

Agenda – Children, Young People and Education Committee

Meeting Venue:	For further information contact:
Hybrid – Committee room 2 Senedd and video conference via Zoom	Naomi Stocks Committee Clerk
Meeting date: 11 December 2024	0300 200 6565
Meeting time: 09.30	SeneddChildren@senedd.wales

Hybrid

Private pre-meeting

(09.15 – 09.30)

Public meeting

(09.30)

1 Appointment of a Temporary Committee Chair

(09.30)

2 Introductions, apologies, substitutions and declarations of interest

(09.30)

3 Scrutiny of Qualifications Wales Annual Report 2023 – 2024

(09.30 – 11.00)

(Pages 1 – 21)

David Jones, Chair, Qualifications Wales

Philip Blaker, Chief Executive, Qualifications Wales

[Qualifications Wales Annual Report 2023 – 2024](#)

Attached Documents:

Research Brief



Senedd Cymru
Welsh Parliament

4 Papers to note

(11.00)

4.1 Welsh Language and Education (Wales) Bill

(Pages 22 – 36)

Attached Documents:

Letter to the Chair of the Legislation, Justice and Constitution Committee
from the Cabinet Secretary for Finance and Welsh Language

4.2 Information from Stakeholders

(Pages 37 – 39)

Attached Documents:

Briefing note from the Bevan Foundation

4.3 Information from Stakeholders

(Pages 40 – 41)

Attached Documents:

Information from stakeholder

4.4 Welsh Language and Education (Wales) Bill

(Pages 42 – 46)

Attached Documents:

Additional information from Medr following the evidence session on 17
October 2024

4.5 Inter-Institutional Relations Agreement

(Pages 47 – 48)

Attached Documents:

Letter to the Chair of the Legislation, Justice and Constitution Committee
from the Cabinet Secretary for Social Justice, Trefnydd and Chief Whip

4.6 Welsh Government Draft Budget 2025–26

(Pages 49 – 53)

Attached Documents:

Consultation response from Coleg Cymraeg Cenedlaethol

4.7 Welsh Government Draft Budget 2025–26

(Pages 54 – 87)

Attached Documents:

Consultation response from Platform

4.8 Welsh Government Draft Budget 2025–26

(Pages 88 – 99)

Attached Documents:

Consultation response from Colegau Cymru

4.9 Information from Stakeholders

(Pages 100 – 114)

Attached Documents:

Letter to the Chair of the Children, Young People and Education Committee
from the Lesbian, Gay & Bisexual Alliance Cymru

4.10 Welsh Language and Education (Wales) Bill

(Pages 115 – 119)

Attached Documents:

Letter to the Chair from the Chief Executive of Coleg Cymraeg Cenedlaethol

4.11 Welsh Government Draft Budget 2025–26

(Pages 120 – 126)

Attached Documents:

Letter to the Chair of the Children, Young People and Education Committee
from the Chief Executives of Llamau

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

(11.00)

Private Meeting

(11.00 – 11.15)

6 Scrutiny of Qualifications Wales Annual Report 2023 – 2024 – consideration of the evidence

(11.00 – 11.15)

Agenda Item 3

Document is Restricted

Agenda Item 4.1

Mark Drakeford AS/MS
Ysgrifennydd y Cabinet dros Gyllid a'r Gymraeg
Cabinet Secretary for Finance and Welsh Language



Llywodraeth Cymru
Welsh Government

Mike Hedges MS
Chair
Legislation, Justice and Constitution Committee

15 November 2024

Dear Mike,

Welsh Language and Education (Wales) Bill

Thank for your letter dated 24 October, following my attendance at your Committee to provide evidence in relation to the Welsh Language and Education (Wales) Bill. I trust the Committee found the session to be informative.

The Annex to your letter poses a number of questions. My response to each of those questions are set out in the Annex to this letter.

I thank the Committee for their interest in this Bill and look forward to considering the Committee's report, in due course.

I am copying this letter to Buffy Williams MS, Chair of the Children, Young People and Education Committee.

Yours sincerely,



Mark Drakeford AS/MS
Ysgrifennydd y Cabinet dros Gyllid a'r Gymraeg
Cabinet Secretary for Finance and Welsh Language

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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.

Annex

1. Have you undertaken a human rights impacts assessment for this Bill and what was the outcome of that assessment?

During the Committee discussion both the human rights impact and the Children's Rights Impact Assessment were discussed together.

As with all Senedd Bill proposals, the Welsh Government carries out a full human rights assessment before introduction, this is done as part of the legislative competence consideration. We are satisfied that the provisions of this Bill are compliant.

Chapter 9 of the Explanatory Memorandum provides a summary of the impact assessments undertaken as part of the development of the Bill. The full impact assessments required for this Bill were published in the [Integrated Impact Assessment](#) to the Welsh Government's website upon introduction of the Bill on 15 July – this includes a Children's Rights Impact Assessment.

2. What does this Bill enable you to achieve that you cannot within the existing legislative framework?

The Bill will provide a coherent framework and clear direction of travel to drive the changes required to achieve our 2050 aim.

The Bill places a duty on the Welsh Ministers to prepare a Code to describe Welsh language ability. Such a duty on the face of the Bill provides clarity and cohesion in our national approach to describing Welsh language ability. Alongside this new approach, the Bill sets a duty on the Welsh Ministers to review the Welsh language standards. Placing this duty on the Bill indicates that the Code will also be considered in the context of the existing legislative framework.

Introducing a statutory system for school language categories and the requirement for a school to have a Welsh language education delivery plan, in comparison with the current non-statutory guidance on school language categories, will be key in driving schools to increase their Welsh language education provision where this is reasonably practicable. The plan will strengthen both the accountability aspect and the focussed support that can be provided by local authorities to ensure that sufficient progress is made towards their WESP targets set in the National Framework. The statutory categories will, through regulations, specify a minimum amount of Welsh language education provision alongside the Welsh language learning goals set in the Bill.

The Bill will provide the Welsh Ministers with the power to set statutory national targets as well as targets on local authorities to meet through their WESPs. This will bridge the gap that currently exists between the Cymraeg 2050 strategy target of one million Welsh speakers and the delivery of WESPs at local authority level.

The Bill also creates a statutory body to support people to learn Welsh, and facilitate their progress, so that more people (of all ages) are learning the language. There are currently no legislative measures with this role. Creating the Athrofa as a statutory body through this Bill therefore provides stability and a long-term approach to the lifelong learning of Welsh.

3. The Explanatory Memorandum states that this “is the first piece of primary legislation to be introduced for the purpose of realising the long-term objective” of the Cymraeg 2050 strategy. As the strategy was announced on 10 July 2017, why has it taken over 7 years to bring this legislation forward?

The Welsh Language and Education Bill is introduced in the context of the significant challenge of reaching a million Welsh speakers by 2050, as set out in our Welsh language strategy, *Cymraeg 2050*.

Those challenges require transformational changes to the way we think about the Welsh language, and that is why the strategy commits to reviewing the legislation which underpins the Welsh language to ensure it offers a strong foundation for promoting and facilitating the use of Welsh.

We see the role that education plays as being a key part on the journey towards a million Welsh speakers.

Whilst this Bill is the first piece of primary legislation to be introduced for the purpose of realising the long-term objective of the strategy, it is also important to note that this Bill is not the starting point. We made a deliberate decision to build an incremental approach to making changes to the system to build on the goodwill towards the language and to bring people with us. As such, many of the Bill’s provisions build upon work that has already taken place.

We introduced non-statutory guidance on school language categories in 2021, and those categories have been implemented in the PLASC since January 2024. In introducing that non-statutory guidance, the Minister's foreword stated that we would explore the benefits of making the categories statutory over the coming years.

While this Bill is the first primary legislation introduced since *Cymraeg 2050*, statutory action has also been taken with the introduction of the Welsh in Education Strategic Plans (Wales) Regulations 2019.

These regulations and the WESP regime have transformed the way local authorities plan their Welsh language education provision, and this Bill builds on the progress that has already been made.

We recognise that the current education system leads to vastly different linguistic outcomes, depending on the medium of education. We want the education system to embrace Welsh as a language that belongs to all pupils in Wales. We therefore propose in this Bill steps that will reduce the gap in linguistic outcomes of school pupils.

Building on both non-statutory and statutory actions taken since introducing *Cymraeg 2050*, we believe that now is the time to introduce this primary legislation as the next natural step as we work to realise our ambition of reaching one million speakers.

4. According to the Statement of Policy Intent, there is currently no policy intent to use several of the regulation-making powers in the Bill and the powers are there to “future-proof the Bill”. Can you therefore explain why such powers are included?

Language planning is a long-term pursuit, and our journey towards 2050 will require us to review progress and adapt over time as circumstances change.

In preparing the Statement of Policy Intent we have tried to provide as much information as possible to the Senedd committees about how and when we intend to use the subordinate making powers and duties that are contained in the Bill.

