

## **Agenda – Equality and Social Justice Committee**

---

Meeting Venue:

**Committee Room 3 (Senedd)**

Meeting date: 9 December 2024

Meeting time: 13.30

For further information contact:

**Rhys Morgan**

Committee Clerk

0300 200 6565

[SeneddEquality@senedd.wales](mailto:SeneddEquality@senedd.wales)

---

**(Pre-meeting 13.00 – 13.30)**

### **Public meeting**

#### **1 Introductions, apologies, substitutions and declarations of interest**

(13.30)

#### **2 Fuel poverty in Wales: evidence session three**

(13.30 – 14.45)

(Pages 1 – 43)

Rhian Bowen–Davies, Older People’s Commissioner for Wales

Dr Sumina Azam, National Director of Policy and International Health, Public Health Wales

Dr Rebecca Hill, Senior Public Health Specialist, Public Health Wales

Ceri Cryer, Policy Advisor, Age Cymru

**(Break 14.45 – 15.00)**

#### **3 Fuel poverty in Wales: evidence session four**

(15.00 – 15.45)

(Pages 44 – 47)

Keryl Lanfear, Housing Strategy Officer, Rhondda Cynon Taf County Borough Council

David Mark Lewis, Energy and Commercial Services Manager, Gwynedd Council



Meilyr Tomos, Fuel Poverty Officer, Gwynedd Council

#### **4 Papers to note**

(15.45)

##### **4.1 Correspondence from ColegauCymru to the Finance Committee in relation to the Welsh Government Draft Budget 2025–26**

(Pages 48 – 59)

##### **4.2 Correspondence between Chair and the Cabinet Secretary for Social Justice, Trefnydd and Chief Whip and Cabinet Secretary for Education regarding the development of the British Sign Language (BSL) GCSE in Wales**

(Pages 60 – 64)

##### **4.3 Correspondence between the Chair and Councillor Andrew Morgan regarding information as part of the inquiry into the disability employment gap**

(Pages 65 – 68)

##### **4.4 Correspondence between the Chair and the Future Generations Commissioner regarding strengthening and advancing equality and Human Rights**

(Pages 69 – 73)

##### **4.5 Correspondence between the Chair and the Law Society regarding strengthening and advancing equality and Human Rights**

(Pages 74 – 77)

##### **4.6 Correspondence between the Chair and the Equality and Human Rights Commission regarding strengthening and advancing equality and Human Rights**

(Pages 78 – 85)

##### **4.7 Additional evidence from Dr Simon Lannion regarding FRESH (Foundation data for Robust Energy Strategies for Housing)**

(Pages 86 – 109)

#### **5 Motion under Standing Order 17.42(iv) to resolve to exclude the public from the remainder of this meeting**

(15.45)

## **Private meeting**

### **6 Fuel poverty in Wales: consideration of evidence**

(15.45 – 16.00)

### **7 Disability and Employment: consideration of key issues**

(16.00 – 16.45)

(Pages 110 – 136)

Document is Restricted

Cyflwynwyd yr ymateb i ymgynghoriad y [Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol](#) ar [Tlodi Tanwydd yng Nghymru](#)

This response was submitted to the [Equality and Social Justice Committee](#) consultation on [Fuel Poverty in Wales](#)

FP02

Ymateb gan: Comisiynydd Pobl Hŷn Cymru | Response from: Older People's Commissioner for Wales

---



# CONSULTATION RESPONSE



Comisiynydd  
Pobl Hŷn  
Cymru  
Older People's  
Commissioner  
for Wales

## Senedd Equality and Social Justice Committee Consultation: Fuel Poverty in Wales

The Older People's Commissioner for Wales (OPCW) welcomes the opportunity to respond to the Senedd Equality and Social Justice Committee's consultation on Fuel Poverty in Wales.

### Introduction

Fuel poverty is an issue that affects a significant number of older people across Wales. The true extent of older people affected is hard to assess due to a lack of recent data. Projections are based on 2008 Living in Wales Survey and the 2017-18 Wales Housing Conditions Survey: as of 1 October 2021, 22% of single pensioner households, and 13% of pensioner couple households in Wales were in fuel poverty.<sup>1</sup>

Older people have contacted the Commissioner to raise a range of issues connected with fuel poverty such as living in older, damp properties that are hard to heat; living off grid and relying on oil or LPG heating and also the difficulties in understanding energy bills, especially when receiving estimates. This causes considerable hardship, frustration and distress to older people who experience these problems.

The Commissioner has also heard from many older people about the impact that the UK Government's decision to restrict the Winter Fuel Allowance to only those in receipt of Pension Credit will have this winter. This decision is likely to mean the number of older people in fuel poverty and severe fuel poverty will increase, with significant harm to physical and mental health and wellbeing as a result.

The Welsh Government's Tackling Fuel Poverty Plan "Tackling fuel poverty 2021 to 2035"<sup>2</sup> was published in March 2021 to address fuel poverty in Wales and to support those "struggling to meet the cost of their domestic energy needs". The Commissioner's office responded to the consultation on the Plan, stating that the timescale for change was too broad and calling for a target to eradicate fuel poverty amongst older people by 2026. There remains a noticeable lack of interim targets in the plan. It is essential that interim targets are introduced in order to concentrate action on this issue. The context of fuel poverty has changed significantly and rapidly since the original plan was first published.

<sup>1</sup> Welsh Government (2023) Fuel poverty modelled estimates for Wales. (June 2023). Available at: <https://www.gov.wales/fuel-poverty-interactive-dashboard>

<sup>2</sup> Welsh Government Tackling fuel poverty 2021 to 2035 A plan to support people struggling to meet the cost of their domestic energy needs. Available at: <https://www.gov.wales/sites/default/files/pdf-versions/2021/12/4/1638465219/tackling-fuel-poverty-2021-2035.pdf>

## Is there an accurate picture of fuel poverty in Wales?

The consultation notes the reliance on the 2008 Living in Wales Survey and the 2017-18 Wales Housing Conditions Survey. This does not therefore provide an accurate picture of fuel poverty in Wales, as the surveys are based on data that are out of date. Many factors have affected household income and living costs since then, such as inflation, changes in employment patterns, and the impact of COVID-19 and Brexit. These factors influence fuel poverty, making any older data less relevant and reliable.

Since 2021, there has been a significant increase in energy costs and energy debt. Likewise, the UK Government's decision to restrict Winter Fuel Allowance Payments to only those older people in receipt of Pension Credit will not have been taken into account.

However, Wales has also made strides in retrofitting homes with better insulation, more efficient heating systems, and other measures that reduce energy usage. This would not be captured fully by surveys conducted several years ago.

A more accurate picture of fuel poverty in Wales is needed, especially as Wales has the oldest housing stock in the UK,<sup>3</sup> meaning many houses are poorly insulated, leading to increased energy costs and fuel poverty. Fuel poverty results in cold homes, which contributes to excess winter mortality and to a range of symptomatic illness. Older people are likely to be disproportionately affected by changes in temperature caused by colder weather. 75% of excess winter deaths are people aged 75 and above.<sup>4</sup> The average older person supported by Care and Repair (a charity that helps older people to live independently through repairs, adaptations and home maintenance) spends 19% of their income on utilities over the winter. In the winter of 2022/23, clients who engaged with Care and Repair's fuel poverty and energy advice service were spending on average 25% of their income on utilities.

Cold weather and living in a cold home can affect and exacerbate respiratory and circulatory conditions, cardiovascular disease and accidental injury.<sup>5</sup> Research also indicates a link between cold home temperatures and poorer mental health. Wales's old housing stock and poor energy efficiency leads to significant costs for NHS Wales: in 2019, Public Health Wales estimated that the impact of excess cold increases the costs to the health service associated with poor quality housing by around £41M, bringing the total to nearly £100M a year.<sup>6</sup> Going without food or not eating enough over time leads to malnutrition, which increases the risk of frailty, increasing GP visits, hospital admissions and the length of stay in hospital.<sup>7</sup>

---

<sup>3</sup> Welsh Housing Conditions Survey (headline results): April 2017 to March 2018. Available at:

<https://www.gov.wales/welsh-housing-conditions-survey-headline-results-april-2017-march-2018>

<sup>4</sup> Care and Repair (2024) Older people in Wales: Poverty in Winter. Available at: [careandrepair.org.uk/winter-report/](https://careandrepair.org.uk/winter-report/)

<sup>5</sup> Public Health England/UCL Institute of Health Equity (2014), Local action on health inequalities: Fuel poverty and cold home-related health problems, p. 4. Available at: [Briefing7\\_Fuel\\_poverty\\_health\\_inequalities.pdf](#) (publishing.service.gov.uk)

<sup>6</sup> S, Garrett H, Woodfine L, Watkins G, Woodham A. (2019). The full cost of poor housing in Wales, Building Research Establishment Ltd, Public Health Wales, Welsh Government. Available at:

[The Cost of Poor Housing report English final2-1.pdf](#) (phwwhocc.co.uk)

<sup>7</sup> UK Government (2017), Impact assessment: Helping older people maintain a healthy diet: A review of what works. Available at: [Helping older people maintain a healthy diet: A review of what works - GOV.UK](#) (www.gov.uk)

# Impact of changes to the eligibility criteria for the Winter Fuel Payment on fuel poverty in Wales

The decision to restrict Winter Fuel Allowance payments, worth up to £300 per year, to only those older people in receipt of Pension Credit will have a serious negative effect on some of the poorest older people across Wales, pushing more into fuel poverty. All those who are entitled to Pension Credit, but do not currently claim, will now also miss out on Winter Fuel Allowance. This is concerning, as it will impact thousands of older people across Wales, in a period when energy debts are rising.

Around 50,000 eligible households in Wales do not claim the Pension Credit they are entitled to, meaning that around £117 million is left unclaimed rather than reaching those who need it most.<sup>8</sup> The changes by the UK Government to eligibility for Winter Fuel Allowance will only increase the amount of entitlements left unclaimed in Wales.

Wales has proportionately more older people than other parts of the UK and so the impact of the change in eligibility criteria will be felt significantly in Wales. People over 60 make up 28.2% of the population of Wales, compared to 24.7% of England and 24.9% of the UK as a whole.<sup>9</sup> The Department for Work and Pensions estimate that 33% of eligible single older men, 33% of eligible single older women and 31% of eligible couples do not claim the Pension Credit to which they are entitled.

Pension Credit also operates on a 'cliff edge' whereby someone's income determines that they are either entitled or not entitled to support – there is no taper. This means that someone who is not eligible for Pension Credit as a result of being over the qualification threshold by even a few pence misses out on all the other support that is unlocked, which now includes Winter Fuel Allowance.

The tight timescale for the changes is also a cause for concern. The policy change was announced on 29 July with w/c 16 September 2024 used as the qualifying week for Winter Fuel Allowance payments. Although Pension Credit payments can be backdated, meaning applications by 21 December 2024 can still qualify for Winter Fuel Allowance, this is still a very tight timescale for applications to be made by eligible older people who do not currently claim. Older people will also have up to £600 less this winter compared to last year in UK Government support with their heating bills, because the cost-of-living payments brought in temporarily by the previous UK Government have now stopped.

Data from the June 2024 ONS Public opinions and social trends survey also showed that older people (70+) were more likely to say the cost of energy bills has increased (53%) than younger age groups and that they were using less gas and electricity to combat this.<sup>10</sup> The National Survey for Wales has recently reported that 25% of 65-74 year olds and 17% of those aged over 75 say they sometimes or always struggle to pay bills.<sup>11</sup>

Older people have contacted the Commissioner with concerns about the Winter Fuel Allowance change in eligibility criteria, for example: "I am upset and appalled by the announcement... that Winter Fuel payments are to be scrapped for pensioners except for those on benefits. As a

---

<sup>8</sup> Independent Age (2019) [https://www.independentage.org/sites/default/files/2019-07/Credit%20where%20its%20due%20report\\_0.pdf](https://www.independentage.org/sites/default/files/2019-07/Credit%20where%20its%20due%20report_0.pdf)

<sup>9</sup> StatsWales (2024) National level population estimates by year, age and UK country. Available at: <https://statswales.gov.wales/Catalogue/Population-and-Migration/Population/Estimates/nationallevelpopulationestimates-by-year-age-ukcountry>

<sup>10</sup> ONS (2024) <https://www.ons.gov.uk/releases/publicopinionsandsocialtrendsgreatbritainjune2024>

<sup>11</sup> Welsh Government (2023) National Survey for Wales April 2022 to March 2023 <https://gov.wales/national-survey-walesresults-viewer>

pensioner who worked all my life and saved money for my retirement, I am not entitled to any means funded benefits. However, in past years the WFP has been a lifeline in helping me to pay for even the minimum amount of heat (three hours a day at 15°). I live in a rural area and so my home is dependent upon LPG fuel which is very expensive.”

Other older people have contacted the Commissioner stating that the Winter Fuel payments have been a lifeline to pay for even the minimum amount of heat. One older person explained how she had cut out a meal a day in an attempt to be able to afford to heat her home. Individuals have also told of the impact on people who are more susceptible to the cold as a result of heart conditions and taking blood thinning medication, for example. The withdrawal of the payment at such short notice has created anxiety.

## Warm Homes Programme

The Welsh Government’s Policy Statement of June 2023 provided a useful overview of the purpose and approach of the new Warm Homes Programme.<sup>12</sup> Changes to the eligibility criteria for support with energy efficiency measures under the new scheme are welcome. The move from qualification being based on receipt of means tested benefits to a low-income threshold instead, for example, is positive. However, while the need to prioritise dwellings with an Energy Performance Certificate (EPC) rating of E and below is understandable, older people living in homes with a higher EPC rating than E may still experience ill health as a result of fuel poverty and living in cold homes. It is helpful that individuals with a recognised health condition (such as a chronic respiratory, circulatory or mental health condition) living in a household with an EPC of D will also be eligible.

Likewise, the change to allow more than one application per household, meaning that if a household supported by a previous Warm Homes scheme intervention remains in fuel poverty and meets the eligibility criteria, they may apply for additional support, is also a beneficial development.

The prioritisation of low carbon technologies where it makes sense to do so, alongside ensuring that the Warm Homes Programme has some flexibility to support the most vulnerable in society in exceptional circumstances is reasonable.

However, in practice, this flexibility does not seem to take into account the reality of much of Wales’s housing stock and the circumstances of many older people living in fuel poverty. Low carbon options can be limited for older housing stock. Such homes can be harder to retrofit and more expensive to upgrade. Warm Homes guidance no longer mentions boiler repair or replacement as an option for the free home energy efficiency improvements available.<sup>13</sup>

Given the climate emergency and the need to transition to Net Zero, the Welsh Government’s statement that ‘Long-term investment in fossil fuel heating systems will be permitted only exceptionally under the new Warm Homes Programme’ is understandable.<sup>14</sup> The example given in the Policy Statement of prioritising energy-efficient gas boilers where moving from fossil fuels to an electric heating system would cause a significant increase in running costs is pragmatic.

---

<sup>12</sup> Welsh Government (2023) New Warm Homes Programme: policy statement, [New Warm Homes Programme: policy statement \[HTML\] | GOV.WALES](#)

<sup>13</sup> See Nest Guidance: [Get free home energy efficiency improvements from Nest | GOV.WALES](#)

<sup>14</sup> Welsh Government (2023) New Warm Homes Programme: policy statement, [New Warm Homes Programme: policy statement \[HTML\] | GOV.WALES](#)

The Commissioner is therefore extremely concerned to understand that for 2024-25, even in a 'crisis' situation where a household does not have an operational heating and hot water system and an individual is eligible for support under the Warm Homes Programme, there is an additional set of eligibility criteria that need to be met before boiler repairs can be undertaken. These criteria for the most part mirror Ofgem's rules for installing involuntary prepayment meters.<sup>15</sup> This would limit boiler repair support in Wales under the Warm Homes Programme to:

- i) households with occupants aged 75 years and over or
- ii) households with children aged under 2 years old or
- iii) households with occupants with severe health issues including those with a medical dependency on a warm home – one of the existing health conditions. If a household qualifies for Nest via a health condition, they are eligible for this crisis route or
- iv) households with occupants with terminal illness.

While the Commissioner accepts that the Welsh Government's intention is to monitor the situation, it is completely unacceptable for any eligible household to lack a functioning heating and hot water system and for no action to be taken if low carbon solutions are not yet viable or appropriate.

Boiler repairs (or replacements in necessary circumstances) should be available to all eligible applicants without working heating or hot water where low carbon heating is not yet viable/appropriate, irrespective of age and health.

It is disappointing that boiler repairs, and even replacements, may still be the most appropriate solution in many more cases than would be desirable as Wales seeks to transition to Net Zero. Nevertheless, the alternative of leaving people without heating and hot water indefinitely should not be seen as any sort of viable or acceptable option, especially as winter approaches.

The Welsh Government should urgently clarify and publicise that boiler repairs and replacements are still a permitted activity under the Warm Homes Programme. This is especially the case given the UK Government's decision to restrict Winter Fuel Allowance payments to only older people in receipt of Pension Credit, the impact of which is discussed above.

Particularly in colder months, the priority has to be on ensuring that the homes of vulnerable people, many of whom will be older people, are warm, safe and energy efficient. Cold homes present a significant threat to the health of older people. Preparation to make homes low carbon ready is rightly an important aspect of the Warm Homes Programme but the main initial focus must be measures to ensure homes are warm, safe, energy efficient and protect the health of all who live in them. No eligible person should be left in a crisis situation without an operational heating and hot water system.

Other concerns with the Warm Homes Programme include the scale of the scheme (particularly given rising energy prices and the cost-of-living crisis), the overall levels of funding provided to undertake activity, and the processes for monitoring, evaluation, and reporting on progress. There is a need to monitor and record requests from people who did not receive assistance when they were eligible to do so, as well as people who do not fall within the eligibility criteria to understand if changes are needed. Some households may be left unsupported as the eligibility criteria for the programme may not capture all those in need.

---

<sup>15</sup> See Ofgem (2023), New rules for installing involuntary prepayment meters. Available at: [New rules for installing involuntary prepayment meters | Ofgem](#)

## Effectiveness of other support

The support available to households in or at risk of fuel poverty includes the Welsh Government Discretionary Assistance Fund (DAF) and support via the Fuel Bank Foundation. There is no longer a specific Winter Fuel payment available from the Welsh Government.

The numbers of older people using the DAF are low in proportion to other age groups. The eligibility criteria for qualifying for payments are narrow, for example 'be in extreme financial hardship, for example you've lost your job, applied for benefits and waiting for your first payment or have no money to buy food, gas and electricity'.<sup>16</sup> This rules out older people who need support as a result of fuel poverty but who are not in absolute crisis. The latest DAF figures (June 2024)<sup>17</sup> show 810 people between 69 and 69 years old in receipt of support via this avenue, while the numbers for people aged over 70 were even lower, with only 160 payments. This is in contrast to 2,235 people aged 50-59.

## Welsh Government co-operation with UK Government on fuel poverty

The UK Government announced that it would extend the Household Support Fund in England to help struggling households with bills and essential costs over the winter, with associated Barnett consequential for Wales.<sup>18</sup> It is vital that some of the additional financial resources available are used to specifically support older people struggling as a result of the changes to Winter Fuel Allowance. Additional funding should not simply be added to existing support channels such as DAF where it is unlikely to reach all older people who need it.

Overall, the picture of how the Welsh Government and the UK Government will work together on addressing fuel poverty is still emerging. There may be future opportunities. For example, the UK Government has introduced the Great British Energy Bill where one of the stated objectives is 'improvements in energy efficiency'. What this might mean for Wales over the years ahead is not yet clear. More detail is needed on how the Welsh Government and UK Government plan to tackle fuel poverty.

## Conclusion

Fuel poverty is a serious issue that adversely affects the health and wellbeing of a significant number of older people across Wales. The impact of the restriction of Winter Fuel Allowance payments in 2024-25 is likely to push more older people into fuel poverty. The Commissioner would like to highlight the following areas:

---

<sup>16</sup> Guidance on the Discretionary Assistance Fund (DAF). Available at: <https://www.gov.wales/discretionary-assistance-fund-daf/eligibility>

<sup>17</sup> Discretionary Assistance Fund by Age - Monthly data (April 2023 Onwards). Available at: <https://stats.wales.gov.wales/Catalogue/Community-Safety-and-Social-Inclusion/discretionary-assistance-fund/discretionaryassistancefund-by-age-monthly>

<sup>18</sup> Can be seen at: <https://www.gov.uk/government/news/government-support-extended-to-help-struggling-households-with-bills-and-essential-costs-over-winter>

- The need for the Welsh Government’s Warm Homes Scheme to achieve a better balance between the transition to Net Zero and putting in place effective measures to make homes warm, safe and energy efficient in the shorter term. This must include the provision of boiler repairs and replacements when this is the best available option and no eligible household should be left without heating or hot water.
- Clarity must be provided to all those involved in the Warm Homes Programme, including referring agencies and the public, about the full range of permitted support measures.
- Better, reliable and more up to date data on fuel poverty in Wales should be collected and published which allows the experiences of different groups of citizens to be easily understood. Ideally, this would include five year age bands to be able to assess the experiences of different groups of older people. The biennial review of performance towards 2035 objectives, which was a commitment in the “Tackling fuel poverty 2021 to 2035” plan, must be published on time in future.
- The development and introduction of interim energy efficiency-based targets to address fuel poverty should be undertaken by the Welsh Government and put in place by the end of the current Senedd term in 2025.
- Specific support for older people experiencing fuel poverty (or greater fuel poverty) as a result of the restriction of Winter Fuel Allowance should be put in place urgently by the Welsh Government, with ongoing funding identified in the Welsh Government’s draft budget for 2025-26.

**Name:** Sion Wyn Evans

**Job Role:** Policy and Practice Lead, Older People’s Commissioner for Wales



Cyflwynwyd yr ymateb i ymgynghoriad y [Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol](#) ar [Tlodi Tanwydd yng Nghymru](#)

This response was submitted to the [Equality and Social Justice Committee](#) consultation on [Fuel Poverty in Wales](#)

FP06

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

---



## Public Health Wales NHS Trust

### Submission to the Equality and Social Justice Committee follow-up inquiry into fuel poverty and the Warm Homes Programme

Nb: Welsh language version to follow shortly.

#### Summary

- Living in a cold home (below 18°C) has significant public health implications, as shown by the evidence in this response.
  - Spending less on heating homes creates cold and damp conditions and can compound existing poor quality or poorly insulated housing. This can be bad for health, increasing the risk of heart and lung conditions, or infectious respiratory illnesses such as influenza (flu).
  - Particularly at risk are older people, the very young and those who have underlying health conditions.
- The current picture of fuel poverty in Wales should be based on up-to date data and evidence which reflect changes to housing energy efficiency, disposable income and the cost of energy on health, well-being and equity in Wales. Public Health Wales would welcome the further collection of data on fuel poverty and population groups at risk. Further, that the impacts of fuel poverty on physical and mental health and on health inequalities are duly considered and that a preventative approach is taken.
- In November 2024, Public Health Wales will publish the '*Cold Homes in Wales: Is the satisfactory heating regime appropriate for health and well-being?*' report, which was commissioned by Welsh Government as part of its Tackling Fuel Poverty 2021 to 2035 plan to assess the appropriateness of the satisfactory heating regime to keep people comfortable and safe.
  - The report provides evidence-informed recommendations on the satisfactory heating regime and seeks to inform the approach to tackling fuel poverty in Wales to help protect and promote health, well-being and equity. The findings of this report will be used in our oral evidence.

## Introduction

Public Health Wales NHS Trust is the national public health organisation for Wales. We work to protect and improve health and well-being and reduce health inequalities for the people of Wales. We are pleased to respond to the Equality and Social Justice Committee follow-up inquiry regarding fuel poverty and the Warm Homes Programme. This response provides evidence from the Public Health Wales *Housing Warmth and Health and Well-being in Wales* programme that was undertaken in conjunction with Bangor University, including the recent publication of a '[Keeping warm at home during winter in Wales](#)' report and a systematic review on '[Cold homes and their association with health and well-being](#)'.

Housing and financial security and well-being, which enable individuals and families to adequately heat their homes, are wider determinants of health. With rising energy and food costs, for example, more people are experiencing fuel poverty and having to choose between feeding their families and keeping the lights and heating on. The stress and anxiety that comes with these decisions takes a toll on mental health. Poorer mental health can also lead to poorer physical health, and can increase health harming behaviours, such as smoking, alcohol consumption and low physical activity levels (Roberts et al., 2022<sup>1</sup>).

A systematic review from Public Health Wales and Bangor University found that indoor temperatures below 18°C are associated with negative effects on health (Janssen et al., 2023<sup>2</sup>). Spending less on heating homes creates cold and damp conditions and can compound existing poor quality or poorly insulated housing. This can be bad for health, increasing the risk of heart and lung conditions, or infectious respiratory illnesses such as influenza (Roberts et al., 2022).

Public Health Wales is therefore responding to this enquiry to provide further evidence highlighting these health impacts in relation to fuel poverty. Public Health Wales believes that any future policy and action addressing fuel poverty should place

---

<sup>1</sup> Roberts M, Petchey L, Challenger A, Azam S, Masters R, Peden J. *Cost of living crisis in Wales: A public health lens*. Cardiff: Public Health Wales. 2022. Available from: [Cost of living crisis in Wales: A public health lens - World Health Organization Collaborating Centre On Investment for Health and Well-being \(phwwhocc.co.uk\)](#).

<sup>2</sup> Janssen H, Ford K, Gascoyne B, Hill R, Roberts M, Bellis MA, et al. Cold indoor temperatures and their association with health and well-being: a systematic literature review. *Public Health*. 2023;1;224:185–94. doi.org/10.1016/j.puhe.2023.09.006

focus on maximising opportunities to protect health and well-being among current and future populations in Wales.

### **Response to the terms of reference of the inquiry**

The purpose of this paper is to respond to the terms of reference for the inquiry from a public health perspective, using evidence drawn from the Public Health Wales *Housing Warmth and Health and Well-being in Wales* programme. Our responses are set out below.

#### *Whether there is an accurate picture of fuel poverty in Wales today, given that data is based on the 2008 Living in Wales Survey and 2017-18 Wales Housing Conditions Survey*

An accurate picture of fuel poverty in Wales today should present up-to-date estimates of energy efficiency; disposable income; and the cost of energy, and should seek to identify those population groups that are most at risk of living in fuel poverty and the associated physical and mental health harms. Fuel poverty is associated with living in a cold home, which is a risk factor for poor physical and mental health, including winter and cold related deaths.

