsequent wellbeing goals, national indicators and milestones, there are real opportunities to achieve this for children and young people in Wales. Our evidence focuses on key issues impacting children and young people and what actions could be taken to improve the effectiveness of the Act through policy change and reform.

Children and young people as the future generation

Embedding the views, wishes and feelings of children and young people are at the heart of public body and government decision making enriches policy and ensures it reflects the diverse perspectives and experiences of everyone impacted by these decisions. Policy makers must make sure children's voices are embedded at the most senior levels of government, representing their views, holding officials to account, and always asking, "Would this be good enough for my child?". To achieve the national indicators and milestones, and ensure the Act and its objectives are continuing to improve the social, economic, environmental and cultural well-being of all children and young people in Wales, we would recommend:

- Appointing a Minister for babies, children and young people to put the views, wishes and feelings of children and young people at the heart of Welsh Government.
- Reviewing and expanding the powers of the Children's Commissioner for Wales.
- Fully and directly incorporating the UNCRC into Welsh domestic law and develop a comprehensive children's rights strategy for Wales.

Child poverty

We are concerned that not enough is being done to eradicate child poverty in Wales or address the

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interconnection between child poverty and the care system in Wales. Child poverty remains one of the greatest threats to children's rights being fulfilled and there is a distinctive link between child poverty and the number of children entering care in Wales. With Wales having the second highest rates of child poverty of all the devolved nations, it is unsurprising that the rates of children entering care in Wales are also higher compared with those across the UK. Similarly care leavers are at a much higher risk of experiencing poverty and at the point of leaving care, support services are drastically reduced. NYAS Cymru fundamentally believes that care must not be a respite from poverty, nor should children leave care only to enter back into poverty. Until child poverty is completely eradicated in Wales, the Act will not be able to achieve its milestone of reducing the poverty gap between people in Wales with certain key and protected characteristics (which mean they are most likely to be in poverty) and those without those characteristics by 2035. To better work towards this, we would recommend:

- Placing a statutory duty on Welsh Government Ministers to annually publish targets to eradicate child poverty in Wales and monitor the progress of achieving this.
- Devolving the benefits system to Welsh Government to help lift more children, young people and their families out of poverty.
- Increasing the Tax-Free Personal Allowance to help lift young people out of poverty.
- Making all public transport fares free for all children and young people up until the age of 25 in Wales.
- Providing a long-term solution to financially supporting young people transitioning from care by making the Basic Income available for all care leavers across Wales.

Early intervention services

Early intervention services for children, young people and their families is imperative to improve the social, economic, environmental and cultural well-being in Wales. Early intervention is also important for helping to keep families together, wherever is safe to do so and helps to reduce the number of children entering care in Wales. Achieving this requires a shared commitment as well as sustainable long-term investment in preventative, family support and edge of care programmes of support including provision through the Families First programme, parental advocacy and other vital support programs. Making sure all children, young people and their families can benefit from robust, funded and accessible early intervention services as soon as needed is essential to achieving the Act's milestones and well-being goals. While there are some good examples of support already existing across Wales, we believe more could be done to further strengthen the impact of this work through:

- Creating a statutory entitlement of parent advocacy for all parents across Wales who are at risk of entering child protection or are receiving care and support from social services.
- Creating a statutory definition of early intervention and ensure the future of the Sustainable Social Services Third Sector grant by making it a part of core funding to provide a long-term funding commitment to critical third sector led projects and initiatives.
- Continued funding and expansion of the Flying Start Programme.

Supporting care-experienced children and young people

For care-experienced children and young people, they will often face far greater barriers to accessing opportunities and are more likely to experience inequality, discrimination, structural, systemic and intergenerational disadvantage throughout their lives. It is imperative that these inequalities are recognised and understood at all levels of Government and public bodies, and there are targeted policies in place to both reduce these inequalities and promote equity.

The 'a more equal Wales' wellbeing goal presents a strong opportunity for these barriers facing care-experienced children and young people to be addressed, and to do so, we would recommend:

- Creating more training and work opportunities for care leavers by developing paid internship and apprenticeships schemes across Welsh Government, the voluntary sector and public bodies in Wales, helping to achieve the milestone of 'at least 90% of 16–24-year-olds will be in education, employment, or training by 2050'.
- Continuing to lobby the UK Government to make 'care' a protected characteristic under the Equality Act 2010 and continue to encourage every local authority in Wales to make care a protected characteristic at local level as part of their corporate parenting commitments, to achieve the 'a more equal Wales' wellbeing goal.
- Undertake a review of the Corporate Parenting Charter by 2028 to understand who has signed up to the pledge, how it has been implemented in practice, whether signing up to the charter should be placed on statutory footing, alongside developing an accountability framework.
- Establish a specialised service to provide all support care-experienced children and young people access to advocacy for any physical, mental or emotional health related issues to help achieve the milestone of 'improving adult and children's mean mental wellbeing and eliminating the gap in adult and children's mean mental wellbeing between the most deprived and least deprived areas in Wales by 2050' and the well-being goal of a 'healthier Wales'.

Ending intergenerational cycles of care

There is a fundamental and systemic problem in Wales regarding the intergenerational cycle of care. Care-experienced mothers are disproportionately at a higher risk of being subjected to child protection

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proceedings or separated from their children, often for no other reason than that they themselves grew up in care. NYAS Cymru's Project Unity service provides intensive wraparound support to care-experienced young mothers or expecting mothers in Wales, with an aim of helping to keep families together wherever possible. The service is currently funded by Welsh Government through the Social Services Sustainability Grant until 2026. Since the service launched in 2020, NYAS Cymru have supported over 500 young women across Wales – in which over 90% of these women were subjected to child protection proceedings.

Making sure all care-experienced mothers can access the right support during and after their pregnancy and ending the disproportionate intergenerational cycle of care and discrimination facing these young women in Wales would help to achieve several of the Act's well-being goal 'a more equal Wales'. For this to happen in practice, we would recommend:

- Developing a statutory active offer of support from Project Unity for all care-experienced young women are pregnant and/or have children in Wales.
- Commissioning an independent inquiry into the disproportionate rate of children born to care experienced young women becoming the subject of local authority child protection proceedings.

For more information, please contact [REDACTED]

Post-legislative Review of the Well-being of Future Generations Act, 2015

Professor Luci Attala

Deputy Executive Director, UNESCO-MOST BRIDGES sustainability science programme at the University of Wales, Swansea

Overview:

The *Well-being of Future Generations (Wales) Act 2015* is a pioneering piece of legislation that has embedded long-term, sustainable thinking into Welsh public policy. Internationally celebrated, it positions Wales as a leader in aligning governance and practice with intergenerational justice. The Act was not designed to deliver immediate economic returns, but its potential to reduce long-term costs through prevention and resilience-building is profound. Properly implemented, the Act is an investment and an opportunity to avoid future crises by addressing their root causes now. For it to represent enduring value for money, it must continue to be supported by adequate resources. The Act's significant achievements and notable successes are exemplary and groundbreaking in essence. However, as with all things, there is still room for improvement as its full potential has yet to be realised.

This document outlines key achievements, systemic challenges, and areas for strategic improvement, and offers concrete recommendations to enhance the Act's effectiveness and long-term impact.

Executive Summary

This paper proposes a strengthening of the Future Generations Commissioner's Office (FGCO), legislatively, financially and strategically in association with acknowledging the significant and considerable successes of the Act. It recommends a formal extension of the Office's remit to playing a proactive role in shaping the national and global discourse on sustainability and future-oriented governance. A broadening of remit would allow the FGCO to champion the visionary future thinking it embodies, both nationally and internationally, and catalyse the much-needed global action by its very real ability to lead through example.

The Act has laid a strong foundation for sustainable policy in Wales and should continue to do so. However, this proposal responds to criticisms that the Act has been initially overly reduced to a compliance exercise, centred on procurement policies, performance frameworks and meeting KPIs, rather than advancing the kind of imaginative, transformative thinking needed to shape the future that Wales aspires to. The current *Cymru Can* and the *Wales We Want*

initiatives, by instigating national conversations, are beginning to address this gap meaningfully, as are the futuring workshops the FGCO are running. In this context, it would be valuable to reposition the Commissioner's Office as a custodian of collective imagination, not merely a guardian of compliance.

The Act's success hinges on consistent application, adequate resourcing, international engagement and strengthened enforcement mechanisms. Reinforcing these areas will be crucial for continuing the achievements of the Act's timely and ambitious objectives.

Personal Experience and Evidence of the Act's Influence

My own experience engaging with the Act has shown first-hand its potential to inspire meaningful, international policy innovation. During a lecture I delivered to a delegation of Indian officials visiting Wales, I explained the principles and practical impact of the Act sparking in-depth discussion, ultimately catalysing interest in adapting a similar legislative framework for the state of Mumbai. This moment affirmed the Act's resonance beyond Wales, its values and structure offer a scalable, transferable and adaptable model for governance rooted in long-term thinking and intergenerational equity.

In parallel, I work closely with UNESCO's Management of Social Transformations section, who have expressed strong interest in understanding the Act's mechanisms in greater detail, particularly its potential to inform global policy on sustainability and futures thinking. These interactions demonstrate not only the conceptual power of the legislation but its ability to provoke dialogue and inspire concrete steps toward systemic change in diverse cultural and political contexts.

UNESCO-MOST BRIDGES is the only transdisciplinary, humanities-led sustainability science programme within the UN family of organisations. It has established its International Programme Office in Wales, partly in recognition of Wales's exemplary commitment to sustainability, as embodied in the Well-being of Future Generations Act.

The University of Wales Trinity Saint David, in collaboration with the UNESCO-MOST BRIDGES programme, is actively developing a 'Future Generations Quality Mark', a consumer-facing accreditation designed to identify and celebrate companies and organisations that are demonstrably working with the well-being of future generations in mind, across all scales of operation. The 'quality mark' will signal a commitment to the future. It will serve as a visible and credible symbol indicating that an organisation aligns its practices, values, and strategies with the principles of the Act. In addition, it will promote transparency and accountability, support ethical consumer choices, encourage business transformation, foster cultural and ecological regenerations and has the power to bridge global frameworks (the SDGs) with local action. Overall, the Future Generations Quality Mark will be a practical tool for systems change, helping to rebalance the relationship between economy, society and environment through values-led recognition and meaningful accountability in line with the aims of the Act, that others will be able to emulate.

Noteworthy Achievements of the Act and the Future Generations Office

- **Long Termism:** The Act has instilled a long-term perspective within Welsh public bodies, influencing policy areas such as education, health, infrastructure and planning.
- **Policy Impact:** The Act rightly influenced the Welsh Government's decision to cancel a £1.1bn road project, recognising its failure to meet the needs of future generations and a landmark moment reflecting commitment to long-term sustainability over short-term economic gain.
- **International Recognition:** The Act continues to garner global attention and inspire emulation, with the UN Secretary-General, endorsing the concept of a special envoy for future generations, citing Wales as a pioneer and an inspiration.

Key Challenges

- **Lack of Enforcement:** The Future Generations Commissioner has limited powers to enforce compliance, relying on advocacy rather than legal mandates.
- **Resource Constraints:** There is a clear irony in the fact that a body established to promote long-term thinking is working with public bodies constrained by short-term budget cycles, with limited ability to plan and implement effective long-term strategies.

Recommendations

As global issues concerning climate adaptation, mitigation and social justice deepen, and as societies everywhere struggle with inequality and poverty, it is time for bolder action that both leads by example and meaningfully moves the needle in establishing long-lasting, more than surface, system change.

The Act was intended to embed long-termism, sustainability and by association well-being for future generations into decision-making, and it is leading the world in this regard. However, to avoid the Act becoming experienced by public bodies as a procedural checklist, Wales has an opportunity to embrace a shift in focus towards a bold, co-creative framework of future visioning that reimagines Welsh society and what we are striving for, *rather than perpetuates what exists sustainably*. A shift from a focus on maintaining development within sustainable boundaries towards establishing models of regenerative futures that repair damage and adapt to changing conditions is required. This shift must earnestly champion post-growth and circular approaches, and should be locally relevant, co-designed and culturally rooted combining Welsh cultural heritage and multiculturalism.

To reach beyond sustainability to flourishing, resilient, regenerative futures and to continue leading in this regard, the FGCO should be supported to:

1. **Encourage the Nation's Imagination** by bringing art, fiction and speculative design into public policy spaces to imagine and implement radical alternatives.
2. **Support Futuring** by teaching people what designing futures means. This might include funding local projects that co-create place-based future visions rooted in local, cultural and ecological contexts.
3. **Reframe Policy Around the Notion of 'Preferred Futures'** by changing the focus from actions for the "well-being of future generations" to exploring what kind of world we need now to ensure the future, and how do we get there. This reframing requires a shift to policies that proactively shapes futures.
4. **Challenge Systemic Injustice** by understanding that simply guaranteeing a future is not sufficient; we need better futures. Achieving better futures requires dismantling

the systems that create inequality, rely on flagrant consumerism and extractivism and build environments that disconnect people from green spaces and nature.

To give the Future Generations Commissioner ‘teeth’, the role must evolve from primarily advisory and advocacy to normaliser of future thinking and long termism. This can be achieved by,

- Providing comprehensive training and resources to public bodies to enhance their understanding, meeting and bespoke application of the Act's principles.
- Moving beyond aspirational goals and towards the introduction of clearer, enforceable obligations for public bodies to adhere to the Act's principles. By
 - Providing incentives to comply with the Act (e.g.: quality mark)
 - Granting the Commissioner the power to issue directives where public bodies fail to comply with the Act.
 - Enabling the Commissioner to refer non-compliance to an independent ombudsman process.
 - Holding public bodies accountable for their contributions towards the well-being goals by introducing notice for repeated failures to act in line with future generations' interests.
- Ensuring stable, long-term funding is available to support the implementation of change-maker initiatives thereby preventing short-term financial pressures from undermining Wales's long-term goals.
- Increasing the Commissioner's capacities particularly with regard to:
 - Data analysis and systems foresight capabilities.
 - Outreach and education programmes.
 - Regional or local Future Generations officers embedded in public bodies across the nation.

In conclusion, the *Well-being of Future Generations (Wales) Act 2015* is one of the most forward-thinking laws ever passed. To fulfil its promise, it must be enabled to evolve from its compliance-based beginnings into a dynamic, justice-driven, future-shaping framework. Wales has shown the world what is possible. Now it must strengthen its structures, empower its leadership, and reignite its imagination to lead even further.

Senedd Cymru | Welsh Parliament

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol | Equality and Social Justice Committee

Ymateb gan: Platform | Evidence from: Platform

Well-being of Future Generations (Wales) Act 2015: Post-legislative scrutiny Consultation Response

About Platform

Platform was born in 2019 from Gofal, a mental health charity established in Wales in the late 1980s. Through decades of working across housing and mental health, we gained real insight into the reality of mental health in society, the impact of trauma, and the causes of distress. That work led us to change our focus and become Platform, the charity for mental health and social change.

We support people of all ages, across urban and rural communities, in people's homes and alongside other services. Our work spans inpatient settings, crisis services, community wellbeing, supported housing and homelessness, businesses, employment, counselling, schools and youth centres.

Summary of Our Response

- Mental ill health is not because of specific genetic factors or unavoidable chemical imbalances.
- Like health, our mental health is largely determined by our circumstance. It is a complex interaction between our environment, body and mind.
- The social determinants play a key role in the prevalence of mental ill health.
- We must include mental ill health measures within the National Indicators

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Recommendations

- To strengthen the ability of the act to mandate its action and hold accountability to support creating the conditions for new markets and ways of working and address the impact of the commercial determinants of health.
- To strengthen the position of mental health within the act and the conversation surrounding it ensure it places equal importance on the social determinants of mental health.
- Make mental health an integral part of sustainable development and a core part of development measures and goals.
- Reviewing the Wellbeing-duty in part 2 to ensure mental disorders are specifically included in knowledge that they are largely caused by social inequality.
- Review the national indicators and milestones to better reflect a social model of mental health and include a measure on suicide, psychosocial disability (WHO, 2023) and additional learning needs.

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Impact and Value for Money: Importance of the Future Generations Act to Mental Health

“It is no measure of health to be adjusted to a profoundly sick society.”

Krishnamurti, 1960

The Wellbeing of Future Generations (WFG) Act 2015 helps us all to together work within planetary boundaries, improve our environment, our economy, our society and our culture. Amongst many important things that are strengthened in tandem with the Social Services and Wellbeing (SSW) Act 2014, the WFG Act puts into legislation the need to address the social determinants of health. This is paramount to the agenda of improving our mental health because without planetary and community health we can't have mental health. And as planetary and community health continues to decline so will our collective mental health.

As we know the circumstances in which we are born, live, work and age shape our health outcomes (WHO, 2015). This is equally as true for our mental health. We know your postcode is a better predictor of your mental health than your genetic code (Shim & Compton, 2015). This includes all the diagnostic categories from schizophrenia and psychosis to depression to ADHD and Autism (Joseph, 2022; Mate, 2022; Timimi, 2025).

Observed differences in the social determinants are linked to the unequal distribution of resources (Marmot, et. al., 2008). We know that our circumstances are shaped by the distribution of money, power, and resources at global, national, and local levels, which are themselves influenced by policy choices (WHO, 2025). Mental health is therefore largely a social and political issue rather than an individual one.

At the same time, people who are given a diagnosis of mental illness die on average up to 25 years earlier than the general population (Shim 2020). The risk factors for the mental disorder diagnosis are heavily associated with social inequality. The greater the inequality the higher the

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inequality in risk. This means that the more disadvantage someone is exposed to across their life means they are more likely to experience mental ill health (WHO, 2015). It means the one in four statistic about mental health is not evenly distributed but instead correlated to disadvantage and inequality.

This health inequality is not because of specific genetic factors or unavoidable chemical imbalances (Moncrieff et al, 2022; Davies, 2022; Mate, 2022). Like health, our mental health is largely determined by our circumstances and has been well evidenced as so (WHO, 2015, WHO & UN, 2023). It is a complex interaction between our environment, body and mind.

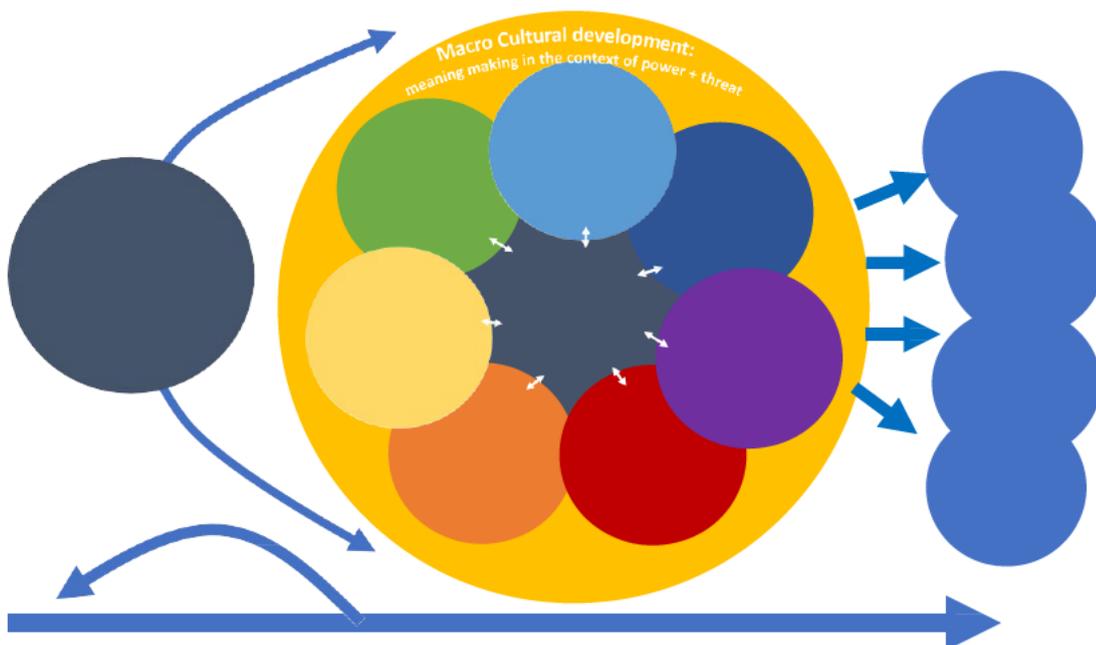


Figure 1: The interactive factors and complexity of our mental health

The social determinants of mental health are not different to those of physical health, but they deserve special attention because of the huge disparity in life expectancy and the large-scale population level misunderstanding about the causes of mental ill health. For example, a study by Professor Moncrieff and colleagues in 2023 found that 80-90% of us believe that depression is caused by a chemical imbalance, including many GPs who continue to prescribe anti-depressants to the public on this basis, but this is in fact not true and never has been. We therefore

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would benefit from a public mental health awareness campaign to correct these myths and properly inform and education the population. This would not only better prepare people to look after and understand their own mental health meaning people seeking support would be better informed and would therefore support NHS mental health colleagues in their efforts to provide effective and prudent intervention and support. Supporting other sectors and the public to understand the limited role of healthcare in health prevention and treatment.

Mental health, at its simplest is about nervous system regulation (the body being in balance; Feltman-Barrett, 2017) and connection to ourselves, others and the world around us. We know that we are more likely to experience overwhelm if we're living in poverty, faced with injustice, forced to rely on fear and shame-based systems, and don't feel connected to our communities, ourselves, or the people around us.

Nervous system dysregulation occurs when there is an imbalance between the sympathetic and parasympathetic branches of the autonomic nervous system. Also known as our threat system this is more commonly known as being in flight, fight, freeze or fawn. We can think of nervous system regulation as being in 'flow and fusion' - with ourselves, others and the world around us. It is normal for our bodies to enter these states; they are how we keep ourselves safe and are our bodies assessing and responding our environment. When we are exposed to too much threat or we can become stuck in these states. This has a negative impact on our mind and bodies as we can get stuck in interpreting things that are safe as threats. You can see here how the term 'mental health' quickly becomes limited as what we're actually talking about is a whole body response.

This is the definition and explanation we use at Platform and it is the definition the new Welsh Government Mental Health strategy has adopted. Having a sense of connection is fundamental to our mental health and wellbeing, including:

- A connection to ourselves - being in tune with how we're feeling physically and emotionally and what matters to us, alongside feelings of control of decisions which impact our lives.

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- A connection with others - positive relationships, appropriate and consensual physical touch, trust and a sense of belonging.
- A connection to the world - feeling part of something bigger. Feeling connected to our community and the world around us including our connection to nature.

The social determinants get in the way of connection in many different ways. Poverty, for example, is one way that connection can get disrupted and increased out exposure to toxic stress. Poverty is a vicious cycle, both a cause and a consequence of mental ill health (Ridley, 2019). Adverse childhood and community experiences (ACCEs) have a long- lasting ripple effect across the future generations (Ortiz, Gilgoff, Burke Harris, 2022; Davis, Pinderhughes, & Williams, 2016). ACCEs are associated in a dose-dependent way with over 60 mental and physical health outcomes and premature death and the COVID-19 pandemic has substantially increased stress globally. It has and is expected to continue to increase rates of stress-related disease and cognitive impairment without appropriate interventions (Ortiz, Gilgoff, Burke Harris, 2022). Growing up in poverty increases a person's risk of developing psychosis (Hastings, 2018; Topor, 2013; Laporte, in press).

It is therefore of major importance that action is taken to improve the conditions of everyday life, beginning before birth and progressing into early childhood, older childhood and adolescence, during family building and working ages, and through to older age. Action throughout these life stages would provide opportunities for both improving population mental health, and for reducing risk of mental disorders (WHO, 2015).

Mental ill health will therefore largely be improved through targeted social and economic policies and programs across the social determinants as opposed to large scale health based individually focused therapy programmes or via mental health services alone. We know mental health services are already at breaking point and referrals for support and assessment have continued to grow but more of the same will not fix this (BBC News, 2021). Despite popular understanding the solutions to mental health are firmly outside of the mental health system.

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The Improving Access to Psychological Therapies (IAPT) model used by NHS England is an example of misplaced mental health policy intervention which the WFG act provides mechanisms to avoid. Less than one in five of those referred to the programme move to recovery (23%; Sidhu, 2019, Davies, 2022). Furthermore, the Health Foundation found that in deprived areas, patients referred for psychological therapy were less likely to receive treatment (2019).

An economic evaluation of an Improving Access to Psychological Therapies (IAPT) service conducted by Mukuria and colleagues described it as probably not a cost-effective approach to mental health intervention (McCone, 2018). These issues are so pervasive that the IAPT model is now testing moving towards a service model that has a focus on addressing the wider determinants of mental health. Outcomes of pilots so far were perceived as having a positive impact on mental health and could reduce the burden on therapeutic services. Warning that service- and individual-level barriers need to be addressed to enhance statutory and community support links, manage service users' expectations, and improve accessibility for certain groups (Curtin, et. al., 2023).

We are fortunate the policy context in Wales means we do not have this model nor its legacy to unravel but have instead embraced ecologically informed holistic approaches such as the Whole Schools Approach and new 2025-2035 Welsh Government Mental Health Strategy. The new strategy not only has a focus on same day open access holistic support but describes a vision that links these principles beyond the mental health system, connecting up public services and recognises the importance on building community and having the building blocks, including the right knowledge, to thrive too.

This is why the WFG Act is seen as a progressive approach mandating a collective direction in policy development across public service to address and supporting ensure the best circumstance for population health. Whilst there are limits to that power because of the devolution arrangements this is still a major step forward in making space and direction action to addressing the root causes of poor health.

Here in Wales the WFG Act, the SSW Act and the Mental Health (Wales) Measure 2010 together provide a legislative framework to support a

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context which allows us to begin to overcome the legacy of these out dated ideas and their historical limitations and harm. The act has allowed mental health services a much-needed legal framework to push forward for a social model of understanding mental health in collaboration with the wider network of public and voluntary sector service provision. Much like what happened over 40 years ago for people with a learning disability in the move from hospitals to community. Wales's policy approach at the time (the All-Wales Strategy, 1983) was and remains progressive in its aspirations today. Finally, we are beginning to be able to apply the social model to our mental health and following in the same progressive and inspiring direction.

The WFG Act arguably paths the way for mental health legislation reform allowing a context to support an approach that would be difficult to realise without space to develop a social model of mental health understanding and the opportunities to pilot cross sector collaborative working.

Mental health continues to grow as a public health priority and human rights imperative. There has been an increase in the number of countries wishing to adopt or reform legislation related to mental health. However, laws on mental health, currently often fail to address discrimination and human rights violations including in mental health care settings. This is true for here in the UK and Wales as well. There are frequent reports in the press of inhumane and undignified incidents occurring in our mental health services, including in our services for babies, children and young people (e.g BBC, 2018).

To support countries in this area, the World Health Organization and the Office of the High Commissioner for Human Rights have recently jointly developed the publication entitled *Mental health, human rights and legislation: guidance and practice* (2023). We are not convinced the UK mental health bill will go far enough. Leaving Welsh Government to pick up and deliver where Westminster has failed.

To achieve the aspirations of these, and other progressive legislation and policy in Wales, including the new mental health and wellbeing and suicide and self-harm strategies we must centre mental health much more centrally in the conversation around the wellbeing of future generations.

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At the same time we must continue to advance supporting mental health legislation to complement the work of the WFG Act.

Review and Reporting

The National Indicators (NI) would benefit from strengthening their mental ill health and wellbeing measures. Indicator 29 which collects a mean of the population's mental wellbeing will miss the fundamental role that inequality plays in mental wellbeing. It will also miss the impact of intersectionality and provide an illusion of wellness that is obscured by these complex loading factors. By focusing too heavily on the 'average,' without more sophisticated data to deepening the context we risk making decisions based on a half-truth, potentially leading to ineffective strategies and misguided expectations. It would be more helpful to reflect this as a percentage who reach a set point on the WEMWEBS measure. This would support making better comparisons to rates of child poverty, poverty, secure housing and the other determinants. Given we know marginalized communities suffer the most from poor mental wellbeing a mean will obscure progress made on addressing this.

At the same time mental wellbeing is only part of the picture and does not capture the breath of what we currently call 'mental health'. Mental health is not separate from physical health or is it separate from mental wellbeing. Better understanding this complex picture will support improvements in our interventions. This is why we welcome NI 30. "percentage of people who are lonely" but need to point out that there is no measure of rates of suicide or of additional learning needs or of rates of mental illness diagnosis or psychosocial disability (WHO, 2023).

Mental health problems cause 22.9% of all 'years lived with disability, the highest burden of any health condition (Whiteford *et al.* 2013). They cause excess and avoidable mortality which has been described as a form of 'lethal discrimination' (Thornicroft, 2013).

Given the high costs to quality and length of life, the integral link between mental health and the social and commercial determinants of health including measures that reflect mental ill health rates would provide a

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more sophisticated and enhanced surveillance picture. This would allow better allocation of resource and intervention to improve population mental health.

The Effectiveness of Guidance Made under the Act should be strengthened

Guidance is not enough. The WGF act has many competing demands and priorities to buffer against. From a mental health perspective specifically a lack of regulation in the pharmaceutical and wider health industry compete unintuitively against improving the populations health. By this we mean that it is in their stakeholders interests that mental health is medicalised and its solutions are medications and biomedical interventions. The United Nations recently warned against this (UN, 2017).

Without legislative power to mandate a change in direction commissioners will struggle to move away from medially orientated business models and make space for social ones because of the dominance of these industries, their economic power to resist evolution in approach and their current monopoly in the market space (Radden Keefe, 2021).

These forces are known as the commercial determinants of health which are the conditions, actions and omissions by commercial actors that affect health. They arise in the context of the provision of goods or services for payment and include commercial activities, as well as the environment in which commerce takes place.

Commercial determinants of health are the private sector activities impacting public health, either positively or negatively, and the enabling political economic systems and norms. They are defined as the “systems, practices and pathways through which commercial actors drive human health and health inequity” (WHO, 2023).

The Act would be strengthened by an ability to mitigate against the commercial determinants of health.

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Conclusion

Mental ill health is not because of specific genetic factors or unavoidable chemical imbalances. Like health, our mental health is largely determined by our circumstance. It is a complex interaction between our environment, body and mind. The social determinants play a key role in the prevalence of mental ill health.

To being to address this we must include mental ill health measures within the National Indicators and we must position mental health as a key sustainable development goal.

Recommendations

- To strengthen the ability of the act to mandate its action and hold accountability to support creating the conditions for new markets and ways of working and address the impact of the commercial determinants of health.
- To strengthen the position of mental health within the act and the conversation surrounding it ensure it places equal importance on the social determinants of mental health.
- Make mental health an integral part of sustainable development and a core part of development measures and goals.
- Reviewing the Wellbeing-duty in part 2 to ensure mental disorders are specifically included in knowledge that they are largely caused by social inequality.
- Review the national indicators and milestones to better reflect a social model of mental health and include a measure on suicide, psychosocial disability (WHO, 2023) and additional learning needs.

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Well-being of Future Generations (Wales) Act 2015: Post-legislative scrutiny – Views from Newport City Council

Committee's Terms of Reference	Views from Newport City Council
How far has the intended objective of the Act been achieved?	The WFG Act has focussed our approach to enhancing the economic, social, environmental, and cultural well-being of the population. By implementing the five ways of working, it has fostered a more collaborative process that ensures we take into account the long-term effects of our decisions on future generations.
Views on any action which should be taken to improve the effectiveness of the Act and its implementation, including any specific drafting issues	It's crucial to address its current focus on the public bodies named in the legislation. There are numerous third sector organisations and bodies that fall outside the scope of the Act and are not required to comply, often relying on voluntary participation. This can affect the collaboration between the public bodies listed in the Act and these external organisations, particularly in areas such as service commissioning.
Are the review and reporting requirements under the Act are being met?	NCC has produced a Corporate Plan and published a set of Well-being Objectives. An annual Corporate Plan self-assessment is also produced (annual report / summary report), we use a summary version to support engagement with the outcomes. All plans and strategies developed by the authority must demonstrate alignment with the Act through its democratic process.
Views on the effectiveness of guidance made under the Act	It is important to consider the guidance related to the statutory Public Services Boards (PSBs). The partnership's setup without additional funding poses challenges in effectively delivering on its Well-being Plan and Well-being Objectives. This is also affected by the number of partnerships that are in place and how they all interact with other effectively. This is supported in Gwent by a move to a regional PSB.
Views on how far the Act has been legally binding and enforceable	There are challenges in compelling public bodies to comply with the Act. Even if these bodies have demonstrated that they considered the Act, the final decisions made may still go against its principles. The practicalities / realities of implementing the legislation often present a real challenge, particularly if there is a financial impact.

Views on how far the Act has represented, and will continue to represent, value for money

It is crucial that the support provided by the Commissioner's Office continues to support public bodies in despite of reduced budgets/resources. Public bodies can achieve better value for money if they work more collaboratively over the long-term through prevention. However, this requires having the systems in place to support such efforts, such as more long-term funding from the Welsh Government.

An example of using funding differently has been demonstrated through the use of a Participatory Budgeting approach in Newport which empowered residents to decide how a portion of the budget was spent ([find out more here](#)).

Senedd Cymru | Welsh Parliament

[Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol](#) | [Equality and Social Justice Committee](#)

Ymateb gan: Prifysgol Wrecsam | Evidence from: Wrexham University

Wrexham University May 2025

Nina Ruddle Head of Public Policy Engagement

[REDACTED]

Please accept this written response for consideration at Senedd Equality and Social Justice Committee for the post legislative scrutiny for the Well-being of Future Generations (Wales) Act 2015 (the Act).

This written response is given in a professional capacity. I currently lead Wrexham University Civic Mission work and have worked for 10 years to develop our approach to the Well-being of Future Generations (Wales) Act 2015 and have worked collaboratively with many partners to develop projects and involve citizens. I am currently vice chair of Wrexham and Flintshire Public Service Board. All the work I lead on, on behalf of the university is framed around the Act, working locally, regionally and in part nationally.

1.0 Context

1.1 The Act is at the heart of our new Wrexham 2030 vision [V&S 2030](#) and is enabled and delivered through our co created Civic Mission work [Civic-Mission-five-year-strategy.pdf \(wrexham.ac.uk\)](#) [Wrexham Rising: The Power of Partnerships by WREXHAM RISING PODCAST SESSIONS \(spotify.com\)](#) The Act has provided the policy and legislative framework that drives all we do, striving towards a Wales we want, having the principles of sustainable development driving decision making and action. We have strived to make the Act the peoples act engaging young people and children in our work. Our work is mapped across our contribution to the 50 national well-being indicators and 17 milestones. The 5-year plan/strategy also echo's the Cymru Can theory of change to enable our strategic direction to support that of national and globally important legislation.

1.2 As a Higher Education institute rooted in place and dedicated to the communities, businesses and people we serve locally, regionally and nationally, we are not required to statutorily respond to the Act in legislative terms (although is required by Medr as one of the 52 public bodies accountable). We choose to use the Act as a framework for all we do on a strategic level because we understand and want to be part of leading the collective challenge of delivering whole system change

on this scale and the need for all organisations to step in and work together to improve the to the economic, social, environmental and cultural well-being for Wales.

1.3 Universities and now the wider Tertiary education sector, through Medr have an important and unique role to play to ensure the Act is embedded and strives to meet the ambition set out in the Cymru Can and respond to the 50 calls to action in the recently published 10 year report from the Future Generations Commissioner and the Auditors Generals review that highlights the Act has not achieved the systems wide change it has set out to achieve.

2.0 Our work

2.1 We have a positive, supportive and proactive relationship with the Future Generations Office (FGO) and we have been delivering and developing the collaborations, infrastructure, projects and education to support and implement the Act in several ways across Wrexham and the North Wales region.

2.2 In our work over the past decade as a key anchor institution we have been at forefront of using the Act as a tool to enable and embed the five ways of working and strive to deliver and develop collaborative work that engages and involves citizens, prevent challenges from getting worse, integrates across the region, simplify the partnership landscape and enabling a long term approach.

Our role as a university led by Nina Ruddle, Head of Public Policy Engagement include:

- Membership of the Supporting Organisations Network for the Future Generations Commissioners Office sharing ideas, good practice and events that support public sector bodies.
- Invited member of the Well-being of Future Generations National Stakeholder Forum with Welsh Government
- Vice chair of the Public Service Board in Wrexham and Flintshire and where we led the merger of Wrexham and Flintshire PSBs
- Advisor to the shaping place for well-being whole systems approach to PSB across Wales (PHW and Health Foundation)

2.3 Our work to enable the Act include:

- **Established and Leader of the North Wales Public Service Lab** (systems leadership programme, C4C Community for Community, network of system leaders and change makers that are all framed around the education we need. These are also networks to connect, share and develop the new ways of working and thinking, in particular, to think and act using a futures lens). The Lab is part of our work to tackle key societal challenges. We have established and run a masterclass programme for systems leadership, space to explore key challenges and developing a network and community of practice for system leaders and change makers. The NW Public Service Lab has enabled a regional approach to Climate Change risk assessments in partnership with the FGO, University of West of England and Futures Institute at Edinburgh university. This has been a key focus for us enabling and cultivating a long-term learning programme and network that support the thinking needed, not just the actions, to deliver against an ambitious legislation.

- **Pioneer of the North Wales Insight Partnership (NWIP)** - we have led the establishment as a collaborative to support the development of the well-being assessment in 2021 and drive innovation, learning and pooling of resources and expertise around 3 key challenges areas of research, engagement and systems change. The insight partnership is open to all and is convened, led and supported by Wrexham University for the 3 PSB's across the region, with support that was secured from the co production network for Wales for 5 years in 2022. This is an 'open invitation and is attended by a number of a vast range of partners from NRW, Welsh Government, data Cymru, Audit Wales, Museums Wales, Housing Associations, Bangor University etc.
- **Key project that have emerged from this work are particularly focused on collaboration and involving citizens in our work meaningfully:**
- Citizens engaged in data analysis of climate change data and development of our thinking around deliberative democracy approaches, report produce for PSBs
 - Future Leaders pilot with young people in Ysgol Clywedog in Wrexham. The PSB members worked with young people for them to help shape the plans and what they want to see for their futures in Wrexham and has subsequently rolled out across 15 schools across the region supported by Xplore!
 - North East Wales Futures engaging citizens in Ty Pawb into different groups across the area to come together and share what matters to them in different ways, including establishing a multi-cultural hub, and hosting an event to share stories, through rap, song, poetry and artwork. This is growing and developing led by the Welsh Government Community Cohesion team. This work also enabled a diverse together conference in March 2025.
 - Co-produced Community Narratives – working with Artists and researchers in 6 communities across North Wales one in each county, to focus on using arts, poetry and creative methods to capture the stories from these communities. This brings a richness to the data that we use to focus and enable action around key priorities. [Co-producing-Community-Narratives-info-for-Denbighshire-2.pdf](#)
 - We have other priorities that we are developing around Welsh Language, Anti racist training and developing a region wide engagement platform and website.
- **Leader of the North Wales Civic Engagement Partnership (supported by Medr funding)**

On 1st May 2025 we convened leaders from across all sectors, with over 40 leaders coming together to develop a shared narrative for the region so that we can navigate the complexity and ensure the resources across the partnership landscape is driven to where is it needed. We will work together to integrate our objectives, and we will work with citizens to shape the priorities and future of our work. To support this, we are developing an enabling infrastructure around the partnership landscape and delivering with communities through the NW Insight Partnership, leading learning with the NW Lab and enabling pool resourcing and research, data and evidence to understand the impact. [University reflects on decade of impact as Future Generations Report 2025 released - Wrexham University](#)

Tirwedd Partneriaeth Gogledd Cymru/North Wales Partnership Landscape



Our work and expertise has been cited by OECD [How to Make Societies Thrive? Coordinating Approaches to Promote Well-being and Mental Health | OECD iLibrary \(oecd-ilibrary.org\)](#), National Co-ordination Centre for Public Engagement (NCCPE) and UK Research and Innovation (UKRI) where our regional work was used to inform a UKRI national £40M programme [Prosperous places: insights into local research partnerships – UKRI](#). Our work in Wales leading the civic mission and Trauma informed approach has led us to be partners in the new Centre for Peoples Justice [Wrexham University announces partnership in new £5 million UK-wide Centre for People’s Justice - Wrexham University](#) as well as a key role enabling the innovative Public Map Platform project in Anglesey with University of Cambridge and Cardiff, [Public Map Platform](#) with a focus ‘to make places better in the UK for the people who live there’.

3.0 A flagship North Wales focus enabled by the PSBs – North Wales Children’s University

3.1 A flagship project that has been delivered and led by Wrexham University in collaboration with Wrexham, Flintshire and then all the North Wales regional PSBs with over 20 partners nationally is the North Wales Children’s University (CU). Focused on what matters to Children and Young People from the Wrexham Well being assessment we led the approach which responded directly to this insight and call for action. The North Wales Children’s University 2023/2024 Pilot supported 1,169 young people to participate in over 27,000 hours of extracurricular activity. We worked with 51 schools across North Wales, with over 600 young people graduating from the North Wales Children’s University, across 4 graduation ceremonies (See video from one of the graduation ceremonies) https://youtu.be/WIUPS7bURIQ?si=TnU_jRDxgaXnsPiJ).

3.2 The following research report sets out 8 recommendations for further development which supports a sustainable approach for the CU across Wales.

Connecting children and young people (CYP) in the most disadvantaged backgrounds through offering structured, engaging skilled activities outside the classroom with economic connectedness to influence relative social mobility. Through extending our reach to local businesses and developing a new partnership approach to this work with the North Wales Economic Ambition Board, we have created a strong and purposeful network of opportunity for children and young people across the North Wales region. An example of this is The Tomorrow's Changemaker's programme (TCM) which is running in North Wales secondary schools for Year 8 pupils. The programme economically connects Year 8 pupils to develop essential knowledge and understanding around the circular economy and sustainability as well as developing career expectations and green skills for our future workforce. This builds on our CU recommendations and extends the offer across North Wales for CYP, their communities and the North Wales economy.

3.3 In addition to the TCM project, we have continued to realise the potential of CU to introduce CYP to new ideas, activities and careers that are not within reach of their existing social circles by working alongside local businesses, e.g. biopharmaceutical company IPSEN Global, to create innovative enrichment projects through our CU 'Project in a Box' initiative. These are delivered to schools, along with staff training, to engage CYP through practical innovative projects. Developments so far include two STEM initiatives; Hydroponics Space Pizza and Medicine in a Box and Navigating the Storm which develops our TrACE work with primary schools. These new initiatives build on our CU portfolio through new skills and innovative ways of engaging young people. The Civic Mission have also been working with partners in Welsh Government and Betsi Cadwaladr to host a conference in May, A healthier, wealthier & fairer Wales - Working together to tackle Child Poverty. It's important to understand the scale of child poverty in Wales to address it effectively.

3.4 The CU Report will be showcased here to show how we can engage children and young people from the most disadvantaged areas in North Wales and beyond. Furthermore, we were invited to share this evidence at The All-Party Parliamentary Group (APPG) for Education inquiry's 'Love of Learning'. This has promoted wider national discussion for longer term impact to capitalise opportunities for children from lower WIMD decile areas who continue to demonstrate concerning primary to secondary educational transitions which result in their significant decline in secondary academic engagement and achievement. We also supported 7 schools to deliver TEDx-style talks ('Bob Talks') on the topic of mental health and wellbeing (see playlist of talks here: https://youtu.be/yvf_YsgHlpo?si=uKTAGy91rmpawZXy).

[-Pupils from across North Wales paving the way for change in the region - Wrexham University](#)

4.0 Learning and challenges

4.1 The Act needs time to develop and shift hearts and minds in the way we work as well as building structure to build trust and drive systemic change.

4.2 Seed funding for Action

This could be supported by engaging far wider with the Act and connecting into communities with a small seed fund 'Futures Fund'. This would support the building and develop capacity and capability to see and deliver the Act as a social movement for all, not just public service responsibility. Encouraging civic society collaboration alongside and with communities.

4.3 PSB membership

Enabling the PSBs to open up membership or develop subgroups to deliver which would include community groups and in particular Town and Community Councils and enabling young people to engage in the priorities and work, being more focused on innovation and new ideas than governance. Supporting the development of innovation eco systems across civic society like the way we have led this in North Wales.

4.4 Measurement and impact – role of universities

A key challenge is measuring impact and using data and evidence effectively and enabling more collaborative working as well as pooling of resources to deliver the well being assessments and plans. This is a unique role Medr and the Tertiary sector can play, particularly universities.

The fiscal constraints on the Higher Education sector are widely publicised, the Research Wales Innovation Fund, applying for external grant funds and pooled resources from partners has funded our work enabling the Act, and our commitment as an anchor institution. More resources that are sustainable will support and enable this work to grow, deliver and measure impact and positive benefits for the communities we serve across the region. A longitudinal research focus will allow us to understand this work and way of working and share this internationally.

5.0 Conclusion

5.1 We are proud of the Act. We have a strong and passionate commitment to realising the ambitious set out and leading collaboration to do this. The Act is not a piece of isolated legislation and has provided a framework to enable change. We have many examples of this in our work some set out above. Cymru Can and the new 10-year report are important milestones to raise the profile of the Act, this gives us a renewed impetus to enable the NW Civic Engagement Partnership to hold ourselves to account on delivering on the 11 summary and (50) calls to action for public services. As always it is people not processes that deliver the Act, and this is evident with determined and committed individuals working together in North Wales. The Insight Partnership was established to build a more integrated approach across the region and enable innovative projects using the PSB regional grant from Welsh Government. Our role is to grow and develop the innovative projects and partnerships to create the systems change needed.

5.2 We will strive to continue to do this against the constraints and challenges we face, in partnership with the Future Generations office and all the partners and communities we serve. We are committed to driving and enabling the Act to deliver for Wrexham and the region.

Senedd Cymru | Welsh Parliament

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol | Equality and Social Justice Committee

Ymateb gan: Coleg Brenhinol yr Ymarferwyr Cyffredinol Cymru | Evidence from: Royal College of General Practitioners

Inquiry into the Well-being of Future Generations (Wales) Act 2015: Post-legislative scrutiny

A written evidence submission from the
Royal College of General Practitioners



The Royal College of GPs Cymru Wales welcomes the opportunity to submit evidence to the Equality and Social Justice Committee regarding the Well-being of Future Generations (Wales) Act 2015.

The Act and Commissioner role it created are so vastly wide-ranging that it is important to address the relative successes of the legislation in perspective. We are relatively early in the term of office of only the second Commissioner. There will inevitably be differences of focus based on each individual's priorities. However, how the current Commissioner or his predecessor addressed the role is not the same as assessing the legislation itself.

When introduced the legislation was not a particularly partisan topic. In more recent times it has sometimes felt as though it is caught within a wider political fracture line around spending priorities and favoured government initiatives.

We would caution against losing sight of the broader ambitions of the Well-being of Future Generations (Wales) Act. The vision of a sustainable more resilient Wales is a goal with which there would be widespread agreement. Debates about the relative balance of focus on the weight given to economic development in comparison to environmental protection or economic redistribution are an important component of healthy dialogue but they do not detract from the overall aim of the legislation.

The focus on preventive care is of particular importance to RCGP. This is simply commonsense. Secondary care costs considerably more than primary care and preventative care provides the best value of all. Yet, we often see the issues afflicting secondary care receiving funding while general practice and preventive care is underfunded.

While we appreciate and support the Commissioner's ambition to deliver equitable economic development, it is important to consider that economic growth is what funds public services through taxation. Wales can do things differently and more fairly, but it should not pretend that it can prosper by opting out of the wider economic sphere. Policy can deliver the ideas for a healthier Wales, but economic development is crucial to sustainably fund the Welsh NHS, social care, housing and community services. There are examples of small nations, such as Estonia, which have seen economic success and harnessed that to support strong bonds of community cohesion and excellent public services.

It is important there is scrutiny of the work of the Commissioner's office, but this should not be limited to what has been done with the tools available but consideration as to

how much more effective it could be should additional powers be made available. There are many organisations within Wales which are not directly elected and whose work is seldom noticed by the public. The Future Generations Commissioner has a high profile and accountable role with a vitally important remit. Whatever improvements can be made or criticisms levelled, Wales would be far more at risk of repeating the mistakes of short-term or election-cycle planning without the existence of the role. RCGP believe it is central, and possibly essential, to delivering a healthier Wales.

Introduction

RCGP Cymru Wales welcomes the opportunity to contribute to this inquiry and applauds the committee for placing its focus on general practice. However, the scope of the inquiry presents a challenge in itself.

Our approach has been to set out a broad overview of the challenges, the opportunity which exists for general practice to play a pivotal role in alleviating pressure elsewhere in the NHS and then to consider each of the points noted in the call for evidence.

We hope that there will be interest in speaking to GPs about the topics mentioned and would be happy to suggest potential witnesses to the committee with relevant specialisms, for example on tackling health inequalities or GP retention.

Overall, we hope that this submission is the start of a constructive dialogue with the Committee, and we would welcome on-going engagement during this inquiry.

A picture of decline

The stark truth is that general practice is in crisis. In 2002, GPs worked across 516 practices in Wales. By the start of the pandemic in 2020, there were 404 practices. Today, just 374 GP practices remain. There are many factors contributing to this decline, but at its core is the lack of a plan for a sustainable general practice service for patients.

In the last year, we have started to see the number of full-time equivalent GPs increase and we hope this will continue but it is against a backdrop of a shortage of capacity which is leading to excessive pressure on the workforce. Furthermore, the relatively small increase is from a starting point which was calculated by the BMA to represent an existing shortfall of 664 GPs in comparison to the OECD EU average.

Each year, RCGP surveys its members. In 2024:

- 58% of respondents felt that their mental wellbeing had declined while working as a GP over the last 12 months
- 37% of respondents felt they were 'unlikely' to still be working in general practice in five years' time
- 64% of respondents said a reduction in their administrative workload would be likely to retain them in general practice for longer
- 83% of respondents felt that patient safety is being compromised by excessive workload
- 57% of respondents said that their practice requires additional works to improve or upgrade the premises to meet practice/patient needs
- 65% of respondents disagree that they have enough time to adequately assess and treat patients during appointments.

There will always be a need for family doctors and for general practice, but what form it takes is open to question.

If the role is sustainably funded through the NHS, it will become the public service we need, offering quality care for patients, managing acute and chronic illness, with the essential capacity needed for preventive care. If it is not, then market forces will demand that the baton be picked up by the private sector and general practice will become more like private dentistry. This will inevitably widen health inequalities across the nation.

This is not a fanciful suggestion of a dystopian future. Already services which were once provided by NHS GPs are increasingly managed by private practices for those patients who can afford them. Examples include minor operations, joint injections, freezing warts, syringing ears, and spirometry.

A reason for optimism

However, the frustration within general practice is not simply that the workload is unsustainable, it is that with proper resourcing general practice could be a saviour of the wider NHS. The GP Voice Survey noted above also found that 74% of respondents felt that their practice could alleviate pressure from hospitals if it had more staff/resources.

Research has shown that every £1 spent on funding general practice saves £3 of hospital costs¹. There is an additional financial benefit if early treatment enables the patient to remain economically active. The NHS Confederation found that for every additional £1 spent on primary or community care, there was scope to increase economic output by £14².

We believe that general practice offers a vital opportunity to resolve long-standing and recurring challenges within the health service.

¹ <https://www.bmj.com/content/387/bmj.q2295>

² <https://www.nhsconfed.org/news/extra-investment-out-hospital-care-can-reap-billions-wider-economy>

Point-by-point

The future of general practice is wide-ranging topic upon which there is much to say. We have sought to focus on the key issues related to each of the points proposed by the Committee in their briefing for the consultation. Nonetheless, we hope that there will be opportunities during the Committee's hearings to expand upon these points and, where appropriate, thread them together into a wider narrative of the role general practice can play.

- **Challenges threatening the sustainability of general practice, including:**

- **the funding model for general practice and current financial pressures**

It is impossible to address the decisions taken by the Welsh Government without acknowledging the fundamental issues which exist with the Barnett Formula. A calculation based on the health needs of the people of England is never going to adequately address the health challenges within Wales. In addition, irrespective of the calculation, the delay of payment of a Barnett consequential until the next block grant is accentuating the inequality between the English and Welsh NHS.

Notwithstanding the problems of the devolved funding settlement, we believe that decision-making over funding by the Welsh Government has failed to match the rhetoric of a shift of resources towards primary and preventive care. The pressures facing general practice are rarely as headline-grabbing as the publication of an eye-wateringly long, condition-specific waiting list or a queue of ambulances outside a hospital. Nonetheless, these issues in secondary care are often the symptoms of deep-rooted ailment in the system.

The frustration is that the case for shifting investment into primary and preventive care is no longer contentious. Research has shown that every £1 spent on funding general practice saves £3 of hospital costs³. There is an additional financial benefit if early treatment enables the patient to remain economically active. The NHS Confederation found that for every additional £1 spent on primary or community care, there was scope to increase economic output by £14⁴.

We accept that the benefits of investing in general practice today will take time to manifest in secondary care. That means in the short term there would need to be an increase in NHS spending. However, it would be focused and designed to deliver longer term savings to the health service and to the productive economy more generally.

- **the efficacy of different models for managing general practice**

³ <https://www.bmj.com/content/387/bmj.g2295>

⁴ <https://www.nhsconfed.org/news/extra-investment-out-hospital-care-can-reap-billions-wider-economy>

RCGP has 55,800 members in total and 2,100 in Wales. Among those members you will find GP partners, salaried GPs working for health boards and for general practice at scale business models, you will also find private sector GPs. The College seeks to do its best to represent all members and thus we do not have a set preference for a model of general practice.

Notwithstanding this stance, there are observations which we hope will benefit the Committee's deliberations.

GP partnership is still delivering excellent value for money. The model also allows for a nimbleness of planning by the partners. However, there are real challenges around premises liability and the 'last person standing' scenario in which only one partner is left after colleagues leave the partnership. It could also be noted that the NHS is over-reliant on partners working above and beyond the expected hours of a salaried GP without remuneration.

Our survey data in recent years has suggested that there is a desire among GPs to become partners but a lack of expectation that they will have that opportunity. With this in mind, RCGP has teamed up with the North Wales Primary Care Academy to deliver a Pathway to Partnership programme to help GPs develop the non-clinical skills required for partnership⁵. This is currently in its first year and we hope will be a scheme which will grow.

General practice at scale has come under political and media scrutiny in recent months. There are concerns about how such a model is implemented, but we would caution against 'throwing the baby out with the bathwater'. There is value in combining back-office functions and having scope to share medical professionals between different locations thus creating a more robust system than can adapt when a GP or member of their team is unavailable to work.

We think it important that relationship-based care is not lost in an at scale practice and that there is a contingency in place should the at scale business fail because its potential impact on patients would be multiples of that of a smaller practice closing. We note with interest the Northumbria Primary Care not-for-profit at scale model.

- **the suitability and maintenance of general practice estates and access to digital technology**

General practice estates are at breaking point. Some are in urgent need of modernisation, while others are relatively modern but cannot keep pace with the growth of the multi-disciplinary team requirements for space, and the needs of trainees who will be our next

⁵ <https://www.linkedin.com/pulse/gps-from-across-north-wales-invited-4zxpe/>

generation of NHS colleagues and family doctors. Future general practice estate development should consider energy efficiency and environmental sustainability.

Premises are a considerable cost and concern to GPs. A lease or mortgage is funded indirectly by the NHS, but it is the partner who is liable. This can create a significant financial challenge if their practice becomes unviable, a particular stress faced by partners in the 'last person standing' scenario where they are the final GP after others have left the partnership. In addition, a potential new partner could be discouraged by having to take out a loan to buy in to the practice. RCGP Cymru Wales believes that there should be an opt-in central general practice estates body which would hold the liability of the buildings, leases and mortgages centrally. This would make partnership a more appealing option for GPs. No GP should be obliged to join the scheme, but we believe it would be an attractive option to many.

Wales has been behind the curve on the adoption of technology in general practice and the wider NHS. Work on the NHS Wales app only seemed to begin after a similar product had been available in England for a couple of years. There remain outstanding questions about how usable it will really be for patients from a general practice perspective. There was a similar late-adopter approach to e-prescribing, the progress of which has been welcome but now seems to be dragging, and also digital shared patient records.

It has to be acknowledged that digital appointment booking is a function patients understandably expect in an environment in which so many services are just a few clicks away. To triage patients effectively using such a system requires adequate resourcing.

- **The general practice workforce, including workforce planning, the recruitment of new staff into general practice, the retention of experienced staff, staff workload and wellbeing, training and continuing professional development, and the growth of the multidisciplinary team**

The College would like to place on record our gratitude for the comprehensive engagement which took place during the preparation of the Strategic Workforce Plan for Primary Care⁶. Our concern, however, would be that while the themes and direction of travel are to be welcomed, there is a lack of clarity over numbers per profession.

There is widespread support for the multi-disciplinary team in general practice. This structure allows patients to see the most appropriate professional in the most efficient way. It also creates a learning environment which is to the benefit of all members of the practice team.

Unfortunately, without clear numbers, it also opens the door to fears of providing general practice 'on the cheap'. Wales already lacks the number of GPs that patients require.

⁶ <https://heiw.nhs.wales/workforce/strategic-workforce-plan-for-primary-care/swppcsummary2024/>

How can we audit the improvement in this situation if there is not a stated ambition to reach a specific number of GPs proportionate to the needs of the community?

The College applauds the excellent work of Wales' medical schools in developing the next generation of GPs and their colleagues. However, we have recently seen a marked shortage of GP positions being available. This is because of financial decisions taken both by the Welsh Government regarding general practice funding and the UK Government in regard to changes to National Insurance, meaning that practices are unable to afford to employ them. To have a shortage of GPs and a shortage of jobs for GPs is a government policy failing which is adversely affecting patients.

GP retention remains a major challenge. Our GP Voice survey shows that 37% of GPs in Wales do not expect to be working in the profession in 5 years' time. For some this is linked to retirement, but that was only the third highest response following, 'I find general practice too stressful' and 'I have to work too many hours in general practice' demonstrating the acute workload pressure.

- **The patient experience of general practice, including equitable access to care, effective management of patient demand, the quality of care, and public trust in the services provided.**

A figure equivalent to more than half the population of Wales, is seeking a GP appointment every month. Management of this is inevitably a challenge and one which would benefit from increased resourcing. The National Survey for Wales for 2021-22 recorded that 59% of respondents were very satisfied with the care they received in general practice and a further 27% fairly satisfied⁷. This question was not included in the 2022-23 survey and thus is the most up to date available. While the College would not wish to be complacent, it is encouraging to see strong levels of satisfaction. However, we also note that initially accessing a convenient appointment was regarded by a third of respondents as difficult.

RCGP Cymru Wales welcomes measures which have been taken to recognise the importance of continuity of care within the GMS contract. This is a step in the right direction to a general practice which values delivering quality care for patients. The time constraint imposed by 10-minute consultations mean that GPs increasingly need to be reactive, treating the immediate symptoms presented to them, rather than having the time to focus on potentially deeper-rooted causes. It can also prevent GPs from proactively addressing important preventive topics such as diet and lifestyle advice, gambling concerns, domestic abuse or supporting patients with smoking cessation.

This was echoed by results of our 2024 GP Voice survey. When asked whether there is enough time during appointments to build the patient relationship needed to deliver

⁷ <https://www.gov.wales/national-survey-wales-results-viewer>

quality care, 57% of our members disagreed. Furthermore, 65% of members felt that they do not have enough time during appointments to adequately assess and treat patients.

RCGP welcomes recent work with Welsh Government and the British Medical Association General Practitioners Committee to develop a Continuity of Care Quality Improvement measure. Continuity of Care refers to the consistent and seamless provision of healthcare services to a patient over time. Patient outcomes are enhanced by the development of trust, mutual respect and co-production with their clinician. Continuity of care also leads to a better understanding of the patient's ideas, expectations, and family circumstances. Patients who benefit from seeing the same GP over time are less likely to attend hospital whether that be acutely in the emergency department, or to see a secondary care consultant in outpatients, thus reducing waiting lists. GPs who offer this care have greater job satisfaction and make fewer mistakes. It is an effective means of improving the quality of care delivered, for a lower overall cost. Practices multidisciplinary teams will be asked to work and learn together to develop adaptations to strengthen the continuity of care through quality improvement initiatives and to maintain accountability through regular Quality Improvement updates, reporting to clusters and health boards.

- **Opportunities to improve general practice to make it fit for the future and take a more preventative approach to care.**

Much of the narrative of Welsh Government has focused on a shift in resources towards primary and preventive care, however, there appears to be a disparity between what is written and what is occurring in terms of funding. A queue of ambulances waiting outside a hospital or a publication of eye-wateringly high waiting list numbers are always more likely to drive headlines and thus the political agenda, rather than tackling the root causes. In this instance, the problems and pressures of secondary care are the symptoms of a condition which can be alleviated through a well-resourced general practice.

The proportion of the NHS budget allocated to general practice in Wales has been decreasing for more than a decade. This decreased funding has been catastrophic, especially when one considers that 90% of all NHS patient encounters occur in primary care.

Again, we accept that the benefits of investing in general practice today will take time to manifest in secondary care. That means in the short term there would need to be an increase in NHS spending. However, it would be focused and designed to deliver longer term savings to the health service and to the productive economy more generally.

A sustainably resourced general practice is good for the patient, the wider NHS and the Welsh taxpayer.



Senedd Cymru | Welsh Parliament

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol | Equality and Social Justice Committee

Ymateb gan: Comisiynydd Cenedlaethau'r Dyfodol Cymru | Evidence from: Future Generations Commissioner for Wales

Senedd
Cardiff Bay
Cardiff
CF99 1SN

27th May 2025

Dear Jenny,

Re: Well-being of Future Generations (Wales) Act 2015: post-legislative scrutiny

Thank you for the opportunity to contribute to the Equality and Social Justice Committee's post-legislative inquiry into the Well-being of Future Generations (Wales) Act. I welcome the Committee's proactive steps in undertaking this important work as we mark the tenth anniversary of this landmark legislation.

As you will be aware, I recently published my statutory [Future Generations Report 2025](#), which provides a comprehensive assessment of how Wales is performing to deliver on Wales's seven well-being goals. This report includes detailed analysis, case studies, and 50 recommendations aimed at improving implementation across Welsh Government and public bodies. I would encourage the Committee to reflect on the findings and recommendations of this report as part of its inquiry.

Importantly, the report includes a specific recommendation that a post-legislative review of the WFG Act should be undertaken by Welsh Government. The Auditor General makes the same recommendation in his recent report, ['No time to lose.'](#)

The Committee's inquiry is an important opportunity for us to collectively consider how we strengthen implementation of the WFG Act and deliver better outcomes for current and future generations.

To properly review the effectiveness of the WFG Act and to consider future legislative amendments, I encourage policymakers to involve the people of Wales, in keeping with the commitment made in 2014 through the national conversation 'The Wales We Want'.

In submitting this letter, I would like to draw the Committee's attention to the following key points for consideration:

1. **The WFG Act is delivering positive change** – The law is making an impact today and

for the long-term. Evidence shows that the WFG Act is guiding important decisions by public bodies and embedding sustainable development. The annual Well-being of Wales report shows the extent of progress towards the seven national well-being goals. There is positive change but there is much more to do. I have provided detailed evidence of the impact of the WFG Act later in this submission.

2. **People support the vision** – There is widespread commitment to the WFG Act amongst leaders and employees of public bodies. This support and pride in the Welsh approach to protecting the interest of future generations extends to voluntary organisations and businesses too. Where the public is aware of the law, people express support for its aims. The WFG Act was shaped by the national conversation in 2014, ‘The Wales We Want’. It is a people’s Act. We must continue to honour and deliver on the commitments we made to the people of Wales and to our future generations.
3. **We must accelerate progress**– While progress is being made, we are not on track to achieve our seven well-being goals. My Future Generations report 2025 identifies areas where implementation must be improved. However, as the Auditor General has said too, the WFG Act has increased in prominence. There is growing awareness and understanding of the WFG Act, and as time goes on, public bodies are getting better at implementing it. Nonetheless, more action is needed. This requires commitment and leadership from public bodies as well as the necessary skills and resources to turn intention into action.
4. **The approach is essential for Wales’s future** – All countries must prepare for the future. The WFG Act provides the framework we need in Wales to prepare for future challenges, such as the climate emergency and demographic shifts, as well as to harness future opportunities, such as green growth and artificial intelligence. It ensures we look ahead at future trends and take a more preventative approach, improving outcomes and delivering better value for money in the long run. If we did not have the framework of the WFG Act, we would need to replace it with something else.
5. **The law should be strengthened** – After ten years of learning, there are aspects of the law itself which could be strengthened. My views are set out in this submission. The inquiry presents an important opportunity to consider any changes collectively.
6. **Wales is a global leader** – Wales is a pioneer but not an outlier. The WFG Act remains a pioneering piece of legislation, inspiring similar approaches internationally. At a time of growing global momentum around intergenerational fairness and sustainability, Wales’ leadership offers soft power and international influence which we should continue to harness.

Committee Terms of Reference

In this section I respond to each of the areas outlined in the terms of reference and look



forward to providing further detail and evidence during the oral session in November.

1. How far the intended objective of the WFG Act is being achieved

How the Act is making an impact

There is much to recognise about the progress made and the impact delivered since the WFG Act came into force. The Act has:

- framed debate and helped get issues on the agenda, for example the idea of a [universal basic income](#), which led to a basic income pilot for care leavers;
- led to many commitments from government, for example the establishment of a [procurement centre of excellence](#) following my office's recommendation and most recently to changes in the format of the Rivers Summits so that they consider all Welsh rivers and all pollutants and have a greater focus on delivery;
- secured procedural change in how public bodies make decisions, for example see how Bannau Brycheiniog National Park developed its strategic plan [Y Bannau: The Future](#);
- informed policymaking, such as [Welsh Government's new Priorities for Culture](#);
- influenced practical behaviour change, for example the five ways of working are the behaviours the whole of the Welsh public sector are required to demonstrate and my office can now measure that change through the [Ways of Working Progress Checker](#).