There are six occasions where we have set out that there is currently no intent to use the power or that there are no immediate or short term intention to use the power. The reasons why we have included the powers in the Bill are set out at Chapter 5 of the Explanatory Memorandum and in the Statement of Policy Intent. These examples are set out below

- i. Section 13(2) which provides the Welsh Ministers with a power to make regulations amending section 9 of the Bill in order to add or revise a language category and section 13(4) which states that any regulations made to add a language category need to include a Welsh language learning goal for that category. At present we are planning that there will be three statutory language categories as set out in the Bill. The power is required to enable the Welsh Ministers to respond to any future developments or responses to a consultation which indicate it would be desirable to add or revise a language category.
- ii. Regulations under section 14(2)(b)(vi) – this allows the Welsh Ministers to specify any person who must be consulted by a school's governing body when preparing a Welsh language education delivery plan. The power is required as it may be appropriate to add consultees if, for example, a new body is established that has an interest in school delivery plans, or another person needs to be added to the list of consultees in section 14(2)(b).
- iii. Regulations under section 14(4)(a) – (b)- these subsections allow the Welsh Ministers to make regulations to amend the duration of the period that a delivery plan has effect and make provision about the form and content of a delivery plan. The Bill provides that the delivery plan will have effect for 3 school years (s.14(3)). The power is required to allow the Welsh Ministers to amend the duration of the delivery plans at a future point if they are deemed too short or too long. The power in section 14(4)(b) could be used to provide more detail about what Welsh language education delivery plans should include and their form. This would enable consistency of approach by schools.
- iv. Regulations under section 20(2) – this power allows the Welsh Ministers to make regulations to make further provision in relation to the Welsh language education plans of community special schools. This power will be exercised as the regulations will give further details to allow community special schools to prepare Welsh language education plans. The details to be included in the plans may change over time, therefore this power is required to provide the Welsh Ministers with flexibility to make changes as the need arises. The Statement of policy intent will be amended to reflect the intention to use this power.
- v. Regulations under section 23(9) – this section provides the Welsh Ministers with a power to change what is required or permitted to be included in the National Framework for Welsh Language Education and Learning Welsh, as set out in sections 23(3) – (7) of the Bill. The power is needed to give Ministers the flexibility to vary the requirements as to what should be included in the National Framework, when necessary, in order to respond to new situations that may arise over time.
- vi. Regulations under section 53(1) - this section provides the Welsh Ministers with a power to make provision that is incidental or supplementary to any provision in

the Bill or that is consequential on any provision in the Bill, and to make transitional provision, transitory provision or saving provision in connection with any provision of the Bill. This power will be intended to enable the Welsh Ministers to make changes over time, to ensure that this Bill works together with other laws. It is therefore appropriate to introduce regulations to give the Welsh Ministers the flexibility to be able to adapt to unforeseen circumstances.

5. Can you confirm whether section 3(1) and 3(2)(b) confer regulation making powers or duties? The Statement of Policy Intent is inconsistent in its description.

Section 3(1) of the Bill imposes a duty on the Welsh Ministers to make regulations. Sections 3(2)(b) provides a regulation making power. My officials will correct the English version of the Statement of Policy Intent to ensure references are used correctly.

The descriptions in the Welsh version of the Statement of Policy Intent are correct.

6. Section 3(1) of the Bill enables the Welsh Ministers to make regulations specifying the data to be used in order to calculate the number of Welsh speakers. Section 3(2) then goes on to explain that, whether a person is a Welsh speaker is decided by self-assessment or, in the case of a child, on the basis of an assessment by their parent or carer or any other method specified by regulations. Can you explain to us the interaction between sections 3(1) and 3(2)? The Statement of Policy Intent indicates that section 3(2) is a limitation on the power in section 3(1), but this is not clearly set out on the face of the Bill.

Whether a person is a Welsh speaker for the purposes of sections 1 and 2 has to be decided in accordance with the provisions of section 3(2). Regulations under section 3(1) must specify the data that is to be used for calculating the number of Welsh speakers for the purposes of sections 1 and 2. Section 3(2) is a limitation on the power in 3(1) as the data used to count Welsh speakers must be linked to the meaning of Welsh speaker in 3(2).

For example, whether a person aged 16 or over is a Welsh speaker is to be decided on the basis of self-assessment (section 3(2)(a)). The data specified in regulations made under section 3(1) to calculate the number of Welsh speakers aged 16 or over would have to therefore capture those who have self-assessed themselves as Welsh speakers.

7. Section 10(1) of the Bill requires the Welsh Ministers to make regulations specifying the amount of Welsh language education provided for each language category. Section 13(1) enables the Welsh Ministers to make further provision about the school language categories. The Statement of Policy Intent states that it will be important to consult before making regulations; can you explain why there is no duty for the Welsh Ministers to consult on the face of the Bill?

We generally do not place duties in legislation to consult on subordinate legislation. The general public law requirements will apply. It is the Welsh Government's standard practice to consult publicly where appropriate to seek views on the subordinate legislation – and at the appropriate time to do so. As we have set out in the Statement of policy intent, we are of view that these regulations will require a public consultation.

8. Section 13(1) says the Welsh Ministers may by regulations make further provision about the school language categories. What are the limits of this “further provision” and why can you not be more specific about what this power will be used for?

Section 13 is limited by Part 3, and in particular by the provisions in section 9. This power is to make 'further provision'. In terms of what the power will be used for, the intention is to ensure that the Welsh Ministers have sufficient powers to respond to changing circumstances without having to amend primary legislation.

Specificity is provided in section 13(2) in terms of the potential amendments that may be needed to section 9 over time, but the wider power to make further provision in section 13(1) is a power to elaborate on the existing provision in section 9 – to provide more detail on language categories.

- 9. Section 13(5) requires the Welsh Ministers to decide whether to exercise their power to increase the minimum amount of Welsh language education provision for the Primarily English Language, partly Welsh category within 5 years of that power coming into force, and after that within 5 years of each period following their most recent decision. Can you confirm the intention behind this provision can the power be exercised as regularly as the Welsh Ministers determine - can the power be exercised as regularly as the Welsh Ministers determine, as long as no more than 5 years elapse between decisions as to whether it should be exercised?**

The power in section 13(2)(b) may be exercised at any point. The purpose of section 13(5) is to give an assurance that the Welsh Ministers will consider exercising that 13(2)(b) power every 5 years.

- 10. Sections 14(3), 29(1) and 44(8) specify that start dates for plans or planning periods shall be set out in regulations. If the dates are not set out on the face of the Bill, is there a danger that the powers may not be exercised and that the provisions are not commenced?**

There is no danger that these powers may not be exercised. The School delivery plan and the local Welsh in Education Strategic Plans are key elements in the implementation of the Bill.

I am of the view that it is appropriate that the Welsh Ministers specify the start date for the first 5-year period of the local Welsh in education strategic plan in regulations (section 29(1)), as their preparation is dependent on the date of publication of the National Framework for Welsh Language Education and Learning Welsh. The Welsh Ministers have a duty to lay the first National Framework before the Senedd before 31 July 2028 (section 26(3)). This is the latest date for laying the National Framework. It can, if circumstances permit, be laid sooner than that. It is therefore appropriate to offer flexibility in setting the first date for the local Welsh in education strategic plan in secondary legislation.

In a similar way, I consider it to be appropriate to allow the Welsh Ministers the flexibility to specify the school year in which the first school delivery plan starts by regulations (section 14(3)) to ensure that the statutory language categories are operational (that is, the amount of Welsh language education provision for each category under section 10(1)) and to allow the relevant local Welsh in education strategic plan to be considered (s14(2)(a)).

The National Institute for Learning Welsh must prepare a strategic plan, therefore the Welsh Ministers will exercise the power in section 44(8)(a) detailing the first planning period. Subsequent planning periods will last 3 years unless the Welsh Ministers make regulations specifying a different period under the regulation making power in section

44(8)(b). Regulations give the Ministers the flexibility to set the planning phases for the Institute as necessary.

As these examples illustrate, there are a number of interdependencies in terms of the sequencing of various aspects of the Bill. At the Committee session I offered to share with you the current high-level implementation milestones, which is provided alongside this letter in a tabular format at document 1 and as a visual at document 2. In sharing these documents, I wish to highlight to the Committee that these dates represent the current planning assumptions. Further work will be undertaken over the coming months in relation to the detailed implementation arrangements. The indicative timetables do not set out the entirety of the work required to implement the Bill e.g. there will be a need to prepare additional items of subordinate legislation such as Commencement Orders.

11. Why is “lifelong” in brackets in section 23(1)(b), and “national” in brackets in section 23(5)(b)?

In section 23(1)(b) the brackets are intended to provide clarification that Welsh language learning has a broader more general meaning than has been used in the Bill so far, it is not limited to Welsh language learning in a compulsory school age setting.

Similarly, in section 23(5)(b) brackets are used to provide clarity that targets in this paragraph are to reflect the national targets, not local targets referred to in section 23(5)(a).

12. Section 28(3)(a) requires a local Welsh in education strategic plan to include “information on the education practitioners working in the local authority’s area”. The term “information” is vague – what information do you envisage the local Welsh in education strategic plan including and why is appropriate detail not included on the face of the Bill?

This could include numbers of practitioners or their Welsh language ability, or age. The intention is that regulations under section 33 will be able to provide more detail on what is required to be included in the local Welsh in education strategic plan. This could change as time goes on - our journey towards 2050 will require us to review progress and adapt over time as circumstances change.