Work undertaken by Public Health Wales and Bangor University as part of the *Housing Warmth and Health and Well-being in Wales* programme has helped to address some of these gaps by updating the evidence on the impacts of cold homes on health and well-being. The [systematic review](#) found:

- Indoor temperatures below 18°C are associated with negative effects on health. These negative effects were related to cardiovascular and respiratory health, sleep, physical performance (an important risk factor for falls and fall-related injuries) and general well-being.
- Some population groups are understood to be particularly at risk of poorer health from exposure to cold indoor temperatures, including older people, children and individuals living with disabilities or long-term health conditions, particularly cardiorespiratory disease.
- There is a gap in the research on fuel poverty and heating practices, and what this means for health and well-being.

Drawing on the identified gaps identified in the systematic review and contributing to the picture of fuel poverty in Wales, Public Health Wales and Bangor University conducted a national household survey of adults resident in Wales, from January to March 2022 – known as The Housing Warmth Survey (Wales). This survey was repeated with a sub-sample of participants from January to March 2023, to explore changes in how people stay warm at home during winter and the impacts on health and well-being.

The survey did not measure fuel poverty, but the findings provide insight into heating practices used in households in Wales over a time of increasing domestic energy costs. Survey findings published in the 2024 report [Keeping Warm at Home in Wales](#), reveal that:

- Participants reported setting their thermostats to lower temperatures in 2023, with the mean reported thermostat setting decreasing significantly<sup>3</sup> from 19.9°C in 2022 to 19.3°C in 2023.
- The duration of heating also reduced from 10.2 hours to 9.8 hours across weekdays and 10.6 hours to 10.2 hours at weekends from 2022 to 2023 respectively, although this reduction was non-significant.
- There was a significant reduction in the proportion of participants who reported that their first response to feeling cold was to turn up the heating temperature from 17.2% in 2022 to 10.2% in 2023. Other changes in behaviours such as putting on extra clothes were non-significant.
- There was a significant increase in the proportion of participants who reported any stress or anxiety in the previous three months over the costs of heating their home (from 57.2% in 2022 to 66.5% in 2023).
- There was an increase in the proportion of participants who reported cutting the size of their meal or skipping meals in the previous three months due to heating costs (from 9.1% in 2022 to 11.3% in 2023), although this finding was non-significant. However, more recent research in Wales (winter 2023/24) found a quarter of people (24%) reported that they either cut down on the

---

<sup>3</sup> A p-value less than or equal to 0.05 indicates a statistically significant result.

size of a meal or missed a meal for themselves in the three months to January 2024 (Bevan Foundation, 2024<sup>4</sup>).

- Nine in ten participants reported thermal comfort in their main living area, but there was a significant decrease in the proportion of participants reporting thermal comfort (from 94.0% in 2022 to 89.5% in 2023). A lack of thermal comfort is linked to poorer well-being (Huebner et al, 2023<sup>5</sup>).

The above findings are important because they identify a change towards lower heating temperatures in home environments in Wales and the reduction in duration of heating being used. The findings show that in 2023 compared with 2022, more people in Wales were reporting heating their homes to a lower temperature, being exposed to the dilemma of whether to ‘heat’ or ‘eat’, and feeling stress or anxiety over their heating costs.

In November 2024, Public Health Wales will publish the report ‘*Cold Homes in Wales: Is the satisfactory heating regime appropriate for health and well-being?*’, which was commissioned by Welsh Government as part of its Tackling Fuel Poverty 2021 to 2035 plan to assess the appropriateness of the satisfactory heating regime to keep people comfortable and safe. The report will further contribute to the picture of fuel poverty in Wales by:

- Bringing together evidence from The Housing Warmth Survey (Wales), the available literature, and expert consultation and advice.
- Exploring the heating regimes used in homes in Wales during winter; who is at risk of living in colder homes (defined as homes where thermostats are set to below 18°C); and the impacts of living in colder homes on health and well-being.
- Providing a set of evidence-informed recommendations on the satisfactory heating regime which could inform the approach to tackling fuel poverty in Wales, to help protect and promote health, well-being and equity.

---

<sup>4</sup> Bevan Foundation. *A snapshot of poverty in winter 2024*. Merthyr Tydfil: The Bevan Foundation. 2024. Available from: [A snapshot of poverty in winter 2024 - Bevan Foundation](#).

<sup>5</sup> Huebner GM, Hanmer C, Zapata-Webborn E, Pullinger M, Mckenna J, Few J, et al. Self-reported energy use behaviour changed significantly during the cost-of-living crisis in winter 2022/23: insights from cross-sectional and longitudinal surveys in Great Britain. *Scientific Reports*. 2023;13:21683. doi.org/10.1038/s41598-023-48181-7.

The *Housing Warmth and Health and Well-being in Wales* programme has been informed by modelled estimates of fuel poverty in Wales published by the Welsh Government (Welsh Government, 2022<sup>6</sup>). These modelled estimates have shown a significant rise in the number of people that could be living in fuel poverty; with up to an estimated 45% (614,000) in April 2022 compared to 14% (196,000) in 2021. Therefore, more people are expected to be living in cold homes (below 18°C) and experiencing the associated health impacts. Nevertheless, there are several cautions to consider for an accurate picture of fuel poverty in Wales:

- Much has changed regarding fuel poverty since the 2008 Living in Wales Survey and the 2017-18 Wales Housing Conditions Survey, which means they do not give the full picture of fuel poverty in Wales today.
- Higher costs of living, including higher energy prices, claim a greater proportion of households' disposable income and can increase rates of fuel poverty. A previous Public Health Wales publication reported that the cost of living crisis meant that more people were unable to afford the essentials, having wide-ranging negative impacts on mental and physical health (Roberts et al., 2022).
- Energy price rises are likely to hit lower income households disproportionately, given their proportionately higher spending of income on utility bills.
- A combination of inter-related factors should be taken into account including the energy efficiency of a dwelling; disposable income; and the cost of energy as these are the three key factors contributing to fuel poverty<sup>7</sup>. These factors change over time and thus up to date data needs to be collected.

To conclude, we would recommend further collection of data on fuel poverty and population groups at risk of experiencing fuel poverty and that data collection considers the impacts of fuel poverty on physical and mental health.

---

<sup>6</sup> Welsh Government. *Fuel poverty modelled estimates for Wales (headline results): as at October 2021*. 2022. Available from: [Fuel poverty modelled estimates for Wales \(headline results\): as at October 2021 \[HTML\] | GOV.WALES](#).

<sup>7</sup> ONS. *How fuel poverty is measured in the UK*. 2023. Available from: [How fuel poverty is measured in the UK - Office for National Statistics](#)

*The potential impact of changes to the eligibility criteria for the Winter Fuel Payment on fuel poverty in Wales.*

Public Health Wales believes that the potential impact on health and well-being should be considered, when making any changes to the eligibility criteria for the Winter Fuel Payment in Wales. This is because current evidence shows the vulnerability of older adults and low-income households. For example, although, the World Health Organization recommends a minimum indoor temperature of 18°C for general populations during cold seasons in temperate and colder climates, it states that a higher minimum temperature may be necessary for vulnerable groups, including children, the elderly and those with chronic illness<sup>8</sup>. This is because they are particularly vulnerable to the negative impacts on health that a cold home can have.

The Public Health Wales and Bangor University systematic review further highlights that older adults are particularly at risk of the negative impacts on health from living in a cold home (Janssen et al., 2023), and therefore any changes to eligibility criteria for the Winter Fuel Payment should consider this.

People living in the poorest parts of Wales face a complex web of challenges that lead them to die more than six years earlier than those in the least deprived areas and spend more years in poorer health (Roberts et al, 2022). A previous Public Health Wales report applying a public health lens to the cost of living crisis in Wales noted that the cost of living would push more people from just about coping to a state of struggling or crisis, but that those who were already the worst off were those who would be hardest hit, accelerating what were already increasing differences in health between those with more and less money in Wales (Roberts et al., 2022). As such, any potential impact of changes to the eligibility criteria for the Winter Fuel Payment on fuel poverty in Wales would need to consider socio-economic status, in line with the requirements of the socio-economic duty introduced as part of the Equality Act 2010, as well as any impact on health inequalities.

---

<sup>8</sup> World Health Organization. *WHO housing and health guidelines*. World Health Organization. 2018. Available from: [WHO Housing and health guidelines](#)

Cyflwynwyd yr ymateb i ymgynghoriad y [Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol](#) ar [Tlodi Tanwydd yng Nghymru](#)

This response was submitted to the [Equality and Social Justice Committee](#) consultation on [Fuel Poverty in Wales](#)

FP04

Ymateb gan: Age Cymru | Response from: Age Cymru

---





**Equality and Social Justice Committee**  
**Consultation: Fuel Poverty in Wales**  
**From: Age Cymru**  
**November 2024**

**1. Introduction**

1.1 Age Cymru is the leading national charity working to improve the lives of all older people in Wales. We believe older people should be able to lead healthy and fulfilled lives, have adequate income, access to high quality services and the opportunity to shape their own future. We seek to provide a strong voice for all older people in Wales and to raise awareness of the issues of importance to them.

1.2 Fuel poverty modelled estimates for Wales, as October 2021, report that households in fuel poverty are generally older.<sup>1</sup> In October 2021, 24% of all fuel-poor households contained a Household Reference Person (HRP) aged over 75 and 41% contained an HRP aged 65 or over.<sup>2</sup>

1.3 The National Survey for Wales recently reported that 25% of 65-74 year olds and 17% of those aged over 75 say they sometimes or always struggle to pay bills.<sup>3</sup> Around 18% of older people in Wales live in relative income poverty.<sup>4</sup>

**2. Whether there is an accurate picture of fuel poverty in Wales today, given that data is based on the 2008 Living in Wales Survey and 2017-18 Wales Housing Conditions Survey.**

2.1 It's important that the Welsh Government publishes up to date fuel poverty estimates for Wales to provide an accurate picture of fuel poverty at both national and local levels. To tackle fuel poverty effectively and to evaluate the progress and effectiveness of its Fuel Poverty Plan, Welsh Government should provide up to date fuel poverty estimates and updated data on housing stock quality for Wales. Current estimates of fuel poverty continue to be modelled on the Welsh Housing Conditions Survey 2017-18, which was prior to the energy and cost-of-

---

<sup>1</sup> [Fuel poverty modelled estimates for Wales: as at October 2021 | GOV.WALES](#)

<sup>2</sup> Ibid.

<sup>3</sup> [Understanding-Wales-ageing-population-September-24.pdf \(olderpeople.wales\)](#), citing Welsh Government (2023) National Survey for Wales April 2022 to March 2023 [National Survey for Wales: results viewer | GOV.WALES](#)

<sup>4</sup> [careandrepair.org.uk/housing2023/](#)

living crisis. The survey should be repeated as soon as possible to provide updated information.

### **3 The potential impact of changes to the eligibility criteria for the Winter Fuel Payment on fuel poverty in Wales.**

3.1 The Cabinet Secretary for Social Justice, Trefnydd and Chief Whip stated in response to a Written Question on 9 August 2024, “The decision that the Winter Fuel Payment will no longer be universal risks pushing some pensioners into fuel poverty”.<sup>5</sup>

3.2 We believe that changes to the eligibility criteria for the Winter Fuel Payment this winter, with virtually no notice, and no compensatory measures to protect poor and vulnerable pensioners, risks pushing older people into fuel poverty in Wales.

3.3 We believe that thousands of older people in Wales will be impacted by this cut. There are three key groups of older people we are particularly concerned about:

- those who just miss out on Pension Credit because their very modest incomes are slightly too high for them to be eligible.
- those with high energy needs because of disability or illness, and/or who live in energy inefficient homes which cost a lot of money to heat.
- the estimated 56,000<sup>6</sup> households in Wales that don't receive the Pension Credit for which they are eligible because they do not claim it.

3.4 In Age Cymru's 2024 annual survey with over 1300 older people across Wales<sup>7</sup> we heard that almost half of respondents found the cost-of-living to be a challenge over the last 12 months, and over half of respondents had issues with their physical health. We are concerned that this may only worsen with cuts to this vital financial support during the winter months.

3.5 We've heard from Age Cymru Advice about the concerns highlighted by older people around the loss of the Winter Fuel Payment and the anxiety and uncertainty this posed for older people. Older people with fixed incomes express they're very concerned, not just about their current circumstances, but about what is going to happen next as there have been so many changes in recent years. People don't feel their circumstances are improving and yet support is being withdrawn.

---

<sup>5</sup> <https://record.senedd.wales/WrittenQuestion/93698>

<sup>6</sup> Age UK calculations based on the latest available data from the Office for National Statistics parliamentary constituency population estimates (mid-2022) released 19th March 2024, Department for Work and Pensions (DWP) Pension Credit recipient numbers (February 2024), DWP Universal Credit recipient numbers (June 2024) and DWP income-related benefit take-up figures (financial year ending 2022) released 26 October 2023. Estimates of figures of older people missing out because they are not in receipt of qualifying benefits they are entitled to, assumes Pension Credit take-up rate is uniform across the geography of England & Wales. All data accessed on 22nd August 2024. Figures on number of people are rounded to the nearest hundred.

<sup>7</sup> [Age Cymru | Annual survey](#)

3.6 We have included a table about some topics and enquiries that Age Cymru Advice have logged this year in relation to the same period last year, which shows increases in enquiries around benefit checks, including Pension Credit and the Winter Fuel Payment, compared to the same reporting period last year. The table also shows an increase in enquiries around home improvements and energy efficiency.

**3.7 Table of some topics and enquiries Age Cymru Advice Line team have logged this year in relation to the same period last year:**

<b>Topics</b>	<b>Total enquiries for reporting period Jan 1 – Sept 30 2023</b>	<b>Total enquiries for reporting period Jan 1 – Sept 30 2024</b>	<b>Percentage increase</b>
<b>Benefit Check</b>	<b>672</b>	<b>940</b>	<b>40%</b>
<b>Pension Credit</b>	<b>151</b>	<b>301</b>	<b>99%</b>
<b>Winter Fuel Payment</b>	<b>9</b>	<b>112</b>	<b>1144%</b>
<b>Total for Benefits</b>	<b>2787</b>	<b>3668</b>	<b>32%</b>
<b>Home improvements/ energy efficiency</b>	<b>149</b>	<b>213</b>	<b>43%</b>

3.8 The UK Government has said more will be done to encourage those entitled to Pension Credit to claim it but this will take time and won't stop many missing out this year.

3.9 We want the UK Government to rethink their decision on Winter Fuel Payments. We've been hearing from people in Wales about how they'll really struggle without the Winter Fuel Payment – with people cutting down on food, heating, hot water. We were disappointed by the lack of mitigating measures or financial support in the UK budget in October 2024 for the thousands of older people in Wales who will no longer receive the Winter Fuel Payment.

3.10 We welcome the extra funding for the Household Support Fund in the UK October budget and look forward to seeing how this translates in support for older people in Wales.

**4 The detail of the new Warm Homes Programme, including the energy efficiency measures offered, changes to eligibility criteria, the approach to delivering advice services, and the development of an area based approach.**

- 4.1 We were supportive of the new Warm Homes Programme having some flexibility 'to support the most vulnerable in society in exceptional circumstances [...] For example, when moving from fossil fuels to an electric heating system that would cause a significant increase in running costs [...] the priority could be the repair of energy-efficient gas boilers'.<sup>8</sup>
- 4.2 Feedback we've received from Age Cymru Advice, however, is that older people that have applied for Nest are being offered Air Source Heat Pumps seemingly as the only option. We've heard that people are concerned about the potential cost of running a heat pump, and are worried about how to use such technology.
- 4.3 We heard from a lady who was quite frustrated because the only thing NEST could offer was a heat pump and that wasn't suitable for her property. She needed a new boiler and they couldn't help.
- 4.4 Since changes to the Nest scheme in Wales, we're hearing that there's a lot of confusion and concern around what support people may be able to access should their boiler stop working. The support people received in the previous Nest scheme was always highly spoken of. Many have shared that they've been informed they can only access a heat pump, however, as they live in older properties or do not have the space for a heat pump, they're unable to get one installed.
- 4.5 Heat pumps aren't suitable for all homes.<sup>9</sup> We noted in the Welsh Government's Heat Strategy for Wales consultation document that 'the upfront costs of heat pumps are still beyond the means of many people [...]' and 'The operational costs of heat pumps compared to gas boilers are one of the major barriers to the transition [...]'.<sup>10</sup>
- 4.6 We believe that Welsh Government should undertake equality impact assessments to ensure that low income and vulnerable households are not disproportionately affected financially by the decarbonisation of the existing housing stock, to ensure a fair transition for older consumers as we move towards net zero.
- 4.7 Whilst we note that 'Long-term investment in fossil fuel heating systems will be permitted only exceptionally under the new Warm Homes Programme',<sup>10</sup> we have concerns about those households where, for example, the gas boiler is not repairable, and which would be unable to meet the upfront and/or running costs of a heat pump. It's important that such households are supported to be able to have a warm home, and that assessors involved in the new Nest scheme are aware of the flexibility in the Programme and take such issues into account.
- 4.8 Welsh Government recently proposed a 'Nest Crisis Boiler Repair/Replacement' route to enable eligible Nest applicants who meet additional eligibility criteria to access boiler repairs (or replacements in exceptional circumstances), i.e. 'If a

---

<sup>8</sup> [outcome-summary-tackling-fuel-poverty-2020-to-2035.pdf \(gov.wales\)](#)

<sup>9</sup> [Heat pumps 'not suitable' for half of UK homes - Utility Week](#)

<sup>10</sup> [outcome-summary-tackling-fuel-poverty-2020-to-2035.pdf \(gov.wales\)](#)

household does not have an operational heating and hot water system'. Welsh Government has proposed an approach to trial boiler repairs for 2024-25, limiting boiler repairs exclusively to eligible households with occupants aged 75 years and over, or with children under two years old, or with occupants with a relevant health condition, or terminal illnesses.

4.9 We would deem that any household without an operational heating or a hot water system would be in crisis during the cold winter months, and that all households that are eligible for Nest should qualify for the crisis boiler repair / replacement measure.

4.10 Should Welsh Government retain eligibility criteria for these measures, then these should be broadened:

4.10.1 Due to the impact that cold homes have on health, especially during the cold winter months, we would wish to see the age criterion of households with 'occupants are aged 75 and over' changed to 'occupants are aged 65 and over'. Many older people in Wales experience poor health, as evidenced by the fact that healthy life expectancy is as low as 59 in some places and that two-thirds of people aged 65+ report living with a longstanding illness.<sup>11</sup> A report by the Centre for Ageing Better (coverage in England) highlights 'when people in the most deprived areas get to the age of 65, they have twice as many years of ill-health ahead of them as those in the least deprived areas, despite the fact they are also likely to live shorter lives'.<sup>12</sup> In the UK, two-thirds of adults aged over 65 are expected to be living with multiple health conditions (multi-morbidity) by 2035; most people over 65 will be affected by arthritis (62.6%), followed by high blood pressure (55.9%), respiratory disease (24.4%), cancer (23.7%) and diabetes (21.6%).<sup>13</sup>

4.10.2 Due to the impact that cold homes have on health, especially during the cold winter months, we would wish to see the eligibility criterion of 'households with children aged under 2 years old' extended to include children up to and including the age of 5 years old. Households with pregnant women should also be included.

4.11 It's important that the 'Nest Crisis Boiler Repair/Replacement' route is widely publicised, and that Nest assessors are aware of these criteria when carrying out assessments on homes, to ensure that people are not being left without support.

## **5 The effectiveness of support available to households in or at risk of fuel poverty, in addition to the Warm Homes Programme.**

5.1 Some older people are turning to various schemes to improve their homes' energy efficiency in the hopes that it will bring their monthly energy payments down. Many are using savings they had set aside for funeral expenses,

---

<sup>11</sup> [Impact of reported NHS Pressures on older people™s access to health services](#)

<sup>12</sup> [Health and Wellbeing | The State of Ageing 2023-24 | Centre for Ageing Better \(ageing-better.org.uk\)](#)

<sup>13</sup> [Multi-morbidity predicted to increase in the UK over the next 20 years \(nih.ac.uk\)](#)

healthcare or social care if needed. Concerningly, a number of these people have been approached by tradespersons who are selling unfit or unsuitable products.

5.2 Rising energy prices and increased public interest in improving home energy efficiency have had the unfortunate side effect of encouraging fraud and business malpractice in the domestic energy sector. Age Cymru and partner organisations have received multiple reports of exploitative business practice by installers. This includes:

- Aggressive sales tactics, often targeted at older and more vulnerable people
- Installing measures that are not financially viable for the occupant, or which cause damage to the property
- Undertaking work without a contract
- Shortened 'cooling off' periods to minimise the customer's right to complain
- Misleading advertising that uses false or manipulated 'endorsements' from charities or government.

5.3 One increasingly common example that draws on several of these behaviours is the selling of spray foam loft insulation.<sup>14</sup>

- Some cases picked up by Age Cymru include:
  - o A partner charity reported that an older client had spent £3,500 to have spray foam installed, only to pay another £2,000 to remove the foam when they realised that their home was no longer marketable. During the time taken for the foam to be removed, the house's value had dropped by £15,000.
  - o An older person was referred to Age Cymru Advice after losing over £8,000 to a doorstep trader who claimed that they 'needed' to replace their existing loft insulation with a new model.

5.4 Exploitative behaviour from traders is in part a result of the terms of the UK Government's ECO scheme,<sup>15</sup> which lacks inbuilt regulation and works on a financial incentive for traders to seek out clients:

- Reports made to Age Cymru have mentioned rogue traders using the ECO branding in their advertisements, claiming that the ECO scheme allows them to charge their clients a discounted rate (a ruse used to get them to pay full price).
- We recommend that the UK Government rethinks the ECO scheme in advance of the termination of ECO4 in 2026, with a view to increasing regulation and removing incentives for installers to pursue sales aggressively and without due consideration for the potential vulnerability of clients.

## **6.0 How the Welsh Government is working with the UK Government to address fuel poverty.**

6.1 The high cost of energy remains an area requiring particular attention given the direct link that energy prices have to levels of fuel poverty. It is of vital importance

---

<sup>14</sup> [RICS release new spray foam consumer guide](#)

<sup>15</sup> [Energy Company Obligation \(ECO\) | Ofgem](#)

that Welsh Government, as stated in its Tackling Fuel Poverty Plan, uses its influence to ensure that the UK Government, Energy Regulator and energy companies consider and meet the needs of people living in Wales.<sup>16</sup>

- 6.2 Age Cymru Advice has reported the following issues around fuel poverty and older people in recent months, notably the cost of energy, energy debt, and difficulties in providing meter readings.
- 6.3 Older people often cite their energy bill as one of their largest and most concerning outgoings (due to the uncertainty around the fluctuations in price). Older people have also expressed that they're concerned they'll be forced onto prepayment meters and will be paying even more for their energy and are concerned about being without fuel.
- 6.4 We are getting more enquiries from people who are disclosing that they're struggling with a health condition. They often express that they are struggling to adequately heat their properties as the cost of energy has increased beyond what they're able to afford and their health condition requires them to keep the home at a certain temperature. We're also hearing from carers who are concerned about this on behalf of the older person they care for.
- 6.5 We speak with older people who live in larger, privately owned homes, unsuitable for their needs. A lack of suitable housing means they're finding it hard to move to a more suitable property and despite living in a larger property, they're often on low incomes. These older, larger homes are hard to heat and the older people who live in them are either foregoing heating or racking up energy debt which they're concerned they will be unable to pay.
- 6.6 Older people are expressing they're still struggling to provide meter readings. For some this leads to very large debts and can lead to incorrect bills with frequent changes to the Price Cap.
- 6.7 One individual we spoke with hadn't been able to take a meter reading in over a year as their mobility was poor and the meter was out of sight. Although they were signed up to the Priority Services Register, their supplier had declined to offer support with meter readings. This led to a debt of over £3,000 on the account.
- 6.8 Another individual we spoke with was provided with estimated meter readings as her meter was faulty. The supplier was initially reluctant to offer a new meter, however they have now agreed to do so. Unfortunately, during this time she has accumulated £500 in energy debt, and she is unsure whether this is correct. She's now concerned about putting her heating on this winter as she has this amount of debt, which she will struggle to pay.

Age Cymru is a registered charity 1128436. Company limited by guarantee and registered in Wales and England 6837284. Registered office address Ground Floor, Mariners House, Trident Court, East Moors Road, Cardiff CF24 5TD. © Age Cymru 2024.

<sup>16</sup> <https://gov.wales/tackling-fuel-poverty-2021-2035-html>

# WLGA CONSULTATION RESPONSE:

## Senedd inquiry: Fuel Poverty in Wales

25<sup>th</sup> November 2024

### INTRODUCTION

1. 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. The Association represent the interests of local government and promotes local democracy in Wales. The 22 councils in Wales are all members of the WLGA and the 3 fire and rescue authorities and 3 national park authorities are associate members.
2. WLGA believes 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.
3. The main aim of the Association is to promote, protect, support and develop democratic local government and the interests of councils in Wales. This means:
  - 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.

### General Points and comments

4. WLGA welcomes the opportunity to respond to this inquiry into fuel poverty in Wales.
5. Each of the issues listed in the terms of reference is considered below.

#### **Issue 1: Whether there is an accurate picture of fuel poverty in Wales today, given that data is based on the 2008 Living in Wales Survey and 2017-18 Wales Housing Conditions Survey?**

6. Given the significant events that have impacted on energy prices over recent years, the fact latest modelled estimates for fuel poverty in Wales are for 2021<sup>1</sup> means it is most unlikely that they reflect current circumstances.

---

<sup>1</sup> [Fuel poverty modelled estimates for Wales: as at October 2021](#)

7. In 2021, the estimate was that 14% of Welsh households (nearly 200,000) were in fuel poverty (spending more than 10% of their income on a satisfactory heating regime). Some 3% were thought to be in severe fuel poverty (spending over 20%).
8. Without taking into consideration the financial assistance provided by UK Government and assuming all households were on the price cap, Welsh Government estimated that 'up to 45%' of households (614,000) would potentially have been in fuel poverty following the price cap increase of April 2022. Due to the fact there was financial assistance and not all households would have been on the price cap, Welsh Government noted that this figure was an over-estimation of the scale of the problem. However, the fact there is no certainty over where the true figure sits, somewhere between 14 and 45%, clearly demonstrates the lack of an accurate picture. That makes policy interventions difficult to gauge and then monitor.