Examples

There are lots of examples of the Act's impact, many of which are contained in my reports, most recently in the [Future Generations Report 2025](#). I have included some further examples below:

- **Ensuring a greater focus on prevention.** The Welsh Government's new Integrated Medium Term Plan Guidance for the health service now includes a strategic objective on prevention. Samia Edmonds MBE, Planning Director of the Healthcare Strategy and Planning Division in Welsh Government has said:

"The WFG Act remains key to informing and shaping the statutory NHS Wales Planning Framework...The Act is a priority feature of NHS planning, albeit we recognise that there is further progress to be made. As a result, there is now a much stronger focus on prevention and population health cross policy and through NHS planning. The encouragement, challenge and support of the FG office has helped us identify opportunities to work collectively. Prevention and population health is now integral to integrated medium term plans and is the mechanism to drive sustainable service solutions across Wales over time."

My office developed a definition for prevention with Welsh Government to inform budget strategy and decision-making processes, which are a fundamental part of driving change across public services in Wales.

- **A more sustainable transport system.** [The Llwybr Newydd Transport Strategy](#) is guided by the WFG Act. My team advised officials and convened stakeholders to advocate for a national strategy that increases public transport, walking and cycling. [Research](#) that my office produced in 2018 influenced the rejection of an M4 relief road, which would have burdened future generations with £1.4bn of debt and compromised space for nature and set out the alternative spending priorities. Budget allocations for public transport and active travel infrastructure have increased.
- **Fixing the food system.** The WFG Act is a catalyst for action to fix our food system for future generations. [Food Matters](#) is a short, simple overview of Welsh Government's food related policies and activities. It illustrates how food related policies are developed and delivered in response to the WFG Act as well as the Programme for Government. In my strategy [Cymru Can](#) and the Future Generations Report 2025, I set out the evidence to show that without improving access to healthy and sustainable diets, Wales cannot achieve the goals of the Act. The WFG Act and the work of my team are stimulating action across Wales. For example, Carmarthenshire Council has designed the first ever Public Services Board food strategy and twelve Welsh councils are now participating in the 'Welsh Veg in Schools' programme to supply free school meals with Welsh produce in line with their duties under the WFG Act.
- **Education with the future in mind.** The new national curriculum is shaped by the WFG Act. The [Curriculum for Wales](#) (CfW) implementation plan maps the long-term outcomes of CfW against the seven well-being goals. My team undertook research on [education](#) and on the [long-term skills gap](#). This formed the basis of advice to Welsh Government officials on the national curriculum being based around the WFG Act. My office has also:
 - advised Qualifications Wales on the reform of GCSEs and vocational qualifications to reflect the skills we need for a more prosperous, equal and resilient Wales;
 - collaborated with the WJEC to create a [qualification](#) on the WFG Act which is now being delivered across Wales;
 - advised officials on the national [Employability and Skills Plan](#) to reflect a well-being economy;
 - advocated for a National Nature Service being established.
- **Beyond the public sector:** The Act has impact beyond the public sector. It sets out a national mission which requires all organisations to get behind if we are to be successful. Many private and third sector organisations apply aspects of the legislation voluntarily, for business and other reasons. One of those organisations is the Principality.



Julie-Ann Haines, Chief Executive of Principality Building Society, said: *“The Well-being of Future Generations Act is hugely important – not just to Principality Building Society, but to the private sector as a whole, helping to guide and shape responsible business strategy. While Principality is not bound by the Act, we are compelled as a purpose led mutual in Wales to support its delivery and work collaboratively for the benefit of communities.*

As a mutual, we are committed to creating lasting impact that extends beyond our scale. Through our sponsorship of the Future Generations Leadership Academy, we support young leaders to better understand the Act and create action to tackle key social issues. Over the past two years, our colleagues have participated in the Academy, focussing on inclusion and financial education initiatives. We have also aligned our community funding approach with the principles of the Act – launching our Future Generations Fund in partnership with Community Foundation Wales. Since 2021, we have supported over 130 different groups, awarding over £1.5million in grants – with the selection criteria embracing the wellbeing goals of a prosperous, more equal Wales.”

The national indicators

The national indicators were put in place to measure progress towards the seven well-being goals. The [Well-being of Wales](#) Report tracks our collective progress towards the national well-being goals using [national indicators](#), providing insight into how effectively we are implementing the Act.

Some indicators have improved, such as the overall employment rate, participation in sport by adults, and police recorded hate crime dropped by 4% compared to the previous year. But some indicators have worsened, including life expectancy in Wales, reflecting rising poverty, inequality, and preventable illnesses.

The national milestones cover several of the national indicators at once. Some national milestones show progress, such as a 27% reduction in direct carbon emissions since the WFG Act was introduced in 2015 (data up to 2021) and the percentage of people volunteering. However, other milestones have remained stagnant or declined.

2. Any action which should be taken to improve the effectiveness of the WFG Act and its implementation, including any specific drafting issues

Improving the effectiveness of the WFG Act and its implementation is the core mission in my strategy, Cymru Can. Some of my comments below build on previous assessments my office and I have made to Welsh Government and Senedd Committees.

- **Leadership:** Where I see good implementation of the WFG Act, bold leadership in support of brave decisions is a strong and recurrent theme. But this is not happening across Cymru. Therefore, I believe there should be a greater focus on building the knowledge capacity of our public sector leaders and those with responsibility for the corporate areas of change, such as finance, assets and workforce planning. Academi Wales could play a bigger role in this regard.
- **More focus on outcomes:** The focus should be on delivery and outcomes, but the Act and statutory guidance emphasise governance and process (because it was thought they would lead to sustainable long-term decisions). In practice the focus has often been on process to the detriment of outcomes. The statutory guidance could be amended to redress the balance.
- **Resources:** As the Auditor General and I have reported several times, lack of resourcing (across the public sector and my office) is often cited as a reason why the WFG Act has not been implemented as fast as we would like and is one reason why it has not yet delivered the systems wide change it was created to deliver.
- **National indicators and milestones:** The national indicators and milestones are a key element of the WFG Act. They are the envy of many other countries. They help define what matters to us in Wales and how we implement the UN Sustainable Development Goals (SDGs) in Wales. A key issue is the lack of alignment between national goals, indicators and wellbeing objectives. There are still public bodies that do not integrate their well-being objectives, standing separately from organisational objectives, and not linked to our national goals and performance indicators/milestones. This needs to be the case if we are to deliver on the common purpose.
The national indicators are not very visible. The annual Well-being of Wales Report deserves more attention from Welsh Government, from public bodies, from the media and the Senedd too.
Furthermore, milestones were interpreted by Welsh Government as complementing the goals (what will be achieved by 2050) rather than mid-points or milestones on the way to 2050. The latter approach might have helped accelerate progress.
- **Partnerships:** My predecessor and I have consistently called for Welsh Government and public bodies to simplify the partnership landscape in Wales, which is complex and confusing, adding to capacity and resource pressures. This has also been the conclusion of several ESJ and PAPAC Committee reports.
- **Integration:** The WFG Act should frame other policies and legislation. It should not

be seen as a competition, contradiction or an additional layer of burden. For example, there are many assessment requirements in a multitude of laws. These need to come together where possible, e.g. the climate change risk assessments, equality assessments, population needs assessments etc. They should be taken into account by PSBs as they complete their well-being assessments.

- **Communication:** There is a need to ensure consistency in using the language of the WFG Act in legislation, policy, guidance, ministerial statements, performance frameworks and terms of reference for review boards. Currently it can be confusing for public bodies and a barrier to implementation. For example, there are inconsistencies in what we mean by the terms ‘involvement’ compared to ‘consultation.’

Specific drafting issues

There is case to consider drafting amendments to improve the following issues:

- **Clarity of the application of the five ways of working to everything public bodies and Public Services Boards (PSBs) do.** This might require an amendment to ensure it is not perceived as being limited to only setting well-being objectives.
- **Corporate areas for change.** The concept does not appear on the face of the WFG Act but only in the statutory guidance. The statutory guidance, Shared Purpose, Shared Future 1, outlines how embedding the WFG Act into corporate functions is essential to delivering meaningful change. These corporate areas of change include: corporate planning, financial planning, workforce planning, asset management, procurement, risk management and performance management. There is a case to include these corporate areas of change in the legislation to raise their importance and visibility as they are such a key driver for the change we need to see.
- **Clarification/overlap of monitoring powers between the Auditor General and the Future Generations Commissioner:** The statutory guidance of the Act outlines the Commissioner’s role as supportive, with the powers of advice, assistance and the ability to carry out reviews. The Auditor General for Wales is described as holding the accountability of public bodies in meeting the Act. Therefore, there is some confusion with the Commissioner’s duty to monitor and assess the progress public bodies are making towards their well-being objectives.
- **Town and Community Councils (TCCs)** should be involved in drafting PSB plans as they are required to help implement them further down the line. This creates an involvement and delivery issue which needs to be addressed. The threshold requirements for the involvement of TCCs is currently a £200K budget over the previous three years. This should be looked at as currently TCCs can come in and out of scope depending on the annual variation of their funding.
- **Advisory Panel:** The membership of my advisory panel is statutory and very specific. There is a case to allow more flexibility in the membership of the advisory panel to provide the range of skills and experience appropriate to the work plan of the

Commissioner. In light of this issue, I have extended the role of my Audit and Risk Committee to undertake an advisory function (as well as an assurance function).

- **Funding from the Senedd:** To protect my independence, there is a case for the Commissioner to stop being funded by the Welsh Government and become funded directly by the Senedd out of the Welsh Consolidated Fund as Audit Wales is.
- **Publication by public bodies and PSBs of objectives, plans and annual reports.** The Act should be amended to ensure there is duty on public bodies and PSBs to send the Commissioner a copy of their objectives and plans as well as their annual reports detailing progress made to meet their objectives. This would make the monitoring of progress much easier and improve transparency/accessibility for the public to identify the relevant documents and progress. There is currently no consistency in the publication and accessibility of such information.
- **Imbalances of powers in relation to public bodies and PSBs:** My office is mandated to provide intensive support to PSBs in designing their assessments and plans, but I have no duty to monitor their progress. On the other hand, I am required to monitor the progress of public bodies in meeting their objectives but have no duty to provide support to them in setting their objectives individually. However, my office does provide general advice through the Future Generations report. Some consistency would be welcome.
- **Public Services Boards:** PSBs are not a legal entity capable of holding funds or of employing staff. They can only rely on the resources and capacity of their members. PSB members have told my office that this is an issue that can inhibit collaboration. I believe the role and functioning of PSBs could be improved.
I must respond to three elements of the work of PSBs in a short space of time: the PSBs' well-being assessment consultation; during the drafting of their objectives; and then again during the formal consultation on plans. This is disproportionate and is not the most effective use of resources. I would recommend the legislation is changed to keep the formal consultation part and to revoke the other two elements. Several PSBs have told my team that the 5-year cycle is too short, meaning that they have to re-do their well-being assessments and plans too often. This reduces their capacity to deliver.
- **Timelines synchronisation** - The Act is based on 5-year cycles in line with Senedd elections. Now that Senedd elections have moved to a 4-year cycle, many requirements will have to happen more often (like the Future Generations reports) which affects the capacity of public bodies and my team as well as PSB cycles. It will also create clashes, for example local government elections are not planned to change which means this will clash with the 2037 Future Generations Report and the arrival of a new Commissioner; one year I will have to produce advice to PSBs as well as produce a Future Generations report; and the Future Trends reports will get out of synchronisation with the local elections. We think the timelines should be reviewed and amended so we can address any issues.

- **Scope and enforceability of the Commissioner’s section 20 review recommendations:** See section 3 for further information.

3. Whether the review and reporting requirements under the Act are being met

There is more to do to improve the way reporting across the public sector is aligned, streamlined, and used to drive learning and improvement. This is an area where further support and clarity could enhance the effectiveness of the WFG Act.

Reporting and review requirements on public bodies and PSBs:

- **Content of well-being statements:** The statutory guidance of the Act sets out the content of public body well-being statements and states that public bodies are required to review and report annually on the progress they are making towards their well-being objectives and steps. Most public bodies meet these requirements through their regular corporate planning and annual reporting mechanisms. However, some public bodies have not placed their well-being objectives and steps at the heart of their corporate strategies. This is more common in the health sector (as [Audit Wales](#) also reported), with some bodies failing to clearly state their well-being objectives.
- **Review and revision of well-being objectives:** In producing an annual report, public bodies and Public Services Boards must review their well-being objectives and steps. Again, most do this through regular annual reporting mechanisms but given some public bodies have not placed their well-being objectives at the heart of their corporate strategies, a minority of public bodies are not sufficiently revisiting and reviewing their objectives regularly. Timescales are also mismatched in terms of reviewing objectives, which adds to challenges of bodies following the recommendations of the Future Generations Report.
- **Disparity in well-being objectives:** There is currently a lack of a common framework for setting well-being objectives, steps and measuring them, meaning that the current piece-meal approach makes "assessing the progress made towards well-being objectives" impossible. Analysis by my team and by [Audit Wales](#) found that public bodies rarely state the timescales they envisage to meet their well-being objectives, or the resources (including financial) needed to meet them in their well-being statements, despite this being a statutory requirement. A mandated common framework by Welsh Government for every sector would make this significantly easier for the Auditor General for Wales, the Commissioner, and members of the public to understand progress in implementing the Act.
- **Monitoring progress on well-being objectives:** Whilst public bodies and PSBs can set as many well-being objectives and steps as they like, there are currently nearly 300

well-being objectives and over 2,200 steps across the public bodies and 47 objectives, and 296 steps across Public Services Boards. Each objective and/or step often has different associated indicators. Therefore, measuring progress against each of these is highly resource intensive and does not lead to comparable results. I have conducted and commissioned analysis of the well-being objectives, but it is a challenge to resource this and keep up with the changes.

- **Stronger links to well-being goals:** My Future Generations Report 2025 offers advice to public bodies on setting well-being objectives and steps. A common framework, as suggested earlier, mandated by Welsh Government, could help public bodies and Public Services Board make a stronger link between each of their well-being objectives, the well-being goals and well-being indicators when they set and report on their delivery.
- **Impact Assessments:** Adopting a statutory Impact Assessment process for the WFG Act could help improve the application of the Act in decision making and policy design. While there are no statutory WFG Act impact assessments, several public bodies have designed them with the support of my office and use them regularly. A good example of the positive impact of conducting such an impact assessment can be found in relation to the design of the [Welsh Government Waste strategy, Beyond Recycling](#).

Commissioner's review powers (Section 20):

My strongest power is to undertake reviews under Section 20 of the WFG Act. My office has undertaken two investigations so far. These have resulted in Welsh Government making changes to how they implement the Act; and the establishment of a procurement centre of excellence.

The power has been used as the ultimate form of advice when our usual form of advice had not been sufficiently considered or where a recurring issue had been flagged many times as being a key barrier to the implementation of the Act.

As a result of a review, I can make recommendations (suggestions). Although this has not happened, the Act allows public bodies to disregard my recommendations and send a justification for doing so. I have no powers to enforce compliance.

One criticism of the Act is the lack of enforcement powers. This is something the Committee could explore as part of their scrutiny of the enforcement elements of the legislation. One option in relation to Section 20 could be the ability to issue 'directions' or another form of mandated reasonable action which would need to be defined and limited – within devolution boundaries. This might also include some remedial action. There are other options too and legal advice would be needed to explore them.

It should be noted that undertaking Section 20 reviews is resource intensive. My predecessor could hold and use reserves to fund such exercises but changes in UK

accountancy rules mean that this is not an option available to me.

4. The effectiveness of guidance made under the Act

Statutory guidance: Some of the statutory guidance needs to be updated. The points made above reflect some of the changes required to the legislation and to statutory guidance to reflect the lessons we have learned over the last decade. The legislation is a framework, deliberately not prescriptive; but the guidance can be interpreted as a series of processes to complete. My team have already been discussing updating the statutory guidance for Public Services Boards with supporting organisations, including Welsh Government. I would be keen to be involved in any update of the statutory guidance by Welsh Government.

Guidance from my office: Alongside the statutory guidance, my team and other supporting organisations in Wales have produced resources and frameworks that support implementation of the Act including: Future Generations Reports; the Ways of Working Progress Checker; journeys towards the well-being goals; frameworks for project, service design and scrutiny; long-term and futures guides; and e-learning modules. We also provide advice to public bodies and, where capacity allows, the voluntary and private sector on applying the Act. For example, we have recently produced a business toolkit.

In 2024/25, we recorded 882 requests for our advice and assistance, a 9.4% increase compared to the year before. 46% of these were from public bodies with duties under the Act. My team receive excellent feedback for the support they provide. Our learning and development sessions have received feedback scores of 6.4 out of 7, with a 100% of attendees reporting improved confidence in applying the Act.

5. How far the Act has been legally binding and enforceable

Current situation:

There are no specific enforcement mechanisms in the legislation as it stands. This was done by design and voted upon by the Senedd.

This means that judicial review applies by default. This is a difficult and costly procedure. It might also mean that only a class of people rather than individuals can use it. I understand that none of the very few attempts to use the Act in judicial review have obtained permission from the court to proceed.

There are specific duties in the Act in addition to the general duty which might be better ground for challenge (e.g. the duty to take all reasonable steps to meet well-being objectives).

The Public Services Ombudsman could hear, as I understand it, complaints about the non-compliance with the Act as maladministration, but only if the person could demonstrate personal injustice. This could prove difficult given the nature of the Act's duties.

The role of the Commissioner is designed in the Act to be a promoter not an enforcer. This means that I promote a principle, the sustainable development principle, and help it to be implemented by providing advice and making recommendations. This is the weakest type of Commissioner role.

This is different from the Welsh Language Commissioner, which is set up as a regulator setting standards, checking compliance and sanctioning breaches. A specific tribunal was also created. The Older People and Children's Commissioners are set up as champions of the rights of specific population groups and the Commissioners can support individuals directly to help protect their rights. This supposes that rights are set in law in the first place. The WFG Act does not create rights for future generations or current generations so that model could not apply (but perhaps it could be explored how the new United Nations Declaration on Future Generations could help support this model now it has been adopted).

Possible changes:

The WFG Act is a people's act, and this is why I see value in seeking to amend the legislation to ensure that people have access to easily accessible and affordable redress mechanisms or through the creation of rights (if devolution boundaries allow it or by working with the UK Parliament).

My team worked with the UK Parliamentary drafting team for [Lord Bird's Bill](#). We offered some solutions but recognise the challenges devolution boundaries cause in relation to justice issues in Wales and that the Senedd may not be able to create similar provisions (see clauses 30, investigations, 31 Applications to court, 32 Proceedings and 33 Judicial remedies).

The Bill gives a clear power to individuals to bring proceedings against a public body or to bring a case to the Commission for them to decide if they want to start an investigation.

The Bill created a power to conduct investigations in addition to the review powers similar to the Welsh Act, where the Commission can conduct an investigation if they suspect that a public body has failed to comply with its duties. If a failure were recognised, the Commission could apply directly to the High Court to mandate compliance with the recommendations or other actions chosen by the Court.

Granting us such a power would create significant additional responsibilities for my office through investigation, case management, enforcement policy and resourcing. It would also change the premise of my relationship with public bodies which is based on trust and support rather than fear of sanction.

The powers of the Public Services Ombudsman could alternatively be amended to extend their existing remit to help with the enforcement of the WFG Act.

I have already mentioned amending my review powers to give them more teeth. They could be extended to allowing me to review individual decisions (giving me a case work function)

but without proper resourcing it would detract our work and support to drive change.

The Information Commissioner in connection with Freedom of Information Act 2000 could be another model to explore. They can publish decisions which require compliance, or risk contempt.

Using the model of the Welsh Language Commissioner is another option. They have the strongest enforcement powers of Commissioners in Wales. Some of my advice, for example the Maturity Matrix, already shows some similarities with the Welsh Language Standards.

Importantly, I wanted to stress the preventative nature of the Act which needs not to be lost in discussions about enforcement. The WFG Act was designed to improve administrative practice and stretch organisations—to challenge the status quo and encourage long-term, joined-up, preventative approaches to Wales’ most complex issues. In doing so, it represents a different kind of legislation—one that drives positive behaviours, innovation and shared responsibility rather than compliance through sanctions. It is about preventing harm not compensating for harm done. This is a key feature that needs to be protected whatever enforcement mechanism is chosen this time round. The legislation needs to continue drive change upwards and not be dragged downwards or be distracted by litigation which risks stifling innovation.

I look forward to hearing the views of the public, witnesses, and the Committee on the issue of enforcement.

6. How far the Act has represented, and will continue to represent, value for money

The WFG Act enables a longer-term, preventative approach to policy and public spending, which drives better outcomes and greater efficiency over time.

In his recent report [‘No Time to Lose,’](#) the Auditor General for Wales makes the value for money case clearly. He says: *“I urge public bodies to see the sustainable development principle as a value for money issue. We cannot afford to design solutions that do not meet people’s needs, burden future generations with avoidable higher costs, or miss opportunities to deliver more with the same or less.”*

The case for spending on prevention is unquestionable. For instance, Public Health Wales says that putting in place effective programmes to prevent poor health offers great value for money: “Prevention initiatives such as early years education, vaccination programmes, smoking cessation and support for carers can deliver excellent value for money - with an average return of £14 for every £1 invested in them. They also keep people healthier and address inequalities as well.”

Other public sector organisations will have similar compelling statistics about prevention. In fact, all the five ways of working provide value for money. For example, if we consider long term trends when building schools and hospitals, we can ensure these facilities are future

proofed, limiting the need to make adjustments in years to come.

There are good examples across public bodies of the value for money that is achieved by Act. However, value for money is not considered systematically.

A key finding from the Auditor General's report is: *"Public bodies also need to improve the information they use to inform planning and decision-making, get a better grip on resource implications, and make sure they can understand impact. These are key to achieving and demonstrating value for money, and to applying the sustainable development principle."*

While there is no framework that provides an overall picture of the extent that the Act represents value for money, the theory and examples from public bodies of the value for money provided by the Act make the case unequivocal.

Concluding remarks

As part of its inquiry, the Committee may want to consider the issue of resources. In July 2023, the Senedd's Public Accounts and Public Administration Committee Review of the Welsh Commissioners made a recommendation (number 15) that "Welsh Government conducts post-legislative review of the legislation governing all Commissioners, including a review of the funding allocated to them, with an update provided to the Committee in due course". The Committee may want to consider this matter of funding given how relevant it is to many of the response in this submission relating to the impact of the WFG Act.

Finally, I urge the Committee to model good practice in involving citizens in the deliberations of this inquiry. Given the way in which the WFG Act was developed following the national conversation 'The Wales We Want,' and given that involvement is one of the five ways of working, it is important you hear from a range of people and organisations as part of the inquiry. Citizens have a stake in this legislation in a way that you do not see with other laws and I know there is significant interest in providing you with evidence.

I look forward to meeting with the Committee to expand on these points and share further insights from my work and from the Future Generations Report 2025. I am committed to working with you as much as required in your work to ensure the WFG Act is a powerful and practical tool for shaping a better future for Wales.

In the meantime, if you require any further information, please let me know.

Yours sincerely,



Derek Walker
Future Generations Commissioner for Wales

Senedd Cymru | Welsh Parliament

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol | Equality and Social Justice Committee

Ymateb gan: Sefydliad Materion Cymreig | Evidence from: The Institute of Welsh Affairs



IWA Consultation Response: Senedd Equality and Social Justice Committee

Well-being of Future Generations (Wales) Act 2015: Post-legislative scrutiny

Introduction:

The Institute of Welsh Affairs is Wales' leading think tank, independent of government and political parties. By bringing together experts from all backgrounds, we conceive ambitious and informed ideas which secure political commitments to improve our democracy and our economy.

We provide platforms for debate, opportunities for people to make their voices heard and agenda-setting research. We are funded by our members, income from our events and training sessions, and supported by trusts, foundations and other funding bodies. We are a proud signatory to the Zero Racism Wales pledge, a Living Wage employer and hold NCVO Trusted Charity Mark Level One.

Our vision is to create a Wales where everyone can thrive.

The IWA is a registered charity in England and Wales: 1078435 and a company limited by guarantee registered in England and Wales: 02151006.

The IWA has long been an advocate for the Well-being of Future Generations Act (henceforth 'the Act') as a means to create a Wales which places improving wellbeing over the long-term at the centre of the nation's approach to policy and public service delivery. We have supported and worked alongside both Commissioners (to date) and his Office itself. We have also been a politically independent platform to champion the Act as well as for those who critique it to ensure it delivers the best outcomes possible.

In the lead up to the publication of the Commissioner's Future Generations Report,¹ the IWA worked on a number of internal policy research projects which helped to support the drafting of the report and its recommendations.

Particularly pertinent for the purpose of the Committee's scrutiny is a report² we produced for the Commissioner, analysing the wellbeing objectives and steps included in all public bodies' wellbeing plans (which are statutory obligations). The analysis, alongside some of the recommendations we made to the Commissioner, forms the basis of our response (although we are unable to speak to the direct findings of the report).

Finally, whilst we are glad that the Committee is undertaking scrutiny of the Act, we state at the outset that Welsh Government should commission a broad statutory review of the implementation of the Act to understand barriers to delivery and means to strengthen it for the future. The Auditor General has called for such a review since 2020.³

¹ [Future Generations Commissioner for Wales, 2025, Future Generations Report 2025](#)

² Note - we are unable to reference the findings of the report directly, due to it produced for an internal purpose by use of the Commissioner's office

³ [Audit Wales, 2025, No time to lose: Lessons from our work under the Well-being of Future Generations Act](#)

Wales is justifiably proud to be the first nation in the world to legislate to act in the interests of future generations. Our response is intended to ensure that the mechanisms to enable this to happen are in place. Included are key arguments for making efforts to strengthen the Act in the 7th Senedd.

Achievements

The Wellbeing of Future Generations Act is intended as a long-term behaviour change mechanism for public bodies who fall under its remit (which has, over time, expanded to cover 56 public bodies). Behaviour change in that it is intended to change the way that public bodies deliver their services, allocate resources and plan for the future. The Act has motivated a coalition of support from public bodies across Wales, who are proactively seeking to deliver in accordance with the Act and further best practice.

As such, it is a real achievement that the Act now frames much of the way that public bodies understand their remits and deliver their services. Public services are changing and this is promising, as this is the overarching purpose of the Act.

The Act is also having an impact on organisations who don't fall under its remit, including those in the private sector. Organisations like Principality,⁴ Wales and West Utilities,⁵ Bluestone⁶ and the FAW⁷ are just a few examples of businesses who have incorporated the Act into their strategies and activities, attempting to apply the five ways of working and the seven well-being goals. Whilst this is beyond the scope of the initial purpose of the Act, it displays the broader impact that it has had on changing the conversation in Wales. That the Commissioner's Office has produced a 'Toolkit for Business'⁸ also displays the wider impact the Act is seeking to have, beyond its primary purpose (this is supplemented by other organisations also attempting to translate the Act for application in the private sector⁹). Regardless of whether or not this should be an evolving area of focus of the Commissioner, the fact that the private sector is beginning to engage with the Act represents a sense of its perceived value and importance. It also acknowledges that engendering buy-in from organisations beyond the Act's remit will be vital for accelerating delivery and supporting the progress on long-term wellbeing goals.

We are also seeing newer Corporate Wellbeing Plans (and other strategies with similar purposes) starting to show a deeper understanding of how they can deliver in accordance with the Act. This is evident in the most recent round of Local Authority plans which are more comprehensive than their predecessors, especially when it comes to outlining how they will practically deliver their wellbeing objectives and steps. This shows that public bodies' awareness of how to apply the Act in their context is improving and *should* continue to improve over time.

All of the above speaks to the strong awareness raising, communications and external affairs efforts of the Commissioner's Office, which has effectively shifted the national conversation.

⁴ [Principality. 2024. Future Generations Fund](#)

⁵ [Wales and West Utilities. 2023. Sustainability Strategy](#)

⁶ [Bluestone. N.D. Sustainability](#)

⁷ [Football Association of Wales. N.D. The wellbeing of future generations](#)

⁸ [Future Generations Commissioner. 2024. Well-being of Future Generations Act: Toolkit for Business](#)

⁹ [Cynnal Cymru. 2023. The role of business in supporting future generations](#)

Public bodies, broadly speaking, are talking in the language of the Act. That this is the case is not inevitable, but represents an achievement. The task ahead is to translate intention to delivery.

Wales has also achieved significant soft power benefit from the Act on a UK and international stage. Globally, Wales was first to move to incorporating the UN Sustainability Goals into domestic legislation. As such, Wales has genuinely been a global pioneer. We have therefore seen international interest in replicating the Welsh approach by other nations as well as by Supranational Bodies.¹⁰ This impact is valuable in raising Wales' international profile. This is the area which has arguably seen the biggest achievements, whether that represents the priority of the legislation or not. Wales has set the terms for a global conversation on acting now for the benefit of future generations.

Whether or not this translates to public knowledge of the Act or its intentions is a harder criteria to measure and certainly would be a useful area of research enquiry in the future. The Act has made real progress in furthering the *collaboration* way of working, creating structures for dialogue between public bodies and external organisations and individuals. Yet, the *involvement* way of working is less clearly being implemented. Looking ahead, a focus on meaningfully involving citizens in how public money is spent, services are delivered and enacting communities' priorities, is sorely needed.

The achievements that the Commissioner's Office itself has pointed to as examples of the Act's impact include: the free school meals policy, the higher bar Welsh Government now places on road building, and elements of the Curriculum for Wales.¹¹ The challenge comes when analysing the extent to which these progressive changes (and others) happened *because* of the existence of the Act or not. This makes analysing the progress the Act has made complex and multifaceted.

Crucially, scrutiny of the Act and its achievements should acknowledge its purpose, remit, budget and powers. In public discussion in Wales, the Act is often discussed as a panacea for all of Wales' challenges. It is not so, and is not intended to be so. It is also not *responsible* for the continuing nature of the nation's systemic challenges. As such, we hope that the Committee's scrutiny of the Act is cognisant of this - holding the Act to such a high bar that it is impossible to deliver against.

Analysing the delivery of the Act

As part of the IWA's recent work with the Commissioner we have outlined some broad findings from analysing the wellbeing objectives and steps of public bodies strategies.

The Act requires public bodies to deliver according to five *ways of working* to achieve the seven well-being goals: long-term, integration, involvement, collaboration and prevention.

Our analysis found significant variance in the application of the different ways of working across our public bodies. Involvement and integration are the least frequently applied principles evident in their wellbeing strategies. This suggests that public bodies are still on a journey in delivering against the ways of working, especially those that have a higher bar to implement.

¹⁰ E.g. [United Nations. 2024. Declaration on Future Generations](#)

¹¹ [Future Generations Commissioner. N.D. Our Impact](#)

This is also the case with the alignment of public bodies wellbeing objectives and steps and the seven wellbeing goals. The least present goals evident were *A Globally Responsible Wales* and *A Wales of Vibrant Culture & Thriving Welsh Language*. That both of these are not the *primary purpose* of many public bodies raises the question of the degree to which public bodies are looking to deliver beyond their specific silo when making their strategies.

Whether or not the Act makes public bodies deliver differently, or whether it merely changes the way they communicate their ongoing work, is, therefore, unclear. Being aware of ‘*future-generations washing*’ - that is, speaking in the vernacular of the Act, whilst continuing to deliver in a manner which undermines it, is vital.

We also found little in public bodies’ strategies which took into account the *missions* or *focus areas* presented in the Commissioner’s 2023 *Cymru Can*¹² strategy. This could be because the timing of *Cymru Can* doesn’t necessarily align with public bodies publishing their strategies. It is published at a time which is more relevant for the Commissioner’s term of Office than corresponding to any particular periods relevant to public bodies. As a result, it is difficult for public bodies to take the strategy into account as they have already planned for their long-term commitments.

The timescales on which public bodies make their strategies, and corresponding wellbeing objectives and steps, vary significantly. Different public bodies are constantly publishing strategies, outlining wellbeing objectives which speak directly to the Act. This variance will only become further entrenched as new public bodies fall under the remit of the Act. This presents significant challenges for the oversight and scrutiny the Commissioner’s Office can practically undertake. They are not necessarily informed when new wellbeing objectives are made and there is no obligation on public bodies to involve the Office when drafting them. The periods that public bodies’ strategies and goals cover also vary greatly, with some covering over a decade, where others cover five years or less (in some cases due to political cycles). These misaligned timescales could have a significant impact on the Commissioner’s Office’s ability to influence policy delivery. For example, how are public bodies to take into account recommendations from *Cymru Can* and the *Future Generations Report* when they have already committed to strategies and goals which, in some cases, last until 2035? There are structural solutions to the Act which can alleviate this challenge.

Another challenge to scrutiny and accountability is that there is no shared or established terminology that governs public bodies’ wellbeing strategies. They are called different things and are written in completely different ways. Some use the terminology in the Act (as in, wellbeing objectives and ways of working), whilst others do not.

From an external point of view, it is also difficult to analyse the impact of supporting architecture put in place in the Act, such as Public Services Boards (PSBs).¹³ It is not particularly clear what their purpose is or indeed what they have achieved. More can be done

to uncover what best practice looks like for PSBs.

¹² [Future Generations Commissioner, 2023, Cymru Can](#)

¹³ [Welsh Government, N.d., Public Services Boards](#)

There are also significant gaps between well-intentioned wellbeing goals and steps, but relatively poor focus and detail on how they will be effectively delivered. Targets without the steps to achieve them are largely ineffective. There is therefore a need to further drill down into the detail of how public bodies practically deliver wellbeing-focussed policies.

A related issue is on the analysis metrics which underpin reviewing the performance of public bodies' wellbeing goals and steps. The robustness of the analysis metrics varies greatly. This again presents challenges for how ambitious goals are translated into implementable policies which make a tangible difference. If the public can't tell whether a stated wellbeing objective is hit or not, this can erode confidence in the Act as a vehicle for change.

Finally, there is not much evidence that public bodies are embracing a culture of long-termism in their delivery of public services. Public bodies which demonstrate some long-term thinking approach, invariably do not look beyond the mid-2030s. Consequently, they do not attempt to engage with the longer term challenges such as but not limited to climate change. This is in contrast to the example set by the National Infrastructure Commission for Wales,¹⁴ who have started to look ahead to 2100 in their activities,¹⁵ resulting in a completely altered perspective to their remit. This is long-termism and future generations thinking in practice.

Improving the effectiveness of the Act

One of the key improvements to the Act would be **strengthening its enforcement**. This is a point we come back to in a later part of this response.

As alluded to above, establishing **clear timescales** for when public bodies are expected to update their wellbeing objectives, steps and wider strategies would be greatly beneficial. To be practicable, such a system could run in co-horts of different organisations.

More focus and emphasis is required on **delivery** of the Act. Wellbeing objectives and steps are a key part of how the Act functions. Yet, examining how they are practically and tangibly delivered is the necessary next step.

We should, therefore, continue and even increase the practical support for public bodies to draft and deliver their wellbeing objectives and the ways of working. This is critically needed in developing and **delivering a set of impactful, time-bound, realistic analysis metrics and steps**.

Additionally, the inflexible funding arrangements for public bodies runs counter to the approaches required of them by the Act. This is particularly clear in **the need to shift to more preventative spending**, particularly in the health system. Public bodies (and Welsh Government) have been as yet unable to have long-term funding certainty to deliver long-term goals. Wales' funding mechanisms constrains the Act's delivery and alleviating this constraint would enable public bodies to truly plan for the long-term.

¹⁴ [National Infrastructure Commission for Wales](#)

¹⁵ [National Infrastructure Commission for Wales, 2025. Annual Report 2024](#)

It is important to note the widespread constraining factors which undermine public bodies' delivery against the Act. The lack of long-termism or investment in preventative spending is unsurprising given the financial position of many public bodies across Wales. The lack of certainty provided over their long-term budgets inhibits their ability to deliver strategic, ambitious and long-term policy. The funding challenges currently experienced by public bodies, especially the case in local authorities mean a retrenchment to delivering for the short-term, rather than the long-termism enshrined in the Act. Short-term delivery puts the responsibility of solving our problems today onto the shoulders of future generations.

Review and reporting

Firstly, we have yet to see a post-legislative review of the Act, despite this being recommended by the Auditor for Wales since 2020.¹⁶ It is disappointing that a comprehensive review of the Act has not taken place sooner. If the Act is to live up to its aspirations, it should sit at the centre of our national conversation. Not placing a review as a priority, is therefore a concern.

This is worrying and suggests that we are failing to ensure that barriers to implementation of the Act are identified and alleviated in good time. We would recommend ensuring that Statutory reviews take place at least to coincide with the Commissioners' terms (seven years).

There is also a risk, given the functional nature of the Act on public bodies, that we fail to continue to engage the public in conversations around the Act and its underlying principles. The Act resulted from the *Wales we Want* national conversation. 10 years on, it is not clear how engaged the public are on this ongoing long-term journey. There is therefore a risk of the Act being a very 'policy-centric' conversation rather than one which engages directly with people and communities across the whole of Wales. The Act needs to be something delivered *with* rather than *for* or *on behalf of* communities.

For such an important piece of legislation, with such a broad remit, more scrutiny is needed on the Commissioner and their Office. Such scrutiny has a role in driving better delivery.

Enforceability and legal basis

As noted above, one of the key challenges evident from the first 10 years of the Act is undoubtedly the lack of enforcement mechanisms. This sits at the heart of its criticisms and the discourse around its achievements, or lack thereof.

The Act needs to be strengthened by providing some form of actionable enforcement mechanisms. The Act currently 'requires public bodies to consider the long-term impact of their decisions, work collaboratively with people, communities and each other, and take action to prevent persistent challenges such as poverty, health inequalities and climate change.'¹⁷ It's a 'legally-binding common purpose' that provides 'the ways in which specified public bodies must work, and work together to improve the well-being of Wales.'¹⁸

If public bodies do not, there is little meaningful enforcement the Office can undertake.

¹⁶ [Audit Wales, 2025. No time to lose: Lessons from our work under the Well-being of Future Generations Act](#)

¹⁷ [Future Generations Commissioner for Wales, 2025. Future Generations Report 2025](#)

¹⁸ [Welsh Government, 2015. Well-being of Future Generations \(Wales\) Act 2015: the essentials](#)

The Act gives the Commissioner the opportunity to conduct section 20 reviews of public bodies. It has, to date, rarely used this power. On the occasions that it has, it's unclear whether it has led to any change.

In any case, the Commissioner's Office has neither the capacity nor resources to conduct any significant number of reviews. Staff members also want to cultivate *coalitions of the willing* in regards to the Act. Conducting a review of obstructive public bodies would run counter to this intention and approach.

This 'all carrot, no stick' approach *may* work for some public bodies, who proactively deliver against the Act, but it won't work for *all*.

If the Commissioner is expected to take on enforcement, they would need the resource, capacity and expertise to do so. Similar capacity, resource and funding constraints have undermined Natural Resources Wales' ability to undertake its enforcement remit.¹⁹ If we want an impactful Act, we need to resource it as such.

The lack of any meaningful enforcement mechanism undermines public confidence in the Act. Primarily because they see activities undertaken by public bodies which are in direct contravention of the Act and nothing is done to challenge it. Indeed, when the Commissioner calls for change in an area of policy, it often goes unheeded.

There are, therefore, practical steps that could improve the enforceability of the Act, and we would recommend that such steps be the focus for the next Senedd.

Value for money

It is difficult to ascertain the value-for-money of the Act, especially given its long-term focus. It is not necessarily envisaged to deliver immediate results, rather intending to transform public service delivery over the long term.

Adequately assessing whether the Act delivers value for money is an area which requires more scrutiny. Additionally, there is a need to scrutinise where resources within the Office are being spent and how this leads to outputs. Audit Wales would be in a good position to undertake this work as are the Public Accounts Senedd Committee.²⁰

Overall, there is a need for better analysis of the impact of the Act, in order to help it to deliver on its transformative potential.

Summary

The IWA looks forward to following and contributing to the scrutiny of the Act. We hope that drafting a Committee report, based on the input of individuals and organisations across Wales, can lead to a strong set of recommendations on which to improve the implementation

¹⁹ [Senedd Climate Change, Environment and Infrastructure Committee, 2025. Natural Resources Wales: Annual scrutiny 2024-25](#)

²⁰ As per, [Senedd Public Accounts and Public Administration Committee, 2024. Scrutiny of Accounts:](#)

[The Future Generations Commissioner for Wales 2022-23](#)

of the Act in the future. We would welcome the opportunity to expand on our response above, in whatever capacity.

Evidence submitted by: Joe Rossiter, Co-Director of the IWA

Senedd Cymru | Welsh Parliament

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol | Equality and Social Justice Committee

Ymateb gan: Gwasanaeth Natur Cymru | Evidence from: Nature Service Wales

Written Evidence to the Post-Legislative Scrutiny of the Wellbeing of Future Generations Act

Submitted by: Daniel Lock, Director – Nature Service Wales

Email: [REDACTED]

Introduction

Wales has been internationally recognised for its leadership in adopting the Wellbeing of Future Generations Act. However, there remains a significant gap between the ambition of the legislation and its consistent implementation – particularly in relation to the protection and restoration of the natural environment. In contrast to the principles of the Act, Wales is one of the most nature-depleted countries in the world, and despite clear statutory commitments, Wales continues to experience critical declines in biodiversity and ecosystem resilience, and is not on track to meet its nature recovery targets. This reflects an ongoing failure to address the underlying systemic drivers of environmental degradation, and a lack of coordinated, long-term ambition across sectors.

While this is considered a failure to live up to the ambitions and principles of the Act, the Act itself has provided a blueprint for designing the solutions. The development of Nature Service Wales has drawn directly on the principles of the Act to build enabling infrastructure that addresses underlying systemic issues and supports implementation – offering a practical mechanism to help realise the Act’s objectives in relation to nature, climate, skills, and equity of opportunity to engage.

Nature Service Wales

Nature Service Wales (NSW) is a national initiative established to help build the enabling infrastructure needed to deliver a whole-of-society response to the nature and climate emergencies. Through establishing a recognisable, collective identity and platform for coordination, collaboration, and the creation of more visible and accessible pathways into volunteering, education, training, and green careers, NSW seeks to make it easier for people of all backgrounds to contribute meaningfully to nature recovery and the long-term climate resilience and wellbeing of Wales.

While still in its development phase, NSW is being established to embody the ambitions and principles of the Wellbeing of Future Generations Act, which have acted as a

template and guide for its development. It is designed explicitly to address systemic barriers to collaboration, involvement, prevention, long-term thinking, and integration – each of which is essential to the delivery of Wales’s wellbeing goals.

Nature Service Wales as Case Study

The Wellbeing of Future Generations Act has provided both a framework and a rationale for the development of Nature Service Wales. Its long-term, preventative, and collaborative focus has helped shape how NSW is being built – from the emphasis on shared goals across sectors, to the effort to mobilise and coordinate partners, including public bodies, around a common purpose. In this context, the Act has not only inspired the work of NSW, but also offered a practical foundation for delivering. The following points are offered as something of a case study, reflecting how the Act has shaped NSW’s development, and how NSW is actively supporting or exemplifying key aspects of the Act, including a selection of the Future Generations Report 2025 recommendations.

1. Collaboration – simplifying the partnership structures around the WFG Act

Nature Service Wales is an example of collaboration in action. It has brought together over 100 stakeholders from across Wales – environmental NGOs, public bodies, education providers, community groups, and others – to create shared vision and alignment around the role of people, skills, and opportunities in nature recovery.

NSW acts as a coordination platform rather than a delivery body, helping to amplify and connect existing initiatives, rather than adding new layers of duplication. It offers a unifying, recognisable identity that helps align the efforts of many around a common purpose. This approach is a practical response to the fragmentation that often limits both engagement and cross-sector working in Wales.

2. Involvement – ensuring the legislation levers in better involvement of the public in decision making

At the heart of NSW is the principle that everyone in Wales should be able to take part in nature recovery – whether through volunteering, education, community action, or employment. Our commissioned research has focused on understanding how young people engage with nature-based work and what barriers they face.

Key findings include:

- Young people often lack access to local opportunities and rely heavily on motivated adults or gateway organisations.
- There is a widespread lack of understanding about nature-related career pathways or how to get involved.

These insights are helping to shape a more inclusive and accessible national system, ensuring that involvement in nature recovery is open to the already-informed or already-involved. NSW is therefore helping to lay the groundwork for more equitable and

meaningful public participation.

3. Prevention – shifting investment towards preventative approaches

Nature Service Wales frames nature recovery and community engagement as preventative action. A more ecoliterate, connected and skilled population is better equipped to reduce pollution, mitigate biodiversity loss, adapt to climate change, and sustain healthier communities. A more informed and ecoliterate population is also more likely to support associated policies and action.

By mapping education and training provision, supporting the development of career pathways, and increasing visibility of nature-based work, NSW is helping to build the capacity needed to deliver on environmental and social outcomes before problems escalate – reducing future demand on health, economic and environmental systems.

4. Long-term – embedding a long-term lens across the public sector

NSW was established with a long-term horizon in mind. Its focus on workforce development, community involvement, and systemic infrastructure reflects the understanding that nature recovery is generational work. NSW aims to ensure that the social foundations – skills, knowledge, and public will – are in place to support Wales’s ecological recovery for decades to come.

This approach aligns fully with the WFG Act’s call for public institutions to consider long-term impact and legacy, not just short-term results.

5. Integration – embedding the Act across the corporate areas of change

Nature Service Wales supports integration by working across multiple wellbeing goals simultaneously, including:

- **A resilient Wales** (through ecosystem restoration, ecological capacity-building, building support and understanding for nature-based solutions),
- **A healthier Wales** (through nature-based engagement and wellbeing benefits),
- **A more equal Wales** (by creating more visible and accessible entry points and career pathways), and
- **A prosperous Wales** (through facilitating green job creation and skills development).

NSW helps embed the spirit of the WFG Act by providing a joined-up, cross-sectoral mechanism for aligning education, environment, skills, and community development.

On Value for Money and System Change

While still in its development phase, Nature Service Wales has already delivered strategic research, convened national conversations, and begun mapping the fragmented systems that currently limit participation and workforce development. It is positioning itself not as another delivery project, but as the infrastructure that helps existing work go further, faster, and more coherently.

In that sense, NSW is a value-for-money investment – designed to improve system efficiency, reduce duplication, and amplify the impact of others.

Conclusion and Recommendations

The Wellbeing of Future Generations Act provided the framework for Nature Service Wales to be developed as a cross-cutting, long-term and preventative response to the nature and climate emergencies. It offered the mandate for systems thinking, collaboration, and long-term investment in the people, skills, and opportunities needed to drive nature recovery and support the wellbeing goals. But if the ambition of the Act is to be realised in practice, these kinds of enabling approaches must be recognised, supported and integrated into policy and delivery.

To that end, the following actions are recommended:

- 1. Recognise and strengthen enabling infrastructure like Nature Service Wales**
Welsh Government should formally recognise Nature Service Wales as a national enabler supporting the delivery of the WFG Act, Environment Act, and Nature Positive targets – providing core investment to help grow sector capacity, visibility and public participation.
- 2. Embed investment in ecological literacy and skills as preventative action**
Improving public understanding of nature, ecosystems and climate resilience is a critical long-term intervention. Welsh Government should explicitly frame investment in ecoliteracy, community capacity and skills development as part of the Act's preventative duty – empowering communities to contribute meaningfully to national goals.
- 3. Support the roll-out of a Natural History GCSE as a long-term investment in ecological understanding**
Inspiring ecological awareness from a young age is key to building a society ready and able to restore nature. Continued commitment to the development and delivery of a Natural History GCSE would represent a meaningful long-term preventative intervention aligned with the WFG Act's goals.
- 4. Strengthen delivery mechanisms for biodiversity and ecosystem resilience**
Clearer accountability mechanisms are needed to ensure that public bodies deliver measurable outcomes for nature recovery. Public body duties under the WFG Act should be more explicitly aligned with biodiversity and ecosystem targets under the Environment Act.
- 5. Develop a national workforce strategy for nature recovery**
The transition to a nature-positive Wales requires a planned and supported workforce. A national nature recovery workforce strategy – developed with public sector, education and third sector partners – should be established to ensure the right skills and career pathways are in place to deliver on national priorities.

6. Improve integration and collaboration between public bodies and delivery partners

Public service boards and local authorities should be supported and incentivised to work more closely with third sector and community-based delivery partners. Mechanisms like Nature Service Wales provide an ideal platform to strengthen this collaboration in line with the Act's goals.

7. Introduce clear guidance and reporting on public body contributions to nature recovery

Revised guidance should clarify the role of all public bodies – not just environmental ones – in supporting nature recovery, including through procurement, workforce development, education, skills and public engagement. Reporting mechanisms should be introduced to track and support this contribution to nature recovery under the WFG Act.

Senedd Cymru | Welsh Parliament

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol | Equality and Social Justice Committee

Ymateb gan: Cymdeithas Chwaraeon Cymru | Evidence from: Welsh Sports Association

Post Legislative Scrutiny of the Future Generations Act

Introduction

The Welsh Sports Association (WSA) is the independent membership body for the sport and leisure industry in Wales, charged with the task of providing leadership, advocacy and a gateway to business & governance services for the sector.

The WSA understand the 'sport & leisure industry' to mean anyone involved in the business of sport and leisure in Wales.

As the collective voice for this sector in proactively advocating and influencing key decision makers, the WSA also enable members to become stronger, more successful and sustainable through providing a wide range of business support services. As of today, we have 147 member organisations, ranging from National Governing Bodies of Sport to small charities, education institutions and Local Authority leisure providers.

Sport and Leisure and the Future Generations Act

The Sport and Leisure sector has by and large responded well to the Future Generations Act. The Vision for Sport in Wales¹, created by Sport Wales in partnership with the sector places the wellbeing of future generations at its core. This has since been reflected in the strategy of Sport Wales² and a significant number of publicly funded sporting organisations refer to the Future Generations Act within their organisational strategies, for example the Football Association of Wales.

Crucially, most public funding of sport and leisure – channelled to the sector through Sport Wales – places the ongoing participation of children and young people at its heart. Sport Wales funding is primarily driven by the results of the School Sports Survey³, run around every four years. The survey tracks participation and latent demand and attempts to allocate funding accordingly. This is in recognition that sport and physical activity habits formed in childhood have lifelong positive impacts on individuals and wider society.

In this sense, the Wellbeing of Future Generations Act has been a success within the sport and leisure sector thus far. However, there is still significant additional impact the sector could make in influencing wider behaviours – for instance, around 1 million people participate in sport regularly in Wales - and the sector could be further utilised to encourage positive behaviour in terms of environmental sustainability, community cohesion or the Welsh language amongst others.

Secondly, it is unclear the extent to which the Wellbeing of Future Generations Act has altered decision making processes when it comes to the future provision of public leisure space, most often Local Authority leisure and park facilities. These decisions are often made as part of Local

Government budget processes and are not often fully in control of the sport and leisure sector. Due to austerity, we have seen significant pressure on budgets over the last 15 years – consequently, non-statutory services (including leisure and sport) have been cut and facilities have closed, deteriorated or significantly changed.

Many in the sector would argue that these decisions have often been shortsighted, closures of leisure and community centres, increases to fees and charges to access playing fields etc, or the slow erosion of on the ground sports development teams within Local Authorities have all likely had a long-term impact on rates of participation in sport and physical activity here in Wales. Loss of public space to participate is also extremely difficult and often cost prohibitive to replace.

Due to the budget constraints of the past decade or more, it is difficult to pose a counterfactual – but it would seem apparent that in the face of very difficult financial decisions, too often decision makers have not utilised the Future Generations Act to make truly different choices. Decision makers have too often fallen back on the easier answer of cutting non-statutory services which deliver long term good, to deal with short-term financial pressures.

As we move forward with the Future Generations Act and review its implementation, the WSA and our membership would argue that our sector has significant ability to deliver against the wider wellbeing objectives that is currently under explored. Further funding, from areas outside of the traditional “leisure and cultural services” budget line, could enable sport, leisure and physical activity to significantly increase its contribution to Wales and the wellbeing of future generations.

¹ <https://visionforsport.wales/>

² <https://www.sport.wales/strategy/>

³ <https://www.sport.wales/research-and-insight/school-sport-survey/>



Denbighshire County Council
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28th May 2025

To whom it may concern:

Please find attached the response of Denbighshire County Council officers to the consultation on the Well-being of Future Generations (Wales) Act, being led by the Equality and Social Justice Committee of the Senedd.

As set out in the attached, The Well-being of Future Generations legislation is a crucial and progressive piece of legislation that provides a robust legislative framework that the Council relies on in its decision-making every day.

More than just the delivery of the Act itself, its vision and ethos has brought huge standing to Wales as a country - powerfully demonstrating our leadership in sustainable development to the world, which in turn can feed aspiration among our residents and within our communities.

While the Act has our support, there are some areas its approach can be strengthened to support more efficient and effective deliver of the sustainable development principle and we hope the attached reflections from our experience are useful in guiding the committee's deliberations. We are available to share additional detail should any further information be required.

Kind regards

Robyn Lovelock
Insight, Strategy and Delivery Manager

Well-being of Future Generations (Wales) Act 2015: Post-legislative scrutiny

Questions relating to the Committee's Terms of Reference	Denbighshire County Council - Officer Views
<p>How far has the intended objective of the Act been achieved?</p>	<p>The Well-being of Future Generations legislation is a crucial and progressive piece of legislation that provides a robust legislative framework that the Council relies on in its decision-making every day. More than just the delivery of the Act itself, its vision and ethos has brought huge standing to Wales as a country - powerfully demonstrating our leadership in sustainable development to the world, which in turn can feed aspiration among our residents and within our communities.</p> <p>We understand the objective of the Act is to embed the sustainable development principle into decision-making in Wales, such that future generations in Wales have at least the same quality of life as current generations, and this is to be achieved by requiring public bodies in Wales to prioritize the well-being of future generations when making decisions.</p> <p>As such, this long-term objective of the legislation has clearly not yet been achieved. We are encouraged that the Act is increasingly understood, owned and relied upon by our decision-makers, such that we are confident of progress towards the objective of the Act – the recent escalation of support from the Future Generations Commissioner's office has been welcome in this regard. Considering in more detail how key elements of the act are helping us deliver on the Act's objective:</p> <ul style="list-style-type: none"> • Seven Well-being Goals: the seven Well-being Goals capture directly the areas of concern for our residents, officers and elected members – to the point that our own Corporate plan directly reflects them – uniting our work in Denbighshire towards the Goals and the sustainable development principle. • Focus on Long-term sustainability: As with many public bodies, we have struggled to balance challenging short-

	<p>term priorities in an extremely pressured financial situation against the Act's guidance to work with a longer-term view. However, we are making progress in this area, for example discussing the idea of co-producing with residents and partners a Denbighshire Vision to 2100.</p> <ul style="list-style-type: none"> • Ways of working: In addition to long-term thinking, we are increasingly collaborating across the organisation and with partners, involving residents and stakeholders in our work and integrating our work across the goals and well-being objectives. This is again challenged by the financial situation, but we are encouraged by the Future Generation Commissioner's recommendations around streamlining partnerships and by recent meetings in North Wales with the same commitment. We know we need to do more work on prevention and are looking at how to integrate this work into our transformation agenda.
<p>Views on any action which should be taken to improve the effectiveness of the Act and its implementation, including any specific drafting issues</p>	<p>We consider the intended purpose of the Public Services Board to be essential to strengthening partnership working and delivery of the Well-being of Future Generations Act – that there are no other bodies which facilitate consideration of issues from the diverse perspectives of the member bodies, while they are sitting 'around the same table'. The concept offers a critical systems-led approach to local/regional priorities and to deliver value for money through partnership across the ways of working.</p> <p>While we consider the concept valuable and want to see the body continue, there are several ways we believe the PSB is not effective in its intention as it currently functions:</p> <ul style="list-style-type: none"> • Without power or funding, the Board has little ability to influence decisions which are generally made elsewhere by bodies / partnerships with funding e.g. local authorities, Regional Partnership Boards, Ambition North Wales / CJC etc. • We see this as a particular risk around economic wellbeing in light of the Corporate Joint Committee mandate to lead this area without explanation of how this should sit alongside the PSB's mandate to lead on economic (and social, cultural and environmental) wellbeing. There is further risk that - without agreement on the definition of 'economic wellbeing' - the CJC interpretation of 'economic

	<p>wellbeing' will continue to focus only on economic development and not address the (linked) economic inequality within the region being led by the PSB. Without clarity on the definition, expectations and respective roles, the PSB will be further sidelined in this space.</p> <ul style="list-style-type: none"> • The Act is not sufficiently integrated into nationally-mandated assessments of how public bodies are doing which misses opportunities to recognise achievements and progress implementation. For example, local authority Panel Performance Assessments or Treasury assurance reviews of major projects do not reference the goals, ways of working or other progress in implementation; grant funding does not support the ways of working or require evidence of what has been achieved for the Act. • Well-being Impact Assessments are working well within Denbighshire but we are currently (1) working with project teams to strengthen the evidence provided regarding positive and negative impacts across the goals, particularly on climate, nature and inequality (2) adding a requirement that conclusions and actions from the well-being impact assessment are made explicit and tracked through performance management. • The requirements of the legislation for Well-being Assessments to be completed every five years are not proving as effective as they might be. With wider macro-economic challenges and the economic well-being challenges outlined above, we are not seeing significant change over the five years such that the assessments are likely to be repetitive – while also being a huge amount of work. We would welcome less-onerous ways for the assessment to be completed, or for the PSB to be better resourced to deliver it. <p>We welcome the five yearly report from the commissioner and find the recommendations highly relevant to the times we are experiencing. While we are yet to review them formally, we are concerned how – despite their relevance – how we will implement them within such difficult financial constraints facing the council. On-going funding pressures, plus short-term, prescriptive grants (often at short notice) and legislative requirements limit our ability to adjust course and innovate.</p>
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<p>Are the review and reporting requirements under the Act are being met?</p>	<p>Yes, we are confident that the Well-being Objectives component of the legislation functions effectively. For the past decade, our work has been closely aligned with the well-being goals – notably with our corporate plan 2022-27, with objectives reviewed regularly and reported on across all levels of the local authority.</p> <p>However, it is worth noting that our services have selected other indicators for their progress against our well-being objectives, other than those set out as national well-being indicators https://www.gov.wales/wellbeing-wales-national-indicators</p> <p>Furthermore the Act is well-integrated and regularly referenced within our organisational processes: it is integrated into our decision making through systematic Well-being Impact Assessments, which accompany all major decisions, and are generally completed as a group exercise (building shared understanding and avoiding optimism bias). These assess implications for equalities, socio-economic disadvantage, Welsh language, biodiversity, and carbon impact—ensuring a balanced approach to decision-making that reflects the sustainable development principle and the five ways of working: long-term, prevention, integration, collaboration, and involvement.</p> <p>However, while we are meeting requirements, engagement with PSB Well-being Plans and their annual reports remains limited, e.g. often not referenced in other strategic documents.</p>
<p>Views on the effectiveness of guidance made under the Act</p>	<p>Overall, we welcome the guidance made under the Act, and supplementary guidance provided by the Commissioner’s office. The goals and ways of working set out in the Act provide a hugely helpful framework to lean on in our framing of discussions and decisions – particularly amid such divisive times. It provides a north star that we believe captures the hearts and minds of residents beyond the difficulties of challenging day-to-day decisions.</p>

	<p>However, we find some of the Act overly-prescriptive, particularly the guidance around preparation of the Well-being Assessments.</p> <p>More widely, as an organisation we found the journey tracker helpful and reference the findings as relevant to shaping decisions internally. Similarly we expect the discussions around the recent Commissioner’s recommendations to help shape discussions and decisions.</p> <p>We welcome the increasing support available through the Commissioner’s Office (national training series, offer of tailored support on key pieces of work) which we feel is timely if slightly overdue. There is still scope to build on this as we see a wide range of ownership, interpretation and delivery in how the Act shapes the work of the different services. We also propose that support could be beneficial for those on leadership teams who sit on the many boards regionally (PSBs, CJs, Regional Partnership Boards, corporate leadership teams etc.) with regards how they bring their “well-being hats” to discussions in the different boards, so there is clarity among those leaders about what good/excellent well-being outcomes look like, for example within economic development discussions.</p> <p>At an operational level, our officers have attended a Community of Practice around well-being impact assessments which they are finding valuable, but would appreciate more clarity on the short/longer term aims of the CoP and more consistency in engagement (e.g. meeting frequency, follow-up after meetings etc.) This is an important aspect of public bodies delivering on the Act, and we have a lot of valuable experience to share in this space as well as being keen to learn from others, but think this CoP approach could be improved.</p>
<p>Views on how far the Act has been legally binding and enforceable</p>	<p>As above, we have found it hugely helpful to be able to lean on the Act in framing discussions and decisions.</p> <p>However, the extent to which the Act is proving legally binding and enforceable is less evident. For example, while the Act sets out Goals and measures for lowering carbon (e.g. Prosperous, Responsible) and improving biodiversity</p>

	<p>(Resilient) there are no tools to test whether this will happen from a proposed project or consequences if it is not. We have been involved as a Pioneer Council' in a project with the WLGA that is developing tools to better inform such decisions (building on the Ambition North Wales leadership case study in the national Carbon in Infrastructure guidelines) but this has come from our initiative – not because its legally required to do so. Economic decisions would particularly benefit from better integration of social, environmental and cultural wellbeing considerations to meet the requirements of the act around prosperity (low carbon), resilience and equality – especially with regards construction (low carbon, resilient Wales).</p>
<p>Views on how far the Act has represented, and will continue to represent, value for money</p>	<p>The Act plays a critical role in promoting long-term thinking and already delivers value for money by requiring that decisions consider a wider range of perspectives, current and future impacts. This helps us make better decisions more effectively by reducing re-work, be more efficient by developing projects with multiple benefits, and more be more mindful of equitable outcomes from our work. It is helping embed a mindset towards long-term benefit across our services.</p> <p>That said, we believe there is significant potential to improve the effectiveness of the Public Services Boards (PSBs). We consider the intended purpose of the Public Services Board to be essential to strengthening partnership working and delivery of the Well-being of Future Generations Act – that there are no other bodies which facilitate consideration of issues from the diverse perspectives of the member bodies, while they are sitting 'around the same table'. The concept offers a critical systems approach to local/regional priorities and can help deliver value for money through partnership across the ways of working.</p> <p>While we consider the concept valuable and want to see the body continue, we are concerned that without teeth or funding, the Board has little ability to influence decisions which are generally made elsewhere by bodies / partnerships with funding e.g. local authorities, Regional Partnership Boards, Ambition North Wales / CJC etc. In its current structure, it demands a substantial amount of officer time and capacity,</p>

	<p>which would be fine if it led to stronger decisions – but without funding/power that time is needed on more impactful initiatives amid such a tight operating environment. Although the annual PSB Support Grant provides some assistance, its administrative requirements and restrictive criteria often limit the ability to pursue truly meaningful and innovative projects. In a similar vein, we have participated regionally in the North Wales Insight Partnership as an attempt to coordinate and share resources. The support of the Wales Co-Production Network has been invaluable in the Insight (and wider PSB) work, but remains constrained by lack of resource.</p>
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Senedd Cymru | Welsh Parliament

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol | Equality and
Social Justice Committee

Ymateb gan: Iechyd Cyhoeddus Cymru | Evidence from: Public Health Wales



Briefing to Inform Committee Inquiry - Post Legislative Scrutiny of the Well-being of Future Generations (Wales) Act 2015

Submitted to the Equality and
Social Justice Committee

Public Health Wales

May 2025

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1. Introduction

The purpose of this briefing document is to inform the Equality and Social Justice Committee's Inquiry into post legislative scrutiny of the Well-being of Future Generations (Wales) Act 2015. We see the Act as a genuinely transformational piece of legislation that can unite the collective power, passion and commitment of people across Wales. It embodies the key principles of public health and therefore has served as a key enabler for Public Health Wales.

While much progress has been made over the last ten years, we welcome the opportunity this Inquiry provides to reflect on progress and identify how we can build on the work to-date and accelerate this further in the coming years. In this briefing, Public Health Wales has provided information on:

- ❖ Examples of how we have applied the Act to our work nationally and internationally, as we work together with a range of partners for a healthier Wales.
- ❖ The specific questions raised by the Committee as part of the post legislative scrutiny inquiry into the Act, insofar as we can, as the National Public Health organisation for Wales.
- ❖ Key messages focused on how we can continue to maximise the Act as the underpinning enabling legislation to drive opportunities to increase healthy life expectancy and tackle health inequalities for our current and future generations.

2. Public Health Wales

We are the National Public Health organisation for Wales. Our purpose is working together for a healthier Wales. We help all people in Wales live longer, healthier lives. With our partners, we aim to increase healthy life expectancy, improve health and well-being, and reduce inequalities for everyone in Wales, now and for future generations.

Together, our teams work to prevent disease, protect health, and provide system leadership, specialist services and public health expertise. We are the primary source of public health information, research and innovation, to help everyone in Wales live healthier lives.

By 2035, we will have achieved a healthier future for Wales. We are working towards a Wales where people live longer, healthier lives and where all people in Wales have fair and equal access to the things that lead to good health and well-being.

3. Our case studies

Since it came into effect, we have used the Act and its five ways of working to drive the delivery of key strategic developments and initiatives. Examples of how we have used the Act to shape our work include:

3.1 Long-term thinking

In 2023, we launched our strategy, '[Working Together for a Healthier Wales](#)', which sets out our vision for achieving a healthier future for Wales. We are doing this through the delivery of our six strategic priorities, which are also our

organisational well-being objectives. These are as follows:

- ❖ Influencing the wider determinants of health
- ❖ Promoting mental and social well-being
- ❖ Promoting healthy behaviours
- ❖ Delivering excellent public health services
- ❖ Supporting a sustainable health and care system
- ❖ Tackling the public health effects of climate change

We embraced the Act as the enabling legislative driver for the development and implementation of our strategy. By focusing on the seven well-being goals, it has allowed us to take a long-term preventative approach that utilises futures thinking to focus on threats and opportunities for Wales. Our approach to implementing our strategy is underpinned by the Act's five ways of working, particularly our commitment to involve the public, and collaborate with our partners to deliver integrated and longer-term solutions.