13. Sections 30 and 32 allow the Welsh Ministers to issue directions to local authorities in relation to local Welsh in education strategic plans that they have prepared. No procedure is applicable to such directions. Given that this power allows the Welsh Ministers to interfere with a subjective decision making process of the local authority, why is it not subject to a scrutiny procedure?

Sections 30 and 32 of the Bill are direction-making powers that are “executive” in nature, as opposed to being quasi-legislative. Where primary legislation makes provision about the power to make directions of this kind it is not usual for such directions to be subject to a procedure in primary legislation.

14. Section 33 of the Bill contains a power for the Welsh Ministers to make regulations relating to a wide range of matters relating to local Welsh in education strategic plans, as listed in the Statement of Policy Intent.

a. Given the breadth of this power, do you consider that it would be more appropriate to subject it to the affirmative scrutiny procedure?

A number of key concepts relating to the local Welsh in Education Strategic Plans (WESP) are legislated for in the Bill, for example:

- what must be included in the WESP,
- the duration of the WESP and
- who must be consulted.

The power in section 33 enables the Welsh Ministers to make further provision about the plan, but those matters are largely technical and administrative in nature and supplement what is in the Bill, for example:

- the timing of the plan (but not its duration),
- consultation process, and
- approval process.

This would lean towards a negative procedure, as set out in the Welsh Government's guidelines on subordinate legislation.

There is also scope under the power for the regulations to make provision about the content of the plan, which will build upon the express requirements in section 28, and allows the Welsh Ministers to make specific and more detailed provision (as is the case in the current WESP Regulations).

It would also allow the Welsh Ministers to respond to changes in circumstances and priorities over time. That power will be limited by the scope of section 28 – the provisions in the regulations about the content must fall within the ambit and scope of section 28.

Using of the Negative procedure replicates the existing procedure in the School Standards and Organisation (Wales) Act 2013. I consider that a negative procedure is justifiable on the basis that it follows existing practice and legislation.

b. In section 33(2), what do you mean when you say regulations could “apply sections 28 to 32 with modifications” for the purpose of producing joint local Welsh in education strategic plans – what would such modifications look like?

This applies where local authorities are permitted to prepare joint plans as a result of regulations made under section 33(2). In such a scenario it may be necessary to modify some of the requirements of sections 28 to 32 to reflect the joint nature of the plan and that it will cover more than one authority's area. It may also be necessary to modify in order to reflect the separate targets the local authorities will receive in the Framework.

This reflects the power in the current WESP statutory framework (section 87 of the School Standards and Organisation (Wales) Act 2013).

c. Why is there no detail on the face of the Bill relating to joint local Welsh in education strategic plans?

Dealing with joint plans in regulations means that consultation can be undertaken about what kind of joint plans might be sought. That might be different in different parts of Wales. Having a regulation making power will allow a more purposeful and specific mechanism for such plans. This reflects the power in the current WESP statutory framework (section 87 of the School Standards and Organisation (Wales) Act 2013).

15. Paragraph 2 of Schedule 2 to the Bill allows the Welsh Ministers to make regulations that vary the number of members of the new National Institute for Learning Welsh. The Explanatory Memorandum states that this is subject to the negative scrutiny procedure, but as the power can only be exercised to amend paragraph 2(1) of Schedule 2, can you confirm that it is in fact subject to the draft affirmative procedure in accordance with section 52(4)(b)?

We agree with the Committee that regulations made under paragraph 2(4) of Schedule 2 to the Bill would amend paragraph 2(1) of Schedule 2 to the Bill, as it is a power to amend a provision in the Welsh Language and Education (Wales) Act. We agree that the effect of section 52(4)(b) is that the affirmative procedure applies to the regulations. We will consider whether an amendment is required to section 52(4)(a) of the Bill and will amend Table 5.1 of the Explanatory Memorandum to ensure it reflects the text of the Bill.

16. Paragraph 18 of Schedule 2 to the Bill deals with the obligations of the Auditor General for Wales in relation to the new National Institute for Learning Welsh. Can you provide us with the details of any consideration you gave as to whether paragraph 18 complies with paragraph 5(3) of Schedule 7B to the Government of Wales Act 2006?

Paragraph 18 of Schedule 2 to this Bill provides a power for the Auditor General to carry out a financial examination, states that policy objectives are outside the scope of the discretion provided to the Auditor General, and provides what the Auditor General must do before and after conducting a financial examination. There is no provision in paragraph 18 controlling or directing the use of the Auditor General's financial examination functions and the provision complies with paragraph 5(3) of Schedule 7B to the Government of Wales Act 2006.

17. Paragraph 15(4) of Schedule 2 allows the Welsh Ministers to specify the responsibilities that the accounting officer of the new Institute will have. How are these responsibilities to be specified in practice and will the Senedd have the opportunity to scrutinise them? Why can they not be definitively listed on the face of the Bill, rather than the non-exhaustive list in paragraph 15(5)?

The Athrofa will be a Welsh Government sponsored body, operating at arm's length from government but within a strategic planning and funding framework established by the Welsh Ministers. This framework will mirror the standard framework document for a Welsh Government Sponsored Body and will detail the terms and conditions under which the Welsh Ministers provide resources to the Athrofa, the roles and responsibilities of the Welsh Ministers and the Athrofa as well as the relationship between them. This includes the roles and responsibilities of the Accounting Officer (AO) and individual Board members.

The AO will have specific responsibilities for the propriety and regularity of the public finances for which they are responsible which will be included in a separate memorandum under the framework, including their accountability to the Senedd, the Welsh Government and the Athrofa's board. The Accounting Officer's responsibilities are derived originally from the Treasury - and the Permanent Secretary has a role in ensuring that the responsibilities of the Accounting Officer reflect those responsibilities. The Senedd has no power to intervene in that regard.

The reason for providing a non- exhaustive list is to give broad parameters of the role but also provide flexibility in relation to the chief accounting officer's functions that are agile enough to reflect Welsh Ministers' evolving requirements on financial accountability

within the funding framework. Quite often, primary legislation does not say anything at all about the duties of the Accounting Officer when setting up a new statutory body, so the aim of paragraph 15 is to give a broad indication of what those duties will be without being unduly prescriptive.

In addition, general accounting principles apply to bodies handling Government funds.

18. The Bill uses the term “Welsh language education” which is defined separately in section 8(2)(a) for Part 3, and section 35(a) for Part 4. Both definitions are the same. The term is also used in sections 1(1)(c)(i) and 39(2) but is not defined for those purposes. Why was one definition not inserted into section 49(3) of the Bill which would then apply throughout the Bill, and do you agree that the lack of a definition for ‘Welsh language education’ in sections 1(1)(c)(i) and 39(2) could cause confusion in interpretation?

We agree that the term “Welsh language education” is not defined in sections 1(1)(c)(i) and section 39(2). We will consider this matter further.

19. Section 50 deals with the publication of documents, and states that where a person has a duty to publish a document electronically and they have their own website, the document has to be published on that website. Where is it to be published if they do not have their own website?

The provision is similar to section 171 of the Local Government and Elections (Wales) Act 2021. Welsh Government policy at the time was that where a duty to publish electronically fell on a community council under that Act and that community council did not have a website they could ask the local authority to publish the material on their website.

In this context, if a school did not have a website they could ask the local authority to publish it. In relation to the Local Government and Elections (Wales) Act 2021, there were no concerns that the bodies on whom that duty was imposed would have any problems discharging it.

On the duty to publish “electronically”, a school could also publish documents via an app and section 50(1) allows for that. Other digital or social media platforms may also be used in the future.

20. These further points have been identified in relation to the Statement of Policy Intent and the Explanatory Memorandum:

a. In the English language version of the Explanatory Notes, which are included in Annex 1 to the Explanatory Memorandum, in relation to section 11, the description in the table entry for the Welsh language learning goal of Primarily English Language, partly Welsh schools states that ‘By a date specified by the Welsh Ministers by regulations, that pupils are basic users...’ however this does not reflect the drafting of section 11(3)(a). The Welsh language version of the Explanatory Notes read ‘Hyd at ddyddiad’, meaning ‘Until a date.’

My officials will correct the English language version of the Explanatory Memorandum to reflect the drafting of the Bill and to ensure both language versions of the Explanatory Memorandum are consistent.

b. The Statement of Policy Intent on pages 14 and 18, in relation to sections 10(1), 10(2), 13(2) and 13(4), says that ‘Section 13(5) states that the Welsh Ministers

must decide every 5 years whether to revise/amend the language categories'. However, section 13(5) requires the Welsh Ministers to decide every 5 years whether to exercise the power to make regulations under section 13(2)(b), which is the regulation making power to increase the minimum amount of Welsh Language education provision for the "Primarily English Language, partly Welsh" category.

We agree with the Committee in this respect and my officials will amend the Explanatory Memorandum.

- c. In relation to section 16(6)(c), Table 5.2 of the English language version of the Explanatory Memorandum states that it is a power conferred on the Welsh Ministers, when it is in fact conferred on local authorities. The Welsh language version of the Explanatory Memorandum is correct.**

My officials will correct the English language version of the Explanatory Memorandum to reflect the drafting of the Bill and to ensure both language versions of the Explanatory Memorandum are consistent.