### **Issue 2: The potential impact of changes to the eligibility criteria for the Winter Fuel Payment on fuel poverty in Wales.**

9. In 2023/24, 605,172 Welsh households received a winter fuel payment according to DWP official statistics. Pension Credit (PC) data show just under 81,000 households in receipt of PC and therefore eligible for this year's payment. It is known that the number of claims to Pension Credit has risen by 150% as a result of the eligibility link introduced between PC and winter fuel payments and due to publicity to encourage take-up of the credit. However, due to delays in processing claims, no new data on recipients is yet available.
10. This month (November) it has been reported by the UK Government (UKG) that an estimated 50,000 pensioners in the UK could be living in relative poverty after housing costs next year as a result of cuts to the winter fuel payment (dependent on the level of take-up of PC). Letters have been sent by UKG to 120,000 pensioners in the UK to encourage take-up. An increase in the state pension will also offer some support.
11. Around 21.5% of the population in Wales is over 65, which is above the UK average of 18.9%<sup>2</sup>. Wales has approximately 5.3% of all the over-65s in the UK. Therefore, 2,650 of the 50,000 estimate for the UK could be in Wales (accepting that the 50,000 is a rounded estimate and therefore this is only a very rough guide).

### **Issue 3: The detail of the new Warm Homes Programme, including the energy efficiency measures offered, changes to eligibility criteria, the approach to delivering advice services, and the development of an area-based approach**

12. The Energy Savings Trust Wales Wide Energy Advice service is being proactive in understanding local energy efficiency schemes (including ECO Flex) and signposting households accordingly.
13. Low carbon measures such as heat pumps or solar panels with battery storage are within the scope of the programme and should help households become more resilient to rising energy prices in the future. Improving energy efficiency and moving to cleaner forms of residential heating will also reduce greenhouse gas emissions.

---

<sup>2</sup> [Population estimates by local authority and age](#)

14. An area-based approach offers opportunities for economies by undertaking multiple installations in the same area at the same time.
15. Whilst councils are supportive of the shift in emphasis towards decarbonisation in the programme, including the change from gas boiler replacement to installation of Air Source Heat Pumps (ASHPs), there are a number of issues to note, as follows:
- The long lead-in time for a 'whole house' PAS2035 scheme<sup>3</sup>, means there is a risk of households being left without heating and hot water;
  - WG has introduced a gas boiler repair service (and replacement in exceptional cases) for the most vulnerable 'crisis' households
  - Many ASHP schemes cannot progress because of a Welsh Government planning rule which requires there to be 3m distance from the property boundary).

**Issue 4: How changes from the previous programme will impact delivery, particularly in terms of the numbers of households that will be supported**

16. PAS2035 is a longer and more expensive process, and ASHPs are approximately three to four times more expensive than gas boilers, so there will be fewer households supported.
17. The shortage of trained engineers able not only to install but then to calibrate the ASHPs to ensure they operate at maximum efficiency has been identified more generally as an issue more broadly in terms of encouraging the roll out of ASHPs<sup>4</sup>.
18. By working in accordance with PAS 2035, however, *“every retrofit project is subject to monitoring and evaluation to determine whether the intended outcomes of the retrofit project have been realized, and to identify and learn from any project-specific or systematic problems with the retrofit risk assessment, the dwelling assessment, the retrofit design, the installation of EEMs (Energy Efficiency Measures) or the testing, commissioning or handover of EEMs.”*

**Issue 5: The extent to which the Warm Homes Programme is helping to address persistent fuel poverty in Wales, and if not, what further action is needed**

19. The new Nest contract, as part of the Warm Homes programme<sup>5</sup>, is demonstrating flexibility and applying lessons learned as it leads the way in moving away from fossil fuel-based heating systems. It needs to continue to do this, getting the balance between urgent support for households in crisis and developing systems and supply chains, to enable quicker and cheaper delivery of 'whole house' net zero retrofit in the future.

**20. Issue 6: The effectiveness of support available to households in or at risk of fuel poverty, in addition to the Warm Homes Programme**

21. The ECO4 energy company obligation scheme appears to be having a very patchy effect in Wales. The 35% rural 'off -gas' uplift has had a disproportionate impact in Wales,

<sup>3</sup> [PAS 2035:2023 Retrofitting Dwellings | BSI](#)

<sup>4</sup> [Shortage of trained heat pump installers could set back net zero | Nesta](#)

<sup>5</sup> [Understanding Nest scheme Wales - British Gas](#)

encouraging energy efficiency installers to focus on rural areas, and making it far more difficult to get measures installed in urban 'on gas' areas. Some areas have also reported that ECO funds are no longer available as national targets have been hit.

**Issue 7: How effective local authorities have been at accessing and utilising ECO Flex funding**

22. See point above. Although it is a step forward from previous ECO programmes that all councils in Wales have an active ECO4 Flex scheme (with welcome Welsh Government support provided to all LAs) it appears that those in rural areas, have been more successful in attracting ECO investment, due to the rural uplift. This has enabled them to charge higher 'referral fees' from installers, providing an income stream to allow more hands-on local management or marketing.

**Issue 8: How the Welsh Government is working with the UK Government to address fuel poverty**

23. WG have worked closely with WLGA in providing financial support to councils to develop and grow ECO4 Flex schemes, and in providing good communication via quarterly ECO4/ Fuel poverty meetings with councils (which WLGA facilitate). Support and advice from Local Partnerships (funded by WG) has also been very valuable in this respect.

---

Tim Peppin, Corporate Director

[Redacted signature block]

# Agenda Item 4.1



Colegau Cymru Response to the Senedd Finance Committee  
Consultation:  
Welsh Government Draft Budget 2025-26

November 2024

## Introduction

ColegauCymru is a post-compulsory education charity; we promote the public benefit of post-compulsory education and learning. We also convene the Further Education (FE) Principals' Forum, which represents FE colleges and FE institutions (FEIs) in Wales. ColegauCymru also undertakes research, policy development and provides practical support to FE colleges in Wales, including on work-based learning (WBL) which is a key part of FE college activity.

ColegauCymru welcomes the opportunity to submit its response to the Senedd's call for information – Welsh Government Draft Budget Proposals for 2025-26. This response is being shared with the following Senedd Committees – Children, Young People and Education; Economy, Trade and Rural Affairs; Equality and Social Justice; and Finance Committee. We have focused our response on questions most relevant to both FE and work-based learning.

FE and apprenticeships are fundamental to our economic recovery and to the fairer, greener, stronger society we all want to build. Any reduction in funding for FE or apprenticeships will weaken the potential for sustainable economic growth and impact the life chances of people living in our poorest communities. The cumulative impact of any potential budget reductions to FE and apprenticeships should be understood as a whole. The time to invest in our learners, our workers, and our second-chancers is now. For example:

1. The education and social impact of the pandemic is still evident through poor levels of attendance in schools, significant mental health challenges facing many learners, and evidence of wider behavioral challenges of learners entering college. FE needs to be properly resourced to allow it to mitigate the impact of the pandemic during school education and to ensure the most vulnerable learners are not doubly disadvantaged. Recent analysis by ColegauCymru shows that enrolment in the 16-18 age group for 2024/25 has increased by 8.27% since 2023/24. Enrollment figures have particularly increased for those learners coming in at lower levels, and learners who require support to remain in education.
2. The Welsh Government has provided some support for colleges to employ additional staff to cover Additional Learning Needs (ALN), however this has been through limited, temporary grants. These come to an end in March 2025, and while they have supported some increase in staffing, colleges are finding that they have not provided the capacity required to meet the needs of a growing cohort of ALN learners as we move to full implementation in 2025/26.
3. The Welsh Government's research from March 2023 shows that 41% of 16 to 24 years olds identified transport as being the number one barrier to getting a new course, training or a job. Learners currently face a postcode lottery of transport provision across Wales.

4. Any reduction in funding for FE and WBL will severely undermine drive towards Green Jobs and Growth, and specifically enabling businesses to achieve their net zero targets and affect our ability as a nation to be able to attract the kind of investment that we need for the future. As the Welsh Government looks to speed up the pace of renewable energy developments it is vital that there is a pipeline of skills and talent to maximise the benefit to local communities.
5. Full-time learner numbers in FE have recovered strongly since the pandemic, increasing by 2,500 between 2023/4 and 2024/5. We estimate this has added around £23m of unfunded delivery for 2024/5. However, the greatest growth has been in learners studying at either Level 2 or at Entry Level. While there has been growth in Level 3 (A Levels and L3 vocational provision), the growth has been in those learners who didn't achieve the threshold of 5 A\*-C grades at GCSE and will therefore be starting on lower level programmes. These are learners who will require more support and will probably need to stay in college for an additional year.

## 1. Background

There are multiple financial pressures on the FE sector, both in-year and looking ahead to 2025/6. These pressures come after successive years of challenging settlements and significant cost cutting measures already undertaken. Over the last two years the majority of institutions have undertaken redundancy processes in some form and all colleges have been engaged in wider efficiency exercises. This reflects the long-standing willingness of the sector to make difficult short-term decisions in order to secure the long-term viability and quality of provision. However, and as we set out last year, the impact of budget reductions to work-based learning alongside significant pressures in the mainstream FE budgets, mean that colleges will be faced with a challenging position at the start of the 2025/6 academic year.

A combination of previous efficiency exercises, the impact of inflationary pressures and the pressure on the curriculum and learner services means that there is now limited scope for the sector to absorb further pressures without a significant impact on staffing levels, learner support and the breadth of the curriculum offer. Funding for vocational and academic provision has not increased in line with the actual cost of delivery over a number of years. This has had the impact of asking colleges to deliver more with less. Funding needs to better reflect the cost of delivery, for example the significant rise in the cost of consumables on vocational programmes.

We know that demand across the tertiary sector is not uniform but demand for FE, and in particular vocational provision, is rising. Learner numbers in further Despite pressure on the Welsh Government budget, there is an opportunity to invest in the sector for long term gains. With Wales looking for a pathway out of flat economic growth, a strong FE and WBL sector is needed more than ever. Yet to play our role in delivering the fairer, stronger and greener Wales we all want to see, colleges need the sustained financial support to ensure that learners get the

high-quality education they deserve and that employers access to the skills they need to grow for the future.

There is no route map to a better Wales that doesn't rely on a thriving, resilient and successful FE and WBL sector. Colleges are training, re-skilling, and upskilling tomorrow's plumbers, counsellors, welders, caterers, cyber security specialists, nurses, heat pump system installers, web designers, social care workers, and many more. At a time when both learners and employers need access to FE the most, the Welsh Government must prioritise investment in the sector.

## 2. What, in your opinion, has been the impact of the Welsh Government's 2024-2025 Budget?

Last year the sector absorbed a 14% cut to apprenticeship provision in the Welsh Government Budget. The Centre for Economics and Business Research recent analysis<sup>1</sup> shows the Impact of Apprenticeship Funding Cuts in Wales:

- Nearly 6,000 fewer apprenticeship starts in Wales this year
- A £50.3 million 'short run' impact on the economy (measured in terms of Gross Value Added)
- The health and social care sectors being impacted the most, making up around 2,500 of the total drop in starts.
- Funding cuts disproportionately affecting the most deprived within the Welsh population.

Recruitment has slowed and staffing efficiencies have been made. Demand for apprenticeships continues to be high, from both learners and employers. Any further funding reductions will immediately undermine support for our anchor companies and SMEs, as well as putting future inward investment opportunities at risk. SMEs accounted for 62.4% of employment and 37.9% of turnover in 2019 in Wales.<sup>2</sup> Protecting the apprenticeship and part-time learning budgets are essential to ensuring employers can upskill their workforce and grow their businesses, as well as the positive impacts that apprenticeships have on learners.

The move from financial year funding to academic year funding has been welcomed, however it was suggested that bigger pots of funding to cover various different projects over a longer time frame would potentially generate better value for money in the longer term – for example, it would be easier to hire specialist staff to run a project for a three year period, rather than a six month period.

## 3. How financially prepared is your organisation for the 2025-26 financial year, how will inflation impact on your ability to deliver planned objectives, and how robust is your ability to plan for future years?

---

<sup>1</sup> [ColegauCymru warns of devastating impact of apprenticeship funding cuts](#)

<sup>2</sup> <https://www.fsb.org.uk/resource-report/building-business.html>

FE colleges directly support businesses more than any other form of education through programmes such as apprenticeships and Personal Learning Accounts (PLA). We welcome the UK Government's extension of the UK Shared Prosperity Fund for one year as a transitional arrangement, but are concerned that this is at a reduced level for another year with £900 million of funding, meaning far less support available to businesses through FE in 2025/26.

It is incredibly difficult for the sector to plan for the long term when so much is uncertain. Colleges generally have robust finances, and have already made significant savings to meet the challenging fiscal environment. A number of colleges have embarked on major construction projects – to which they have to make a financial contribution – and these plans are built on the expectation that funding is stable. Any reductions in funding could put at risk the needed modernisation of campuses across Wales, which would result in a poorer experience for learners from the most disadvantaged communities.

A strong apprenticeships programme is key to ensuring that the Welsh Government can achieve its ambition for a stronger, greener, fairer Wales. However, providers are reporting considerable pressure as a result of the budget cuts to apprenticeships which is having a direct impact on their capacity to meet the needs of learners on key programmes. In particular, providers are reporting high demand that they cannot meet in sectors such as construction and health and social care. These sectors are critical to the foundational economy.

Apprenticeships can and should be at the heart of both the Welsh and UK Government plans for growth and opportunity. To deliver them will require moving towards a restoration of lost funding so that the capacity can respond effectively to demand from employers and learners. Recent research<sup>3</sup> jointly commissioned by ColegauCymru and the National Training Federation for Wales measured the impact of the Welsh Government's budget decisions last year, which have led to 5,750 fewer apprenticeships in Wales. The key findings are:

- **Total Economic Loss:** Combining short-term and long-term impacts, the total loss ranges from £158.8 million to £215.7 million.
- **Industry-Specific Impact:** The Health sector is the most affected, with losses up to £66 million. Professional Services and Construction seeing significant losses, with construction facing up to £42.5 million in losses. Manufacturing is the least affected, with losses of around £6.7 million.
- **Impact by Deprivation Decile:** Most Deprived Deciles: The bottom 40% of the population will experience the highest GVA loss, highlighting the disproportionate impact on the most vulnerable groups.
- **Healthcare Apprenticeships:** Potential reduction of 2,613 apprenticeships, exacerbating existing workforce shortages and impacting NHS service delivery.

---

<sup>3</sup> [ColegauCymru warns of devastating impact of apprenticeship funding cuts](#)

- **Construction Apprenticeships:** Estimated reduction of 565 apprenticeships, leading to a significant GVA loss and worsening workforce shortages in the construction industry.

Also, a recent report from the owner of Screwfix and B&Q, Kingfisher Plc, showed that the UK is set to lose out on £98billion of growth by 2030 due to a shortage of tradespeople<sup>4</sup>. Colleges are central to delivering these skilled tradespeople. Ultimately, the availability of skills plays a pivotal role in the prosperity of Wales' economy and communities, and its attractiveness to investors. In order to drive inward investment, it is critical that skills are the central pillar to that plan.

One other key factor to consider is the potential impact in the increase in employer national insurance contributions as a result of the UK Government budget. This will add significant in-year staffing costs and it is essential that further education is given sufficient additional funding to help mitigate any impact.

#### 4. Cost of living a) What action should the Welsh Government take to help households cope with inflation and cost of living issues. How should the Budget address the needs of people living in urban, post-industrial and rural communities and in supporting economies within those communities?

Public transport in parts of Wales has been described by some colleges as unreliable and costly, which makes transport for learners to both college and places of work for apprentices, very difficult. Pembrokeshire College has spoken about an apprentice who needs to take two buses to reach their place of work, fares which total £9. Once he had purchased lunch for the day his total spend has reached £13, however with the apprenticeship wage being £5.28 per hour, he will have to work two and a half hours before he has any money to take home. Some areas have already seen many bus routes cancelled, for example the Fflecsi Bwcabws in Ceredigion, which was EU funded. With routes in smaller, rural areas being cancelled or withdrawn all together, learners have no equality of access to transport, meaning no parity between those in rural and those in urban areas.

Pressure on the cost and reliability of learner travel is therefore increasing, in part driven by cost pressures on local authorities This is a complex area and provision will vary between local authorities, but all colleges are seeing increasing pressure both in terms of transporting learners to college and also, where required, to work placements that are part of a programme of study.

The Financial Contingency Fund is provided to colleges by the Welsh Government who then means-tested support for learners. It is there to support those who are in most financial need. The fund is allocated based on the number of full-time learners enrolled at each college, and discretion is given to colleges to use the fund as they see fit. In 2021/22, the largest sum of money across the sector was allocated to learner transport. This is echoed by Welsh Government research from March 2023, which recognised that 41% of 16 to 24 years olds identified transport

---

<sup>4</sup> [UK to lose out on £98bn of growth by 2030 due to shortage of tradespeople \(kingfisher.com\)](https://www.kingfisher.com/uk-to-lose-out-on-98bn-of-growth-by-2030-due-to-shortage-of-tradespeople)

as being the number one barrier to getting a new course, training or a job<sup>5</sup>. ColegauCymru understands that the Welsh Government's Cabinet Secretary for Transport and North Wales is due to convene a Learner Travel Summit in the coming months, and this is to be welcomed. Additional funding into the Financial Contingency Fund will give colleges the resources and the flexibility they need to respond to the needs of learners in their communities. It is essential that additional resource is provided both for 2024/5 and 2025/6 to help reflect the increase in learners and the increase in additional support they require.

### Cost of living b) Is enough being done to tackle the rising costs of living and support those people living in relative income poverty?

The FE and WBL sectors in Wales generally support a higher percentage of learners from disadvantaged backgrounds compared to Higher Education (HE) and school Sixth forms, through various learning pathways such as vocational lower level provision, Adult Community Learning, and apprenticeships. Therefore, any reduction to college and WBL budgets is likely to have a disproportionate impact on individuals from the most deprived areas of Wales. The most recent figures show that of the 98,175 learners (both full-time and part-time) enrolled at FE institutions from August 2021 to July 2022, 13% were from the most deprived 10% of neighbourhoods in Wales. This is compared to 8% of the 23,375 Sixth form students registered at schools in Wales.

Further crucial support is available to college learners via the Financial Contingency Fund (FCF) which is critical for colleges to flexibly use to meet the support needs of their learners. Over 8% (3,666) of full-time FE learners aged 16-18 utilized financial contingency funding for free meal vouchers, with a further 748 learners in the 19+ age bracket, bringing the total number of learners who relied on the FCF in order to eat during the college day to almost 10% (4,414). Colleges noted that it is not only those learners from lower socio-economic backgrounds struggling with the cost of living, but now those middle earners are also facing financial hardship. As with the Education Maintenance Allowance (EMA), ColegauCymru suggests that eligibility for receiving support from the FCF is also reviewed in order to support all learners who are facing financial difficulty.

The FCF does not only provide learners with free meals during term time, but also during holidays. Data gathered by the Welsh Government from the five holidays (not including the summer holiday) during 2022/23 showed that an average of 3,322 learners benefitted from free meals. These figures emphasise the vital role colleges are playing in supporting young people, not just during the college day, but also outside of term time.

### 5. Are Welsh Government plans to build a greener economy clear and sufficiently ambitious? Do you think there is enough investment being targeted at tackling the climate change and nature emergency? Are there any potential skill gaps that need to be addressed to achieve these plans?

---

<sup>5</sup> [Young Person's Guarantee National Conversation: update for participants](#) – Welsh Government

As noted by the Welsh Government in the “Stronger, Greener, Fairer Wales: Net Zero Skills Action Plan”, skills will be a key enabler as we transition to a net zero economy<sup>6</sup>, therefore investment is crucial to ensure that no one is left behind. As we adjust our economy towards the net zero goals, these existing and emerging jobs require different skills. Without a suitably trained workforce, the transition will be impossible. This includes key sectors like renewable energy, energy and resource efficiency, renovation of buildings, construction, environmental services and manufacturing.

A great example of this is RWE, one of the world’s leading offshore wind companies, and the UK’s leading power generator, recently recruited its biggest-ever cohort of wind turbine technician apprentices to serve on its growing fleet of offshore wind farms. The group of 16 apprentices will study at Grŵp Llandrillo Menai’s recently opened, state-of-the-art, engineering training site in Rhyl, North Wales. This latest intake brings the total number who have started the course to more than 100.

Any reduction in funding for FE and WBL will severely undermine our drive towards net zero and our ability as a nation to be able to attract the kind of investment that we need for the future. Long-term we need to take a more strategic view of the skill needs for the transition to net zero and ensure that it is resourced so that people can retrain and upskill for the jobs of the future. Cuts to apprenticeships and reductions in the opportunities to access Personal Learning Accounts will only risk the progress we need to make in reaching our targets and in contributing to the global effort to tackle climate change.

6. Is the Welsh Government’s approach to preventative spending represented in resource allocations (Preventative spending = spending which focuses on preventing problems and eases future demand on services by intervening early).

Analysis of data from the OECD / World Bank (1995-2015)<sup>7</sup> identifies patterns between education and health indicators. Adults with higher educational attainment have better health and lifespans than their less educated peers. Tertiary education in particular, is critical in influencing infant mortality, life expectancy, and child vaccination. Education and wellbeing are intrinsically linked. The evidence behind the importance of education as a determinant of health is among the most compelling. Education is strongly associated with life expectancy, morbidity, health behaviors, and educational attainment plays an important role in health by shaping opportunities, employment and income<sup>8</sup>. The Chief Medical Officer for Wales’ Annual Report highlights the disproportionate health effects that the cost of living crisis has had on low income people, and

---

<sup>6</sup> [Stronger, Greener, Fairer Wales: Net Zero Skills Action Plan](#) – Welsh Government

<sup>7</sup> [The influence of education on health: an empirical assessment of OECD countries for the period 1995–2015 | Archives of Public Health | Full Text \(biomedcentral.com\)](#)

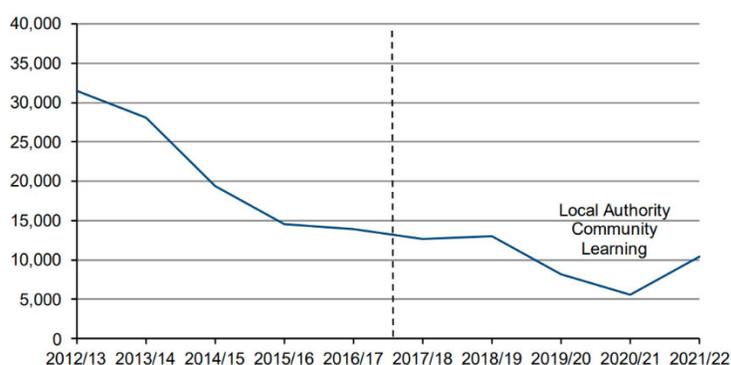
<sup>8</sup> [Education: a neglected social determinant of health - The Lancet Public Health](#)

critically, recommends that the Welsh Government should continue investment in ‘interventions that address upstream determinants’, including education.

A decade ago, the budgets for part-time and adult community learning were slashed<sup>9</sup>. Since then, as recognised by Audit Wales, part time students have been particularly affected by the pandemic – especially those in adult community learning<sup>10</sup>. In 2021, Audit Wales highlighted that “Decisions on the level of provision in future will need to take account of the Welsh Government’s aspirations for lifelong learning and creating flexible learning pathways that enable individuals to acquire new skills in a way that suits their personal circumstances”<sup>11</sup>.

The long term decreased trend in adult learning can be linked to reductions in public funding<sup>12</sup>. There is considerable research in place which demonstrates the value of adult learning in Wales, both in the community and within a college setting, and the positive difference this makes to people’s lives<sup>13</sup>.

Chart 2f: Learners in adult learning, 2012/13 to 2021/22 [note 1]



Lifelong learning supports the development of skills, improves health and wellbeing and is a catalyst for social engagement and integration. ACL is essential for those individuals who are hardest to reach, and furthest away from education and employment.

In respect of colleges’ delivery of skills-based programmes such as PLAs and apprenticeships, and employability programmes such as Jobs Growth Wales Plus (JGW+) this has been the case to-date. However, the college network is facing huge budget pressures. If the Welsh Government is serious about preventative spending, to avoid greater issues in the future, then it must ensure that all demand (from individuals, employers, and/or the economy) is met.

The skills-based training that colleges deliver is demand-led, and as such, so should Welsh Government’s funding in this area i.e. if there is demand, it must be met.

## 7. How should the Budget support young people?

<sup>9</sup> [Criticism over cuts to adult learning budgets in Wales - BBC News](#)

<sup>10</sup> [A Picture of Higher and Further Education \(audit.wales\)](#)

<sup>11</sup> [A Picture of Higher and Further Education \(audit.wales\)](#)

<sup>12</sup> [Further Education, Work-based Learning and Adult Learning in Wales, 2021/22 \(gov.wales\)](#)

<sup>13</sup> [Adult learning briefing ENG.pdf \(colleges.wales\)](#)

What are the key opportunities for the Welsh Government to invest in supporting an economy and public services that better deliver against the well-being goals in the Well-being of Future Generations (Wales) Act 2015?

Colleges across Wales are making a significant contribution towards Wales wellbeing goals, as evidenced in the Demonstrating the Social Value of Further Education Colleges report<sup>14</sup>.

**ALN** - The roll out of the Additional Learning Needs (ALN) legislation, ColegauCymru has worked with the sector to establish the true cost of ALNET changes to FE institutions. This has involved each of the colleges providing time and cost details per learner for staff activity that would not have been required before ALN Implementation. This activity includes:

- Increased workload associated with transition events and activities
- Attending school reviews to ensure additional learning provision (ALP) needs are interpreted effectively for an FEI environment
- Requesting, obtaining and scrutinising learner information
- Increased numbers of meetings with prospective learners to adjust ALP and the individual development plan (IDP) before and after they start college
- Additional correspondence required to meet ALNET duties
- Organising and delivering person-centred meetings to include stakeholders as learner consent allows
- Administration of the electronic IDP systems and managing data required for evaluation and reviews.

ColegauCymru has collated and summarised this data in the table below. This provides actual additional spending based on three epidemiology scenarios: ALN cohorts of 5%, 10% and 15% of full-time learners. These costs relate only to additional ALN activity.