3.2 Prevention

Prevention is at the heart of what we do across the breadth of our services and functions. We deliver evidence-informed clinical and public health services and advice, inform partners on the current and emerging threats to health in Wales, advocate for action to improve and protect health and reduce inequalities, and mobilise partners across Wales to translate evidence into policy and practice at scale to improve population health and well-being and reduce health inequalities.

For example, the *Tackling Diabetes Together Programme* is a collaborative programme that brings together partners from across health and the third sector, with a commitment to reducing the prevalence of type 2 diabetes, along with supporting more people to live well with diabetes. The programme was established following work undertaken by Public Health Wales on the projections of the prevalence of disease in Wales, indicating that by 2035, 1 in 11 people in Wales could be living with Type 2 Diabetes (an increase of 22%).

3.3 Integration

We are working to strengthen and develop the public health system in Wales, focusing on building system leadership capabilities, developing the workforce and enhancing integration across organisational boundaries. This involves working with a range of partners, including health boards, local authorities and the Welsh Government. We are committed to developing a more integrated public health system in Wales that supports joined-up working at a local, regional and national level across all domains of public health. This is reflected in areas such as the work to develop a new All-Wales Communicable Disease Outbreak Control Plan which builds on the learning from the Coronavirus pandemic and helps clarify the respective roles and responsibilities of all the partners to enable a more timely, coordinated and integrated response across the system in Wales.

3.4 Collaboration

Our *Time to Talk Public Health Panel*, which we publish every three months, allows us to monitor and gather information on the public's views on a range of public health issues. The questions are developed through collaboration between different parts of our organisation and with our stakeholders. The findings inform public health work, both within Public Health Wales and partner organisations across sectors. It allows the public to provide regular input into key issues and helps to shape future approaches and areas of focus. It also provides participants with an opportunity to directly identify areas and topics for consideration, which reflects our commitment to ongoing collaboration with the public and our partners.

3.5 Involvement

Our Vaccine Equity Strategy is focused on improving uptake rates for those with protected characteristics. It is focused on understanding inequity in uptake and what can be done to reduce it. This approach has involved collaboration with, and involvement from, communities and a range of partners to better understand people's needs and how we can deliver services that meet them.

4. Committee areas of focus

4.1 How far the intended objective of the Act is being achieved

We have used the definitions set out in Section 2 of the legislation as the basis on which we have interpreted this question. Reflecting on ten years since the Act was passed, we have seen significant positive change at a national level in relation to:

- ❖ providing a strong strategic direction for public bodies in Wales and informing Welsh Government strategies, which are aligned to the ambitions of the Act and enable public bodies to effectively respond
- ❖ changing the nature of conversations in response to the ambitions set out in the Act, particularly around long-term thinking and preventative action.

There are a range of examples and case studies available that demonstrate how public bodies across Wales have embraced the Act to work differently and deliver meaningful improvements to the people of Wales. We have included examples from Public Health Wales' perspective within this response, and a range of other case studies are available, through the work of the Future Generations Commissioner for Wales.

However, implementation to-date has been variable across Wales, as reflected in our responses below. As a result, the Act has not achieved the system-wide change it intended. This is in part, the result of the pandemic which paused some of the work that was in train in beforehand, along with more fundamental system-level barriers. These include short-term funding arrangements, complex partnership arrangements across Wales, differing outcomes measures across sectors, and short-term focused planning and accountability mechanisms.

4.2 Any action which should be taken to improve the effectiveness of the Act and its implementation, including any specific drafting issues

In responding to this question, it is important to recognise the wider contextual changes and societal shifts that have occurred since the Act came into effect. In particular, the pandemic and the cost-of-living crisis have fundamentally impacted on health and well-being, and the priorities facing public sector bodies in Wales. These issues are likely to have led to significant longer-term implications that will affect Wales over the coming years.

Public bodies continue to operate under different planning, accountability and funding arrangements, which can create barriers to embedding the Act. This can be a particular challenge where organisations are seeking to work across traditional boundaries, such as between health and social care, and on issues that are longer-term in nature. This has been at times exacerbated by legislation that may not fully complement the Act, which may be because of the timing of different pieces of legislation preceding the Act.

It would also be helpful to consider if, and how, other recent legislation and regulations support the delivery of the Act, including the Public Health (Wales) Act (2017), Socio-economic Duty (2021) and the Social Services and Wellbeing (Wales) Act (2014). To support local implementation, it will be important to ensure that these are complementary and do not duplicate or add complexity.

Greater alignment and more integrated national frameworks and guidance would help to support the embedding of the Act, which will enable organisations to work and plan more effectively together. An opportunity to do this could be to identify significant cross-governmental issues, such as child poverty, health inequalities, or employability, that require a cross-sector response with clearly defined outcomes that could be shared across different organisations and sectors, that could drive joined-up action. Consideration could be given to how moving towards shared accountability, consistent guidance and long-term funding could support the delivery of the well-being goals and any shared outcomes.

It might also be timely to consider the relationship between Regional Partnership Boards (RPBs) – established through the Social Services and Well-being (Wales) Act 2014, and Public Services Boards (PSBs) and whether any simplification of arrangements could enhance the effectiveness of regional working. Consideration could be given to greater clarity being provided around the role of each partnership, including updating guidance where necessary. In addition, partnership accountability arrangements, including how organisations are held accountable for their partnership work, could be strengthened. There could be a strengthened focus on the collective ownership of longer-term outcome measures.

It is also important to consider the importance of ongoing public involvement and what mechanisms are in place to continue to engage the public around the implementation of the Act.

4.3 Whether the review and reporting requirements under the Act are being met

It is our view that the review and reporting requirements are largely being met, such as the Welsh Government well-being indicators, public body well-being

objectives and PSB well-being plans. However, the impact of this activity is less clear. It is important to consider whether these requirements have 'shifted the dial' to make us more focused on long-term outcomes or whether we have increased the number of reporting mechanisms but remain largely focused on short-term performance measures.

It will also be important to consider how we can ensure that the recent reports from the Future Generations Commissioner and the Auditor General have the impact needed, and that the recommendations are effectively taken forward. There is an opportunity for more focus and emphasis to be placed on the Commissioner's Report recommendations and to ensure they are monitored so that any relevant learning can be shared and built upon.

4.4 The effectiveness of guidance made under the Act

In 2016, a comprehensive suite of guidance documents was published by the Welsh Government to support the implementation of the Act by public bodies, PSBs, and town and community councils. Our experience is that the guidance is simple and easy to use. However, as set out above, the challenge is translating the guidance to system-wide action.

Furthermore, the guidance documents have not been updated since 2016. We would recommend that they are reviewed and updated to reflect the changes that have occurred in the last decade, along with lessons from implementation, societal changes over the last ten years and to reflect other relevant legislation. It might also be useful to reflect on guidance published by other organisations, including Public Health Wales. For example, our Health and Sustainability Hub has published a range of resources to support teams to '[Be the Change](#)' that is required by the Act. We have also undertaken a deep dive into the [Well-being Economy](#).

In addition to the written guidance, opportunities of facilitated peer to peer learning and support is incredibly valuable. While the Future Generation Commissioner's Office provides some support, there could be more opportunities for this across public bodies. The recent recommendations made by both the Future Generations Commissioner and the Auditor General for Wales should inform any further guidance and support that is put in place to support the ongoing implementation of the Act.

4.5 How far the Act has been legally binding and enforceable

We do not feel well placed to assess whether the Act has been legally binding and enforceable. However, from Public Health Wales' perspective we are confident that we have embraced the word, and spirit, of the Act since it was established. Over the last decade, we have adopted an approach focused on embedding the Act and using it as a key driver to help us deliver our strategy and plans, rather than to see it as a compliance requirement. This is reflected in the examples provided and our work both internally and with partners across the public sector.

4.6 How far the Act has represented, and will continue to represent, value for money

As reflected in the recent Audit Wales Report, the Act is fundamental to delivering value for money for the people of Wales. Within Public Health Wales, we have used the Act to drive decisions around key strategic developments and to inform the

wider system over opportunities for delivering value for money. We utilised the Act and our commitment to supporting a 'net zero' Wales to shape our strategic estates programme, undertaken in 2016. This saw us save 132 tonnes of carbon dioxide, divert 41 tonnes of waste from landfill and ensure that over 90% of the furniture used was either repurposed, reconditioned or refurbished.

Our recent report, '[Investing in a Healthier Wales: Prioritising Prevention](#)' provides evidence and a range of case studies showing that investing in prevention can help everyone live longer, healthier lives. The report shows that effective prevention programmes offer value for money and enable the prioritisation of public funding. Prevention can address health inequalities, reverse the nation's health decline, and promote well-being. There is a significant opportunity to utilise key evidence such as this to inform future decisions around system funding and prioritisation.

5. Summary messages

We appreciate the opportunity to engage with the Inquiry and reflect on the implementation of the Act over the last ten years. The Inquiry comes at a time when Wales is facing significant public health challenges. As we have seen, particularly during our response to the pandemic, we can deliver transformational and system-wide change when we harness the collective efforts of public bodies. It is in this spirit that we see the Well-being of Future Generations Act. We must seek to make the five ways of working the norm across, within and between all public bodies. We must build on the examples and learning identified over the last ten years as we seek to move even faster and more fundamentally towards improving the social, economic, environmental and cultural well-being of Wales.

To do so, we need to be willing to address the barriers that remain to enabling these changes. In particular, the move towards longer-term funding arrangements, more outcomes-focused accountability, alignment of guidance and simplification of partnership arrangements are essential. We also need to challenge the cultural barriers that remain and recognise the need to ensure that we develop a workforce that is equipped with the skills to lead and deliver within a complex system. We must ensure we continue to engage with and involve the public. We cannot achieve the benefits of the Act without collectively working with communities across Wales, learning from what works (and what does not) and be willing to reflect on and embrace feedback.

We are committed to a Wales where everyone is supported to live longer and healthier lives, and where good health is the foundation for sustainable communities. Where we are a nation where ill-health is prevented by giving people fair and equal access to the building blocks of health and wellbeing – good jobs, homes and living spaces, and accessible care closer to home – and by tackling disruptors of these building blocks – a changing climate and poverty. The Well-being of Future Generations Act is the legislation that enables this to happen and provides a compass for us to navigate through the challenges and realise the opportunities to achieve a healthy and sustainable Wales



Rhwydwaith
Cyd-gynhyrchu
Cymru | Co-production
Network
for Wales

Senedd Cymru | Welsh Parliament

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol | Equality and Social
Justice Committee

Ymateb gan: Rhwydwaith Cyd-gynhyrchu Cymru | Evidence from: Co-production
Network for Wales

Written Evidence Submission to the Equality and Social Justice Committee Post-legislative Scrutiny of the Well-being of Future Generations (Wales) Act 2015

Submitted by: Co-production Network for Wales

Contact: [REDACTED]

About us

The Co-production and Network for Wales is a community of practitioners who learn, share and improve together. Our vision is of a fairer and more sustainable Wales where everyone has a voice that is heard. We are working hands-on with clusters of Public Services Boards (PSBs) to support the development of their practice of meaningful engagement and involvement, moving towards full co-production as part of our Project Dewi - a 5-year programme funded through the National Lottery Community Fund.

We are submitting this response based on direct, ongoing experience of working with PSBs across Wales. Our role involves supporting public bodies to implement the Well-being of Future Generations (Wales) Act 2015 (the Act), particularly through community involvement, co-production, and culture change. Our insights reflect operational realities, institutional behaviours, and the perspectives of some PSB officers, community partners, and citizens.

We are firmly in support of the Act and its ambition. It remains a globally significant piece of legislation, and we are committed to helping realise its full potential.

1. How far the intended objective of the Act is being achieved.

Observable changes within PSBs:

Project Dewi set out to plant seeds of co-production within the PSB structures with the aim to support them in ensuring that their communities were central to the process of implementing the Act's objectives. During this time we have seen awareness of the Act has increased, and we observe growing willingness among officers to engage in co-production and collaborative working. As part of our Project Dewi, PSB officers across clusters have engaged in training on co-production and involvement. There has also been delivery of a number of one-off or initial co-production initiatives such as the Newborough Community Hackathon (2023) with Gwynedd and Anglesey PSB or youth engagement with Cwm Taf Morgannwg PSB (2024/5).

Integral to these positive changes has been a fostering of a collaborative way of working, building trusted relationships and demonstrating what participatory approaches can achieve. As the leading organisation of co-production and involvement in Wales, we have been able to utilise our wider working relationships and knowledge to enable join up with community groups and other projects that have benefited the work of the PSB. Introduced new approaches to meetings, enabling more productive and purposeful conversations. This cultural change in statutory meeting structures has been challenging for PSB members, but where we have been able to support this change, it has energised the meetings and created new opportunities for building relationships and collaborative working to further the Act's objectives, particularly in embedding the 5 ways of working.

This said, through our engagement with PSB structures across Wales, we have also observed that delivery of the seven well-being goals remains fragmented and involvement, as a way of working, is not consistent within PSB structures. As recognised in the Future Generations Report 2025, which we were pleased to see recommending that more must be done to rebuild trust and foster meaningful involvement.¹ With multiple and competing priorities impacting on the public services, it has been difficult for PSBs to articulate how their activities directly contribute to the well-being goals and commit to embedding a culture of involvement within their ways of working. However participatory practices are crucial to enabling them to identify with, work with and realise with their communities the responses needed to achieve the well-being goals. Citizens want to act on these areas and hold key information into what needs to happen and how it will impact them, public bodies need to be empowered to be bold and operationalise the opportunities they have to involve and work with their communities. Strengthened leadership, clearer communication and more proactive engagement from the Welsh Government could enhance alignment and ensure the intent of the legislation is more effectively realised across Wales.

¹ <https://futuregenerations.wales/cym/wp-content/uploads/2025/05/Future-Generations-Report-2025.pdf>

2. Any action which should be taken to improve the effectiveness of the Act and its implementation, including any specific drafting issues.

Structure and culture of PSBs:

The Act is an ambitious piece of legislation however its complexity has led to many stakeholders feeling it lacks clarity, direction, and enforceability. It can be perceived as a top-down initiative rather than a collaborative process with public services, suggesting that a consideration is needed in how the implementation of the Act incorporates the five ways of working, including Welsh Government's approach to implementation.

Positive cultural shifts are visible (e.g. place-based models in Ceredigion, and health board collaboration in West Wales). Participatory approaches have been brought into PSB meetings and subgroups delivering on their objectives, helping to redesign how they are run and incorporate the ways of working. However there is an overreliance on individuals to drive and maintain this shift, and we have seen that this can easily be reversed when key leaders or chairs change with differing perspectives and priorities. Local authority culture heavily shapes PSBs due to their role in hosting and facilitating meetings. This affects openness to change due to a risk-averse culture. The Act's aspirations will not be realised without encouraging public bodies to take well-managed, shared risks, that enable them to adopt participatory and open practices as standard in their ways of working.

Geography and local identity has shaped the priorities PSB. For example, cultural and linguistic priorities are in West Wales, while inclusion and diversity have greater precedence in the East. These regional distinctions highlight positive opportunities to reflect and allow flexibility for local context however also suggest the need to ensure cross pollination and increasing awareness of areas that may not be as high up on the agenda due to localised assumptions, for example on the diversity of a population. This can be explored effectively through participatory approaches with local communities. For example, our recent Involvement Series event in Aberystwyth, explored how citizens can help realise the goal of a Prosperous Wales under the Well-being of Future Generations Act. Through speakers' experience, discussion, and a World Café exercise, we uncovered key insights on the role of language, collaboration, and citizen involvement in tackling poverty and driving meaningful change.²

Where there are strong ties to the third sector, we see a distinctly positive change to the culture of that PSB. This has enabled an openness to participatory approaches and facilitated involvement. However there is a relative lack of third sector and community voice as standard across all PSBs undermining their potential for collaboration and involvement. The statutory distinction between “members” and “invited participants” contributes to a perceived and actual hierarchy, which can exclude valuable experience and grassroots insight.

² <https://copronet.wales/five-things-we-learned-from-our-from-poverty-to-prosperity-event/>

There are barriers to creating a consistent understanding or operationalisation of the five ways of working, particularly in relation to prevention and long-term thinking. This has been made difficult with changes and turnover in staffing as well as inconsistencies in levels of engagement at PSB meetings.

Resource constraints have further impacted the ability to realise the Act's intentions. Officers often face limitations in terms of time, support, and clarity, which hinders progress. This has caused resistance to taking advantage of opportunities to further the working of PSBs, including engagement and involvement activity, as there is limited capacity to follow through on the resulting actions or deliver the work aligned to possible funding.

There are also concerns around the current PSB model. In some cases, it is perceived as lacking sufficient mandate and authority, and there are often concerns noted of duplication of effort with Regional Partnership Boards and Corporate Joint Committees. This can lead to structural disconnection which reduces impact.

A key challenge in the legislation is its assumption that PSBs are well-resourced delivery bodies, capable of meeting complex output requirements. In practice, most PSBs today have limited capacity which is often focused primarily on maintaining meeting cycles. However, their unique value lies in their role as strategic partnerships - they have the great potential to be platforms for building trusted relationships, aligning priorities, and streamlining the wider strategic landscape. To be most effective, the Act should place greater emphasis on supporting and enhancing this relational role rather than imposing operational expectations that exceed current resourcing levels for PSBs.

Recommended actions:

- **Clarifying accountability and strengthening oversight mechanisms** would help ensure that responsibilities are well understood and that progress can be more consistently monitored and supported.
- **Simplifying the legislative language and accompanying guidance** could enable more confident and consistent implementation across PSBs.
- **Improving the interface between PSBs and other strategic partnerships**, such as Regional Partnership Boards (RPBs), would help reduce duplication and promote more coherent, joined-up working.
- **Clarifying the role of the Office of the Future Generations Commissioner and Welsh Government in relation to PSBs** is also important. These relationships should be collaborative and enabling, with a focus on shared learning, capacity-building, and support—rather than being perceived as directive or hierarchical.

3. Whether the review and reporting requirements under the Act are being met.

Current practice within PSBs:

Well-being assessments and reports could offer an opportunity for meaningful reflection, learning and improvement. The process of developing well-being assessments and annual reports can offer an opportunity to involve communities in and strengthen strategic alignment across activity to meet well-being goals. However in practice they have been previously produced and reviewed as a compliance-driven exercise, with limited opportunity for engagement, cross siloed working or longer term thinking. The current formats tend to favour cautious, risk-averse approaches and with limited space for exploring the opportunity for co-produce activities with communities rather than conduct one off consultation.

There is untapped potential to embrace more creative and participatory approaches (such as storytelling, film, visual media), that would reflect the ways of work of the Act. Greater encouragement and support for such methods could enhance transparency, engagement and impact. This would build trust with communities, explore complexities of lived experiences and ensure communities felt heard and valued within the process.

Recommendations:

- **Shift the focus of reporting from compliance toward learning and development**, enabling PSBs to reflect more openly on what is working, what isn't, and why.
- **Encourage the use of diverse and creative reporting methods**, and foster a culture that values a full spectrum of evidence—including both successes and setbacks—as essential to long-term progress.
- **Embed evaluative thinking from the outset of planning cycles**, ensuring that reflection, adaptation, and learning are integral to the way plans are developed and delivered.

4. The effectiveness of guidance made under the Act.

Current guidance for PSBs:

The 'Shared Purpose: Shared Future 3' guidance document, while well-intentioned, does not always align with the practical realities faced by under-resourced, multi-agency partnerships. In its current form, the guidance can inadvertently contribute to increased administrative demands without proportionate improvements in delivery or outcomes.

A strong emphasis on process over impact can sometimes constrain action and innovation. The requirement for PSBs to produce multiple formal outputs—such as assessments, well-being plans,

and annual reports—within each five-year cycle often limits the time and capacity available for implementation and long-term change. This can unintentionally promote short-termism, which runs counter to the principles of sustainable development the Act seeks to uphold.

In addition, overlapping organisational plans contributes to complexity, administrative burden, and reduced coherence in collective efforts. Streamlining expectations and aligning planning processes could help strengthen strategic focus and enable more impactful collaboration across partners. Multiple overlapping organisational plans creates an administrative burden and weakens the coherence of collective action.

Recommendations:

The guidance needs to be revised, simplified and enabling:

- **Provide more flexible, example-led guidance**, including practical case studies and links to external tools (such as our range of resources on co-production for PSB³), to help translate the principles of the Act into action across diverse local contexts.
- **Empower PSBs to define their own success criteria** within the framework of the Act, enabling them to tailor their approaches to local priorities while remaining aligned with the overarching goals of sustainable development and well-being.

5. How far the Act has been legally binding and enforceable.

Accountability and scrutiny of PSBs:

Current scrutiny arrangements, primarily conducted through local authority committees, may inadvertently reinforce existing power imbalances and do not always reflect the collaborative, partnership-based ethos at the heart of PSBs. Officers have noted that scrutiny processes can feel procedural rather than purposeful, with limited focus on genuine progress toward well-being goals or the application of the five ways of working.

The emphasis on compliance within the scrutiny framework can unintentionally discourage innovation and risk-taking. While oversight is essential, effectiveness cannot be measured by compliance alone, especially in a model that values long-term thinking, partnership working and preventative approach.

There have been reported changes in PSB meeting culture during meetings open to the public. This has created spaces that enable open, constructive dialogue with members of the PSB and public having heightened engagement in subjects discussed. In Cwm Taf Morgannwg, positive work has been carried out to involve the voices of young people within the PSB structure. The Co-production Network for Wales has supported events to engage young people and explore

³ <https://copronet.wales/category/resources/>

the co-development of reverse mentoring, with young people engaging with PSB members. This is in its early stages however has the potential to bring constructive challenge from young people within future planning and scrutiny.

This has demonstrated how public participation in PSB meetings can be effective in driving forward effectiveness in comparison to formal, procedural approaches. However, limited infrastructure currently exists to support informal or developmental scrutiny, and public access to PSB processes remains restricted, reducing opportunities for transparency and participation.

Financially, while recognising that PSBs lack dedicated funding, many do not fully utilise any funds that are available to them. This is often due to the mechanisms through which funding is distributed, as well as varying levels of motivation or clarity around how the funding can be most effectively used. Strengthening support, flexibility, and shared understanding around funding could help address this issue.

There is a clear opportunity to explore how other parts of the public service system—such as procurement and finance teams—could play a more active role in embedding collaboration, long term thinking and integration as part of the ways of the Act, helping to translate its intent into more tangible mechanisms.

Recommendations:

- **Review and revise the current scrutiny model** to better reflect the collaborative, cross-sector nature of PSBs. Oversight mechanisms should be designed to support partnership working, rather than defaulting to structures designed for single organisations.
- **Explore more public-facing and participatory approaches to scrutiny**, such as themed open meetings or citizen panels, to strengthen transparency, build public trust, and ensure diverse voices, including young people’s voices, help shape local well-being agendas.
- **Involve procurement and finance professionals more actively** in the strategic delivery of the Act, recognising their critical role in embedding long-term thinking, collaboration, and sustainability into core systems and decisions.
- **Consider performance-based incentives**—for example, linking access to certain grants or resources with clear evidence of applying the five ways of working. This could help reinforce the practical value of the Act and encourage continuous improvement.

6. How far the Act has represented, and will continue to represent, value for money.

Concerns with assessing value for money through PSBs:

We believe that framing the question of the Act’s effectiveness solely in terms of “value for money” may risk missing its long-term purpose. The Act is designed to promote prevention and sustainability—areas where benefits often take time to materialise and are not always easily captured through short-term financial metrics. In regards to involvement, this is predicated on the building of trusted relationships between communities and public services, something that is urgently needed in the current political environment but will require time and investment to achieve. We would advise that evaluating its impact therefore requires a more nuanced, future-focused lens.

At the same time, there is a recognised need to address inefficiencies within the system. Duplication is a common challenge—not only between different statutory boards and their respective assessments (e.g. PSBs, RPBs, CJC), but also within PSBs themselves, where partner organisations such as local authorities, health boards, and fire and rescue services may be conducting overlapping work. This can lead to resource inefficiencies and engagement fatigue among partners and stakeholders.

Moreover, many well-being plans largely reflect existing organisational activity, with limited evidence that collaborative efforts are consistently adding new value. There is an opportunity to strengthen the distinct contribution of PSBs by fostering deeper collaboration, shared innovation, and joint action that extends beyond business-as-usual.

PSBs have the potential to fundamentally change the way their member organisations work together, involve their communities in their work, and understand their role in overcoming regional challenges. Concentrating on the 5 ways of working would help to provide this focus in their work, establish a meaningful point of difference between PSB and other regional multi-agency bodies, and reduce the risk of short-termism, tokenistic actions, or reverse engineering of Well-being Plans to align with actions already committed to.

Recommendations:

- **Rationalise overlapping structures and statutory duties across boards**, helping to streamline governance, reduce duplication, and make best use of limited resources.
- **Promote integrated and collaborative planning processes**, encouraging shared priorities and joint action across partnerships to deliver more coherent and impactful outcomes.
- **Invest in well-resourced support for PSBs**, recognising that dedicated, skilled staff are often central to driving progress, sustaining partnerships, and translating strategic intent into meaningful action.

The Well-being of Future Generations (Wales) Act 2015 remains a significant piece of legislation. However, without reforms to its implementation, accountability, and structural support, its transformative potential risks being lost. Our evidence reflects the lived realities of those working to bring the Act to life at the frontline of Welsh public services.

We would welcome the opportunity to provide oral evidence to further explore the involvement activities we are working on with PSBs to improve the Act's implementation or further detail on any of the points raised in this submission.

Senedd Cymru | Welsh Parliament

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol | Equality and Social Justice Committee

Ymateb gan: Cwmpas | Evidence from: Cwmpas

Well-being of Future Generations (Wales) Act 2015: Post-legislative scrutiny



Ten years on from the introduction of the Well-being of Future Generations Act, the need to embed sustainable development and wellbeing economics within our communities is clearer than ever.

At Cwmpas, we work within communities across Wales to help build a fairer, greener economy and a more equal society. We tackle poverty and inequality by promoting social enterprise and co-operative solutions and supporting communities, businesses and public services to improve and innovate through our expert advice and consultancy services. We want to empower communities across Wales to shape a better future for all, putting people and planet first.

The Impact of the Act

The Act is a valuable asset in achieving our mission and sets a powerful framework for all organisations to shape their work for the benefit of future generations. Over the past ten years, we have seen several examples of culture change within Welsh public bodies, the wider economy and public sphere, showcasing that things can be done differently with a long-term approach.

However, we strongly agree with the widely-held belief that this approach needs to be even further embedded. While there are positive examples, we have not seen the fundamental changes to processes, structures and underpinning perceptions that are needed in order to do things differently and effectively in a consistent and fundamental way.

Improving the effectiveness of the Act

We are passionate about the role of the social economy and wider third sector in achieving the ambitions of the Act, and that they must play a central role in improving its effectiveness. They should be valued as a key asset in this mission.

One limitation of the Act is that it does not cover the private sector. Clearly, the ambitious wellbeing goals within the legislation will not be achieved without ensuring the private sector plays a fundamental role in the shared mission. We have seen some evidence of a growing culture shift within Wales, with private sector organisations seeking to embed social value in the period since the legislation. However, there is much more to be done in ensuring this is happening consistently and comprehensively across different communities and sectors.

However, the ultimate way to see this being done is by growing the proportion of the economy with a social enterprise or co-operative model, which are proven to create social value and support the achievement of the wellbeing goals, embedding these principles within their business model. As part of the Social Enterprise Stakeholder Group, we published Transforming Wales through Social Enterprise, a ten year vision and action plan which has the ambitious objective to make social enterprise the business model of choice in Wales. Achieving this would be transformative, and be pivotal to achieving the Wales we want to see, as set out in the Wellbeing of Future Generations legislation.

It is clear that the growth of these sectors must be a vital milestone in assessing the impact of the Act. We were encouraged to see these models and sectors at the heart of the 2025 Future Generations Report, with specific recommendations to aim to double the size of the social enterprise sector through continued investment in Social Business Wales, and investment in a Co-operative Development Hub. We are working with the Future Generations Commissioner's Office to proactively support this and their work on the foundational economy and community wealth building. We have engaged with some PSBs across Wales, supporting them to consider the role of local social business sectors and their role in proactively supporting them. This needs to be done comprehensively and consistently across Wales.

The role of the wider third/social enterprise/not-for-profit sectors will be essential in delivering the ambitions of the act. However, as the sector is not legally bound by the Act, the role of organisations within it as a key delivery partner is not strongly enough entrenched. That plays out in two ways; firstly, in relation to the wellbeing goals, organisations within the sector don't have to consider their role or shape their work under the framework to ensure that they are contributing to the goals and overall objective. Of course, many naturally are doing so, and contributing by virtue of the Act's alignment with the values and aims of the sector. Secondly, in relation to the ways of working, the sector is not consistently meaningfully involved in shaping cross-sector plans to deliver against the goals – representation mechanisms are not working well everywhere, and are not the answer to true engagement of the sector and people themselves in shaping wellbeing plans and delivery locally. For effective engagement and empowerment of the sector, we need to consider how the Act can support the third/not-for-profit/social enterprise sector to be an equal partner at all strategic and delivery levels needed to deliver against the goals.

Enforcing the Act

Accountability mechanisms need to be strengthened so that bodies bound by the Act are held accountable and penalised for non-compliance. We would suggest that this could be

done along similar lines to the Information Commissioner model – where organisations are fined for not complying.

Value for Money

A key element of this legislation, and the wider objectives of a wellbeing economy and public service delivery that focuses on wellbeing, is that value for money should mean how investment can most positively impact wellbeing, rather than finding the lowest-cost option. In order to do this effectively, it is essential that budgets move towards preventative investment. We will not see communities that meet the legislation's wellbeing goals, and that are not in a state of perma-crisis, without addressing the underlying causes of poverty, inequality, poor public health and other societal challenges. To achieve this ambition we need sustainable prosperity, with an inclusive and equitable economy providing the social safety net and opportunities that allow people to lead healthy, happy lives.

Social enterprises and co-operatives offer a powerful means for government to achieve value for money in a preventative way by rethinking how public spending supports communities. These models inherently prioritise social outcomes alongside financial sustainability, delivering services that address root causes of challenges such as poverty, social exclusion, and poor health. By reinvesting profits back into communities, social enterprises and co-operatives foster a virtuous cycle of impact that reduces reliance on costly reactive interventions.

For example, social care co-operatives create stable, good-quality jobs and prioritise delivering the highest quality of care. Social enterprises focused on youth engagement provide tailored, locally-led programmes that tackle unemployment and reduce crime. These interventions go beyond the immediate transaction of a government contract, generating wider social value that benefits public finances.

Moreover, co-operatives and social enterprises excel in partnership working and co-design, empowering citizens to shape services that truly meet local needs. This reduces duplication by ensuring government-funded programmes are responsive and effective.

By investing in these models, governments move from short-term crisis management to sustainable, community-driven prevention. The result is not only better outcomes for individuals but also more efficient use of public resources, as money spent today builds future capacity and reduces future demand for expensive interventions. In this way, social enterprises and co-operatives are essential partners in delivering true value for money in preventative public services.

The Wellbeing of Future Generations Act creates a framework that incentivises preventative spending, driving value for money by ensuring that public funds are directed toward long-term solutions. By aligning investments with future needs and collective wellbeing, the Act promotes sustainable social, economic, environmental, and cultural outcomes, reducing future government expenditure. To ensure the Act delivers this, public sector bodies must embed long-term, preventative thinking in decision-making and budgeting processes. Clear accountability, robust measurement, and active collaboration with social enterprises and co-

operatives are essential to fully realise the Act's potential in delivering value for money and transformative outcomes.

Equality and Social Justice Committee Well-being of Future Generations (Wales) Act 2015: Post- legislative scrutiny

Names if Appropriate

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Senedd Cymru | Welsh Parliament

[Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol](#) | [Equality and Social Justice Committee](#)

Ymateb gan: Cymdeithas Llywodraeth Leol Cymru | Evidence from: Welsh Local Government Association

Introduction to the WLGA

the Welsh Local Government Association (WLGA) is a politically led cross-party organisation that seeks to give local government a strong voice at a national level. We represent the interests of local government and promote local democracy in Wales.

The 22 councils in Wales are our members and the three fire and rescue authorities and three national park authorities are associate members.

We believe that the ideas that change people's lives, happen locally.

Communities are at their best when they feel connected to their council through local democracy. By championing, facilitating, and achieving these connections, we can build a vibrant local democracy that allows communities to thrive.

Our ultimate goal is to promote, protect, support and develop democratic local government and the interests of councils in Wales.

We'll achieve our vision by

- Promoting the role and prominence of councillors and council leaders
- Ensuring maximum local discretion in legislation or statutory guidance
- Championing and securing long-term and sustainable funding for councils
- Promoting sector-led improvement



- Encouraging a vibrant local democracy, promoting greater diversity
- Supporting councils to effectively manage their workforce.

As the Employers organisation for local government in Wales, we work to ensure the vital contribution made by local government employees to improving the social and economic health of their communities is protected, and to maintain positive industrial relations within our workforce.

Well-being of Future Generations (Wales) Act 2015: Post-legislative scrutiny

Background

- The WLGA welcomes the Committee’s decision to undertake post-legislative scrutiny into the Well-being of Future Generations (Wales) Act 2015 (“the Act”).
- The Act embraces all 22 local authorities, making it a statutory duty for Welsh Councils to ensure that their actions meet the needs of the present, without compromising the ability of future generations to meet their own needs.
- Reaching a ten-year milestone since Royal Assent provides a positive opportunity for the WLGA to engage with the Senedd’s post-legislative scrutiny, and also to engage with the landmark report issued this year by the Future Generations Commissioner.
- In developing this response for the Equality and Social Justice Committee we have issued a call for information to our Members and received a range of responses. Five local authorities provided a response, and the evidence also reflects the experience of the WLGA itself in engaging with the Act directly and through our Cabinet Member and policy networks. Several local authorities have indicated that they will respond individually, and this collective WLGA response seeks to draw out common themes and present the view of the Association as a whole.
- We have allocated our evidence to six headings set out by the Committee in its Terms of Reference.

1. How far has the intended objective of the Act been achieved?

- 1.1. Realising the seven well-being goals that sit at the heart of the act requires a co-ordinated effort by all of the public bodies covered by the legislation, and depends also on national, UK and global factors. Wales’ 22 local



- authorities are working towards the achievement of the goals and welcome the framework that the Act provides in that regard.
- 1.2. But attaining these bold and aspirational goals will ultimately be impossible without fair and sustainable funding for Welsh councils. Moving towards sustainable development, prevention and long-term planning requires up-front investment. The current financial situation facing local government does not reflect the spirit of the Act at all and at the local authority level all resources are directed to responding to immediate service pressures.
 - 1.3. The Welsh Government publishes its 'Wellbeing of Wales' report which aims to assess progress towards a set of national indicators and milestones associated with the Act's well-being goals. The analysis published by the government makes clear that the economic impacts caused by the Covid-19 pandemic and the war in Ukraine continue to influence measuring progress made towards the goals. It remains too early to judge whether the legislation has made a significant difference to actual outcomes from public service delivery.
 - 1.4. Positively, Welsh Councils report conclusively that the Act has brought about changes in the way they work, and that these changes are welcome and useful. The statutory duties the Act places on councils mean that officials have engaged with the seven well-being goals and five ways of working and have integrated them into decision-making and corporate planning.
 - 1.5. There is evidence across local government of a sincere engagement with the Act and its principles, utilising the well-being goals as a framework for adopting a more collaborative approach to decisions, with one responding authority stating that it utilises the Act in this way on a daily basis.
 - 1.6. At Denbighshire Council, for example, Well-being Impact Assessments are used as a way of ensuring that major decisions comply with the Act. Major decisions are assessed on implications for equalities, socio-economic disadvantage, Welsh language, biodiversity, and carbon impact—ensuring a balanced approach to decision-making that reflects the five ways of working.
 - 1.7. However, all Councils have indicated to the WLGA that the underfunding of local government has undermined the potential effectiveness of the Act.
 - 1.8. Specific problems include that a lack of dedicated funding for Public Service Boards (PSBs) and prescription around the Wellbeing Assessments and associated Plan mean that PSBs could have achieved more if there had been greater freedom and fewer constraints.
 - 1.9. Focussing on the five ways of working that are intended to realise the Act's goals, **collaboration** now represents a complex web of partnerships, which have varying degrees of effectiveness and some of which exist only because there is a statutory requirement, rather than because they are leading to improved outcomes. Collaboration can be restricted by short-term grant allocations and statutory obligations that require significant bureaucracy. There is support for the Future Generations Commissioner's



- recommendation on streamlining partnership structures across Wales to improve efficiency,
- 1.10. The commitment to **involvement** is crucial but expanding upon existing mechanisms is difficult with limited capacity and funding. The financial reality imposed on local government means that most involvement is around how services will be amalgamated or closed, or how fees and charges will be increased in order to make the services financially sustainable. The budgetary situation means that there is little scope for community involvement that is ambitious and is around expanding services or creating new initiatives.
 - 1.11. Councils welcome the emphasis on **prevention** but this requires an ‘invest-to-save’ approach. For example, the flooding coastal defence scheme at Colwyn Bay, led by Conwy Council, represents a preventative approach to climate change adaptation but also delivered urban renewal and biodiversity benefits through its design. By providing funding to Conwy Council’s project from outside of the local government financial settlement, the Welsh Government enabled a better preventative approach to be delivered by the council. The WLGA notes the Wales Audit Office finding ‘accelerating progress under the Act starts with prioritising prevention’ and that this requires a systematic shift at all levels of government.
 - 1.12. On **long-term**, councils struggle to balance the need for long-term sustainability with the urgent need to meet statutory duties and critical short-term pressures.
 - 1.13. Councils believe that more needs to be done on **integration**. Progress has been made on including other public sector within the statutory obligation, but there is a need to approach the well-being goals through a collective public sector lens.

2. Views on any action which should be taken to improve the effectiveness of the Act and its implementation, including any specific drafting issues

- 2.1. We received substantial suggestions from councils in favour of reviewing the requirements around PSBs, and around Well-being Assessments and Plans. One council believed that the requirements seem dated as significant progress has been made at the PSB since the Act came into force, with the level of prescription now feeling unnecessary and a hindrance to PSBs being more dynamic and innovative. Another council was more critical and stated that PSBs add no significant value to what is an already over-crowded partnership landscape. Even a less critical view from another council which valued the concept of PSBs still maintained that without “teeth or proper funding”, the Boards have little ability to influence decisions compared to local government, Corporate Joint Committees and Regional Partnership Boards.
- 2.2. The requirements of the legislation for Well-being Assessments to be completed every five years are not proving as effective for councils as they might be. In light of the wider macro-economic challenges outlined above,



councils are not seeing significant change over the five year period, meaning that the assessments are likely to be repetitive – while also representing a large commitment of resources. Councils would welcome less-onerous ways for the assessment to be completed, or for the PSB to be better resourced to do so.

- 2.3. The scope of public bodies covered by the Act could also be reviewed and strengthened. There are numerous third sector organisations and bodies that fall outside the scope of the Act and are not required to comply, often relying on voluntary participation. This can affect the collaboration between the public bodies listed in the Act and these external organisations, particularly in areas such as service commissioning.
- 2.4. In terms of the Office of the Future Generations Commissioner and how it supports implementation of the Act, councils are turning their focus to responding to the commissioner’s five-year report. The 50 recommendations are seen as relevant and having the potential to drive change (where they are not recommendations which reflect activity already being pursued), but the WLGA would underline that the financial constraints facing councils will make their implementation extremely difficult.
- 2.5. The WLGA and its member councils will thoroughly examine the recommendations and will work with the Commissioner to drive further progress towards the goals of the Act. But we continue to emphasise that only with greater resources can councils contribute fully to the well-being of Wales. Councils know that simply requesting more funding is also not sustainable, so advocate for preventative investment, to make better use of existing resources, and to reduce costs where programmes and initiatives are not contributing to the goals of the Act.

3. Views on whether the reporting requirements under the Act are being met

- 3.1. All councils contributing to this evidence were clear that the reporting requirements are being met and that this aspect of the legislation is uncomplicated.
- 3.2. The Well-being Objectives element is seen as working well because it aligns with Corporate Plans and annual reports. Councils have ensured that these strategic objectives are understood across organisations and that policy decisions align with the objectives and the wider aims of the legislation.
- 3.3. PSBs remain an area of weakness in terms of reporting. While the reporting requirements are being met, Councils again underline the lack of engagement with PSB well-being plans and annual reports, and note that the work of PSBs is often not referenced in other strategic documents.
- 3.4. Councils noted that meeting the reporting requirements is not challenging but would appreciate better linkages between the reports and assessing the overall impact of the legislation. Measuring the performance of local



services is difficult due to the lack of timely, comparable data at a local level, limited national survey data and the absence of consistent data reporting requirements for public bodies. This undermines the effectiveness of the National Indicators in driving change. The WLGA is deepening its support for councils through integrating Data Cymru into our organisation.

4. Views on the effectiveness of guidance made under the Act

- 4.1. Guidance under the Act has provided useful clarification, but is also seen as overly prescriptive. The usefulness of the guidance is in how it sets out the statutory requirements for setting objectives and reporting on them, and on the need to integrate the Act with existing performance processes.
- 4.2. The guidance successfully clarified the nature of the seven Well-being goals, which in an example from one council had initially caused some confusion, with officers being unclear on whether a Resilient Wales related mainly to community resilience or climate resilience.
- 4.3. But the prescription in the guidance is specifically seen as unhelpful regarding the process of preparing the Well-being assessments. Councils and PSBs should be given greater flexibility in agreeing how this exercise is undertaken.
- 4.4. Ongoing support from the office of the Future Generations Commissioner complements the statutory guidance and has been welcomed in the form of a national training series and an offer of tailored support on key pieces of work. There is a sense that this support is slightly overdue and can be built upon in the near-term.
- 4.5. Overall, councils feel that all guidance around the Act should be reviewed to reflect how public bodies operate in reality, and to place more trust in local government and other bodies on how the aims of the Act can be delivered. Guidance needs to reflect how councils can move towards prevention and long-term thinking/planning, rather than prescribing specific procedural steps that should be taken to fulfil the Act.

5. Views on how far the Act has been legally binding and enforceable

- 5.1. The extent to which the Act has been legally binding and enforceable remains unclear, as does its actual impact on decisions and outcomes when compared to direct factors such as public spending levels and the local impact of global events.
- 5.2. Local authorities have consistently complied with the statutory and reporting requirements of the Act and as already evidenced, have adhered to the spirit of the legislation. As evidenced, the Act plays a genuine and established role at all councils as a framework for decision-making and policy-making.
- 5.3. However, the Act contains no obvious tools to test whether policy decisions made in Wales (across all levels of government) are actually



advancing the well-being goals or not, and does not spell out any consequences for this not to happen. Similarly, the Act doesn't provide any resources that would enable Welsh Councils to fund greater prevention activities without impacting day-to-day services – further weakening enforcement of the Act's provisions.

6. Views on how far the Act has represented, and will continue to represent, value for money

- 6.1. There are two broad considerations around whether the Act represents value for money. Firstly, whether implementation costs are worthwhile compared to not having the Act. And secondly whether activity pursued as a result of the Act delivers financial savings, service improvements or social-economic and environmental value.
- 6.2. Welsh Councils have successfully integrated and mainstreamed the Act's ways of working, as indicated by our evidence and by the Wales Audit Office's April 2025 report 'No Time to Lose'. Implementing this culture change includes some corporate costs but is aligned with Corporate Planning activity that would have happened in any case, and doesn't feature as a significant cost pressure for local authorities.
- 6.3. However, there are administrative and capacity costs associated with the PSBs that are not consistently seen by Welsh Councils as representing value for money. At least one council believes that the annual support grant for PSBs offered by the Welsh Government created an additional administrative burden and contained prescriptive criteria; while noting that councils have still engaged meaningfully with applying for the grant across Wales. We would support reviewing the effectiveness of PSBs as a whole, examining potential funding streams, and unlocking maximum flexibility in how they are operated. Given the existence of a crowded regional landscape, it would make sense to review regional partnerships in the round or as a whole, and the WLGA believes this could be a matter for the next Senedd term.
- 6.4. In terms of whether the Act has changed the delivery of public services or the nature of local government decisions in a way that either saves money or creates better value for the same amount of money, this remains difficult to detect. The Act exists within a public services landscape where the cost of delivering key services around social care, cared-for-children, and ALN reform has outstripped increases in local government funding. Over the past decade up to 2023-24, local authorities' core revenue funding decreased in real-terms.
- 6.5. This means that an 'invest-to-save' approach to prevention is difficult to achieve. The opportunities in prevention are difficult to overstate, and future financial and social savings could be unlocked in homelessness prevention, community resilience, children's services and especially in public health (supported by non-statutory but at-risk local government services). The WLGA calls strongly for a systemic emphasis on long-term



prevention to be set by the Welsh Government, supported by meaningful resources and where decisions can be linked to the Act and the prospect of future savings.



Senedd Cymru | Welsh Parliament

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol | Equality and
Social Justice Committee

Ymateb gan: School of International Futures | Evidence from: School of
International Futures

Cat Zuzarte Tully: Submission for the Post-Legislative Review of the Well-being of Future Generations Act (WFGA)

Thank you for the opportunity to respond to this review.

An initial key message I want to share is **how important the WFGA is at a global level as a north star for other countries who are wrestling with the growing challenges of short-termism.**

Although far from perfect or a panacea, Wales' experience of the past fifteen years is a powerful example of governing for the long-term as well as the present. This is needed now more than ever as legacy representative democratic systems seem overwhelmed by a challenging wider international context (geopolitical instability, declining trust in state legitimacy and authority (especially among young citizens who see their interests being entirely failed), misinformation and overshooting of planetary boundaries). The Act has led to Wales being a global first mover and leader in responding to the question: how can a government act in service of the wellbeing of future and current generations?

The ecosystemic approach taken in the implementation of the Act (given its origins, duties, implementing institutions, and call to action) is powerful and effective. By actively taking a whole of society approach - uniting civil society - including business, academia, community groups, together with public officials, and politicians it provides an indication of what an intergenerationally fair system fit for the 21st century might look like. From that yardstick - as a tangible demonstration or prototype of the kind of change that is needed - it has been very successful indeed. Please note that I am not an unqualified champion of the implementation of the Act in practice - there is a lot further to go as I hope the article quoted above shows. I am, however - having spent twenty years focused on building long-term capability across governments around the world - fully cognizant of how difficult it is to fight the tyranny of the present in political systems in a sustained way over time.¹

Having opened with an international perspective, as good a global citizen Wales has been and continues to be, **the primary imperative of the act is to make a difference to the nation and people of Wales.** And here the **story is one of potential, and of positive signals; but one where ambition and impact must be scaled up.** I will focus on that impact, with the caveat that this is from the point of view of a supportive organisation but one based outside of Wales. As an organisation - and also speaking personally as an individual (having been in the room when the act was signed ten years ago) - SOIF has supported multiple implementation endeavours across the Welsh system, including supporting WCVA, NICW, FG Commissioner's Office, Parliament, Public Health Wales,



etc. We have the following observations to make in particular on three of the review questions: how far the intended objective is being achieved; actions to improve effectiveness; and value for money.

¹ My paper on "[What we can learn from Wales](#)" explains why it has been such a powerful Act and movement - and helps other countries learn as they come into contact and are inspired by the Wales WFGA experience.

- The power of the WFGA framing to tell a **collective future-oriented story across Wales** that can connect different local authorities, businesses, and community groups, public bodies has been remarkable. It is at a level I have not seen achieved elsewhere - and I imagine is due to the relatively participatory quality of the dialogue process "The Wales We Want" in the year before the Act was signed.
- In particular, this facilitates coordination between different parts of the system to build the whole of society approach that is needed to have profound and **difficult conversations around tradeoffs and choices across policy areas** over time - whether to protect an area of special ecological importance, or changing curriculum, or reducing the speed limit. This is incredibly difficult to sustain or do - in particular in these atomised times - so the various success stories are ones to cherish and hold as an example of what is possible.
- Another success seems to be the **balance between constructive support versus scrutiny** from the commissioner's office and Audit Wales - an area where most other international innovations have failed to get the balance right. In particular, I would like to commend the Article 21 process. I was part of the external advisory committee on that scrutiny process and I thought it was a very powerful way of doing an assessment, gap-analysis and directing recommendations for further progress in a way that was systemic and empathic.
- Relatively successful **embedding and driving change in culture and behaviour**:
 - The act has driven an interest and culture in building technical foresight and anticipatory capability that is much higher than most other countries and nations . Public organisations from NICW (2100 scenario building²) to Public Health Wales (insights and capability building) have been inspired to both build their own capability but also develop toolkits and programmes that have much wider benefit to other organisations and communities. There is far to go, but compared to many other governments, the sense of common endeavour and joint learning across technical staff is notable.
 - Civil society organisations - including youth groups such as EYST, supported by WCVA, as well as the youth "Wales 2100" group - have been having interesting conversations about the future connected to resources and action (Better Futures Wales: Community Foresight project³).
 - There has been good uptake by universities and businesses, with a number of businesses adopting the Act's framework despite no legal requirement to do so - a testament to the WFGA becoming embedded in Welsh culture.
 - At a leadership level, there has been valued support and championing from the Permanent Secretary and First Minister, and senior leadership support. How these leaders communicate with the Welsh public about the journey Wales has taken, and why decisions are being made for current and future generations could be improved.



- But most importantly, it's the **interconnection and innovations that connect across these different sectors through cross-cutting different initiatives** -

² NICW link

³ Better Futures Wales Project

whether intergenerational mentoring and building champions of the future (Future Generations Leadership Academy), place-based conversations, or reports and storytelling (Futures Storytelling in Bannau Brycheiniog National Park Authority⁴) - that is most powerful.

- All this is a good start and needs building on - I hope the opportunity arises in the course of this inquiry to explore **how to turbocharge ambition and impact** by: connecting more profoundly to resource allocation processes; stronger intergenerational fairness scrutiny processes in legislative and budgetary processes; big infrastructure decisions; and deep decade-long partnerships with businesses that can give certainty around making early transitions to an ecologically sustainable and technologically equitable economy.
- Most importantly, I hope the review prioritises calling for **resourcing and building deep intergenerational dialogue at a community level** that is the foundational basis for exploring how we build consensus for the transitions ahead - and how to fairly distribute the costs and benefits between generations. This is the only way to build lasting support for politicians to do the difficult task of reflecting the interests of young stakeholders and future generations that cannot vote in representative democratic processes. Enabling quality conversations about the options and issues ahead - that taps into the insights of our older members of the community as well as valuing the insights from the youngest - in classrooms, the media, within family exchanges, communities, is the civic capability we need as citizens to help us manage and meet the pressures and anxieties of the current world. In particular, continuing to engage directly with young people so this Act is a space for them to positively imagine and shape their future is critical
- Two final points on impact and value for money from a beyond-Wales lens:
 - Impact can often be measured by 'FOMO' or imitation. **It is interesting to see how the rest of the UK and Eire - indeed local authorities e.g. Oxfordshire - outside of Westminster has learnt from the Wales experience.** Westminster itself is finally catching up, with the recent Cross-Party Liaison Committee report⁵ recognising the model and growing calls for a similar approach from MPs of different parties within different sectors (prevention, public services, public health, children's rights). From a value for money point of view, the Commissioner's Office and Auditor General have been targeted in responding to the global interest in Wales' WFGA - choosing **judiciously how to use minimum resources to get maximum impact by working in partnership through powerful global networks and specific global moments.** The Wales Protocol and Future Generations Forum event in April 2024, and eventually the presence of the Commissioner at the UN Summit of the Future, had a significant impact on the content and the "cut-through" of the PN Declaration on Future Generations. Through building global legitimacy and clarity among member states in the



lead up to the negotiations in September, Wales' role led to a higher ambition commitment to what will be seen in the future as *the most important document to come out of the UN this decade*.

⁴ Bannau Brycheiniog National Park Authority

⁵ Liaison Committee Report

My final reflection (and associated recommendation) is that the power of the Wales story comes from the exceptional longevity and stability of the innovation. This has enabled an incredibly ambitious governance transition to play out over time. But the job of promoting the wellbeing of current and future generations is never done: constant effort is needed to combat the pressures to defect to the present that is an ever present feature of all social systems. **It is important more than ever to continue to resource and build awareness and support among the next generation of leaders and citizens across the political spectrum.**

School of International Futures

The **School of International Futures (SOIF)** is a not-for-profit international collective of practitioners based in the UK who use futures thinking to inspire change at the local, national and global levels. SOIF has worked with organisations like the UN, Omidyar, NATO, OECD, the Royal Society and over forty national governments to make the world fairer for current and future generations. SOIF also supports a growing network of **Next Generation Foresight Practitioners**.

Date/Dyddiad: 3 June 2025

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Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol | Equality and Social Justice Committee

Ymateb gan: Cyngor Bro Morgannwg | Evidence from: The Vale of Glamorgan Council

For the attention of: Jenny Rathbone MS Chair
Equality and Social Justice Committee Welsh Parliament
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WELL-BEING OF FUTURE GENERATIONS (WALES) ACT 2015: POST-LEGISLATIVE SCRUTINY

We are delighted to offer some thoughts from the Vale of Glamorgan Council which we hope assists with the Senedd Review. We have contributed to the WLGA's evidence but welcome the opportunity to elaborate a little further from our local perspective.

The Council is a passionate advocate for the Wellbeing of Future Generations Act and we were early adopters of the legislation. This process was invaluable to us a decade ago as we embarked on a whole organisation transformation, focusing on the needs (both now and of the future) for our residents and shaping the Council we needed to be to deliver it. The opportunities that early adoption brought were significant and were ones we relished. We worked hard to reflect the Act in our then Corporate Plan, bringing further integration to our work than in the past, pushing forward with collaboration as part of our transformation programme in establishing new regional services and involving our staff through our management development programme and other development opportunities.

The Act has brought about significant change in our work and, even more importantly, in our approach to that work. The Act enshrines the sustainable development principle in legislation and this is useful in as much as it 'requires' public bodies to consider it in their work. However, as seen in your recent report and that of the Auditor General, levels of compliance vary. It is our belief, however, that in order to truly deliver on the Act's essence, compliance is not enough. It requires a step change in how organisations think as well as operate. The five ways of working have proven to be a useful tool to embed the work. This Council has integrated the Principle within our corporate planning processes for over a decade, bringing together the strategic work of the organisation with the lens of Future Generations. Our established Insight Board is a good example of this integration, bringing senior colleagues from across the Council together regularly to consider a range of integrated planning activity such as risk, finance, procurement, people, digital and assets amongst others in a single and on-going conversation to ensure our

work is aligned and challenged by the Act. These ways of working structurally are important to drive connections, but the culture of seeing how our work comes together holistically is even more powerful.

The way the Act prompts bodies to think about connecting resources with outcomes and the reinforcement of that thinking through the Local Government & Election Act has provided the foundation for thinking about prevention and the long-term which should lead to greater overall value for public money if decisions are well taken. Having recently chaired the annual series of challenge sessions with our Directors to consider their self-assessment reports using the five ways of working as a way of understanding how our resources link with delivering our corporate priorities across the Council, it is clear that the Act can help focus on achieving value for money when applied consistently.

We would acknowledge though that there is further for us to go as a Council and we have been pleased to have the opportunity to develop our new Plan, Vale 2030, with you and your team and to embed the five ways of working as drivers in our transformation programme, Reshaping. To meet the challenges of even the immediate future, will require us to harness the Act even further and challenge ourselves and others in the decisions we take. We see that the overall the pace of change is probably slower than it should be across Wales and it is sometimes difficult to see the Act embedded in the work of Welsh Government particularly with regards to long term, integration and prevention. This in turn creates difficulties for public bodies particularly with regards to funding, innovation and transformation. The lack of integration and long term thinking from Welsh Government, particularly with regards to funding also means that the Act could have provided greater value for money. We would agree that the challenges of single year budgets and political cycles restrict the ability to think longer-term and welcome the conversations that are now taking place in how we can collectively work to overcome these, and that Welsh Government have indicated a willingness to enable longer-term financial planning over a medium-term horizon.

The Act's introduction of Public Services Boards was welcomed, however the lack of proper funding for these bodies and the prescription around the Wellbeing Assessments and Plans mean that PSBs could have achieved more if there had been more freedom and fewer constraints. There is a collective power in bringing partners together to respond to areas of mutual benefit across the environment and climate, the wider public health agenda and tackling poverty, for example. However, the legislation's five year cycle means in reality that nearly half of that period is spent on the preparation of an assessment and wellbeing plan which distracts from tackling ongoing and long-term issues. We are developing our thinking around the forthcoming assessment and plan and will look forward to discussing with your Office and the Government to see where there are opportunities to innovate and reduce bureaucracy whilst bringing partners together to tackle issues. Proper resourcing of PSBs would also make a significant difference and would enable them to be more effective, especially as they are regularly compared with Regional Partnership Boards which in contrast have significant spending power and therefore different levels of buy-in and potential impact.

The understanding of the public and elected Members of the work of PSBs is still under developed and an area that we hope to progress further with. In recent years there has been more interest in the work of the PSB by scrutiny members. However, the challenge for us is to move from 'interest' to more detailed understanding and challenge of the impact the work of the PSB is having on the lives of residents of the Vale.

Audit Wales should be commended for their work in developing audit approaches for the Act and it is clear that over time these have become less procedural and more about the essence of the Act. However, this has taken more time to mature than in many public bodies and it would be welcomed if these could be further enhanced, for example in moving away from requiring bodies to evidence by rote the five ways of working but rather in understanding the way these are applied and seen in organisations' work.

We would be supportive of the guidance associated with the Act being reviewed to reflect how

public bodies now operate and there needs to be more trust in how public bodies can deliver. The guidance needs to reflect changes in the past decade and the current challenges and pressures, in particular the way in which they could be future proofed – specifically around prevention and longer-term thinking. The references in your recent report are again timely, and there is an opportunity for us to take our work on prevention to the next and necessary level, in particular on public health, climate and poverty issues.

A more ‘enforcement’ approach to the Act could have been taken and may have led to more momentum. However, we would argue that that this would have been to the detriment of the collegiate approach that has developed and for those organisations who are positively responding. The current approach, particularly with the constructive relationships with your team at the Future Generations Commissioners Office feels more likely to bring about success in the longer term but there are potentially areas where a harder line could be taken to give the Act more teeth.

We have begun considering our response to the recent reports on the Act from yourself and the Auditor General. These feel timely and resonate with us at this juncture. From our early work we see that the findings in both reports will challenge our thinking and push us yet further. We hope, too, that they will lead to the changes needed to reinforce the Act across Wales. We are making early preparations to convene our entire chief officer team to consider the reports in detail and collectively identify the areas we will focus on in the coming years and would welcome the opportunity to discuss this with you further.

Yours sincerely



Rob Thomas
Chief Executive



Councillor Lis Burnett
Executive Leader



5th June 2025

Equality and Social Justice Committee
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Annwyl Glerc

Re: Well-being of Future Generations (Wales) Act 2015: Post-legislative scrutiny

Please see below written evidence from the Pembrokeshire Coast National Park Authority to support the Post-legislative Scrutiny of the Well-being of Future Generations (Wales) Act 2015 being undertaken by the Committee.

Background

The Pembrokeshire Coast National Park Authority is one of the original public bodies required to meet the provisions of the act. The Authority was part of the early adopters' programme organised by the Welsh Local Government Association prior to the introduction of the act and is represented on the Pembrokeshire Public Services Board (PSB).

Impact

The Act has been successful in terms of changing a number of conversations across Wales, however, it is more questionable how much it has significantly changed action by public bodies. Some examples include the limited spending and priority given to prevention rather than spending on dealing with outcomes. This can be particularly seen in the health sector where an increasing proportion of money is allocated to the health sector at a cost to those services which deliver the wider determinants of health such as education, work, housing, transport and the natural environment. Is this supporting prevention?

While much positive work has been undertaken on decarbonisation and meeting the challenges of climate change, we have still not seen the significant changes to some our approaches and ways of working and living.

Far greater focus is given to nature recovery currently than in previous years. This is largely due to greater policy direction and availability of funding. However, the outcome of this work is not currently being delivered. This is in part because the methods of funding are short-term and are not appropriate for nature recovery work.



Rydym yn croesawu cael
gohebiaeth yn Gymraeg, a
byddwn yn ateb gohebiaeth yn
Gymraeg. Na fydd gohebu yn
Gymraeg yn arwain at oedi.

We welcome receiving
correspondence in Welsh, and will
respond to any correspondence in
Welsh. Corresponding in Welsh
will not lead to delay.

Little has changed in the approach to the economy. The main drivers are income and GDP, with little focus given to the Well-being economy.

Public sector funding is still largely driven by the UK Government and its rules. This means that long term investment and security of funding for public and third sector organisations is not provided. This short term, hockey stick approach is ineffective and makes poor use of the available funding. A change in this approach is needed to see real change.

Due to wider funding challenges public bodies are facing and the challenges of delivering day to day services the general public's experience of public services and what they deliver does not always align with the aspirations of the Act. Where transformational changes to services have been delivered by a public body in response to improving day to day services it can be difficult to know whether this is down to the Act or driven by other factors.

Partnership

The Partnership landscape is unnecessary complex and inconsistent. In Pembrokeshire we have a:

- Health Board that operates across Pembrokeshire, Carmarthenshire and Ceredigion;
- Corporate Joint Committee (economy, planning, energy and transport), that operates across Pembrokeshire, Carmarthenshire, Swansea and Neath Port Talbot;
- Swansea Bay City Deal covering Pembrokeshire, Carmarthenshire, Swansea and Neath Port Talbot;
- Partneriaeth – South West Wales Education Partnership, covering Pembrokeshire, Carmarthenshire and Swansea,
- Fire and Rescue Service covering Pembrokeshire, Carmarthenshire, Ceredigion, Powys, Swansea and Neath Port Talbot
- Police covering Pembrokeshire, Carmarthenshire, Ceredigion and Powys
- Public Service Board is for Pembrokeshire
- Regional Partnership Board - Pembrokeshire, Carmarthenshire and Ceredigion

In view of this it is hardly surprising that partnership is challenging and ineffective. An approach where partnership across the public sector follows the same boundaries would remove several of the current barriers.

Organisations operating at a local level have a clear approach towards engaging with PSB and local Well-being plans, however, it is not clear how National organisations feed into the process. The only exception to this is NRW who sit on all PSBs. There is a missed opportunity for organisations such as Sports Wales, Amgueddfa Cymru and the Arts Council to engage with and influence local Well-Being Plans.

Resources

The Act has not led to many examples of sharing resources, including budgets. This has in part being challenging due to budget challenges on public bodies. Without funding it has been problematic to resource PSBs and the complex partnership framework has made it difficult for even large organisations to provide funding for PSBs, especially when they are members of multiple PSBs. The Regional Partnership Boards (RPBs) have had the opportunity to bid for significant funding to support their work, and this has contributed towards breaking down barriers. A similar approach for PSBs may facilitate greater partnership working and move away from the current approach.

Legal Challenge

The absence of legal challenge to the act means that there is little case law to guide future decisions. While the cost of legal challenge is significant the Commissioner may wish to consider limited challenges where public bodies are clearly not acting in a way that meets the act. This would also support public bodies to gain better understanding during decision making of how to balance different aspects of the Act where there may be tensions between different Well-being Goals or five ways of working.

Relationship with other duties

Wider consideration is needed between the interrelationship of the Act with other public sector duties and their compliance, assessment and reporting frameworks and roles of different commissioners. In particular looking at how the Act could act as a conduit for these other duties. This could for example reduce reporting burdens across duties through amalgamating reporting requirements, helping free up public bodies resources and ensure that reports consider interrelationship and balancing of different duties.

Auditing the Act

Work is needed to review how the Well-being of Future Generations Act is being implemented in practice within performance audits by Audit Wales and in the approach they take when undertaking these performance audits.

During the early years some work was undertaken to focus on some of the ways of working, e.g. Pembrokeshire Coast National Park Authority – Review of Involvement (published in 2020), however, since then Audit Wales have reverted to a more traditional approach to audit, e.g. Pembrokeshire Coast National Park Authority – Income Diversification | Audit Wales. Over the past 5 years the only audit focused on the Act was the recent audit on setting Well-being Objectives - Pembrokeshire Coast National Park Authority – Setting of Well-being Objectives.

Some aspects of ways of working have been considered as part of other audits. However, exploration, interpretation and conclusions drawn are often impacted by current audit approach giving more weight to Section 41 (Studies for improving economy etc in services) of the Public Audit (Wales) Act 2004 than Section 15 of the Well-being of FutureGenerations Act. Wider work is needed to look at Value for Money through the prism of the Well-being of Future Generations act, considering also what should be looked at beyond value for money in terms of 5 ways of working. This would support both Audit Wales and Public Bodies in terms of audit process and ensuring the Act is having positive impact on quality of audits and subsequent learning and performance improvements.

If you require any additional information, please do not hesitate to contact me.

Yn gywir,



Tegryn Jones
Prif Weithredwr



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Rydym yn croesawu cael
gohebiaeth yn Gymraeg, a
byddwn yn ateb gohebiaeth yn
Gymraeg. Na fydd gohebu yn
Gymraeg yn arwain at oedi.

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Ymateb gan: Cyngor Bwrdeistref Sirol Conwy | Evidence from: Conway County Borough Council

Well-being of Future Generations (Wales) Act 2015: Post-legislative scrutiny

Submission by: Conwy County Borough Council



Conwy - Sir flaengar sy'n creu cyfleoedd

Conwy - a progressive County creating opportunity

How far has the intended objective of the Act been achieved?