- d. In relation to section 20(4), Table 5.1 in the Explanatory Memorandum states that 'It imposes a duty to make provision, in relation to voluntary designation, including modifying Part 3 of the Bill' and 'The power enables the Welsh Ministers to amend primary legislation', however, the power is to make regulations that apply Part 3 with modifications, it is not a power to amend primary legislation.**

We agree with the Committee in this respect and will amend the Explanatory Memorandum to ensure that is clear the power does not enable the Welsh Ministers to amend primary legislation. It is a power to apply Part 3 of the Bill with modifications where a community special schools voluntarily designate a language category. I confirm the regulations will be made under the Affirmative procedure as set out in section 52(4)(b) of the Bill.

- e. In relation to section 23(9), Table 5.1 in the Explanatory Memorandum states that 'The power enables the Welsh Ministers to amend the impact of primary legislation', however the power in section 23(9) enables Welsh Ministers to amend primary legislation, not merely its impact.**

We agree with the Committee and my officials will amend the Explanatory Memorandum to set out that the power enables the Welsh Ministers to amend primary legislation.

- f. In relation to sections 28(4)(b)(ix) and 29(1)(a), in the Statement of Policy Intent, there are references to a 'section' of the Welsh in Education Strategic Plans (Wales) Regulations 2019 as opposed to 'regulation'.**

My officials will amend these references.

- g. In relation to paragraph 3(f) of Schedule 2, Table 5.1 of the Explanatory Memorandum states that 'The power enables the Welsh Ministers to amend primary legislation', however the power is to specify, in regulations, the holder of an office, or a member of a body or a member of staff of a body that are disqualified from being a non-executive member of the National Institute for Learning Welsh; these regulations will not amend primary legislation.**

We agree with the Committee that the proposed draft affirmative regulations will specify persons but will not change the text of the primary legislation. My officials will make this clear in the Explanatory Memorandum.

Can you confirm that these points will be addressed and that the Statement of Policy Intent and the Explanatory Memorandum will be amended accordingly?

I am happy to confirm that changes will be made to the Explanatory Memorandum ahead of laying it before the Senedd following Stage 2 proceedings. I will also make a revised version of the Statement of Policy Intent available to your Committee and the Children, Young People and Education Committee at that time.

21. Finally, while a response will not be required in respect of the matters set out below, we wish to bring them to your attention:

- a. In section 32(4), the word “Minsters” should instead be “Ministers”.**
- b. In section 37(3)(d), the word “on” after “National Framework” should instead be “for”.**

I am grateful to the Committee for raising these issues and agree with the Committee that these corrections should be made.

Indicative timeline for implementation of the Bill

This document reflects the current planning assumptions for the implementation of the Bill and will be updated as we continue to work on the Bill's implementation and as dependencies between activities are identified.

Year	Financial year	Date	Activity
1	2025-26	May/June 2025 (Upon Royal Assent)	Duty on the Welsh Ministers to include the Million Welsh Speakers target in strategy on promoting and facilitating the use of Welsh under section 78 of the Government of Wales Act 2006 comes into force. [This is already in place therefore, there will be no action required to implement].
		October 2025	Consultation on the Code
2	2026-27	July 2026	Finalise Code
		October 2026	Consultation on the language categories and WESP regulations
3	2027-28	July 2027	Finalise regs relating to language categories and WESPs
		July 2027	Complete review of standards
		August 2027	Establish National Institute of Learning Welsh
		October 2027	Consultation on the revised Welsh Language Strategy (to include targets on use, education and other requirements of section 1 of the Bill) and the National Framework.
4	2028-29	July 2028	Publication of the revised Welsh language Strategy and the National Framework
		August 2028 onwards	Local Authorities prepare the new WESP
5	2029-30	July 2029	Welsh Ministers approve the new WESP
		August 2029 onwards	Schools prepare Delivery Plans (taking the WESP into account)
6	2030-31	July 2030	Deadline for Local Authorities to approve the Delivery Plans (including school categories)
		August 2030	School Delivery Plans in place
7	2031-32		
8	2032-33	October 2032	Revise the National Framework
9	2033-34	January 2033	2nd Delivery Plan submitted to local authority for agreement
		July 2033	End of Delivery Plans (and end of first exemption, if applicable)

10	2034-35		
11	2035-36	July 2036	End of any further exemption

Welsh Language and Education (Wales) Bill

Indicative Timeline for Implementation of the Bill

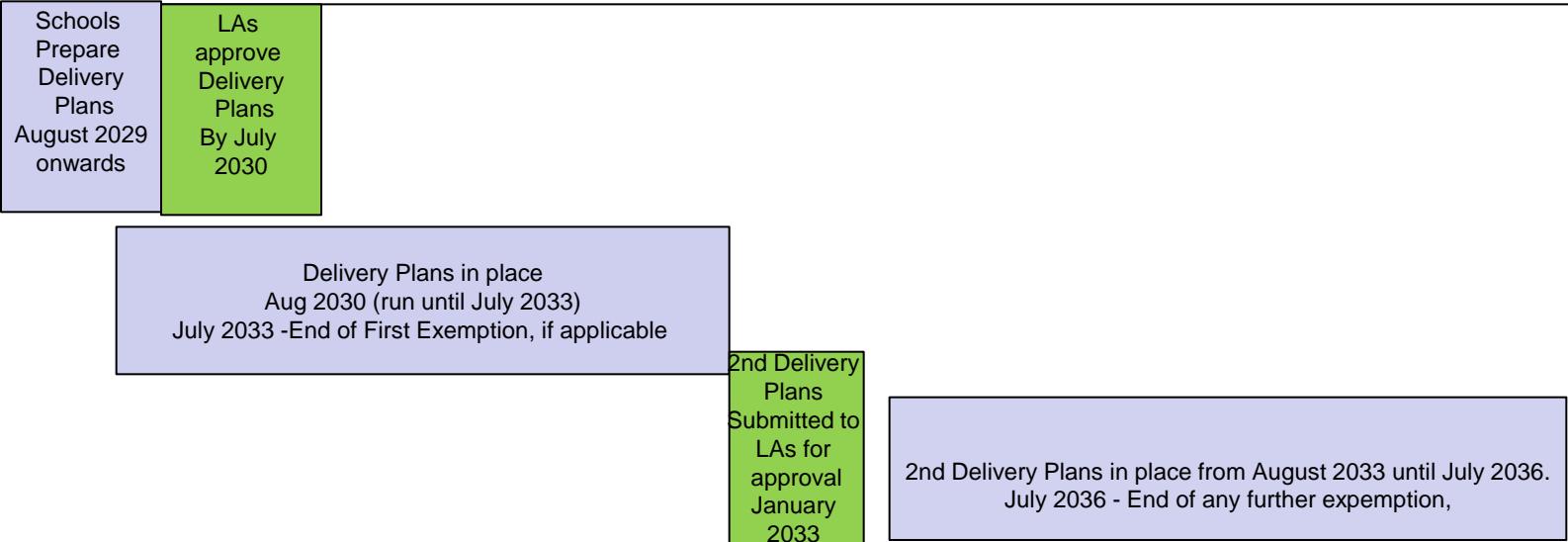
Key	
	Activity for Welsh Ministers
	Activity for Local Authorities
	Activity for schools
	No activity required to implement



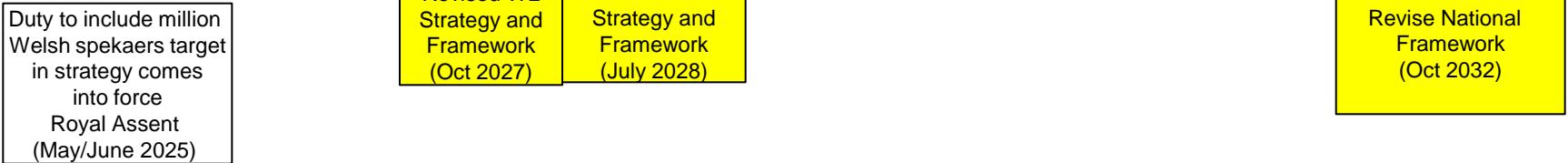
Code

Consult on Code Oct 2025	Finalise Code July 2026
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Language categories
Sick Page 36



Strategy and Framework



Other





Free School Meals and No Recourse to Public Funds in Wales – Briefing 2: challenges

Free School Meals (FSM) are available to eligible children attending a maintained school in Wales. Eligibility is based on household income, measured by receipt of certain benefits or asylum support, and the immigration status of a child's parents.

At the time of writing, children whose household is subject to a No Recourse to Public Funds (NRPF) restriction are not eligible for Free School Meals in Wales. However, Free School Meals are not a public fund for UK immigration purposes.

Why have we produced this briefing?

In October 2024, we launched our campaign for [Fair Free School Meals](#) in collaboration with the NRPF Coalition Wales, and supported by the Children's Commissioner and the Future Generations Commissioner. This campaign calls for the extension of FSM to all children from low-income households, regardless of the immigration status of their parents. Since launching the campaign, we have engaged in discussion with people working in civil society, local authorities, and Members of the Senedd. This briefing addresses the key concerns and questions raised in our conversations.