Year Cost @5% ALN Cost	@ 10% ALN Cost	@ 15% ALN Cost
2025/26 £2,089,663	£4,094,327	£6,098,99

**Mental Health and Wellbeing** - It is vital that the ongoing costs of providing support for mental health and wellbeing are recognised and supported as part of the budget. The level of demand remains far higher than before the pandemic and funding for mental health and wellbeing services will need to be part of core budgets into the future.

For example, since the 1970s Slovenia has promoted regular activity among its population, resulting in healthier and more economically active adults. This ethos has supported its growth over recent decades. Young people aged 6 to 19 undergo mandatory national annual fitness testing, the data from which is used to inform public policy and national health and education

---

<sup>14</sup> [Demonstrating the Social Value of FE colleges in Wales - Full Report Eng.pdf](#)

strategies. The tests, supported by dedicated PE lessons from primary age, have resulted in a culture of physical activity that is taken into adulthood.<sup>15</sup>

This example shows how it is essential that the role of colleges as part of the broader support system for young people is recognised and adequately funded. We need to see more emphasis on active wellbeing and its positive effects for good mental health in the education sector before it can truly become a way of life.

All FE Colleges involved in the Welsh Government funded Mental Health project gathered the following data on wellbeing and safeguarding referrals. This illustrates a significant percentage increase, year on year since the beginning of the Pandemic:

	19/20	20/21	21/22	22/23
<b>Total Wellbeing Referrals</b>	<b>6,454</b>	<b>7,565</b>	<b>12,152</b>	<b>15,824</b>
<b>Total Safeguarding Referrals</b>	<b>2002</b>	<b>2844</b>	<b>3838</b>	<b>6614</b>
<b>Total</b>	<b>8,456</b>	<b>10,409</b>	<b>15,990</b>	<b>22,438</b>
<b>Percentage increase on prev. year</b>		<b>23%</b>	<b>54%</b>	<b>40%</b>

**Attendance and attainment** - The challenges of school attendance and attainment are well known and understood but the solutions are often seen too simplistically as sitting only within the pre-16 system. There is strong evidence from existing college programmes for pre-16 learners that access to college based provision, in particular vocational education and training, can be more effective in supporting young people who are disengaged from school. Estyn’s review of the Junior Apprenticeship programme demonstrates this model delivers a range of positive impacts including: improved levels of engagement and attendance; very high success rates in vocational qualifications offered; strong positive learner feedback; and strong progression rates into FE and training.<sup>16</sup>

Colleges can be a part of the solution by offering an engaging curriculum for disengaged young people, potentially providing them with the chance to undertake practical, vocational courses and offering them a pathway into post-16 education and training. This already happens in many parts of Wales but the offer is normally limited in scope and is certainly not universal across every part of the country.

While we recognise that public finances are tight we believe there is a case for positive, additional investment in FE to help schools improve learner attendance, attainment and progression, as well as learner health and wellbeing.

<sup>15</sup> <https://pmc.ncbi.nlm.nih.gov/articles/PMC9486162/>

<sup>16</sup> <https://www.estyn.gov.wales/system/files/2024-05/A%20review%20of%20the%20junior%20apprenticeship%20programme%20in%20Wales.pdf>

## Investing in education – for today's and for future generations

We must avoid a situation where any funding reductions significantly undermine capacity to deliver for learners and for employers as they face the challenges of the future. There is no route map to a better Wales that doesn't rely on a thriving, resilient and successful FE and WBL sector.

The 13 FE institutions in Wales offer high quality vocational, technical and academic education to people of all ages. College lecturers have often come into teaching after a successful career in their industries, which means learners are taught to demonstrate industry-level skill levels and behaviours. Colleges' industry standard facilities provide the high quality environment our learners deserve.

We must protect the core curriculum, and the support for our learners. This is how we future-proof Wales' economy. If we do not invest now, we will feel the effects in a decade's time, which will be too late for our learners.

**Clare Williams**

**Policy Officer, ColegauCymru,**

# Agenda Item 4.2

Jane Hutt AS/MS  
Ysgrifennydd y Cabinet dros Addysg  
Cabinet Secretary for Education

Jane Hutt AS/MS  
Ysgrifennydd y Cabinet dros Gyfiawnder Cymdeithasol, y  
Trefnydd a'r Prif Chwip

Ein cyf/Our ref JH/PO/358/24

Jenny Rathbone MS  
Chair, Equality and Social Justice Committee



Llywodraeth Cymru  
Welsh Government

29 November 2024

Dear Jenny,

Thank you for your letter dated 11<sup>th</sup> November in respect of the decision taken by Qualifications Wales to suspend the development of the British Sign Language (BSL) GCSE in Wales.

It is important to clarify that Qualifications Wales is an independent statutory body, established as a regulator through legislation in the Qualifications Wales Act 2015, with their strategic direction set and activities overseen by a publicly appointed board. Qualifications Wales has additional powers to commission new qualifications and to restrict the range of qualifications offered. Qualifications Wales have therefore led the *Qualified for the Future* programme to reform 14-16 qualifications. It is the responsibility of Qualifications Wales, making decisions through their board, to decide whether and when any new qualifications should be introduced. These decisions are not taken by the Welsh Government or Ministers.

Welsh Government remains committed to supporting BSL and to furthering the use, knowledge and expertise of the language in Wales. It is our intention to design and develop policy which delivers the greatest positive impact for the BSL signing community of Wales, making provisions to promote and facilitate the use of BSL and its tactile forms and removing existing language barriers. We believe we can achieve a greater and quicker impact by taking a collaborative and inclusive approach and I thank both the National Deaf Children's Society Cymru and Signature for engaging with officials as they continue to help inform policy developments.

Wales is rightfully proud to be the first part of the UK to include BSL in its curriculum alongside English, Welsh and other languages. We have worked with BSL practitioners and other experts, including members of the Deaf community to develop guidance on designing a curriculum which includes progression in BSL for BSL signers as well as guidance for schools choosing to introduce BSL as a second, third or subsequent language.

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:  
0300 0604400

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

[Gohebiaeth.Lynne.Neagle@llyw.cymru](mailto:Gohebiaeth.Lynne.Neagle@llyw.cymru)  
[Correspondence.Lynne.Neagle@gov.wales](mailto:Correspondence.Lynne.Neagle@gov.wales)

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

In this context, Qualifications Wales took a different approach to developing a made-for-Wales GCSE BSL than for other GCSE subjects that will form the new suite of 14-16 National Qualifications, allowing more time to engage effectively with key stakeholders. Through this research and engagement, they determined that the GCSE should be aimed at learners who are learning BSL for the first time. While this decision would not have precluded deaf learners who primarily communicate via BSL from entering the GCSE (as is the case for learners taking a modern foreign language GCSE in their home language) they were not the target cohort. A similar decision to design the qualification for learners who are learning BSL for the first time has been made in England for the GCSE being developed there.

We know the decision to suspend the development of the BSL GCSE was a difficult one for the Qualifications Wales Board. Qualifications Wales have made clear, however, that their recently confirmed policy on the designation of qualifications outside of the 14-16 National Qualifications suite will continue to allow the existing range of qualifications available to deaf children offered by the awarding body Signature to remain, including those qualifications that are similar to the GCSE. On average, 19 learners per year have taken these qualifications in Wales over each of the last six years.

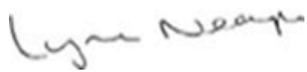
Qualifications Wales will also continue to develop BSL units as part of the new Skills Suite qualification, aimed at learners who are learning BSL for the first time and which will be available from 2027. Through this new qualification, learners will have the opportunity to be able to develop their practical BSL communication skills for social interaction in everyday settings. The BSL units (from entry level to level 2) will offer an engaging way for learners to demonstrate their BSL skills. The units will be more manageable for schools than a full GCSE and lend themselves to peripatetic teaching, making good use of the existing teacher workforce.

This approach will allow Qualifications Wales to monitor the take-up of these units and, over time, consider whether the 14-16 qualifications offer should be further expanded, which could include a made-for-Wales BSL GCSE. Prior to that, Qualifications Wales will be able to make available to Welsh schools and learners the BSL GCSE currently being developed in England by Ofqual, so that a BSL GCSE is available to English and Welsh learners at the same time.

We do, however, understand the disappointment at the decision to suspend the development of made-for-Wales BSL GCSE. During the development process where Qualifications Wales worked with stakeholders including the British Deaf Association, Wales Council for Deaf People, academics in sign language and deaf studies, practitioner representatives and providers of deaf awareness training and BSL support in Wales, they identified a number of complexities and delivery challenges that needed to be addressed to make the new qualification a success. This included the lack of an official online repository or 'dictionary' for BSL in Wales; the lack of a qualified teaching workforce for BSL; and the risk identified through their ongoing engagement with the sector that no, or very few, schools would initially offer the new BSL GCSE, which would make it technically and economically unviable. These are challenges which they judged to present significant risks to the successful delivery of the proposed qualification, and against which Welsh Government was unable to provide sufficient assurance based on its current capacity and resources.

From September 2027, there will be an expanded and enhanced range of 14-16 BSL qualifications available to both hearing and deaf learners, supporting BSL within the Curriculum for Wales and helping to make education in Wales more inclusive. These new qualifications have the potential to spark interest and take-up amongst learners, to foster and demonstrate the demand from schools for BSL qualifications and to help grow the use and understanding of BSL in Wales.

Yours sincerely



**Lynne Neagle AS/MS**

Ysgrifennydd y Cabinet dros Addysg  
Cabinet Secretary for Education



**Jane Hutt AS/MS**

Ysgrifennydd y Cabinet dros dros Gyfiawnder Cymdeithasol, y Trefnydd a'r Prif Chwip  
Cabinet Secretary for Social Justice, Trefnydd and Chief Whip

**Y Pwyllgor Cydraddoldeb  
a Chyfiawnder Cymdeithasol**

**Equality and Social Justice  
Committee**

Lynne Neagle MS,  
Cabinet Secretary for Education

Jane Hutt MS, Cabinet Secretary for Social  
Justice, Trefnydd and Chief Whip

**Senedd Cymru**  
Bae Caerdydd, Caerdydd, CF99 1SN  
SeneddCydraddoldeb@senedd.cymru  
senedd.cymru/SeneddCydraddoldeb  
0300 200 6565

**Welsh Parliament**  
Cardiff Bay, Cardiff, CF99 1SN  
SeneddEquality@senedd.wales  
senedd.wales/SeneddEquality  
0300 200 6565

11 November 2024

Dear Lynne and Jane,

In our meeting on 14 October, we considered a letter from National Deaf Children's Society Cymru sent to you and copied for our attention. We write to express our disappointment with the decision to suspend the development of the Made for Wales British Sign Language (BSL) GCSE and seek clarity about why this decision was taken.

The development of the BSL GCSE in Wales is considered a positive step forward in terms of equality and ensuring that education in Wales is more inclusive. It is considered an important development, not only for pupils to be able to gain a qualification in their own language, but also in terms of raising awareness and understanding and improving the skills of the future workforce.

We support the NDCS's call for this to be considered further. We would like more information on the challenges cited as the reasons for the decision so this can be explored with them and other stakeholders who have been campaigning and working to make this a reality.

We would appreciate clarity on the reasoning and challenges which have arisen and what actions have been considered to overcome these issues. We look forward to receiving your response in advance of the Committee's scrutiny session with Jane on Disability and Employment on November 25<sup>th</sup>.

Yours sincerely,

A handwritten signature in black ink, reading "Jenny Rathbone". The signature is written in a cursive style with a large, prominent 'J' and 'R'.

Jenny Rathbone MS

Chair of the Equality and Social Justice Committee

Senedd Cymru/Welsh Parliament



# Agenda Item 4.3

Dr Chris Llewelyn

Prif Weithredwr / Chief Executive

Cymdeithas Llywodraeth Leol Cymru  
Welsh Local Government Association

Un Rhodfa'r Gamlas

Heol Dumballs

Caerdydd

CF10 5BF

Ffôn: 029 2046 8600

One Canal Parade

Dumballs Road

Cardiff

CF10 5BF

Tel: 029 2046 8600

Ein Cyf / Our Ref: AM/ESJC

Dyddiad / Date: 2 December 2024

Gofynnwch am / Please ask for: Luke Nicholas

Ebost / Email: luke.nicholas@wlga.gov.uk

Jenny Rathbone MS  
Chair, Equality and Social Justice Committee  
Senedd Cymru

Dear Jenny,

## **Inquiry into the Disability Employment Gap**

Many thanks for your letter regarding the Equality and Social Justice Committee's inquiry into the disability employment gap. On behalf of the Welsh Local Government Association (WLGA) I'm keen to respond to the points raised by the committee.

Our understanding is that in the broader picture, all 22 local authorities have a genuine and active commitment to widening participation in their workforces from underrepresented groups in our society, across all equalities considerations including disability. While as Leader I cannot speak for specific authorities, I understand that a generally positive approach has been embedded across local government in Wales, which strives towards continuous improvement on disability and employment with all councils achieving Disability Confident status.

In October 2024, local government HR directors and relevant Cabinet Members for workforce received a presentation by Terry Mills at the Joint Council for Wales meeting, a social partnership structure that brings together our local government employers and trades unions. The presentation was well received and stimulated discussion regarding current practice. All councils took away key messages including the need to deepen and accelerate progress on disability employment, and as a sector we will be looking to continue to work individually and collectively through

professional networks and the Joint Council for Wales to support improvements to practice.

In his discussions with your committee, Terry Mills was right to indicate that Disability Confident Leader status has only been attained by Pembrokeshire County Council, while all other local authorities have reached either stage one or two of the scheme. The WLGA will explore with councils their future ambitions and intentions with regards the Disability Confident scheme, which I anticipate will have renewed interest following the presentation at the Joint Council for Wales.

It will come as no surprise that resources and capacity can be a key obstacle for councils wishing to progress to level three of the scheme. The current priority remains the need to recruit from as wide a pool as possible to meet our future workforce challenges, address skills shortages, and retain talent at a time of constrained budgets and annual rounds of service cuts enforced on us by the wider financial situation.

Councils recognise and value the diversity that exists within the labour market and continue to actively recruit from this diverse pool, working locally to provide opportunities to attract and develop talent, so that our workforce is representative of the community it serves.

However, as Leader of the WLGA I would be keen to support efforts to enable councils to become Disability Confident Leaders. As a next step I intend to share this correspondence with WLGA and local government colleagues, so that we can create further momentum regarding the Disability Confident scheme and collectively work towards understanding what the opportunities and challenges are with regards progression to Leader status.

Yours sincerely,



**Councillor Andrew Morgan OBE**  
WLGA Leader

18<sup>th</sup> November 2024

Dear Councillor Morgan,

## Inquiry into the disability employment gap

The Equality and Social Justice Committee is undertaking an inquiry into the disability employment gap. We are exploring what progress has been made and what more could be done to reduce and remove barriers to employment faced by disabled people. The **terms of reference** for the inquiry can be found on our web page.

When considering the role of local authorities as major employers, Terry Mills, Disabled People's Employment Champion, informed us that Pembrokeshire County Council is currently the only local authority which has Disability Confident Leader status. The Disability Confident Leader status is considered an important kitemark of the commitment of an organisation to disabled employees. In contrast, we heard from Andrea Wayman, Elite Support Employment and others that levels 1 and 2 of the Disability Confident scheme are limited and potentially less robust.

We would appreciate it if you could inform the Committee about any work or developments taking place across Wales to support and encourage local authorities to do more to recruit and support disabled people to become and remain employees. We are also interested in whether other local authorities can be encouraged to achieve Disability Confident Leader status and if not whether there are any barriers to achieve this.

It would be appreciated if we could receive your response before the 2<sup>nd</sup> December 2024.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Jenny Rathbone'. The signature is fluid and cursive, with the first name 'Jenny' written in a larger, more prominent script than the surname 'Rathbone'.

Jenny Rathbone MS

**Chair, Equality and Social Justice Committee**

Croesewir gohebiaeth yn Gymraeg neu Saesneg.

We welcome correspondence in Welsh or English.





Jenny Rathbone MS

Chair, Equality & Social Justice Committee

By email

25<sup>th</sup> of November 2024

Dear Jenny,

Thank you for your letter dated 15<sup>th</sup> October 2024, seeking an update on recommendations in the SEHR report relating to collaboration between the Welsh Government, Equality and Human Rights Commission and my office.

I fully support the recommendations contained within the report: including the recommendation for my team and I to work with EHRC to examine opportunities to enhance communication and share intelligence on issues relating to equality and human rights, including protocols for data sharing; and to coordinate actions using existing powers to hold the Welsh Government and public authorities to account.

I include here a summary of some of the action we have taken in line with this recommendation. Some of the actions pre-date the report and are included for context.

To help integration of the equality and well-being duties as well as to support the implementation of the new socio-economic, we worked jointly with the Welsh Government and EHRC in 2021 to produce *A More Equal Wales: mapping guide*. The Toolkit is designed to help public bodies apply the three sets of duties in an aligned way.

One of the key projects we have successfully partnered on in relation to this recommendation has focussed on integrated impact assessments. A series of workshops were organised by Welsh Government earlier this year to create a community of practice. This has been attended by members of my team, including our Deputy Commissioner. My office is now working on supporting this network and exploring, with others including the EHRC, how we can improve the integration of impact assessments and the improvement of their quality in general. We will convene two workshops in the new year which will include Welsh Government and EHRC.

---

Comisiynydd Cenedlaethau'r Dyfodol Cymru  
Tramshed Tech, Heol Pendyris  
Caerdydd, CF11 6BH  
[cystylltwchani@cenedlaethaurdyfodol.cymru](mailto:cystylltwchani@cenedlaethaurdyfodol.cymru)  
[cenedlaethaurdyfodol.cymru](http://cenedlaethaurdyfodol.cymru)

---

Future Generations Commissioner for Wales  
Tramshed Tech, Pendyris Street  
Cardiff, CF11 6BH  
[contactus@futuregenerations.wales](mailto:contactus@futuregenerations.wales)  
[futuregenerations.wales](http://futuregenerations.wales)

My Deputy Commissioner has also attended meetings of the Welsh Government's Human Rights Advisory Group which also includes the EHRC and is being kept informed of the development of the group. We commented on the draft Terms of Reference of the group to ensure it integrated well with the Well-being of Future Generations Act. I understand that the group hasn't met since February 2024 due to changes within Welsh Government that have taken place since then and expect to hear shortly of the next date.

My team are part of discussions alongside EHRC with the Budget Improvement and Impact Advisory Group (BIAG) set up by the Welsh Treasury to provide advice as they prepare the Welsh Government's budget.

Over recent months, my team and I have focussed on strengthening our relationship and collaboration with the EHRC in order to deliver my strategy Cymru Can. We have held a series of meetings to scope a joint programme of work we would like to take forward in the future. Areas of planned and potential future collaboration include the following;

- input from EHRC in drafting the 2025 Future Generations Report to ensure alignment and to reinforce our respective work - we have already held a session with EHRC to shape the drafting of recommendations around a More Equal Wales goal and have invited further input from them during the next phase of involvement;
- collaboration on working with public bodies on how to improve their involvement with people affected by inequalities, in particular from an intersectional point of view, and the need for equality and inclusion best practice to move beyond projects and into 'business as usual'
- Artificial Intelligence is a feature in both our strategies and there is potential to work together on that subject;
- The potential to work together to highlight lack of progress on tackling entrenched inequality in Wales, in line with the 10<sup>th</sup> anniversary of the Well-being of Future Generations Act next year;
- EHRC have identified a role for themselves in countering polarisation and we have discussed how we could collaborate in future on this;
- The potential for us to work with the UK EHRC Board on how an approach that focuses on future trends provides a useful lens for their own work.

Finally, despite capacity constraints, I want to assure the Committee that I am ensuring equality, diversity and inclusion is at the core of delivering my strategy [Cymru Can](#).

I hope the Committee finds this update useful. Please let me know if you require further information.

Yours sincerely,



Derek Walker

Future Generations Commissioner for Wales

Derek Walker  
Future Generations Commissioner for Wales

15 October 2024

Dear Derek,

### Strengthening and Advancing Equality and Human Rights in Wales

In May 2022, the Welsh Government set out five action areas that addressed all the accepted recommendations of the [SAEHR report](#). One of these recommendations emphasised the need to strengthen relationships and collaboration between government, the Equality and Human Rights Commission, Future Generations Commissioner and Law Society in promoting the human rights agenda.

In light of the above we would welcome an update from you on the recommendations relating to collaboration between the Welsh Government and Future Generations Commissioner, including any specific details of any action taken.

We have also enclosed a copy of the latest correspondence to the Welsh Government which provides more context to our work in this area.

We look forward to hearing from you.

Yours sincerely,



Jenny Rathbone MS  
Chair, Equality and Social Justice Committee





Jenny Rathbone MS  
Chair, Equality and Social Justice Committee  
Welsh Parliament  
Cardiff Bay, Cardiff  
CF99 1SN

Jenny Rathbone AS  
Cadeirydd, y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol  
Senedd Cymru  
Bae Caerdydd, Caerdydd  
CF99 1SN

21 November 2024

Dear Jenny,

**Re: Strengthening and Advancing Equality and Human Rights in Wales**

Thank you for your letter of the 15th of October seeking an update regarding the recommendations of the SAEHR Report.

As an England and Wales organisation, The Law Society takes human rights very seriously and undertakes a wide range of work that both supports and promotes human rights, both in the UK and abroad. Below are a few examples of our work on human rights over the last 12 months. Further details of this work can be accessed by clicking on the links.

- [Rwanda asylum partnership](#)
- [Human Rights](#)
- [Illegal Migration Act](#)

As the Wales office of The Law Society, and as the wider organisational work above proves, we very much support the overarching aims and principles set out in the SAEHR report and we are very happy to be involved in discussions with Welsh Government and the numerous other wider stakeholders who have an interest in human rights in Wales.

However, as was repeatedly pointed out to Professor Simon Hoffman and Dr Sarah Nason, the authors of the SAEHR report, at the point the final draft was circulated to us for comment, the Wales Office of The Law Society have neither the staffing resource, finances or human rights expertise within the team to be in a leadership position to drive a strengthening of relationships and increased and ongoing collaboration with Welsh Government, the Equality and Human Rights Commission, Future Generations Commissioner around the human rights agenda.

Any such Law Society Wales office based human rights work programme, which would be separate from and in addition to the work undertaken in London and our already set and budgeted local priorities and work programme, would place a significantly increased burden of work on a Wales office that consists of only four members of staff.

We worked closely and collaboratively with Welsh Government officials to ensure our request to the report authors that the recommendation that specifically mentions The Law Society should be amended to reflect this.

As a result, Welsh Government very kindly arranged a meeting between myself and the report authors where I set out my reasons for seeking the change to the recommendation.

The reasoning behind asking for the specific naming of The Law Society Wales office to be withdrawn at the draft stage were as set out below: -

1. The Law Society Wales office is a part of a wider independent organisation that receives no public funding in Wales and is of limited staff capacity.
2. As the Wales office of an independent organisation, we set our own priorities and work programme according to the needs and views of our members in Wales and in accordance with the wider organisational business plan. These priorities are ours and ours alone to set and resource and are not for the report authors or any other external agency to dictate.
3. We do not feel it is right, or within the purview of the SAEHR report authors to specifically name us, alongside Welsh Government, the Equality and Human Rights Commission and the Future Generations Commissioner as a body that should have a specific responsibility for driving this advancement In Wales, whilst several other organisations who may also have a significant role and interest are not specifically named.
4. This is a matter that would benefit from contributions from the whole of the legal sector, including the Bar Council, university law schools, other legal education and training providers, and it should be driven and guided by those organisations with specific responsibilities in the area of human rights such as the EHRC, the Future Generations Commissioner for Wales and potentially Public Law Wales.
5. Following several attempts at explanation, the authors of the SAEHR report appear to have misunderstood the role, function, remit and capacity of The Law Society's work in Wales, as part of and within the wider Law Society organisation. In fact, the report refers several times to "The Law Society of Wales," an organisation that does not exist.

As an organisation we fully and actively support the strengthening and advancing of equality and human rights in many territories, including Wales and we are very happy to play our part in any future multi-agency discussions and programmes around how we can all contribute to that as a goal. However, as of today we have received no communication from either the Equality and Human Rights Commission or the Future Generations Commissioner in relation to any work that is being developed in this area.

Yours sincerely,



Jonathan Davies

**Head of Wales, The Law Society**

Law Society

15 October 2024

Dear Law Society,

### Strengthening and Advancing Equality and Human Rights in Wales

In May 2022, the Welsh Government set out five action areas that addressed all the accepted recommendations of the [SAEHR report](#). One of these recommendations emphasised the need to strengthen relationships and collaboration between government, the Equality and Human Rights Commission, Future Generations Commissioner and Law Society in promoting the human rights agenda.

In light of the above we would welcome an update from you on the recommendations relating to collaboration between the Welsh Government and the Law Society, including any specific details of any action taken.

We have also enclosed a copy of the latest correspondence to the Welsh Government which provides more context to our work in this area.

We look forward to hearing from you.

Yours sincerely,



Jenny Rathbone MS

Chair, Equality and Social Justice Committee



# Agenda Item 4.6



Comisiwn  
Cydraddoldeb a  
Hawliau Dynol

Equality and  
Human Rights  
Commission

## Jenny Rathbone MS

Chair, Equality and Social Justice

Committee

Senedd Cymru

Sent by email only

Our ref: 20241128 RathboneJ

Thursday 28 November 2024

Dear Jenny,

### Strengthening and Advancing Equality and Human Rights in Wales

I write in response to your letter of 15 October, following the evidence session on the Strengthening and advancing equality and human rights in Wales report. The Committee sought an update on collaboration between the Commission and the Welsh Government to promote human rights.

I attach a briefing which sets out our role as an A-status National Human Rights Institution, our work with the Welsh Government, and actions we have taken to promote human rights since the publication of the report.

---

Bydd y Comisiwn yn croesawu gohebiaeth yn y Gymraeg a'r Saesneg.

The Commission welcomes correspondence in Welsh or English.

**Ff/T:** 029 2044 7710

**E:** [correspondence@equalityhumanrights.com](mailto:correspondence@equalityhumanrights.com)

Tŷ'r Cwmnïau (Llawr 1af),  
Ffordd y Goron, Caerdydd, CF14 3UZ

Companies House (1st Floor),  
Crown Way, Cardiff, CF14 3UZ

[equalityhumanrights.com](http://equalityhumanrights.com)



I hope the Committee will find the briefing useful. Should you or Committee members have any further questions please do not hesitate to contact us.