It would be ambitious to expect that the long-term aspirations of the Act would have been achieved within its first decade. In relation to the 5 ways of working our view is:

- **Collaboration.** There remains a complex web of collaborations, some of which work well, others do not but are obliged to continue owing to statutory requirements. Collaboration can be restricted by short-term grant allocations and statutory obligations that require significant bureaucracy.
- **Involvement.** There is a commitment to involvement, although it is still challenging to engage all areas of the community with limited investment. A lot of proposals involve amalgamation, closure, moving or amending services in order to modernise, protect, or make a service sustainable. Engaging on budget setting and increasing council tax or fees is incredibly challenging owing to the complexity of the accountancy system, and the inevitable need to increase costs owing to inflation and underfunding.
- **Prevention.** There is a commitment to prevention, but again, owing to budget cuts, there is a need for invest to save to push service focus from reactive to preventative. We have some excellent examples, particularly in terms of flood coastal defence and social care provision.
- **Long-term.** Again, there is a commitment to long-term, but further assistance is needed to help local authorities with future trends. We are restricted in Conwy owing to the current budget formula, which does not sufficiently recognise our older population and future trend forecasts for an increasing elder population.
- **Integration.** We have embedded the principles of the act well within our business processes. It is positive to see that other public sector organisations are now included within the statutory obligation, but there is a great deal more work to be done to look across the well-being goals through a collective public sector lens. But again, we are severely hampered by capacity and budget to do so.

In so far as the objective of the Act is to improve the social, economic, environmental, and cultural well-being of Wales, we would question whether we are any further forward as a nation. Significant national and global challenges have played their part to disrupt the

successful course of the Act, and in a worsening climate for public sector finance, we are in a spiral of managed decline against increasing threats.

A great deal of good work has been done in support of the environment over the last decade. However, this has been more in response to the climate / nature emergency and the push towards Net Zero by 2030 than anything to do with the Well-being of Future Generations Act. There have also been positive moves in support of the Welsh Language, but it is unclear to what extent this is as a result of the Act.

Any action which should be taken to improve the effectiveness of the Act and its implementation, including any specific drafting issues.

The overly-prescriptive arrangements surrounding Public Services Boards are entirely ineffective and add no value when there are alternative more flexible collaborations where senior leaders talk. In an overcrowded partnership landscape with no resources and limited capacity, PSBs struggle to add any value or benefit to their communities. Formalising these previously voluntary networks of public service partners has not worked and too much is expected of them. We would recommend that these are stripped out of the legislation. The requirements of the legislation surrounding Well-being Assessments are also proving to be burdensome, particularly at five-yearly intervals. Conducting an assessment of local area needs prior to determining local well-being objectives is important, but there are less-onerous ways in which this could be achieved, or alternatively they need to be appropriately resourced like they are with the regional social care partnerships.

We work with colleagues in other partnerships where we can, but there is silo working in Welsh Government in the way some collaborations are prescriptively funded and others are not funded sufficiently. Grants can be so prescriptive and short-term, they limit innovation.

The Well-being of Future Generations Office appears to be well funded, and we welcome the 2025 report that acknowledges the need to simplify partnerships and invest in the public sector, which is at breaking point. However, we would question the lack of connection to the 13 PSBs and view that they are all well established. The 50 recommendations are well intended, but do not reflect the fact that many are already being worked on or are overly simplified – for example, increase public engagement to build

trust. We are conscious that this response may appear overly cynical – be assured we want to make change, we want to improve services, but we cannot stress enough how debilitating the current financial situation is, and in that respect the Act has limited impact. There appears to be a view in the consultation slides that momentum is about more buy in. This is not so, there is buy in – we really want to innovate (and we have some great examples), but funding pressures and short-term financial budget setting, and prescriptive grants and legislative requirements are really restricting us.

Whether the review and reporting requirements under the Act are being met.

We are satisfied that the Well-being Objectives aspect of the legislation work well. We have been aligned to the well-being goals for the last 10 years and we're confident that the Act is known and referenced in our business processes. We have good evidence that our objectives are actively reviewed and reported upon regularly at a local authority level. However, we would again question their value at the level of the Public Services Boards. Enthusiasm for, or engagement with PSB Well-being Plans and their annual reports is limited, and again, add no lasting community value.

The effectiveness of guidance made under the Act.

Some aspects of the guides are useful where clarification of expectation is required, but for the most part they are overly-prescriptive, particularly with regards to the preparation of the Well-being Assessments.

How far the Act has been legally binding and enforceable.

We believe that local authorities have done their utmost to adhere to the spirit of the legislation. However, more broadly we don't feel that the Act is given prevalence over meeting short-term needs. The Well-being of Future Generations Commissioner's Office are a friendly team, but in terms of adding value since 2016, our reflections are that the office have showcased good practice but at times have added further bureaucracy requirements when information is readily available in annual reports. Likewise, we do not feel the journey checker, in its various guises, adds any value. The role of the Welsh Government's Local Partnerships team in this space is also confusing and neither are well connected to regional arrangements.

How far the Act has represented, and will continue to represent, value for money.

In impact assessing decisions and projects from the perspective of future generations, we do believe that the Act encourages consideration of long-term value for money alongside futures thinking. However, the amount of officer time and capacity wasted on supporting the ineffective Public Services Boards structure (including Well-being Assessments) nationally is considerable, notwithstanding the annual PSB Support Grant that adds to the administrative burden, and the criteria for which prevents any truly beneficial projects to be brought forward.



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Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol | Equality and Social Justice
Committee

Ymateb gan: Trafnidiaeth Cymru | Evidence from: Transport For Wales

Jenny Rathbone MS
Chair of Equality and Social Justice Committee
Senedd
Cardiff Bay
Cardiff
CF99 1SN

06 January 2025

Dear Jenny Rathbone MS,

FUTURE GENERATIONS WELLBEING ACT

On behalf of Transport for Wales, as its Chief Transport Planning and Development Officer, please find below some evidence to support the Equality and Social Justice Committee’s inquiry on post-legislative scrutiny of the Well-being of Future Generations (Wales) Act 2015. I hope that this letter also helps inform our oral evidence session on Monday, 7 July 2025.

Earlier this year, TfW published its well-being objectives and a well-being statement as part of our commitment to the Well-being of Future Generations Act (WFG): Well-being goals | Transport for Wales. Despite only becoming a recognised public body last year, we have been embedding the Act through our everyday processes, operations, people, and culture long before our formalisation as a named body.

We have a dedicated internal team who govern the application of our well-being objectives across the organisation and provide support to colleagues to implement the principles and ways of working. We view the WFG Act as feeding into all our roles and responsibilities at TfW, and we must collectively consider the long-term





impact of our decisions and work better with people, our communities, and each other. Our approach to sustainable development is key to our work, so we are eager to support the Committee's post-legislative scrutiny.

At TfW, we believe the WFG Act has played a crucial role in embedding sustainable thinking into the operations of public bodies across Wales. The Act encourages long-term decision-making that considers social, economic, environmental, and cultural well-being, which we are incorporating into our strategies.

We have found the Future Generations Commissioner and team to be entirely supportive in our development of our strategies. In addition, we have found that the Commissioner's reports have provided us with useful information from its comprehensive reviews and overviews of progress. They provide important context and set out the Commissioner's ambitions and expectations.

In addition to such reports, we believe that establishing clearer evaluation criteria would enhance accountability of those within the scope of the Act and ensure that we are all effectively measuring our contribution to long-term well-being. Such criteria would be especially useful for organisations such as TfW, where the breadth of our activities mean that we are developing and fostering many partnerships supporting many different aspects of sustainable transport.

Furthermore, to better support the alignment of how different organisations are applying the Sustainable Development Principles, there would be benefit in strengthening common accountability mechanisms. For example, by establishing clear and measurable common standards, we would be able to effectively benchmark for performance and create certainty that we are implementing the principles of the Act effectively.

The guidance provided under the Act has significantly helped TfW understand our obligations. It has also supported the integration of well-being objectives into corporate policies, leading to positive changes in governance and strategy development. Despite this, there are still some challenges in interpreting and applying the guidance. We believe the provision of tailored sector-specific support and practical examples, could improve clarity and facilitate better implementation across all public sector bodies.

So, by addressing ambiguities in the legislative drafting of the Act, there would be increased clarification on expectations for public bodies. This would help to improve compliance by ensuring that all organisations have a clear understanding of their obligations and the standards they need to meet, especially when working collaboratively and in partnership with other organisations.

Although the WFG Act sets out legally binding duties for public bodies, we believe that the enforcement mechanisms largely depend on self-regulation and oversight by the Future Generations Commissioner. In practice, this means that while public bodies are required to follow the Act's principles, there are limited consequences for non-compliance. Strengthening enforcement frameworks by introducing clearer consequences for failing to meet well-being objectives could encourage greater



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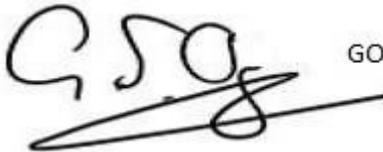
adherence and accountability.

Ultimately, many of the factors outlined in this letter feed into how the Act has represented value for money. We believe the Act encourages significant long-term benefits by encouraging public bodies to adopt preventative approaches rather than reactive policies. By focusing on sustainability and long-term well-being, the Act can help reduce costs associated with short-term, crisis-driven decision-making.

While the Act represents good value for money in principle, its effectiveness depends on how well it is implemented and monitored. Improved efficiency in implementation and clearer measurements of social, cultural, economic, and environmental impact could further demonstrate its value. By strengthening reporting and impact assessments, there will be a clearer picture of how effectively public bodies are meeting the Act's objectives and delivering tangible benefits to future generations.

I hope that this letter provides you with an initial understanding of TfW's perspective and experience on the effectiveness and impact of the Wellbeing of Future Generations (Wales) Act 2015, so far. I look forward to delving into the detail on these points in our oral evidence session in July. If you have any questions in the meantime, then please do not hesitate to get in touch.

Yours sincerely



GO

Geoff Ogden
Chief Transport Planning and Development Officer

Senedd Cymru | Welsh Parliament

[Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol](#) | [Equality and Social Justice Committee](#)

Ymateb gan: Chwarae Cymru | Evidence from: Play Wales

Equality and Social Justice Committee

SeneddEquality@senedd.wales

Well-being of Future Generations (Wales) Act 2015: Post-legislative scrutiny

About Play Wales

Play Wales, the national charity for play in Wales, advocates for the right and need for all children to play. Our key areas:

- raising awareness
- promoting good practice
- providing advice and guidance across all sectors.

Our work includes:

- Policy: Working with others to inform the development of policy and other children's play issues
- Information service: Promoting the value of children's play by providing timely and current information
- Advice and support: Providing specialist knowledge about all issues that affect children's play
- Workforce development: Contributing to the professional development of the playwork and play workforces.

We worked closely with the Welsh Government to develop its *Play Policy*¹, *Play Policy Implementation Plan*² and on its groundbreaking play sufficiency legislation. Section 11 of the Children and Families (Wales) Measure 2010³ places a duty on local authorities to assess and secure sufficient play opportunities for children in their area.

¹ <https://play.wales/wp-content/uploads/2023/03/Play-Policy.pdf>

² <https://play.wales/wp-content/uploads/2023/03/Play-Policy-Implementation-Plan.pdf>

³ <https://play.wales/play-policy-legislation/play-sufficiency/>

We also drafted the report for the Ministerial Review of Play Steering Group (2022) and accompanying background paper.⁴

Play Wales is pleased to have an opportunity to input into this inquiry. Our contribution is informed by the work of the Ministerial Review of Play.

The importance of play for health, wellbeing and happiness

Playing is central to children's physical, mental, social and emotional health and wellbeing. When they play, children contribute to their immediate wellbeing and to their own development.

There is a well-established body of solid evidence⁵ that shows the contribution that play, particularly self-organised play, can make to children's long-term and immediate wellbeing, to their physical health and to their mental health and resilience. Various studies have concluded that play:

- supports socialisation: when they play children interact with others, develop friendships and attachments with peers, deal with conflict, and learn respect and tolerance.
- builds resilience: playing boosts children's emotion regulation, confidence, creativity, enabling them to cope with stress and challenges throughout life.
- is crucial for good health and wellbeing: being active through play helps children physically and emotionally, contributing to their health and happiness.
- supports children to feel part of their neighbourhoods and wider communities: playing allows children to learn about the world around them, make connections, and develop a sense of identity and belonging.
- supports learning and development: building the structures of the brain and skills such as critical thinking.

Playing is the most natural and enjoyable way for children to be active, keep well and be happy. It is fundamental to children's wellbeing and healthy development as articulated in the Welsh Government Play Policy.

Internationally, the importance of play is recognised and protected in the United Nations Convention on the Rights of the Child (UNCRC). Article 31 of the UNCRC explicitly states that the child has the right to play and to join in other recreational activities and that States Parties should recognise these rights. The United Nations' General Comment no. 17 on Article 31 provides further guidance on the

⁴ <https://www.gov.wales/written-statement-ministerial-review-play-publication-steering-group-report>

⁵ Russell, W., Barclay, M. and Tawil, B. (2024) *Playing and being well. A review of recent research into children's play, social policy and practice, with a focus on Wales*, Cardiff: Play Wales.

legislative, judicial, administrative, social and educational measures necessary to ensure its implementation.

Ministerial Review of Play

In November 2019, the then Deputy Minister for Health and Social Services decided to take forward a Ministerial Review of Play. The aim of the review was to assess the Welsh Government's work with respect to play policy and to inform how the Welsh Government develops and progresses the play agenda. The review considered the progress made in achieving the Welsh Government's vision for play, as articulated in its *Play Policy*, and sets out a number of key recommendations that need to be implemented.

The review was managed by the Play Policy Team within the Childcare, Play and Early Years Division of the Welsh Government. The review took a collaborative approach, recognising the knowledge and experience of key stakeholders in identifying and understanding the issues and in looking at options for the future. A cross-professional steering group of play and playwork specialists and policy officials from across the Welsh Government was set up to support the review.

Ministerial Review of Play: Alignment of key legislation impacting on the right to play theme

As part of this review, the steering group identified a range of sector specific national legislation, policies, initiatives that support children's play. The review considered the need for alignment of national play policy and the Play Sufficiency Duty to other key primary and over-arching pieces of legislation – including the Well-being of Future Generations Act (Wales) 2015.

The *Ministerial Review of Play Background Paper*⁶ highlights that successful implementation of the Play Sufficiency Duty aligns well with the both the five ways of working and the seven wellbeing goals of the act. We draw the committee's attention to pages 15 to 18 of the *Ministerial Review of Play Background Paper*.

Supporting children to play can help in realising the aims of other policies. Equally, other policies can facilitate this by explicitly including the Play Sufficiency Duty and children's play in guidance and strategies.

Play sufficiency and integrated approaches

Four small-scale research studies, commissioned by Play Wales, have been undertaken since the commencement of the Play Sufficiency Duty⁷. The research studies have applied an assets-based approach to play sufficiency, by articulating throughout the reports that play is what children do when the conditions are right and establishing it as their way of maintaining their own health and wellbeing.

⁶ <https://www.gov.wales/sites/default/files/inline-documents/2023-10/ministerial-review-of-play-background-paper.pdf>

⁷ See Play Wales website: [Play Sufficiency Research](#)

This is most evident in the 2020 study⁸, which aligns the process of play sufficiency with the approach taken in the Well-being of Future Generations Act (Wales) 2015, the Social Services and Well-being Act (Wales) 2014 and by Public Health Wales, highlighting that ‘an assets approach identifies factors that support good health and well-being and relies on working locally with communities’.⁹

Implementation of the play sufficiency process has required meaningful engagement with children and relied on a view that sees children as competent individuals with capacity to influence positive developments with regards to their play. Across Wales, as part of statutory Play Sufficiency Assessments, children have provided views about their opportunities to play¹⁰ and when supported to do so can provide rich knowledge and information about their neighbourhoods. Actively engaging with children gives us an opportunity to take an assets-based approach to meeting children’s play needs.

Play and Well-being Plans

Public Services Boards (PSB) are required to analyse and assess the economic, social, environmental and cultural wellbeing of their areas and plan together to improve and deliver on the wellbeing of those areas.

Through Play Sufficiency Assessments, local authorities must assess report progress on a range of criteria, including:

- A named person on the Local Public Service Board who champions children’s play
- The extent to which the Play Sufficiency Assessment and Play Action Plan contribute to, and are incorporated within, the Well-being Plan.

Considering play in local wellbeing assessments can help public bodies to identify and reach wellbeing goals for children and communities. However, our analysis of Play Sufficiency Assessments indicates that how this works in practice varies across Wales.

Application of the Play Sufficiency Duty

As mentioned earlier, the Children and Families (Wales) Measure 2010 places a legal duty on every local authority in Wales to assess and secure sufficient play opportunities for children in their area. The Ministerial Review of Play discussed the limitations of the duty applying to local authorities only. Key recommendation 6 of the review was for the Welsh Government to consider applying the Play Sufficiency Duty more widely to include a range of other bodies.

⁸ Russell, W., Barclay, M., Tawil, B. and Derry, C. (2020) *Making it Possible to do Play Sufficiency: Exploring the conditions that support local authorities to secure sufficient opportunities for children in Wales to play*, Cardiff: Play Wales.

⁹ Cited *ibid*, p.16.

¹⁰ Dallimore, D. (2022) *What children say about play in Wales*, Cardiff: Play Wales.

Mindful that extending statutory Play Sufficiency Duty to other bodies beyond local authorities would require legislative change, the review recommended the establishment of a Play Sufficiency Charter (or similar) and actively encourage a commitment to the Play Sufficiency Duty by public bodies that are not included in it.

In its Ministerial Review of Play progress report¹¹, the Welsh Government commits itself to commission a review to consider progress against play sufficiency statutory duties and identify key themes. The report notes that this will help inform exploration on the potential development of a Play Charter and the Ministerial Review of Play Steering Group Report recommendation of widening the scope of the statutory duty.

Conclusion

All four play sufficiency research studies recognise that the Play Sufficiency Duty and the supporting documents produced by the Welsh Government – regulations, statutory guidance, and toolkit – agree that: play is what children do when the conditions are right and establishing it as their way of maintaining their own health and wellbeing. Every aspect of children’s lives is influenced by their urge to play, and self-directed, self-determined playing increases children’s opportunities to build their own resilience and support their own health and wellbeing.

The Well-being of Future Generations (Wales) Act 2015 requires public bodies in Wales to take a joined-up approach, helping to create a Wales we all want to live in, now and in the future. Successful implementation of the Play Sufficiency Duty aligns well with the act’s five ways of working and its seven wellbeing goals. The duty should be explicitly incorporated into guidance for wellbeing assessments at national and local levels to help public bodies identify and reach wellbeing goals for children and communities.

The synergy between the benefits of a successful Play Sufficiency Duty and the wellbeing goals of the Well-being of Future Generations (Wales) Act 2015 can and should be optimised, through more explicit guidance for wellbeing plans. Many of the act’s wellbeing goals and indicators resonate with the Play Sufficiency Duty and spatial justice for children, including a Wales that is healthier, more equal, has coherent communities, has a vibrant culture and thriving Welsh language and is globally responsible. For example, making neighbourhoods more child-friendly by reducing traffic volume, traffic emissions and the space that cars take up would support many of the wellbeing goals as well as spatial justice for children. Although it might be assumed that children are included in the indicators relating to safe and cohesive communities, public bodies are unlikely to think about children’s very different relationships with their neighbourhoods unless they are explicitly mentioned.

Explicitly incorporating play and the Play Sufficiency Duty into wellbeing guidance at national and local level can help public bodies to identify and reach wellbeing goals for children and communities.

¹¹ <https://www.gov.wales/ministerial-review-play-progress-report-february-2025-html#:~:text=The%20Ministerial%20Review%20of%20Play%20Steering%20Group%20Report%20made%20key,people%20sufficient%20opportunities%20to%20play>

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Play Wales is a registered charity no. 1068926

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Ymateb gan: Tai Pawb | Evidence from: Tai Pawb



promoting equality in housing
hybu cydraddoldeb ym maes tai

Tai Pawb

Response to:

“Well-being of Future Generations Act Consultation”

For Equality & Social Justice Committee

June 2025

For further information about this paper please contact:

Name: Hannah Crackett
Position: Policy Coordinator
Email: [REDACTED]
Telephone: [REDACTED]



Who we are

Tai Pawb (housing for all) is a registered charity and a company limited by guarantee. The organisation's purpose is, "To Inspire Wales to be a Fairer Place to Live" with a mission to promote equality and social justice in housing in Wales. It operates a membership system which is open to local authorities, registered social landlords, third (voluntary) sector organisations, other housing interests and individuals.

What we do

Tai Pawb works closely with the Welsh Government and other key partners on national housing strategies and key working groups, to ensure that equality is an inherent consideration in national strategic development and implementation. The organisation also provides practical advice and assistance to its members on a range of equality and diversity issues in housing and related services, including QED – the equality and diversity accreditation for the housing sector.

For further information visit: www.taipawb.org

Charity registration no. 1110078

Company No. 5282554

1 Introduction and background

1.1 Tai Pawb welcomes the opportunity to respond to this consultation and strongly supports the ambition and vision of the **Well-being of Future Generations (Wales) Act (WBFGA)**. We commend the Act's focus on sustainability, intergenerational justice, and long-term thinking and consider it a source of national pride, reflecting our shared values of equity, community, and social justice.

- 1.2 Despite this, we believe that the full potential of the WBFGA cannot be realised without the incorporation of the **right to adequate housing** into Welsh Law. Without secure, affordable, and adequate housing for all, the goals of the Act will remain aspirational rather than fully actionable and enforceable.
- 1.3 Tai Pawb, alongside the **Chartered Institute of Housing Cymru (CIH)** and **Shelter Cymru**, advocate for the incorporation of this right through the [Back the Bill campaign](#). Our evidence demonstrates how incorporating the right to adequate housing into Welsh Law would ensure a fairer, more resilient Wales in the long-term.
- 1.4 We believe incorporation of the right to adequate housing (and human rights more generally) could empower the WBFGA and demonstrate how aspirational values can be delivered upon in tangible ways and transform lives.

2 What is the right to adequate housing?

- 2.1 The right to adequate housing is a recognised international human right, enshrined in the **UN International Covenant on Economic, Social and Cultural Rights (ICESCR)**. It comprises of the following essential elements:
- Availability of essential services and infrastructure (for health, security, comfort, and nutrition)
 - Affordability
 - Accessibility
 - Habitability
 - Legal security of tenure
 - Location

- Cultural adequacy
- 2.2 The right challenges us to reframe the value we place on housing at a fundamental level. Housing is not an asset; it is a human right central to our shared well-being. A human-rights based approach is a holistic one. It recognises that housing is more than a roof over one's head; it is intrinsic to good health, educational attainment, community cohesion, economic participation, environmental stewardship and personal dignity.
- 2.3 Enshrining housing as a human right in law is not just an ethical duty, it provides a framework for practical, measurable, and enforceable decision-making. A right-based approach aligns priorities, resources, and stakeholders to ensure efficiency and effective action. It would catalyse change at a systemic level, necessary to achieve progress at the rate and scale we need.
- 2.4 The case for incorporation is well-evidenced, grounded in research (including examples of how it is already working internationally) and mapped into the Welsh context. Our campaign provides the following supporting documents:
- [Feasibility Report](#)
 - [Alternative White Paper](#)
 - [Road Map for Implementation](#)
 - [Independent Economic Evidence Base Analysis](#)
 - [Independent Economic Cost-Benefit Analysis](#)

3 The Well-being of Future Generations Act: a decade on

- 3.1 Tai Pawb applauds the vision and ambition at the heart of the WBFGA. As an organisation striving to make Wales a more equitable place, we

fully condone the consideration of those not yet born within all public decision-making and have encouraged public discourse regarding the Wales we want to be. We recognise the principles of long-termism, prevention, collaboration, participation and integration as crucial to enabling equitable outcomes.

3.2 But we cannot ignore that housing-related outcomes have worsened over the past ten years:

- [Record numbers of people, including children, living in temporary accommodation](#)
- [Homelessness figures continue to rise, particularly amongst young people and marginalised groups](#)
- [Growing social housing waiting lists and lack of new supply](#)
- [Many people live in overcrowded, unsafe or unaffordable homes, especially in the private rented sector](#)

3.3 Wales is in a deep and worsening housing crisis. Whilst we support the Act, it is clear its aspirational values have not impacted our housing crisis as hoped. As it stands, for too many people in Wales housing remains insecure, unaffordable, or inaccessible. The Act is currently not robust enough to secure housing as a right and deliver the systems change needed in Wales.

3.4 Events over the past decade, such as the [COVID-19 pandemic](#), have only underscored how critical adequate housing is for public health, economic resilience, and social cohesion. A [2020 report](#) by the CIH found that 77% of people support the notion that housing should be a legal right in Wales.

3.5 Whilst policy developments such as Rapid Rehousing are important and strongly welcomed, they will not address the deep structural issues of supply and inadequacy. Without embedding housing as a human right,

we believe progress across all well-being goals will remain fragile, uneven, and ultimately, unjust.

4 How the right to adequate housing supports the Act

4.1 The incorporation of the right to adequate housing into Welsh Law would provide a robust legal and ethical foundation for housing policy and strategy, while advancing the WBFGA's sustainable development principles. It would ensure decisions are not vulnerable to political cycles, but are shaped by a forward-looking, rights-based framework that promotes consistency and accountability. It would help to implement the **five ways of working** embedded in the Act:

- **Long-term:** Grounding housing policy in rights creates a lasting framework for future generations
- **Integration:** Recognising housing as central to achieving all seven well-being goals
- **Involvement:** Empowering individuals and communities to participate in decisions that affect their homes
- **Collaboration:** Uniting sectors around a shared rights-based goal
- **Prevention:** Addressing the root causes of disadvantage and inequality through secure housing

It would also strengthen progress towards each of the Act's **seven well-being goals**:

4.2. A more equal Wales

Housing inequality disproportionately impacts people who already face structural disadvantage:

- Black, Asian and Minority Ethnic communities are [overrepresented](#) in homelessness and overcrowding statistics
- Disabled people face a severe lack of accessible housing, with the EHRC Wales in 2018 highlighting a '[hidden crisis](#)' in provision
- Refugees, asylum seekers and migrants face [systemic discrimination](#) and barriers to safe housing
- Women, especially single mothers and survivors of domestic abuse, are often [trapped](#) in unsafe housing due to a lack of alternatives and unaffordable rents in the private sector
- LGBTQ+ youth are [four times more likely](#) to experience homelessness
- Young people are unable to access stable housing and unable to remain in their communities due to [lack of opportunity](#)
- Older people are increasingly isolated and living in [deteriorating or unsuitable](#) homes due to lack of support

Incorporating the right to adequate housing requires a joined-up housing strategy that meets the needs of all disadvantaged groups. It would ensure that local and national housing policy tackles inequality. We believe incorporation also represents the fastest route to ending homelessness.

Considering a more diverse range of needs at planning level would support the delivery of more inclusive housing such as multigenerational homes and improved sites for Gypsy, Roma and Traveller communities, ensuring that everyone, regardless of background, can feel they belong in Wales.

4.3. A healthier Wales

The link between poor housing and poor health is well established. [Public Health Wales](#) estimates that housing-related issues cost the NHS £95 million every year. Our [independent analysis](#) indicates that investing in housing could

save the NHS up to £1 billion and generate over £5.5 billion in wider savings over 30 years through sustained improvements in public health and well-being.

Safe, warm, and stable housing enables people to live independently for longer, engage meaningfully in work and community life, and avoid preventable health conditions. It gives children a fair start in life and reduces the long-term burden on public services. To alleviate the significant pressures faced by the NHS, and improve the Nation's health in general, we must properly address the role housing plays in public health.

4.4. A Wales of cohesive communities

Adequate housing represents more than a roof over one's head; it provides living conditions that are secure, safe and foster a sense of belonging.

Embedding a right to adequate housing would ensure planning processes actively involve diverse communities in shaping their neighbourhoods. It would reinforce the idea of shared ownership over the spaces we inhabit, giving every person a stake in their community. This approach aligns closely with the wider aspirations of the WBFGA.

Our [independent cost-benefit analysis](#) estimates £1 billion will be saved by reducing crime associated with poor housing. It would also help us to reduce loneliness and social isolation, which are of growing concern in Wales.

4.5. A prosperous Wales

Inadequate housing prevents people from fully participating in the economy. It undermines efforts in education and employment, and keeps people trapped in cycles of poverty. It also places a heavy financial burden on public services, diverting resources into crisis management rather than transformative action. Our [independent cost-benefit analysis](#) estimates up to £1 billion in educational

and economic benefits over 30 years, which would boost the economy and drive sustainable change to future-proof systems.

A rights-based approach would also support the delivery of low-carbon homes in locations that provide access to jobs, schools, services and green spaces which aligns it with the **20-minute neighbourhood** concept.

4.6. A resilient Wales

The housing sector accounts for around [21% of Wales's carbon emissions](#). Poorly insulated homes, inefficient heating systems, and unsustainable developments present a major environmental challenge. Incorporating the right to adequate housing would catalyse investment in greener construction methods and support our transition to net zero.

It would also encourage public participation in environmental decision-making and ensure the climate is no longer seen as a “fringe issue”. By linking these issues together, we can better protect our planet for future generations.

4.7. A Wales of vibrant culture and thriving Welsh language

The housing crisis has had a profound impact on Welsh-speaking communities, particularly in rural areas where lack of opportunity and access to affordable homes, often due to [second home ownership](#), force younger generations to leave. Incorporating the right to adequate housing would support efforts to maintain the cultural and linguistic identity of these communities by ensuring more homes are available for people to, not just remain living where they grew up, but thrive there. Strengthening all Welsh communities helps maintain Welsh identities and a sense of collective pride.

4.8. A globally responsible Wales

By incorporating the right to adequate housing, Wales would send a clear message that we take our international obligations seriously and represent global leaders in human-rights. We would evidence our agreement with the **UN's Sustainable Development Goals** and position social justice and equity at the heart of our governance, for now and into the future. This step would very clearly align with the tone already set by the WBFGA, demonstrating that Wales is a country of forward-thinking, responsible and ethical citizens.

5 Looking ahead: accountability and implementation

5.1 Incorporating the right to adequate housing into Welsh Law will embed accountability and action and protect efforts from political cycles. It would:

- Drive investment and the return of housing to a fundamental mission of government
- Enable the Senedd and the judiciary to hold Ministers and public bodies to account
- Require joined-up, strategic targets for the delivery and monitoring of housing adequacy
- Reinforce both formal and informal mechanisms with legal clarity, transparency, and recourse

5.2 Our [Back the Bill](#) campaign outlines how this right can be implemented through [progressive realisation](#), where change is pursued in a sustainable, planned, and fully resourced way. It acknowledges that transformation will not happen overnight, but crucially, works to prevent apathy, build momentum, and inspire hope; an approach closely aligned with that of the WBFGA.

5.3 Right now, human rights are increasingly under threat around the world. Wales has an opportunity to lead by example and fully embed human rights as the foundation of how we govern. Whilst proposed homelessness legislation and further implementation of the WBFGA are welcome, without a strong rights-based foundation, they risk being undermined. The right to adequate housing can drive the systems change our housing in Wales requires, to deliver on the aspirations of the WBFGA.

6 Call to action

6.1 Tai Pawb calls for the **right to adequate housing to be incorporated into Welsh Law within the next Senedd term and return housing to a fundamental mission of government.**

7 Conclusion

7.1 The Well-being of Future Generations Act is a visionary and pioneering piece of legislation, well aligned with Wales's legacy of social justice and support for human rights. Tai Pawb is fully committed to supporting its success.

7.2 However, for the Act to truly fulfil its potential, we believe it must be underpinned by the incorporation of the right to adequate housing into Welsh Law. Housing is the foundation from which all other well-being outcomes flow. Without safe, secure, and affordable homes, progress on health, equality, the environment, social cohesion, economic prosperity and the preservation of Welsh culture will be limited and disjointed.

7.3 Incorporation demands a sustainable whole-systems approach, which will enable fulfilment of the goals and adherence to the principles of the



promoting equality in housing
hybu cydraddoldeb ym maes tai

Act. Incorporation is not just the right thing to do, morally and practically, it is crucial to the future success of the Act.

Senedd Cymru | Welsh Parliament

[Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol](#) | [Equality and Social Justice Committee](#)

Ymateb gan: Race Equality First | Evidence from: Race Equality First

Race Equality First: Evidence Submission to the Post-Legislative Review of the Well-being of Future Generations (Wales) Act 2015:

Introduction and Context:

Race Equality First (REF) is a Cardiff-based charity with nearly 50 years of experience in tackling discrimination and hate crime and promoting race equality as a fundamental human right. We assist those who have experienced discrimination and hate crime across all nine of the protected characteristics outlined in the Equality Act 2010 and all five recognised hate crimes strands in the UK. We also offer a more general advocacy service for people from a minority ethnic background. We run training on race awareness, cultural awareness and how to report hate crime and discrimination. We also provide anti-racist learning and development resources for organisations (including in the form of training and anti-racist action plans for organisations to implement). We have also led the Welsh civil society response to the UN Committee for the Elimination of Racial Discrimination (CERD) to inform the Committee of the extent of racial inequality in Wales, most recently in August 2024. We are also conducting research alongside Professor Matthew Williams of Cardiff University, who is considered one of the world's leading experts on hate speech and hate crime, to understand why hate crime prosecutions are so low in Wales, despite consistent high numbers of reports to the police. We also run numerous different activities across Wales, from cooking classes to women's only swimming sessions, and we offer a counselling and mental health support service also. As a result of our work, we therefore have a strong interest in how the Well-being of Future Generations (Wales) Act 2015 is implemented to secure a fairer future for the minority ethnic communities of Wales.

Strengths of the Act – But a gap between aspiration and impact:

The Act is globally pioneering in its ambition to consider the needs of future generations and ensure sustainable and equitable development for current and future generations in Wales, with seven well-being goals that span equality, health, prosperity, resilience, global responsibility, culture, and community cohesion. Yet nearly ten years on, and the Act is still failing to achieve the system-wide change originally intended.¹ There is also a pressing need to ensure the Act ensures tangible, equitable outcomes for all communities, especially those who have been historically marginalised. Thus, REF welcomes this post-legislative review as an opportunity to embed race equality more explicitly within the Act's framework and implementation to improve the lives of minority ethnic people in Wales.

¹ Audit Wales., (2025). [No time to lose: Lessons from our work under the Well-being of Future Generations Act](#), p.4.

Race Equality First: Evidence Submission to the Post-Legislative Review of the Well-being of Future Generations (Wales) Act 2015:

The Future Generations Commissioner's latest report warns that Wales faces an "*unrecognisable future*"² without urgent action to protect the environment and to tackle poverty and ill health. These long-term challenges – from climate change to entrenched inequality – undoubtedly hit the most vulnerable communities hardest. Yet Commissioner Derek Walker has been "*frustrated at progress*" so far, and Audit Wales likewise finds that the Act is still failing to achieve the "*system-wide change*" originally intended.³ For minority ethnic communities, who disproportionately experience poverty, ill health, and exclusion, this lack of transformative change means the Act's promise of a "More Equal Wales" is far from fulfilled. For example, recent Welsh Government data shows that there was a 50% likelihood of people whose head of household comes from a Black, Asian, or Minority ethnic background living in relative income poverty – more than double the rate for those whose head of household comes from a White ethnic background (22%).⁴ This clearly demonstrates that we are not yet on track to achieve a "More Equal Wales" for future generations. While the language of sustainability and long-term thinking is now more common in public policy, at least in Wales, for minority ethnic communities, the lived reality of systemic disadvantage – higher poverty rates, poorer health outcomes, employment discrimination, and racism – persists.

The Missing Link: The need for a clearer focus on race equality in the Act and integrating the Act with Anti-Racist Wales Commitments:

The principle of well-being for all future generations must be intentionally applied to address persistent systemic racial inequalities in Wales. Currently, the Act does not explicitly name race equality within its well-being goals or ways of working, which we argue has led to inconsistent attention to issues that impact minority ethnic people. To truly realise its goal of a "More Equal Wales," public bodies need much stronger guidance and obligations to consider race.

The Anti-Racist Wales Action Plan (ARWAP) and its 2024 update set out a clear, government-backed roadmap for Wales to become an anti-racist nation by 2030. REF strongly recommends that the Well-being of Future Generations Act and the ARWAP be more explicitly integrated to ensure meaningful impact.

Many of the changes we believe are necessary to strengthen the Act's impact on race equality – such as improved recording of ethnicity data, clear targets for reducing racial disparities, culturally competent public services, and stronger scrutiny – are already included in the ARWAP. Yet, these two major frameworks are not sufficiently connected in implementation, reporting, or accountability.

To use healthcare as an example – REF's own work shows that minority ethnic people face barriers accessing health services (particularly mental health services), experience racism in healthcare settings, and are often excluded from the design of health programmes.⁵ The ARWAP includes a clear focus on health equity, highlighting how systemic racism contributes to continued poor health outcomes and unequal access to care for minority ethnic people. This directly supports the Act's goals of a "Healthier Wales" and a "More

² [Future Generations Report 2025](#). See also: Messenger, S., (2025). Wales facing unrecognisable future, warns commissioner, [The BBC](#).

³ *Ibid*. See also: Audit Wales., (2025). [No time to lose: Lessons from our work under the Well-being of Future Generations Act](#).

⁴ Welsh Government, (2024)., [Relative income poverty: April 2022 to March 2023](#).

⁵ Race Equality First, (2024)., [Joint NGO Shadow Report on Racial Inequality in Wales](#), p.63-69.

Race Equality First: Evidence Submission to the Post-Legislative Review of the Well-being of Future Generations (Wales) Act 2015:

Equal Wales.” Yet, health inequalities persist, and culturally competent healthcare remains inconsistent while the Audit Wales report specifically highlights that the health system in particular has some way to go in applying future generations thinking across its planning and delivery.⁶

Furthermore, evidence suggests that the quality of equality and impact assessments under the Act is inconsistent. Audit Wales found that the information in impact assessments is frequently out-of-date or insufficient, and crucially, its review of Equality Impact Assessments (EIAs) in 2022 highlighted that diverse groups were not being involved often enough in shaping decisions.⁷ REF is deeply disappointed and frustrated that many public bodies in Wales are not adequately applying the Act’s ways of working to ensure minority groups have a voice, as, if people from minority groups, including minority ethnic people, are not at the table when well-being plans and policies are developed, those plans are far less likely to meet their needs.

This failure reflects a wider issue with the non-binding nature of the Act – which is discussed in more detail later in this evidence submission. For example, while the Future Generations Commissioner urges that “public bodies *should* actively embed [the five ways of working] by involving the public and members of staff meaningfully in shaping decisions, paying particular attention to those who have been traditionally excluded from decision making positions – such as people who are Black, Asian and Minority Ethnic, LGBTQIA+ and disabled,”⁸ the use of the word “*should*” rather than “*must*” underscores the Act’s lack of enforceability. It also highlights the over-reliance on goodwill, rather than accountability, in applying the Act’s principles. REF believes this contributes directly to inconsistent implementation and undermines the credibility of the Act’s promise to deliver a more equal Wales.

Welsh Government and oversight bodies must ensure that minority ethnic stakeholders are actively engaged in the planning, delivery and review of well-being objectives. Thus, we recommend the following:

- The Well-being of Future Generations Act be explicitly embedded within the ARWAP as a delivery mechanism and well-being plans must explicitly link to the goals and actions in the ARWAP to implement and achieve equity for minority ethnic people in Wales.
- The Well-being of Future Generations Act must be explicitly aligned with the UN International Convention on the Elimination of All Forms of Racial Discrimination (ICERD), to fully reflect Wales’s international human rights obligations to eradicate racial discrimination. Accountability for the Act’s implementation must also be considered in light of Wales’s commitments under ICERD – including the substantive articles of the Convention and the concluding observations issued during periodic reviews by the Committee on the Elimination of Racial Discrimination (CERD). This would help ensure that the Act not only supports domestic policy coherence, but also contributes meaningfully to international standards on race equality and anti-racism.
- The collection of ethnicity data remains inconsistent – mandate the systematic collection and disaggregation of data by ethnicity for all areas relevant to the well-

⁶ Audit Wales., (2025). [No time to lose: Lessons from our work under the Well-being of Future Generations Act](#), p.7.

⁷ Audit Wales., (2025). [No time to lose: Lessons from our work under the Well-being of Future Generations Act](#), p.35.

⁸ See: [Future Generations Report 2025](#), p.124.

Race Equality First: Evidence Submission to the Post-Legislative Review of the Well-being of Future Generations (Wales) Act 2015:

being goals. Explore ways in which the Act and the Commissioner's team could progress and monitor the implementation of this further across Welsh public bodies, as without such data, public bodies cannot adequately plan or evidence progress.

- Require public bodies to include specific, measurable, achievable, relevant, and time-bound (SMART) targets related to race equality within their well-being objectives and plans, and with this, ensure that public bodies link up their well-being objectives and plans to their strategic equality plans.
- Meaningful engagement with and involvement of minority ethnic groups in the design and delivery of public services' well-being plans remains inconsistent – explore ways in which the Act and the Commissioner's team could progress and monitor the implementation of this across Welsh public bodies. Public Services Boards must be required to engage minority ethnic communities in the co-production of well-being plans; additionally, consultations on well-being plans must proactively seek out minority ethnic voices – through translated materials, community champions, and outreach in trusted spaces.

Scrutiny and Accountability:

The Act's current reporting and scrutiny mechanisms are not sufficiently focused on race equality. Under the Act, public bodies are not required to report on outcomes by ethnicity. At present, public bodies' annual well-being reports seldom break down outcomes by ethnicity. This lack of demographic detail can mask disparities. The Act's own national indicator set includes measures directly relevant to inequality (such as the poverty rate gap for protected characteristics), but not all public bodies report against these at a local level. Future statutory guidance must require that reporting be disaggregated by ethnicity wherever possible. Linking this with the existing requirements under the Equality Act 2010 (including the Public Sector Equality Duty and Socio-economic Duty) would help ensure alignment between well-being and equality objectives.

REF believes that to improve this:

- The Future Generations Commissioner must be equipped and given a clearer mandate to assess and report on race equality outcomes.
- Annual reporting requirements under the Act must include ethnicity data and an analysis of how well-being objectives are delivering for different ethnic groups.
- Strengthen external oversight of the Act (especially as some public bodies, particularly in parts of the health sector, have given little or no explicit consideration to the Act, according to Audit Wales's recent report⁹).

Enforceability and Legal Impact:

⁹ Audit Wales., (2025). [No time to lose: Lessons from our work under the Well-being of Future Generations Act](#), p.7.

Race Equality First: Evidence Submission to the Post-Legislative Review of the Well-being of Future Generations (Wales) Act 2015:

When assessing the enforceability of the Well-being of Future Generations Act and its impact on protecting minority ethnic communities, it's important to acknowledge a fundamental challenge: the Act creates duties on public bodies that are collective and long-term in nature, essentially making them difficult to enforce through traditional legal mechanisms. Individuals cannot easily bring legal action for a breach of the Act in the way they might for a breach of the Equality Act 2010 for instance. Additionally, a senior barrister famously described the Act as, “*virtually useless*,” for citizens seeking to challenge decisions, noting that while the law’s guidance is full of aspirational language, in practice, “*individuals are not going to be able to use it.*”¹⁰ This stark critique highlights that the Act currently lacks direct avenues for redress if, for example, a public body’s action (or inaction) is failing future generations or perpetuating racial inequality. The Future Generations Commissioner has no power to sanction public bodies, only to advise and recommend. The Auditor General can examine and report, but again cannot compel compliance beyond making findings public. As a result, the legal provisions of the Act have limited bite when it comes to forcing change for the benefit of minority ethnic people (or any group of people).

The need for stronger legal enforceability is further demonstrated by Audit Wales’s finding that public bodies often adopt a ‘compliance mindset’ – doing the minimum to meet the Act’s formal requirements – rather than truly embracing the spirit of involvement and long-term prevention.¹¹ Such a mindset therefore easily allows for equality considerations to be treated as a tick-box exercise.

REF is therefore deeply concerned by the lack of meaningful justiciability of the Act and the way in which this has enabled some public bodies to adopt a compliance mindset. We feel that the Act’s promise to protect future generations, including those from minority backgrounds, will remain hollow unless enforcement is bolstered. There must be clearer consequences for non-compliance, however rather than making the Act directly enforceable through the courts, REF supports strengthening links with existing legal duties:

- Where public bodies fail to meet well-being goals related to equality, this should trigger review under the Equality Act’s Public Sector Equality Duty.
- Give the Future Generations Commissioner stronger investigative or enforcement powers – for instance, the ability to issue compliance notices or refer a public body to a legislative committee or even a tribunal if it persistently fails to meet its well-being objectives related to equality.
- Consider amendments to give the Act more “teeth,” such as enabling legal challenges or sanctions when public bodies fail to take the interests of future generations (and the interests of minority groups) into account.

In summary we recommend the following:

1. Embed and integrate the Well-being of Future Generations Act and the Anti-Racist Wales Action Plan into each other.

¹⁰ Martin, P., (2019). Law to protect future generations in Wales 'useless', [The BBC](#).

¹¹ Audit Wales., (2025). [No time to lose: Lessons from our work under the Well-being of Future Generations Act](#), p.14.

Race Equality First: Evidence Submission to the Post-Legislative Review of the Well-being of Future Generations (Wales) Act 2015:

2. Require public bodies to align well-being goals with legal duties under the Equality Act, the Public Sector Equality Duty, the Socio-economic Duty, ICERD, and the Human Rights Act.
3. Improve collection and use of ethnicity data across all well-being areas.
4. Set SMART targets related to race equality within well-being plans.
5. Mandate the participation of minority groups, including minority ethnic communities in well-being planning and service design.
6. Strengthen the Commissioner's mandate to monitor race equality outcomes.
7. Link well-being reporting to existing equality duties for accountability.

Conclusion:

The Well-being of Future Generations Act remains an important piece of legislation with powerful potential. But, for it to be meaningful for Black and minority ethnic communities in Wales, it must be more intentionally aligned with the Welsh Government's Anti-Racist Wales Action Plan and broader equality duties. This will not only strengthen delivery on race equality, but will make the Act's implementation more coherent, measurable, and impactful. We urge the Welsh Government to use this review to secure that alignment and help realise a truly fair and sustainable future for all people of Wales, regardless of their ethnicity.



Well-being of Future Generations (Wales) Act 2015- post-legislative scrutiny

1.0 Written evidence submitted by Natural Resources Wales

1.1 Natural Resources Wales (NRW) is a named public body under the Well-being of Future Generations (Wales) Act 2015 (WFG Act) and a statutory member of all Public Service Boards (PSBs). Our organisational well-being objectives include a focus on collective action towards nature's recovery, resilience to climate change and minimising pollution.

Our roles include being an advisor to Welsh Government, regulating industries and providing environmental licences, being the statutory nature conservation body for Wales, land manager for around seven percent of Wales, Category One emergency responder, statutory consultee (for planning applications and other statutory processes), and collaborator on environmental projects.

As the principal Welsh Government-sponsored environmental body, NRW plays a critical role in delivering the WFG Act at the national level. Its statutory purpose, pursuing the *sustainable management of natural resources*, is central to ensuring present and future generations have a Wales capable of meeting their social, economic, cultural and environmental well-being needs.

1.2 This evidence draws on input from policy leads, decision makers and practitioners across NRW. Our submission is organised around seven key issues aligned to the committee's terms of reference:

2.0 Key Issues

2.1 Key Issues

- **Social & Environmental Justice:**

There is some progress towards the sustainable management of natural resources and Wales achieving environmental aspects of sustainable development but it is too slow to meet the needs of current and future generations. Unless this is addressed, existing inequalities will become entrenched, perpetuating social injustice and limiting opportunities for communities to thrive.

- **Embedding the WFG Act into the Wider System:**
The Well-being of Future Generations (Wales) Act can only succeed if it is embedded across all relevant sectors. There must be a concerted effort to align environmental legislation, governance structures, funding mechanisms and public sector culture, so that sustainable natural resource management and environmental well-being are mainstreamed into everyday decision-making. Without this systemic shift, the Act's transformative ambitions will remain out of reach.
- **Linking Sustainable Management of Nature and Environmental Well-being:**
To operationalise the goals of the WFG Act, the link between the sustainable management of natural resources and environmental well-being must be clearly defined in legislation, guidance, and monitoring frameworks. This integration would provide practitioners with a coherent, consistent, and streamlined approach to delivering and assessing environmental outcomes, supporting more equitable and effective decision-making.
- **Empowering Public Services Boards (PSBs) for Local Action:**
Public Services Boards (PSBs) play a critical role in delivering well-being locally, but they often lack the capacity and resources to make a meaningful difference. Strengthening PSBs' capability to influence and direct resources would enable them to address local priorities more effectively, support community resilience, and tackle place-based inequalities.
- **Strengthening Climate Governance:**
Wales currently lacks a single, cross-sectoral climate change coordinating body, leading to fragmented and inconsistent action on climate. Establishing a dedicated climate governance organisation—or enhancing the Future Generations Commissioner's role to convene climate action—could help bridge this gap, ensuring a coordinated, inclusive, and ambitious response to climate risks that are already compounding social inequalities.
- **Integrated Land and Marine Use Framework:**
Developing a multifunctional framework for land and marine use is essential to navigate different land management and use options—such as food, energy, biodiversity, and climate resilience—and to maximise benefits for both people and nature. This strategic approach would also help address the unequal distribution of environmental harms and benefits, ensuring that disadvantaged communities are not left behind.
- **Maintaining a Proactive, Collaborative Approach to the WFG Act:**
Shifting towards an enforcement-led approach could risk undermining the Act's effectiveness by prioritising short-term compliance over systemic, preventative, and transformative actions.

The following section explores our key issues aligned to the committee's terms of reference.

3.0 How far the intended objective of the Act is being achieved.

- 4 **3.1 National Well-being** - NRW is required to assess the extent to which Wales is managing natural resources (and therefore as a nation maximising our contribution to the seven well-being goals) every five years in its State of Natural Resources Report (SoNaRR).
- 5 The two previous reports assessed the state of natural resources and found that Wales is not managing its natural resources in a sustainable way. They also found that our use of global natural resources is not sustainable or equitable.
- 6 Both reports explored the direct causes of this unsustainable management, such as pollution and climate change. They also described the indirect causes – human activities such as economic systems, technological developments, human behaviours and governance.

The second State of Natural Resources Report ([SoNaRR2020](#)), which you can find on our website, introduced the four aims of SMNR, using them to structure the assessment and to identify opportunities for action to improve the sustainable management of natural resources. This report concluded that Wales is not yet meeting the four long-term aims of sustainable use of nature. We highlighted the need for transformational change in the big socio-economic systems impacting on the environment, the three largest being the energy, transport and food systems.

Four years on from the last SoNaRR, the global challenges of nature loss, climate change, pollution and waste have intensified. Human activities continue to harm the ability of the planet to provide all that we need for our well-being. UN Environment Programme's Medium-Term Strategy, highlights how three interconnected crises – climate change, biodiversity loss and pollution – are putting global economic and social well-being at risk, and undermine opportunities to reduce poverty and improve lives. However, if we act together and act now, with the right responses we can repair the damage to our natural resources for the benefit of current and future generations in Wales.

The scale and causes of climate change was reiterated in 2023 by the UN Intergovernmental Panel on Climate Change. The 3rd UK Climate Change Risk Assessment has highlighted risks for Wales which require increased and urgent action. You can read our most recent SoNaRR interim report on our website.

6.0 Local well-being – Practitioners involved in delivering improvements to well-being at the local level through PSB partnerships consistently report that whilst the framework of collaborative governance created through the PSBs has led to improved ways of working between public sector partners, these partnerships are still failing to move the dial on well-being at the community level.

4.0 Any action which should be taken to improve the effectiveness of the Act and its implementation, including any specific drafting issues.

4.1 Proposed Legislation - In response to international commitments to address the

causes of environmental degradation, highlighted in the SoNaRR report, Wales plans to incorporate its commitments to the new UN Global Biodiversity Framework (GBF) through

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the Environment (Principles, Governance and Biodiversity Targets) (Wales) Bill. This Bill will establish statutory biodiversity targets and supporting indicators. In our response to the *Securing a Sustainable Future* white paper, we highlighted the need for greater accountability and more active reporting on the Section 6 duty in the Environment (Wales) Act 2016 across the public sector. We understand the new Bill aims to strengthen this duty and enhance accountability and reporting.

There is a strong correlation and clear synergy between the Well-being of Future Generations (Wales) Act and the GBF, presenting significant opportunities for Welsh Government and the wider public sector to work collaboratively to deliver the GBF's 2050 vision. Any redrafting of the WFG Act should give due regard to this connection to maximise delivery and avoid duplication. It is essential that future legislation and governance structures in Wales address the main drivers of biodiversity loss—such as unsustainable consumption, production, and inequalities—and that action is taken in line with the objectives of the WFG Act to ensure that environmental well-being improves alongside social, economic and cultural well-being.

6.0 Existing Legislation - The Planning (Wales) Act 2015 and the Environment (Wales) Act 2016 were designed to support the Well-being of Future Generations (Wales) Act 2015. Together, they establish a framework for considering how natural resource management contributes to well-being goals. However, Wales needs an integrated land use and marine framework, with consistent evidence and spatial data to fully realise these ambitions. A strategic, multifunctional approach, balancing different land and sea uses, would enable better use of natural resources and support well-being more effectively.

The Environment (Wales) Act's Area Statements and the WFG Act's Well-being Plans were intended to complement each other. In practice, implementation has suffered from misaligned processes and reporting cycles, leading to inconsistent and sometimes duplicated efforts. Area Statements would benefit from clearer policy direction which has been delayed in the current Senedd term. NRW are supportive of the recommendations made by the Climate Change Environment and Infrastructure Committee to ensure the Natural Resources Policy is up to date and capable of driving action for nature across the whole of government, with integrated policies that align with the Global Biodiversity Framework 2030 targets and wider goals.

Most biodiversity legislation pre-dates the nature emergency and works in isolation from the ecosystem approach enshrined in the Environment (Wales) Act. Given the nature emergency's threat to well-being goals, there is a need to strengthen the WFG Act's role in helping Wales to take a future proof view on building ecosystem resilience to deal with future threats and pressures to biodiversity and safeguards environmental well-being.

In terms of climate change, the Environment (Wales) Act 2016 sets decarbonisation targets, while the UK Climate Change Act 2008 provides the basis for reporting on climate risk and adaptation. Despite this, many public bodies lack clear mandates to take climate action, and most regulatory frameworks are not aligned with the climate emergency. This means that climate action often relies on policy rather than legislation, making collaboration challenging.

Before the WFG Act, the Climate Change Commission for Wales fostered collaboration on climate action and developed Wales' first Climate Change Strategy. It also provided a forum for collaboration and support for delivery of climate action with a wide range of organisations. These functions were not passed onto the Office of the Future Generations Commissioner via the WFG Act. Wales therefore currently lacks a single coordinating body for climate action, unlike other UK nations. This gap has led to fragmented efforts. Consideration should be given to creating a dedicated forum or expanding the role of the FGC Office to convene and coordinate climate action.

National Indicators and Assessments of Environmental Well-being -The SoNaRR report provides a valuable set of indicators to track progress towards sustainable natural resource management. Welsh Government should consider publishing complementary ecosystem service accounts aligned to the four long term aims of sustainable management. This could enhance local and national well-being assessments. Aligning new statutory biodiversity targets through the WFG Act would also help integrate ecosystem resilience into public sector delivery and reporting frameworks.

6.1 Partnerships - NRW is a statutory member of all 13 Public Services Boards (PSBs). The organisational landscape in Wales is complex and PSBs often struggle to operate in partnership whilst managing reduced capacity to deliver existing services. Practitioners often highlight that the lack of dedicated funding within these partnerships limits their ability to drive meaningful transformation in public sector services. NRW is not a member of other, better-resourced regional partnerships such as the Regional Partnership Boards (RPBs) and Corporate Joint Committees (CJCs). Considerations relating to Environmental Well-being are not always at the forefront of these other more well-resourced public sector partnerships. To strengthen environmental accountability and well-being integration across all partnerships, amendments to legislation should consider enabling PSBs to act as commissioners of well-being services from other public sector partnerships. This could include giving PSBs powers and duties to influence the budget and delivery of these more established partnerships, ensuring that spending is better aligned with local well-being needs.

NRW has worked closely with all PSB partners to improve understanding of how current and future climate risks within each locality will impact the well-being of both current and future generations. Since the latest well-being plans were published, all 13 PSBs have committed to undertaking more detailed local Climate Change Risk Assessments, with some using guidance produced by NRW in collaboration with Public Health Wales and the Welsh Government. The Public Health Wales Health Impact Assessment (HIA) on climate change (published July 2023) identified that disadvantaged communities are more vulnerable to climate-related risks, including flooding, heatwaves, and poor housing conditions in Wales. These communities often lack the resources and capacity to adapt, exacerbating existing inequalities. This underscores the need for targeted interventions to address the compounded vulnerabilities faced by these communities in the context of climate change.

PSB governance arrangements provide a valuable collaborative and statutory framework that could be instrumental in supporting collective action on climate impacts. However, at present, they are not being utilised to their full potential in this regard.

5.0 Whether the review and reporting requirements under the Act are being met;

5.1 We are not currently aware of any specific review or reporting requirements under the WFG Act that are not being met. However, the Committee may wish to consider whether these requirements sufficiently align with the overall objectives of the Act. For example, Public Services Boards (PSBs) are mandated to publish well-being assessments and plans according to prescribed timelines, and the Future Generations Commissioner is required to provide advice and guidance on setting well-being objectives three times over this period. Currently there is no legislative requirement for the Commissioner to track progress on the delivery of these objectives by PSBs. Enhancing this aspect could strengthen oversight and support more effective achievement of the Act's goals.

6.0 The effectiveness of guidance made under the Act;

6.1 New Statutory Guidance:

6.1.1 Land management options for well-being:

Section 2.0 above, highlights the challenge of managing land and sea for multiple benefits and deciding which mix of uses best supports the well-being goals. The Well-being of Future Generations (WFG) Act requires public bodies to consider all seven well-being goals but offers no clear method for considering the choices which decision makers need to take. While the Natural Resources Policy provides strategic direction, assessing how different land and sea uses contribute to well-being remains difficult.

While Welsh Government policy favours a more holistic assessment of well-being benefits, beyond purely quantitative methods like natural capital accounting, no alternative framework for evaluating the impact of different choices has been established.

Given that the drafting of the Environment Act 2016 was informed by New Zealand's Resource Management Act, Wales could learn from New Zealand's Living Standards Framework. This explicitly recognises the impact of different choices across domains (health, environment, housing) and uses multi-criteria analysis to evaluate spending impacts. Adopting similar guidance would help Welsh decision-makers better weigh land and sea use options against broader well-being outcomes.

6.1.2 Legislative Overlaps:

Area Statements, Well-being Plans and Local Green Infrastructure Assessments all involve community priority-setting, but clearer timelines, processes, and coordination are needed to avoid duplication and support effective local implementation.

The new Environment (Principles, Governance and Biodiversity Targets) (Wales) Bill will establish statutory biodiversity targets and a Wales biodiversity framework. Embedding the UK's GBF and forthcoming Wales National Strategy and Biodiversity Action Plan into WFG Act guidance would further strengthen delivery mechanisms.

6.1.3 Existing Statutory Guidance (SF3):

Beyond sectoral decarbonisation efforts, there is a need to better integrate area-based actions—via Area Statements and Public Services Boards (PSB) Well-being Plans and Reports—for coordinated action. [Back Page 238](#) This integration is critical to achieving the Welsh Government's commitment to a just transition.

Practitioners also seek clearer, consistent definitions of environmental well-being at the local level, supported by detailed, common data sets aligned with National Indicators and Environmental Well-being Assessments.

7.0 How far the Act has been legally binding and enforceable;

7.1 The Well-being of Future Generations (Wales) Act does not include legal enforcement powers and NRW has no experience of using the Act in an enforcement capacity. Fundamentally, the Act is designed to promote collaboration and partnership working, which does not align easily with an enforcement mandate. From NRW's experience, balancing enforcement with collaborative roles can be challenging, as the two approaches can sometimes be in tension. Moreover, introducing enforceable measures may risk undermining collaborative initiatives and encourage short-term models of delivery, which contradicts the Act's aim of fostering long-term cultural change. The Act is intended to progress at a pace shaped by civil society, supporting sustained and meaningful transformation rather than immediate compliance.

8.0 Conclusion

8.1 NRW is pleased to have contributed to the Equality and Social Justice Committee's review of the Well-being of Future Generations (Wales) Act. We recognise the role this inquiry plays in strengthening the integration of environmental well-being and sustainable management of nature within public sector decision-making across Wales. There is an inextricable link between sustainable natural resource management and environmental well-being. Sustainable management serves as a fundamental driver for maximising the Act's contribution to the well-being of both current and future generations. We hope this evidence supports the committee in identifying ways to enhance the WFG Act's impact

Response to the Post Legislative Review of the Wellbeing of Future Generations Act

This is a personal response to the Post Legislative Review of the Wellbeing of Future Generations (Wales) Act, based on my experience as Deputy Chair of the UK Sustainable Development Commission (2006-11) and Wales Commissioner for Sustainable Futures (2011-16). The latter role was as independent appointment by Welsh Government and was supported by Cynnal Cymru, the sustainable development charity.

Over this period, I provided independent advice to Welsh Government based on engagement with a wide range of stakeholders, chaired the Climate Change Commission and undertook annual reviews of progress against the sustainable development duty. I chaired the stakeholder group for the Wellbeing of Future Generations Act and led the “Wales we Want” national conversation that helped to shape the legislation. Since that time, I have not had a direct role in the implementation and you will receive evidence from those much more closely involved, although I am currently a member of the Future Generation Commissioner’s Audit and Risk Committee.

However, I hope my reflections on the origins and purpose of the legislation are helpful in the Committee’s post legislative review. The Committee may wish to consider from the evidence provided in the review the success of the legislation in respect of:

- Effectiveness of delivering the sustainable development duty
- Response to the Wales we Want
- Delivery of the sustainable development goals
- Establishment of the Future Generations Commissioner as a voice for future generations

The Sustainable Development Duty

It is important that the Committee sets this review in the context of the legal duties enshrined in the Government of Wales Acts of 1998 and 2006. This required Welsh Government to promote sustainable development and make it a central operating principle in its operation.

This principle has enjoyed strong cross-party support and formed a distinctive dimension of the devolution process.

The Wellbeing of Future Generations Act was designed to strengthen the delivery of this duty. The Act was based on lessons from the experience of delivering the sustainable development duty as set out in independent reviews, Wales Audit Office reports and my own annual reviews as Commissioner, which indicated:

- A lack of clarity and confusion as to what we meant by sustainable development
- Evidence of innovative silos but lack of joined up approaches
- Sustainable development was treated as a cross-cutting theme alongside others not as a central organising principle
- A cut and paste approach where the duty was included in introductions to policy documents but that was far as far as it went
- The Sustainable Development Scheme and reporting process ran parallel to the programme of Government and were not seen to be central policy
- The duty only applied to Welsh Government and had little traction across the public sector
- Our national Sustainable Development Indicators produced each August had little connection to policy or wider awareness.

The Act was designed to address key failings in the delivery of this duty, notably

- extending the legal duty beyond Welsh Government to public bodies
- providing a clear framework for what we mean by sustainable development, framing it in the context of future generations and setting out common goals, milestones and indicators
- setting out common ways of working – prevention, collaboration, integration, involvement and long term – that are the essential requirements for sustainable development
- recognising the need for integrated, joined up delivery through the establishment of Public Service Boards
- putting in place a system for holding public bodies to account and providing a voice for future generations through the establishment of a Future Generations Commissioner

But much more significantly beyond these mechanics it was about building a movement with a common sense of purpose – achieving our seven national goals through a common way of doing things, the five ways of working. A movement that would extend beyond the public sector bodies under the legislation to involve our communities and businesses.

This thinking was reflected in the name change from Sustainable Development Bill to the Wellbeing of Future Generations Act, so making the purpose much clearer and accessible. We also recognised that this involved a mindset and culture change which was going to take time. Success was not simply going to be measured in the effective bureaucratic implementation of the mechanics of the Act.

The Wales we Want

This was the context for the “Wales we Want” national conversation. An important, if imperfect, process to ensure that the legislation reflected the aspirations of citizens for future generations and build a consensus around our national goals. Critically the national conversation reflected the commitment to ensure the legislation was not just a top-down bureaucratic process that prescribed what should be done but instead enabled people to take ownership and facilitate community led action.

“This is an opportunity for us as a nation to speak our truth, to describe our experiences, to be clear about what is important to us and to lay out our hopes for where we want to be heading, to tell our story”

Michael Sheen speaking at the launch event

Looking back, probably the one of the most significant conclusions from the conversation was that people felt disconnected from the decision-makers that affected their daily lives as decisions felt removed, top-down and with no clear link to outcomes. The conversation highlighted that there was a long way to go in truly engaging and empowering people and communities with a strong sense of disengagement from decision making.

These findings put the principle of “involvement” at the heart of the legislation as one of the ways of working, strengthening the initial drafts reference to “engagement” to reflect the need for much deeper participation. *“Greater engagement in the democratic process, a stronger citizen voice and active participation in decision making is fundamental for the well-being of future generations”* was one of the seven foundations for the wellbeing of future generations set out the in [Wales we Want report of the national conversation](#). These foundations were embedded in the national wellbeing goals and indicators set out in the legislation.

The Sustainable Development Goals

These aspirations of the “Wales we Want” and the relationship to “World we Want” process that established the UN Sustainable Development Goals led to the formation of our national well-being goals, underpinned by milestones and indicators. This framework was intended to:

- provide a common vision and purpose across public bodies, aligning their objectives to the achievement of common national goals
- give a long-term perspective beyond electoral cycles
- establish common measures of progress, with annual reports
- go beyond public bodies, involving all sectors and communities
- directly link our national contribution to the UN SDGs

The effectiveness of the Act in focusing and mobilising action to achieve our goals as measured through the national indicators must be a key measure of success for the legislation.