For more information on Free School Meals (FSM) and NRPF in Wales, including an outline of the Bevan Foundation's concerns and why we believe that it is essential for Welsh Government to extend eligibility for FSM to children affected by No Recourse to Public Funds, please see our previous briefing on FSM and NRPF, [Free School Meals and No Recourse to Public Funds in Wales: a briefing](#).

Why permanently extend free school meals to children with NRPF?

A fuller list of concerns can be found in our previous briefing. Essentially:

- Children in Wales are routinely excluded from accessing free school meals (FSM) by their parents' no recourse to public funds (NRPF) condition¹. Even if their household income is zero, children are going hungry while their peers are fed.
- Restricting eligibility for FSM on the basis of a parent's immigration status results in discrimination on the grounds of race.
- Free school meals are not a public fund for immigration purposes. They are a valuable resource in tackling child poverty. Lack of access to FSM also restricts access to the School Essentials Grant.
- Our research shows that providing free school meals via local authority discretion simply is not working. Children with NRPF continue to go without food at lunchtime. Only extending eligibility can provide a clear path to food at school.

Can Welsh Government change policy on FSM without changing the law?

Some people we spoke to believed that changing policy on FSM would require a change in the law. In Senedd Plenary on 14 July 2021, the then Minister for Education and the Welsh Language, Jeremy Miles, stated:

“It is unacceptable... that many families with no recourse to public funds also are living in extreme poverty. Changing the eligibility criteria for free school meals in these circumstances would require primary legislation to be amended. However, I strongly encourage local authorities to exercise their discretion to allow the children of these families to benefit from free school meal provision, and to claim the costs of doing so from the Welsh Government.”

Free School Meals are not a public fund and there is nothing in immigration legislation which restricts families with no recourse to public funds from accessing them. In 2020, the UK Government temporarily extended eligibility for free school meals to include some families with NRPF. In 2022, this was made permanent in England and was extended to all families with NRPF whose household income was below a minimum income threshold. This was done via policy change and without any amendment of primary legislation. Serious questions should be raised if devolved governments are not able to make a similar policy change where no restriction exists in immigration law.

Who would pay for extended Free School Meals?

We believe that Welsh Government should pay the cost of free school meals. Fair reimbursement of the cost of extending eligibility, including revenue costs, capital costs (which are likely to be minimal given the relatively low numbers), and the cost of resulting eligibility for other programmes provided or administered by Welsh Government, is essential. This will enable local authorities to provide FSM to all children on low incomes, and make it more likely that they facilitate and promote access. It will ensure that local authorities with higher numbers of children affected by NRPF can provide fair free school meals on an equitable basis.

Wouldn't extending eligibility to children with NRPF cost a lot?

In 2023-24, 90,108 children in Wales were eligible for FSM². In our previous briefing, we estimated that there are about 1,500 children in secondary schools who are from low-income households and are affected by No Recourse to Public Funds. This is a generous estimate, based on limited availability of migration statistics. It represents less than a 1.7% increase in numbers.

How would extending eligibility affect access to other programmes?

Children who apply for and are granted FSM will become eligible for other programmes such as the Schools Essential Grant. This would represent an additional but very small cost to Welsh Government, but would make a significant

difference to children living in poverty. For children registering for FSM, schools and their pupils would also benefit from increased payments under the Pupil Development Grant.

Shouldn't we ask instead for universal rollout of FSM in secondary schools?

While we support universal Free School Meals in secondary schools, children affected by NRPF cannot afford to wait for the implementation of such a scheme. It is vital that children in poverty get the help – and the food – that they need now.

We are calling for Welsh Government to quickly and permanently extend eligibility for free school meals to children with NRPF.

This would bring eligibility for FSM in line with UK government provision in England and is the only way to protect children's rights, provide equitable access, and ensure that **no child** goes hungry in school.

¹ What Am I Supposed to Do? Living with no recourse to public funds in the Nation of Sanctuary, Bevan Foundation, 2024, <https://www.bevanfoundation.org/wp-content/uploads/2024/02/Living-with-NRPF-in-the-Nation-of-Sanctuary-V2-FINAL-REPORT.pdf>

² StatsWales, Pupils eligible for free school meals by local authority, region, and year <https://statswales.gov.wales/Catalogue/Education-and-Skills/Schools-and-Teachers/Schools-Census/Pupil-Level-Annual-School-Census/Provision-of-Meals-and-Milk/pupilseligibleforfreeschoolmeals-by-localauthorityregion-year>

For further information, please contact:
lsata.kanneh@bevanfoundation.org

Citation

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Agenda Item 4.3

Welsh Government Draft Budget 2025-26

Email received from an individual

I am writing to you in your capacity as Chair of the Children, Young People, and Education committee to ask for your support to advocate for the Welsh Government to prioritise families in its upcoming budget by introducing a comparable childcare offer to that in England.

You may have seen that it was announced recently that Birth Rates have fallen significantly in 2023, And that Wales received the largest declines in Total Fertility Rate compared with 2022.

<https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/livebirths/bulletins/birthsummarytablesenglandandwales/2023>.

Although we both now earn wages that are just above average, due to increased interest rates on our mortgage, and not having family nearby, having a child in Wales would currently be completely out of reach financially due to the lack of childcare support. In England, parents are eligible for 15 hours of free childcare from when your child is 9 months old and this increases to 30 hours when they turn 3, whereas in Wales there is no support in our postcode until a child turns 3 years old. With childcare costs being so high we would be looking at nearly 16k per year on childcare, or around 1,300 per month, which is completely unattainable for us- whereas in England we would be paying just over half of this. Currently selling our home we worked so hard to save for as first time buyers and leaving our home nation of Wales to relocate to England would be the only way for us to afford a child. Alongside wider cost of living pressures and additional taxation on many young people through student loans, we really emphasise with the decreased birth rate in our nation, and remaining child free is the most likely option we will have to take.

We also note that, despite living in a property that is significantly under the average house price in XXXXXXX, we are not eligible for any additional childcare support via Flying Start, so this initiative does seem like a bit of postcode lottery.

While we were pleased to see the change of government in Westminster this year, we hoped that it would lead to a comparable childcare offer being introduced in Wales but so far the Welsh Government has not indicated this as a priority. Now that the UK government has announced an additional £1.7bn through the Autumn budget, I really hope this will now be reconsidered. Would you please raise this issue in Committee and advocate for the introduction of a childcare offer in Wales comparable to that in place across the border, through the December budget?

This issue has also been highlighted recently in media coverage
<https://www.bbc.co.uk/news/articles/cm2717g8g39o>.

I would really appreciate your consideration of this issue of cross border fairness that is impacting families and hope that you would consider advocating for the many parents in Wales not currently receiving support, and by extension for those of us who would love to have children but simply can't afford to while living in our home of Wales.

Buffy Williams MS
Chair
Children, Young People and Education Committee
Welsh Parliament,
Cardiff Bay,
Cardiff
CF99 1SN

21 November 2024

Dear Chair,

Further to Medr's evidence session to the Children, Young People and Education Committee (the Committee) on 17 October, please find a note setting out:

- where amendments identified in our written evidence could provide opportunities to strengthen the Welsh Language and Education Bill (the Bill).
- further information on the likely resources needed to upskill the workforce to deliver the Bill's ambitions

We ask the Committee to note that we have been engaged in a positive dialogue with Welsh Government officials regarding our written evidence since our submission to the Committee.

Amendments to the Bill

Evidence

Section 14 of the Bill proposes that schools will be required to prepare a Welsh language education delivery plan. In our evidence to the Committee we set out (paragraph 3.4) that:

School based sixth forms are critical to the delivery of Welsh medium education and ensuring that the language thrives. However, those sixth forms cannot be separated from an overall school's function and there is a risk that in taking a school approach to Welsh language delivery, which is the correct approach, without recognising Medr's duties in relation to sixth-form provision risks increasing incoherence.

Rydym yn croesawu 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 correspondence in Welsh. Any correspondence in Welsh will be answered in Welsh, and corresponding in Welsh will not be a barrier to responding.

2 Cwr y Ddinas
Stryd Tyndall
Caerdydd CF10 4BZ

2 Capital Quarter
Tyndall Street
Cardiff CF10 4BZ

Proposed amendment

The explanatory memorandum sets out in the context of the requirement in section 14 that when a school with a sixth form prepares a Welsh language delivery plan, it must take into account Medr's regulatory requirements. We propose that reference to sixth-form compliance with the requirements contained in any Learner Engagement Code published by Medr is added.

Evidence

Part 4 of the Bill introduces the concept of a National Framework (the Framework). It is not clear in the Bill how the Framework will take account of tertiary education, despite explicitly setting out that tertiary education will be within the scope of the Framework (section 23 (1)(4) refers). We note Welsh language education is defined in this part of the Bill in the context of compulsory education only; this suggests that the scope of tertiary education in the Framework is in the context of Welsh language learning (undefined) and acquiring the Welsh language.

Proposed amendments

Define Welsh Language Learning more clearly in Part 4 of the Bill.

In the relevant parts of the explanatory memorandum, set out the role of Medr in relation to Welsh as a subject and Welsh-medium provision in tertiary education. It would also be helpful to be explicit in the explanatory memorandum as to whether Medr's role fits within scope of the Framework or not. These additions will provide clarity of the context in which the Framework will be developed, and how it will be developed.