Yours sincerely,

**Ruth Coombs**  
**Head of Wales**

---

Bydd y Comisiwn yn croesawu gohebiaeth yn y Gymraeg a'r Saesneg.

The Commission welcomes correspondence in Welsh or English.

**Ff/T:** 029 2044 7710

**E:** [correspondence@equalityhumanrights.com](mailto:correspondence@equalityhumanrights.com)

Tŷ'r Cwmnïau (Llawr 1af),  
Ffordd y Goron, Caerdydd, CF14 3UZ

Companies House (1st Floor),  
Crown Way, Cardiff, CF14 3UZ

[equalityhumanrights.com](http://equalityhumanrights.com)

---

# Briefing for the Senedd's Equality and Social Justice Committee

---

## The Equality and Human Rights Commission

The Equality and Human Rights Commission (EHRC) is an independent statutory body and A-status National Human Rights Institution. It has a mandate covering equality in Great Britain, human rights in England and Wales, and human rights in Scotland for issues reserved to the UK Parliament.

As an A-status National Human Rights Institution (NHRI) we are assessed against the [Paris Principles](#). They require NHRIs to:

- To be competent to promote and protect human rights
- To have a broad, clear constitutional and legislative mandate
- To submit advice on human rights issues to government and Parliament
- To cooperate with the United Nations and other international organisations to protect and promote human rights
- To promote education of human rights in schools, universities and professional circles
- To combat all forms of discrimination by increasing public awareness of human rights
- To ensure plural representation in its appointments
- To have adequate funding
- To be independent in its decision-making and operation

The Commission was last re-accredited as an A-status NHRI in May 2024.

---

# Collaboration with, and advice to the Welsh Government to promote human rights

The Equality Act 2006 places duties on the Commission to provide advice to governments on equality and human rights enactments.<sup>1</sup>

Since the publication of the Strengthening and advancing equality and human rights in Wales report (SAEHR) and commitments made in the Programme for Government, the Commission has been working with the Welsh Government as an observer on its Human Rights Advisory Group and Legislative Options Working Group. We have provided advice on taking forward the recommendations of the SAHER, in particular advising on steps to incorporate international human rights treaties into Welsh domestic legislation. The Commission supports the incorporating of international human rights treaties into domestic law, which would promote and strengthen human rights protections for people in Wales.

We have collaborated with the Welsh Government and partners on the development 'a statement of commitment to human rights' for Welsh public services. Additionally, we have committed to provide further advice to the Welsh Government on key principles for a human rights-based approach, which would underpin the statement.

Following the enactment of the Socio-economic duty by the Senedd in 2021, we collaborated with the Welsh Government and the Future Generations Commissioner on guidance for public bodies. The Mapping the duties guidance was prepared to support public bodies to consider the opportunities of applying the socio-economic duty, the public sector equality duty and the wellbeing duties in an aligned way.<sup>2</sup> The realisation of socio-economic rights, protection from discrimination and the wellbeing duties, and the sustainable development principles have important roles to play in the fulfilment of human rights.

As part of the process for finalising our reports to the UN on the UK's compliance with its international obligations, Welsh Government officials provide a factual check of our reports. This ensures that the information provided to the UN is accurate and robust.

---

<sup>1</sup> [Equality Act 2006, section 11](#) [accessed 22 November 2024]

<sup>2</sup> [A more equal Wales: Mapping the duties \(2021\)](#) [accessed 22 November 2024]

---

## Our work to promote and protect human rights

The Commission has a statutory duty to promote understanding and protection of human rights and to encourage good practice.<sup>3</sup> We fulfil this duty in a number of ways.

### Human Rights Tracker

Our [Human Rights Tracker](#) is a searchable online tool to track how well the UK is putting its human rights duties into practice. The tracker contains all the most recent recommendations made to the UK by the UN treaty bodies and the Universal Periodic Review (UPR). It allows parliamentarians, civil society and the public to search by [UK](#) and [Wales](#) so you can see which government is responsible for implementing the recommendations and the progress they are making to fulfil their international obligations.

As part of this work, we provide free training sessions to introduce civil society organisations to the UK's international human rights obligations and demonstrate how to use the Human Rights Tracker.

We have trained a number of Welsh Government officials on the Human Rights Tracker.

### Capacity building work

Ensuring a vibrant, strong civil society is recognised in a number of human rights treaties. Through our capacity building work, we help civil society organisations to understand their rights and support them to engage with UN human rights processes as a means of asserting those rights.

Since 2021 we have provided funding for civil society organisations to produce shadow reports to inform UN Committee examinations of the UK and Welsh Governments on a number of treaties including the:

- Convention on the Elimination of all forms of Racial Discrimination (CERD) – Race Equality First
- Convention on the Rights of Disabled People (CRPD) – Disability Wales
- International Covenant on Economic, Social and Cultural Rights (ICESCR) – Just Fair

---

<sup>3</sup> [Equality Act 2006](#), section 9 [accessed 22 November 2024]

---

We have provided funding for organisations to travel to and engage with the UN examinations including:

- Convention on the Rights of the Child (CRC) – Children in Wales
- Convention on the Rights of Disabled People (CRPD) – UK coalition of Disabled People’s Organisations including Disability Wales

## UN treaty monitoring

As the A-status NHRI for England and Wales we have a responsibility to promote the effective implementation of the human rights treaties the UK as the state party has ratified.

Our human rights monitoring work includes providing advice to the UK and Welsh governments and to stakeholders to ensure that human rights breaches are prevented and challenged. We engage with international human rights reviews, including submitting independent reports on implementation of treaty obligations in the UK.

Since 2021, we have submitted reports to the UN on the following international treaties:

- [Convention on the Elimination of all forms of Racial Discrimination \(CERD\)](#)
- [International Covenant of Civil and Political Rights \(ICCPR\)](#)
- [International Covenant of Economic, Social and Cultural Rights \(ICESCR\)](#)
- [Convention on the Rights of the Child \(CRC\)](#)
- [Convention on the Rights of Disabled People \(CRPD\)](#)

## Reporting on progress on equality and human rights

Reporting on progress in protecting equality and human rights is a statutory duty for the Commission.<sup>4</sup> In 2023 we published our [Equality and Human Rights Monitor: Is Wales Fairer report](#).

This report provides an evidence-based overview of progress on equality and human rights in Wales. It is organised by the protected characteristics established in the Equality Act 2010. It also contains a chapter focused on key priority areas including human rights, socio-economic status and the Welsh language.

---

<sup>4</sup> [Equality Act 2006](#), section 12

---

We have engaged extensively with stakeholders across Wales to highlight the key findings and encourage action on the inequalities and human rights issues highlighted by the report.

## **Advising government and the Senedd on human rights**

In fulfilling our statutory duty to provide advice to governments and parliaments we regularly provide expert advice to the Senedd and the Welsh Government on human rights and the international human rights framework, through:

- submissions to Committee inquiries
- responding to Government consultations
- briefings for Senedd Members
- sharing information with Senedd Research Service

Recent examples include giving advice on the human rights framework to the Senedd Children and Young People's Committee inquiry into education access for disabled children. Following our advice the Committee announced that its inquiry would use the UNCRC and UNCRPD as a frame of reference.

In 2023, we submitted evidence to both the Welsh Government and the Senedd Equality and Social Justice Committee on the draft Child Poverty Strategy. We highlighted the need to strengthen the strategy's alignment with the Welsh Government's obligations under the UNCRC, and the recent concluding observations of the UN Committee.

Equality and Human Rights Commission,

15 October 2024

Dear Ruth Coombs,

**Strengthening and Advancing Equality and Human Rights in Wales**

In May 2022, the Welsh Government set out five action areas that addressed all the accepted recommendations of the [SAEHR report](#). One of these recommendations emphasised the need to strengthen relationships and collaboration between government, the Equality and Human Rights Commission, Future Generations Commissioner and Law Society in promoting the human rights agenda.

In light of the above we would welcome an update from you on the recommendations relating to collaboration between the Welsh Government and the Equality and Human Rights Commission, including any specific details of any action taken.

We have also enclosed a copy of the latest correspondence to the Welsh Government which provides more context to our work in this area.

We look forward to hearing from you.

Yours sincerely,



**Jenny Rathbone MS**  
Chair, Equality and Social Justice Committee

# Agenda Item 4.7

## Introduction

FRESH (Foundation data for Robust Energy Strategies for Housing) is a powerful data mapping system managed by Warm Wales CIC with sponsorship from Wales and West Utilities. The system is based on an innovative carbon cluster mapping system developed at Cardiff University by the Low Carbon Research Institute and Welsh School of Architecture, funded under the EU Solcer project.

The main use of FRESH is to identify areas in most need of action within Local Authority neighbourhoods. The mapped data analysis will inform the deployment of resources and will act as an enabling tool to co-ordinate existing agencies, moving from a reactive referral system to proactive targeting of locally defined areas of highest need.

The FRESH Energy Performance Certificate (EPC) Data Report presents an overview and a geographical breakdown of cross-tenure housing stock within the Local Authority boundary, typically pinpointing areas of high energy consumption and fuel costs. This data is combined with overlays of vulnerability, enabling local councils to engage proactively in discussions with Local Communities and ECO Energy Providers and helping formulate bids for internal resources and external sources of funding.

Presented maps are based on the Office for National Statistics' (ONS) Super Output Area (SOA) geography. The geographical system is designed to report statistics for small areas of similar population size, number of households and social homogeneity (ref). Most of the maps will be presented at the lowest geographical level - Output Area (OA), each containing approximately 120 dwellings. Data not available at this level will be mapped at Lower Super Output Area (LSOA) level which contain between 400 and 1,200 dwellings with a population of between 1,000 and 3,000.

Maps presented in this report are based on a process of ranking OAs from worst performing to best performing. OAs are then divided into 5 quantiles, each with an equal number of OAs. OAs in the first quantile are the worst performing 20% and OAs in the 5<sup>th</sup> quantile the best performing. Maps that consider more than 2 variables are created by combining ranked data with equal weighting to form a new ranking and quantile groupings for OAs.

## Modelling approach

The modelling approach used allows the housing stock's characteristics to be considered at a lower geographical level than the freely available Local Authority statistics. A database of all available EPCs is used alongside Census data to approximate the condition of all dwellings, taking into account the location of properties and typological differences. Consequently, the model formed provides information on the condition of all properties within the Local Authority broken down to smaller geographical areas. The grouping described in table 2 is used on OA level for the FRESH process, creating 360 possible property groups.

Table 5 displays the grouping of all available EPCs whilst table 6 shows the modelled grouping of all properties within the Local Authority based on the OA level model.

Table 1: Property Grouping Description - OA level

<b>Typology (4)</b>	<b>Size (2)</b>	<b>Rating (3)</b>	<b>Fuel (5)</b>	<b>Age (3)</b>
D (Detached)	L (Large)	ABC	B (Biomass)	1 (pre 1919)
F (Flat)	S (Small)	DE	E (Electricity)	2 (1919-1983)
SD (Semi)		FG	G (Gas)	3 (post 1983)
T (Terrace)			O (Oil)	
			S (Solid)	

Table 2: Property Grouping of EPCs in Cardiff – LSOA Model (need to change to OA)

ALL EPCs IN CARDIFF (74081)			Gas (63375)			Oil (81)			Solid (50)			Electricity (10575)			Y		
			ABC (21980)	DE (39861)	FG (1534)	ABC (12)	DE (54)	FG (15)	ABC (1)	DE (13)	FG (36)	ABC (5950)	DE (3526)	FG (1099)			
 Detached (5906)	Pre 1919 (250)	Large (147)	8	77	41				8	6							
		Small (103)	8	64	21				2	1							
	1919-1982 (3792)	Large (1939)	253	1532	117	1	15	1	1	1		5	9	4			
		Small (1853)	227	1408	53		1	1			2	94	62	5			
	Post 1982 (1864)	Large (971)	663	288			3			1		8	6	2			
Small (893)		531	338	1							7	14	2				
 Semi (15016)	Pre 1919 (773)	Large (573)	25	441	88				2	2			1	12			
		Small (200)	15	148	18				2				3	14			
	1919-1982 (13016)	Large (8485)	1521	6643	192		1	1		2	6	12	46	61			
		Small (4531)	987	579	65		1			2	4	18	43	32			
	Post 1982 (1227)	Large (714)	637	64								9	4				
Small (513)		412	92								5	4					
 Terraced (25611)	Pre 1919 (11756)	Large (8523)	427	7504	482				2			4	4	89			
		Small (3233)	345	2670	123		1			1	5	5	26	57			
	1919-1982 (11536)	Large (6199)	1902	4193	81					3	1	26	47	36			
		Small (5337)	135	871	26					1	1	113	152	38			
	Post 1982 (2319)	Large (1336)	1221	82								23	10				
Small (983)		865	75								24	19					
 Bungalow (2351)	Pre 1919 (28)	Large (15)		11								1	2				
		Small (13)		8	3								1	1			
	1919-1982 (2187)	Large (1059)	136	853	50		5						5	10			
		Small (1128)	315	783	13		2	1				1	6	7			
	Post 1982 (136)	Large (77)	61	12			2					1	1				
Small (59)		43	6		1							8	1				
 Flat (25197)	Pre 1919 (6495)	Large (2960)	616	1875	75		2				2	96	142	152			
		Small (3535)	953	1481	48		3	1				174	556	319			
	1919-1982 (16721)	Large (8520)	259	1860	28	2	1			1	1	2484	1065	119			
		Small (8201)	389	1180	9	8	1					272	921	121			
	Post 1982 (1981)	Large (1039)	550	10								286	189	4			
Small (942)		476	3								283	180					

Table 3: Modelled Property Grouping of All Properties in Cardiff – LSOA Model (need to change to OA)

ALL DWELLINGS IN CARDIFF (146763)			Gas (130201)			Oil (169)			Solid (122)			Electricity (16271)			Y		
			ABC (48287)	DE (78608)	FG (3306)	ABC (14)	DE (117)	FG (38)	ABC (3)	DE (35)	FG (84)	ABC (8724)	DE (5779)	FG (1768)			
 Detached (14979)	Pre 1919 (480)	Large (385)	12	231	80				25	21					8		
		Small (95)	4	63	20				6	2							
	1919-1982 (6249)	Large (3906)	504	3034	312	3	34	1	3	3		3	2	7			
		Small (2343)	330	1869	122		2	2			6		5	7			
	Post 1982 (8250)	Large (4452)	2790	1564			13			7		56	12	10			
Small (3798)		2195	1583	9							5	6					
 Semi (33845)	Pre 1919 (2094)	Large (1690)	53	1364	216				4	9			13				
		Small (404)	13	310	60								6	15			
	1919-1982 (26777)	Large (18787)	2881	15196	478		2	2		4	9	5	71	139			
		Small (7990)	1477	8229	148		3			6	7	6	55	59			
	Post 1982 (4974)	Large (2755)	2391	340								6	18				
Small (2219)		1575	539								37	68					
 Terraced (52084)	Pre 1919 (24001)	Large (17412)	808	15382	1010				5			24	2	5	176		
		Small (6589)	648	477	277		4			2	12	5	44	120			
	1919-1982 (18861)	Large (11266)	3475	750	135					6	2	13	39	56			
		Small (7595)	2780	4531	49					2	1	39	141	52			
	Post 1982 (9222)	Large (3853)	3536	222								62	33				
Small (5369)		3559	557								101	152					
 Bungalow (4465)	Pre 1919 (10)	Large (10)										10					
		Small (10)															
	1919-1982 (3765)	Large (2350)	245	1944	115		10						7	29			
		Small (1415)	319	1041	27		2						12	14			
	Post 1982 (690)	Large (90)	61	29													
Small (600)		560	40														
 Flat (41390)	Pre 1919 (10803)	Large (4897)	1052	3182	123		1				4	81	202	252			
		Small (5906)	1595	2536	82		4	1				262	903	523			
	1919-1982 (12371)	Large (6188)	2714	2293	34	1	1			1	2	492	519	131			
		Small (6183)	3432	1334	9	10	1					678	604	115			
	Post 1982 (18216)	Large (10069)	779	150								3340	1782	18			
Small (8147)		3499	28								3536	1084					

## Households vulnerable to living in cold homes

A review of recent literature presented in (CSE report ref) identifies associations between certain characteristics of individuals or households and having an above average likelihood of living in a cold home and/or being likely to be particularly vulnerable to the harmful effects of living in a cold home.

The vulnerability characteristics identified are:

- Older people (over 65 / or more likely to be vulnerable if over 75)
- Dependent children (under 18 / or more likely to be vulnerable if under 5)
- Health problem
  - Disability or long term health condition
  - Respiratory or circulatory disease
  - Mental health condition

Based upon the findings of this report, the target group to receive assistance through a future energy efficiency scheme should be any household which meeting all four of the following characteristics:

- In a home that is owner occupied or privately rented
- In a home that is energy inefficient
- On a relatively low income
- With an additional vulnerability

### Energy Inefficiency

According to DECC's 2016 statistics on the number of Energy Performance Certificates lodged by Local Authority and Energy Efficiency Rating (ref), Cardiff's distribution of properties within rating bands is slightly better than that of the whole of Wales (figure 8). Cardiff has a lower percentage of F and G rated properties (4% compared to 10% in Wales) and higher proportion of C rated properties (30% compared to 24% in Wales).

The CSE report (ref) recommends that homes with SAP ratings of E, F or G are defined as being energy inefficient and be targeted in future schemes which account for 21% of Cardiff's stock (figure 8). However, this criterion could be widened to include cost effective work to properties rated D, a further 41% in Cardiff, totalling 62% of the housing stock (figure 8).

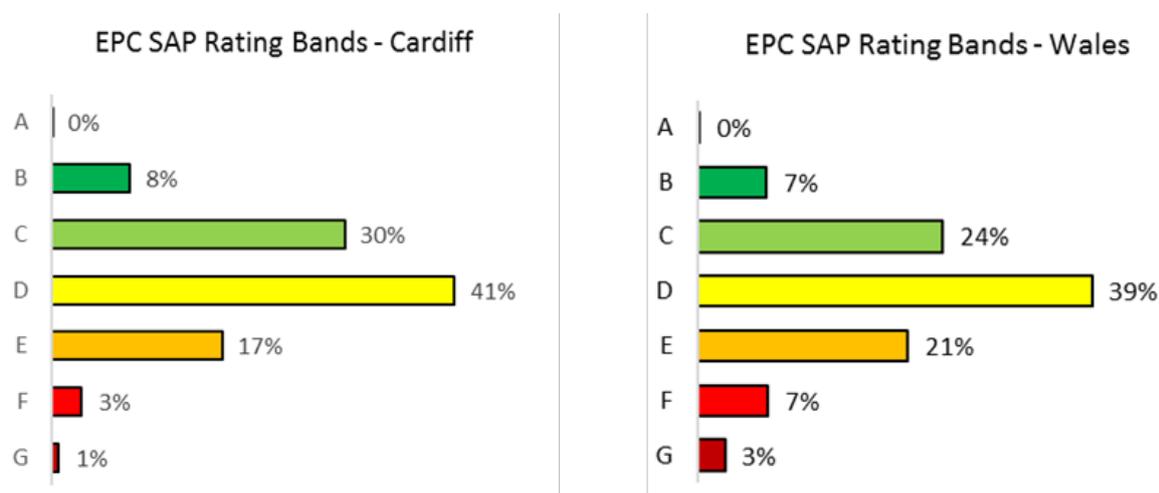


Figure 1: Energy Performance Certificates by SAP Rating Bands - Cardiff and Wales

## Property Types

A high proportion of Cardiff's dwellings are terraced properties and flats (figure 2). Properties built before 1919 usually have solid walls and are categorised as hard to treat. Compared to other Welsh Local Authorities, Cardiff has the 8<sup>th</sup> lowest proportion (25.5%) of housing built before 1919 (figure 3 and 4), with the majority of this age group belonging to the predominant house type within the Welsh stock – the pre 1919 terraced house (16.4% of Cardiff's stock).

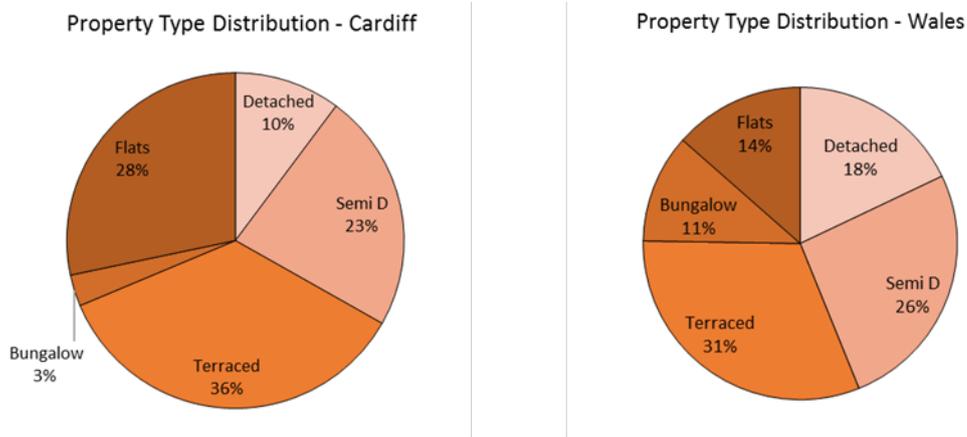


Figure 2: Property Type Distribution - Cardiff and Wales

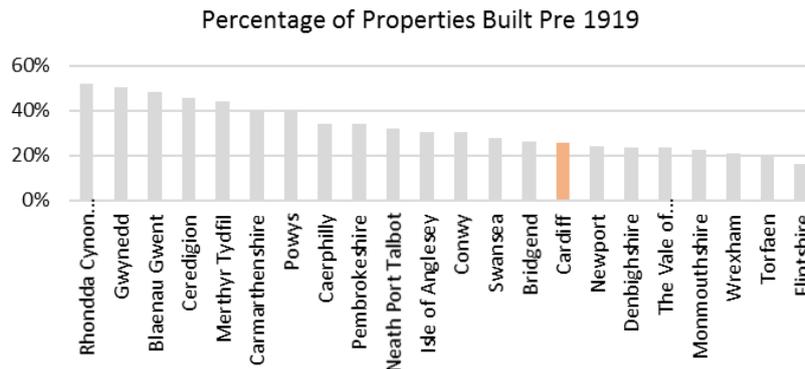


Figure 3: Percentage of Properties Built Pre 1919 per Local Authority

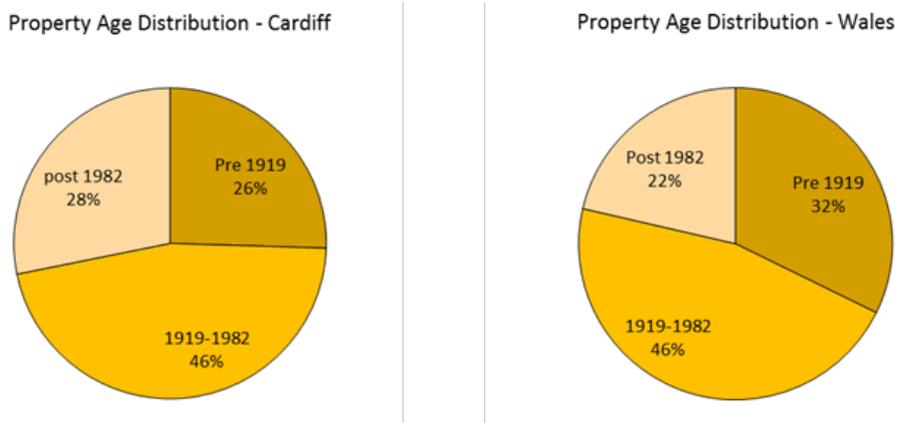


Figure 4: Property Age Distribution - Cardiff and Wales

## Gas Network Connectivity

According to DECC's 2014 estimates of homes not connected to the gas network (ref), 6% of Cardiff's dwellings were not connected to the network (figure 5). Modelling results based on all available EPCs in 2016 approximate that 11.3% of Cardiff's properties use fuels other than mains gas or LPG as their main fuel (figure 6). Compared to other Welsh Local Authorities, Cardiff ranks as the 10th best Local Authority in terms of gas network connectivity and has a lower proportion of off gas than the Welsh average of 15% (figure 5).

DECC's 2013 gas network connectivity data (ref) estimates the distances of properties to their nearest gas connection and has been aggregated to LSOA level. According to this data source, there is a higher proportion of dwellings (26%) not connected to the gas network (figure 7). DECC approximates that around 10% of the non-gas properties' addresses counted within this dataset have not been identified and consequently not matched to their gas meters. Therefore, the true value is likely to be reduced by approximately 10%.