The Future Generations Commissioner

The establishment of a new statutory, independent body was one of most visible elements of the legislation. It was designed to replace the existing non statutory support and advisory functions to provide a voice for future generations that could both support and challenge public bodies in delivering the intent of the legislation.

In developing the proposal for the new body, over 40, mainly non statutory, national institutions for sustainable developments were identified, providing decision makers with policy advice; undertaking stakeholder engagement and capacity building; and convening cross sector action. The decision to align this new role with the existing Commissioner structure created a world first with the establishment of the Future Generations Commissioner. A model which is now being adopted in other countries.

The Commissioner has a key role in overseeing implementation of the Act. In submitting evidence to the Bill Scrutiny Committee in 2014, I stressed that “the Commissioner’s role needs to be solutions focused, providing a capacity to convene competing interest groups and undertake independent reviews to support decision making. There is a danger that the office becomes overwhelmed with the processes associated with overseeing compliance across the public sector”

The requirement for the Commissioner to produce a progress report on behalf of future generations a year before the Senedd election was an important element of the legislation designed to link to the democratic process through informing political manifestos and the wider electorate.

Reflections on 10 years

The Committee will be reviewing the evidence from the range of reports undertaken over the last 10 years as well as receiving input from stakeholders who have been directly involved in the implementation. These will provide the Committee with feedback from the practical experience of implementation as to the degree to which these original objectives have been achieved.

I would very much endorse the submission of the Future Generations Commissioner, which sets out in some detail the lessons from the last 10 years and recommendations for the Committee to consider. Reflecting on this submission and reports from over the last 10 years, I would emphasise key points related to the original intent of the legislation :

1. The Act has succeeded in translating the sustainable development duty into a practical framework based on common principles and outcomes. The degree to which that framework has been effectively implemented has been dependent on the leadership required to embed within the culture of public bodies, as opposed to it being merely a compliance exercise. There are still cases where the requirements of the Act are complied with through a separate process, as opposed to being the basis of operational planning and reporting.
2. There is need for a greater focus on outcomes as reflected in progress against our national goals and indicators. They should form a golden thread through the programme of Government and the wellbeing plans of public bodies/service boards, but there has been a lack of alignment between the wellbeing goals being set by public bodies and our national goals.
3. There also remains a challenge to establish the indicators and associated milestones that underpin the national wellbeing goals as our measures of genuine progress beyond GDP. This is the basis for reporting on our progress as nation. The milestones should be markers of progress against our long term goals.
4. After 10 years it is important to revisit the common vision and purpose represented by the national goals, milestones and indicators. This should be part of a wider process to introduce more on going deliberative democratic models. Failure to deliver on the involvement principle will significantly undermine the intent of the legislation, as progress is dependent on achieving a common purpose across public, private and community sectors.
5. The link between sustainable development and the democratic process is critical as highlighted in the [Audit Wales report](#) . The legislation set out the requirements for the Future Generations report one year before the election. The aim was to inform political manifestos that would then translate into to how a future programme of government

would contribute to achieving our national goals. This was not achieved in the last election.

6. Public Service Boards were designed to deliver on this common purpose at a local level, breaking down silos and enabling integrated solutions. Their role seems to have had limited impact being too process driven and suffering due to increasingly complex partnership structures. Nevertheless, the principle underpinning their role still stands. Consideration should be given to enabling greater community led action and involving the private sector.
7. The Future Generations Commissioner's office has become globally recognised as an effective means of embedding a voice for future generations within a governance structure. The intent of the legislation was to establish an enabling role that could convene, support and challenge working alongside the Wales Audit Office function in overseeing implementation of the Act. It is important that the role continues to be solutions focused as opposed to merely being the monitor and enforcer of the mechanics of the legislation.

Our approach to delivering on the sustainable development duty has developed through a continual learning process since devolution. The Wellbeing of Future Generations Act was not the final answer. It was always a worry that the legislation became a static process and seen as too difficult or not a priority to review and revise, so becoming outdated and increasingly irrelevant. The Committee's review is timely and will hopefully lead to continual improvement and reaffirmation of the central role of the legislation in delivering the Wales we Want for future generations.

Finally, it is worth repeating my concluding statement to the 2014 Bill Scrutiny Committee. *"The Bill will not be a silver bullet that will address all our problems or make difficult decisions easy. It will though introduce mechanisms that improve our governance and decision making for the long term, so providing a better chance of meeting the intergenerational challenges that are beyond one term of Government and need the engagement of wider society."*

Peter Davies



10/6/2025

Senedd Cymru | Welsh Parliament

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol | Equality and Social Justice Committee

Ymateb gan: Cyngor Cymuned Llandochau | Evidence from: Llandough Community Council

On behalf of Llandough Community Council I am authorised to supply the following evidence to the Committee:

- a) The Community Council is not bound by the duty contained in the Act but does carry out a range of actions designed to support the implementation of the wellbeing goals.
- b) It is suggested that all community and town councils might be encouraged to adopt a scorecard approach in relation to its work in support of the Act and I am attaching a possible scorecard that could be used for this purpose.
- c) There is a need for increased and improved communication about the Act and its objectives.
- d) The Commissioner might usefully consider outreach meetings with community and town councils to encourage implementation of the wellbeing goals.
- e) All community and town councils and One Voice Wales should be encouraged to upload details of the Act and examples of how it can be implemented at the local level - The Commissioner could perhaps prepare a document for this purpose.

Kind regards,

Paul R. Egan BA, Chartered MCIPD, CiLCA, F. Inst. LM, FIPSM
Clerk to Llandough Community Council,

Llandough Community Council Score Card vs Future Generations Indicators

Indicators	Score 0-10 0 = No not know 1 = Not achieved 2 = Achieved	Score	Comment
01. Healthy babies		0	What is the target? Where do we get information for Llandough?
02. Healthy life expectancy		0	What is the target? Where do we get information for Llandough?
03. Healthy lifestyle (adults)		0	What is the target?
04. Air quality		0	What was our start point? What is the target
05. Healthy lifestyle (children)		0	What is the target?
06. Young children developing the right skills		0	What is the target?
07. School leavers with skills and qualifications		2	Assume pupils from Llandough school have right skills for next phase of education. Info. from school?
08. Adults with qualifications		0	What is the target? Census information?
09. Productivity		0	Not applicable?
10. Disposable household income		0	What is the target? Census information?
11. Innovative businesses		0	Not applicable?
12. Renewable energy		0	Number of homes with solar panels and/or number of households with green energy suppliers?
13. Healthy soils		0	What was our start point? What is the target
14. Global footprint		0	What does this mean - how does it apply?
15. Waste not recycled		0	Information from VoG?
16. Fair pay		0	What does this mean - how does it apply?
17. Pay difference		0	What does this mean - how does it apply?
18. People living in poverty		0	Census information?
19. People living in material deprivation		0	What is the target? Census information?
20. Pay set by collective bargaining		0	Not applicable?
21. People in work		0	What is the target? Census information?
22. People not in education, employment and training		0	Census information?
23. People feeling involved		2	Community Engagement Survey results?
24. Satisfaction with access to facilities and services		2	Community Engagement Survey results?
25. Feeling safe		2	Community Engagement Survey results?
26. People satisfied with where they live		2	Community Engagement Survey results?
27. Sense of community		2	Community Engagement Survey results?
28. Volunteering		0	Target? How to measure?
29. Mental well-being		0	Target? How to measure?
30. Loneliness		2	Coffee mornings/Community Engagement Survey results
31. Hazard-free homes		0	Target? How to measure? Fire fighters home visit survey?
32. Reducing flood risk to homes and businesses		2	Mitigated at Canon Walk? Planning application comments?
33. Energy efficiency of homes		0	Target? Survey required? Insulation, energy generation, etc..
34. Homelessness		0	Census information?
35. Participation in arts, culture and heritage		0	How do we measure?
36. People speaking Welsh every day		0	Target? How do we measure?
37. People able to speak Welsh		0	Target? New question for next Community Engagement Survey?
38. Participation in sporting activities		0	Target? How do we measure?
39. Professional standards in heritage collections		0	Not applicable?
40. Looking after our cultural heritage		0	Historical sites in Llandough - church?
41. Greenhouse gas emissions		0	Target? How do we measure?
42. Greenhouse gas emissions from global goods and services		0	Target? How do we measure?
43. Healthy ecosystems		0	Definition?
44. Biological diversity		0	Definition?
45. Water quality		2	Welsh water?
46. Active global citizenship		0	Definition?
47. Confidence in the justice system		2	Community Engagement Survey results?
48. Journeys by walking, cycling or public transport		2	Community Engagement Survey results/Active Travel VoG?
49. Housing costs		0	Definition?
50. People digitally included		2	Community Engagement Survey results?
Total Score		24	
Maximum possible score		100	
% vs Max possible score		24	%

Senedd Cymru | Welsh Parliament

[Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol](#) | [Equality and Social Justice Committee](#)

Ymateb gan: Rhwydwaith Iechyd a Llesiant Celfyddydau Cymru | Evidence from: Wales Arts Health and Wellbeing Network



Response to the Equality and Social Justice Committee Inquiry: Well-being of Future Generations (Wales) Act 2015 – Post-Legislative Scrutiny

To the Equality and Social Justice Committee

We welcome the opportunity to contribute to this post-legislative scrutiny of the Well-being of Future Generations (Wales) Act 2015. As the national sector support for arts health and wellbeing in Wales, we strongly advocate for the essential role of the arts in supporting the health and wellbeing of individuals and communities. The Act has **provided a pioneering framework for embedding cross sector sustainable development**, social cohesion, and cultural well-being into public policy.

We have welcomed their 50 recommendations published in this, the 10th anniversary of the Act, particularly their call for a Culture Bill, and the emphasis on prevention as a key principle, encouraging public bodies to take proactive measures to improve well-being rather than reacting to problems after they arise. In the context of arts and health, this approach has been recognized as a valuable tool for promoting mental and physical well-being while reducing pressure on healthcare services.

The key points relating to arts, health, and prevention under the Act include:

- **Social Prescribing:** The Act supports initiatives that integrate arts into healthcare, such as social prescribing, where individuals are referred to creative activities to improve mental health and social well-being.
- **Mental Health and Well-being:** Arts-based interventions have been highlighted as effective in addressing mental health challenges, including

dementia and Parkinson's disease, by fostering social connections and emotional resilience.

- **Community Engagement:** The Act encourages public bodies to collaborate with arts organizations to create accessible, inclusive programs that support well-being and prevent social isolation.
- **Long-term Sustainability:** By embedding arts into health strategies, the Act aims to create sustainable, preventative approaches that reduce reliance on medical interventions and improve overall quality of life.

The Role of Arts in Promoting Well-being

The **Act's commitment to cultural well-being** aligns directly with the objectives of the arts and health sector. Over the past decade, we have witnessed transformative impacts through creative engagement in health and social care settings, including:

- **Arts-on-Prescription Programmes** – Initiatives such as the Hywel Dda University Health Board's Creative Prescribing Discovery Programme, the HARBWR Project at Swansea Bay UHB, and the national Wellness with WNO Programme demonstrate the effectiveness of creativity in health and social care.
- **Mental Health & Chronic Illness Support** – Evidence from arts-based interventions in Wales shows improvements in mental health, social connectedness, and management of chronic conditions.
- **Community Well-being & Social Inclusion** – Arts activities have played a significant role in fostering resilience, empowerment, and community building, aligning with the **Act's Preventative Health Approach, and recommendations.**
- **The Memorandum of Understanding (MoU) – A Key Driver in Wales**

A particularly significant achievement in advancing arts and health integration in Wales has been the Memorandum of Understanding (MoU) between Arts Council Wales and the Welsh NHS Confederation. This partnership has:

- Strengthened collaboration between the arts, social care, third and health sectors.
- Enhanced strategic direction, ensuring the arts contribute meaningfully to public health outcomes.
- Supported evidence-based practice, reinforcing the positive effects of arts engagement on health and well-being.
- Levered collaborative and partnership working between Arts Council Wales, Public Health Wales, Welsh NHS Confederation, WAHWN, all 7 health boards and Velindre NHS Trust.
- An MOU between Arts Council Wales and Natural Resources Wales driving creative nature arts based interventions supporting individuals to improve their mental wellbeing through the natural environment and the arts

Opportunities for Strengthening the Act

While the Act has provided a strong foundation, further policy development and investment would enhance its impact. Key recommendations include:

- Formal recognition of arts and health interventions as core elements of preventative healthcare.
- Greater integration of arts in social prescribing across health boards.
- Targeted funding and resources to scale existing initiatives and embed arts-based approaches in healthcare policy and preventative approaches.
- Clearer reporting mechanisms to capture the social and economic benefits of arts and health programmes that can effect policy change.
- We also have concerns about how the Act is being enforced. Access to culture and the arts is still a postcode Lottery, and not all public bodies are

delivering on their Culture and Welsh Language goals. As one Health Board professional has said about arts and health and collaborative working under the Act “*tell us to do it, and we will*”.

Conclusion

The Well-being of Future Generations (Wales) Act 2015 has positioned Wales as an **international leader in sustainable development and cultural well-being**. We strongly urge continued policy support, investment, and strategic collaboration to ensure arts and health remain central to Wales’ vision for future generations. The MoU between Arts Council Wales and the Welsh NHS Confederation is a testament to what is possible when art, health, and policy work together. We look forward to further strengthening this interdisciplinary approach, ensuring that creativity continues to enrich the lives of people across Wales.

Angela Rogers

CEO, WAHWN



<https://wahwn.cymru>

CONSULTATION RESPONSE



Comisiynydd
Pobl Hŷn
Cymru
Older People's
Commissioner
for Wales

Senedd Cymru | Welsh Parliament

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol | Equality and Social Justice
Committee

Ymateb gan: Comisiynydd Pobl Hŷn | Evidence from: Older People's Commissioner for Wales

Senedd Equality and Social Justice Committee Well-being of Future Generations (Wales) Act 2015: Post-legislative scrutiny June 2025

The Older People's Commissioner for Wales (OPCW) welcomes the opportunity to contribute to the Senedd Equality and Social Justice Committee's consultation on the Well-being of Future Generations (Wales) Act 2015: Post-legislative scrutiny.

The Commissioner would like to offer the observations below.

The Future Generations Act has encouraged public bodies and others to think long-term more consistently. The governance and reporting responsibilities placed on relevant public bodies mean that discussions about sustainable development and the Act take place regularly. The Act is increasingly referenced by public bodies and understanding is improving which is positive.

However, while progress has been made, the Commissioner agrees with the Auditor General for Wales's recent assessment that "The Act is not driving the system-wide change that was intended".¹ Although the need to focus more heavily on actions that support prevention is well established and understood, public bodies often struggle to put this into practice as a result of immediate and short-term pressures, and due to the challenges of embedding culture change. This is understandable but more needs to be done to turn rhetoric into reality.

As a result, older people in Wales have not seen the improvements that are needed to wellbeing, health and access to services that it was hoped would result from the Act over the past 10 years. Greater focus is needed on older people in future discussions of the Act.

Changing some of the language and understanding around the Act more broadly could help to address this. The Act often appears to be interpreted as being mainly concerned with children, young people and generations not yet born, as opposed to the maturing of current generations into older generations: for example, children and young people becoming the working age population, the working age population entering retirement, etc. Older people also have a future, and this is not always appropriately recognised. Older people across Wales are key to the seven Well-being Goals and this should be reflected more prominently in the narrative, activity and progress around the Act.

It would be helpful to consider how to broaden the understanding of what is meant by 'future generations' in the Act. This might encourage greater progress towards the goals by the public sector workforce and more nuanced thinking about how the Act applies across different areas.

The Act still offers positive opportunities for change, greater emphasis on sustainable development, and an incentive to think differently and on a more long-term basis. There are also opportunities to use the Act to make progress on other agendas, for instance challenging ageism.

There is the potential to use the thinking around the Act to challenge prejudice against our future selves in addition to addressing the prejudice that can be experienced by current generations of older people. Ageism has harmful consequences and eradicating it would contribute to improving the prospects for current and future generations of older people as well as making progress on the Act's Well-being Goals.

Research from the Centre for Ageing Better found that internalised ageism leads people to believe themselves too old to progress at work or that they are too old to learn and train. People can also come to believe that old age means reduced physical and mental health with a corresponding tendency to engage in unhealthy behaviours such as smoking, drinking or being physically inactive. People who internalise self-ageist attitudes have worse medication compliance and are less likely to seek healthcare and to go for check-ups.ⁱⁱ

There are also opportunities to use the Act to bring together different generations, including older and younger people, more consistently to consider our shared future and the actions that can be taken on the Well-being Goals. An intergenerational emphasis could help to make the Act more effective.

The Act further presents a valuable opportunity to explicitly incorporate wider policy areas such as Age-Friendly Communities. By embracing age-inclusive design and planning, the Act can drive more cohesive, equitable communities that enhance quality of life for an ageing population while building resilience for future generations.

The recent Welsh Government announcement of making Wales a Marmot Nation also provides a chance to renew the effort needed to strive for greater progress against the Wellbeing Goals. The eight Marmot principles align well with the aims of the Act.ⁱⁱⁱ:

As with the Wellbeing of Future Generations Act, the emphasis of the Marmot agenda so far has mainly focussed on children and younger people. There is growing recognition that the Marmot principles and can should be applied to older generations too. The Older People's Commissioner looks forward to further conversations about how to ensure the most effective impact for older

people from the shared agendas.

There are good opportunities to build on existing awareness and developments of the Future Generations Act over the coming months and years.

The Commissioner agrees with the Future Generations Commissioner that more emphasis is now needed on outcomes rather than governance and processes and would welcome developments to address this.

Since starting her term, the OPCW has found the Future Generations Commissioner to be approachable, pragmatic and open to discussions on areas referenced in this response. Our respective teams have a positive working relationship and regularly discuss areas of shared interest.

The Commissioner hopes that this information is useful to the Inquiry.

Rachel Bowen

Director of Policy, Older People's Commissioner for Wales



ⁱ Audit Wales (2025), No time to lose: Lessons from our work under the Well-being of Future Generations Act. Available at: [No time to lose: Lessons from our work under the Well-being of Future Generations Act](#), p.4.

ⁱⁱ Centre for Ageing Better (2023), Ageism: What's the harm? Available at: [Ageism-harms.pdf](#), p.3.

ⁱⁱⁱ See Institute of Health Equity website: [Marmot Places - IHE](#).

**Senedd Equality and Social Justice Committee
Inquiry on Well-being of Future Generations
(Wales) Act 2015: Post-legislative scrutiny
Crisis response June 2025**



About Crisis

Crisis is the national charity for people facing homelessness across Wales, Scotland and England. We know that homelessness is not inevitable, and we know that together, we can end it.

Our South Wales Skylight provides direct one-to-one support to people who are at risk of or experiencing homelessness in Swansea, Neath or Port Talbot. We help our members find safe and affordable homes and support with accessing benefits, healthcare services and employment opportunities. We also offer a range of learning, social and wellbeing opportunities.

Our Wales Policy team works closely with Members of the Senedd from all parties, contributes to working groups and advisory groups, responds to consultations and calls for evidence, and connects with policy teams in other organisations in Wales.

Our Best Practice team works with local authorities, third sector partners, businesses and other organisations on a range of homelessness projects across Wales and Great Britain to identify, test and promote ways of ending homelessness.

We are passionate about working collaboratively across the sector to seek positive policy solutions to help end homelessness in Wales.

About this response

This response has been written by our Wales Policy team, and focusses on the Act in relation to homelessness, which is a progress indicator for the following goals: a prosperous Wales, a healthier Wales, a more equal Wales, and a Wales of cohesive communities.

Homelessness and the Future Generations Act

We welcome the preventative approach to homelessness outlined in the Future Generations Act. It encourages a data-led and collaborative working style across public services, which we believe is important in working towards ending homelessness and, in turn, achieving the aforementioned goals of the Act.

Despite this, the increasing number of people facing homelessness in Wales shows that the Act is not having its intended impact on homelessness levels.

The recent [Homelessness Monitor Wales](#) research indicated that homelessness in Wales has been rising more steeply than elsewhere in Great Britain.¹ Between April and September 2024, there were a total of 13,689 applications for homelessness assistance in Wales², and as of March 2025, 10,800 people were staying in temporary accommodation and 130 people were sleeping rough.³

While, of course, there are a multitude of factors contributing to the rise in homelessness and the Future Generations Act is not solely responsible for the prevention of homelessness, we felt it was important to note the increase in homelessness in response to this consultation.

We would welcome further exploration of how the Act can help to support ongoing and continued efforts across Wales to make homelessness rare, brief and unrepeatable.

Data-led approach to ending homelessness

The Audit Wales report on the Future Generations Act indicates that there are opportunities for councils and their partners to make better use of data to understand both the current situation on rough sleeping and predict future demand to prevent homelessness. At Crisis, we are supportive of this general approach to using and sharing data, which has been at the heart of our [Built for Zero](#) projects.

Built for Zero is a methodology that empowers local communities to come together to identify barriers to ending homelessness for specific cohorts of people experiencing homelessness locally and deliver solutions. It involves creating a “by-name” list to allow the community to record week-by-week who is experiencing homelessness locally, analysing that data to identify trends and cohorts of people who can be better supported locally to end or prevent their homelessness, and providing that analysis to a services improvements and executive team who can support changes to local services with the ultimate aim of ending all local homelessness.

Crisis is currently providing support to adopt the Built for Zero approach to several local authorities across England and Wales, including Rhondda Cynon Taf.

Regional working

It should be considered whether Regional Partnership Boards might be able to play a more prominent role in homelessness prevention and resolution as part of their role in the implementation of the Future Generations Act. We know that Regional Partnership Boards include places for housing representatives, but we wonder whether there could be more of an emphasis on utilising the Boards as a means to specifically to consider collaborative working to end homelessness.

In its White Paper on Ending Homelessness, the Welsh Government highlighted its intention to consider whether Regional Partnership Boards and the broader work of Public Service Boards and Area Planning Boards can better support regional collaborative working on homelessness.

This will be particularly important for the implementation of the Homelessness and Social Housing Allocations Bill, which will introduce new legal duties on public bodies to “Ask and Act”, identifying those who are homeless or at risk of homelessness, and acting, referring and co-operating as is appropriate within their remit.

¹ <https://www.crisis.org.uk/ending-homelessness/homelessness-knowledge-hub/homelessness-monitor/wales/the-homelessness-monitor-wales-2025/>

² <https://www.gov.wales/homelessness-april-september-2024.html>

³ <https://www.gov.wales/homelessness-accommodation-provision-and-rough-sleeping-march-2025.html>

As well as using Regional Partnership Boards as a vehicle to support this approach, we encourage policymakers to consider more broadly how this new legislation might connect with the Future Generations Act and its structures.

Further information

Thank you for taking the time to read this response. If you'd like to receive more information, please email Jasmine Harris, Senior Policy and Public Affairs Officer for Crisis in Wales:





	The Welsh NHS Confederation response to the Equality and Social Justice Committee inquiry on post-legislative scrutiny of the Well-being of Future Generations (Wales) Act.
Contact	Haleema Khan, Policy and Public Affairs Officer, Welsh NHS Confederation Haleema.Khan@welshconfed.org
Date	18 June 2025

Senedd Cymru | Welsh Parliament

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol | Equality and Social Justice Committee

Ymateb gan: Confederasiwn GIG Cymru | Evidence from: Welsh NHS Confederation

Introduction

1. The Welsh NHS Confederation welcomes the opportunity to respond to the Equality and Social Justice Committee inquiry on post-legislative scrutiny of the Well-being of Future Generations (Wales) Act.
2. The Welsh NHS Confederation is the only membership body representing all the organisations making up the NHS in Wales: the seven local health boards, three NHS trusts (Velindre University NHS Trust, Welsh Ambulance Services University NHS Trust and Public Health Wales NHS Trust) and two special health authorities (Digital Health and Care Wales and Health Education and Improvement Wales). We also host NHS Wales Employers and are part of the NHS Confederation.

How far the intended objective of the Act is being achieved

3. Regarding how far the intended objective of the Act is being achieved, our members believe the Well-being of Future Generations (Wales) Act has been successful in fostering a shared language and focus on sustainable development and well-being goals across public sector organisations. This common ground, reflected in Public Service Board's Well-being Plans, enables stronger partnership working across different sectors and aligns well with the vision and the aims of the Act.

4. In relation to cross sector working, the Act has provided the NHS, and specifically the Welsh NHS Confederation, with the legislative framework to work in partnership with a range of organisations to support the prevention and well-being agenda. For example, in September 2017, the Welsh NHS Confederation and the Arts Council of Wales signed our first Memorandum of Understanding (MOU) to support both the NHS and the arts to further embed the five ways of working within the Act. We have been working in partnership with the Arts Council of Wales to develop joint areas of work in furtherance of the shared goal of improving the awareness of the benefits that the arts can bring to health and well-being and creating a more equal, cultural and more sustainable Wales as required within the legislation.
5. NHS Wales organisations recognise that implementing the Act is a key part of core business, both on an organisational level and an individual level. Since the Act was introduced, NHS organisations have been working to deliver innovative care models which help to create long-lasting and positive change to current and future generations.

Any action which should be taken to improve the effectiveness of the Act and its implementation, including any specific drafting issues.

6. Our members have highlighted some actions that could be taken to improve the effectiveness of the Act and its implementation.
7. The key challenge remains the tension between the Act's long-term strategic vision and the immediate operational and fiscal pressures facing public sector bodies. This disconnect often limits the capacity of organisations to fully align with the Act, particularly in high-pressure environments where current acute demand on services necessitates a fundamental shift from a reactive, illness-focused model to a proactive one centred on prevention and early intervention.
8. However, while our members are currently responding to significant demand on services, they do support the focus on prevention and the need to shift thinking to prevention and the longer-term as set out in the recently published [Well-being of Future Generations Report 2025](#). The report advocates for ringfenced prevention budgets and a transition to long-term funding arrangements, focusing on proactive measures which can mitigate future health crises and reduce long-term costs. It also highlights the importance of addressing socio-economic determinants of health and encourages public bodies to adopt a long-term perspective by developing 50-year strategies to promote sustainable development and inter-generational fairness. Many of the recommendations within the Future Generations Report 2025 align with our calls for the Senedd election.
9. Following a survey of 95 NHS leaders, we published a report, [Building the health and well-being of the nation](#), which outlines the key areas for political parties' to consider ahead of the 2026 Senedd election. The report sets out our mission, developed with NHS leaders, to "*build the health and well-being of the nation, supported by high-quality health and social care services and a partnership-led approach to population health and well-being that embraces the public, private and third sectors*". To achieve this mission,

we have called on the next Welsh Government to deliver a cross-government national strategy to improve health and well-being and reduce inequalities. This will shift the focus from simply treating illness to promoting health and well-being, reducing inequalities and tackling the wider determinants of health, boosting economic growth and supporting people to be active partners in their own health and well-being. We have also called for changes to performance and financial frameworks by publishing a joint health and social care performance and financial framework for seamless care and support. This framework would support an emphasis on prevention, effective treatment and timely support for individuals.

The effectiveness of guidance made under the Act.

10. Our members state that while the guidance provided by the Act and the Commissioner's office offers a valuable framework for consistent, evidence-based planning, its effectiveness is significantly hampered by several factors, including competing priorities and limited workforce capacity hindering the effective implementation of associated plans.
11. Recently [Audit Wales](#) observed that the Act has not yet driven the intended system-wide change, noting inconsistent application across public bodies, particularly within the health sector. This inconsistency is further compounded by the proliferation of partnership bodies and reporting requirements, which have created a complex governance landscape that can impede the effective achievement of the Act's objectives.
12. The Welsh NHS Confederation [welcomed](#) the Audit Wales and Future Generations Commissioner for Wales reports, agreeing with their emphasis on growing population needs, long-term planning, prevention, and the wider determinants of health. While acknowledging that the health system still has work to do in implementing the Well-being of Future Generations Act, more extensive cross-sectoral action and long-term financial and delivery approaches are needed to scale up good examples.
13. Public bodies frequently face limitations in capacity and resources, making it difficult to always fully apply the Act's principles. Their immediate, short-term needs often overshadow the investment and capacity required for long-term, preventive strategies. Furthermore, the existing complex governance structure, characterised by numerous partnership bodies (including Public Services Boards and Regional Partnership Boards) and extensive reporting demands, potentially jeopardises the Act's effective implementation.
14. Ultimately, achieving the Act's ambitious goals necessitates a significant cultural shift within public institutions, including within the Government and election cycles. This requires prioritising long-term well-being over immediate gains, a transformation that may prove challenging without targeted leadership, dedicated training initiatives and additional resources.

How far the Act has been legally binding and enforceable.

15. Our members have stated that the collaborative relationship between the NHS and the Commissioner's Office/ the Welsh Government is characterised by its constructive and open nature, with a preference for addressing issues through early engagement rather than through enforcement. However, members are concerned that making the Act more legally enforceable could inadvertently lead to negative consequences, potentially disrupting this collaborative approach. This highlights a desire to continue fostering a spirit of cooperation as Wales strives for a healthier and more sustainable future.

How far the Act has represented, and will continue to represent, value for money.

16. Our members emphasise that the Act offers substantial long-term value for Wales, fostering a more sustainable public sector model. Its core strength lies in its ability to embed shared values and working practices across various sectors.
17. However, the challenge is system redesign: aligning daily operations and services with the Act's longer-term goals. Without the Act, this work would be significantly more difficult, and our members highlight that the continued support by the Commissioner's office and the Welsh Government should be commended.
18. In relation to the Welsh NHS Confederation, over the last couple of years we have increasingly worked in partnership with the Office of the Future Generations Commissioner, including monthly meetings on areas of joint work and participating in, and speaking at, our respective events. This has ensured the Commissioner is aware of the key challenges for NHS leaders and improved our understanding of the Commissioner's priority areas of influence and how the legislation is being implemented across the public sector in Wales.

Further comments

19. In conclusion, the Well-being of Future Generations Act is at the cornerstone of work for our members. As a key partner across Public Service Boards, NHS bodies, collaborate with communities, environmental, educational, healthcare, social services, and economic systems to shape the conditions for the population. Creating healthy environments, strong public health infrastructure, and social equity are essential for preventing ill-health, reducing health inequalities, and promoting longer, better-quality lives.
20. The Welsh NHS Confederation is committed to the Act and works with our members to evidence how NHS organisations in Wales are implementing the Act. Since the Act's implementation, NHS organisations in Wales have been developing innovative care models to create lasting positive change for both current and future generations. We published resources, such as [Implementing the Well-being of Future Generations Act in Wales](#), highlighting various projects and initiatives undertaken by NHS organisations as part of their journey to adopt the Act's principles. These efforts involve starting with minor adjustments and progressing towards more substantial transformations.

21. Moreover, our members have emphasised that the Act had introduced five core principles that fundamentally change how Welsh health and care services operate to meet community needs.
- The **Voice and Control** principle enshrines local accountability, democratisation, and accessibility, ensuring communities have a direct say in service management, engagement, and oversight.
 - The **Prevention and Early Intervention** drives a crucial "shift left" by focusing on addressing the root causes of ill-health and complex social problems, aiming to prevent negative long-term outcomes and improve well-being.
 - The **Well-being** principle broadens the focus beyond physical health to include mental well-being, quality of life, community connections, and cultural identity, fostering a holistic view of health.
 - **Co-production** commits to building systems and services collaboratively with the communities that will use them, harnessing local energy and innovation alongside professional expertise.
 - Finally, **Multi-agency Working** creates a legal duty for organisations to collaborate across silos, sharing information and skills to meet the complex, multi-factorial needs of communities, recognising that collective action leads to more comprehensive solutions.
22. Through these principles, the Act empowers Welsh health and care services to collaborate more effectively, intervene earlier, and work directly with communities to build a healthier, fairer, safer, and stronger future for all.
23. For example, across Gwent a comprehensive policy environment, encompassing rules, regulations, strategies, and support programs, is in place to ensure equitable opportunities for health, productivity, and happiness for all residents, regardless of their location or background. While significant progress has been made, there remains a critical need to address persistent inequalities in opportunities and outcomes that have affected past generations and continue to impact many within the community today. It is an imperative to improve these conditions and collaborate more effectively with communities, viewing this as a duty to both present and future generations, demanding immediate action. The Act is central to this effort, enabling a focus on preventative approaches, upholding its five key principles, prioritising outcomes that matter to individuals and families, and emphasising the fundamental conditions that foster good health and well-being.
24. In today's challenging environment of increased service demands, rising population health needs, and global economic turbulence, the Well-being of Future Generations Act offers crucial and widely applicable support. Our members highlight that the goal is to build upon existing efforts and consolidate them to empower local communities.
25. Leveraging both the Marmot framework and the enabling power of the Act to combat health inequalities, embed prevention, foster community resilience, and encourage ownership of health and well-being initiatives is integral to create a healthier, fairer, safer, and stronger region for everyone. By working together to deliver the ambitions of the Act,

the current generation can strive to be the last to lament missed opportunities in addressing inequalities, thereby building a better future for those who will inherit Wales.

Ymateb gan: Cyngor Bwrdeistref Sirol Caerffili| Evidence from: Caerphilly County Borough Council

Caerphilly County Borough Council is pleased to provide this submission for use by the Senedd Equality and Social Justice Committee's Post-Legislative Review of the Well-being of Future Generations Act

The Well-being of Future Generations Act has been a keystone of the work of the council, providing a framework for how we plan and deliver services to our communities. The following are some examples of this in action.

Corporate Planning

- 1.1 The Council's Well-being Objectives were developed using the Sustainable Development Principle. The principles were used from the very beginning of the process ensuring the five ways of working were considered at each stage. The templates used, at workshops with Cabinet, Leadership and officers and throughout the development of each of the well-being objectives, included a section on the five ways of working where we explain how each informed the objective.
- 1.2 In the Corporate Plan we explain why we chose each objective (our Well-being Statement) and indicated how each objective links to the National Well-being Goals.
- 1.3 The process of developing out latest Corporate Plan began with an analysis of the research that emerged from the Well-being Assessment carried out by Policy colleagues in support of the Gwent Public Service Board's Well-being Plan. An extensive consultation process was carried out during the development of the Gwent PSB regional plan to identify what mattered to citizens across Gwent. More local research, data gathering and consultation feedback was used to better understand five specific community areas in Caerphilly county borough.
- 1.4 The Council's own well-being objectives considered all of the information that emerged from this extensive involvement exercise to ensure we did not duplicate and could focus on what 'additionality' we could provide. The Local Delivery Group, a sub-group of the Gwent PSB and mirroring its composition, considered how it could deliver the Gwent Well-being Plan at a local level. Its agreed priority areas are: Decarbonisation, Housing, Town Centre Regeneration and Employment. Further information is below.
- 1.5 The political commitments set out by the administration for the next five years were explored in detail during several Cabinet workshops which helped confirm the long-term vision in more detail. Officers then held consultations called 'the Caerphilly Conversation' to ask residents 'what mattered to them' in during the Autumn of 2022. This was both an online and face to face consultation, held in libraires and community places across the borough. Those initial 'What Matters' conversations

were then followed up with further consultation with residents that took place as part of the Council's budget setting process. Workshops were held with the Council's Leadership Team and Management Network. Individual workshops were then held for each draft well-being objective with a range of officers from a wide range of services through which actions, resources and potential ways of measuring success were identified. The emerging Plan was then presented to our partners through the Local Delivery Group to see how our draft objectives may impact their goals and to gain their feedback.

- 1.6 The Gwent PSB agreed to work towards becoming a 'Marmot Region' in 2022. The 'Building a Fairer Gwent report, written by the Institute of Health Equity detailed what health inequity looks like in Gwent and made a number of recommendations. The Gwent PSB formally recognised that inequality and inequity exists in our communities (for example in healthy life expectancy) and committed to take steps to address them at a collaborative level. Future Corporate Plans will consider the recommendations and the work of the Gwent PSB around this agenda going forward.

Regeneration Activities to Support a Sustainable Future

The following are some examples of council regeneration projects, some of which are supported by the Shared Prosperity Fund. More detailed information is available if requested.

Economic and Regeneration Strategy

- 2.1 The council has developed a new long term Economic and Regeneration Strategy incorporating a longer-term approach to cover the next 10 years, which aligns to the placemaking plans currently being developed for a number of our key town centres. Building on a 'Foundation for Success' this new strategy is intended to 'Nurture Future Success' and guide economic growth to 2035 in a post covid world and is cognisant of cost-of-living crisis and the external impacts on the local economy. It will help to coordinate the actions of multiple stakeholders with an interest in promoting and developing the economic well-being of the residents and businesses of the county borough.
- 2.2 The strategy is structured around a vision for the county borough with actions driven through three interconnected themes:
 - People
 - Place
 - ProsperityWith each theme is guided by the overarching objectives of sustainability and connectivity and complements the Council's Corporate Plan.
- 2.3 The council acknowledges that a long-term economic regeneration strategy is critical to ensure it can promote sustainable growth and development by addressing the underlying economic challenges, attract investment, and create job opportunities with the aim of improving the quality of life for residents. By focusing on long-term goals, the authority can plan and implement infrastructure projects, support local businesses, and enhance public services in a coordinated manner. The strategy provides a framework for informing actions whilst allowing the flexibility to adapt to changing economic conditions and the mitigation of potential risks.
- 2.4 The strategy includes an action plan and delivery strategy that provide targeted interventions for improvements to the county borough up to 2035 and has been

prepared following extensive data analysis and stakeholder dialogue to explore the current challenges and future opportunities for Caerphilly County Borough whilst supporting the authority's emerging Place Shaping Plan through its Place theme and within the context of the wider national, regional and local policies.

- 2.5 The county borough has an array of assets, such as its landscape features and cultural sites such as Caerphilly Castle. It is centrally located within the Cardiff Capital Region with strong links to the M4 and the South Wales Metro and is well placed to take advantage of regional growth and development.
- 2.6 The county borough does, however, have significant challenges, including some embedded generational challenges and areas of significant deprivation, especially in the north of the county borough, which perform poorly in terms of education, employment, health and access to services. Connectivity within the county borough and east/west across the Valleys is inefficient and does not enable some parts of the community to have sufficient access to employment, education and services.
- 2.7 The following ambitions have been identified under each of the themes:
- People
- Communities are connected, celebrated and valued by residents.
 - The workforce is skilled, engaged and motivated.
 - People are inspired to learn and engage with education and training to realise their potential.
- Place
- Caerphilly is an attractive place to live, visit and work.
 - Towns and villages are well connected with strong links within the Borough and the wider region.
 - The town centres are vibrant and diverse hubs of activity.
 - Caerphilly's landscape is protected and supports recreation and leisure activities.
- Prosperity
- The economy is strong and resilient, underpinned by a robust manufacturing sector and vibrant towns.
 - Technological innovation and new ways of working are encouraged and actively supported.
 - Centres of employment are connected to local communities with a choice of safe, reliable and sustainable transport options.
 - Caerphilly contributes to CCR's economic success through growth in Med Tech, The challenges identified are significant and wide ranging and cannot be overcome through the authority acting in isolation alone. It will require a coalition of stakeholder actions to work in harmony over the long-term working in the context of the strategic framework to achieve the overarching objective of Nurturing Future Success.
 - There is a recognition of the limitations of the authority's influence and control but by coalescing around regional and national objectives and policies the tools that the authority has with regards to planning, land ownership, transport infrastructure, supply chain spend, educational delivery and regeneration experience there is no reason that the challenges can be met head on and change can be delivered with a resourced and willing authority.
 - Pharmaceuticals and Advanced Manufacturing sectors.

- 2.8 The challenges identified are significant and wide ranging and cannot be overcome through the authority acting in isolation alone. It will require a coalition of stakeholder actions to work in harmony over the long-term working in the context of the strategic framework to achieve the overarching objective of Nurturing Future Success.

Placemaking Plans

- 3.1 In April 2025 the Council signed up to the Placemaking Charter. This recommitted the council to work it had already begun ensuring that the county borough's towns supported the communities that live there.
- 3.2 The Council has been developing placemaking plans for a number of its principal town centres to support the area-based masterplans. These masterplans set out the development and regeneration opportunities across a geographic boundary. The first placemaking plan developed for the county borough was the Caerphilly Town 2035 Placemaking Plan, followed by the Greater Blackwood and the Heads of the Valleys Regeneration Area Masterplans. These plans identify key opportunity areas for intervention and a number of underutilised or empty properties.
- 3.3 The Placemaking plans are frameworks to inform regeneration activity in support of the Welsh Government's "Town Centre First" principle, adopted by the Welsh Government, prioritising the health and vibrancy of town centres in decisions related to the location of new commercial, retail, education, health, leisure, and public service facilities.

Arts Development

- 4.1 Arts Development works closely with community groups on several levels. We devise projects that meet wellbeing needs of local people and use creativity to bring people together and collaborate on work that has meaning to their lives. For example, The Future Generation Commission recently held up our work in care homes as a model of good practice. We also give opportunities for people that want to be creative and have created several jobs through an apprentice scheme. These apprentices help fill the gap in provision through dance, drama, literature and music and assisted them become self employed practitioners. We advise and assist community groups, schools and individuals with project development, funding and collaboration that benefits people within the county. We partner with the health board and other creative agencies to have maximum impact.

Caerphilly Leisure and Wellbeing Hub

- 5.1 The council is building a new leisure and wellbeing hub in Caerphilly. The development is supported through a range of funding streams including the Levelling Up Fund, the Community Infrastructure Levy and Welsh Government.
- 5.2 The Caerphilly Leisure and Wellbeing Hub will be a new, financially sustainable and accessible facility for the people of Caerphilly county borough and beyond. The new facility will be a vital community asset that will act as a catalyst for improved health and wellbeing, enhanced community resilience and ultimately improved living standards and increased life expectancy. It will replace the ageing Caerphilly Leisure Centre and will offer:
- A six-lane community swimming pool with pool pod access, learner pool, leisure pool with flumes and interactive water features.
 - Express wellness spa including spa pool and heat treatments.

- Children’s adventure soft play integrated with sensory components.
- Tag Active Arena
- 4 court multi – purpose sports hall.
- 2 squash courts.
- 110-station fitness suite.
- Multi-purpose community room (for multi-agency working, community events, children’s parties etc.).
- Future studio/group exercise studio, cycling studio, Innerva suite and consultation rooms.
- Village changing rooms,
- Café providing community space.

Local Delivery Group

- 5.1 The Caerphilly Local Delivery Group (LDG) was created as part of the establishment of the Gwent PSB. The Gwent PSB recognised that, while there were issues that should be addressed at a regional level, there would also be those that would be best dealt with at a local level. As a result, the LDGs, one in each of the local authority areas were set up, with membership that reflected that of the Gwent PSB but at a more local level.
- 5.2 The Caerphilly LDG held a workshop in the summer of 2023 to consider the priorities in the Gwent Well-being Plan and what additional local activity could provide. The session was attended by public bodies, third sector organisation, community councils and interested individuals. The information from this session, the wider consultation that had taken place around the draft Well-being Plan, and further conversations with partners the LDG agreed to work on the following areas:
- Decarbonisation
 - Employability
 - Town Centres
 - Housing
- Action plans have been developed in three of the four areas, with the fourth under development. The LDG receives regular updates on progress, with partners suggesting further links, activities and opportunities. The most recent success has been the adoption of the Caerphilly Net Zero 2050 Strategy.
- 5.3 The Caerphilly LDG Net Zero 2050 Strategy is a collaborative response to the climate emergency, crafted to fulfil the Well-being of Future Generations (Wales) Act’s legislative purpose: improving the social, economic, environmental, and cultural well-being of Wales. It does so by embedding the Act’s five ways of working—long-term thinking, prevention, integration, collaboration, and involvement—into every aspect of its design. The strategy’s cross-cutting themes, such as digital innovation, education, and finance, are not treated in isolation but woven through each chapter, ensuring integrated, future-proofed decision-making. Digital innovation and education were in particular chosen, because although they are not reporting streams used in Carbon Budget 2, it was vital to ensure that the next generation, and the methods by which their information is received, was at the forefront of this Strategy. Its long-term vision is underpinned by measurable indicators and annual progress reviews, reflecting a commitment to prevention and accountability. At every stage of the project, listening, and listening to those who listen, was paramount.

- 5.4 Each thematic chapter—ranging from energy and transport to land use and organisational behaviour—demonstrates how the strategy supports the Act’s seven well-being goals. For example, the “Spaces We Live and Work In” chapter promotes energy-efficient, and better insulated housing and retrofitting, directly contributing to a resilient and healthier Wales. The “Ways We Move” section champions active travel and low-emission transport, aligning with a globally responsible Wales and reducing inequalities in access to mobility, and ensuring Wales is healthier in our travel choices. Meanwhile, the strategy’s emphasis on green skills and workforce transition, and the importance of the financial bottom-line that our businesses need to consider in “The Organisations We Work In” supports a prosperous Wales, ensuring that economic transformation is inclusive and just.
- 5.5 What sets this strategy apart is its deep, co-productive engagement and genuine partnership ethos. Developed through two-hour focus groups and one-hour semi-structured interviews, the strategy draws on rich, qualitative data from a diverse and high-calibre group of consultees—including senior public sector leaders, Welsh speakers, elected members, educators, business owners, community organisers, and young people. This engagement ensured that the strategy reflects both strategic insight and lived experience. Moreover, the document itself is a collaborative product of multiple public sector bodies within the Gwent Public Services Board, including local authorities, health boards, emergency services, and Natural Resources Wales. These partners are not only co-authors but also exemplars, showcasing best practices and shared accountability throughout the strategy. This collective ownership ensures that the strategy is not just a climate plan, but a shared well-being mission for Caerphilly’s future generations. The Strategy aims to be an engaged, and engaging piece, demonstrating the listening throughout with quotes from residents and businesses. It aims to invite Public Sector decision-makers to be the change they want to see.

Senedd Cymru | Welsh Parliament

[Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol](#) | [Equality and Social Justice Committee](#)

Ymateb gan: Maint Cymru | Evidence from: Size of Wales

Consultation response Size of Wales

Well-being of Future Generations (Wales) Act 2015: Post-legislative scrutiny

Size of Wales is a Welsh climate change charity that helps protect tropical forests and inspires climate action here in Wales. Our response to this consultation has focussed on the global responsibility goal of the Act, given that that is our area of expertise.

1. How far the intended objective of the Act is being achieved;

The Act has promoted longer term thinking and an integral approach to tackling structural issues. The Act reflects the long-term thinking of Indigenous Peoples who also promote an inextricable relationship and responsibility as an interdependent part of nature.

Progress made:

(i) Increased Awareness & Integration

- The Act has helped public bodies recognise global interdependence—especially regarding climate change, fair trade, and global inequality. Local authorities and the Welsh Government increasingly refer to global responsibility in strategies (e.g., Climate Action Plans, international solidarity efforts).

(ii) Ethical Procurement

- Some councils and public bodies have adopted ethical and sustainable procurement practices, including support for Fair Trade Wales and ethical sourcing policies.
- The Act enables Public Bodies to be bold and implement innovative actions to tackle systematic challenges. For example, Monmouthshire County Council voted to become the first Deforestation Free Champion Council in Wales (and possibly

the world!).

(iii) Global Citizenship Education

- Organisations such as Size of Wales, WCIA and Dolen Cymru have promoted global citizenship in schools, with increasing emphasis post-Act.
- Education reforms include a curriculum for Wales that embeds sustainability and global citizenship.

(iv) Collaboration

- The five ways of working of the Act increases collaboration between different actors.

(iv) Global leaders

- It has positioned Wales as a global leader in sustainability governance, drawing international interest and partnerships, boosting soft power and reputation.

Challenges

Lack of Clarity and Metrics

- The definition of “Globally Responsible Wales” remains vague and hard to measure. It is hard to quantify the benefits due to a lack of robust, long-term impact data—especially for cross-cutting goals like “Globally Responsible Wales.”
- Current national indicators focus mainly on domestic outcomes (e.g., emissions), not the global footprint (e.g., imported goods, supply chains).
- Not seeing a fundamental shift in the ways public bodies and the Welsh Government are working to deliver the Act. There is an implementation gap between the goals and indicators of the Act and action on the ground.
- Some public bodies struggle with applying the Act meaningfully. If the Act is seen as a “tick-box” exercise, it doesn’t generate real returns.
- There is a weakness within the Government of cross departmental / thematic thinking to put into practice the ways of working and seven wellbeing goals.
- There are some goals that have made more progress than others. The Global Responsibility goal is one of least understood and least actioned goals, given its breath and broadness.
- Auditor General reports have flagged inconsistency in how well different sectors apply future-thinking.

Weak Accountability

- Without clear sanctions for non-compliance, public bodies may underperform without consequence.

Limited International Impact Assessment

- Public bodies rarely assess how their policies affect global communities (e.g., climate justice, trade relationships, development aid).
- Wales still contributes significantly to global ecological degradation through consumption patterns (e.g., imported deforestation, outsourced emissions). See the JNCC report commissioned by the Welsh Government.
<https://data.jncc.gov.uk/data/dc81dd16-9b1c-4eeb-b350-dcadd5ade736/jncc-report-743.pdf>

Insufficient Structural Power

- The Future Generations Commissioner lacks binding powers to enforce globally responsible practices.
- Some public bodies treat the global goal as less urgent than domestic goals like health or economic resilience.

Overreliance on Soft Power

- Most progress is voluntary or symbolic, not embedded through law or budgeting.
- No mandatory requirements exist for public bodies to align spending with international ethical standards.

One practical example is the theme of global deforestation.

- 73% of all tropical deforestation is linked to just five agricultural products: beef, soy, palm oil, coffee, and cacao.
- To provide Wales' annual imports of key commodities like cocoa, palm oil, beef, soy, and timber, we require a land area in the tropics equivalent to 40% the size of Wales. 30% of these imports come from countries rated as high or very high-risk for deforestation, ecosystem destruction, and human rights violations - including child labour and the abuse of Indigenous Peoples' rights.
- 78% of soy imported into Wales is used as feed for livestock, along with 50% of our palm imports.
- The greenhouse gas emissions from just four of these commodities - soy, palm oil, cacao, and rubber - are equivalent to 22% of Wales' total transport emissions.
- If everyone on Earth lived like the average person in Wales, we would need 2.08 planets to sustain our lifestyle.

As part of the globally responsible goal, Wales should be ensuring that our supply chains are fair, ethical and sustainable. Size of Wales have been working with pupils from over 30 schools in Wales to become Deforestation Free Champion schools and they have carried out audits of their school menus to check whether there are ingredients on their school menus that might be contributing to tropical deforestation overseas. Their audits have found that schools and councils are serving non fairtrade products, including ingredients with palm oil in including ultra processed food, serving

meat and dairy fed on soy feed, and meat including corned beef that has been imported from high-risk countries such as Brazil.

Public procurement in Wales should be adopting deforestation free procurement principles that are globally responsible. Global justice, climate equity, and ethical sourcing need much stronger focus.

In short, while the Act has *inspired a cultural shift* and placed Wales on the map as a sustainability leader, the Globally Responsible Wales goal is only partially achieved, with major gaps in impact measurement, supply chain ethics, and international accountability.

2. Any action which should be taken to improve the effectiveness of the Act and its implementation, including any specific drafting issues;

We have the following recommendations:

Ethical Procurement and Supply Chains

- Require public bodies to adopt ethical sourcing, fair trade, and deforestation free standards.

Global Education and Solidarity Programmes

- Increase funding and visibility of global citizenship education in schools and communities.
- Strengthen partnerships with Global South countries through such as Wales and Africa.

Climate and Ecological Justice

- Accelerate decarbonisation efforts with a just transition model that supports affected workers.
- Create carbon accountability for Wales's global ecological footprint, not just domestic emissions.

Governance and Institutional Reform

- Bolster the powers of the Future Generations Commissioner, including budget oversight and veto powers. Equip the Commissioner with stronger powers to challenge poor performance
- Create a Parliamentary Committee for Future Generations to scrutinise legislation from a long-term perspective.

- There needs to be greater alignment between the goals, objectives and National Indicators of the Act with Public Bodies implementation plans. There seems to be a disconnect between high level indicators and on the ground implementation.

Strengthen capacity

- Investment in capacity of public bodies (PBs) to implement the wellbeing goals, given the cuts in public funding.
- More support provided to PBs to have a better understanding of how to implement the globally responsible goal and sharing of best practice from within Wales and with other nations / countries that are promoting innovative work.
- Greater involvement of third sector organisations and the public especially young people to be involved in implementing the Act and ensuring accountability.
- For example, we are not aware of how the Welsh Government plans to ensure that the “Emissions of greenhouse gases attributed to the consumption of global goods and services in Wales” is reduced. Despite commissioning the [JNCC report](#) on Wales’ global ecological footprint and Welsh consumption, there are no recommendations or action plans included in the report or targets to reduce this footprint. There also needs to be links to the National Indicators and PBs plans.
- Introduce auditable standards for reporting (KPIs, benchmarking)
- Make funding or recognition contingent on compliance

3. Would you like help drafting a compliance improvement framework or a report quality checklist for public bodies under the Act?

4. Whether the review and reporting requirements under the Act are being met;

The review and reporting requirements under the Well-being of Future Generations (Wales) Act 2015 are partially being met, but there are concerns around their consistency, depth, and impact across public bodies.

(i) The Future Trends Reports (2017, 2021) have been published.

- However, the report could be used more in policymaking and integrated into budgeting or programme implementation.

(ii) Public Bodies reporting

- Partially met. Most public bodies do report annually, but the quality and depth vary widely. Some reports lack clear metrics or fail to demonstrate impact or progress.

(iii) Public Services Boards (PSBs)

- Met on paper, but the Well-being Assessments and Plans are often vague or overly broad.
- Annual reports tend to be descriptive rather than evaluative—highlighting activities rather than outcomes.

5. How far the Act has represented, and will continue to represent, value for money.

To implement the Act, funding is required to run the Office of the Future Generations Commissioner for Wales, train public bodies on how to implement the act in practice and adjust policies etc. These costs represent value for money for the impact achieved.

The Act can also enable long-term cost avoidance. It encourages preventive action, especially in health, climate change, and education. These help avoid future crisis costs. E.g., policies promoting active travel and healthy lifestyles help reduce long-term NHS burden. Sometimes the Act promotes integrated working among public services, which reduces duplication and siloed spending.

Compared to traditional government spending, which often targets short-term outputs, the Act promotes systemic, long-term change. While returns may take decades, they are:

- Preventive, rather than reactive
- Societally broad, not limited to specific sectors
- Intergenerational, potentially benefitting future Welsh generations beyond current budget cycles.

6. How far the Act has been legally binding and enforceable; and

The *Well-being of Future Generations (Wales) Act 2015* is legally binding in principle, but not strongly enforceable in practice. While it places statutory duties on public bodies, the lack of hard enforcement mechanisms—such as legal penalties or judicial oversight—has significantly limited its power.

- It lacks legal teeth.
- Courts have limited precedent to enforce compliance under the Act.
- No successful legal action has yet forced compliance.
- The Commissioner has no enforcement powers. They may offer guidance, reviews, and make recommendations—but cannot compel action.
- Public bodies can legally ignore advice without consequence.



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Senedd Cymru | Welsh Parliament

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol | Equality and Social Justice Committee

Ymateb gan: Ymddiriedolaeth GIG Gwasanaethau Ambiwylans Cymru|

Evidence from: Welsh Ambulance Services NHS Trust

Equalities and Social Justice Committee

Post-legislative Review of the Wellbeing of Future Generations Act 2015

Evidence Submission: Welsh Ambulance Services University NHS Trust

Introduction

1. The Welsh Ambulance Services University NHS Trust (WAST) welcomes the opportunity to provide evidence to the Senedd's Equalities and Social Justice Committee in respect of its post-legislative review of the Wellbeing of Future Generations Act 2015.
2. As Committee will know, WAST was one of eight new organisations to come under the auspices of the Act on June 30, 2024 and, as such, it is early on in the Trust's WBFGA journey.
3. That said, the Trust has committed through successive iterations of its Integrated Medium Term Plan (IMTP), NHS Wales organisations' key planning documents, to work within the spirit of the Act.
4. Given this relative newness to the statutory requirements of the Act, this short evidence submission outlines some observations in respect of Committee's specific areas of inquiry, notably:
 - how far the intended objective of the Act is being achieved;
 - any action which should be taken to improve the effectiveness of the Act and its implementation, including any specific drafting issues;
 - whether the review and reporting requirements under the Act are being met;
 - the effectiveness of guidance made under the Act;
 - how far the Act has been legally binding and enforceable; and
 - how far the Act has represented, and will continue to represent, value for money.
5. However, it should be noted that, given that it is less than 12 months since the Trust has been formally subject to the Act, and that membership of public service boards (PSBs) has not been conferred on the Trust as a result (WAST is a member of the Vale of Glamorgan PSB as a result of long standing relationships), these observations are informed by WAST's experience of the partnership landscape more generally and its experience of collaboration.
6. In the interests of clarity, observations will be offered under the headings relevant to Committee's specific areas of interest.

How Far the Intended Objective of the Act is Being Achieved

7. The intended objective of the Wellbeing of Future Generations Act in ensuring that the Wales of today, tomorrow and the future is one where its people can thrive is one with which it is difficult to dispute.
8. With its focus on the seven wellbeing goals and the need for public bodies to collaborate to achieve them, the Act was a progressive piece of legislation, the tenets of which are founded in progressive policy-making and a recognition of the challenges faced in post-industrial Wales. On that basis, there is little to criticise in the legislation itself.
9. However, a decade later and the impact of a marginalised economy outside the European Union trading bloc, a pandemic which has had both health, economic and societal ramifications for the Welsh population and a shift in the regard in which public bodies are held, it is clear that, despite the legislation, public bodies have an uphill battle to manage their immediate challenges.
10. These challenges make for a particularly complex partnership landscape, where competing priorities and immediate challenges can often trump longer term thinking and action, despite the very best of intentions.

Partnership Landscape: Observations and Challenges

11. It is important at the outset to state that WAST coming under the auspices of the WBFGA has not resulted in membership of the 19 public service boards in Wales, one of the main collaborative vehicles to support delivery of the Act.
12. However, the Trust has been a long-standing of the Vale of Glamorgan Public Service Board, a function of individual relationships developed over many years and is also now a member of the seven Regional Partnership Boards (linked to the Social Services and Wellbeing (Wales) Act 2014) in Wales.
13. The Trust also has well developed relationships with the other emergency services in Wales and, as a service commissioned by the seven health boards in Wales through the NHS Wales Joint Commissioning Committee, has a strong commitment to collaboration and partnership.
14. The observations outlined below are, therefore, borne of those experiences and of the many other touchpoints the Trust has with organisations across the Welsh public service, third sector and beyond.
15. One of the main tenets of the Wellbeing of Future Generations Act, and outlined in its five ways of working, is collaboration. Collaboration can be a driver in ensuring public funding is optimised in a way that enables bolder decision-making to safeguard future generations and realise the aim of long term thinking informing short and medium-term actions.
16. What is clear in the partnership and collaboration sphere is that organisations are well-intentioned and committed to change and to working together. The challenge becomes

delivering on this in a meaningful way when funding and, importantly, governance mechanisms and performance management frameworks are different.

The partnership landscape in Wales is complex and rather cluttered. A total of 10 NHS organisations (seven health boards, three trusts), 22 local authorities and a number of Welsh Ambulance Services NHS Trust

17. Partners come together, among other mechanisms, through Public Service Boards (19) and Regional Partnership Boards (7), with the latter being the conduit currently for the Regional Integration Fund (RIF), which is due to cease in 2027.
18. In an environment where public sector funding remains, and is likely to remain, constrained, while societal demands and expectations grow, and many needs are immediate, the concept of long-term thinking and collaboration is one which is often difficult for public sector bodies to harness effectively. Couple this with short-term funding cycles, and it becomes difficult to see beyond 12-36 months out in terms of decision-making. This, in itself, often militates against the long termism which is at the heart of the Act.
19. There are a number of facets of partnership and collaborative working between agencies which are often problematic. When finances are constrained and under significant pressure, and the very time when collaboration should be a key part of service development and delivery, organisations often retrench and become more inwardly focused.
20. Collaboration requires not only shared purpose or goal, it often requires the ceding of control of resources, financial, physical or human. This is often deemed as a higher risk strategy at times of financial constraint. To collaborate effectively, there has to be a strong trust-based relationship between partners, and this takes time to develop. Often it is predicated on individual, rather than organisational relationships, and this in itself can result in unintended fractures or stalling of progress when those individuals move on.
21. Similarly, there is often over-reliance on discrete, non-core funding “pots”, for example the Regional Integrated Fund (RIF), and its predecessor the Integrated Care Fund (ICF), administered through regional partnership boards, to support collaborative and more integrated models of care between statutory partners. The RIF

Any Action Which Should be Taken to Improve the Effectiveness of the Act and its Implementation, Including any Specific Drafting Issues

22. While the substance of the Act already requires subject bodies to work collaboratively towards long-term objectives, there may be an option to enable enhanced collaboration through shared performance management frameworks.
23. Two recent reports from the Future Generations Commissioner and Audit Wales highlight well both the challenges and opportunities ahead, and also reference the relatively cluttered partnership landscape across Wales. Very different governance

structures across health, social care, local government and other public bodies mean that partnership-based decision-making is difficult. A shared performance management framework from Welsh Government, against which bodies subject to the Act were actively measured in terms of their collaboration goals, would perhaps focus more attention on the shared needs of the population, rather than the funding source for initiatives.

24. Similarly, more training on tools to enhance collaboration for Boards/Cabinets and senior leaders, for example the potential for section 33 agreements (formal partnership arrangements between NHS bodies and local authorities, primarily enabled by regulations under the National Health Service (Wales) Act 2006) to enable greater collaborative working, could reduce some of the anxiety associated with shared decision-making, accountability and financial flows.

Whether the Review and Reporting Requirements Under the Act are Being Met

25. It is difficult for the Welsh Ambulance Service to comment on this aspect, as 2025/26 will be the first year where it will be subject to reporting requirements under the Act. The organisation remains committed to complying with its obligations in this regard.

The Effectiveness of Guidance Made under the Act

26. In terms of the Welsh Ambulance Services University NHS Trust as a new organisation to come under the auspices of the Act less than a year ago, the most recent 2024 guidance has been helpful.
27. What is clear is that in the decade the Act has been in place, genuine progress remains challenging, for all the reasons outlined earlier in this submission. The question now becomes whether guidance translates into mandated action, or whether this would simply be a step too far, given the range of targets to which public bodies in Wales are already subject.

How Far the Act Has Been Legally Binding and Enforceable

28. In line with points previously made in this submission, while it remains difficult to dispute the logic and ambition of the Act, it was developed at a time of greater stability and without the social, economic and health shocks which have been experienced since.
29. These matters do not negate the validity of the Act, nor do they mean that the Act should be repealed. However, what is clear that is difficult to exert pressure on public bodies to comply with the Act when they face a multiplicity of immediate challenges which consume the majority of their activity.

How Far the Act has Represented, and Will Continue to Represent, Value for Money

30. Given that there are no funding streams for public bodies associated with the Act, and

that funding for the Future Generations Commissioner and his team is relatively limited in the scope of Welsh Government budgets, costs of implementing the Act are modest. As a Trust, no members of staff are employed specifically to implement the Act, and this is likely to be similar across public bodies. Arguably, this is both a strength and a weakness, as capacity to deliver is often cited as a constraint.

31. The Act is a unique piece of legislation that has been widely admired globally. It has intrinsic social value, which is difficult to evaluate on a value for money basis.

Welsh Ambulance Service: WBFGA Journey

32. The Welsh Ambulance Service has recently published its wellbeing objectives, which can be found [here](#). This year, the Trust will focus on embedding these objectives as a frame of reference for its decision-making. The Trust Board is committed to this process, and it will be important to remain focused when short-term exigencies can often trump longer-term goals.
33. The Trust's long-term horizon is already reflected in the organisation's move towards an updated model of clinical service delivery, designed to ensure that it is fit for the long-term, meets the needs of the people of Wales and is delivered collaboratively with the wider NHS Wales system and other partners. Similarly, the Trust will be looking at its approach to adaptation planning, examining how, as a statutory body under the WBFGA, it responds to known challenges, e.g. climate change. The Trust will be evaluating its current position against a maturity matrix to understand better the work it will need to do to work fully in the spirit of, and compliance with, the Act.

Closing Remarks

34. It is hoped that this evidence submission is helpful to Committee and the Trust looks forward to receiving the outcome of Committee's review in due course.

Ends/EVH/June25

Senedd Cymru | Welsh Parliament

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol | Equality and Social Justice Committee

Ymateb gan: Rewilding Britain | Evidence from: Rewilding Britain

Welsh Government Evidence Submission - Equality and Social justice Committee

Post-Legislative Scrutiny of the Well-being of Future Generations (Wales) Act 2015

Submitted by: Rewilding Britain

June 2025

About Rewilding Britain

Rewilding Britain is a registered Charity, working across the 3 nation's, to help create a wilder Britain for nature, climate and people. We're inspiring a movement of rewilders across Britain's land and seas - a groundswell of hope, so that together we can ensure a wilder, nature-rich future that benefits us all. Rewilding in Wales will be shaped by the country's unique legislative, cultural and ecological context.

Our response focuses on the effectiveness of the Act in delivering environmental sustainability and ecosystem resilience (Goals 2 and 7), and how it can better support nature restoration, including rewilding, which is the restoration of natural-process to ensure ecosystems function and flourish at scale, as a key part of future well-being in Wales.

1. To what extent is the Act delivering its intended outcomes?

We welcome and fully support the ambition and intent of the Well-being of Future Generations (Wales) Act, and acknowledge that it has helped raise the profile of sustainability within public sector decision-making. However, its delivery on environmental outcomes—particularly the goal of a *Resilient Wales*—has been limited.