Evidence

The limited lack of references to Medr and the broad tertiary education sector in both the Bill and its associated documents is problematic in the context of section 28 of the Bill, which sets a requirement for local authorities to prepare a local Welsh in education strategic plan. Given local authority oversight of schools with sixth forms and the requirements in the plan to consider progression to tertiary education, local Welsh in education strategic plans will potentially overlap with Medr's responsibilities.

Proposed amendments

When a local authority prepares a local Welsh in education strategic plan, the Bill should set a requirement in section 28 (4) (b) that the local authority consults Medr and other tertiary education providers, including higher education institutions, not just further education institutions.

The local authority should also be placed under a duty in section 28 of the Bill to take account of any proposals for restructuring sixth-form provision in accordance with the School Standards and Organisation (Wales) Act 2013.

Evidence

The lack of reference to Medr's role in the context of references to tertiary education and how they fit within the proposals for the Institute for Learning Welsh in Part 5 of the Bill creates the potential for ambiguity of responsibilities in the tertiary education sector. This ambiguity is magnified with the absence of definitions for language learning and language learning providers in Part 5.

There will be requirements placed on the Institute (as per sections 39 and 40 of the Bill) in relation to equality of opportunity, continuous improvement, and setting quality frameworks in the context of their oversight of Welsh language learning providers (which are likely to be, or part of, tertiary education providers). This overlaps with Medr's role in relation to equality of opportunity, continuous improvement, and setting quality frameworks in the context of Medr's oversight of tertiary education providers more generally.

Proposed amendments

Define Welsh Language Learning and Welsh Language Learning Providers in Part 5 of the Bill.

Clarify the roles of Medr, the Institute and the Coleg Cymraeg Cenedlaethol (where it is appropriate) in the explanatory memorandum; this would provide helpful context to frame the new statutory duties for the Institute.

Set out an expectation on the Institute to take account of the requirements set by Medr for tertiary education providers when delivering their overlapping duties in sections 39 and 40 of the Bill.

There should also be a duty placed on the Institute to take account of the Learner Engagement Code that Medr will publish for tertiary education providers. This will be in line with the principle that learners are at the heart of the tertiary education system in Wales.

Workforce requirements

We raised workforce requirements in our evidence, recognising that if we want to have more learners who can speak Welsh and learn through the medium of Welsh, there will need to be more people who can deliver education through the medium of Welsh. Ultimately, these reforms can only be delivered by a sufficiently well-resourced workforce across the whole education system in Wales. The tertiary education sector will need to be able respond to the increased demand for Welsh-medium tertiary education, as well as support the skilling and training of the compulsory workforce. In our view, this key dependency is not strongly reflected in the Bill and accompanying documentation. If there is no recognition or clarity on how this will be addressed, either in the Bill or accompanying documents, there is a risk that the ambitions won't be realised. There is also a risk that the burden for delivering the reforms will fall to those within the workforce with the necessary skills, which could have a negative impact on the well-being and retention of those members of the workforce.

At present, however, we are unable to quantify the resources needed to train the tertiary education workforce in the context of the Bill's ambitions. There is some publicly available information that highlights the most recent data around Welsh language skills and the ability of members of the tertiary education workforce to deliver tertiary education through the medium of Welsh:

- [Annual Education Workforce Statistics](#)
- [Welsh Language in Higher Education, 2021/22](#) (section E)
- [Initial Teacher Education Wales, 2021/22](#) (section F)

We recognise that this information is patchy, and retrospective, and herein lies part of the challenge.

Medr is committed to looking at consistency of data across the tertiary education sector, where achievable. In our draft Strategic Plan, due to be submitted to Ministers by 15 December, we have made a commitment to establish baseline data, which will provide a strong evidence base for future planning and decision making. We will also ensure that the workforce is considered in our commitment to deliver on Ministers' strategic ambition that Medr "develops a plan to increase and improve the provision and promotion of Welsh-medium education and assessment in the whole of the tertiary system". This will need to align with the work we deliver to support the broad tertiary education workforce.

We will not be able to deliver these commitments on our own and we will need to work collaboratively with a range of different stakeholders to achieve them. Any plan for Welsh medium in tertiary education will also need to align with the National Framework proposed in the Bill, as well as the different delivery plans that will sit underneath that framework.

Yours sincerely,



Simon Pirotte
Prif Weithredwr | Chief Executive
Medr



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

Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref JH/PO/350/24

Mike Hedges MS
Chair
Legislation, Justice and Constitution Committee
Senedd Cymru

SeneddLJC@senedd.wales

22 November 2024

Dear Mike,

Inter-Institutional Relations Agreement: Forthcoming Intergovernmental Meetings

I am writing in accordance with the Inter-Institutional Relations Agreement to notify you of the establishment of the Four Nations Group on the UK Government Child Poverty Strategy. The purpose of the group is to embed Scotland, Wales and Northern Ireland into the development of a UK-wide strategy on Child Poverty. The group will provide the opportunity for Scotland, Wales and Northern Ireland to inform the development of the UK-wide strategy and ensure the proposed strategy complements existing and developing strategies in Scotland, Wales and Northern Ireland.

I attended the inaugural meeting on the 13th of November. The meeting was chaired by Alison McGovern MP - Minister for Employment and Catherine McKinnell MP – Minister for School Standards. Also in attendance was Shirley-Anne Somerville MSP – Cabinet Secretary for Social Justice, Scottish Government and Emma Little-Pengelly – Deputy First Minister and Junior Minister Aisling Reilly, Northern Ireland Executive.

During this meeting I emphasised the need for collaborative working across government to tackle child poverty. I also sought to ensure that our strategies complement each other and do not duplicate, particularly around areas of reserved and devolved competencies, to highlight approaches here in Wales to tackling child poverty and mitigating the worst impacts of living in poverty and to press Wales priorities particularly in non-devolved areas.

Unfortunately, it was not possible to provide prior notification of this meeting due to it being called at short notice.

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1SN

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

Gohebiaeth.Jane.Hutt@llyw.cymru
Correspondence.Jane.Hutt@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.

This forum is likely to meet on a monthly basis up until the publication of the UK Government Child Poverty Strategy, which is proposed for the Spring of 2025. Unfortunately as meetings are likely to be called at short notice it will not be possible to provide advance notice of the dates of each meeting. I will, however, provide an update following each meeting and will inform you when the group concludes its work.

I am copying this letter to Huw Irranca-Davies MS, Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs; the Children, Young People and Education Committee; and the Equalities and Social Justice Committee.

Yours sincerely,

A handwritten signature in black ink that reads "Jane Hutt". The signature is written in a cursive style with a long horizontal stroke above the first letter "J".

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

Agenda Item 4.6



COLEG
CYMRAEG
CENEDLAETHOL

Coleg Cymraeg Cenedlaethol
Y Llwyfan
College Road
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SA31 3EQ

Chair:

Dr Aled Eirug

Chief Executive:

Dr Ioan Matthews

Tel: 01267 610400

E-mail: gwybodaeth@colegcymraeg.ac.uk

E-mail address: SeneddFinance@Senedd.Wales

27 November 2024

Dear Committee,

Re: Call for information – Welsh Government Draft Budget proposals for 2025–26

Thank you for the opportunity to respond to the consultation on the Welsh Government's Draft Budget for 2025–26.

The Coleg Cymraeg creates and promotes training and study opportunities in the Welsh language by working with further education colleges, schools, universities, apprenticeship providers and employers. We inspire and encourage everyone to use their Welsh language skills, with the aim of creating a bilingual workforce, including the education workforce itself. Our response to the consultation will focus on those elements of the Budget that are relevant to the Coleg's remit.

Welsh-medium and bilingual further education and apprenticeships

In 2018, the Coleg was given the responsibility for further education and apprenticeships, and we are currently implementing ambitious plans to develop provision for *all* learners in these sectors, whatever their Welsh language skills.

As a result of the Co-operation Agreement, the Coleg received additional funding in 2022-23 and 2023-24 to invest in new Welsh-medium and bilingual provision and staff in the further education colleges and apprenticeship providers. Over 60 facilitators were appointed in the colleges in priority areas such as Health and Care and Childcare, and over 20 assessors were funded within the apprenticeship field.

As a result of the increased budget, there has been a clear increase in bilingual learning activities in the post-16 sector since the Coleg was given this responsibility, as seen in the table below:

Learning activities with at least an element in Welsh:

Year	Further education	Work-based learning
2017/18	7.3%	10.3%
2018/19	8.7%	11.9%
2019/20	8.8%	13.0%
2020/21	14.7%	20.8%
2021/22	18.2%	25.3%

Data source: [Cymraeg 2050: A million Welsh speakers – Annual report 2022/23 \(gov.wales p.24\)](#)

Due to the funding challenges faced by the Welsh Government in preparing the 2024-25 budget, the Coleg did not receive the promised increase of £840,000 for the third year of the Co-operation Agreement. Nevertheless, we welcomed the firm [commitment](#) from the Government and Plaid Cymru to re-profile the additional increase to the 2025-26 financial year. **It is critical that the Coleg receives this investment for 2025-26 in order to be able to continue investing, mainly within apprenticeships (work-based learning).**

An inquiry was carried out recently by the Senedd Culture Committee into the Development of post-16 Welsh language provision. Evidence was presented from a number of bodies in the sector stating that, in order to ensure that the provision continues to grow in a sustainable manner, it is vital that Welsh Government funding is maintained and increased over the coming years. We are awaiting the publication of the committee’s report and recommendations.