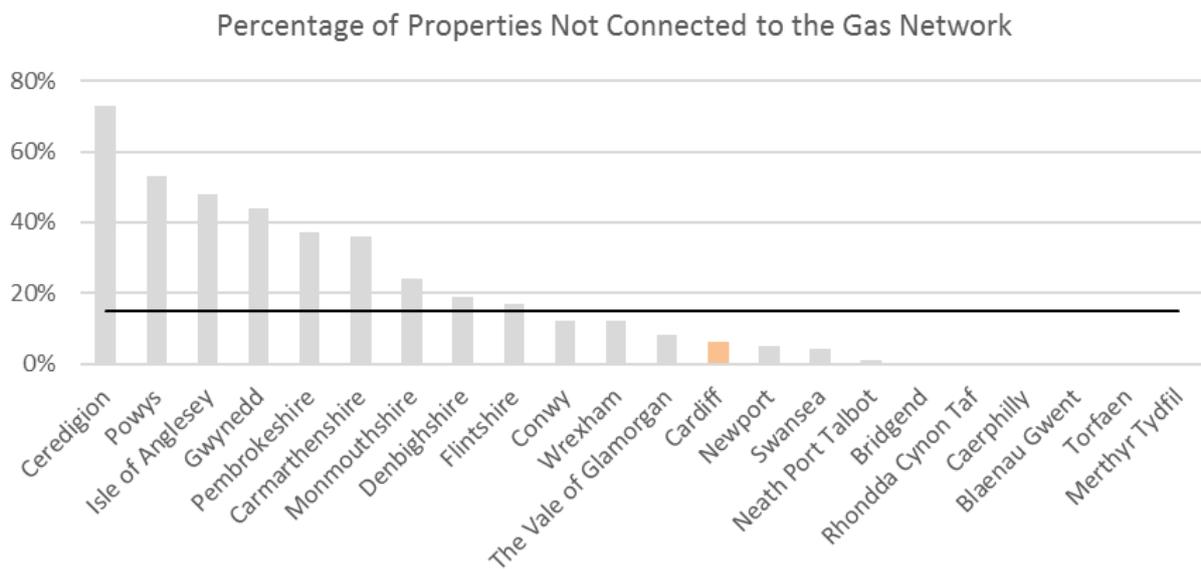


Figure 5: Percentage of Properties Not Connected to the Gas Network - DECC 2014

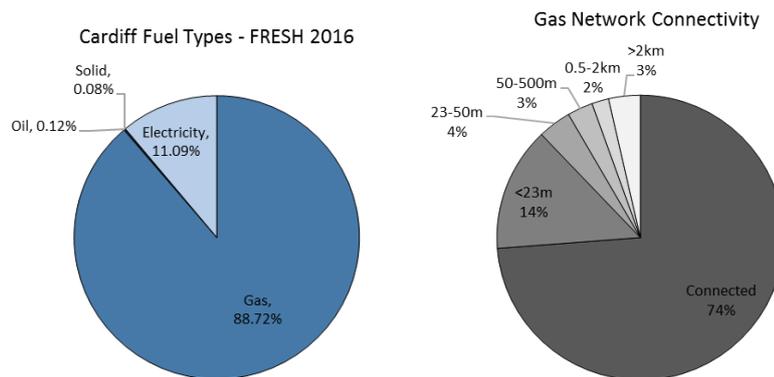


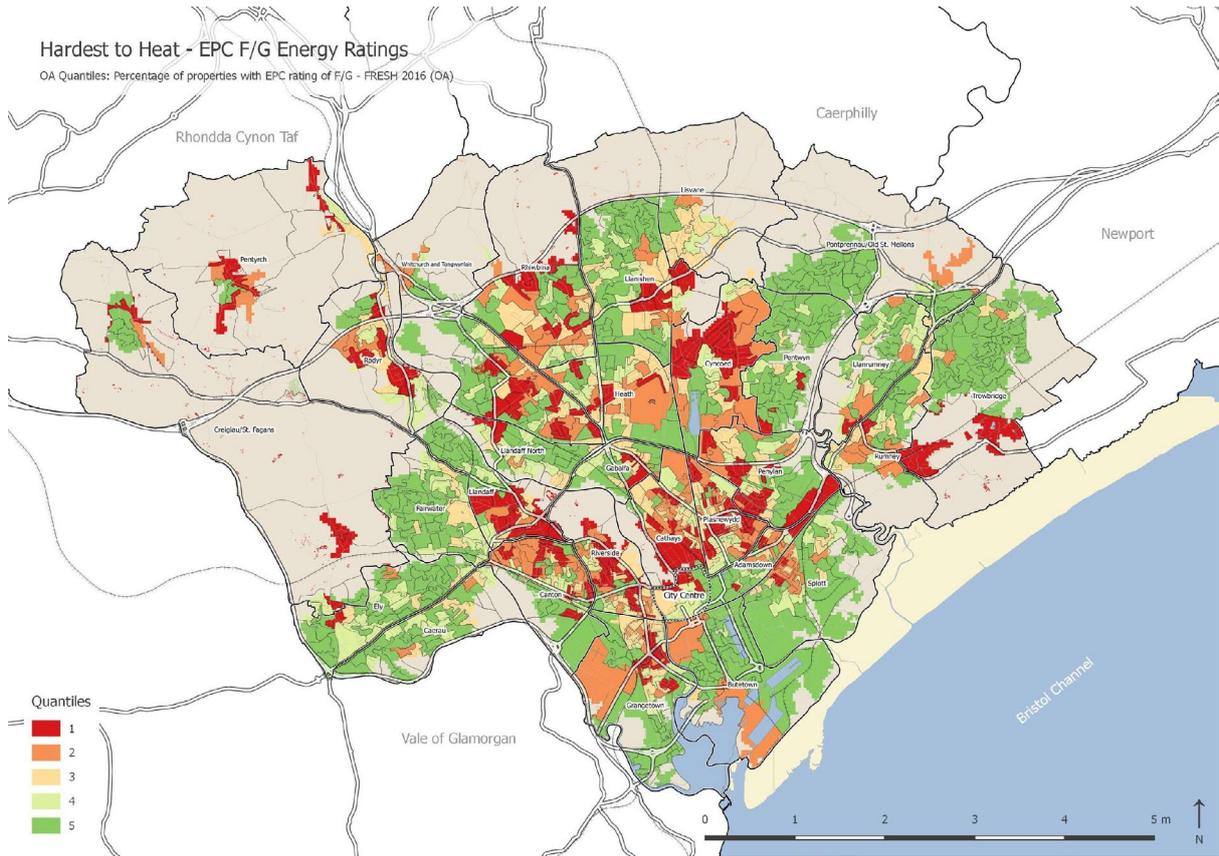
Figure 6: Modelled Fuel Type Distribution in Cardiff's Households - FRESH 2016

Figure 7: Gas Network Connectivity and Distance to Network - DECC 2013



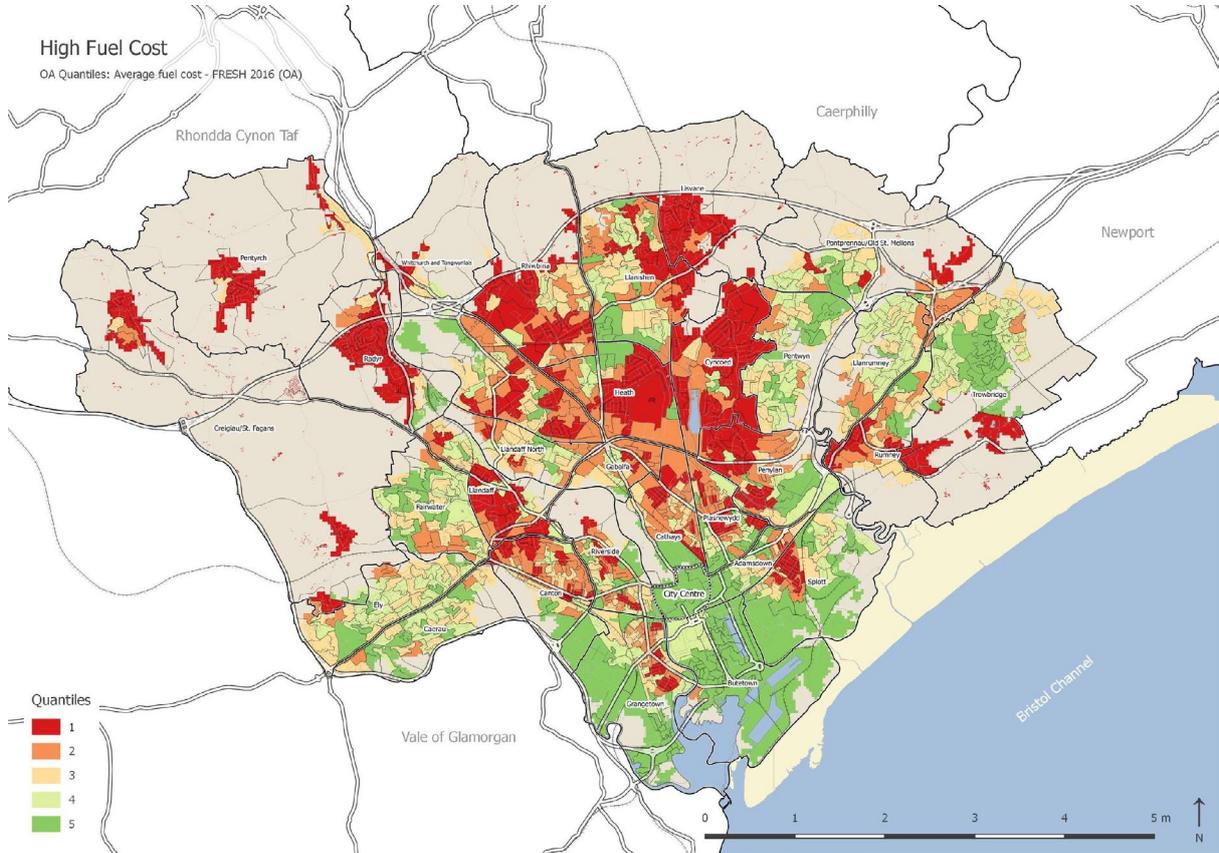
### Hardest to Heat - EPC F/G Energy Ratings

OA Quantiles: Percentage of properties with EPC rating of F/G - FRESH 2016 (OA)



### High Fuel Cost

OA Quantiles: Average fuel cost - FRESH 2016 (OA)



## Low Income

Low income households are a key target group as they have limited financial means to be able to heat their homes to adequate levels of warmth in cold winters (Centre for Sustainable Energy, 2010). Low income households may come up against a “heat or eat” dilemma whereby they have to make a decision between heating their home and buying food (Marmot Review Team, 2011). The limited financial means of low income households also reduces their ability to pay for energy efficiency improvements to their homes, in order to make them easier to heat and cheaper to run.

Commonly in the UK, the standard definition of low income specifies that households on an income below 60% of the national median are on low incomes (or in relative poverty). In this definition, incomes are equivalised for different household types and can be expressed either ‘before housing costs’ (e.g. rental or mortgage payments) or ‘after housing costs’. (CSE report) also states that the main way that households will be able to demonstrate eligibility due to low income is through proof of benefit correspondence from HMRC/DWP, with the following list of benefits considered the most appropriate set of existing means tested benefits:

- **Pension Credit** (Guarantee Credit Element), which covers low income older people
- **Child Tax Credit** and with income below a certain threshold, which captures low income households with dependent children
- Income related **Jobseekers Allowance and Child Benefit**, which includes other low income households with dependent children
- Income related **Employment Support Allowance (ESA)**, identifying low income households with additional vulnerabilities
- Benefits that were replaced by ESA (**Incapacity Benefit, Income Support** paid because of illness or disability, **Severe Disablement Allowance (SDA)**), which covers some low income disabled people
- **Income support**, for which low income and pregnant mothers, carers, lone parents with a child under 5, or long sick or disabled are all eligible.
- **Universal Credit** (combines six existing benefits into one: Income Support; income related Job Seekers Allowance; income related Employment Support Allowance; Child Tax Credits; Working Tax Credits; and Housing Benefit)

The 2014 Welsh Index of Multiple Deprivation defines income deprivation as the percentage of the population in receipt of income related benefits (income support claimants, jobseekers allowance claimants, pension credit claimants and income based employment and support allowance claimants), in receipt of Tax Credits (children or adults with families that are in receipt of working tax credits and child tax credits with an income less than 60% of the median income for Wales before housing costs); or a supported asylum seeker.

- 18% of Cardiff’s population is in income deprivation compared to 17% in Wales
- 43% of Cardiff’s LSOAs (91 out of 214) have a greater percentage of their population in income deprivation than the Welsh average of 17% (see figure ...)

Figure 1 shows the percentage of the population in income deprivation in Cardiff’s LSOAs compared to the Welsh average.

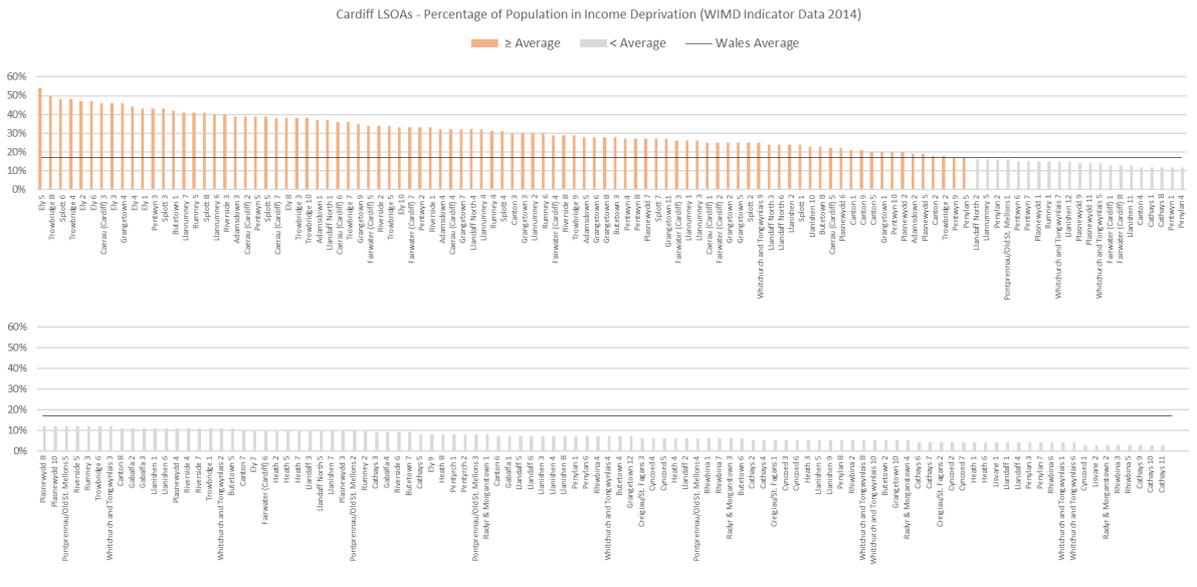
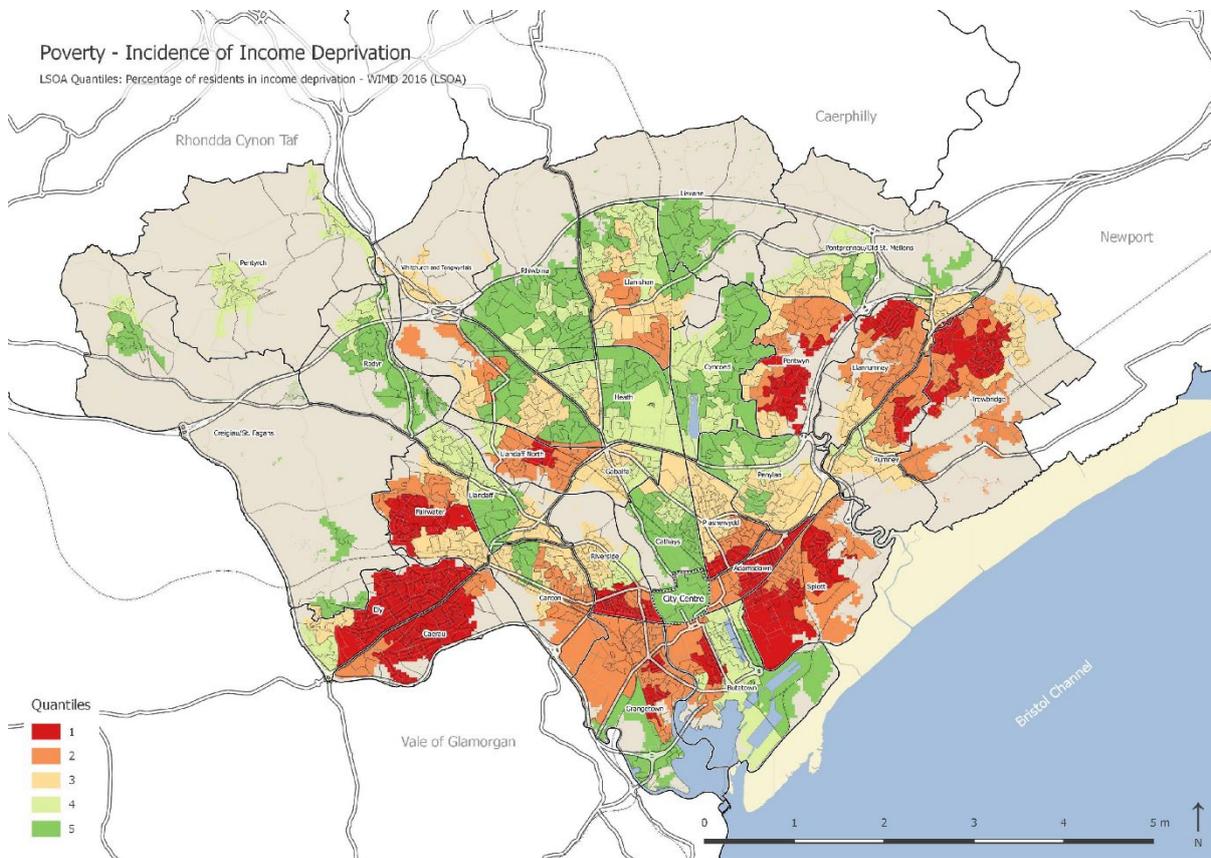


Figure ... categorises LSOAs into 5 quantiles based on the percentage of population in income deprivation (where 1 - red represents the worst 20%).

Figure ... indicates the likelihood of areas having high average fuel costs and a high proportion of the population in income deprivation using a 5x5 grid of quantiles. The red (1x1) areas are the most likely to have high average fuel costs as well as to contain a high percentage in income deprivation whilst the darker green areas are likely to have low fuel costs and low percentage of the population in income deprivation.

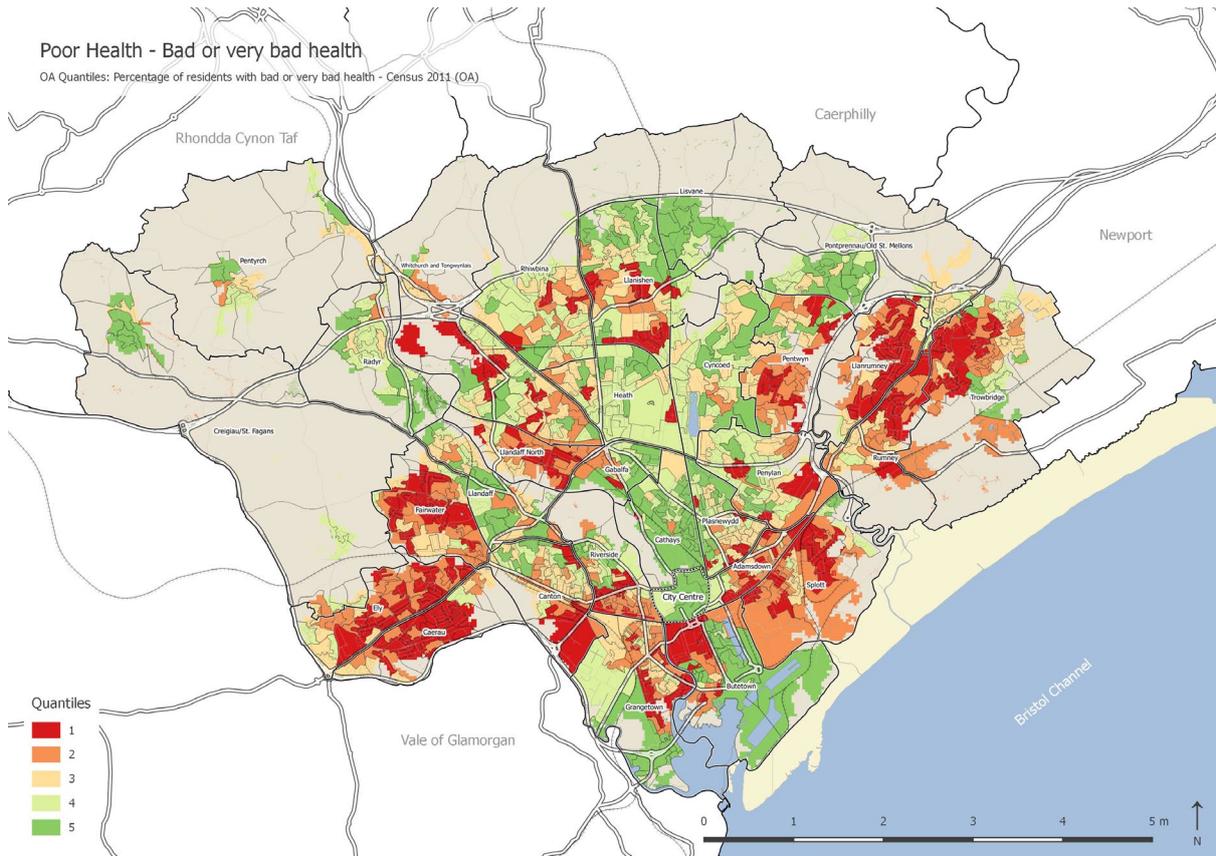




## Poor Health

People with disability often struggle to pay their bills and keep their homes warm enough (Gore and Parckar, 2009). Below-average employment rates amongst disabled people and associated below-average incomes mean that disabled people have a greater than average risk of living in a cold home (Disability Action, 2011). Furthermore, high rates of unemployment amongst disabled people increase the likelihood of spending more time at home, and potentially in a cold home (CSE).

Figure ... categorises LSOAs into 5 quantiles based on the percentage of population with bad or very bad health based on census 2011 data (where 1 - red represents the worst 20%).

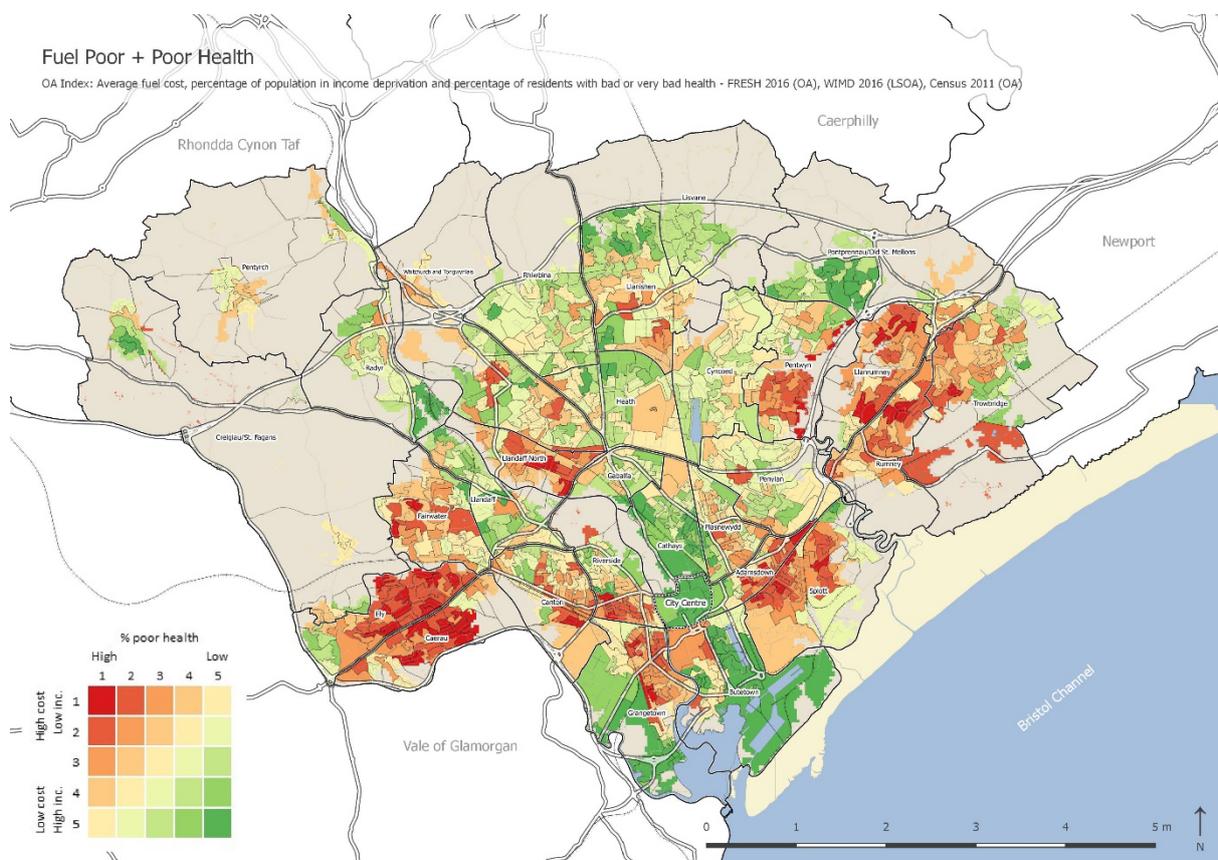


## Areas most likely to contain households vulnerable to living in cold homes

### Areas with high fuel costs, income deprivation and high levels of poor health

Based on the Living in Wales (LiW) Survey 2008, (CSE report) states that nationally, 47% of all low income households contain people who are disabled or with a long term health problem (fig ..).

Figure ... indicates the likelihood of areas having high average fuel costs, a high proportion of the population in income deprivation and high levels of poor health. The red (1x1) areas are the most likely to have high average fuel costs and high percentage in income deprivation as well as high levels of poor health.

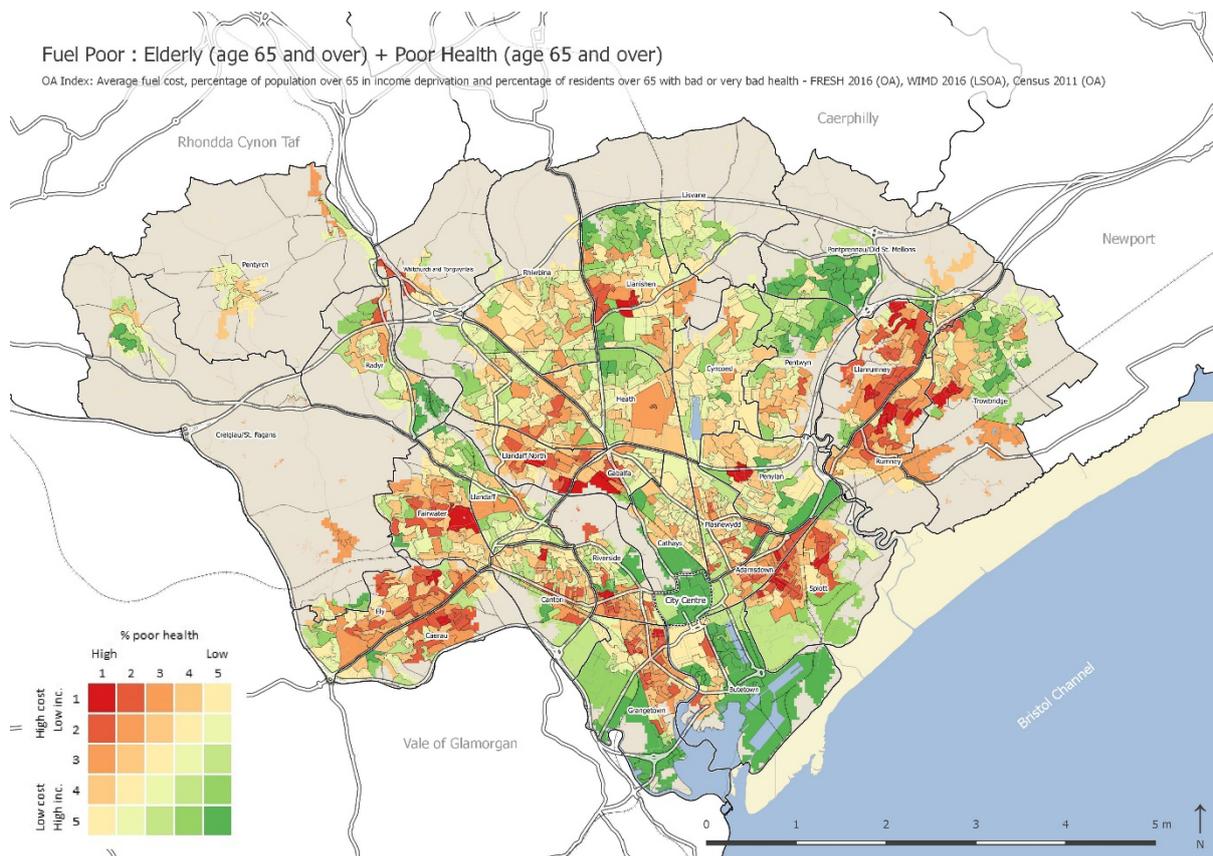


### Areas with high fuel costs, older people in income deprivation and high levels of older people with poor health

Physiological factors contribute to older people's greater susceptibility to the harmful effects of cold homes. According to the (CSE report), there is greater likelihood with increasing age that pre-existing health conditions can be exacerbated by cold temperatures. Older people are also more likely to live in single occupancy, or under-occupied households, with many older people, including older people who live alone, living in large homes that are costly to heat (Centre for Ageing Research and Development in Ireland, 2014). Residents over the age of 75 are likely to be even more vulnerable to the risks of living in cold homes (CSE report).