Wales remains one of the most nature-depleted countries in the world and recent analysis on the amount of land currently in good condition for nature, by Wales Environment Link members, suggests that there is less than 3% of land and the sea that could count towards the Global Biodiversity Framework Target of 30% of land managed for nature by 2030. Despite a declared nature emergency, one in six species is at risk of extinction. While there have been some positive local initiatives, including rewilding projects, overall biodiversity trends continue to decline.

rewildingbritain.org.uk

 @RewildingB

Rewilding Britain is a charity registered in England and Wales (Charity no. 1159373), and Scotland (Charity no. SC045685) Registered office: The Courtyard, Shoreham Road, Upper Beeding, Steyning, West Sussex BN44 3TN

Key issues include:

- **Lack of statutory targets for nature recovery** – in contrast to climate targets, this leads to nature being deprioritised by public bodies. Nature must be given equal status to climate. They are equal and opposite and inextricably interlinked.
- **Limited impact of the Act on nature-based investment** – only 7.4% of the Welsh Government budget positively affects nature, while 50.4% is assessed as having a negative impact (Future Generations Report 2025).
- **Under-resourcing of ecological expertise** – cuts in local authority budgets have led to the loss of key staff needed to deliver on nature recovery ambitions, particularly ecologists. Uncertain and variable, short-term, funding for the delivery of Local Nature Recovery Action Plans make staff retention difficult, stifling effective delivery.

2. What changes are needed to strengthen the Act’s delivery for nature?

We recommend the following reforms and actions to enable the Act to more effectively deliver nature recovery and support rewilding as part of a joined-up approach to well-being:

a. Introduce targets for nature recovery and ecosystem health

To match the urgency of the climate crisis, we need statutory nature targets that enable public bodies to prioritise ecosystem restoration alongside decarbonisation. This can be delivered through a strong Environmental Governance, Principles and Biodiversity Targets Bill. However, the Commissioner needs to be able to be empowered to request reporting and compliance on these targets to assist the Welsh Government in delivery. Targets should include metrics for ecological condition, connectivity, and natural regeneration, aligning with Wales’s international biodiversity commitments.

b. Ringfence budgets for preventative environmental action, including rewilding

Rewilding, along with other nature recovery measures, is a proven preventative approach—reducing flood risk, enhancing carbon storage, and supporting mental and physical health. Dedicated, multi-year funding for nature-based solutions must be embedded in Welsh Government budgets to meet the intent of the Act. The current lack of investment (budgetary analysis suggests just 2% of the flooding and coastal erosion protection budget is spent on nature-based solutions) undermines progress on multiple well-being goals.

c. Strengthen the enforcement powers of the Future Generations Commissioner

The Commissioner plays a vital role in shaping sustainable policy, but currently lacks statutory enforcement powers. Given that only 68% of Public Services Boards have well-being actions/steps relating to nature (Future Generations Commissioners 10 year

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Report), stronger powers are needed to hold public bodies accountable for action on biodiversity and ecosystem restoration.

d. Resource and reform public partnerships to enable nature recovery at scale

Public Services Boards and place-based partnerships have a critical role in driving integrated, landscape-scale recovery. But without consistent, reliable and dedicated funding or staff capacity, delivery is limited. Natural Resources Wales, for example, cannot support all PSBs meaningfully with their current level of resources. A systems approach must be properly funded and resourced to deliver effective change and measurable actions on the ground. Without resources for delivery this is a paper only process.

e. Strengthen guidance and training on the Five Ways of Working for ecosystem restoration

The Five Ways of Working are essential but unevenly applied—particularly in relation to nature. Nature recovery projects often demonstrate how long-term, participatory approaches can transform degraded landscapes. And the IUCN Rewilding Principles embed community participation into rewilding approaches. These principles could be used to help guide landscape scale recovery. Public bodies need specific, practical guidance and training on embedding nature recovery into their well-being objectives and delivery plans, including high quality community involvement and co-design. Resourcing needs to meet the time and input requirements that these approaches require.

3. Is current guidance under the Act sufficient?

Current Welsh Government guidance focuses largely on compliance rather than delivery. More detailed advice is urgently needed on:

- Balancing short-term service pressures with long-term environmental goals;
- Managing trade-offs between well-being objectives;
- Embedding natural capital and ecosystem health into all major investment and infrastructure decisions.

The Future Generations Commissioner offers valuable support, but the scale of the challenge demands stronger, more strategic guidance from the Welsh Government across departments. Unless the Commission is granted stronger powers and the legislation is strengthened so it is more legally binding.

4. Is the Act enforceable and good value for money?

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While the Act has helped embed sustainability language and culture, it remains limited in legal enforceability. Environmental progress still relies on other legislation (e.g. Environment (Wales) Act 2016). To deliver true value, the Act must evolve to drive tangible environmental outcomes—not only procedural compliance.

The Office of the Future Generations Commissioner provides strong value for money and is one of the few bodies consistently advocating for environmental action. We support further investment in the Commissioner's role, alongside legal and budgetary mechanisms to enforce compliance.

5. Conclusion

The Well-being of Future Generations Act remains a bold and necessary piece of legislation. However, to meet the scale of the nature and climate emergencies, it must now evolve. Rewilding—restoring ecosystems through natural processes—offers a practical and visionary approach to delivering resilience in our landscapes, communities and rural economy alongside community well-being.

We urge Welsh Government to:

- Embed rewilding approaches, guided by the IUCN rewilding principles, and large-scale nature recovery in future well-being strategies;
- Provide public bodies with the resources, targets, and guidance needed to act;
- Ensure accountability for delivery on environmental and nature focussed outcomes across all Goals.

With these improvements, the Act can help deliver the thriving, resilient future it promises—not only for future generations, but for the natural systems on which all life depends.

Senedd Cymru | Welsh Parliament

[Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol](#) | [Equality and Social Justice Committee](#)

Ymateb gan: Gofal a Thrwsio Cymru | Evidence from: Care & Repair Cymru

Well-Being of Future Generations (Wales) Act 2015: Post-legislative Scrutiny

Care & Repair Cymru

Care & Repair improve homes to change lives. We help our clients to live independently in warm, safe, accessible homes by delivering housing adaptations and home improvements. We offer a holistic casework service including a whole house assessment taken from a national framework, including a falls risk assessment, welfare benefits check and home safety information and advice. In 2024-25 we delivered the following:

- 64,669 services delivered to help older people helped to stay independent at home.
- 24,933 Rapid Response Adaptations to prevent accidents at home.
- Completed 65,557 jobs in the home to a value of £21.9 million.
- Helped clients claim £12.5 million in unclaimed benefits.

Our clients are older people living in the owner-occupier and private rented sectors. Our average client age is 77, and four out of five clients tell us they are living with a disability.

Terms of Reference

The terms of reference for the inquiry are to consider:

- a. how far the intended objective of the Act is being achieved;**
- b. any action which should be taken to improve the effectiveness of the Act and its implementation, including any specific drafting issues;**

At Care & Repair we agree with the principles and intended objectives of the Act, particularly with regard to prioritising 'a healthier Wales' as one of the Act's well-being goals and the recognition of 'prevention' as one of the 'five ways of working' under the Act. We consider that Wales is rightly proud of the implementation of such a progressive Act. However, from our on-the-ground experience in thousands of older people's homes across Wales every year, we see

areas where implementation of the well-being goal, taking into account the ‘five ways of working’, could be strengthened on a practical level.

a) **How far the intended objective of the Act is being achieved:**

A Healthier Wales and prevention

We know that housing has a substantial impact on health; poor quality housing in Wales costs the NHS more than £95 million per year.ⁱ Care & Repair’s work ensuring that older people are living in safe, warm and accessible homes, and protecting housing stock for future generations, is a poor health prevention measure for both physical and mental well-being.

The Future Generations Report 2025’s analysis of the prioritisation of prevention in the ‘a healthier Wales’ well-being goal is damning, saying “*prevention budgets are being cut, and essential activities deprioritised. As a result, the NHS is increasingly overwhelmed with preventable diseases and accidents. This is an act of collective self-sabotage. We continue to treat the symptoms rather than addressing root causes.*”ⁱⁱ We would like to see more recognition of the impact of the wider determinants of health and specific focus on the impact of housing as a key determinant of health outcomes.

b) **any action which should be taken to improve the effectiveness of the Act and its implementation, including any specific drafting issues**

We would like to see increased prioritisation of ‘prevention’-based solutions and specific reference to housing as a prevention measure in the implementation of ‘A Healthier Wales’, in accompanying policy, and in public bodies’ well-being objectives. We also agree with the suggestion in the Future Generations Report 2025 that **Welsh Government and public bodies should ringfence prevention funding and increase prevention budgets each year** in order to prioritise the preventative and long-term approach needed for a sustainable system.ⁱⁱⁱ As stated in the Future Generations Report 2025, “*a lack of investment in prevention is already causing avoidable pain and hardship for many people across Wales. It is also costing the NHS and society as a whole.*”^{iv}

At Care & Repair we have extensive experience of delivering housing services in the homes of older people in Wales and are able to quantify the savings made to the Welsh NHS as a result of our interventions, as evidenced below:

Housing adaptations to help older people feel safe at home, prevent accidents, and reduce pressures on health and social care

The most recently published Welsh Government adaptation data shows that Care & Repair delivered 67% of all housing adaptations in Wales in 2020-2021.^v The delay in publishing this

data means there is a delay in capturing emerging pressures on our services, including demand and budgetary challenges. In 2020-21 we delivered 17,232 adaptations under the Rapid Response Adaptations Programme (RRAP) to help older people stay safe at home and prevent hospital admissions at a cost of £108 per RRAP. This is a 21% increase in demand and a 65% increase per unit cost compared to last financial year. RRAP is just one part of our service delivery; our overall demand is up 153% over this timeframe, and we continue to see year-on-year increases in the need of our service, all the while costs increase.

Care & Repair has benefited from consistent support from Welsh Government to deliver our Core and Rapid Response Adaptation (RRAP) services and we are grateful to have received confirmation in the Budget that this funding is due to increase. RRAP has been proven to reduce hospital admissions for fall by 17% amongst people aged 60-95.^{vi} This means that from our RRAP service **alone** in the first six months of 2024-2025, Care & Repair interventions have stopped over 1,700 older people from being admitted to hospital for a fall and have saved the Welsh NHS 20,600 bed days between April-September 2024, helping ease pressures on the NHS to the tune of £26 million last year alone. In addition, 91% of our clients told us that their independence and wellbeing had improved as a result of a Care & Repair intervention.

Housing support that prevents hospital readmissions – our Hospital to a Healthier Home service

Our Hospital to a Healthier Home service works to enable older people to return safely to their homes. We operate the service in 17 hospitals across Wales and work with hospital staff to identify older patients who have housing issues that may delay their return home. We work with patients and their families to carry out home improvements needed to enable quick and safe discharge. The service improves patient flow by speeding up safe hospital discharges, on average reducing length of stay by 6 days. Last year, the service saved 25,000 NHS bed days across Wales by supporting over 4,000 older people to leave hospital more quickly. The service reduces readmission rates by half. In addition, we offer longer term support beyond works essential for discharge to make sure that patients can return home to live safely and independently in the long term. 98% of clients said that our Hospital to a Healthier Home service helped them to return home and live independently.

Our experience delivering Hospital to a Healthier Home shows that the third sector is used to 'pick up' and 'problem solve' issues that neither the hospital nor Local Authority can, for example same day adaptations essential for hospital discharge such as key safes to allow a package of care to go ahead; furniture moving and/or plug socket installation for medical equipment. Hospital to a Healthier Home reduces a patient stay on average by 6-days and is proven to reduce readmission. *We would welcome support in reminding health boards and elected officials of the vital role the third sector plays in enabling safe hospital discharge and of*

the impact this service has on preventing readmission, in line with the 'a healthier Wales' wellbeing goal.

Housing that provides physical safety, free from hazards and hazardous disrepair.

Housing disrepair threatens lives and puts avoidable strain on health and social care services in Wales. At Care & Repair we see older people in Wales living in unfit and unsafe housing every day, with few opportunities for redress or to improve their situation. Isolation, the rising cost-of-living and a shortage of contractors has contributed to the deterioration and disrepair of many properties. The last Welsh Housing Conditions Survey published in 2018 showed that nearly 1 in 5 homes in Wales has a recorded Category 1 hazard, meaning the hazard is likely to harm the health of those living there. These official figures are out of date and do not truly reflect the state of housing in Wales. In February, the Welsh Government shared a statistical bulletin showing that 34% of homes assessed by local authorities in 2023-24 had a Category 1 hazard present, nearly double the official housing condition figures^{vii}.

This corroborates what we are seeing from our on the ground experience in over 50,000 homes across Wales each year. We are increasingly seeing complex cases where housing issues have gone unchecked and unresolved. Left unresolved, wear and tear can become hazardous disrepair and pose significant risks to the structure of the home and safety of the occupiers, requiring more intensive work to eradicate hazards.

There is a significant policy and funding gap for serious, urgent, emergency repairs for older people living in the owner-occupied sector who Care & Repair see daily, who cannot afford to get works done, and where there are no funding solutions available. This leaves older people living in poor housing with a major detrimental impact on their health, well-being, and ability to live independent lives: with increased risk of accidents, falls, and circulatory, respiratory and cardio-vascular diseases.

Ultimately, funding gaps for disrepair prevents the Act from achieving its 'a Healthier Wales' objectives for two key reasons:

1. Housing disrepair can make homes cold and damp:

Poor housing condition exacerbates respiratory problems and the risk of heart attacks and strokes. Cold and damp homes have been linked with increased hospital admission rates, and increased incidences of injuries such as falls. In addition, living in a poor environment and not having the means to improve this has a profound impact on mental health and quality of life, leaving older people feeling stressed and overwhelmed. Disrepair issues often result in poor energy efficiency of homes, causing higher energy bills which puts households at risk of fuel poverty.

2. Housing disrepair prevents independent living:

Disrepair must be addressed first to make a home fit for adaptation and to support independent living; a home with damp plaster walls cannot structurally support some handrails, or poor-quality electrics cannot safely power an electric stairlift.

For those who cannot afford to fund repairs themselves, our Caseworkers attempt to source resources from hardship funds, benevolent funds and trusts to finance works. Often this is extremely time-consuming, piecemeal and increasingly difficult as multiple organisations compete for dwindling pots of funding. This is an inefficient way of working.

We believe the Welsh Government should implement a Safety-Net Grant delivered by Care & Repair to rectify instances of hazardous disrepair, available to low-income owner-occupiers to tackle instances of hazardous disrepair in their homes where no other recourse is available. Care & Repair believes in efficient and effective use of resources. A safety-net grant for hazardous disrepair would provide **a long-term prevention-based and sustainable solution to complex interlinked issues**, including the following substantial benefits:

- Saving the Welsh NHS money:
 - Poor quality housing costs the NHS in Wales more than £95 million in treatment costs per year.^{viii} The annual treatment costs represent only 10% of the full economic societal costs of leaving people in unhealthy housing, estimated at £1 billion per year.^{ix}
 - Improving the poorest housing could lead to 39% fewer hospital admissions for circulation and lung issues^x. Improving housing conditions would result in 40-50% fewer respiratory illnesses in homes that are not damp.
- Reduce pressure on ambulance services - falls were the largest call to WAST in 2023, and 77% of falls related calls were from people aged 65+ resulting in 42,000 hospital admissions.^{xi}
- Dealing with housing issues quickly and efficiently before they become worse and more expensive to rectify.
- Equitable service across Wales.
- Efficiency and effectiveness of Care & Repair service delivery – enabling caseworkers to resolve all problems at the same time when in a client’s home, and not spend multiple hours of casework time trying to source a patchwork of benevolent funding where caseworkers could be supporting more people.
- Joined up policy - health prevention, quicker safe hospital discharges, reduced social care, better well-being outcomes.



- Aligns with the Future Generations Report 2025's recommendation to “*supercharge actions with multiple benefits*” and focus on win-wins in tough financial times.^{xii}
- Aligns with the Welsh Government's statutory obligations under the Act to set out its well-being objectives to achieve the well-being goals. The Welsh Government's current well-being objectives include to “*provide effective, high quality and sustainable healthcare*” without specific mention of the wider determinants of health. Implementing the Safety-Net Grant could be a way for the Welsh Government to extend its well-being obligations to include ‘prevention’ in the context of the ‘a Healthier Wales’ well-being goal in a sustainable way. The Safety-Net Grant would also align with the Welsh Government's well-being objective to “*protect, re-build and develop our services for vulnerable people*”.^{xiii}

We recommend that Welsh Government implements the Safety-Net Grant as an urgent priority.^{xiv}

Cold and damp homes

Working to ensure all households in Wales are protected from the damp and cold should be a key priority in the implementation of the Act's well-being goals. Care & Repair's Older Not Colder service helps older people in Wales to feel warm in their homes by supporting older people to keep their homes warm and energy bills down. The service has Home Energy Officers working across Wales who visit and access homes for free, offer expert advice and can help clients find funding if repairs or improvements are needed to keep a home warm. Our Older Not Colder service also improves clients wellbeing; as one of our Older Not Colder Home Energy Officers stated: “*Every day, I meet people who are really stressed because their home is painfully cold or because they can't afford their energy bills. Thankfully, through the Older Not Colder service, I can provide some peace of mind to those who need it this winter.*”^{xv}

Year on year we see an increase of homes in poor conditions, and more calls from clients about damp and mould. This also has health implications for our clients: over 75% of excess winter deaths in Wales are people aged 75 and over and 30% of excess winter death are attributed to living in cold homes.^{xvi} Older people living in a cold home have an increased risk of poor physical and mental health, loneliness, hospital admission and premature mortality.^{xvii} Excess cold can also increase incidence of injuries such as falls.

Our Older Not Colder service also provides support with accessing the Warm Homes Programme. This is the Welsh Government's “*primary mechanism of tackling fuel poverty*”.^{xviii} However, the current investment of £39 million per year is not sufficient to meet needs or targets. The tender document for the new Programme indicated that around 1600 homes would be upgraded annually over the duration of the scheme. Based on this figure, it would take over

a century to upgrade all of Wales' lower-income households currently estimated to be in fuel poverty (approximately 217,700).^{xix} Likewise, compared to the previous Nest scheme, we are proportionally under-accessing this due to challenges around the measures provided, such as air source heat pumps, being unsuitable for many of our older clients. If a client does not want or is ineligible for an air source heat pump, their case is being closed rather than receiving other support such as insulation to improve the thermal efficiency, and therefore affordability, of their home.

For our clients living off the gas grid or who use alternative fuel types such as oil or electric storage heaters, living at home is an even greater challenge. There is a lack of provision in schemes such as the Warm Homes Programme for households that do not have a gas boiler, and a large number of our clients are not connected to mains gas. For example, in Ceredigion approximately 68% of homes are off the gas network. We are pleased to see Welsh Government recently committing to expand the Warm Homes Programme to implement a non-gas boiler crisis route. Although there has been additional spotlight on fuel poverty in recent years, clearly these problems are increasing. We believe the focus should be to **increase funding to fuel poverty initiatives, specifically the Warm Homes Programme and expand the available support for homes using alternative fuel types**. UK Government's recent commitment to invest £13.2 billion into their Warm Homes Plan will allow for Welsh Government to ramp up investment into fixing cold and damp homes; **Barnett consequentials equating to around £660 million as a result of the Warm Homes Plan should be invested into the thermal comfort and energy efficiency for Welsh households**.

Future generations of older people in Wales and consideration of changing housing needs

Future generations in Wales will include an increased number of older people. Wales has an ageing population - nearly 1 in 4 people in Wales will be 65 or older by 2028. Implementation of the Act should also consider the suitability and adequacy of Welsh housing stock for the future generations of older people that are coming through and that such needs may change over time. Any consideration of the long-term change required to implement warm, safe, adequate housing must consider the needs of Wales' upcoming ageing population.

- c. whether the review and reporting requirements under the Act are being met;**
- d. how far the Act has been legally binding and enforceable;**
- e. how far the Act has represented, and will continue to represent, value for money.**

We do not consider that it is for us to comment on whether individual public bodies are meeting their review and reporting requirements under the Act. We consider that the

Future Generations Commissioner for Wales and Audit Wales may be best placed to address these points.

f. the effectiveness of guidance made under the Act;

We consider that this is best addressed by public bodies in terms of the guidance they receive to inform their compliance under the Act.

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- ⁱ *Making a Difference. Housing and Health: A Case for Investment Executive Summary*, Public Health Wales, 2019 - phw.nhs.wales/files/housing-and-health-reports/a-case-for-investment-executive-summary/
- ⁱⁱ Future Generations Commissioner for Wales *Future Generations Report 2025* - [Future-Generations-Report-2025.pdf](#)
- ⁱⁱⁱ Future Generations Commissioner for Wales *Future Generations Report 2025* - [Future-Generations-Report-2025.pdf](#)
- ^{iv} Future Generations Commissioner for Wales *Future Generations Report 2025* - [Future-Generations-Report-2025.pdf](#)
- ^v Welsh Government, *High-level analysis of data on housing adaptations 2020-21*, July 2024 - [Housing adaptations: analysis 2020 to 2021](#)
- ^{vi} Data quality and methodology: The analysis data set contained 655,671 people aged 60 – 95 who were registered with a Welsh general practice, of which 123,179 were Care & Repair clients (C&R), between 2009-2017. The project analysed the data cohort against data linked to incidence of falls, the Welsh Index for Multiple Deprivation (WIMD) and the Elderly Frailty Index (eFI); with quarterly observations pre and post C&R intervention. The eFI provided the basis for linking comparable data for C&R and Non-C&R clients.
Ref: [Do home adaptation interventions help to reduce emergency fall admissions? A national longitudinal data-linkage study of 657,536 older adults living in Wales \(UK\) between 2010 and 2017 | Age and Ageing | Oxford Academic \(oup.com\)](#)
DOI: <https://doi.org/10.1093/ageing/afab201>
- ^{vii} Welsh Government, Statistics, *Housing Hazards (2025)* Available at: [Housing hazards: April 2023 and March 2024 \[HTML\] | GOV.WALES](#)
- ^{viii} phw.nhs.wales/files/housing-and-health-reports/a-case-for-investment-report/
- ^{ix} [Poor housing costs health service £95m per year – new report - Public Health Wales \(nhs.wales\)](#)
- ^x [Poor housing costs health service £95m per year – new report - Public Health Wales \(nhs.wales\)](#)
- ^{xi} Wales Ambulance Service, Falls Training Presentation, 2024
- ^{xii} Future Generations Commissioner for Wales *Future Generations Report 2025* - [Future-Generations-Report-2025.pdf](#)
- ^{xiii} The Welsh Government's *Programme for government 2021 to 2026: Well-being statement*, 17 June 2021 - [Programme for government 2021 to 2026: Well-being statement \[HTML\] | GOV.WALES](#)
- ^{xiv} The call for a Safety-Net Grant is the main feature of Care & Repair Cymru's 2026 Senedd Election Manifesto which you can view here – [CRC-Manifesto-Senedd-Election-2026-FINAL-WEB-2.pdf](#)
- ^{xv} Care & Repair Cymru, Older Not Colder service - [Older Not Colder: Free Home Energy Support | Care & Repair](#)
- ^{xvi} [Care & Repair english WEB.pdf - Google Drive](#)
- ^{xvii} [PHW-Cold-homes-lit-review-28_11_22.pdf](#)
- ^{xviii} Welsh Government *New Warm Homes Programme: policy statement* - [New Warm Homes Programme: policy statement \[HTML\] | GOV.WALES](#)
- ^{xix} National Energy Action (NEA) Cymru response to the Equality and Social Justice Committee inquiry into fuel poverty in Wales - [ESJ-Fuel-Poverty-Inquiry-Response-NEA-Cymru.pdf](#)

Senedd Cymru

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol

Ymchwiliad: Deddf Llesiant Cenedlaethau'r Dyfodol (Cymru) 2015

Ymateb gan: TUC Cymru

-

Welsh Parliament

Equality and Social Justice Committee

Inquiry: Well-being of Future Generations (Wales) Act 2015

Evidence from: TUC Cymru



Well-being of Future Generations (Wales) Act 2015: Post-legislative scrutiny

Senedd Equality and Social Justice Committee

Deadline: 20 June 2025

About TUC Cymru

TUC Cymru is the voice of Wales at work.

We're creating a Wales where everyone has a voice through their union and an income they can build a life on. We believe that every worker has the right to be safe, valued and respected.

When workers act collectively, we have the power to create positive change in society. We bring workers together through 48 unions to fight for better jobs and a more equal and prosperous country.

1, Cathedral Road, Cardiff, CF11 9SD

www.tuc.org.uk/wales

To what extent are the Act's objectives being achieved?

Well-being economy

With regard to the Future Generations Act objective that Wales should become a well-being economy, TUC Cymru believes that there is more work to be done.

Rates of poverty in Wales remain high. According to a new report by the Bevan Foundation:

“Poverty in Wales is deeper, more persistent, and more entrenched than in the UK as a whole. After housing costs, 21% of the Welsh population lives in relative poverty¹. Although this is only slightly above the UK average of 20%, the disparity is particularly stark in the lives of children: 31% of children in Wales grow up in relative income poverty, compared to 29% across the UK¹.”

This might lead one to the conclusion that the Future Generation Commissioner's office has failed. However, it very important to note that public bodies, rather than the Commissioner are responsible for creating a well-being economy. Working with the UK Government, public bodies need to do more to attract, establish and maintain well-paid and secure employment in all parts of Wales – especially the post-industrial areas.

The revisions to the Future Generations Act made under the Social Partnership and Public Procurement (Wales) Act offer further encouragement to public bodies to create and sustain a well-being economy. The social partnership duty requires public bodies

¹ [The impact of policy interventions designed to reduce poverty in Wales - Bevan Foundation](#)

to seek consensus with trade unions when setting and delivering well-being objectives. It also requires them to report on these matters. By giving a greater voice to workers and unions in setting well-being objectives, improvements should be seen in the working conditions of workers in the devolved public sector and its suppliers.

There has been a positive start, with the first social partnership reports having been shared with the First Minister and the Social Partnership Council. These reports have set the benchmark for public bodies' engagement with unions on well-being objectives. It will be important to see year-on-year progress on this engagement – and an understanding of the benefits that social partnership brings in developing a well-being economy.

TUC Cymru welcomed an amendment to the Future Generations Act under the Social Partnership Act which changed the prosperous Wales goal so that it now refers to 'fair work', rather than 'decent work'. Now, public bodies are required to design objectives that contribute to fair work, which the Welsh Government defines as:

“work which means workers are fairly rewarded, heard and represented, secure and able to progress in a healthy, inclusive working environment where rights are respected.”

However, the Future Generations Commissioner and Audit Wales have no role in relation to promoting or monitoring compliance with the Social Partnership Act provisions which may result in a low rate of compliance. Therefore there is a case for a stronger role and greater resources for the Social Partnership Council so that it can monitor whether well-being objectives in relation to Fair Work and social partnership have been achieved by public bodies.

Involvement and collaboration

The promotion of social partnership in the revised Future Generations Act complements the five way of working, in particular the emphasis on involvement and collaboration. We warmly welcome trade union and employer involvement in the Welsh government's decision-making. We believe the involvement of social partners improves government decision-making and grants them greater credibility and support.

Some good examples of strong involvement and collaboration under the auspices of social partnership include recent co-operation in policy development between unions, Welsh government and public sector employers in relation to managing the opportunities and risks of AI in the workplace².

² <https://www.gov.wales/managing-technology-manages-people>

Widening list of public bodies

Trade unions would like the social partnership duty to extend through the entire devolved public sector and we would like to widen the list of public bodies the Future Generations Act covers, such as wholly owned companies, corporate joint committees and health and social care regional partnership boards.

Socially responsible procurement duty

We welcome the socially responsible procurement duty and the additional obligations in relation to major construction contracts and outsourcing services contracts and that the 'socially responsible procurement goals' are based on the well-being and fair work goals. Linking the socially responsible procurement goals to the fair work goal will be critical to delivering fair work outcomes from procurement spend, as will requiring the in-scope public bodies to set and publish objectives on how it will achieve the socially responsible procurement goals. We welcome the fact that – despite delays - new procurement regulations linked to the Social Partnership Act will soon be published.



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Senedd Cymru | Welsh Parliament

**Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol | Equality and Social
Justice Committee**

Ymateb gan: Comisiynydd y Gymraeg | Evidence from: Welsh Language
Commissioner

Comisiynydd y
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Welsh Language
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The Equality and Social Justice Committee

SeneddEquality@senedd.wales

19/06/2025

Dear Chair,

**Consultation: Well-being of Future Generations (Wales) Act 2015: Post-enactment
scrutiny**

The Welsh Language Commissioner was established by the Welsh Language (Wales) Measure 2011. The Bill enables the Welsh Language Commissioner to do anything appropriate in the Commissioner's opinion to promote and facilitate the use of the Welsh language and to work towards ensuring that the Welsh language is not treated less favourably than English. As a result of section 26 of the Well-being of Future Generations Act, the Welsh Language Commissioner is a member of the Advisory Board of the Future Generations Commissioner.

In line with our duty as Welsh Language Commissioner, our response will focus specifically on the extent to which the Well-being of Future Generations (Wales) Act 2015 (the Act) has led to progress in relation to the well-being goal of 'Wales with a vibrant culture where the Welsh language is thriving'.

In attempting to answer this question it is inevitable that the impact of the act needs to be considered within the context of the Welsh Language (Wales) Measure 2011. The Bill already imposes specific requirements on public bodies in Wales, and the Welsh Language Commissioner has regulatory responsibilities and powers to ensure that public bodies



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comply with their duties under the Welsh language standards regime.

There are now over 130 public organisations subject to Welsh language standards, which include all public bodies that fall under the welfare duty of the Future Generations Act. Welsh language standards impose broad duties on public bodies. These duties can be divided into five main areas:

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Croesewir gohebiaeth yn y Gymraeg a'r Saesneg

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Welsh Language Commissioner

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Caernarfon
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Correspondence welcomed in Welsh and English

welshlanguagecommissioner.wales

- **Service delivery** – this includes issues such as correspondence, answering the phone, meetings, publishing documents, maintaining websites and social media channels, signage etc.
- **Implementation** – this includes issues relating to the internal use of Welsh within organisations, recruitment, and language training for staff.
- **Record keeping** – this includes issues relating to complaints, and also an assessment of staff's language skills.
- **Policy making** – a number of public bodies have a duty to consider the impact of their policy decisions on the Welsh language and to consider how the policy could be adapted in order to have more positive impacts on the Welsh language.
- **Promotion** - local authorities and national parks have a duty to draw up 5-year promotion strategies which explain how they will actively promote the Welsh language and facilitate the wider use of the Welsh language in their areas.

As you know, one of the well-being aims of the Well-being of Future Generations Act is 'Wales with a vibrant culture where the Welsh language is thriving'. By including the Welsh language as one of the well-being goals there is a duty on public bodies named in the Act to set well-being objectives that will contribute to the achievement of the well-being goals of the Act. There is also a duty on public bodies to take all reasonable steps (in the exercise of their functions) to achieve those objectives. To all intents and purposes therefore, the Act imposes a duty on public bodies in Wales to act in ways that will ensure that the Welsh language thrives in the future. We welcome this.



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The extent to which the objectives of the Well-being of Future Generations Act are being achieved

As the two legislative regimes share many of the same general objectives from the point of view of the Welsh language, it is difficult to draw definite conclusions about the specific impact that the Well-being of Future Generations Act has had in terms of the Welsh language. It is difficult to isolate the impact of the Well-being of Future Generations Act from the impact of the Welsh language standards regime and also the work of a wide range of other partners who contribute to the Welsh Government's Welsh 2050 agenda. Despite this, there is no doubt that the Act and the work of the Future Generations Commissioner complement and support the work of the Welsh Language Commissioner. In this context we work closely and effectively, and take advantage of opportunities to collaborate in order to maximise achievement.

The overall findings of the Audit Wales report on the implementation of the Act¹ indicate that there is clear evidence that the Act influences the ways in which public bodies plan and operate. However, it also notes that the act to date has not prompted the intended system-wide change. The Future Generations Commissioner's Future Generations 2025 report² also concludes that significant work needs to be done to ensure that the principles of the Act are realised, and that the gap between policy and implementation is reduced.

In terms of the Welsh language in particular, the report of the Future Generations Commissioner states that there is a lack of strategic focus on culture and the Welsh language within the well-being objectives of public bodies and Public Service Boards. The report recommends that there needs to be a greater constant focus on culture and the Welsh language and that the Welsh language and culture really need to be a central part of the planning and implementation process at all levels in order to realise meaningful progress.

There is no doubt the Act contributes towards ensuring public bodies consider the Welsh language in planning processes and when making different decisions. Nonetheless, it is also often the case that Act and its language are accepted and discussed as a policy framework, but do not necessarily penetrate and have a real impact on the way policies are designed, funded and implemented. Consequently, the Welsh language is at times a marginal consideration in the process of planning and implementing different policies. There are too many examples of policy decisions and various strategies that have not adequately considered the Welsh language, and occasionally, this is likely to have a negative impact on people's opportunities to use the language. The reasons for this are likely to be a combination of a lack of understanding and coordination, a lack of resources and budgetary challenges, and the need for public bodies to prioritise short-term challenges rather than longer-term solutions.

In general, the findings of the Audit Wales report and the report of the Commissioner for Future Generations reflect our experience and evidence of the ways in which public bodies plan and operate from a Welsh language perspective. For example, one of the main conclusions of our report which provides an overview of compliance with Welsh language



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duties for 2023-24 was that there is clear ³ evidence that organisations are now better equipped to provide high quality Welsh language services. There is no doubt that the compliance of public institutions with Welsh language standards is improving and that people consequently have more opportunities to use the Welsh language.

Action to improve the effectiveness of the Well-being of Future Generations Act and its implementation

There are probably a range of issues that might be considered in order to improve the effectiveness of the Well-being of Future Generations Act. We know that the Future Generations Commissioner's evidence to the committee⁴'s inquiry outlines a vast number of options to improve the effectiveness of the act. Our response below will focus on one factor,

² [Adroddiad-Cenedlaethaur-Dyfodol-2025.pdf](#)

³ [Assurance Report 2023-24](#)

which is the potential that exists to strengthen the way we work in partnership in order to achieve the well-being goal of Wales with a vibrant culture where the Welsh language is thriving.

In April we published our Strategic Plan for 2025-30⁵. A prominent theme running through our new strategic plan is our desire to prioritise important strategic areas, and to act in a more proactive manner in order to have the greatest impact on opportunities to use the Welsh language. With regard to our work with public organisations, we state that the following areas will be a priority for us over the next five years:

- To increase the use of Welsh in workplaces
- To improve local authority and national parks' procedures for the preparation and evaluation 5-year promotion strategies
- To improve Welsh language services within the health and care sector, with a particular focus on working with NHS Health Boards and NHS Trusts to increase opportunities for people to receive clinical services in Welsh
- To increase opportunities for children and young people to use the Welsh language
- To promote the use of services

We consider that the requirements of the Well-being of Future Generations Act and the work of the Future Generations Commissioner have the potential to support the achievement of our strategic objectives. We are therefore very keen to continue working with the Future Generations Commissioner in order to drive meaningful progress in these areas.

Naturally, therefore, any steps taken to improve the effectiveness of the Well-being of Future Generations Act, or to improve the ability of the Future Generations Commissioner to influence public bodies would be warmly welcomed. In terms of the Welsh language in particular, we believe that the focus should be on how the act and the Commissioner can complement and add to our ongoing work, thereby leading to faster and more far-reaching

⁵ [Welsh Language Commissioner's Strategic Plan 2025-30](#)



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progress in the way public bodies plan and operate from a Welsh language perspective.

Yours sincerely,

Efa Gruffudd Jones
Welsh Language Commissioner



Senedd Cymru | Welsh Parliament

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol | Equality and Social Justice Committee

Ymateb gan: Climate Cymru | Evidence from: Climate Cymru

Consultation response- Well-being of Future Generations (Wales) Act 2015: Post-legislative scrutiny

About Climate Cymru and our vision for Wales

Climate Cymru is a dynamic and growing movement, uniting hundreds of organisations from every sector of Welsh society and thousands of individuals across the nation. We are brought together by the urgent recognition that the climate and nature emergencies demand immediate and fair action.

A core part of our approach is actively encouraging people to join in decision-making. This ensures we truly represent different viewpoints, making our work relevant to individuals and impactful for all Welsh communities. We know people have felt ignored by those in power for too long. To get real "buy-in" for local projects—like those on flooding, nature, tree planting, or changing our old industrial towns—we simply must listen to and act on what local people want and hope for.

Climate solutions aren't just about avoiding disaster; they can significantly improve everyone's quality of life and build a better future for Wales. These initiatives, combined with nature restoration, bring countless benefits that enhance well-being across the nation. We need to make this positive story a much bigger part of the conversation, showing that climate action directly helps people, rather than being a burden.

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Considering the constraints on our available time, we have compiled a set of observations and actionable suggestions on the crucial work currently being undertaken by your committee. We aim to provide insights that may further inform and enhance your ongoing effort. Often, there is consensus, but they do not always represent the views of every member organisation. Many of our partners have already provided you with evidence, and we do not wish to duplicate.

As a partner organisation, there are groups, many of whom are too small to engage in these processes, who are working daily, on the ground, to promote and amplify the vision outlined in the Future Generation Act. Should the committee wish to arrange visits, we can facilitate

this.

We believe that the Well-being of Future Generations Act is a ground-breaking piece of legislation globally, and has set Wales as a World leader as a result.

Our partners ground their work in the values of the Act, and seek to amend organisational practices to better reflect the wellbeing goals within it.

The actions we take collectively in our communities to improve the future of Wales are vital. It can determine how we shape our work, how it impacts the environment, and create an inclusive Wales where we all can thrive.

Nonetheless, while the Act's principles are commendable, its implementation often devolves into tick-box exercises or greenwashing, with well-being goals treated as silos rather than interconnected pillars essential for a prosperous, equal, and healthy Wales, leading organisations to focus on projects over systemic change.

Ideas to address these challenges:

1. Combatting tick-boxing and greenwashing:

- **Introduce a "substance over form" evaluation framework:** Develop clear, robust criteria for assessing how public bodies (and potentially private sector partners in public contracts) demonstrate genuine integration of the Act's principles, rather than just documenting isolated activities.
- **Expand the Future Generations Commissioner's remit to key private sector engagements:** While the Act primarily applies to public bodies, its spirit can be extended. Grant the FGC power to:
 - **Scrutinise large public contracts:** Enable the FGC to review major procurement processes and contracts for their alignment with future generations principles, particularly where private companies are delivering public services or significant infrastructure.
 - **Develop best practice guidance for private sector partners:** We do acknowledge the FGC office has a toolkit for business, but this should go further. They should issue specific, actionable guidance for private companies seeking to align with the Act when working with public bodies, highlighting areas of potential "greenwashing" and how to avoid them.
 - **Certifications/Accreditations:** Explore a voluntary certification or accreditation scheme for private sector entities demonstrating genuine commitment to the Act's principles, providing a market advantage for those truly integrating them.
- **Strengthen public transparency and accountability for compliance:**
 - **"Explain or justify" mechanism:** Require public bodies to explicitly justify (and have that justification publicly scrutinised) decisions that appear to contradict the Act's goals or ways of working.
 - **Citizen oversight and challenge fund:** Establish a fund or mechanism to support citizens and community groups in challenging instances of perceived tick-boxing or greenwashing by public bodies, potentially leading to FGC investigation or even legal recourse.

Breaking down Well-being goal silos:

- **Mandate "integrated well-being outcomes" and cross-goal indicators:** Shift the

focus from reporting on individual goals to demonstrating how *multiple* goals are being achieved simultaneously. Require public bodies to:

- **Define inter-connected objectives:** Explicitly state how their objectives for one goal contribute to or are dependent on others (e.g., how "Prosperous Wales" initiatives also contribute to "More Equal Wales" and "Healthier Wales")
- **Foster inter-goal collaboration hubs/forums:** Create formal or informal structures (e.g., cross-sector working groups, knowledge-sharing platforms) that specifically bring together leaders and practitioners from different "well-being goal" areas (e.g., economic development, health, environment) to co-create solutions that address multiple goals simultaneously.

A common criticism and aspiration from our partners are that it "lacks teeth" when it comes to enforcement.

To move the Future Generations Act to stronger enforcement, the following additional powers for the Future Generations Commissioner could be considered, inspired by the Older People's Commissioner for Wales-

1. **Power to compel information:** Grant the FGC the legal authority to *require* public bodies to provide data, reports, and evidence related to their compliance with the Act. Failure to comply could lead to formal sanctions.
2. **Binding recommendations (in certain circumstances):** Introduce a mechanism where, following a review and persistent non-compliance, the FGC's recommendations could become legally binding on public bodies. This would shift from "should" to "must."
3. **Power to directly challenge decisions:** Empower the FGC to initiate legal challenges or intervene in judicial reviews where a public body's decision is contrary to the principles and goals of the Act and no reasonable steps are being taken to address it. This would provide a direct route for accountability.
4. **Ability to impose financial penalties:** For sustained and egregious non-compliance, introduce a power for the FGC to levy financial penalties on public bodies, with the revenue potentially ring-fenced for future generations initiatives, decided upon by deliberative democracy processes in Welsh communities.
5. **Enhanced powers of investigation:** Provide the FGC with broader powers to investigate alleged breaches of the Act, including the ability to conduct site visits (excluding private dwellings)
6. **Direct support for citizens/groups to challenge:** Mirroring the OPCW, the FGC could offer more direct assistance (legal, financial, advisory) to community groups or individuals who wish to challenge public body decisions that they believe undermine the interests of future generations. This would decentralise enforcement and empower the public. It would also empower the Commission's office with more diverse, more direct ways to engage communities.

We look forward to engaging further with the committee on this work, and wish you well in your endeavours.

Submission of Evidence

by Annie Tubadji to the Equality and Social Justice Committee

This evidence is submitted by me, Annie Tubadji, a current resident of Wales and Senior Lecturer at Swansea University, to the Equality and Social Justice Committee in response to their latest inquiry. The inquiry addresses the following terms of reference:

- **how far** the intended objective of the Act is being achieved; any action which should be taken to improve the effectiveness of the Act and its implementation, including any specific drafting issues; whether the review and reporting requirements under the Act are being met;
- the **effectiveness** of guidance made under the Act;
- how far the Act has been **legally binding and enforceable**; and how far the Act has represented, and will continue to represent, **value for money**.

The evidence I am submitting here is based on research I conducted at Swansea University as part of the *Managing the Roadmap (MATHER)* Project, implemented through my ESRC funded role as an Investment in Places Policy Fellow of The Productivity Institute, Manchester. The MATHER Project explores how to provide consistent, quantitative evidence across Public Services Boards (PSBs) to complement the existing qualitative assessments of their performance since their inception (i.e. to complement their Annual Reports with quantitative evidence).

The rationale of the MATHER Project is that to evaluate what PSBs have achieved, we must map the WFGA's objectives as desired outcomes for the PSB projects and trace the PSBs' contributions toward these outcomes. This requires gathering of quantitative trace of what resources entered the PSB and for what type of projects (outputs) they were used. Then we can delve into establishing how effective and efficient this use of resources has been according to standard estimation of these aspects of the job done by the PSB.

Below it is clarified how each of the three points in the terms of reference are informed by my evidence contribution. Each terms of reference point is covered as a separate section marked with a roman number I, II and III respectively.

I.

To address the first term of reference—**how far the WFGA's objectives have been met and reported about**—the MATHER Project establishes a framework for measuring PSB performance and success. This framework serves quantifying the inputs used by PSBs **to assess the value-for-money outcomes** they deliver.

The MATHER Project provides this framework as a blueprint—referred to as the **MATHER TOOL**—to support PSBs and the Senedd in evaluating PSB activity using three key indicators:

1. **Intensity of Use Indicator:** Measures how intensively PSBs have used eight types of capital—financial, physical, human, intangible, ecological, cultural, social, and institutional—to pursue WFGA goals.
2. **Effectiveness Indicator:** Assesses how effective each type of capital has been in contributing to the WFGA’s seven well-being goals (which were further grouped in 4 types for simplifying the data gathering task for the PSBs).
3. **Efficiency Indicator:** Identifies which forms of capital are most crucial for achieving value-for-money outcomes.

Methodology

To develop these indicators, we created the MATHER TOOL framework and collected data according to it from the PSB Annual Reports since their establishment. We extracted information about the projects the PSB has implemented since its establishment, and the associated resources forms of capital) it had in its hands to operate with; then we conducted co-creative workshops with PSBs to validate and refine the data. This ensured all projects were accounted for and the used resources were accurately recorded in the data.

We applied the MATHER TOOL to this data to generate the three MATHER TOOL quantitative indicators. A second workshop was then held to interpret these indicators in the context of the PSB operations. This process was complemented by qualitative co-creation to extract a SWOT analysis—identifying strengths & weaknesses of the past operation by the PSB since 2018 and identified future opportunities and threats in PSB performance now on.

Key Findings and Recommendations

- **Funding Dependency:** PSBs have only been able to function effectively when supported by Shared Prosperity Fund (SPF) resources. Beyond this, they have relied heavily on goodwill from internal networks and the third sector. This goodwill is now exhausted, utilized at its maximum, and future productivity growth depends on stable, long-term funding.
- **Staff Turnover and Employment Stability:** High staff turnover and unstable contracts undermine PSB continuity. Permanent staffing is essential to ensure sustainable operations.
- **Resource Tracking and Management:** There is currently no systematic way to track PSB resources and activities over time. Annual Reports are qualitative and lack detailed matched resource to output data that can establish clearly the value for money. Institutional memory is fading due to staff changes, making retrospective analysis is costly and unreliable. A robust management system is needed to track resources, projects, and outcomes in alignment with the WFGA goals. The MATHER TOOL offers a blueprint for such a management system, improving transparency, continuity, and reporting.

Pilot Case: Neath Port Talbot PSB

Our example in this evidence focuses on Neath Port Talbot PSB – one of our pilot cases. The MATHER Team—comprising a quantitative lead, a qualitative researcher, and a junior researcher—collected and transformed qualitative data from their Annual Reports into quantitative indicators. This enabled a comprehensive assessment of the PSB Neath Port Talbot performance since 2018.

We attach the full MATHER TOOL Report prepared for Neath Port Talbot PSB based on using the data they collected by applying the MATHER TOOL blueprint for its analysis. We submit this report with their permission of the PSB to do so. The Neath Port Talbot PSB report presented as an appendix to this submission is intended to illustrate the potential of the MATHER TOOL to generate identical consistent, comparable reports for all PSBs in Wales.

PLEASE NOTE:

Continuation of the MATHER Project and Reflections on the Effectiveness of Guidance under the WFGA

Following the launch of the MATHER Project, we successfully secured an ESRC continuation grant for the WISERD project. As part of this WISERD extension, we incorporated a dedicated work package to expand the use of the MATHER TOOL across other PSBs—at no additional cost to the Senedd. This initiative reflects our strong sense of civic duty and our commitment to providing the specialist support needed to establish effective management systems for PSBs that best serve the community to achieve its value for money targets and fulfil its WFGA goals in most efficient ways.

We are fully aware of the current financial constraints across the board and have therefore taken these proactive steps to offer this support independently. We are pleased to share this development and hope our contribution will be welcomed and utilised.

II.

Response to Term of Reference 2: Effectiveness of Guidance under the Act

To address the second term of reference—**the effectiveness of guidance issued under the Act**—we offer the following reflection:

While the guidance has been detailed and explicit, in practice, **more is sometimes less**. The WFGA outlines 50 national indicators, grouped under its 7 well-being goals. However, the sheer volume and complexity of these indicators have made it difficult for PSBs to engage with them meaningfully. The extensive list can be overwhelming, especially given the limited financial and human resources available for data collection—an activity that is both time-consuming and requires quantitative expertise that many PSBs currently lack.

We propose three practical actions to improve the situation:

1. **Raise awareness** that the 50 indicators are structured under the 7 overarching goals, making them more approachable and conceptually manageable.
2. **Encourage PSBs** to report their activities in a simple but consistent manner aligned with the 7 goals, even if full 50 indicators coverage is not yet feasible.
3. **Build data capacity gradually**, supporting PSBs to improve data collection and move step-by-step toward comprehensive measurement of all 50 indicators.

PLEASE NOTE:

Clarifying a Key Misunderstanding

A major source of confusion for PSBs lies in the distinction between **locality-level performance** and **PSB-level contribution**. The 50 indicators measure the overall well-being of the locality, reflecting the combined efforts of local authorities, businesses, third-sector organisations, and communities. This is akin to measuring a region's GDP—it captures the big picture, not the specific contribution of any single actor.

The PSB, however, is just one player in this ecosystem. It can act as a catalyst or amplifier of collective efforts, but it cannot be held solely accountable for all outcomes. This is analogical to the following example, if an NGO works to reduce hunger, its success should be measured not by the total number of people fed in the locality, but by how many people the NGO directly helped or contributed to helping.

Using the 50 indicators to evaluate PSB performance risks two major pitfalls:

- **Over-crediting** PSBs when the locality performs well, without clear evidence of their specific contribution.
- **Unfairly penalising** PSBs when the locality performs poorly, even if the PSB has been highly effective within its remit.

This distinction is clear to those with quantitative training, but for many PSB staff, it will only become apparent when the consequences of mismeasurement are felt. The latter is likely to happen too late to be correctable, since a measurement system once put in place, is difficult to change due to all the cost that putting a measurement system in place entails at the first place.

Final Recommendation

It is essential to distinguish between:

- The **50 WFGA indicators**, which measure the overall performance of the locality in relation to the WFGA goals.
- The **need for PSB-specific tracking**, which should focus on the resources allocated to PSBs and the projects they support in relation to the WFGA goals.

Only by establishing a clear, evidence-based system for tracking PSB inputs and activities can we accurately assess their contribution to the WFGA. The MATHER TOOL offers a practical blueprint for this purpose that leads to evidence based value for money conclusions.

III.

To address the third term of reference—**how far the Act has been legally binding and enforceable, and how far it has represented and will continue to represent value for money**—our findings suggest the following:

There is a **genuine commitment and concern among PSBs** to support the WFGA to the best of their ability. Based on our research, the challenges PSBs face do not stem from a lack of commitment or a need for stronger legal enforcement. On the contrary, PSBs have sincerely endorsed the Act and demonstrate a high level of dedication to fulfilling its goals. They also collaborate effectively across PSBs to support each other in achieving shared objectives.

However, despite this strong commitment, PSBs are now encountering **serious operational challenges**. These include:

- Insufficient resources to retain staff.
- Limited capacity to employ the necessary skills for specific projects.
- A lack of robust management systems to track the growing volume of operational data over time.

In short, **value for money depends on the initial investment**. To assess this properly, we need a clear system for managing and mapping input resources and outputs in relation to the 7 WFGA goals. This requires:

- Systematic data collection on PSB inputs.
- Detailed tracking of PSB outputs, specifically in terms of projects aligned with the WFGA goals.

Implementing such a management and reporting system would enable PSBs to monitor their activities more effectively and demonstrate their contributions. It would also help the Senedd determine:

- What resources PSBs require.
- What strategic objectives to set.

- How to monitor whether PSBs are using resources effectively (covering all 7 goals) and efficiently (delivering the best value for money).

PLEASE NOTE:

A Case in Point: Cultural Capital

For example, our pilot research – including work with Neath Port Talbot PSB and other PSBs – revealed a strong commitment to issues related to **culture and cultural capital**, which is one of the 7 WFGA goals. PSBs are acutely aware of the importance of cultural interventions, particularly in:

- Supporting self-appreciation and identity.
- Maintaining cohesion across diverse communities.
- Addressing the socio-economic pressures and wellbeing aftermath of deprivation, unemployment, and global uncertainty.

These humanistic interventions are essential for fostering mutual respect of peoples' dignity and collective resilience. However, they **cannot be sustained by goodwill alone**. In economic terms, cultural capital is an **endogenous resource**—to activate it, PSBs need access to:

- Financial resources.
- Physical infrastructure.
- Intangible inputs such as creativity and ideas from all segments of society.

Therefore, PSBs should be empowered to **distribute financial incentives** that encourage equitable participation in offering intangible capital by all members of the community and ensuring a joint community-building effort by all citizens. This would allow the PSBs to mobilize local cultural capital effectively and support local flourishing through targeted, endogenous interventions. For further details, see Tubadji (2025).

I hope the above evidence is clearly presented. I remain available to provide further detail if needed.

I am submitting this evidence as an individual to ensure it is received within the deadline. Our final PSB workshop with Neath Port Talbot PSB took place on Monday of this week. Organising an institutional submission would require additional time. However, I am happy to submit this as the lead researcher of a project implemented with my team, in cooperation with the newly established **Local Challenges Research Office (LCRO)** at Swansea University. This office is dedicated to supporting the university's civic mission—helping the community and the Welsh Government access the knowledge and skills available at the university to promote the development and prosperity of Wales and its people.

Reference:

Tubadji, A. (2025) *Culture Based Development – Modelling Cultural Bias in Economic Choice*. Cheltenham: Edward Elgar.



TheProductivity Institute:

Investment in Places Policy Fellowship:
MANaging THE Roadmap (MATHER) Project



A MATHER TOOL

Project REPORT

for

PSB Neath Port Talbot

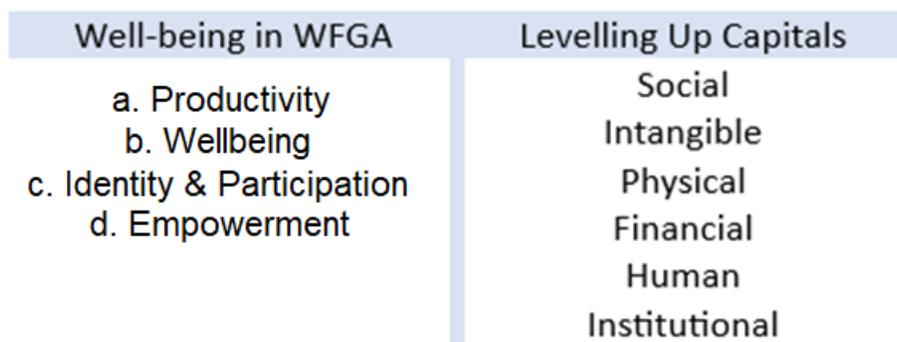
Version 19/06/2025

Introduction

The **MANaging THE Roadmap (MATHER)** Project is led by Swansea University's Local Challenges Research Office (LCRO) and is funded by ESRC through the Investment in Places Policy Fellowship of The Productivity Institute, Manchester. The MATHER Project aims to evaluate and enhance the strategic work of the Swansea and Neath Port Talbot Public Services Boards (PSBs) by mapping their activities since 2015 against the six Levelling Up capitals and 50 national wellbeing indicators under the Welsh Well-being of Future Generations Act (WFGA). Through a combination of quantitative and qualitative analysis, the project will produce an academic paper and a strategic SWOT analysis to inform future investment strategies and improve PSB effectiveness. This work is embedded within broader place-based research efforts through the Wales Institute of Social and Economic Research and Data (WISERD) and aligns with Welsh Government economic strategy, fostering dialogue and proposing new methods for evaluating long-term wellbeing outcomes.

The MATHER Project employs a comprehensive methodology (based on mixed methods, i.e. quantitative and qualitative ones) to evaluate the work of Swansea and Neath Port Talbot PSBs. It involves secondary data analysis of annual wellbeing reports since 2015, obtaining project lists with costs, conducting focus groups to map projects to the six capitals and 50 wellbeing indicators, and performing econometric analysis using multinomial logit models. Additionally, a SWOT analysis identifies strengths, weaknesses, opportunities and threats and untapped capitals in relation to the desired outcomes under the WFGA. The project aims to deliver cross-checking the quantitative results and backing them with further detailed understanding by conducting a SWOT analysis of the use of the capitals in co-creation effort with the PSB partners. Two workshops, academic papers, and feedback events synthesize progress and provide useful insights for future investment strategies. This report is the central outcome of these efforts.

In a nutshell, the core of the project entails mapping the resources utilized by the PSBs over their creation (INPUTS) and the projects they have delivered classified in form of Welsh Future Generations Act type of 50 possible outputs (grouped in 4 larger categories: a. Productivity, b. Wellbeing, c. Identity & Participation and d. Empowerment).



The MATHER Project generates the MATHER TOOL – a protocol for quantitative reporting for the intensity of use, effectiveness and efficiency with which the PSB taps on the various forms of capitals in order to achieve the WFGA-prescribed four big types of outcomes. This enables quantitative reporting for the work of the PSB with direct evidence based on which to start and motivate a strategic planning effort that appraises the work done in the past and plans for the future (as a SWOT analysis does). The MATHER Tool quantitative reporting entails specifically the gathering of data and its utilization to report on the PSB activity along three **performance indicators**:

Indicator 1: **Intensity of use** of each form of capital **Back Page 313**

*Indicator 2: **Effectiveness Indicator** – shows the impact from using 1 unit of capital for generating the output*

*Indicator 3: **Efficiency Indicator** – shows the PSB dependence on each capital for producing one unit of output*

From the above indicators, Indicators 2 & 3 can be classified in terms of **effectiveness** and **efficiency**, along the following reasoning:

Indicator 2: Impact from the use of a capital for the generation of each type of output

- **Classification: Effectiveness indicator**
- **Why:** This indicator measures the **outcome or impact** achieved from using a specific capital. It reflects how well 1 unit of capital contributes to achieving desired results (e.g., improved wellbeing, productivity, etc.). Effectiveness is about **doing the right things**—achieving the intended goals or outcomes.

Indicator 3: Capital/Output Ratio for the use of each capital

- **Classification: Efficiency indicator**
- **Why:** This indicator assesses the **input-output relationship**, i.e., how much capital is used to produce a unit of output. It reflects how economically resources are used—**doing things right**. A higher score implies lower efficiency, as less capital is needed per unit of output. Hence to improve PSB efficiency one has to pay highest attention to the highest scoring outcomes and how intensively they need to be used indeed.

The structure of this report is as follows. We will first summarize how the MATHER Project in co-creation exercise with the PSB Neath Port Talbot generated the data on INPUTS used and OUTPUTS generated by the PSB since its creation in 2018/2019 till today, based on the secondary information from the annual reports by the PSBs and the qualitative analysis, collaboration and cleaning of the data in a joint effort by the MATHER Project Team and the PSB Neath Port Talbot Team. Then we will implement the quantitative analysis using the MATHER Tool comprised of calculating the three types of indicators (Intensity of use, Effectiveness and Efficiency). Finally, we will complete the findings from the quantitative evaluation with a SWOT analysis by mapping the strategic findings from the SWOT to the obtained quantitative evidence (the three MATHER TOOL indicators) regarding the forms of capital and their use to obtain WFGA-desirable outcomes. The Structure of the rest of the report is as follows:

- I. INPUTS
- II. OUTPUTS
- III. MATHER TOOL REPORT ON THE USE OF INPUTS FOR WFGA OUTPUTS
- IV. A SWOT Analysis Application of the MATHER TOOL Indicators
- V. STRATEGIC RECOMMENDATIONS

I. INPUTS

A collaborative workshop was held with the Public Services Board (PSB) of Neath Port Talbot, facilitated by the MATHER Project team. The session established a shared understanding of six foundational forms of capital, which were then expanded to align with the eight forms of capital relevant within the framework of the Welsh Future Generations Act (WFGA) (see Tubadji, Jain & Avery 2025 for more details in this). These capitals serve as essential inputs in the PSB’s strategic planning and delivery processes, ensuring a holistic and sustainable approach to future development.

The eight forms of capital, along with their definitions, are presented below:

Form of Capital	Definition
Financial Capital	The financial resources available for investment, including savings, investments, and access to credit. It is crucial for funding businesses, infrastructure projects, and other economic activities.
Physical Capital	Infrastructure such as transport, energy, and digital networks. It encompasses the tangible assets that support economic activities and improve quality of life.
Human Capital	The skills, knowledge, and health of people. Investing in education, training, and healthcare enhances human capital, leading to a more productive and capable workforce.
Ecological Capital	The natural resources and ecosystems that provide essential services and benefits to humans, such as clean air, water, fertile soil, and biodiversity.
Intangible Capital	Non-physical assets such as intellectual property, innovation, and brand reputation. It represents the value derived from creativity, research, and development.
Cultural Capital	The amalgam of local attitudes, traditions, and beliefs represented in the arts, modern cultural participation, and preserved rituals.
Social Capital	The networks, relationships, and trust within a community. Strong social capital fosters cooperation, social cohesion, and collective action, which are essential for community development.
Institutional Capital	The quality and effectiveness of institutions, including governance, legal systems, and public services. Effective institutions create a stable environment for economic growth and social well-being.

This shared framework will support the PSB in embedding long-term thinking, collaboration, and sustainability into their decision-making processes by finding the quantitative evidence how much effort

it has put in and how much it can best organize itself in the future, in line with the goals of the Welsh Future Generations Act.

The projects implemented by the PSB Neath Port Talbot were extracted by the TPI MATHER Project Team and provided to the PSB Neath Port Talbot to clean. The PSB Neath Port Talbot identified four projects to be removed from the list. They also verified that each form of capital which has a 1 in the column opposite a project has been utilized for the implementation of this project. The form of capital that has a 0 in the column opposite a project has not been utilized for the implementation of this project.

Summary of OUTPUTS Section

The projects implemented by the PSB Neath Port Talbot were extracted by the TPI MATHER Project Team and provided to the PSB Neath Port Talbot to clean. The PSB Neath Port Talbot cleaned them and this informed the compilation of a database in which every project is a row and every form of capital is a column. When a capital is used in the project it is denoted with 1 and 0 otherwise in the corresponding column and row related to this project, as seen in the image below.

1	project	financial	physical	human	ecological	intangible	cultural	social	institutional
2	Early years	1	1	1	0	0	0	1	1
3	Safe Resili	1	1	1	0	1	1	1	1
4	Ageing We	0	0	1	0	1	0	1	1
5	~Making e	0	0	1	0	1	0	1	1
6	Well-being	0	0	1	0	1	0	1	1
7	Green Infr	1	1	1	1	1	0	1	1
8	Digital Incl	1	1	1	0	1	0	1	1
9	Sandfields	1	1	1	0	0	0	1	1
10	Building sa	1	1	1	0	1	0	1	1
11	Ageing We	0	0	1	0	0	0	1	1
12	Green Infr	1	1	1	1	1	0	1	1
13	Digital Incl	1	1	1	0	0	0	1	1
14	Substance	1	0	1	0	0	0	1	1
15	Suicide Pre	0	0	1	0	0	0	1	1

OUTPUTS

Next, the MATHER Team has classified all projects according to their fit to the 50 indicators for fulfilment of the Welsh Futures Generations Act (WFGA). The protocol for this classification is explained below:

Each WFGA **Indicator** has been categorized as one of four types: (i) a - PRODUCTIVITY; (ii) b - WELLBEING & ACCESS; (iii) c - IDENTITY & PARTICIPATION or (iv) d - EMPOWERMENT. Put differently, type a Productivity summarizes WFGA indicators that refer to unemployment, poverty, innovation and production in Wales. Type b. Wellbeing encompasses the health and wellbeing indicators, children rights and education. Type c. Identity & Participation encompasses the WFGA indicators that relate to equality, engagement of the community. Type d. Empowerment groups WFGA indicators concerned with leadership and agency by individuals in the community leading to social innovation and change, i.e. empowering community leaders.

This helps us to simplify, by grouping the 50 Indicators in a smaller number of categories of outputs. Thus, we can organize the detailed 50 Indicators list and their definition and technical measurement provided by the WFGA. Here is a succinct example of the application of the logic for classification:

EXAMPLE: Classification of Row 4 under "a - PRODUCTIVITY"

Table Snippet:

Indicator	Measurement	Technical Measurement
a - PRODUCTIVITY	Levels of nitrogen dioxide (NO ₂) pollution in the air	Annual average levels of NO ₂ pollution exposure measured in µg/m ³ (micrograms of gaseous pollutant per cubic meter of ambient air). Figures are calculated by modelling annual average concentrations, calibrated against national monitoring data, of nitrogen dioxide. A value is assigned to each residential dwelling (based on its square kilometre), and these are averaged across each census output area (geographic unit comprising around 150 properties). Average NO ₂ concentrations for higher geographies are calculated by taking a population weighted average over the constituent census output areas.

Explanation:

Thematic Relevance: Although air pollution is often associated with environmental or health concerns, in this context, it is classified under productivity because:

- Productivity affects air quality directly through the NO₂ emissions during production
- Reduced productivity will mean less movement of cars as well so indirectly it will also affect the environment.
- Environmental quality is a key enabler of sustainable economic activity, especially in urban and industrial areas because it attracts or repels inflow of workers, which are a vital input in productivity.

Policy Framing: The classification reflects a systems-thinking approach, where environmental indicators are not siloed but linked to broader economic and social outcomes.

Strategic Use: By placing this under 'PRODUCTIVITY', the indicator emphasizes the economic cost of pollution and the benefits of clean air for a productive society, focusing on what can be done to achieve reduction in the pollution and improvement in the air quality.

See Appendix 1 for the implementation of this logic for classification of all 50 WFGA indicators.

Summary of OUTPUTS Section

In a nutshell, the "Indicator" column provided by the WFGA List of Indicators is grouped in a **concise thematic label** (i.e., *a – PRODUCTIVITY, b – WELLBEING, c – IDENTITY & PARTICIPATION, d – EMPOWERMENT*) that groups and contextualizes the detailed data in the rest of the rows in the WFGA List of Indicators. It serves three main purposes:

1. **Categorization:** It classifies each data point into a broader policy or outcome area (e.g., economic, social wellbeing, equality and leadership relate outcomes), helping users quickly understand better the focus of each of the 50 WFGA Indicators.