Funding Welsh-medium and bilingual further education and apprenticeships

The percentage of the Welsh Government's further education budget that is spent on Welsh-medium and bilingual further education and apprenticeships provision is 2%, while Welsh speakers represent 22% of learners. The Coleg Cymraeg and the Government's Welsh-medium and bilingual Further Education and Apprenticeship Action Plan targets *everyone* in the sector, regardless of their Welsh language skills.

Higher education

The Coleg was established in 2011. Since then, extensive Welsh-medium and bilingual provision has been developed across all the main subjects provided at Welsh universities. There are now over 8,660 students studying some of their degree course through the medium of Welsh, which is 27% of all Welsh speakers at universities in Wales.

The Coleg's latest Academic Plan outlines our plans for the next period, and one of the main objectives is to attract new audiences to Welsh-medium and bilingual higher education, including those who are less confident in using their Welsh. There are 19,786 Welsh speakers studying at a university in Wales, equating to 13% of the students at Welsh universities, and the Coleg is developing plans to attract more of them to study part of their course through the medium of Welsh. It is vital that the Coleg receives the anticipated funding to support this important work and to protect the provision that has already been established.

Funding Welsh-medium higher education

The percentage of the Welsh Government's higher education budget (not including the Student Support budget) that is spent on Welsh-medium and bilingual higher education provision is 3%, while Welsh speakers represent 13% of the students at universities in Wales.

Medr and funding Welsh-medium and bilingual tertiary education

In June 2023, the Coleg was designated by the Welsh Ministers to advise Medr (the Commission for Tertiary Education and Research), for the purpose of supporting it to fulfil its duties under section 9(1) of the Tertiary Education and Research (Wales) Act 2022, which relates to promoting tertiary education through the medium of Welsh.

We have presented initial overarching advice on policy, regulation and funding matters to Medr with the aim of informing its first Strategic Plan which will be presented to the Government in December. The advice, and Medr's response to that advice, will be published over the coming weeks.

In its consultation version of the Strategic Plan, Medr has indicated the intention, in accordance with the Strategic Priorities set for it by the Welsh Government and supported in the Coleg's initial advice, to develop a National Plan for the Welsh language in the tertiary education sector. The Coleg welcomes this and looks forward to providing Medr with further advice on the development of the plan.

In order to give effect to the Act's intention to encourage and meet the demand for Welsh-medium and bilingual provision in the tertiary sector, there will need to be a sufficient budget to invest in staff, provision and resources.

Welsh Language and Education Bill

Although the main focus of the Welsh Language and Education Bill is the statutory education system, it will lay foundations for progression to tertiary education and from there into the world of work. It will create the potential to ensure that many more children and young people in Wales are able to develop and use their Welsh language skills, and will ultimately help create the bilingual workforces that are so needed across various fields of employment. We need to start planning now to meet the needs of those who will be leaving the statutory sector and entering the tertiary sector as independent Welsh speakers.

In conclusion

The contribution of tertiary education to the achievement of the objectives of the Government's Cymraeg 2050 strategy and the policy aims of the Welsh Language and Education Bill is clear, but financial investment is needed in order to meet those objectives.

We trust that the contents of this letter will be of benefit to the Senedd's committees as they proceed with the scrutiny of the Welsh Government's draft budget for 2025-26. For more information, please contact Gwenllian Griffiths, the Coleg's Director of Policy, Communications and Engagement, via g.griffiths@colegcymraeg.ac.uk.

Yours sincerely,



Dr Ioan Matthews
Chief Executive

cc. The Senedd Culture, Communications, Welsh Language, Sport, and International Relations Committee (SeneddCulture@Senedd.Wales) and the Children, Young People and Education Committee (SeneddChildren@Senedd.Wales)

Agenda Item 4.7

Platform
Head Office
Beaufort House, Beaufort Road
Swansea
SA6 8JG

olivertownsend@platform.org
platform.org

Dear Members of the Senedd Finance Committee,

Last year, we wrote to you (Platform, 2023) raising our serious concerns about the future sustainability of our sector. Then, we were reaching a point of no return for our services. We know that this was impacting many parts of the public sector as well, but we specifically focused on the realities of the challenges facing the third sector, particularly within housing. We also used that opportunity to describe the work that takes place within housing support services. These services are still, too often, not recognised by our wider society for the huge supporting role they play within people's lives – and on other services more widely. We wanted to demonstrate clearly how fundamental housing is, in its role as a public service.

This year, we remain in a state of concern for the future. It is becoming clearer every year that passes that a state of 'permacrisis' has become the new status quo. There are very significant risks to that, not least the prioritisation of crisis funding, or short-term, in-year savings as opposed to strategic, whole-systems change. Continued prioritisation of crisis spending, whilst understandable, will do nothing to address the needs of people on the edge of crisis, let alone beginning to meet the needs of the 'missing middle' (2018)¹. Indeed, with continued funding pressures, local services' criteria for support become stricter, the level of need much more pronounced, and without a clear shift towards prevention, we are looking at eventual public sector collapse.

Our response this year will attempt to demonstrate the ways in which the third sector is helping reduce demand for key devolved sectors such as housing, the NHS and local authorities, alongside reducing demand for non-devolved sectors such as criminal justice. The reason for this, is that we have a clear opportunity, as a devolved nation, to capitalize on the recent UK budget with £1.7bn of consequential funding coming to Wales.

In our response we have also drawn out the clear impact that financial decisions made in the budget this year will have on key government priorities such as waiting lists. However, we are also clear that focusing on these reductive, simplistic messages does not capture the complexity of the challenges facing Wales today. We need our politicians to be bold and visionary for the future of Wales, and to resist the temptation before an election to focus solely on one area of policy.

¹ Although the term 'missing middle' refers to children and young people, the concept itself can be applied equally to the adult population, who are expected by the system to reach a certain level of need or crisis before 'qualifying' for support.

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The UK Government has ‘front-loaded’ public spending in the recent budget to a “remarkable” extent, according to the Institute for Fiscal Studies (2024). Those spending commitments are expected to level off by the third year, which means that longer-term spending decisions, with the potential to make wide-ranging structural changes over the next five years, must be made now. We understand that there will be a temptation, however well-intentioned, to drastically increase revenue spending on the NHS in response to the challenges on waiting lists. However, we are unequivocal that this would be a strategic mistake.

We are clear that the next Welsh Government budget must allocate capital funding in the most focused and disciplined way that it can. We recognise that there will be significant pressure to deliver economic growth, and at the same time understand the serious challenges facing our NHS and other sectors. In our view, every £1 allocated in spending by Welsh Government in the forthcoming budget must generate maximal value both economically and socially. We explore that idea further below and use the example of how capital spending on social housing could reduce the huge revenue spending pressures of temporary accommodation. However, as well as directly reducing the unsustainable revenue spending by local government on temporary accommodation, good social housing is a key component of creating the right conditions for mental wellbeing. Consistent evidence has demonstrated that addressing the social determinants of our mental health such as poor-quality housing (or lack of housing altogether) can prevent mental health worsening. It is even prevalent within the mental health estate, which we explore further below.

We are also clear that our revenue spending must be equally focused and disciplined. There are many significant challenges facing the third sector (not least of which is the recent National Insurance increase for employers), and more widely public services across Wales. It would be a mistake to consider an increase in funding from the UK Government as an opportunity to return to ‘business as usual’.

We would also want to remind the Committee, that the same crisis in recruitment and retention has not gone away. Last year’s increase to the Housing Support Grant was very welcome. But those same pressures are rearing their heads again, and we hope that the Welsh Government will continue to prioritise that funding stream. It remains a powerful example of government working differently in a devolved nation, and we remain the only UK nation that has maintained an equivalent programme. When we

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compare to England, for example, their Supporting People Programme has long since faded into history. We are lucky in Wales, but it remains a source of strain and concern that this funding needs to be fought for every year. We hope that this can be addressed soon, so that our sector can have the certainty it needs to provide support.

Summary and Recommendations

Our key priorities and recommendations are set out below, as to how Welsh Government can deliver a budget to begin turning around over a decade of under-investment at a Westminster level. Some of the major challenges facing Wales are deeply entrenched at a structural level, and those inbuilt weaknesses require a focus and high level of capital spending to address.