Based on the Living in Wales (LiW) Survey 2008, (CSE report) states that nationally, 30% of low income households are older adult households with 69% of those households containing people who are disabled or with a long term illness (see fig ...).

Figure ... indicates the likelihood of areas having high average fuel costs, a high proportion of older people in income deprivation and high levels of poor health amongst the elderly. The red (1x1) areas are the most likely to have high average fuel costs and high percentage in income deprivation as well as high levels of poor health.



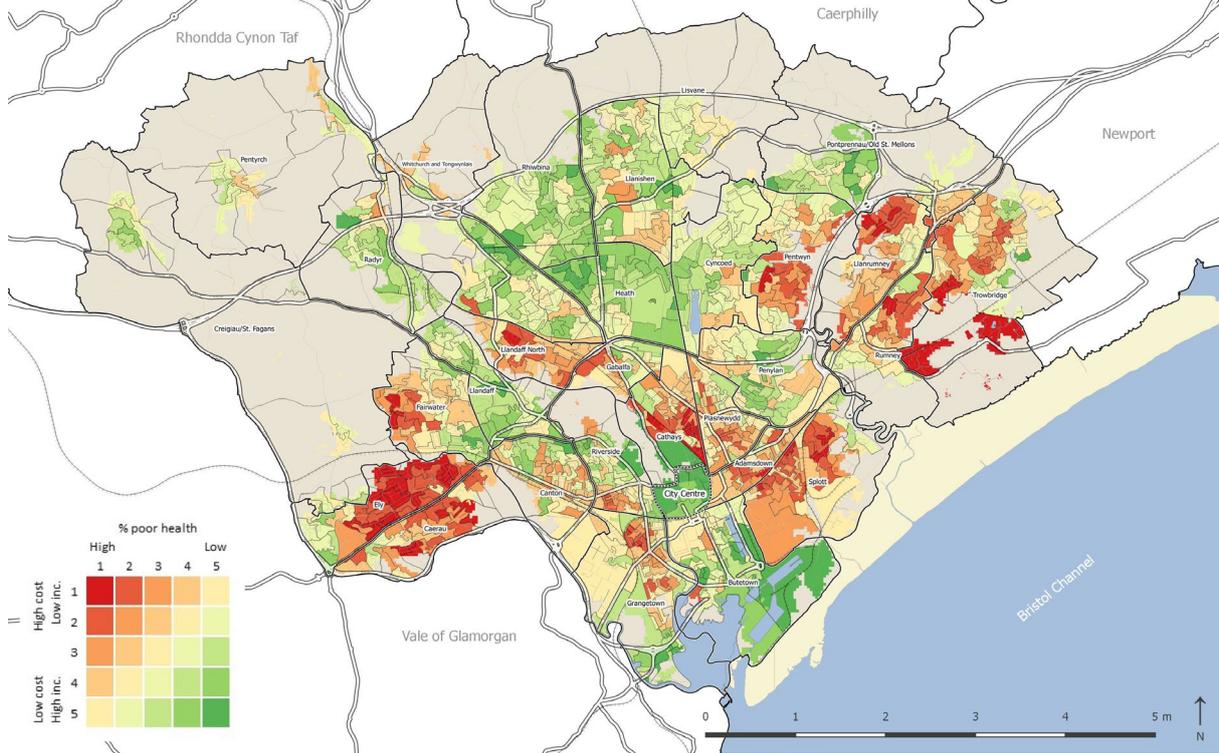
Areas with high fuel costs, children in income deprivation and high levels of poor health in households with children

According to (CSE report), members of households with children, particularly children under five, spend an above-average amount of time at home, increasing their exposure to the harmful health effects of living in cold homes. Based on the Living in Wales (LiW) Survey 2008, (CSE report) states that 14% of low income households are households with dependent children (see fig ...). Based on the Living in Wales (LiW) Survey 2008, (CSE report) states that nationally, 4% of all low income households contain dependent children and people who are disabled or with a long term illness. It is also indicated that 30% of all dependent children living in low income households live in households with people who are disabled or have a long term illness (see fig ...).

Figures ... and ... indicate the likelihood of areas having high average fuel costs, a high proportion of children (under 5 and under 18 respectively) in income deprivation and high levels of children living in households where 1 or more occupants have poor health. The red (1x1) areas are the most likely to have high average fuel costs.

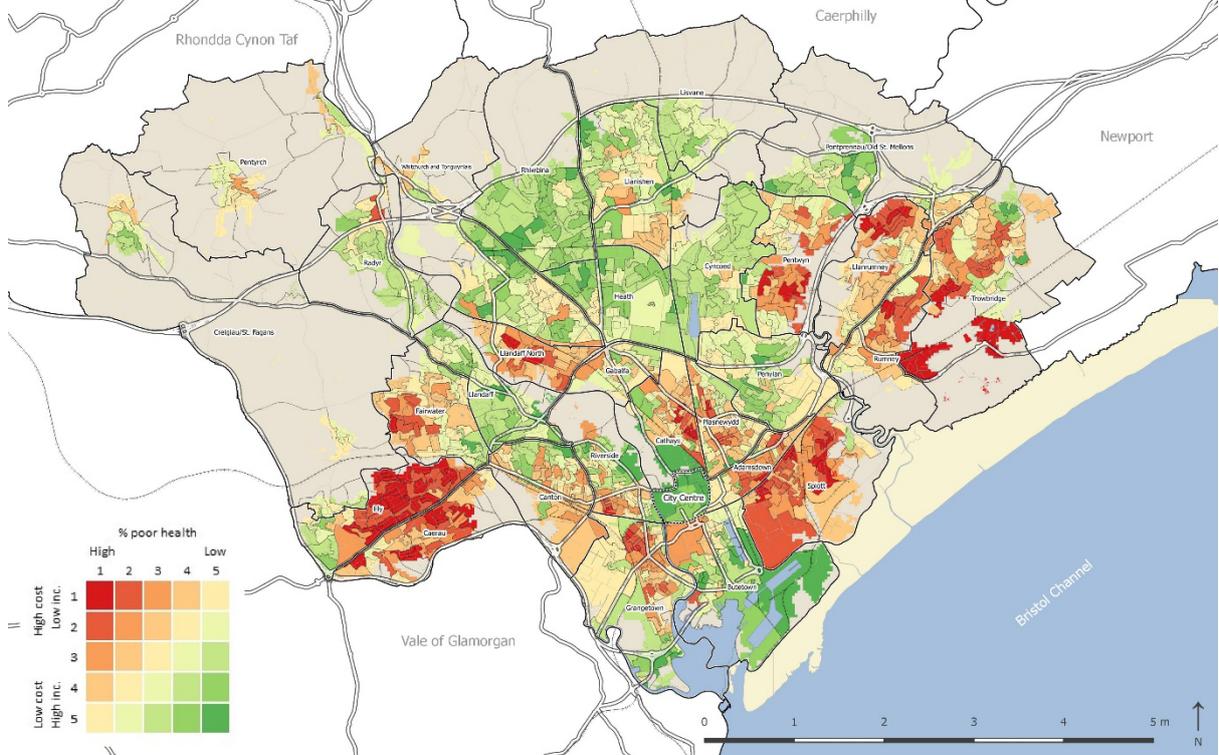
### Fuel Poor : Pre School Children (age 0-4) + Poor Health (households with children)

OA Index: Average fuel cost, percentage aged 0-4 in income deprivation and percentage of households with dependent children and 1+ with a health problem - FRESH 2016 (OA), WIMD 2016 (LSOA), Census 2011 (OA)



### Fuel Poor : Children (age 0-18) + Poor Health (households with children)

OA Index: Average fuel cost, percentage aged 0-18 in income deprivation and percentage of households with dependent children and 1+ with a health problem - FRESH 2016 (OA), WIMD 2016 (LSOA), Census 2011 (OA)



# Poor Housing - EPC E/F/G Energy Ratings

OA Quantiles: Percentage of properties with EPC rating of E/F/G - FRESH 2016 (OA)

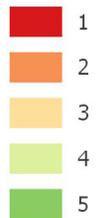
Rhondda Cynon Taf

Caerphilly

Newport

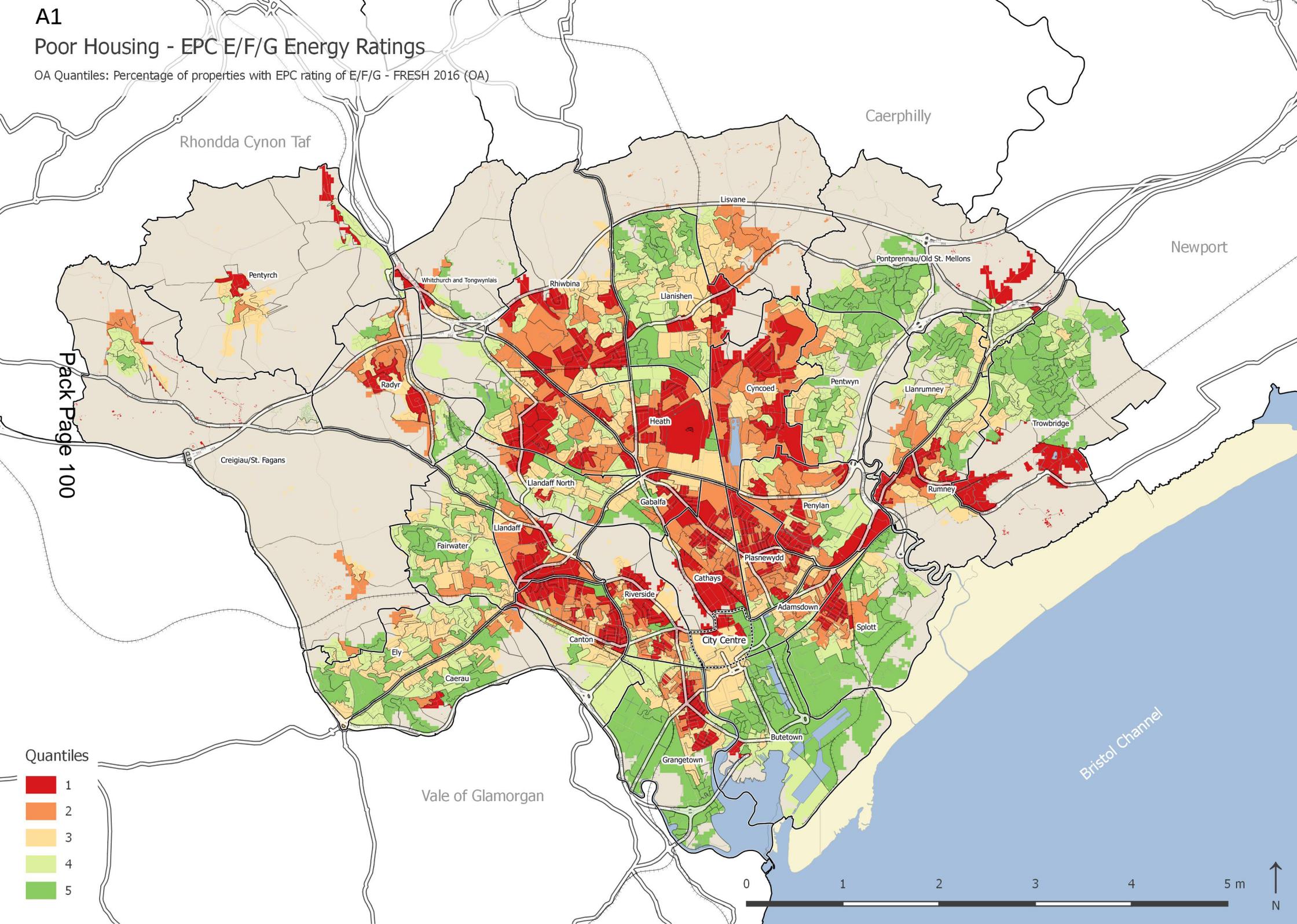
Pack Page 100

Quantiles



Vale of Glamorgan

Bristol Channel



# Hardest to Heat - EPC F/G Energy Ratings

OA Quantiles: Percentage of properties with EPC rating of F/G - FRESH 2016 (OA)

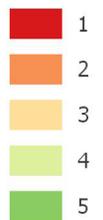
Rhondda Cynon Taf

Caerphilly

Newport

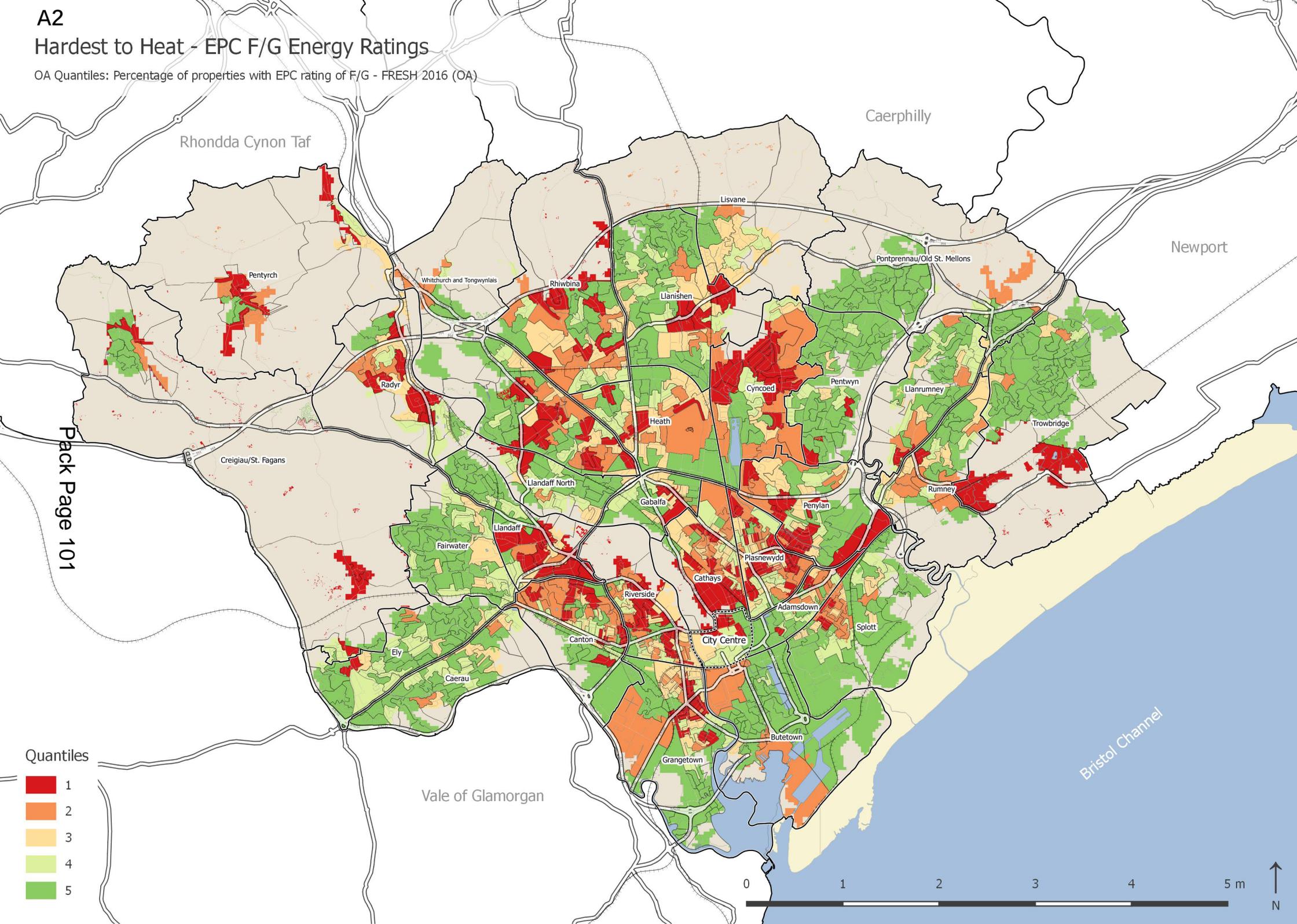
Pack Page 101

Quantiles



Vale of Glamorgan

Bristol Channel



# B1 Poverty - Incidence of Income Deprivation

LSOA Quantiles: Percentage of residents in income deprivation - WIMD 2016 (LSOA)

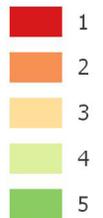
Rhondda Cynon Taf

Caerphilly

Newport

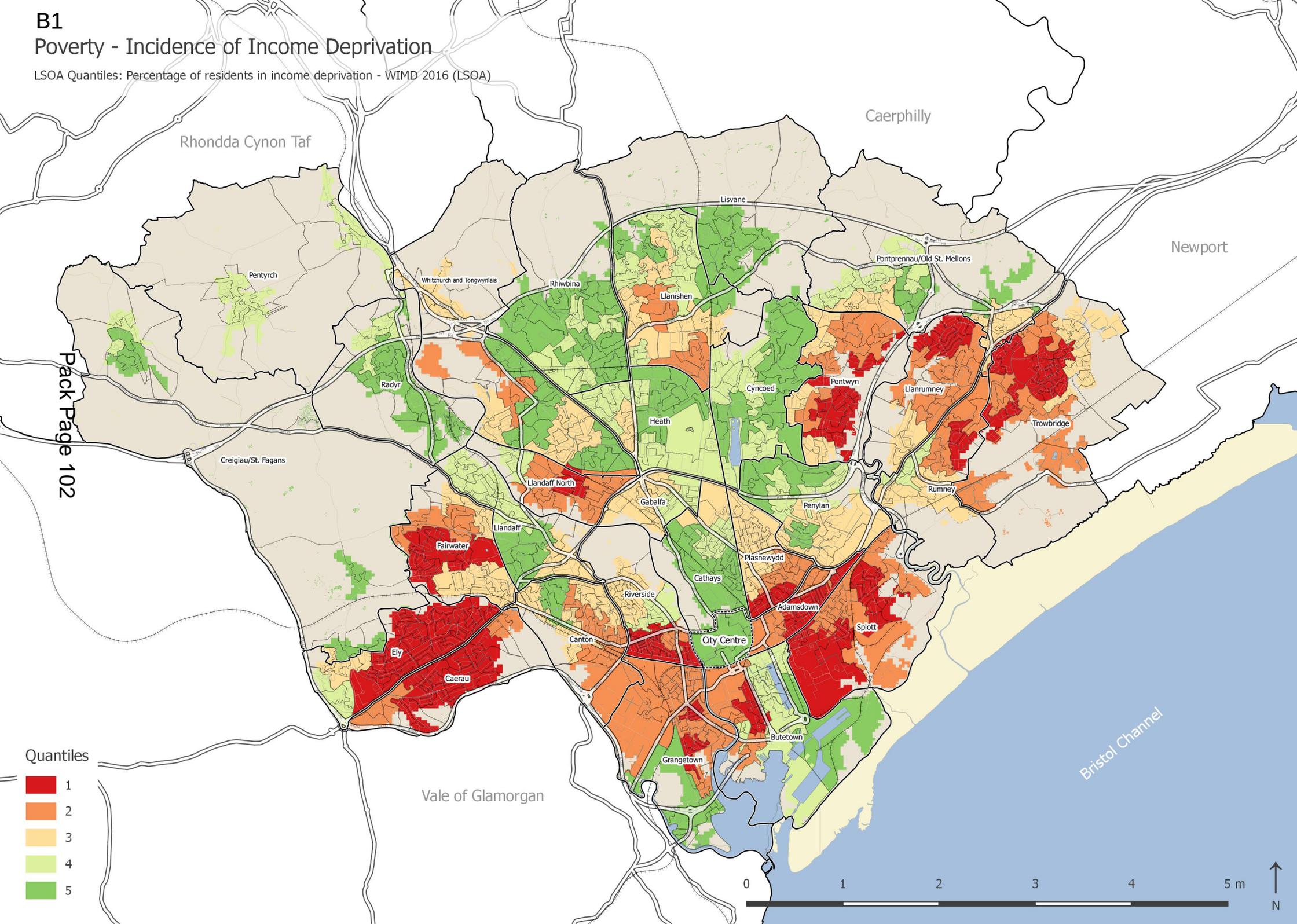
Pack Page 102

Quantiles



Vale of Glamorgan

Bristol Channel



# B2 High Fuel Cost

OA Quantiles: Average fuel cost - FRESH 2016 (OA)

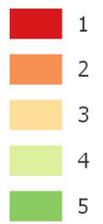
Rhondda Cynon Taf

Caerphilly

Newport

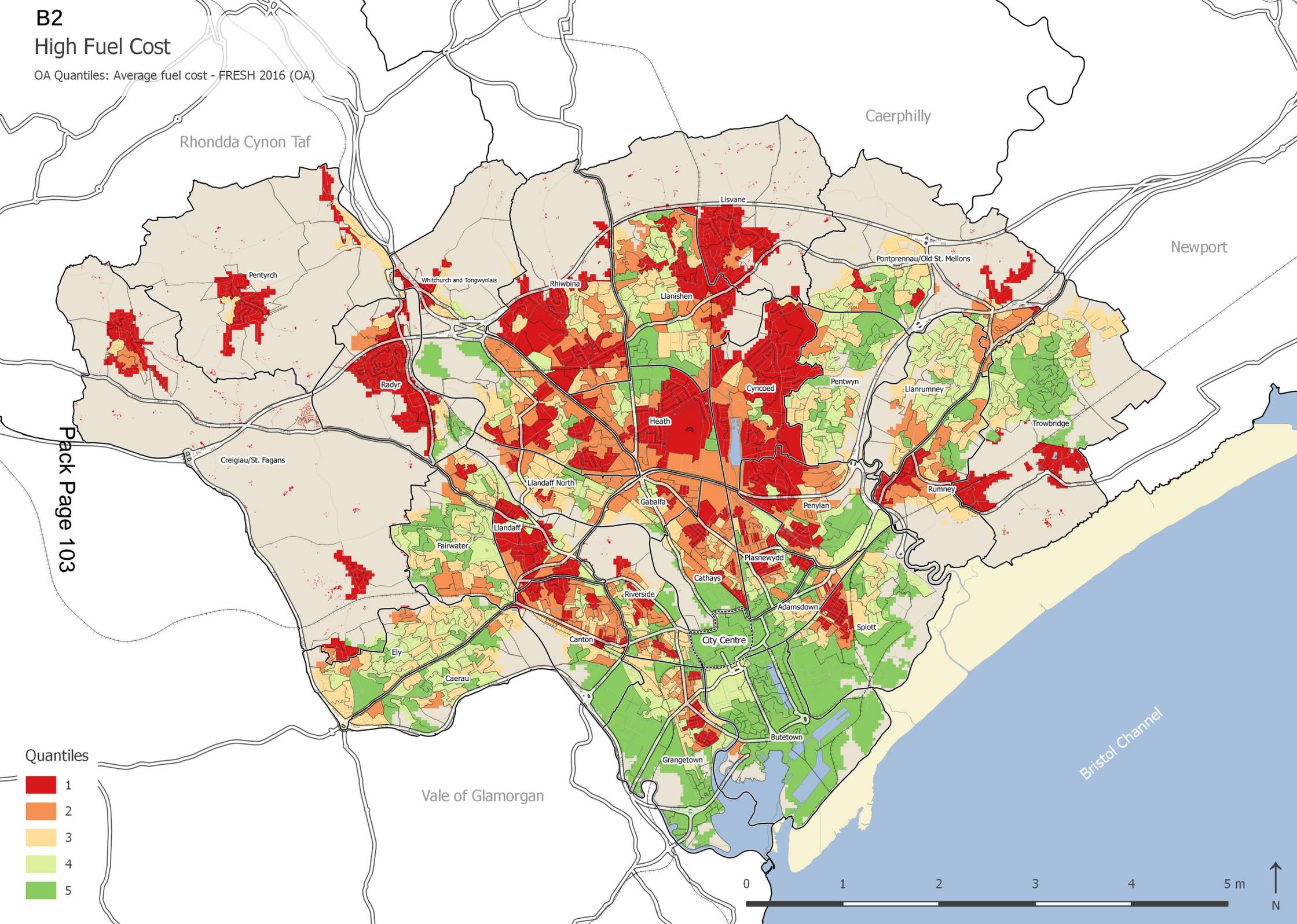
Pack Page 103

Quantiles



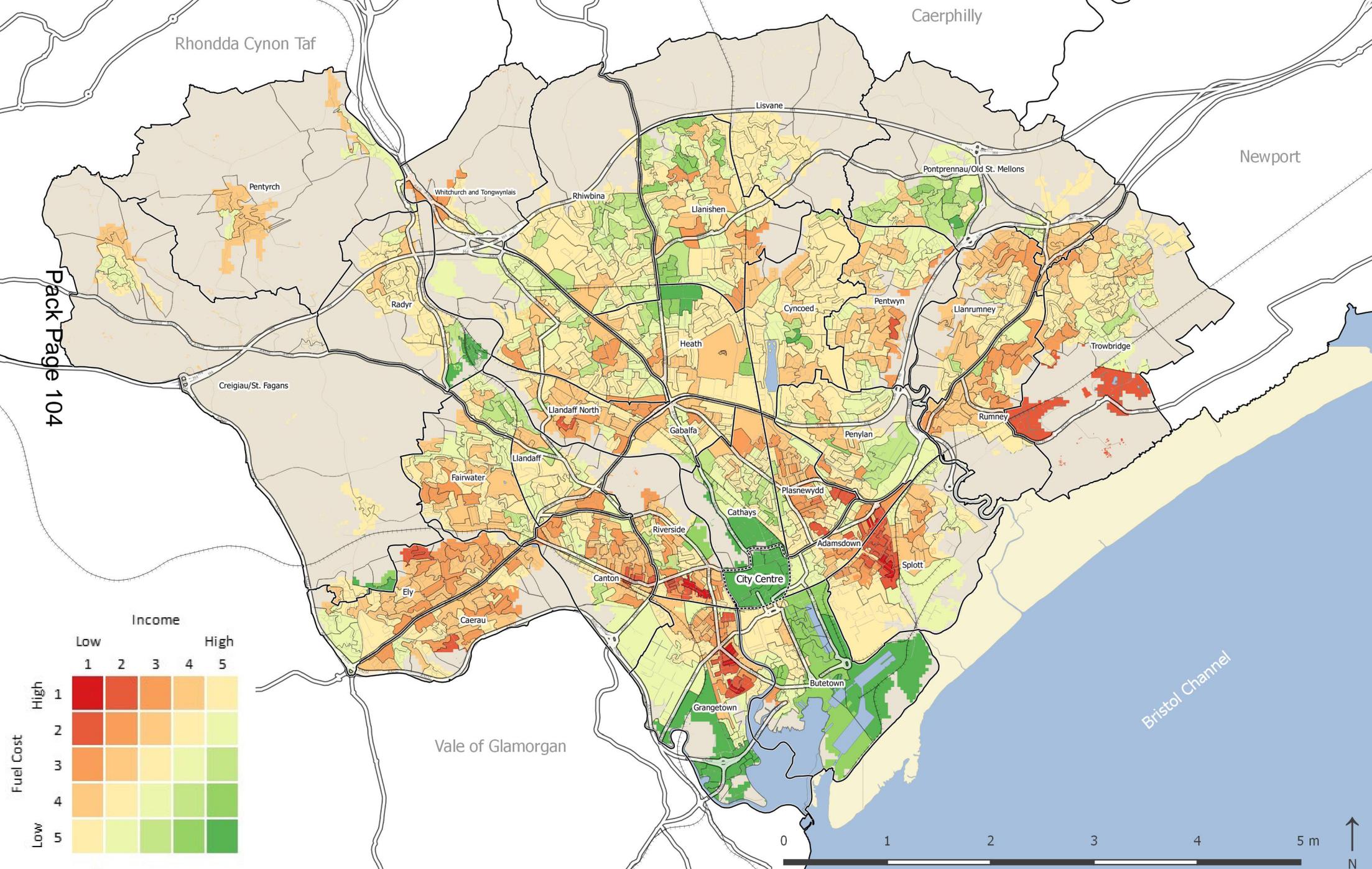
Vale of Glamorgan

Bristol Channel



# Fuel Poor (High fuel cost + Low income)

OA Index: Average fuel cost and percentage of population in income deprivation - FRESH 2016 (OA), WIMD 2016 (LSOA)