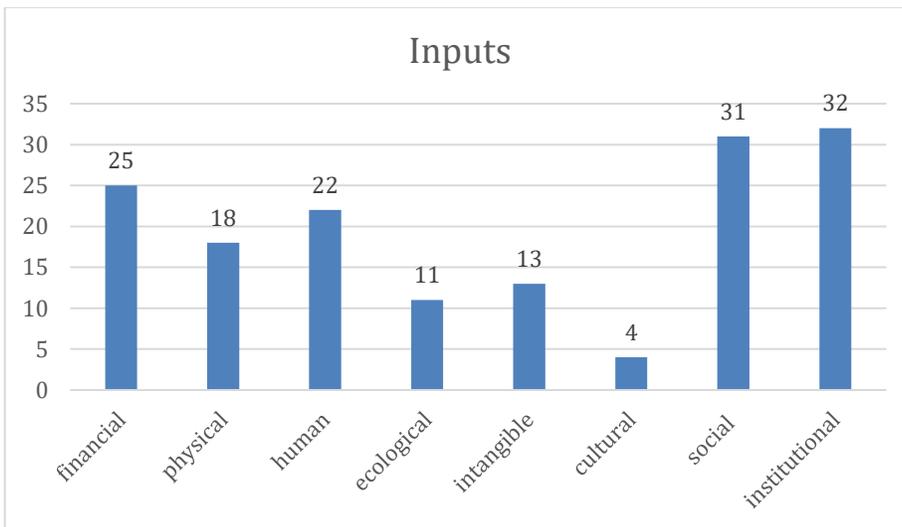
- Navigation:** It allows for easier filtering, comparison, and analysis across datasets of various projects (related to the output WFGA indicators) by grouping similar projects under a common theme.
- Interpretive Anchor:** It gives meaning to the technical and contextual details in the row, helping stakeholders interpret the relevance of the data in relation to strategic goals (e.g., improving wellbeing or reducing pollution).

This resulted in completing the dataset of inputs with four columns of outputs, aligned with the WFGA. The resulting full final dataset is presented on the image below:

project	financial	physical	human	ecological	intangible	cultural	social	institutional	possible	productive	wellbeing	identity	empower
Early years	1	1	1	0	0	0	1	1	1	1	1	1	1
Safe Resili	1	1	1	0	1	1	1	1	1	1	1	1	1
Ageing We	0	0	1	0	1	0	1	1	1	1	1	1	0
~Making e	0	0	1	0	1	0	1	1	1	1	1	1	0
Well-being	0	0	1	0	1	0	1	1	1	1	1	1	0
Green Infr.	1	1	1	1	1	0	1	1	1	1	1	1	0
Digital Incl	1	1	1	0	1	0	1	1	1	1	0	1	1
Sandfields	1	1	1	0	0	0	1	1	1	0	1	1	1
Building sa	1	1	1	0	1	0	1	1	1	1	1	1	1
Ageing We	0	0	1	0	0	0	1	1	1	0	1	1	0
Green Infr.	1	1	1	1	1	0	1	1	1	1	1	1	1
Digital Incl	1	1	1	0	0	0	1	1	1	1	0	1	0
Substance	1	0	1	0	0	0	1	1	1	0	1	1	1
Suicide Pre	0	0	1	0	0	0	1	1	1	0	1	1	1
Early years	1	0	1	0	1	0	1	0	0	1	1	1	0
Sandfields	1	1	1	0	0	0	1	1	1	1	1	1	1
Safe and V	1	1	1	0	1	0	1	1	1	1	1	1	1

II. MATHER TOOL REPORT ON THE USE OF INPUTS FOR WFGA OUTPUT

Indicator 1: Intensity of use of each form of capital

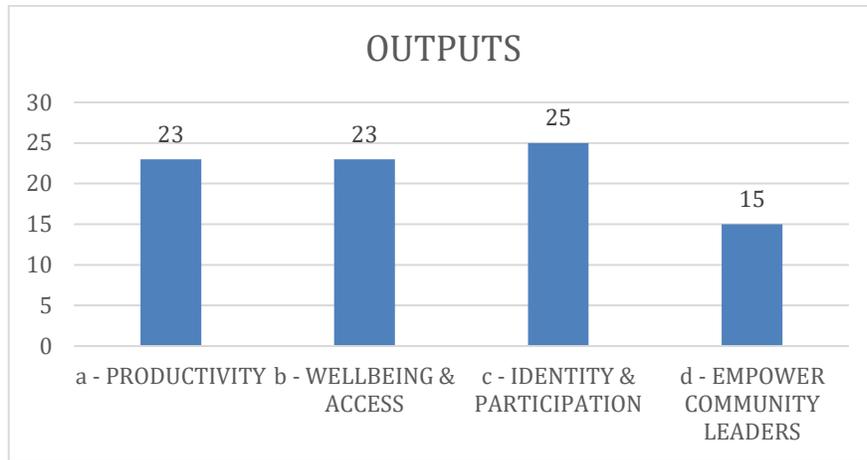


According to the co-created definitions for six forms of capitals, these capitals have been used with a varying intensity in the PSB Neath Port Talbot Projects. Namely, the PSB has been focused on using

financial, human and then physical capital most intensely, with heavy reliance on social capital and institutional capital across all types of projects in a non-discriminatory basis.

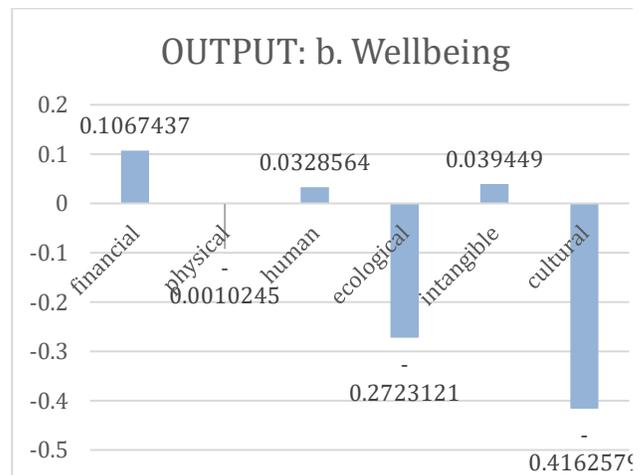
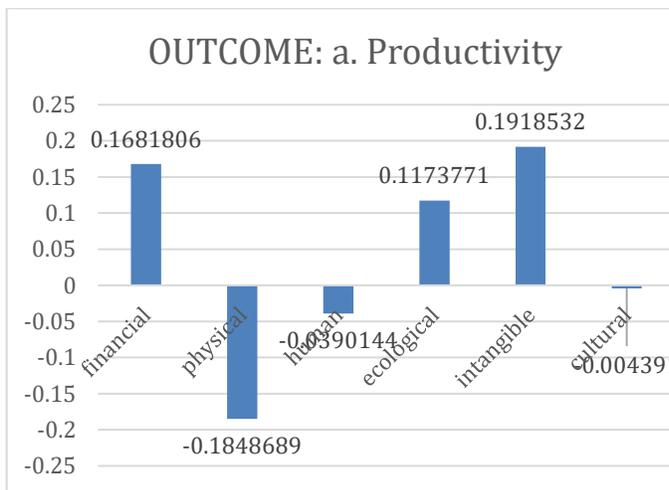
Put differently, the social and institutional capitals have been stretched to the limits. What has increased the output is mostly the availability of further finance, human capital (employment facilitation) and physical capital for the work of the PSB to be possible.

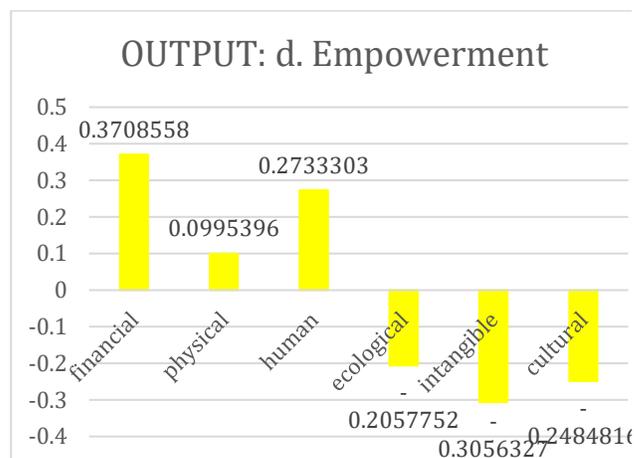
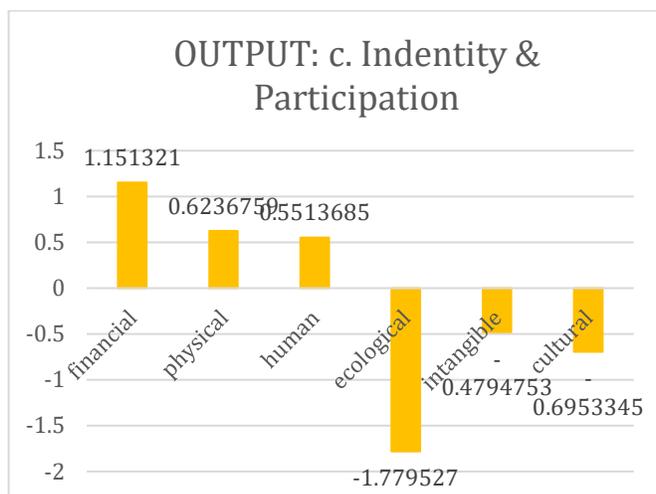
With these inputs projects in four types of outputs were generated. The figure below shows the total number of projects contributing to the WFGA type of output. Projects classed as a. and b. category are not the same, although their total number is the same.



The next two indicators, Indicato2 and Indicator 3 help us link the use of capital to the outputs produced. This is done vis a vis how much output is produced per unit of input (Indicator 2) and how much capita is needed per unit of output (Indicator 3).

Indicator 2: Impact from the use of 1 unite of capital (EFFECTIVENESS)





The bars present the size of the marginal effect from a probit model estimating the effect of one unit of each form of capital on the output of interest to be in the particular category of output (see Tubadji, Jain & Avery 2025). The marginal effect at the means (MEM) is used which refers to the change in the predicted probability of the outcome occurring, given a one-unit change in the use of a form of capital, holding all other variables at their mean values. The meaning of the above visuals is as follows:

Output a. Productivity has been generated mostly thanks to using intangible capital, and next financial capital, with ecological capital third in contribution to projects contributing towards productivity as in the WFGA.

Output b. Wellbeing has been generated mostly thanks to using financial capital, and next intangible capital, with human capital third in contribution to projects contributing towards wellbeing as in the WFGA.

Output c. Identity & Participation has been generated heavily thanks to using financial and next physical capital, with human capital third in contribution to projects related to identity & participation to be fulfilled.

Output d. Empowerment has been generated mostly thanks to using first financial and second human capital, and third relying on physical capital for generating projects important for empowerment as defined in the WFGA.

Indicator 3: Need for capital per 1 unit of output (***EFFICIENCY***)

Indicator 3 uses the ratio between Indicator 1 and Indicator 2. This ratio entails dividing the capital intensity of use versus capital intensity of impact, as shown in Table 1 below. It is best for use within a type of output but also between types of outputs especially when the number of projects in our case is one and the same. Below we will explain why.

	financial	physical	human	ecological	intangible	cultural	social	institutional
intensity of use of capital impact of capital on OUTPUT a PRODUCTIVITY	25	18	22	11	13	4	31	32
	0.17	-0.18	-0.04	0.12	0.19	0.00		
	148.65	-97.37	-563.89	93.72	67.76	-910.95		
intensity of use of capital impact of capital on OUTPUT b WELLBEING	25	18	22	11	13	4	31	32
	0.11	0.00	0.03	-0.27	0.04	-0.42		
	234.21	-17569.55	669.58	-40.39	329.54	-9.61		
intensity of use of capital impact of capital on OUTPUT c IDENTITY & PARTICIPATION	25	18	22	11	13	4	31	32
	1.15	0.62	0.55	-1.78	-0.48	-0.70		
	21.71	28.86	39.90	-6.18	-27.11	-5.75		
intensity of use of capital impact of capital on OUTPUT d EMPOWERMENT	25	18	22	11	13	4	31	32
	0.37	0.10	0.27	-0.21	-0.31	-0.25		
	67.41	180.83	80.49	-53.46	-42.53	-16.10		

The table above presents the calculations for Indicator 3 for each type of output. This means, that we have divided the number of projects generated per type (output) on the marginal impact on the output from one unit of increase of the particular input (capital). In other words, this is a more precise measure how strategically important is the effect of a capital for the generation of its impact on the outcome. The analysis can be done most meaningfully within a type of output. But it can be also used to compare across outcomes, especially as long as the number of projects and the forms of capitals used are the same or at least comparable in number.

Across outputs, financial capital, human capital and intangible seem most crucial for the efficiency of the PSB to produce wellbeing type of outputs. Physical capital is most crucial for the PSB efficiency to generate empowerment. Ecological capital is most crucial for PSB efficiency contribution to productivity. Cultural capital is most crucially related with efficiency of the PSB in association with identity & participation outcomes. (see top table on next page)

Within a type of output, productivity seems most crucially affected efficiency-wise by inputs of type financial capital. Wellbeing is most importantly affected efficiency-wise by the use of human capital. The same applies for identity and participation as an outcome. Empowerment outcomes seem most importantly efficiency affected by physical capital among all forms of capital. (see bottom table on next page).

Analysis of An Input across Outputs

	financial	physical	human	ecological	intangible	cultural	social	institutional
intensity of use of capital impact of capital on OUTPUT a PRODUCTIVITY	25	18	22	11	13	4	31	32
	0.17	-0.18	-0.04	0.12	0.19	0.00		
	148.65	-97.37	-563.89	93.72	67.76	-910.95		
intensity of use of capital impact of capital on OUTPUT b WELLBEING	25	18	22	11	13	4	31	32
	0.11	0.00	0.03	-0.27	0.04	-0.42		
	234.21	-17569.55	669.58	-40.39	329.54	-9.61		
intensity of use of capital impact of capital on OUTPUT c IDENTITY & PARTICIPATION	25	18	22	11	13	4	31	32
	1.15	0.62	0.55	-1.78	-0.48	-0.70		
	21.71	28.86	39.90	-6.18	-27.11	-5.75		
intensity of use of capital impact of capital on OUTPUT d EMPOWERMENT	25	18	22	11	13	4	31	32
	0.37	0.10	0.27	-0.21	-0.31	-0.25		
	67.41	180.83	80.49	-53.46	-42.53	-16.10		

Analysis Inputs within An Output

	financial	physical	human	ecological	intangible	cultural	social	institutional
intensity of use of capital impact of capital on OUTPUT a PRODUCTIVITY	25	18	22	11	13	4	31	32
	0.17	-0.18	-0.04	0.12	0.19	0.00		
	148.65	-97.37	-563.89	93.72	67.76	-910.95		
intensity of use of capital impact of capital on OUTPUT b WELLBEING	25	18	22	11	13	4	31	32
	0.11	0.00	0.03	-0.27	0.04	-0.42		
	234.21	-17569.55	669.58	-40.39	329.54	-9.61		
intensity of use of capital impact of capital on OUTPUT c IDENTITY & PARTICIPATION	25	18	22	11	13	4	31	32
	1.15	0.62	0.55	-1.78	-0.48	-0.70		
	21.71	28.86	39.90	-6.18	-27.11	-5.75		
intensity of use of capital impact of capital on OUTPUT d EMPOWERMENT	25	18	22	11	13	4	31	32
	0.37	0.10	0.27	-0.21	-0.31	-0.25		
	67.41	180.83	80.49	-53.46	-42.53	-16.10		

III. A SWOT Analysis Application of the MATHER TOOL Indicators

Strengths	Weaknesses
<p><u>Finance</u> Shared Prosperity Funds (SPF) Grant funding for staff to drive work Financial Warm Hubs Grant Food Poverty Grant from Welsh Local Government Association (WLGA)</p> <p><u>Social</u> Third sector goodwill Goodwill of PSB partners</p> <p><u>Intangible</u> Low Income Family Tracker (LIFT)</p> <p><u>Human</u> Staff employed to drive work of the PSB</p> <p><u>Institutional & Human</u> Input of the Health Board has increased</p>	<p><u>Finance</u> PSB grant limited criteria for spending</p> <p><u>Financial of Physical</u> Problems with storage of budgets WLGA grants – example Food Poverty and Warm Hubs programmes Year on year funding</p> <p><u>Physical</u> Transport Access to opportunities Difficult to get meeting room for free</p>
Opportunities	Threat
<p><u>Human</u> Data analysis Trailblazer (economic inactivity project) More staff with specialized skills (e.g. AI, econometrics) Opportunities to work with educational partners to grow skills for new jobs e.g. green</p> <p><u>Human or institutional</u> Health Board increased engagement in PSB</p> <p><u>Physical and Intangible</u> Wellbeing data portal</p> <p><u>Cultural capital</u> Promote the heritage across the area</p> <p><u>Ecological</u> Electric furnace TATA</p> <p><u>Intangible</u> Wales as a Marmot nation</p>	<p><u>Financial</u> SPF don't know when it will come to an end <i>Short term funding not fit for long term partnership engagement and WLGA principles and envisioned outputs</i> Limited budgets for supporting outputs of type d. Empowerment and development of local intangible capital - 'think outside the box' Partner budget getting tighter</p> <p><u>Human</u> Lack of skills/reskilling for new jobs e.g. green Threat to young people health and wellbeing and increasing economic inactivity – young people are not choosing the skills relevant for the future Young people not choosing skills for the future – e.g. digital, data, green</p> <p><u>Human & intangible</u> If overlooked to support outcome type d. Empowerment to develop human and intangible capitals locally then people psychology will spiral downwards, polarization, loss of optimism in case of job loss, illness and mental health issues will increase</p> <p><u>Institutional</u> Regional partnership boards and funding – fire-fighting vs PSB thinking long-term</p> <p><u>Institution & finance</u> Not having the right people at the senior level</p> <p><u>Cultural</u> Perceptions around the future, e.g. TATA Steel and leadership</p> <p><u>Social & institutional</u> Governance matters - equality of opportunity between partner organizations (e.g. power of Regional Council versus Communities for Voluntary Services (CVS))</p>

The PSB participants in Workshop 2 were prompted to deliberate on each form of capital in terms of past strength or weakness for their activity and if seen as a future opportunity or threat. They were given 3 min for this deliberation. Yet, their discussion was much more intense on certain forms of capital than others. Below, we match this qualitative strategic exercise to the quantitative findings presented aforehand.

INTENSITY OF USE INDICATOR 1 & SWOT

Financial capital

Financial capital has stood out in the quantitative analysis according to Indicator 1 as the most often tapped on form of capital. The qualitative SWAT analysis concurs with this importance of finance, which was noted in both Strength and Opportunities and very well detailed in terms of Threats considerations.

The Strengths come from the enabling role of SPF and WLGA. The Weaknesses of SPF is that it is accessed by application and there is no guarantee for this money to be available on a sustainable basis.

Threats were particularly articulated over the SWOT analysis discussion. Finance wise, the SPF might be interrupted as funding. Also, funding is provided with short term orientation while the WLGA envisioned and required outputs are for long term results and future generations oriented. Furthermore, it is felt that special type of activities require more financial support, such as finance for outputs of type d. Empowerment. Further to this, the dependence of PSB on partner's budget makes them sensitive to threats for cuttings in their partners' budgets.

Thus overall, a need for financial stability and sustainability, as well as finance channeled in particular strategic priorities is required.

Physical Capital

Physical capital seems to be third in intensity of use by PSB according to Indicator 1. However, the PSB has noted it as a weakness in its practice. The reason for this is that they have no real physical base and need to share and rely on partners eventual availability of physical resources, meeting space etc. This creates a lack of stability and sustainability of the work process.

Yet, the PSB sees some of its current pilot initiatives such as the creation of a joined data portal as an opportunity to have some special physical capital in the hands of the PSB specifically. Yet, physical capital seems not prioritized among what the PSB perceives as threats for the future and the reason for this is concurrent with the fact that still physical capital was available and employed heavily in their output even if made available through partners.

Human Capital

Human capital is second in intensity of use according to Indicator 1, closely following only after financial capital in importance. Its relevance was clearly confirmed as a strength in the PSB operation. Yet, it was often discussed that the PSB does not actually have specially hired staff but shares human resource from partners, which itself creates instability in the system, especially if people rotate at certain positions. And also the PSB considers working along the lines of ensuring skilled employment in the PSB team and working with educational partners in the spirit of learning cities as an opportunity for the future. However, their concerns about human capital extend beyond the remit of the PSB and were discussed in terms of what human capital the localities need to breed through education especially of the young but also reskilling unemployed people. In these terms, the PSB felt that cultural capital and intangible capitals

need to be flagged as more important and put forward in planning outputs of type d. Empowerment. Put differently, it was a shared opinion that local leadership and support for positive attitude formation in the society and creative ideas will be a crucial overlooking if outputs are not focused on these types of interventions by the PSB and the local authorities more broadly in order to support the human capital in the localities.

Ecological Capital

Ecological capital is overall almost out of the focus of the SWOT considerations. According to the quantitative analysis ecological and cultural capital are the least exploited types of capital by the PSB. The SWOT makes provisions for certain higher level of consideration of cultural capital, and some consideration of the wetlands and air turbines were mentioned as a potential opportunity, as well as the electric furnace of TATA. But still it seems that ecological capital was generally the most deprioritized capital in the discussions of the SWOT.

Intangible

Intangible is the third least used form of capital according to Indicator 1. It was also not very intensively discussed in the SWOT discussion. The strength mentioned in relation to the intangible capital was the success story of the Low Income Family Tracker (LIFT), which the PSB initiated and created as a knowhow and database to be relied on and can help for future work with financial vulnerability and deprivation character. Weakness-wise, it was also relatedly mentioned that even when ideas for cooperation emerge sometimes the funds are not available to ensure these novel ideas from the PSB can be implemented.

Intangible capital is still highly regarded by the PSB, as the members see various opportunities for novel ideas for cooperation in the lines of health equality (Marmot nation) and creation of blue print for data portal and quantitative reporting by the PSB. However, clearly these opportunities are also financially endogenous and dependent on financial support. It was clearly mentioned as a threat that overlooking not only PSB but also local intangible capital can lead to loss of social cohesion and going down in the spiral of human flourishing.

Cultural Capital

Cultural capital was the least utilized form of capital according to Indicator 1. That is particularly striking given the high regard and attention that the WFGA bestows to culture and participation. In contrast to this, the PSB discussed very avidly cultural capital in terms of future opportunities and threats. They perceive the cultural heritage of the place (wetlands) as well as the living culture (festivals) as opportunities for intervening in the local attitudes and social climate in a positive way. However, they are very keenly aware that it is a threat for the localities if cultural capital interventions are not deployed locally and people are left alone to handle their shifting perceptions due to loss of job (TATA Steel) and similar increasing deprivation circumstances.

Social Capital

Social capital was one of the almost inevitably tapped on resources according to Indicator 1. It was used in 31 out of the 33 projects. This means that the connections between people in the PSB and their networking is what ensured the functioning of the PSB and its ability to operate in spite of having no physical base of its own. That is why clearly social capital was mentioned as a strength in the past but also as a threat for the future to keep over-relying on social capital as input since its applicability is only to be

an amplifier. Therefore, without more financial and human resources just the good will of partners and third sector cannot sustainably ensure further growth and sustainable flourishing trajectory.

Institutional Capital

Institutional capital is the most highly tapped on form of capital according to Indicator 1. It was used in 32 out of 33 projects. And it is indeed mentioned throughout the swot discussion in all boxes, but Weaknesses. It was, however, highlighted that the institutional success was with a heterogenous character. Among strengths, the success story of the Health Board was mentioned, where indeed human capital was ensured and institutional restructuring was made to enable better PSB engagement. Carrying this example into the future and replicating it in other domains was seen also as an opportunity. However, it was flagged that due to institutional power dominance of the Regional Partnership Boards (RPB), financial capital for the PSB might not be secured due to between-institutions competition for resources. Further to this, concerns for the lack of communication between lower and more senior levels of the institutional structure in PSBs was discussed.

In conclusion, the SWOT analysis seems consistent with the quantitative results of Indicator 1 and clarified the economic meaning of Indicator 1 through the qualitative discussion during SWOT. Let us reconsider the SWOT analysis from the view point of Indicator 2 (effectiveness) and Indicator 3 (efficiency).

EFFECTIVENESS INDICATOR 2 & SWOT

According to Indicator 2, for outcomes of type a. Productivity, what contributes most is intangible, financial and then ecological capital. Financial and intangible were somewhat discussed in the SWOT (even though finance got more attention than intangible, while Indicator 2 shows the latter is more effective for generating a. Productivity type outputs). Moreover, ecological capital which is third in effectiveness for this type of outcome was very little debated. **So, the quantitative analysis highlights eventual omission of a strategic priority (using ecological capital) for a. Productivity outcomes.**

Regarding output type b. Wellbeing, the most impactful capitals are financial, intangible and human. All of these forms of capitals were heavily considered during the SWOT analysis and this gives a very positive signal that the PSB are strategically indeed oriented towards ensuring what drives most impactfully the local wellbeing both in the past and looking forward.

Regarding the effectiveness of generating output of type c. Identity & Participation, the most important forms of capital according to Indicator 2 are financial, physical and human capital. Again, the SWOT discussion confirmed and clarified and engaged with these forms of capital. And it did so with clear consideration of equality (esp. health equality but also other forms of deprivation locally)

Regarding d. Empowerment, most impactful forms of capital as input are: financial, human and physical. It is noteworthy that while the PSB has clear strategic focus on this type of outputs and praises its importance, the PSB also flags the need of special physical capital and human capital as well as further focused financial capital especially secured for output in the domain of d. Empowerment. This is fully justified as a claim both in terms of the relevance of these capitals as most effective inputs for d. Empowerment type outputs according to the quantitative evidence given by Indicator 2 and also based on general economic knowledge of endogeneity of tapping on cultural capital that affects attitudes and empowerment (see Tubadji 2025).

EFFICIENCY INDICATOR 3 & SWOT

Let us now reconsider the Efficiency Indicator 3 and its meaning in the context of our SWOT analysis. Indicator 3 was discussed in terms of across outputs and within an output, we will follow this logic here.

According to Indicator 3, the most important for efficiency improvement forms of capital across all forms of outputs per se are human, intangible and then financial. The SWOT demonstrated that these are well tapped on, strategically considered, however all of them were categories as experiencing certain threats. This means that the most powerful fuels of the PSB work are not so readily available to the PSBs at present and they see this situation potentially worsening in the future. An Indicator 3 supports this with quantitative evidence.

Within each type of output, Indicator 3 tells us the following story:

- Regarding output a. Productivity, the most important efficiency-wise input is financial capital.
- Regarding output b. Wellbeing, the most important efficiency-wise input is human capital
- Regarding output c. Identity & Participation, it is human capital
- Regarding output d. Empowerment, the most important efficiency-wise input is physical capital

All these three types of capitals – financial, human and physical are seen un the SWOT by the PSB as potentially insufficient in availability in the future. It is highly important to note the poor availability of physical capital that apparently is most efficiency-sensitive for achieving outputs of type d. Empowerment is not available. Put differently, it seems it takes most public good, transport infrastructure and accessibility to be available as an input to generate outputs of type d. Empowerment. When these are scarce this output type will suffer the most in its efficiency. The PSB flagged clearly concerns about the utmost importance to ensure leadership and agency related outputs, in the context of growing deprivation, and related polarization and mental health complication among the population. Yet, they did not underline the importance of physical capital in this regard. While the quantitative analysis shows that providing them with physical capital seems to mean providing them with the most critical capital through which they can tackle these issues and produce output relevant to type d. Empowerment.

Cultural capital was very much marginal in the SWOT discussion. It is also across all indicators 1,2 & 3 shown to be least intensively used, but according to Indicator 3, it is most crucial for efficiency of producing outputs of type c. Identity & Participation. This means that tapping on local cultural capital more intensively in the future will help the most for the achieving outputs related mostly to achieving the WFGA indicators which concern equity, inclusion, participation and above all – leadership and agency.

IV. STRATEGIC RECOMMENDATIONS

We will synthesize below the strategic recommendations on the basis of the use of the quantitative MATHER Tool in combination with a qualitative SWOT analysis. These recommendations will be structured as follows: recommendations to the PSB itself and then towards the Welsh Government.

Recommendations to PSB

Firstly, clearly the quantitative Indicator 1 shows that cultural capital is the most under-utilized form of capital by the PSB. This is a discrepancy with the WFGA focus on culture. Using cultural capital is also theoretically and according to Indicator 3 in the case of this PSB most crucial for the efficient delivery of the d. EMPOWERMENT outputs, which the PSB highlighted as crucial in terms of the need of leadership in times of rising deprivation, joblessness and related shifting perceptions and mental health issues of the local population. The performance of the PSB till now quantitatively demonstrates the relevance of this form of capital and its underutilization. Hence, the PSB is entitled to ask for the necessary financial, human and physical resources with which to activate its use of the endogenous cultural capital of places for enabling local socio-economic wellbeing and flourishing through stimulating leadership locally. See also Tubadji (2025) on why cultural capital is crucial for d. EMPOWERMENT outcome and how local policy makers can tap on cultural capital most successfully. **Secondly**, ecological capital has to be more actively considered as well, since it seems related to productivity outputs. It was somewhat marginalized just as human capital, but with relevance to output a. Productivity in this case.

Recommendations to the Welsh Government

Firstly, the PSB seems to have exploited social capital and the existing institutional capital to their limits. They need to receive more stable access to financial capital and human capital as well as expanded institutional capital opportunities in order to be able to bring growth in the output of the PSB. **Secondly**, according to Indicator 1, cultural capital is the most underexploited form of capital while most critical for efficient delivering outputs of type d. Empowerment. The PSB should be provided by the Government with special line of financial, human and physical resources through which to activate its use of the endogenous cultural capital of places for enabling local socio-economic wellbeing and flourishing locally. There is clear commitment by the PSB to work on cultural capital related issues as important for the wellbeing of the community, to widen the PSB consultation and to work on local attitudes. Using cultural capital, however, depends on having the means (financial, human and physical) to tap on cultural capital. **Thirdly**, alignment should be ensured between the short-term temporal horizon of providing funding and the expected long-term-oriented outcomes desired by the WFGA and its 50 indicators. To achieve this alignment, the room for power competition between the regional boards and the PSBs should be diminished too. Finally, human capital should be available on a permanent basis to avoid dissipation of resource and loss of sustainability due to human capital turnover.

References:

Tubadji, A., Jain, Y & T. Avery (2025) *Quantifying the Six Forms of Capital and their Impact on Welfare & Wellbeing in Wales*. The TPI Institute, forthcoming.

Tubadji, A. (2025) *Culture Based Development: Modelling Cultural Bias in Economic Choice*. Cheltenham: Edward Elgar.

Appendix 1

output	WFGA - National Indicator technical descriptions and data links		
	Indicator	Measurement (this is the indicator as laid)	Technical measurement (this is the full technical description of the indicator, where appropriate)
b - WELLBEING & ACCESS	1	Percentage of live single births with a birth weight of under 2,500g	Low birth weight is associated with health risks in an infant's first year of life. The indicator will be based on singleton births (with a stated birth weight) and will be calculated as the percentage of births that are <2,500 grams. Denominator: All singleton live births.
b - WELLBEING & ACCESS	2	Healthy life expectancy at birth including the gap between the least and most deprived.	Healthy life expectancy at birth, plus the gap in healthy life expectancy between the most and least deprived areas. The gap is measured using the slope index of inequality initially, planned to change to the absolute gap. Separate figures will be provided for males and females.
b - WELLBEING & ACCESS	3	Percentage of adults with two or more two healthy lifestyle behaviours	Percentage of adults (aged 16+) with two or more two healthy lifestyle behaviours (not smoking, healthy body mass index, eat five portions fruit or vegetables, not drinking above weekly guidelines, meet guidelines on weekly minutes of physical activity)
a - PRODUCTIVITY	4	Levels of nitrogen dioxide (NO2) pollution in the air.	Annual average levels of nitrogen dioxide (NO2) pollution exposure measured in µg/m ³ (micrograms of gaseous pollutant per cubic meter of ambient air). Figures are calculated by modelling annual average concentrations, calibrated against national monitoring data, of nitrogen dioxide. A value is assigned to each residential dwelling (based on its square kilometre), and these are averaged across each census output area (geographic unit comprising around 150 properties). Average NO2 concentrations for higher geographies are calculated by taking a population weighted average over the constituent census output areas.
b - WELLBEING & ACCESS	5	Percentage of children with two or more two healthy lifestyle behaviours	Percentage of children with two or more two healthy lifestyle behaviours (not smoking, eat fruit or vegetables daily, never or rarely drink, physically active for an hour a day). Uses the Student Health and Wellbeing Survey which runs every two years, and covers school years 7-11 (children aged 11-16).
b - WELLBEING & ACCESS	6	Measurement of development of young children	A measurement of the development of young children using the on-entry assessments of children in reception class in schools, which are part of the Foundation Phase Profile. Progress will be tracked using the Personal, Social Development, Well-Being and Cultural Diversity area of learning. Further information on the Foundation Phase Profile can be found at: https://beta.gov.wales/foundation-phase-framework
b - WELLBEING & ACCESS	7	Average capped 9 points score of pupils, including the gap between those who are eligible or are not eligible for free school meals. (This has replaced the level 2 threshold measure)	Average capped 9 points score of pupils. The capped 9 measure was introduced in 2016/17 and focuses on Year 11 pupils' results from a maximum of nine of the qualifications available in Wales, including subject specific requirements. These will include analysis of the gap between those who are eligible or are not eligible for free school meals. (This has replaced the level 2 threshold measure)
a - PRODUCTIVITY	8	Percentage of adults with qualifications at the different levels of the National Qualifications Framework.	Percentage of adults of working age with qualifications at the different levels of the National Qualifications Framework for England, Wales and Northern Ireland. (NQF EWN1) In Wales the NQF EWN1 forms part of the Credit and Qualifications Framework for Wales
a - PRODUCTIVITY	9	Gross Value Added (GVA) per hour worked (relative to UK average)	Gross Value Added (GVA) per hour worked (relative to UK average) using the income measure of GVA
a - PRODUCTIVITY	10	Gross Disposable Household Income per head	Gross Disposable Income per head according to ONS definition

a - PRODUCTIVITY	11	Percentage of businesses which are innovation-active	Innovation-active businesses defined as per the BIS community innovation survey.
a - PRODUCTIVITY	12	Capacity (in MW) of renewable energy equipment installed	Capacity (in MW) of renewable energy equipment installed. This represents the maximum continuous rating of the generating sets in the renewable energy stations in Wales in megawatts. This is often referred to as 'installed capacity'. Concentration of carbon and organic matter in soil; measured as soil carbon and organic matter content of topsoil (0-15cm) measured in grams of carbon per kilogram (gC per kg). Measured from soil samples using the loss on ignition methodology to determine the soil carbon concentration
b - WELLBEING & ACCESS	13	Concentration of carbon and organic matter in soil	Samples are taken from across all of Wales' 26 land classes, for the Countryside survey element of the Glastir Monitoring and Evaluation Programme (GMEP). This is conducted in 300 1km sample squares and is intended to cover all of Wales. The survey does, however, exclude densely developed city areas and therefore it should not be considered as an inventory for brownfield sites. An global footprint is an indicator of the total environmental burden that society places on the planet. It represents the area of land needed to provide raw materials, energy and food, as well as absorb pollution and waste created and is measured in global hectares.
a - PRODUCTIVITY	14	The global footprint of Wales	The global footprint for a particular population is defined as: "the total area of productive land and water ecosystems required to produce the resources that the population consumes and assimilate the wastes that production produces, wherever on Earth that land and water may be located". The global footprint is influenced by the food people eat, the way they travel and the energy they use in the home. It also accounts for the purchase of products and services from insurance to televisions to items of clothing. Finally, it also includes impacts from construction activity and investment in infrastructure.
a - PRODUCTIVITY	15	Amount of waste generated that is not recycled, per person.	Total amount (kg) of residual waste (i.e. waste that is not reused, recycled or composted) in Wales, by all sectors, on a per person basis. This indicator is calculated from three separate elements - Household waste, Construction and Demolition (C&D) waste and Industrial and Commercial (I&C) waste.
a - PRODUCTIVITY	16	Percentage of people in employment, who are on permanent contracts (or on temporary contracts, and not seeking permanent employment) and who earn at least the real Living Wage	Permanent contracts and those on temporary contracts and not seeking permanent employment as defined by questions in the Labour Force Survey. Further details on the measure of those earning the real Living Wage will be added as soon as possible
b - WELLBEING & ACCESS	17	Pay difference for gender, disability and ethnicity	Difference in average (median) full-time hourly earnings between males and females. In December 2021, this indicator was extended to include ethnicity and disability pay gaps as well as gender. These are sourced from the Annual Population Survey and are measured as the difference in average (median) hourly earnings between disabled and non-disabled employees, and between White British and other ethnic groups. Both indicators are based on those who report being either full-time or part-time employees and they both include overtime.
a - PRODUCTIVITY	18	Percentage of people living in households in income poverty relative to the UK median, measured for children, working age and those of pension age.	Percentage of people living in households below 60% of the median UK income, measured for children, working age and those of pension age (measured after housing costs).
a - PRODUCTIVITY	19	Percentage of people living in households in material deprivation.	Percentage of households who cannot afford particular goods and activities that are typical in society at a given point in time, irrespective of whether they would choose to have these items, even if they could afford them.

c - IDENTITY & PARTICIPATION	20	Proportion of employees whose pay is set by collective bargaining	Further details on the measure of for this indicator will be added as soon as possible
a - PRODUCTIVITY	21	Percentage of people in employment.	Percentage of the working age population in work.
a - PRODUCTIVITY	22	Percentage of people in education, employment or training, measured for different age groups.	Percentage of people in education, employment or training at the end of each calendar year measured for different age groups.
d - EMPOWER COMMUNITY LEADERS	23	Percentage who feel able to influence decisions affecting their local area.	Percentage of adults (aged 16+) who agree or strongly agree with the statement: I can influence decisions affecting my local area.
b - WELLBEING & ACCESS	24	Percentage of people satisfied with their ability to get to/ access the facilities and services they need.	Percentage of adults (aged 16+) who feel satisfied that good services and facilities are available in their local area, and with their ability to get to these services and facilities.
b - WELLBEING & ACCESS	25	Percentage of people feeling safe at home, walking in the local area, and when travelling.	Percentage of adults (aged 16+) who report feeling very safe or fairly safe in all of the following situations: at home after dark, walking alone after dark, travelling by public transport after dark, and traveling by car after dark.
c - IDENTITY & PARTICIPATION	26	Percentage of people satisfied with local area as a place to live.	Percentage of adults (aged 16+) who report feeling very or fairly satisfied with their local area as a place to live
c - IDENTITY & PARTICIPATION	27	Percentage of people agreeing that they belong to the area; that people from different background get on well together; and that people treat each other with respect.	Percentage of adults (aged 16+) agreeing with three statements about their local area; feeling they belong to the area; that people from different background get on well together; that people treat each other with respect.
c - IDENTITY & PARTICIPATION	28	Percentage of people who Volunteer.	Percentage of people (aged 16+) who volunteer: measured by the percentage of adults who give their time for free to help clubs or organisations (formal or informal) ; or who support family members, friends, neighbours or others because of long-term physical or mental ill-health or disability, or problems related to old age. For adults (aged 16 or over), the mean mental well-being score according to the Warwick-Edinburgh Mental Well-being Scale (WEMWBS). http://www2.warwick.ac.uk/fac/med/research/platform/wemwbs/
b - WELLBEING & ACCESS	29	Mean mental well-being score for people.	For children, the mean score using the Strengths and Difficulties Questionnaire (information from the Understanding Society survey). http://www.sdqinfo.com/

A score is calculated for each household based on weighted totals across a maximum of nine different measures. The weight for each measure is the proportion of the total population who have that item. For each measure a household is then assigned the weight if they do not have that item, these are summed across all items (and divided by a factor to ensure all scores fall on a scale from 0 to 100) to make a total deprivation score. Items that most people have are weighted more heavily, so if a household lacks that item then it counts more towards the overall deprivation score than an item that fewer people have. Households with a score of 25 and over are classified as materially deprived.

Note: The Family Resources Survey (FRS) produces material deprivation scores for the UK but these are not comparable to National Survey deprivation figures due to different methods used.

b - WELLBEING & ACCESS	30	Percentage of people who are lonely.	Percentage of adults (aged 16+) who are lonely according to the De Jong Gierveld loneliness scale.
b - WELLBEING & ACCESS	31	Percentage of dwellings which are free from hazards.	Percentage of dwellings which are free from Category 1 Housing Health and Safety Rating System (HHSRS) hazards. Category 1 hazards are those providing the greatest risk to occupants. Data on hazards come from the Welsh Housing Conditions Survey (WHCS) 2017-18. Qualified surveyors carried out non-invasive inspections on a sample of dwellings in Wales across all tenures.
b - WELLBEING & ACCESS	32	Number of properties (homes and businesses) at medium or high risk of flooding from rivers and the sea.	Total number of properties (residential and non-residential) at high or medium risk of flooding from rivers and the sea High risk: greater than 1:30 chance of flooding Medium risk: 1:30 to 1:100 chance of flooding
a - PRODUCTIVITY	33	Percentage of dwellings with adequate energy performance.	Percentage of dwellings with a Standard Assessment Procedure (SAP) rating of 65 or above. The Standard Assessment Procedure (SAP) is a methodology used by Government for assessing the energy performance of dwellings. The SAP rating is expressed on a scale of 1 to 100 – the higher the number, the lower the running costs.
b - WELLBEING & ACCESS	34	Number of households successfully prevented from becoming homeless per 10,000 households.	Number of household threatened with homelessness(within 56 days) who were successfully prevented from becoming homeless for at least 6 months – rate per 10,000 households
c - IDENTITY & PARTICIPATION	35	Percentage of people attending or participating in arts, culture or heritage activities at least 3 times a year.	Percentage of adults (16+) who have attended arts events, participated in arts activities, or visited heritage sites, museums, libraries and/or archives at least 3 times in the last 12 months. Arts events include: film showing, theatre, live music, dance performance, storytelling or reading events, and other arts events. Arts activities include: music, drama/theatrical activity, dance, film-making/photography, visual arts and crafts, creative writing, making art work/animation using digital technology, and circus skills.
c - IDENTITY & PARTICIPATION	36	Percentage of people who speak Welsh daily and can speak more than just a few words of Welsh.	Percentage of people who report in response to questions in the National Survey for Wales (for adults 16+ annually) and Welsh Language Use Surveys (for people 3+) that they are able to speak more than 'just a few words' in Welsh and that they speak Welsh on a daily basis.
c - IDENTITY & PARTICIPATION	37	Number of people who can speak Welsh.	Number of people who reported in the census that they can speak Welsh
b - WELLBEING & ACCESS	38	Percentage of people participating in sporting activities three or more times a week.	Percentage of the population who report taking part in any outdoor or indoor sporting activity, and the frequency of their participation
c - IDENTITY & PARTICIPATION	39	Percentage of museums and archives holding archival/heritage collections meeting UK accreditation standards.	Percentage of museums and archives holding archival/heritage collections that have been assessed as meeting the standard of the UK museum accreditation or the UK archives accreditation. Definitions: https://gweddiill.gov.wales/topics/culture-tourism-sport/museums-archives-libraries/archives/accreditation/?skip=1&lang=en https://gweddiill.gov.wales/topics/culture-tourism-sport/museums-archives-libraries/museums/accreditation/?skip=1&lang=en
c - IDENTITY & PARTICIPATION	40	Percentage of designated historic environment assets that in stable or improved conditions.	Percentage of scheduled monuments in Wales that are in stable or improving condition or listed buildings that are neither 'vulnerable' nor 'at risk'
a - PRODUCTIVITY	41	Emissions of greenhouse gases within Wales.	Territorial emissions of greenhouse gases by sector (Million tonnes carbon dioxide equivalent MtCO ₂ e), where territorial emissions are the emissions released directly within Wales. It includes international shipping and aviation but does not include emissions associated with the production of goods and services outside of Wales even if they are imported into Wales. Equally emissions associated with the production of

			goods and services in Wales are counted as Welsh emissions even if these are exported for consumption elsewhere.
a - PRODUCTIVITY	42	Emissions of greenhouse gases attributed to the consumption of global goods and services in Wales.	Emissions of greenhouse gases, whether in Wales or elsewhere, that may reasonably be attributed to the consumption and use of goods and services in Wales during the period To be measured initially through the extent of terrestrial semi-natural habitat, presented as losses and gains of broad habitat group by area (hectares)., for example, native woodland, hay meadows, grasslands etc.
b - WELLBEING & ACCESS	43	Area of healthy ecosystems in Wales.	The term 'natural habitat' refers to habitats which are unaltered by human activities over the course of history. There are very few such habitats in Wales that are truly natural habitats. The term 'semi-natural habitat' is therefore used to describe vegetation communities that, albeit in an altered state, sustain native plants and animals. They are key components of a biodiverse natural environment that deliver a wide range of benefits or ecosystem services. Ecosystem services relate to the benefit that can be provided by the natural environment to society and economic prosperity. Work has been commissioned through the Welsh Government ERAMMP (Environment and Rural Affairs Monitoring & Modelling Programme) on developing the national indicator on Status of biological diversity in Wales. The focus of this work has been on combining annual estimates into a single indicator of change in the distribution of priority species over time. An experimental indicator has recently been developed as part of this work. <i>Water quality:</i> Percentage of surface water bodies and groundwater bodies achieving good or high overall status under the Water Framework Directive.
b - WELLBEING & ACCESS	44	Status of biological diversity in Wales.	
b - WELLBEING & ACCESS	45	Percentage of surface water bodies and groundwater bodies achieving good or high overall status.	Surface water: 'Good surface water status' is that achieved by a surface water body when both its 'ecological status' and its 'chemical status' are at least good. Ground Water 'Good groundwater status' is that achieved by a groundwater body when both its quantitative status and chemical status are good.
d - EMPOWER COMMUNITY LEADERS	46	Active global citizenship in Wales	From 2021 new questions about whether people in Wales are active global citizens will be included in the National Survey for Wales and will contribute to a revised indicator in 2022. The questions ask whether respondents have donated or raised money, volunteered or supported any activities tackling global issues such as human rights, refugees, or global environmental issues.
c - IDENTITY & PARTICIPATION	47	Percentage of people who have confidence in the justice system	To be measured using an appropriate social survey, such as the National Survey for Wales. Further details on the measure for this indicator will be added as the detail of the indicator is developed.
b - WELLBEING & ACCESS	48	Percentage of journeys by walking, cycling or public transport	To be measured initially using usual method of travel to work from the Labour Force Survey. A National Travel Survey for Wales is in development which will provide the measure for all journeys in future.
a - PRODUCTIVITY	49	Percentage of households spending 30% or more of their income on housing costs	To be measured using further analysis from the Family Resources Survey/Households Below Average Income dataset. Further details on the measure for this indicator will be added as soon as possible
b - WELLBEING & ACCESS	50	Status of digital inclusion	Currently under development, alongside the development of a minimum digital living standard. Further details on the measure for this indicator will be added as the indicator is developed.

Well-being of Future Generations (Wales) Act 2015: Post-legislative scrutiny
Views from local authority officers to support written evidence submission

Senedd Cymru | Welsh Parliament

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol | Equality and Social Justice Committee

Ymateb gan: Cyngor Abertawe | Evidence from: Swansea Council

Local Authority: Swansea Council

Submitted by: Martin Nichols – Chief Executive

This document discusses the post-legislative scrutiny of the Well-being of Future Generations (Wales) Act 2015, focusing on its implementation and effectiveness

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Questions relating to the Committee's Terms of Reference	Views
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How far has the intended objective of the Act been achieved?	The Act has made progress in ensuring decisions and actions consider the needs of future generations while improving Wales' well-being. However, more work is needed to fully integrate these principles into systems. The Welsh Government's adoption of the Act's objectives will help drive change, but cultural and behavioural shifts have been slower than expected due to resource constraints. The Act's impact was often implicit, especially during the pandemic.
Views on any action which should be taken to improve the effectiveness of the Act and its implementation, including any specific drafting issues	The Act needs to be fully embedded at the national level to avoid contradictions and ensure public bodies can navigate its requirements effectively.
Are the review and reporting requirements under the Act are being met?	Swansea Council and the Public Services Board have met all review and reporting requirements, engaging in reflective and evaluative activities, e.g. those developed by the Office of the Future Generations Commissioner such as the Ways of Working Progress Checker Section.
Views on the effectiveness of guidance made under the Act	Initial guidance was effective, but there is now a need for more specific guidance and tools as best practices emerge, e.g. Audit Wales and Local Authorities recognise the need to reflect service user experience in performance but best practice to achieve this is not yet clear.
Views on how far the Act has been legally binding and enforceable	The Act is predicated on goodwill and self-interest rather than compulsion. Although penalties could potentially expedite adoption, the Act is perceived as a learning process for public bodies, which is considered a beneficial aspect of its implementation.

<p>Views on how far the Act has represented, and will continue to represent, value for money</p>	<p>The Act facilitates long-term decision-making and sustainability, though its monetary value is challenging to quantify. Integrating its requirements into existing operations has proven to be cost-effective. The Welsh Government should contemplate establishing longer-term budgets for local government and making more efficient use of grants. The emphasis on 'Value for money' as a critical question underscores the importance of 'economic' well-being. However, the definition of that value now includes cultural, environmental, and social considerations, rather than being confined solely to economic terms and guidance on this for local government could be improved.</p>
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Senedd Cymru

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol

Ymchwiliad: Deddf Llesiant Cenedlaethau'r Dyfodol (Cymru) 2015

Ymateb gan: Cyngor Gweithredu Gwirfoddol Cymru

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Welsh Parliament

Equality and Social Justice Committee

Inquiry: Well-being of Future Generations (Wales) Act 2015

Evidence from: Wales Council for Voluntary Action





Well-being of Future Generations Act: Post- legislative scrutiny

A RESPONSE FROM WCVA

- 1) Wales Council for Voluntary Action (WCVA) is the national membership organisation for the voluntary sector in Wales. Our purpose is to enable voluntary organisations to make a bigger difference together.
- 2) We thank the Committee for the opportunity to respond to this consultation on post-legislative scrutiny of the Well-being of Future Generations Act.

INTRODUCTION

- 3) From the work of unpaid carers, through sports clubs, social prescribers, community centres and mental health groups, to advocacy organisations the voluntary sector and volunteers in Wales play a crucial role in Wales' well-being.
- 4) Therefore, for the Future Generations Act's Well-being Goals to be realised, it is vital the voluntary sector is at the centre of all.

conversations and decisions regarding the Act. It must be at the table for early and continuous dialogue on national policy-building and with public bodies about services that deliver the Act's goals. WCVA champions the Act but regrets it hasn't delivered transformational change in its first decade.

- 5) Carrying on with no substantial changes risks the Act failing in its objectives. Consideration must also be given to better enforcement to ensure the Act is properly implemented and achieving its Goals.
- 6) WCVA's engagement shows the voluntary sector feels it is still not on an equal footing with statutory bodies in discussions about the implementation of the Act. This is despite our sector's unique position which allows us to be more nimble and better able to engage with communities and individuals than public bodies. Failure to trust and value the voluntary sector means we struggle to amplify the voices of those at the grassroots level. In turn, communities who would benefit the most from realisation of the Goals of the Act lack input into decisions made in regards to its implementation. This erodes trust and undermines the intentions of the Act.
- 7) The voluntary sector has a strong relationship with the Office of the Future Generations Commissioner through WCVA's facilitation. Since the Act's launch, voluntary organisations have been eager to work with statutory partners to help achieve the Well-being Goals. We feel there is a need for systematic reform, including appropriate funding, to further this objective. We are keen to work with Welsh Government to shape its responses to the recommendations in the [Future Generations Report 2025](#).

SUMMARY OF RECOMMENDATIONS

- 8) A summary of our recommendations relating to the Act follows.
More detail is offered further on in this response.

Effectiveness of the Act

- A pivot towards preventative work is crucial in the aim of creating A Healthier Wales, as well as reducing pressure on acute services. It must be prioritised. However, the voluntary sector will require sustainable and consistent resourcing for it to play its full part in the preventative agenda.
- There is a clear need to provide a more prescriptive framework for public bodies to contribute towards A Wales of Cohesive Communities. A co-produced communities policy would be the essential first step.
- As per the recommendation of the recent report from the Future Generations Commissioner, all public bodies should put organisational volunteering strategies in place.
- While the current milestone for volunteering under the Act has been reached, efforts must now focus on maintaining and exceeding this milestone. Full implementation of the New Approach to Volunteering in Wales will be essential to supporting this goal.

Clearer guidance

- There should be clear guidance on how money earmarked for prevention is spent to ensure it is in keeping with the Goals of the Act.
- Public bodies should receive guidance to adhere to the [Code of Practice for Funding the Third Sector](#) to ensure voluntary sector partners can play their part in helping them deliver on the Goals of the Act.
- When the Act is successful and National Milestones are achieved, guidance should be issued on how to maintain the Milestones.

Strengthening, enforcement and implementation

- WCVA is broadly supportive of the 11 recommendations put forward by the Future Generations Commissioner in the [Future Generations Report 2025](#).
- The Act should be reformed to grant the Commissioner greater powers. Consideration should be given to including tools for enforcement, incentives for compliance, and clearer guidance on implementation. To that end, WCVA suggests reviewing the powers of other Commissioners in Wales to better understand how they have been applied and, in turn, whether such powers have had a positive impact.

- There is a need for greater and more formal scrutiny of partnership forums, such as PSBs and RPBs, in Wales to ensure they are working effectively. This can ensure the ambitions of the Act are delivered, and that all partners are contributing to the process on an equal footing.
- Expanding the powers of the Future Generations Commissioner to have a greater oversight of how public bodies conduct public engagements in relation to the Act would help build public trust.

A HEALTHIER WALES

- 9) Pivoting towards preventative health and care services is vital. As the recent report from the Auditor General noted: *‘The health system in particular has some way to go in applying future generations thinking across its planning and delivery. Accelerating progress under the Act starts with prioritising prevention. Without a more systematic shift towards prevention, budgets will be exhausted, and outcomes will likely be worse.’* [We strongly support this statement. Prevention creates healthier communities, helps people live longer and healthier lives, and reduces pressure on statutory services long-term.](#) However, the voluntary sector requires sustainable long-term resourcing for it to fully play its part in the prevention agenda.
- 10) Welsh Government should ensure voluntary sector involvement with the implementation of recommendation 19 of the Commissioner’s report:

‘Public bodies and PSBs should work together, along with the private and voluntary sectors, to implement the social model of health, placemaking and the Marmot principles to improve action on the wider determinants and reduce inequalities in their area’.

- 11) We welcome that Welsh Government has already committed to [‘making Wales a Marmot nation’](#) however, the voluntary sector must be engaged on how these principles are implemented for the best chance of success.
- 12) Implementation of the Marmot principles will help communities and public bodies become more aware of the external factors which influence a person’s health. This will lead to greater equity in health and care access and more consistent person-centred delivery, as required by the Social Services and Well-being (Wales) Act.
- 13) The voluntary sector has been at the forefront of community development for many years. It has an independent and unique role to play in supporting people and communities to thrive. Social prescribing has become more prominent across Wales. We believe it will play an important role in the implementation of the Marmot principles. However, as awareness of social prescribing grows, so does demand. The voluntary organisations accepting referrals often struggle with capacity and resource. Community and grassroots organisations need consistent and reliable funding to ensure the services they provide are stable and resilient.
- 14) We ask the Welsh Government to communicate to local authorities the importance of community involvement in the success of the Act,

stressing the need for genuine co-production (not just consultation) in the development of services. Co-production of services can help shift the power dynamic in favour of communities and create citizen-friendly, equitable services, as per the Marmot Principles.

- 15) The Future Generations Commissioner has spoken about aligning the Well-being Indicators of public bodies better with the Act. This would help create a more cohesive application of the Act, so would be welcomed.

A WALES OF COHESIVE COMMUNITIES

- 16) We were pleased to see that the National Milestone to increase the percentage of people who volunteer by 10% has been reached. This is a clear example of where the Act has been successfully implemented. We cannot assume that the current level of volunteering will be maintained into 2050. Efforts must now be focused on maintaining and expanding the number of people volunteering in Wales. Guidance should be issued to ensure that public bodies are aware of the need to maintain goals once they are achieved.

- 17) Evidence from the [National Survey for Wales](#) shows that there are particular groups, such as younger people and disabled people, who are less likely to be volunteers. Future efforts should focus on the full implementation of the [New Approach To Volunteering In Wales](#), which would make volunteering accessible to underrepresented groups and ensure we maintain or even exceed the 2050 target.

- 18) A lack of trust within communities has played a role in undermining the successful implementation of the Act. We support the call by the Future Generations Commission to do more to improve trust in public bodies.

- 19) We believe that the voluntary sector can play a crucial role in building trust by bridging the gap between citizens and decision-makers. Being closer to the ground and embedded in communities puts the voluntary sector in a unique position to help build this trust. However, public bodies often misunderstand what the voluntary sector does in this space.

- 20) Sector partners expressed frustration over approaches to community engagement and how they felt this undermined the implementation of the Act, a representative from a voluntary sector infrastructure body told us the voluntary sector often struggles to amplify the citizen voice due to insufficient buy-in from decision-makers in public bodies. She shared that, in her experience, public bodies have been 'disrespecting community input' and were a great distance from co-producing outcomes.

- 21) Failure to properly consult with communities can undermine trust in decision makers. This lack of trust provides space in which divisive actors are able to spread misinformation, reducing cohesion and creating volatile situations. This makes communities less cohesive and equal, undermining the Goals of the Act.

- 22) Those who deliver services and engage with citizens should always adhere to the [National Principles for Public Engagement](#), as endorsed by Welsh Government. There is insufficient evidence that the Principles are widely adhered to.
- 23) There is scope to expand the powers of the Future Generations Commissioner to have greater oversight of how public bodies conduct public engagements in relation to the Act. This will strengthen the implementation of the Act and support public bodies in meeting the Act's Goals.
- 24) There is a clear need to provide a more prescriptive framework for public bodies to contribute towards A Wales of Cohesive Communities. We believe a co-produced communities policy is the first step.

COLLABORATION AND INVOLVEMENT

- 25) Collaboration is one of the Five Ways of Working outlined under the Act and is essential for the implementation and realisation of its Goals. We are concerned about the inconsistency in engagement with the voluntary sector. Voluntary organisations enjoy strong working links with public bodies in some parts of Wales, but this is not the case everywhere. We fear this is undermining the implementation of the Act. For the Act to be a success, more needs to be done to foster consistent partnership working across Wales. Reform to the powers of the Commissioner and the Act in this area should focus on the sharing of best practice, strengthening the role

of the voluntary sector, and ensuring consistent buy-in from all partners to the ambitions of the Act.

26) We are also told that in some forums, such as Regional Partnership Boards (RPBs) and Public Services Boards (PSBs), partner organisations were not fully committed to the collaborative process that is expected by the Act. Jess Bickerton, CEO of the Pembrokeshire Association of Voluntary Services (PAVS), reflected that some public bodies attending PSB meetings do not fully engage in the discussions within the PSB. [She pointed to the annual report of the Pembrokeshire PSB, which highlighted these concerns](#). The failure of some partners to contribute in forums such as PSBs can be a barrier to the successful implementation of the Act. This may reflect a lack of understanding of what is required under the Act by public bodies.

27) There is scope to look at where the Act is working more effectively and share best practice across Wales. There is a need for greater, formal scrutiny of partnership forums in Wales to ensure they are working effectively. This will help strengthen the enforcement of the Act. In turn, the ambitions of the Act will be understood and all partners should be contributing to the process on an equal footing.

FINANCE AND STABILITY

28) As noted in [our response](#) to the 2020 consultation on barriers to successful implementation of the Act, we advocate for the development of funding streams dedicated to specific Well-being Goals (selected with consultation and engagement). We believe this would provide a focal point for partners to work towards. It would

also act as a catalyst for developing more formal partnerships across sectors to realise those Goals.

29) Sector partners told us about the impact of short-term funding on the ability to meet the Goals of the Act. Jess Bickerton, CEO of PAVS, highlighted how short-term funding had undermined the potential long-term preventive impact of several pieces of work. She stated that *'there is no scope to either continue or replicate the work'*. The short-term nature of many funding streams often prevents service providers from making decisions now which are designed to produce benefits in the longer term. This is the antithesis of the Goals of the Act and plays a major role in undermining its successful implementation.

30) When public bodies and other funders consider the resourcing of the voluntary sector, they must adhere to the recently updated [Code of Practice for Funding the Third Sector](#) to help ensure these services are truly sustainable. Short-term funding arrangements create instability for voluntary organisations, their staff and their volunteers, contributing to staff leaving their roles and services being forced to close. Sticking to the Code of Practice can help prevent this.

31) Challenges have also been cited around the funding of prevention-focused activities and how this is not in-keeping with the principles of the Act. Heidi Bennet, CEO of BAVO (Bridgend Association of Voluntary Organisations), pointed to issues she had encountered with ring-fenced prevention-based funding: *'20% of the RIF is intended to be ringfenced for voluntary sector providers. However,*

there is a concern that ringfenced amounts are sometimes interpreted as a maximum rather than a minimum level of funding.' She went on to add that it was not always clear how effectively ring-fenced funding was used for preventive activities. It is for these reasons that while we are supportive of the Future Generations Commissioners' recommendation for ring-fenced preventive funding, it must come with clear guidelines and oversight to ensure the funding has the appropriate preventive impact.

A MORE EQUAL WALES

- 32) There are currently no links between the LGBTQ+ Action Plan and the Future Generations Act, which can only be detrimental to several Well-being Goals, including, but not limited to, A Healthier Wales, A Wales of Cohesive Communities and A More Equal Wales. The connections between these two pieces of work must more tangible to ensure that the LGBTQ+ Action Plan can, as it states, *'support all LGBTQ+ people in Wales to live their fullest life: to be healthy, happy and feel safe'*. Some work to update the Action Plan and reform the Act in this area would be prudent.
- 33) However, we are pleased that the Mental Health Strategy makes direct links to the Future Generations Act, including noting which performance measures in the Strategy are also the Future Generations Act's National Indicators.
- 34) We are concerned to see that the levels of loneliness in Wales remain high. We feel particular attention must be paid to the finding

that someone who is [Black, Asian, or part of a Minority Ethnic group is twice as likely to have experienced loneliness as someone who is White](#). This undermines both the ambition for A Healthier Wales, A More Equal Wales and A Wales of Cohesive Communities.

35) Engagement with the sector shows it feels there is a lack of accountability in relation to the Act. There are currently no consequences for bodies that do not take the needs of future generations into account during their decision-making. As mentioned in a previous paragraph, consideration should be given to enabling the Commissioner enforcement powers, in consultation with bodies captured under the Act.

36) There are several areas in which the Act's guidance could be strengthened to ensure greater clarity of purpose:

- There needs to be clear guidance about how it links to other areas of policy and legislation – e.g. the health and care work undertaken by Regional Partnership Boards (RPBs).
- There is a clear framework around the Seven Well-being Goals, but these do not seem to be incorporated into wider planning effectively. Further guidance on implementation of the framework may prove useful to service providers.
- The guidance should include information on how public bodies can make communities more aware of the Act, and how public bodies can be challenged to adhere to it.

CONCLUSION

- 37) In sum, WCVA remains strongly supportive of the Act, its ambition and its potential to positively influence outcomes for future generations across a wide range of indicators.
- 38) We recognise, however, that the Act has not delivered transformational change on the scale originally intended
- 39) To capture that potential – and in recognising some of the fundamental challenges in its first 10-years – there is a need to strengthen elements of the Act through consideration of a range expanded powers, enforcement and meaningful implementation; a review of the powers of other Commissioners would be useful in this respect to understand how they have been applied and their impact
- 40) Without strategic reform, the Act risks further challenges in the perception of both its effectiveness and relevance in public policy-making
- 41) Notwithstanding the constructive challenge and areas for consideration cited in this response, WCVA and voluntary sector bodies across Wales remain committed to working in partnership with the Future Generations Commissioner to enable the Act to reach its full potential

42) WCVA would welcome an opportunity to discuss these matters further with Members of the Senedd or officials on request.

David Cook

WCVA Health and Social Care Project Officer



Shaun Bendle

WCVA Policy and Insights Officer



June 2025

Senedd Cymru

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol

Ymchwiliad: Deddf Llesiant Cenedlaethau'r Dyfodol (Cymru) 2015

Ymateb gan: Mudiad Meithrin

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Welsh Parliament

Equality and Social Justice Committee

Inquiry: Well-being of Future Generations (Wales) Act 2015

Evidence from: Mudiad Meithrin





Equality and Social Justice Committee

Consultation: Well-being of Future Generations (Wales) Act 2015: Post legislative scrutiny

Contact Name: Angharad Morgan

Role: Policy Manager

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Mudiad Meithrin's background

Mudiad Meithrin is a national voluntary association of Meithrin groups, Ti a Fi groups, wrap-around care and Welsh language day nurseries. Our aim is to create new Welsh speakers, campaign for Welsh-language care and education for all children, support our members and plan strategically to develop new services.

We have grown a great deal since 1971. Today, there are around 1,000 Meithrin groups, Ti a Fi groups, 'Cymraeg for Kids' groups, 'Clwb Cwtsh' sessions and nurseries under the Mudiad Meithrin banner providing early years experiences for around 22,000 children every week. Our aim overall and through the 'Set Up and Succeed' scheme is to increase the number of settings that provide childcare services, nursery education and wraparound care for young children and to expand services in existing settings (to avoid replacing historical and longstanding Welsh provision).

We have seen over 4,500 individuals qualify directly into our Welsh-medium workforce with childcare qualifications, through our National Training Scheme and the Cam wrth Gam Schools Scheme. The Mudiad is a centre with Agored Cymru, WJEC and City and Guilds accreditation and recognition, as well as CACHE, for the provision of the full range of post 14 and post-16 Child Care, Play, Learning and Development qualifications as well

as providing Level 5 Child Care, Play, Learning and Development courses in Leadership and Management. The Mudiad has direct claim status for a number of these courses following particularly high external quality checks.

We also work very closely with parents to provide help and advice to enable them to develop and support the work of the groups in the home, to pass on the Welsh language to their children or to start learning Welsh. We are a registered charity employing over 200 people nationally, with an additional 2,000 working in the groups and nurseries, and around 1500 volunteering as part of management committees. The groups are supported by a national network of professional staff who advise on a range of issues, such as business support, qualifications and staff recruitment, promoting good practice, staff training and working with local authorities.

Mudiad Meithrin's response

1. *A Wales of vibrant culture and thriving Welsh language* is one of the 7 national well-being goals, with the number of people who can speak Welsh being one of the national indicators - and identified as a key milestone. Whilst also considering the 'Cymraeg 2050' strategy, we maintain that preserving the Welsh language in our communities should be one of the strategic goals and a central principle of any new plans that are recommended.
2. In order to realise the Welsh Government's objectives, it is necessary to show how important the Welsh language is to daily life, why its restoration is vital and exciting for everyone, and why speaking and taking ownership of the Welsh language is beneficial to all individuals and communities.
3. It must be ensured that linguistic planning within and for our Welsh-speaking communities takes place in an integrated, holistic, interconnected manner, so that all aspects reinforce each other.

4. The results of the 2021 Census highlighted the need for purposeful action to increase the numbers able to speak Welsh across Wales, and that the education system and the early years care and education sector have an integral role to play in moving towards this goal.
5. While we recognise the important role of Welsh-medium statutory education to the viability of Welsh-medium communities, we note the importance of collaboration with Mudiad Meithrin and other Cwlwm organisations in order to plan to ensure provision of early years care and education through the medium of Welsh, within easy reach of all communities in Wales, to realise the aim of creating and increasing demand for statutory Welsh-medium education in all our communities.
6. The Commission for Welsh-speaking Communities' analysis of the 2021 Census raises concerns that this subconscious trend in terms of inter-national transfer is no longer completely common, even in the areas with the highest density of Welsh speakers.
7. In the 2021 census, a fall was seen in the transmission rate of the Welsh language among couple households where one adult could speak Welsh, from 45.4% in 2011 to 40.4% in 2021. Rates of transmission of the Welsh language in the home in couple households where only one partner speaks Welsh were higher when the woman was the Welsh speaker. However, the percentage of these families passing on the Welsh language in the household was less than 50%. The transmission rates for single parent households (male or female) are the same (53%).
8. It should also be taken into account that some studies indicate that the mother's language is the best predictor of the child's linguistic development. The (last) census data supports this, and shows that the probability within mixed-language families of passing Welsh on to the next generation is 10% higher in families where the mother speaks Welsh. Specific interventions need to be considered to work with fathers who can speak Welsh in mixed-language families.

9. Paying more attention to the impact and significance of gender through all actions would be beneficial. It must also be taken into account that in families where both parents speak Welsh, 20% of these, for whatever reason, decide to not speak Welsh with their children. When discussing attempts to persuade, and to influence people, appropriate targeting is crucial, and this requires taking gender, age, ethnic background, and religion into account.
10. The recent report of the Commission for Welsh-speaking Communities¹ (July 2024) notes that without the support of the education system, only in a few communities could children from households where Welsh is not spoken acquire the language
11. Education and care are policy areas that have the ability not only to protect and promote communities' current Welsh networks but also to create new Welsh speakers, work that is vitally important in order to maintain and strengthen Welsh-speaking communities of the future. To this end, the children who have not yet started school are essential from the point of view of socialising use of the Welsh language. There is potential to provide more Welsh social activities to nurture, develop and maintain the habit of speaking Welsh with the youngest children, and to support the use of Welsh within the social networks of parents, grandparents and carers.
12. The main aim of the Cymraeg for Kids programme is to increase the number of children in Welsh-medium education and care. The programme's objectives are supporting parents, parents-to-be and other family members to introduce and use Welsh in the home, passing Welsh on to their children, and supporting children's linguistic development, both socially and educationally. This is done through a diverse programme of baby groups, including baby massage, baby yoga, story sessions, signing and song, and Me and My Baby sessions, which are specifically for parents in the pre-natal period.
13. Cymraeg for Kids groups play a key role by supporting parents to speak Welsh and choose Welsh language education, and also support the health and well-being of

new parents. The groups are suitable for families from the pre-natal period up to when the child is around 18 months old. Afterwards, families are encouraged to attend the local Ti a Fi group, then on to the Meithrin group and then Welsh language education. So the language journey is clear to the parents from the very beginning.

14. Mudiad Meithrin supports a network of Ti a Fi Groups, with some led by volunteer leaders, and others by employed Ti a Fi Officers. These groups offer a weekly opportunity for families to come together in their local community to share experiences, build relationships and develop emotional and practical support networks. They offer safe places to meet, strengthen community links and reduce the feeling of isolation that is so often felt by families with young children. All of this while also introducing and encouraging use of Welsh in the community.
15. Financial cuts affect us all, and we see local authorities having to prioritise statutory services within their current budgets. This has led to a reduction in the funding available to employ specialist officers to work with Ti a Fi groups. In order to continue offering these valuable local experiences, long-term investment is needed to secure a paid organiser for Ti a Fi groups.
16. We see the current cuts also affecting the provision of the Croesi'r Bont language immersion program (which offers an immersion framework for early years settings across Wales bridging with the schools that feed the Cylch) and its relevant schemes (Camfa and Clebran) which immerse practitioners to be able to work in Welsh, as well as raising the linguistic confidence of Welsh speakers who work in the early years.
17. Recruiting individuals to volunteer as members of the cylch's Voluntary Management Committee can be challenging due to the pressure on the individuals as employers of the cylch's staff as well as other regulatory requirements. We are working with a group of volunteers from voluntary management committees to start the work of revising these models. It must be noted that a change from a voluntary

management model will mean additional costs for each location, and therefore require more financial investment in the early years.

18. A lack of awareness of where the Welsh language is used is an obstacle for Welsh speakers and learners. It is suggested that promoting the ability to communicate in Welsh, as well as the fact that its use is welcomed, is a way of solving this obstacle.
19. Lack of time is a major obstacle for individuals who are interested in learning Welsh, so introducing Welsh lessons in the workplace as part of a professional learning plan would be very beneficial to increase wider use of the Welsh language in communities.
20. We note the need to increase the number of people who can work through the medium of Welsh in a number of areas and specialist services that are part of the life of young families, including midwives, health visitors and various other professionals. It must also be ensured that language awareness training is a core element of the professional development of employees across the sectors involved in young families' lives, in order to ensure that the messages conveyed regarding the benefits of bilingualism and multilingualism are accurate and consistent.
21. There is a need to keep working with experts in the area of nudge theory and behavioural change, learning from the work that has already been carried out in the field of health, as a means of increasing goodwill towards the Welsh language and further normalising its use. There is a need to develop a better understanding of the things that influence the attitudes and linguistic choices of individuals. Professor Bernadette O'Rourke's recent work in mapping language use within multilingual cities provides an objective way of mapping the language use of multilingual citizens in their daily lives.
22. Over the course of this Senedd term, there will be a need to reopen or expand 50+ of the Meithrin groups (as well as Ti a Fi groups, in areas where they do not already exist), continuing to support all of the Meithrin groups to remain open as important

- community resources. We also note the need for significant capital funds to pay for extensions and modifications, as finding suitable locations will be challenging.
23. There are a number of historically successful schemes that could be reintroduced, subject to some minor updates. We refer specifically here to schemes such as *'Kids Soak it Up'*, *'Mae dy Gymraeg di'n Grêt'* and *Cymraeg o'r Crud*. The provision and implementation of these schemes (along with the necessary financial investment) would once again support and increase Welsh language transmission and the use of the language within families and the wider community. These schemes also offer a means of discussing the benefits of the Welsh language, bilingualism and multilingualism in a general context and in the context of Welsh education, in particular, with the families who attend the sessions.
24. To this end, Mudiad Meithrin is calling on the Welsh Government to expand its activity in the area of language transmission by supporting parents and extended family members through various programmes and groups, such as Ti a Fi groups, 'Cymraeg for Kids', 'Clwb Cwtsh' and 'Cymraeg yn y Cartref'. Activities that will only be possible if an additional budget is given for extending and increasing the services already provided.
25. We are setting three priority areas in our manifesto for the 2026 Welsh General Election: (i) Ensuring quality care and early education provision with fair funding; (ii) Raising confidence, knowledge and skills within the early years workforce, the volunteer body and parents/carers; (iii) Planning childcare and early education provision that supports the objectives of the Welsh Language and Education Bill and contribute towards creating one million Welsh speakers by 2050.
26. We need to develop and invest in plans that support communities to work together in the long term, rather than on 'task-and-finish' projects only. We need to build and support communities to invest time to develop clubs and community initiatives for the benefit of their communities. Meithrin groups and Ti a Fi groups are examples of community assets that are necessary to enable communities to flourish, offering



opportunities for children and their families to come together and build natural support networks in their square mile, and do so in Welsh.

Senedd Cymru

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol

Ymchwiliad: Deddf Llesiant Cenedlaethau'r Dyfodol (Cymru) 2015

Ymateb gan: Cyswllt Amgylchedd Cymru

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Welsh Parliament

Equality and Social Justice Committee

Inquiry: Well-being of Future Generations (Wales) Act 2015

Evidence from: Wales Environment Link



Post Legislative Scrutiny: Well-being of Future Generations Act 2015 20 June 2025

Wales Environment Link is a network of environmental NGOs. We welcome this post-legislative scrutiny inquiry, and we note that unfortunately many of WEL's member organisations who would have liked also to respond individually have not been able to do so due to capacity being taken up by supporting legislative scrutiny and policy development in priority areas for the environment.

Our focus for this inquiry response is the success of the Well-being of Future Generations Act in progressing environmental sustainability – particularly pertinent to Goals 1, 2 and 7 of the Act.

How far is the intended objective of the Act being achieved, and how could it be improved?

The assessment of progress within the Future Generations Report 2025, and the report from Wales Audit Office shows a mixed picture in terms of the success of the Act. We note that the drivers of environmental improvement, such as decarbonisation and recycling are primarily driven by specific pieces of legislation working under the framework of the Well-being of Future Generations Act. Some of this legislation pre-dates the WFG Act so it is difficult to attribute the level of further progress that the Act itself has driven.

However, a lack of progress is notable in relation to biodiversity, as addressed by the resilient Wales goal. Wales is one of the most nature-depleted countries in the world, with one in six species at risk of national extinction. Wales is also ranked 224th out of 240 countries in the Biodiversity Intactness Index, making us one of the worst in the world for the biodiversity we've lost. Whilst Wales has seen some local successes in terms of nature protection and restoration, the broad picture is one of continued decline. The budget analysis on page 112 of the Future Generations Report shows in stark terms why this is the case. The analysis suggests that this goal will only be

positively affected by 7.4% of the budget and the Climate and Nature Mission of Cymru Can will only be positively affected by 8.4% of the latest budget. A striking 50.4% of the budget is deemed by the Future Generations Office to negatively impact progress on climate and nature. The Senedd declaration of the nature emergency in 2021, and subsequent commitment to new legislation to enshrine statutory targets for biodiversity – which is only now being delivered through the Environment (Principles, Governance and Biodiversity Targets) Bill currently before the Senedd – recognised the need for new, specific biodiversity legislation to drive better mainstreaming and more, urgent action for nature.

The social and economy-oriented goals are favoured by the current government in terms of their budget prioritisation, and we would argue that that has consistently been the case since the Act's inception. The principles of the Act encourage a joined up approach and cross-sector thinking and a lack of focus on the environment-based indicators, in particular in relation to nature and ecosystems, neglect to recognise the multiple positive impacts that these indicators have on the other social and economic indicators, in particular in relation to mental and physical health, volunteering and satisfaction of communities where people live. Arguably, focus and investment on the environmental areas are perhaps the most effective and easiest ways to address some of these over-lapping goals. Yet, what we have seen in recent years is a decline in investment in these areas by public bodies.

We know from the Future Generations Report that public bodies don't feel they can prioritise nature in the way that they can with decarbonisation work, because there are no statutory nature targets in place yet. We see evidence of this in the reduction of ecologists within local authorities: as budgets have been reduced over the last decade, nature-related expertise has been amongst the first to be axed. Expertise from the third sector in this area is also not present on the majority of public service boards and this is a significant area where the third sector (across all of the well-being goals) could be of significant support if adequately resourced and engaged effectively.

Our sector campaigned tirelessly for the Well-being of Future Generations Act to be brought into being, because we hoped that it would drive sustainable decision-making at a strategic level and drive investment to improve the health of our

environment and our ecosystems. This is an area where, despite the support of the Future Generations Commissioner, the Act has failed. However, we think that it can still drive progress if improvements are made and we would recommend the following key areas for improvement.

Ringfence preventative budgets and invest more in nature's recovery

Ringfencing preventative budgets is a recommendation from both the Future Generations Commissioner and the Wales Audit Office. This is particularly important for work on climate and nature: we believe the fact that the Welsh Government has not historically taken a preventative approach is a key reason why 50% of the current budget is perceived as having a potentially negative impact on the climate and nature. As noted above, statutory biodiversity targets will play a much-needed role in driving and supporting the mainstreaming we need to see if actions by government and others are to work for, rather than against, nature.

There is extensive evidence of the importance of a healthy natural environment in underpinning society and the economy (e.g. the Dasgupta Review), and indeed the Resilient Wales Goal and the Environment (Wales) Act are based on a recognition of this. However, there is also extensive evidence of systemic under-investment in nature. [WEL's Pathways to 2030 report](#) sets out some key actions for nature's recovery and the resources required to deliver them, identifying a shortfall of £438m per year, as well as the need for re-purposing of existing spending to be more nature positive under the new Sustainable Farming Scheme. Investing in nature will help prevent problems from getting worse, given nature's vital role in supporting climate change mitigation and adaptation and its many services and benefits to health and well-being.

Strengthen the powers of the Future Generations Commissioner

Provide the Future Generations Commissioner stronger powers to drive compliance with the Act. Currently the Commissioner can provide advice and can use their Section 20 powers to undertake a review. If necessary, the Commissioner can publicly criticise a public body where there is lack of progress, but they have no power to ensure compliance. For example, the Future Generations Report notes that

only 68% of Public Service Boards have developed well-being objectives and/or steps in relation to nature. It makes no comment on the effectiveness of these. In an acknowledged nature emergency this is not acceptable, but the Future Generations Commissioner has no available sanctions for this. Whilst advice and guidance was important in the first few years of the Act, while public bodies were getting used to their new duties, this must now change to ensure progress on all Goals equally, as the Act intended.

Take forward the FGC's recommendation to streamline and better resource public partnerships

There are a lot of processes and meetings that drain the capacity of public bodies to deliver action on the ground. These partnerships are important to provide the opportunity for a systems approach to problem solving and service delivery. Policy-makers repeatedly point out the potential time and financial savings from working in this way. What is rarely acknowledged is that to get such partnerships working effectively also takes time and budget. PSBs have been asked to operate without dedicated resources, assuming that cash-strapped public bodies will provide funding from their own budgets, and that they will have staff capacity to attend meetings and take forward action between meetings. Whilst there have been some successes, not all PSBs are working effectively, particularly in relation to delivery of nature and climate objectives. NRW is expected to be the key partner on the environment for all 13 PSBs, but we know that NRW is seriously under-resourced, so it is questionable whether they can effectively guide PSB objectives on nature.

Better guidance, training and direction to enable public bodies to comply with the five ways of working

The five ways of working have been an important part of the WFG Act and the emphasis on collaboration and involvement have resulted in some instances of helpful engagement with public bodies and the Welsh Government. For example, the First Minister's River Summits have been an attempt to bring all relevant stakeholders together to tackle the problem of water pollution. The Future Generations Commissioner has been particularly helpful in advising on how these

collaborative meetings can be improved so that they deliver implementable solutions in the future.

More generally, public bodies seem supportive of the ways of working, but they are not using them consistently across all areas. Effective involvement can produce excellent results, but it is time consuming (as recognised by Wales Audit Office), so the decreasing resources that public bodies have had over the last 10 years may have hindered their ability to embed this properly.

The Future Generations Report has also identified the need for better community involvement and use of participative democracy structures, such as citizens' assemblies, to ensure that communities are on board with the transition to a more sustainable future. Better guidance and training on how to use the five ways of working effectively, with specific guidance on citizen involvement mechanisms, could help public bodies to embed the five ways of working. However, they also need sufficient resources to do this properly.

Better Integration of Food and Diets Policy into the Act

Several WEL members also work with the Food Policy Alliance. WEL members working in this area support the submission by Food Policy Alliance providing recommendations on how to better integrate food and diets policy into the Act. Access to healthy, sustainable food is important to delivery of the Act, but this policy area has not been articulated clearly enough within the definitions of the well-being goals, resulting in it being largely excluded from public bodies' well-being objectives.

Improvements to monitoring

In relation to the monitoring of the progress against the national indicators, it is our understanding that the National Survey for Wales is no longer being continued. This leaves a potential vacuum in some of the perception-based monitoring which brings into question how some of these indicators will be measured in the future. National Indicators will also need to be reviewed in light of proposed nature targets and include robust monitoring and data collection requirements as well as significant expansion of related nature-based targets in regard to Air and Water quality which

are currently inefficient. Again, engagement with the third sector in relation to data expertise and collection can support this, but without robust data and requirements for the monitoring of the indicators against the goals, it will be impossible to demonstrate progress and impact, whether nationally or locally.

How effective is the guidance under the Act?

Delivering effectively under the Act is complex, particularly in an increasingly difficult economic environment. Welsh Government guidance under the Act focuses on what the Act says and the duties on public bodies, such as setting well-being objectives and reporting. It does not provide detailed advice on how public bodies should manage conflicts between delivering benefits under all of the Well-being Goals equally, or how to balance short-term requirements against long-term needs and benefits. The Wales Audit Office report gives examples of the sorts of conflicts and decisions that public bodies are struggling with, such as the difficulty of planning preventatively when rising costs and demand for services is placing immediate pressures on decision makers.

The Future Generations Commissioner can give more detailed advice to public bodies, but the Commissioner's Office is a relatively small team given the wide range of its remit. It has to pick priority areas to focus its capacity on. Perhaps there is a role for more Welsh Government guidance and training for leaders of public bodies on managing the inevitable trade-offs that will impact their ability to deliver their well-being objectives effectively. However, it is important to note that the Wales Audit Office has identified that the Welsh Government is also struggling with the same issues.

How far has the Act has been legally binding and enforceable; and how far the Act has represented, and will continue to represent, value for money?

The Act has driven a change in the way that public bodies think about sustainable development, and in the way that they engage with stakeholders to an extent. This has been important and has raised the profile of sustainability in Wales. However, WEL is not aware of any legal challenges or enforcement proceedings that have been

allowed under the Act directly, and we note it has been described as '[useless](#)' for the purpose of challenging public bodies on decisions and plans.

We would emphasise that, in relation to the environment (as in other areas), the enforcement of specific requirements sits outside of the Act and depends on other, specific legislation which the Act can never (and does not aim to) replace (e.g. the Conservation of Habitats and Species Regulations 2017 or the Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021). However, since the UK left the EU there has been a critical gap in the governance and oversight of the implementation of environmental law by public bodies. This gap is to be addressed through the Environment (Principles, Governance and Biodiversity Targets) Bill that is currently before the Senedd, which will create a new Office of Environmental Governance Wales for this specific purpose. This is, rightly, a very distinct role from that of the FG Commissioner, and an essential one to help to ensure progress towards a healthier natural environment.

Policy decisions, such as those relating to roads in Wales (e.g. rejection of the M4 Relief Road) have been taken by Ministers with the sustainable development principle in mind, and the Act has provided policy makers with justification for a change of direction away from business as usual in some cases. This is important, but we'd like to see the Act drive more fundamental change towards making Wales more environmentally sustainable.

The Office of the Future Generations Commissioner has become an important voice for future generations and has been a strong voice for the importance of the environment, and for the need to take action on climate change and nature loss. While public bodies have still not fully embedded the Act, particularly in relation to the importance of nature and resilient ecosystems, without the FG Commissioner role in place it is likely that fewer public bodies would be considering their impact on nature. Our members consider that the FGC Office does provide value for money and their role must continue to be supported, and to be strengthened. Without a strong Commissioner driving public bodies to design services and solutions that meet the needs of future generations, it is difficult to see how this will happen. Wales can't afford to stop transitioning towards a more sustainable society because the cost of

inaction on climate change¹ and nature loss² alone, far outweigh the costs of delivering the Act. Whilst cost impacts for the UK are more easily available, a report from WWF Cymru showed that the Welsh ruminant livestock sector suffered £175m in losses from climate change impacts in 2018 alone.³

When introduced, the Wellbeing and Future Generations Act was a world-first and was celebrated by many as a significant step in the right direction towards creating a more sustainable and resilient Wales. A decade on, we have seen some successes, and the Office of the Future Generations Commissioner is an important voice in Wales but this needs to be significantly strengthened if we are to manifest the original intentions of the Act to deliver the Wales that we want.

¹ <https://lordslibrary.parliament.uk/government-climate-policy-economic-impact/#heading-4>

² <https://hive.greenfinanceinstitute.com/gfihive/insight/assessing-the-materiality-of-nature-related-financial-risks-for-the-uk/>

³ https://www.wwf.org.uk/sites/default/files/2024-03/5126%20-%20FARMING%20IN%20WALES_REPORT_v3.pdf

Wales Environment Link (WEL) is a network of environmental, countryside and heritage Non-Governmental Organisations in Wales. WEL is a respected intermediary body connecting the government and the environmental NGO sector. Our vision is a thriving Welsh environment for future generations.

This paper represents the consensus view of a group of WEL members working in this specialist area. Members may also produce information individually in order to raise more detailed issues that are important to their particular organisation.



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Senedd Cymru | Welsh Parliament

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol | Equality and Social Justice Committee

Ymateb gan: Plant Yng Nghymru | Evidence from: Children In Wales

To - Senedd Equality and Social Justice Committee

Submitted by Children in Wales-Plant Yng Nghymru

Well-being of Future Generations (Wales) Act 2015: Post-legislative scrutiny

Introduction

We welcome the opportunity to contribute comments to inform the Equality and Social Justice Committees inquiry on post-legislative scrutiny of the Well-being of Future Generations (Wales) Act 2015 (thereafter 'Act').

We note that the Committee is keen to build on the existing body of literature regarding the operation of the Act rather than duplicate, with the terms of reference specifying the areas for our consideration.

Our response is focused on the effectiveness of particular priorities set out in relevant sections of the Act and within supporting statutory guidance as they impact on babies, children, young people and their families. To inform our response, we have drawn upon our existing knowledge and experience since the Act gained Royal Assent, complimented by information recently received from our members through a bespoke survey.

General Comments

The introduction of the Act elevated Wales on to the global stage, providing a legislative framework by which public bodies and their partners could shape change around the Well-being goals for children, adults and communities, both now and for future generations. At Children in Wales, we share the national mission and vision of the Act and that which it is trying to achieve in contributing towards delivering better outcomes for babies, children and young people as part of a whole population approach. Despite the lack of explicit reference and consideration given to the often-distinct well-being needs of babies, children and young people, statutory guidance does serve to remind decision makers that the Five Ways of Working supports existing commitments through the United Nations Convention on the Rights of the Child (UNCRC).¹

In any future review of the statutory guidance to support implementation of the Act, we would wish to see a more explicit and considered recognition of the rights and needs of babies, children and young people, recognising their unique attributes, characteristics and differing needs, including those who can benefit from additional help, support, advice and information. Greater prioritisation would better reflect the first of the seven identified foundations of the then proposed Act, that 'children need to be given the best start in life from the very early years'²

Prevention

The focus on prevention within the Act is still to be welcomed and has served to drive greater prominence within future policy and legislation³, for example through the Social Services and Well-Being (Wales) Act and more recently the 10-year Mental Health and Well-being Strategy. However, as demand for services has increased and needs have escalated, there is a growing need to ensure that preventative and early intervention programmes and services which provide an essential support mechanism and a safety net for babies, children, young people and families are fully protected from adverse short-term budgetary decisions. Investment and extension of preventative support services and programmes for families can make a crucial difference to children's lives and alleviate the need for

¹ The Children's Commissioner for Wales published a helpful toolkit which reinforces how the Act upholds the spirit of the UNCRC to support public bodies to embed The Right Way Approach [CCFW-FGCW-Report-English_01.pdf](#)

² [The-Wales-We-Want-Report-English-Final.pdf](#)

³ The focus in the Act on the Welsh Language, environment and Culture was also recognised by many members responding to our survey

more costly and lengthy support and intervention at a later stage. For example, research has shown that cutbacks to preventative services for children from 12 years old has a direct correlation with numbers of 16–17-year-olds coming into care.

With a rising demand for support, invariably resource and focus has shifted towards responding to people in crisis rather than providing the means to address issues much earlier in a person’s journey or indeed preventing issues emerging in the first place. Our recent publication ‘State of the Parenting and Family Support Sector 2025’⁴ reported services being stretched well beyond their original remit, with a workforce increasingly responding to more complex caseloads. Evidence continues to show that early intervention and prevention, particularly in the first 1000 days of a child's life, can have a transformative impact on long-term outcomes for children and families. Yet as the Future Generations Commissioner rightly points out, prevention budgets are being cut, and without investment, public services will not be there for children⁵. Pressure to meet short term needs and respond to immediate crises has also been highlighted in the Audit Wales report into the Act.⁶

Long Term

Many members responding to our survey stressed the challenges facing children’s third sector organisations in not being able to fully plan and focus on solutions for long term challenges and goals due to the short-term nature of current funding arrangements⁷. This despite the valuable role children’s third sector organisations play in supporting public bodies to deliver their priorities and enable the Welsh Governments overarching goals to be met. One-year funding cycles put immense pressure and stress on staff and makes it challenging for organisations to commit to long-term planning.

There is an urgent need to review budget processes and allocations, with a view to securing longer term and sustainable levels of funding for the children’s third sector to enable them to fully contribute to delivering the

⁴ [Children in Wales | State of the Parenting and Family Support Sector in Wales 2025 – A sector under strain but full of resolve](#)

⁵ [Future Generations Report 2025 - Future Generations Wales](#)

⁶ [No time to lose: Lessons from our work under the Well-being of Future Generations Act](#)

⁷ For example, the need for longer term funding was raised by our member Clybiau Plant Cymru

vision of the Act and to achieve better and lasting outcomes for babies, children, young people and their families

Tackling Poverty

The Act made consequential amendments to Part 1 of the Children and Families (Wales) Measure 2010 enabling public bodies to discharge the duty to tackle child poverty through the introduction of local Well-being Plans. This was intended to provide for a more holistic, citizen focused approach to the planning and delivery of public services in Wales, by public bodies setting out local objectives to improve the social and economic wellbeing of individuals and communities, including babies, children and young people.

Many of our members shared concerns at the time of the Acts introduction that the rationalisation of the planning and reporting process would not bring about an improved focus on tackling child poverty locally within a wider remit. Previously there was a statutory duty on local authorities and public bodies to produce a bespoke Child Poverty Strategy, setting out the actions they would take towards contributing to the shared objective of eradicating child poverty in Wales. This duty is no longer in place as previously prescribed through the Children and Families (Wales) Measure 2010⁸.

Whilst all Well-being Plans developed through regional multi-agency Public Service Boards outline steps to address child poverty in their locality, many lack the necessary detail as to the specific actions they will take; are unclear how impact will be measured or progress reported or outline the necessary timetable for completion and the resources allocated. Our second report⁹ into child poverty and Well-being Plans published in 2025, provides a snapshot of the actions being taken to meet the statutory duty, as well as highlighting noticeable gaps in information and a lack of indicators and performance measures in many regions by which to monitor, measure and report progress to their communities.

A greater urgency is needed to address rising levels of local and regional child poverty¹⁰ and widening economic inequalities in every part of Wales. We would wish to see existing duties strengthened through any future

⁸ The duty remains on Welsh Government.

⁹ [Children in Wales | Reports & Publications](#)

¹⁰ Recent local level data shows that over a quarter of all children live in poverty in 21 of the 22 local authority areas in Wales [Local Child Poverty Statistics - End Child Poverty](#)

review of the statutory guidance for public service boards. This should include robust periodic reporting requirements (as is already in place for the Welsh Government) alongside performance management systems and monitoring and scrutiny arrangements. Whilst local determination should be protected, we would suggest a more prescriptive approach is reintroduced which would be in keeping with the 13 Broad Aims for contributing to the eradication of child poverty previously set out to guide public bodies and outlined in Part 1, Section 1 of the Children and Families (Wales) Measure 2010¹¹

Participation

The Act also made amendments to Part 2, Section 12 of the Children and Families (Wales) Measure 2010 which required local authorities to make arrangements to promote and facilitate the participation of children in decisions which might affect them¹². The scope of their participation is wider than their involvement in the Well-Being Plan, with the expectation that they adopt the Children and Young People's National Participation Standards for Wales and embed participation throughout their structures¹³. Local authorities are expected to establish and resource a Youth Council or Forum, whilst other public bodies should ensure that opportunities are in place for children and young people's involvement in decision making processes which supports their overall well-being (Section 5 of the Act).

The Welsh Government are required to monitor local arrangements for children and young people's participation under the Act. The Committee will be interested to learn how the participation duty is currently being applied in all regions of Wales and whether there is a need to strengthen existing Guidance and oversight arrangements to ensure that children and young people's participation is fully embedded into all aspects of planning, delivering and reviewing of services as the Act intends. As has been reported elsewhere, children and young people remain underrepresented in decision making processes¹⁴

Play

¹¹ [Children and Families \(Wales\) Measure 2010](#)

¹² Statutory Guidance on children and young people's participation for Public Service Boards – Annex B - [SPSF 3: Collective role \(public services boards\)](#)

¹³ [Children and young people's national participation standards | GOV.WALES](#)

¹⁴ [Future Generations Report 2025 - Future Generations Wales](#)

The need for enhanced guidance for public bodies to help identify and deliver wellbeing goals for children has been made by our member organisation Play Wales¹⁵ in their response to our survey. As well as advocating for a named play champion on public services boards, they have called for play and the existing Play Sufficiency duty to be incorporated into revised guidance, referencing the Ministerial Review of Play report recommendations to widen the scope of the statutory duty.

National Well-being Indicators

Whilst we have welcomed the National indicators and informed their development through responding to a number of consultation opportunities since the Act came into force, we recognise their limitations and overreliance on their use to monitor policy delivery despite notable gaps¹⁶. We have previously suggested that a roadmap towards the targets is developed and which includes interim milestones to help track progress, and to allow for any necessary adjustments and changes to be made, particularly as new data becomes available. The lack of disaggregate data, including by age and protected characteristic, hampers resources being better targeted where action is most needed. Introducing milestones towards the targets and improving the availability of data would allow for better reporting on how the Act is delivering positive change and improved outcomes for the population.

June 2025

About

Children in Wales is the national umbrella organisation in Wales for children and young people's issues, bringing organisations and individuals from all disciplines and sectors together. One of our core aims is to make the **United Nations Convention on the Rights of the Child (UNCRC)** a reality in Wales. Children in Wales campaigns for sustainable quality services for all children and young people, with special attention for children in need and works to ensure children and young people have a voice in issues that affect them.

¹⁵ Please see Play Wales submission to the Committee's inquiry

¹⁶ For example, the Monitoring Framework as one tool by which to measure implementation of the Welsh Government's Child Poverty Strategy was informed by the National Well-being Indicators [Child Poverty Strategy Monitoring Framework](#)

Children in Wales works closely with its member organisations and has an established and recognised number of national professional forums and networks. This provides an opportunity for a broad range of our members to share knowledge and expertise on particular thematic priorities, with a view to maximizing capacity and impact across the sector and to coproduce agreed positions in relation to policy and legislation.

Children in Wales also manages and facilitates the **Young Wales** programme of work through funding from Welsh Government. This initiative provides an opportunity for a broad range of children and young people to be involved in national decisions which will have an impact on their lives. It also provides a key role and function in respect of supporting participation activity and adherence to the National Standards for Children and Young People's Participation at a local level

For further information on the work of **Children in Wales**, please see www.childreninwales.org.uk.

Food Policy Alliance Cymru (FPAC) Response to the ESJ Inquiry into post-legislative scrutiny of the Well-being of Future Generations Act.

Post-legislative scrutiny of the Well-being of Future Generations Act (WFG Act) must consider how food and diets can be integrated into the legislation.

Wales cannot achieve the well-being goals of the WFG Act without action on improving access to healthy and sustainable diets for all current and future generations.

Despite the importance of food to well-being, the food system and diets are missing from the definitions of Wales' well-being goals. As a result, food is largely missing from the well-being objectives which public bodies are required to set under the legislation, this results in the lack of integration of the food system and diets in policymaking at local and national level.

We welcome the Future Generations Commissioner's focus on food in his Cymru Can strategy, the Future Generations Report 2025 and his office's ongoing support for public bodies to take action on food and diets – and the positive influence the Commissioner has had on Welsh Government's Food Matters and Community Food Strategy.

The case for food and diets to be integrated into the WFG Act

In 2020 the [Welsh Food System Fit For Future Generations](#) report outlined how food and diets are critical to each of Wales' well-being goals and found that Wales urgently needs to create an integrated, sustainable and just food system fit for future generations.

The Food (Wales) Bill narrowly failed to progress to Stage 2 in the Senedd in 2023. The bill proposed the development of a national food strategy for Wales and food duties for public bodies in order to create a more sustainable and coherent approach to food policy in Wales. [Legal advice](#) commissioned by Food Policy Alliance Cymru for the bill found that the WFG Act *'does not come close to providing an adequate legislative framework for improving food policy in Wales and none of the well-being goals and indicators contain any meaningful engagement with food'*.

[The Future Generations Report 2025](#), produced by the Future Generations Commissioner for Wales (FGC) recommends the integration of food and diets into the WFG Act due to the:

- 1) Importance of food and diets to the progress of each of Wales' well-being goals: food systems are the greatest driver of biodiversity loss and a significant contributor to climate change, while the social and economic [cost](#) of obesity to Wales is set to rise to £2.4 billion by 2050.

- 2) Growing risks to Wales' food resilience from global insecurity and climate change – risks which pose challenges for current and future generations' ability to access healthy and sustainable diets.

The Wales Net Zero 2035 Challenge Group on [Food Security](#) has outlined how progress towards Wales' net zero commitments must include actions to improve the sustainability of the food system. Recommendations from the group include the integration of food into the WFG Act.

Food is largely missing from the well-being objectives which public bodies are required by the WFG Act to set, and work towards. [Research](#) in 2023 commissioned by Food Sense Wales and the FGC found that only eight local authorities and only two health boards have integrated food into their well-being plans. The research found that the lack of a national food resilience plan and the omission of food and diets from the WFG Act contributes to this gap.

Since its creation, the WFG Act has shaped all new legislation and Welsh Government policy frameworks. For Wales to address the complex challenges of public health, land use, planning and the climate and nature emergencies – a WFG Act that requires the integration of food and diets in policy-making will support the public sector to develop the holistic approaches required for Wales to achieve the vision of the WFG Act.

The Social Partnership & Public Procurement Act in 2023 amended the definition of the Prosperous Wales goal to include 'fair work', this has supported the Welsh Government's efforts to embed fair work approaches across the public sector. A similar approach could be taken to integrating food and diets into the WFG Act.

Since the creation of the WFG Act, food has risen up the political and public policy agenda in Wales and across the UK.

The UK Government is currently drafting a UK Food Strategy, and the Scottish Parliament passed the Good Food Act in 2022 which places a duty on Scottish Government and public bodies in Scotland to produce good food plans. The Welsh Government has published Food Matters (an outline of its current food related programmes) and the Community Food Strategy. These are important developments however Wales currently has no overarching long-term national food resilience plan and food is missing from the WFG Act.

Wales requires a comprehensive national food resilience plan to enable local and regional actors to deliver actions to improve access to healthy and sustainable diets for all. Amending the WFG Act to include food will not be sufficient in addressing Wales' food challenges, however it will support the integration of food within the duties of the WFG Act and would complement future developments around a comprehensive approach to food governance in Wales.

Signed by the following members of Food Policy Alliance Cymru (FPAC)

Katie Palmer, Food Sense Wales

Jon Parker, Food Farming & Countryside Commission

Gary Mitchell, Social Farms & Gardens

Shea Buckland-Jones, WWF Cymru

Ian Rappel, Landworkers Alliance Cymru

Andrew Tuddenham, Soil Association Cymru

Prof Angelina Sanderson Bellamy, University of the West of England (UWE)

Senedd Cymru

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol

Ymchwiliad: Deddf Llesiant Cenedlaethau'r Dyfodol (Cymru) 2015

Ymateb gan: Chwaraeon Cymru

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Welsh Parliament

Equality and Social Justice Committee

Inquiry: Well-being of Future Generations (Wales) Act 2015

Evidence from: Sports Wales



ESJ Committee Consultation – Sport Wales Response

**Senedd Equality and Social
Justice Committee inquiry.**

**Scrutiny of the Wellbeing of
Future Generations (Wales)
Act 2015**

1. Sport Wales' Response

Background:

Sport Wales is the national organisation responsible for developing and promoting sport and physical activity in Wales at both community and elite levels. We are financed by annual funding from the Welsh Government and from the National Lottery. We are the main adviser on sporting matters to the Welsh Government and are responsible for distributing Government and National Lottery funding to sport in Wales.

Sport Wales is one of the smallest public bodies in Wales and our budget is comprised of running costs, grant funding for National Governing Bodies, national partners and local authorities to deliver sport, but also community sport – investing and growing local opportunities for clubs and societies to serve the needs of their local communities.

We are one of the 56 public bodies in Wales which are subject to the Wellbeing of Future Generations (Wales) Act; we meet our duties under the Welsh Language Standards and care deeply about our place in Welsh society and culture. We work closely with the Older People's and Children's Commissioners and filter all our work through the lens of equality, diversity and inclusion.

We strive to be the best we can be and give the best we can offer to all people along the sporting pathway, from children starting out, to medal-winning athletes, to a diverse career path in the sporting sector, to older people staying fit, healthy and independent.

Overview

Sport Wales wants to enable sport in Wales to thrive so that everyone can be active and have a lifelong enjoyment of sport. As a publicly funded body we have a responsibility to understand the needs and circumstances of everyone who wants to take part in sport, regardless of their circumstances.

We want sport to be diverse and inclusive so that everyone can feel confident and enjoy all the benefits that sport offers.

As a public body we are bound by public duties, which means that we must consider and demonstrate how we can contribute to a more equal, fairer, sustainable and prosperous Wales that is fit for future generations.

As well as having a duty towards those who take part in sport, our responsibilities extend to how we employ and look after our staff.

This response whilst wide ranging will touch on the key terms of reference of the inquiry:

- how far the intended objective of the Act is being achieved

- any action which should be taken to improve the effectiveness of the Act and its implementation, including any specific drafting issues.
- whether the review and reporting requirements under the Act are being met.
- the effectiveness of guidance made under the Act.
- how far the Act has been legally binding and enforceable; and
- how far the Act has represented, and will continue to represent, value for money.

Sport Wales and the Future Generations Act 2015 background:

The [Well-being of Future Generations Act](#) requires public bodies in Wales to think about the long-term impact of their decisions, to work better with people, communities and each other, and to prevent persistent problems such as poverty, health inequalities and climate change.

The Act sets out 7 national goals. Public bodies are required to show how they will contribute to the goals through clear objectives. Sport Wales's strategic intents have been developed to also act as our Well-being objectives.

Sport Wales believes that everyone in public life should be required to get behind the communication of improving the wellbeing of the people of Wales, and there needs to be clear, consistent and simple messages to communicate the Act to the public and beyond.

As an organisation we are fully committed to the Act and are ambitious to work with and support work which will positively benefit future generations, working with other public bodies to collaborate effectively, and ensuring that we are not duplicating work.

We set our Wellbeing Objectives as part of our refreshed strategy and the national conversation on sport and physical activity in 2018/19. The Strategic Intent statements are the core of our strategy, they were written to fulfil the dual role as our Well-being Objectives and Strategic Intent statements and every year in our integrated annual report we assess whether or not they are still relevant.

The intention of this process was to ensure the objectives become part of our DNA; a part of everything we do. In the development of our strategy and vision we used the Act to ensure that we use Wellbeing Objectives throughout high-level decision making such as in our Board Papers.

At Sport Wales, we would like to lead by example, and we are practically exploring how to react effectively to the unexpected and still deliver positive outcomes. Part of this

means shifting to an approach which uses narrative and reflection to learn from our experiences and using insight and evidence to understand the context under which events have taken place. We consider ourselves an insight-led organisation. We believe that there is much value in sharing our learning and working with others to embed this approach.

The Future Generations Act provides the framework in which we can work with innovative approaches to change and long-term sustainability. The Commissioner recommends the use of different frameworks which encourage us to think about what is no longer sustainable and what can be harnessed to deliver solutions for the future. Through our approach to investment, we have adopted a long-term method to prevent inequalities from getting worse, as well as tackling them, and we are working with the sport sector to upskill them and modelling long-term change.

How we practically use the Act:

When it comes to financial and investments decisions, Sport Wales ensures that the act is always central to its decision making. Whilst there are obvious challenges for the sector over the last few years, we have always strived to fully implement the Future Generations Act in our budget, planning and investment decisions.

Investment Decisions

In response to the introduction of a new strategy Sport Wales developed a new investment model. This model was fundamentally driven by the principles of the Future Generations Act. The model specifically utilises the principles of involvement, prevention and the long-term.

The new investment model uses data from a range of sources, primarily from the National Survey for Wales and the School Sport Survey. Data around what sporting activities the Welsh public, and predominantly children and young people, are doing, and wish to do, now drive the way our investment is focused. The sports most relevant to the public are given the greatest levels of funding and any which are not yet able to receive public money due to underdeveloped governance structures, we work with to put in place the necessary requirements to bring them up to 'capability'. This was an active choice to reflect the principles of collaboration and co-creation within the Act, putting the voice and desires of the Welsh public at the heart of the financial distribution of the organisation

Additionally, recognising the Act's focus on involvement and collaboration, the investment model also weights this data by specific demographics by race, gender, disability and deprivation. Again, this focus was driven by the approach of utilising a future generations approach to enhance decision making that ensures Sport Wales funding is being aligned to what children and young people, across a range of underrepresented demographics, wish to see.

Full details on the Sport Wales investment model can be found [here](#).

Financial Planning:

We have noted some of the key areas we have worked on during our budget planning process below, which relates to the 7 wellbeing goals and the ways of working:

- **A globally responsible Wales**

Sport Wales funds the Institute of Sport via dedicated lottery funding. This supports elite athletes, including those competing at an international level. Building on previous success, the Sport Wales capital programme will also include an allocation to support sporting facilities with energy saving measures, which will deliver carbon reductions and financial cost savings.

- **A Wales of vibrant culture and thriving Welsh language**

Sport Wales directs funding to partners and communities to deliver the Vision for Sport in Wales. Funding is aimed at encouraging participation at all levels and maximising the experience for participants.

- **A more equal Wales**

Sport Wales partners include organisations working with particular groups, including those with protected characteristics, such as the Urdd, Street Games, the Black Swimming Association. Together with the other home nations' Sports Councils, we funded the International Working Group (IWG) on Women in Sport to hold the Secretariat in the UK for 2022-26. We are keen to improve women's ability to participate in sport.

These partnerships are aimed at encouraging inclusivity and diversity of participation. This new investment model was implemented in 2023-24 with a phased approach. The inclusion of positive weightings for disability, race, gender, and deprivation in the allocation criteria means that individuals with these protected characteristics are positively impacted by this model.

Whilst the overall budget passed onto partner organisations has reduced in the past due to cuts, the principles and integrity of the investment model have been maintained. Consequently, the desired outcome will continue to drive the investment, albeit at a slower pace due to the budget reduction.

- **A prosperous Wales**

Sport Wales continues to be a major employer of staff and provides training opportunities for staff throughout the organisation. Sport Wales is also committed to maximising apprenticeship opportunities, currently employing two digital apprentices and a master's student within the Institute. In addition our recent '[Social Return on Investment](#)' report and the previously published [Economic Value Report](#) shows how sport continues to contribute to a prosperous Wales

- **A resilient Wales**

Sport Wales will continue to progress with the [environmental sustainability plan](#) driving actions to embed sustainability and biodiversity in all that we do and to support the wider sports sector to make progress in response to the climate and nature emergencies.

- **A healthier Wales**

Sport Wales' budgets will contribute to the overall Vision for Sport in Wales and maximise opportunities to provide everyone with a lifelong enjoyment of sport, enhancing physical and mental wellbeing.

- **A Wales of cohesive communities**

Sport Wales distributes significant funding to communities to enable sport and participation to thrive at a local level and will continue to do so in 2025/26

How does our financial planning link into the ways of working?

- **Long Term**

Whilst budgets are invariably shorter term in nature, the aspirations of what Sport Wales is seeking to achieve through its funding is for the long term. Some priorities are expected to have a more immediate impact, but resources are utilised to deliver sustainable sport services for the future. This is factored into investment decisions for both capital and revenue.

Whilst the upturn in the 2025/26 budget was welcome, the 2024/25 budget reduction inevitably slowed progress to deliver the Vision for Sport in Wales. In effect, this was a short-term decision that compromised the longer-term ambition. Sport Wales had to mitigate the immediate impact on partners by passing on a moderate budget reduction of 3.5%, but work was still required during 2024/25 to support the ongoing financial resilience of the sector. This was also included as a project of significance in the Sport Wales 2024-25 Business Plan.

- **Collaboration**

Significant collaboration will continue with partners working together to achieve the Vision for Sport in Wales. Effective relationship management mechanisms are already in place to understand shared priorities with equality, diversity and inclusion at the heart of these discussions and actions. Sport Wales also collaborates with other sectors on shared areas of interest, such as Healthy Weight Healthy Wales, education and environmental sustainability. Dedicated budget and (human) resource will also be available for these areas.

- **Involvement**

Significant involvement from and engagement with communities on accessing funding and via dedicated projects. Sport Wales will always ensure that, as an organisation, we are led by need and there are a multitude of opportunities for people with lived experience to feed into our work.

- **Prevention**

Sport has a significant role to play in the prevention agenda as physical activity contributes to improved health and wellbeing outcomes. Sport Wales continues to build relationships with other bodies, notably Public Health Wales, to support the

delivery of a longer-term preventative health agenda. Supporting a Healthier Wales is also a business plan priority for Sport Wales.

Integration

Good integration with other public bodies around areas of common interest such as health, education and environmental sustainability. The business plan will enhance the advocacy role, and dedicated resource is in place for this. The acceleration of Sport Partnerships will enhance the level of integration at a regional level based on population need.

We would like to reflect on the fact that our investment approach, is specifically driven by a Future Generation approach. Sport Wales has adopted a new investment formula which ensures that the funding we distribute through our partner network is informed by data.

We actively use the voice of the people of Wales in taking decisions as to who is funded, to what extent and to what purpose. The funding model utilises data from the School Sport Survey, specifically funding sporting opportunities that children and young people are doing and wish to do. Furthermore, we weight this funding by gender, ethnicity, deprivation, and disability ensuring it supports those most in need. We also use data from the National Survey for Wales, the census and Welsh Index of Multiple deprivation, as well as other sources. Full details on the model can be found [here](#).

We passionately believe in an approach that allows future generations to have a role in determining how our investments are made, involving their voice in the process and creating a collaborative approach to the sustainability of sporting offers in Wales. Regardless of the challenges we face this principle will remain at the heart of our decision making.

Accountability:

As part of the work to produce our Annual Report we conduct a review cycle with a number of key staff. This considered the progress we have made in the previous year towards our well-being objectives and it also considers if the current objectives should remain unchanged. Sport Wales has also recently used the Commissioner's Way of Working Checker to fulfil the same role for the 5 Ways of Working in the act. Both processes have been useful tools to consider work across the organisation to help celebrate and share progress and to think about how we can go further and what that will require. We are currently working to increase the engagement in these processes across the whole workforce.

Sport Wales has also benefitted from contact with the Commissioner and his staff. Previous contact to ask for information or advice and feedback has been very beneficial, especially where staff have been new to roles or projects are novel or complex. The opportunity to contact the Commissioner team in future would be valued. Support and guidance around new and more complex partnerships of public bodies and also with organisations from the commercial or voluntary sector could also

be an important role that could have significant impact in partnerships being able to thrive more quickly or avoid a crisis and failure.

How do our partners implement the act?

Alongside our role as a public body implementing the act, we also spoke with a number of our partners within the sector in order to explore their thoughts on the act's progression over the last 10 years.

We explored how different partners approached the act and ensured it was central to their work. During the consultation period we spoke to a selection of National Governing Bodies, National Partners and Sport Partnerships. We believe for the act to achieve its main outcomes that it's crucial our partners are taken with us on the journey.

Whilst all partners had examples of positive work which directly aligned with the act, it was also important to note that there was some debate about the progress over the last 10 years.

Key themes emerging from these discussions are touched on below:

Partners Feedback:

Here at Sport Wales, we work collaboratively with our National Partners to help us transform Wales into an Active Nation. A nation where everyone (and we mean everyone) can reap the lifelong benefits and find enjoyment from participating in Sport.

Our National Partners are vital to the Sport Wales strategy. Working across the length and breadth of the country, their extensive networks make it easier to gain a wider reach into communities. They play an integral role in helping us remove barriers and thus making sport more inclusive so everyone can enjoy the benefits.

We spoke to some of our partners to see how they engage with act – these are some of the themes that emerged from conversations:

1. The Value and Relevance of the Act

All partners strongly supported the continued need for the Act, citing its uniqueness in legally mandating long-term thinking and sustainable planning.

Wales was recognized as a leader in future-focused legislation, standing out across the UK. Several partners noted how the act validates their work.

The Act validates and reinforces our work. It gives us a shared language and purpose to bring partners together around prevention, inclusion, and long-term wellbeing.

Despite general support, there was a recurring concern about slow progress and limited visibility of impact over the past decade.

2. Practical Use and Strategic Alignment

Several organisations, reported aligning their internal strategies with the Act and the benefits of doing this.

One partner noted that the act had underpinned strategic work which had led to a number of positive outcomes, noting how far the Act has represented, and will continue to represent, value for money.

'There have been a lot of wins for us, strategy wise it's helped us greatly...we have seen a big win with our residential camps where some of the strategy work has seen us starting to use solar panels, which in turn has paid for all of the guest's use of electricity. It's a big win for us and we have numerous examples where the act has underpinned some of our positive outcomes'

Indeed, several partners agreed that being able to use the act when developing their own strategies led to strategic alignment with government priorities.

'We worked on drafting our strategy and then we cross referenced it against the future generations act in terms of the well-being goals and ways of working. We wanted to align and identify if what we were proposing to do as an organisation was consistent with what government wanted us to be thinking in terms of the direction as well. It's helped with alignment'

Whilst many praised the act's practical use, many also noted they do not actively report against the Act or measure outcomes in a systematic way which led to further discussions around accountability.

3. Accountability and Evidence of Impact

Some partners questioned the lack of structured evaluation and visibility, citing the absence of clear evidence showing how organisations benefit from or contribute to the Act.

There was a shared sentiment that organisations might be working to the Act but are not being held accountable for measurable outcomes. There was a wider discussion on the role Sport Wales could play here – but also a feeling that this should fall on to the commissioner's office. On the point of accountability, one partner noted:

Whilst some organisations are mandated to collaborate and report on sustainability, the current systems can be vague and inconsistent, leading to tokenistic partnerships rather than genuine collaboration.

4. Reporting Challenges

Partners also highlighted vague or tokenistic reporting mechanisms, such as checkboxes or open-ended sustainability questions that do not promote deep reflection or improvement.

There was a call for better standardization in reporting and clearer expectations from government bodies.

5. Role of the Commissioner and Government

Many participants suggested that the Commissioner's Office needs more authority and resources to enforce the Act and support organisations more effectively.

Several speakers noted that support from government is inconsistent and often leaves organisations uncertain about expectations.

It was agreed that the role of the commissioner would benefit from additional levers and resources. But it was also important to note that some partners felt it wasn't just additional finances that were the issue:

More money is not necessarily what is needed. I think you can keep throwing more money at the FG office and not necessarily see the benefits. I think there are some things that certainly need refining. Take PSB'S (Public Service Boards) for example...are the right people from the right sectors in the room? Is it just another talking shop? I would argue it needs changing'

6. Collaboration and Sector Responsibility

Collaboration is often mandated, but in practice, it can become tokenistic or superficial.

True collaboration should be meaningful, with shared goals and joint accountability across sectors. It was thought that within the sports sector the development of sport partnerships could be seen as an opportunity for consistent collaboration, consistent responsibility and an opportunity to really emphasize the benefits and positive use of the act.

Sport Partnerships

Background:

Sport Partnerships are aiming to be a game changer for future generations, transforming the way community sport is created, delivered, led, and funded. Designed to overcome ongoing and stubborn inequalities in participation in sport and physical activity, these partnerships will help transform Wales into an active nation where everyone can have a lifelong enjoyment of sport and are intricately linked to the Act. The creation of the sport partnerships undoubtedly reflects the Act's core values.

We spoke to two of our sport partnerships – both at different stages of their journeys - to understand how much they engage with the act:

Actif North Wales

Actif North Wales is the regional partnership for physical activity and Sport, working across the six North Wales local authority areas. Their aim is clear: to ensure that everyone has the opportunity to be active in a way that works for them.

They successfully work with communities, local authorities, the health board, housing providers, the voluntary sector, and others to understand the real-life challenges people face—particularly in rural, deprived, and isolated areas. By listening and working in partnership, they work to help support communities to shape their own local solutions, creating more inclusive, accessible opportunities to be active and reducing the inequalities that prevent people from moving more.

The Well-being of Future Generations (Wales) Act 2015 is central to Actif North Wales' strategy and ways of working. As explained by their CEO

‘We don’t treat it as a ‘compliance exercise’, but rather we see it as part of our culture, values, and long-term approach here in North Wales.’

Actif North Wales have explicitly built their 10-year regional strategy (2023–2033) around the five ways of working set out in the Act as can be seen below:

- **Long-Term:**

They are investing in system change across a 10-year horizon, focusing on sustainable, long-term shifts in how people engage with physical activity, sport and movement — particularly for those facing poverty, disability, inequality or exclusion.

- **Prevention:**

Actif North Wales move beyond just offering / delivering activities/opportunities. We work alongside communities to understand the barriers they face to being active, such as cost, transport, confidence, or lack of inclusive spaces, so we can come together as a system to support them where they are.

For example, in some areas we’ve introduced wraparound services (e.g., chiropody and audiology) to help people feel ready and able to join in with local opportunities to be active.

- **Integration:**

They align with wider public health, poverty, climate and community development agendas. Our work connects to outcomes in Healthy Weight, Healthy Wales, the Vision for Sport in Wales, and local Public Service Board’s Well-being Plans.

- **Collaboration:**

They lead a regional coalition of partners across sectors and departments/teams within local government, focused on joint decision-making and collective delivery. Our current test and learn projects include joint initiatives with the health board, education, local authorities, National Governing Bodies of Sport, social housing associations, National Partners, equality groups and community groups.

- **Involvement:**

At the heart of their approach is **Asset-Based Community Development**—putting local people in control – giving them the ‘power’.

For example, they support communities to co-create solutions through local “discovery walks”, ripple-effect mapping, and participatory engagement and planning.

The Act has helped us move beyond the traditional view of “sport for sport’s sake” towards a broader understanding of how physical activity and movement contribute to wider social outcomes—such as better health, stronger communities, reduced loneliness, and improved wellbeing.

This shift is changing how local, regional, and national partners view and support physical activity. We’re now seeing real examples of engagement from organisations that previously didn’t see themselves as having a role in this space.

Actif North Wales emphasised how the act has enabled them to shift from a short-term, activity-focused model to a whole systems-place based approach that focuses on the root causes of inequality and highlighted how the five ways of working offer a clear, values-based framework that has helped shape our organisational culture and partnerships.

However, challenges remain. Whilst highlighting the many positives of the act, Actif North Wales admits that as with everything that have been challenges whilst implementing the act, which includes:

- **An Inconsistency in application:**

Not all sectors interpret or embed the Act with equal rigour. This can slow progress, create inconsistencies across the region and risks duplication of effort/funding.

- **Limited enforceability:**

Without statutory accountability or dedicated investment aligned to the Act’s ambitions, some public bodies/and many funders still focus on short-term outputs rather than the more complex, and often ‘messy’, long term, preventative, co-produced approaches.

- **Evaluation difficulties:**

The tools they are using (e.g. ripple effect mapping, asset mapping, stories of change) are aligned with the Act’s principles, but aren’t always recognised in traditional performance reporting frameworks. There’s a tension between measuring what matters and what’s easy to count.

- **Relationship-building at a local level:**

Our recent SPF-funded pilot projects (that we are now scaling up across the region) has demonstrated the common goal we have with other system partners e.g. housing, countryside services, community development teams. Being community led, and focusing on those that need our support the most we have seen that communities will engage—deeply and creatively—when they are involved in designing the solution. Trust has grown, although this cannot be sped up, as has local ownership.

West Wales Sports Partnership:

The West Wales Sports Partnership (WWSP) was established in 2023. In 2024 Jamie Rewbridge was appointed as CEO and Kate Williams as Head of Strategic Partnerships and Development. As such they are in a different position to Actif North Wales who have operated for a longer period of time.

As pointed out by the CEO, even though the partnership is relatively new, the Act has already shown clear value:

The WBFGA has already shaped our organisational direction and continues to influence our work... The Act has been a guiding principle in the formation of our organisation—shaping our articles, purpose, and governance. It is central to the development of our first regional strategy and informs our collaborative, system-wide approach. This approach, which has gained traction post-2015, aligns with the Act's emphasis on long-term thinking and integrated working. We're seeing its influence grow, not just within our organisation, but across the wider sector.

Whilst noting that the Act itself is visionary and comprehensive. WWSP echoed some views of our other partners noting that challenges can arise in its interpretation and implementation. That its broad scope has the capacity to be overwhelming, particularly for larger public bodies like local authorities, making it difficult to monitor progress across all goals. They also noted how they believe that public service boards are an area for review, and that they can often result in a lot of conversations but little action.

Public Services Boards (PSBs) are a key area for review... Are they too broad in scope? Are they operating at the right level to drive change? A clearer mandate, better support, and more focused objectives could enhance their impact. Scrutiny of their current performance and future role would be a valuable starting point for improvement.

As with other partners they agreed that the Commissioner's work is invaluable but that there might be a need for greater resources and leverage within the office.

The Commissioner plays a vital role in championing the Act and supporting its implementation. To be truly effective, the role needs adequate resources and authority to influence policy, guide delivery, and ensure accountability. The focus should be on driving innovation and added value—not just endorsing existing work.

Summary

Since the implementation of the Future Generations Act in 2015 it is clear that it has had positive impact across the sector. Many of our partners are actively engaged, see the many benefits of implementing the act and are proud to be leading the field in the UK. People undoubtedly support the act but the message coming through is that there is more to do.

Whilst the benefits and intentions of the act are well received, there are questions that emerge, how do we make organisations more accountable? Should the commissioner be granted more powers? Has the pace of delivery been enough over the last 10 years?

From our own experience and talking to our partners, it seems clear that the scale and pace of the delivery of the Act depends on individual organisations understanding the requirements set by the Act, buying into delivering it and how they lead together with others. Where work is committed to in partnership, clear areas of collaborative work and outputs must be agreed upon by each public body, and some ownership must be taken to ensure the work does not halt unnecessarily. Tensions could also arise

between those who are more minded towards a traditional KPI approach and the different ways of working that the Future Generations Act encourages.

As well as accountability being stronger, with organisations being clear on what they have pledged to do and with clear transparency as to what has been achieved, a culture change is needed where organisations are encouraged to try new ways of doing things. The culture needs to allow staff to innovate without fear in case something new is not guaranteed to succeed and provide an environment of trust and safety to enable staff to learn from these experiences. Not every piece of work or programme can have a successful outcome, but being agile and willing to take calculated risks, will encourage an atmosphere which is more conducive to delivery of the Act.

We are aware that future trends are a priority area for the Commissioner. Using future trends work to try to understand what policy changes future generations will require is a helpful way to map services. We have written two reports in the last decade aiming to delve into trends around sport and physical activity and what future generations need to improve activity rates and access to sport. [The Vision for Sport in Wales](#) and [our Strategy](#) were also developed using these concepts. Working across sectors to develop our understanding of health and population trends within the sport space, has wider applications for other sectors.

In creating our strategy, we ensured that our Wellbeing Objectives and our Strategic Intentions were one and the same. As a result, our whole approach to delivering the Sport Wales strategy is committed towards the Wellbeing Objectives we have set. This approach, which was supported by the Commissioner's office during the design and consultation stage, has helped embed the Act in our day-to-day operations, and others may find this useful to consider how the two can be aligned.

It is clear that a public body's ability to meet its duties under the Act is down to everyone within the organisation. As we mentioned previously, procurement is a key element of sustainability; HR policies to alleviate poverty or ingrained inequalities; the ability for partners across organisations to work collaboratively for a healthier Wales, all of these and more are imperative in successfully enacted legislation. A nominated person in public bodies could be responsible for it, as there must be for the Strategic Equality Duty and the Welsh Language Standards, yet there is more that could be done to help all employees of a body understand how they can be a part of the Act's implementation.

In some of the public bodies subject to the Act, there are nearly 2,000 employees. How every one of those employees can live and breathe the values of a sustainable future for all requires some creative thought. Linking the Act to leadership and management development within Wales, which can equip staff with the tools to better understand and implement the Act with confidence may be one way to do this.

As a public body which is firmly committed to the act, we welcome this inquiry and look forward to seeing how the future generations act continues to play an important role in Wales, enabling us to deliver for people in the here and now as well as striving to improve the lives of future generations. We look forward to seeing how this inquiry develops.

The Act is unique to Wales and positions us as a global leader in sustainable development. It should serve as the foundation for all public sector activity, ensuring

that strategies and actions are aligned with long-term well-being goals. The Future Generations approach provides a clear framework for decision-making, helping organisations stay focused, measure progress, and remain accountable—provided robust benchmarking, monitoring, and evaluation systems are in place. It puts the voice of the young person at the forefront of decision making. The approach makes collaboration an essential, when it is often viewed as a nice to have. However, to maintain its relevance, the Act must be regularly reviewed and adapted to reflect evolving societal needs.

The world has changed significantly since 2015, and the Act must evolve accordingly to remain impactful. We believe that we are going in the right direction, but momentum needs to be accelerated.

Sport Wales is a champion of the Well-being of Future Generations Act with previous ideas for practical working with the office including keeping our understanding on future trends up to date; adopting the Three Horizons Framework that the previous Commissioner used which looked to work together to upskill the sport sector in modelling long-term change; proactively harnessing the voices and expertise of Young Ambassadors and also becoming a complexity-friendly organisation. We also now produce an integrated Annual Report which features all of the work we do to meet our future generations duties and ways of working alongside our other statutory requirements such as Welsh Language and our biodiversity and sustainability reporting.

Ultimately our vision is of a Wales where everyone is active. From those who don't think of themselves as sporty to those who win gold medals, we believe that everyone can have a lifetime enjoyment of sport. We want Wales to be an active nation with as many people as possible inspired to be active through sport.

Agenda Item 4.3



Room 430
Parliament Buildings
Belfast
BT4 3XX

Our ref: CC/25/219

The Rt Hon Liz Kendall MP
Secretary of State
Department for Work and Pensions
Caxton House
Tothill Street
London
SW1H 9NA

25 June 2025

Dear Secretary of State

The Northern Ireland Assembly's Committee for Communities, the Scottish Parliament's Social Justice and Social Security Committee and the Equality and Social Justice Committee at Senedd Cymru have agreed to write jointly to you regarding changes to the incapacity and disability benefits system and the associated Pathways to Work Green Paper.

Set against an economic backdrop that is already extremely challenging for disabled people and/or people with health conditions, the anticipated changes have led to significant concerns. Those affected and other stakeholders in each of our jurisdictions fear that the challenges faced entering or returning to the workplace will only worsen in the coming months and years. For many, the benefits they receive are not symptomatic of a 'broken' system but make a significant contribution to their health and well-being and enable them to actively participate in the workplace.

The Committees are agreed that inadequate consultation and engagement by the UK Government with stakeholders and the devolved institutions has contributed to this sense of concern. Limited in-person consultation at just nine events, and only in major cities, is also restricting further the opportunity to hear from the many people who fear their ability to enter or return to the workplace will be adversely affected by the UK Government's approach to reform.

In addition, the lack of robust data and jurisdiction-specific impact assessments presents significant challenges for our three committees to effectively scrutinise potential impacts. As the elected members who make up the three committees, we are well placed to assess demographic and historical contexts and to ensure dialogue is constructive and reform is meaningful and positive. However, we remain constrained by the lack of quality information.

Our committees fully support the stated ambition that ‘no one should be consigned to a life on benefits just because they have a health condition or a disability, especially when they’re able to and want to work with the right support in place’. However, in order to contribute meaningfully to the reform process, committees and citizens must be fully informed and offered every opportunity for meaningful engagement.

The Assembly’s Committee for Communities, the Scottish Parliament’s Social Justice and Social Security Committee and the Equality and Social Justice Committee of Senedd Cymru have considered and approved the text of this letter.

Yours sincerely



Colm Gildernew MLA

Chairperson of the Committee for Communities

cc: Jenny Rathbone MS, Chair, Equality and Social Justice Committee,
Senedd Cymru

Collette Stevenson MSP, Convener, Social Justice and Social Security
Committee, Scottish Parliament