# C1

## Poor Health - Bad or very bad health

OA Quantiles: Percentage of residents with bad or very bad health - Census 2011 (OA)

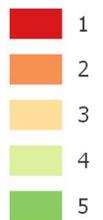
Rhondda Cynon Taf

Caerphilly

Newport

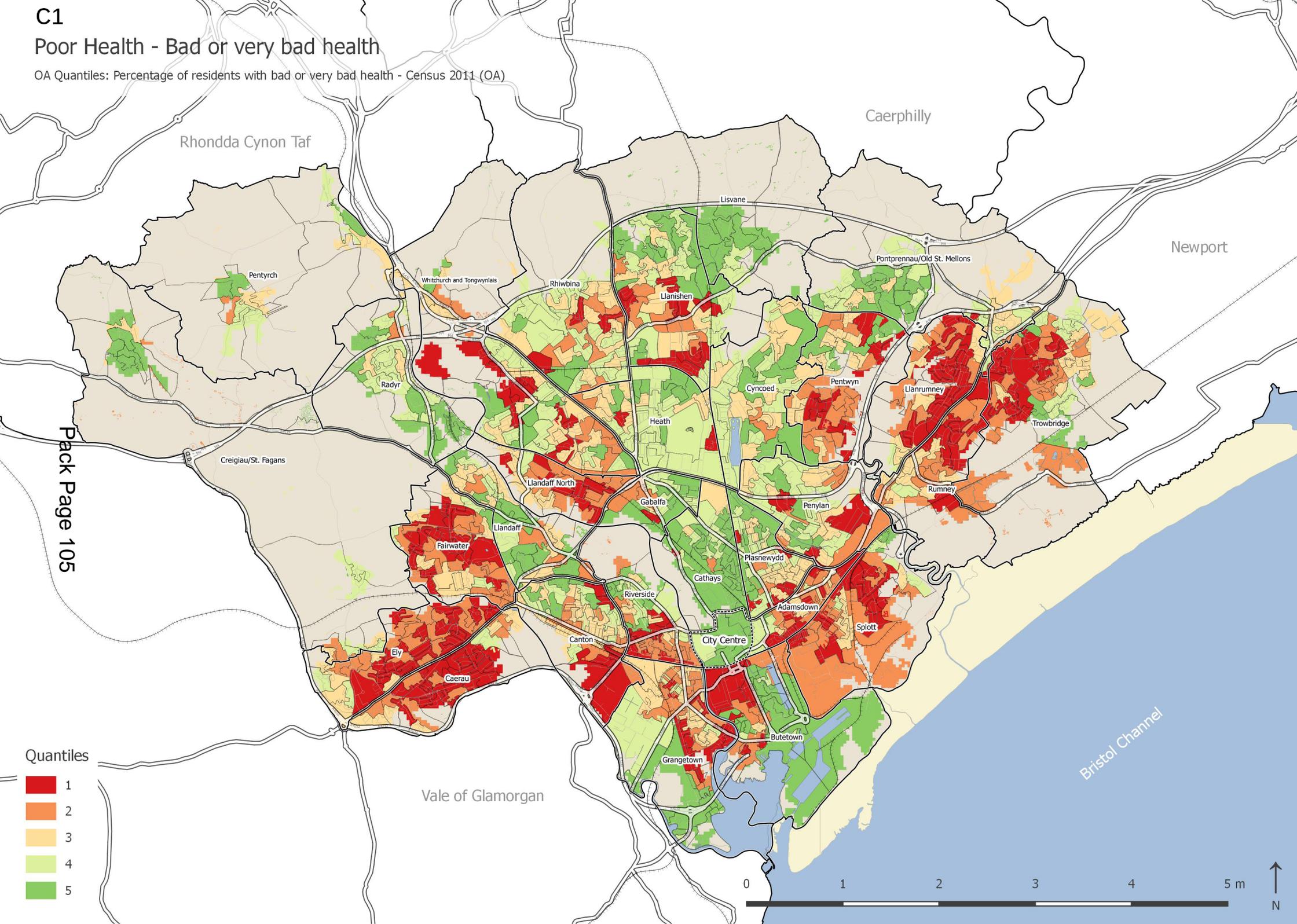
Pack Page 105

Quantiles



Vale of Glamorgan

Bristol Channel



# C2 Fuel Poor + Poor Health

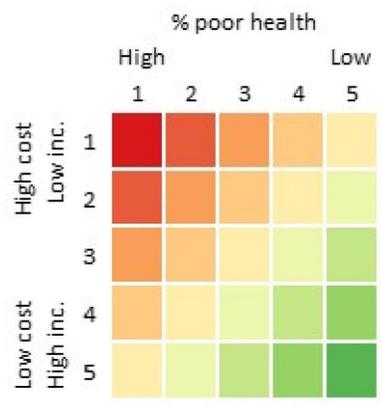
OA Index: Average fuel cost, percentage of population in income deprivation and percentage of residents with bad or very bad health - FRESH 2016 (OA), WIMD 2016 (LSOA), Census 2011 (OA)

Rhondda Cynon Taf

Caerphilly

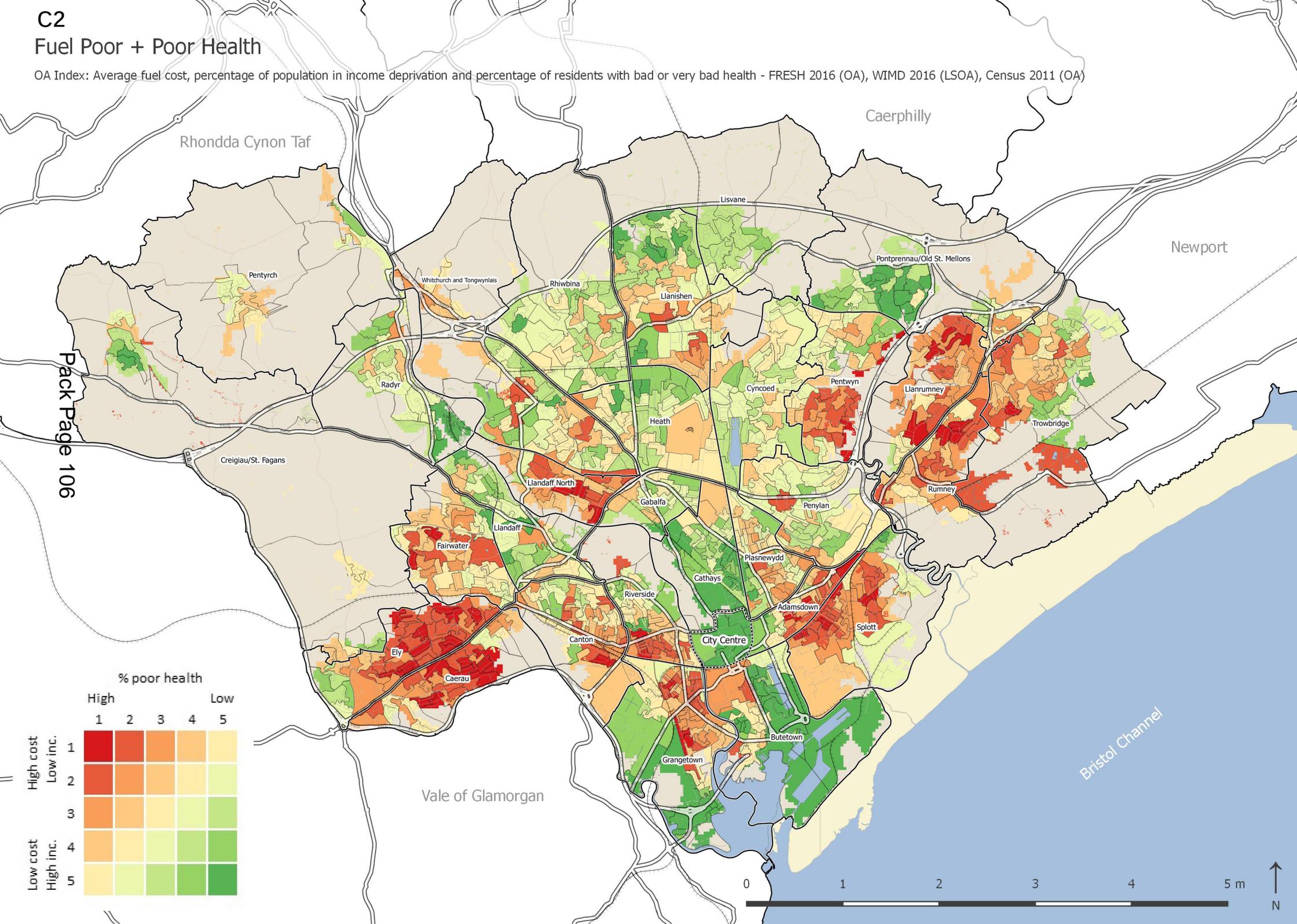
Newport

Pack Page 106



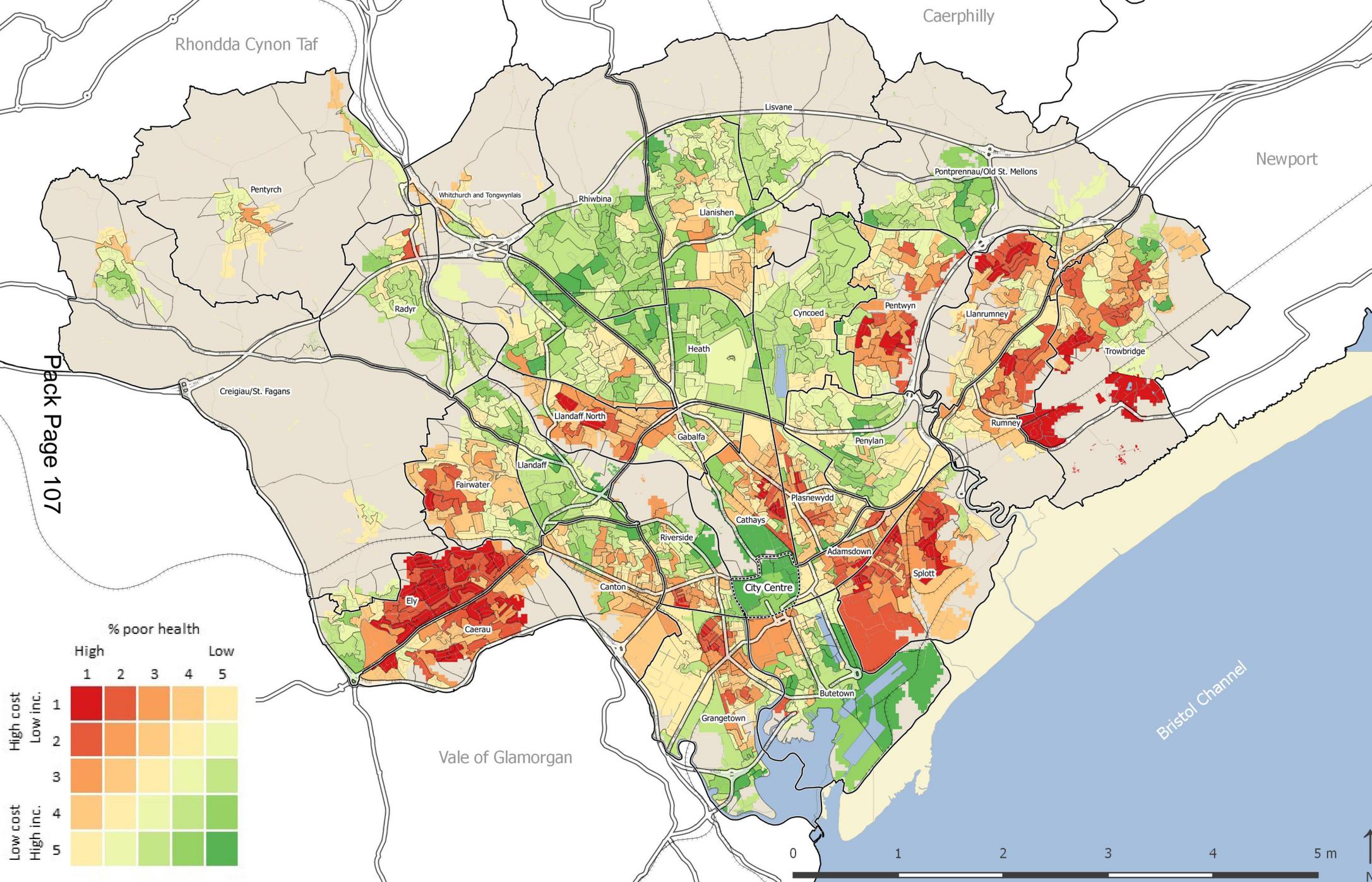
Vale of Glamorgan

Bristol Channel

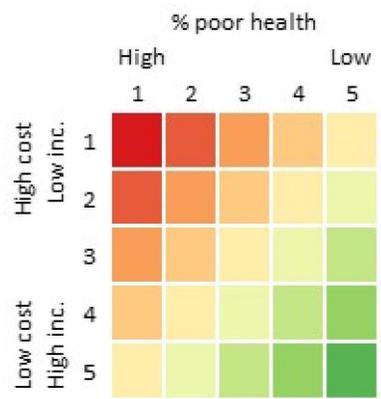


# D1 Fuel Poor : Children (age 0-18) + Poor Health (households with children)

OA Index: Average fuel cost, percentage aged 0-18 in income deprivation and percentage of households with dependent children and 1+ with a health problem - FRESH 2016 (OA), WIMD 2016 (LSOA), Census 2011 (OA)

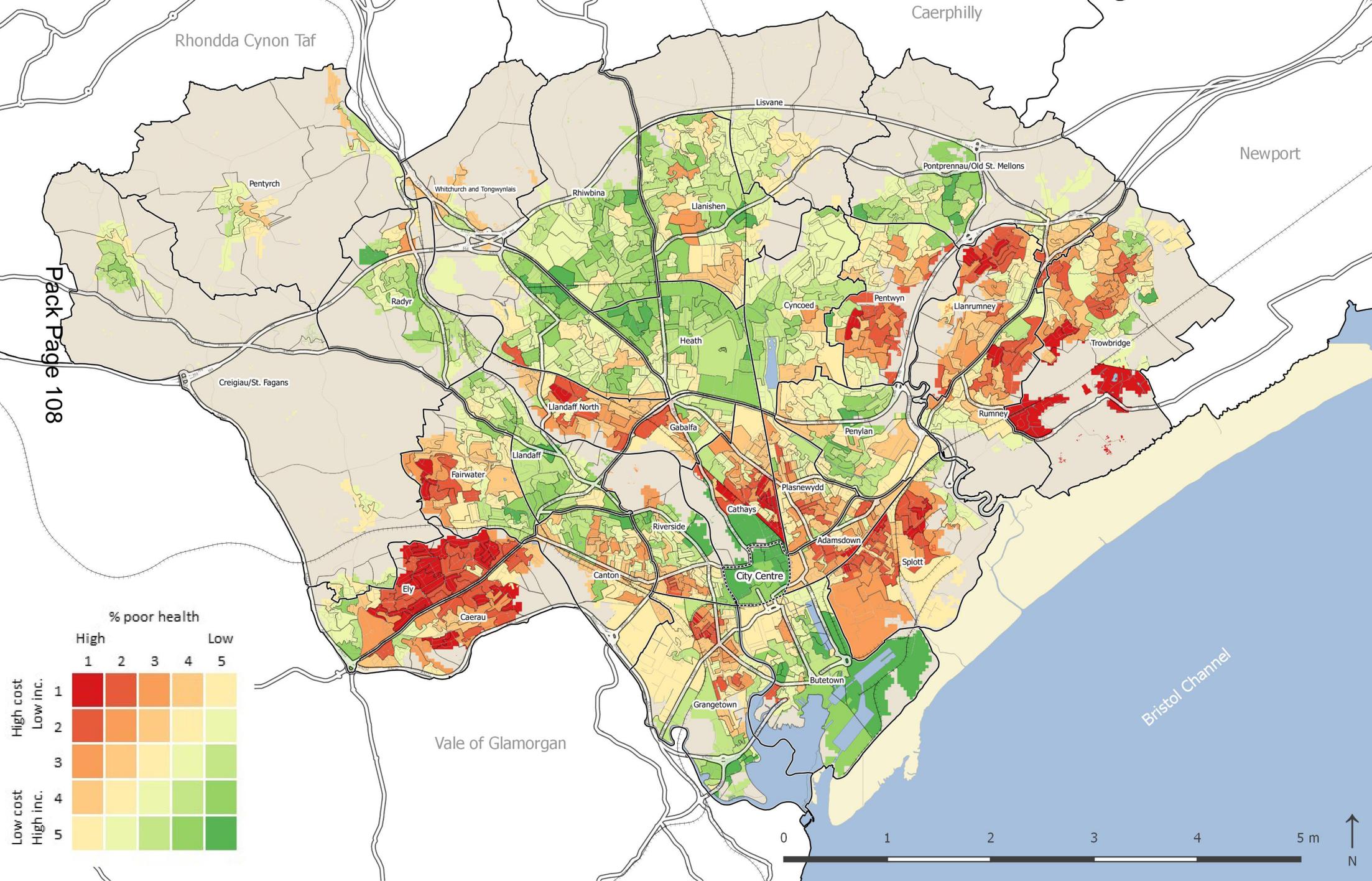


Pack Page 107



# Fuel Poor : Pre School Children (age 0-4) + Poor Health (households with children)

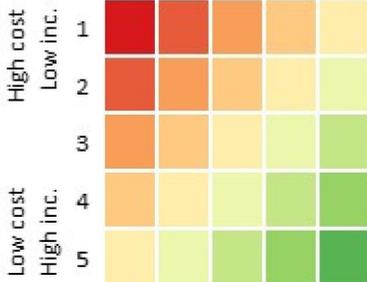
OA Index: Average fuel cost, percentage aged 0-4 in income deprivation and percentage of households with dependent children and 1+ with a health problem - FRESH 2016 (OA), WIMD 2016 (LSOA), Census 2011 (OA)



Pack Page 108

% poor health

High 1 2 3 4 5 Low

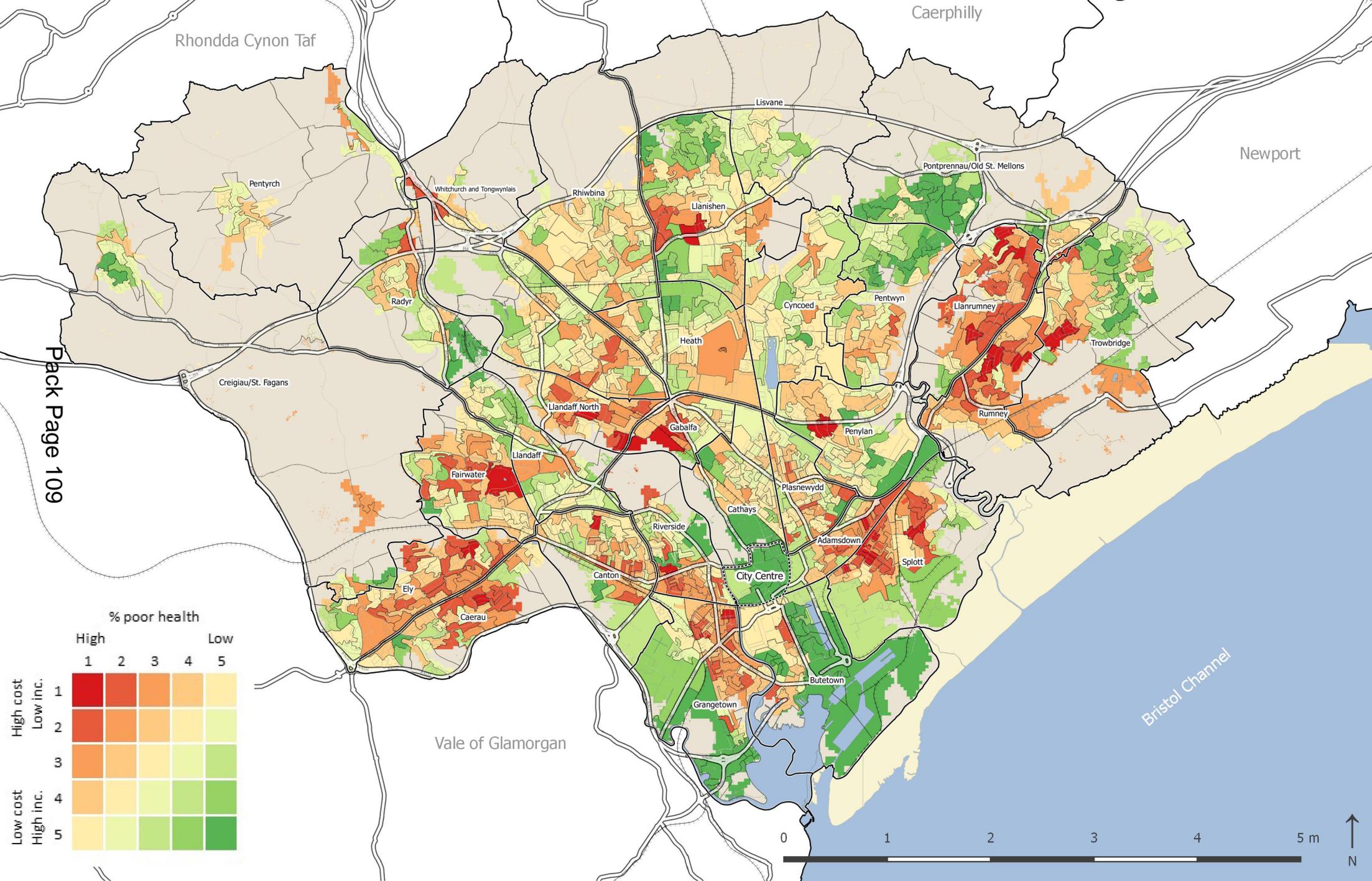


0 1 2 3 4 5 m

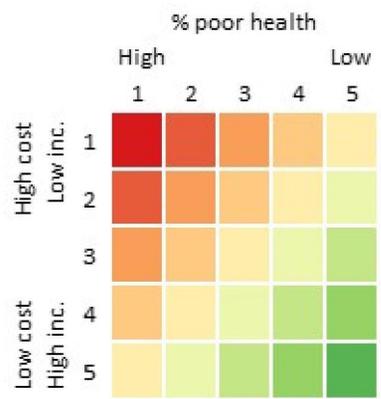


# D3 Fuel Poor : Elderly (age 65 and over) + Poor Health (age 65 and over)

OA Index: Average fuel cost, percentage of population over 65 in income deprivation and percentage of residents over 65 with bad or very bad health - FRESH 2016 (OA), WIMD 2016 (LSOA), Census 2011 (OA)



Pack Page 109



# Agenda Item 7

By virtue of paragraph(s) vii of Standing Order 17.42

Document is Restricted