We call on Welsh Government to:**Prioritise spending that makes long-term, preventative decisions, by:**

- 1:** Recognising that the social determinants of our mental health such as availability and quality of housing, good quality employment, connected communities and so on are key factors in reducing mental health needs across Wales.
- 2:** Committing to prioritising public spending that tackles entrenched systemic barriers to addressing the social determinants of mental health.
- 3:** Focusing public spending using a 'maximal effectiveness test' that meets key priorities:
 - a) *Does this spending generate employment opportunities locally or through the supply chain, in Wales?*
 - b) *Does this spending help reduce revenue costs in the short term?*
 - c) *Does this spending help reduce revenue costs in the longer-term?*
 - d) *Does this spending help tackle the social determinants of mental and physical health?*
 - e) *Does this spending help create connected, safe and healthy communities?*
 - f) *Does this spending reduce our carbon / environmental footprint?*
 - g) *Does this meet the ambitions of our Welsh legislation – the Wellbeing of Future Generations (Wales) Act, the Housing (Wales) Act, and the Social Services and Wellbeing (Wales) Act?*

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4: Declaring a National Mission for social housing construction, allocating the majority of capital spending over the remaining Senedd term and beyond for this purpose, to address crippling temporary accommodation costs, and prepare Wales to be the first nation in the UK to offer a universal Right to Housing (Tai Pawb, 2024). **This would help tackle the utterly unsustainable rise in costs to local government that have already increase from £41m per annum in 2020/21, to £99m in 2023/24.** We need the Welsh Government to get meet the £580 - £740m recommended as needed in additional capital investment (Audit Wales, 2024).

5: Allocating capital funding for a community regeneration fund, aimed at our most deprived and disconnected communities with high 'adverse community experiences', using participatory budgeting as the allocation model.

6: Allocating capital funding that addresses the parlous quality of the mental health estate, to ensure inpatient settings can guarantee a physical environment that is safe, healthy and healing.

Address risks to the third sector, by:

7: Committing to a two-year budget deal so that the third sector can have stability and more clarity about the future financial environment.

8: Committing spending to meeting the cost incurred to charities as a result of the National Insurance changes, to ensure that the third sector and local government do not have to shoulder this additional cost.

9: Committing to expedite any funding decisions by ensuring local government pass any increase in funding to commissioned providers rapidly and as close to the settlement as possible.

10: Ensuring that the increases in National Living Wage (NLW) are met in this budget, allowing local government to commission services at minimum, on the NLW rate, and ideally at the Real Living Wage (RLW) rate. Begin working towards setting the RLW as the rate at which all public sector contracts are procured – for whatever contract, including cleaning, maintenance, support, care and more.

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Protect Welsh innovation in Housing Support and explore applying this approach elsewhere, by:

11: Increasing the funding for the Housing Support Grant, recognising the outsize impact (Fury, Lynn Montes and Taylor, 2020) that the grant has on public spending: £1.40 for every £1 spent on average; but also to recognise the huge positive impact on health spending (£4.50 on every £1 spent, for the NHS specifically).

12: Create an equivalent ring-fenced grant (a “Mental Health Waiting List Prevention and Support Grant”) that works on the same preventative basis as the Housing Support Grant, creating the ability for third sector organisations and others to explore preventative ways forward alongside the NHS mental health system.

Prioritise spending that makes long-term, preventative decisions

We cannot waste the opportunities of additional funding from Westminster, and whilst there will be many organisations asking for funding, Wales will not benefit from a sticking-plaster, or ‘patching up’ budget. Instead, it will require focus, alongside an innovative and integrated approach, so that as much capital spending as possible meets as many priorities as possible. We would frame this as a “maximal² effectiveness test” for capital spending. All too often, spending decisions are made purely in terms of growth, with the hope that increase revenue will flow as a result. What this does, however, is reduce the capacity within government to tackle long-standing structural challenges that actively *create revenue costs* for government. On that basis, we have proposed the following questions for government to consider when preparing their budget:

- a) *Does this spending generate employment opportunities locally or through the supply chain, in Wales?*
- b) *Does this spending help reduce revenue costs in the short term?*
- c) *Does this spending help reduce revenue costs in the longer-term?*
- d) *Does this spending help tackle the social determinants of mental and physical health?*

² We use “maximal” here, as it is not possible to fully identify which options could (if any could) achieve a “maximum” effectiveness.

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- e) *Does this spending help create connected, safe and healthy communities?*
- f) *Does this spending reduce our carbon / environmental footprint?*
- g) *Does this meet the ambitions of our Welsh legislation – the Wellbeing of Future Generations (Wales) Act, the Housing (Wales) Act, and the Social Services and Wellbeing (Wales) Act?*

We want this ‘test’ be applied to capital spending commitments in the forthcoming Welsh Government budget.

There are specific areas where we believe capital investment will achieve maximal effectiveness, but it requires the Welsh Government to carefully prioritise their spending. We are making this argument, because one of the most significant challenges facing government finances is the growing revenue spending, particularly for local government. We have argued previously (Platform, 2023) for a “prevention line” to be set up in budgets. This builds on the long-standing and widespread understanding that public spending, to achieve value for money, requires a “parallel system” to run. One that can meet crisis need, whilst not neglecting prevention. In recent years, certainly since 2010, if not before, the funding for preventative activity has been consistently deprioritised in favour of crisis spending. Even ostensibly preventative budgets such as Housing Support Grant are increasingly preventing crises from *worsening*, rather than preventing the crisis itself. Without a change in direction, we do not see a solution emerging, or any stability for people in crisis. We are essentially committed to “crisis maintenance”. It doesn’t have to be this way, and for the first time in over a decade the Welsh Government could take urgent action to tackle this vicious cycle of false logic that our public services find themselves in. Putting it simply: our public services cannot continue to prioritise crisis spending, without making significant strides towards building an effective preventative system.

The additional capital spending available for Welsh Government this year *must* be used in a maximally effective / prudent way, to unlock greater revenue spending in future years. If this opportunity is not grasped now, we will have much more difficult challenges to overcome very soon, especially by 2030.

We have identified several specific areas where significant capital invest would deliver against the “maximal effectiveness test” idea above.

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Example: Temporary accommodation: a widening, deepening money sink that makes people's lives fundamentally worse

Temporary accommodation is not a trauma-informed approach and is actively harmful for people trapped within the housing system (Bevan Foundation, 2024). Whilst there are temporary accommodation providers who work incredibly hard, and whilst many organisations, Platform included, provide tenancy or floating support for people in temporary accommodation which makes a difference, the environment and lack of stability that comes with a placement in temporary accommodation does not create the conditions people need to recover, rebuild and reset. Connection to others, rather than isolation, is what is needed to be well, and temporary accommodation essentially stores up, or worsens, the trauma and chaos of homelessness and entrenches that trauma for the future.

It also comes with a crippling cost to local government, and it looks to be increasing at an alarming rate. Shelter Cymru (2024) figures show temporary accommodation spending of over £41 million in 2020/21. This has risen to over **£99 million** in 2023/24. This rise in costs is unsustainable. It is another growing financial pressure that local authorities are increasingly holding, which curtails their ability to fund preventative services or meet housing needs effectively or safely. Without urgent and significant action on temporary accommodation, these costs will only rise – they are cumulative, as the numbers of people needing temporary accommodation are rising every year.

We need a new National Mission for Wales, targeted relentlessly on building social housing, and we need a Welsh Government that is determined and focused on delivering it, whilst providing the resources to accomplish it.

Our argument is that an urgent investment of a majority of the capital budget into social housing will not only begin reducing the financial impact of temporary accommodation in the medium to longer-term (freeing local authorities up to invest that revenue in other services), but it will also generate employment within the construction industry, and other related industries. It *also* helps to reduce the burden of rent costs on the wider population, helping impact positively on the cost-of-living crisis, and reducing the mental health impacts from poverty and the struggle to live within means. Wales could make very real strides towards making social

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housing a viable tenure for low-to-average income citizens within the next five / ten years.

We also wanted to clarify further, that as well as the costs to local authorities in terms of temporary accommodation payments, there are additional cost implications for the wider housing sector, where traumatising impact of long temporary accommodation stays, which are posing dramatic, and massive challenges for our organisations. Phil Richardson, Platform's Deputy Director of Operations, said:

Without doubt, our Supported Housing teams throughout South Wales have experienced significantly higher levels of dangerous behaviour from the overwhelmed and traumatised people we are housing. Within the six months from April - September 2024, we had surpassed previous annual totals for all previous years in terms of arrears, abandonments, serious anti-social behaviour incidents, physical and sexual assaults and legal proceedings within the Renting Homes Wales parameters. This comes with huge emotional costs to the people we support, especially those where every other option other than eviction has been exhausted. Just as worrying, support is frequently diverted away from other residents to deal with crisis situations, meaning that needs can be harder to meet, causing further distress resulting in connection seeking through often harmful behaviours and a vicious cycle starts to emerge. The pressures also impact emotionally on our staff, who must navigate these difficult situations and who attempt to do so in an ethical, trauma-informed way despite the very real risks on all sides.

There are also significant financial costs not just to social landlords, but also to support providers in terms of drops on income due to bad debt and arrears, but also in terms of the resource needed to deal with the challenge. We must also recognise the costs to local authorities. In addition to the existing temporary accommodation costs, the need for increased support, the potential increase in homelessness due to eviction, all carry significant costs. Again, these are in addition to the figures for temporary accommodation found by Shelter Cymru and represent the continuation of a vicious cycle of spiralling need and costs.

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We believe a significant reason for this massive upturn this year is in part due to the high numbers stuck in temporary accommodation. Often people are going in as what could be termed as having 'low/medium' needs. However, lengthy time spent living alongside trauma, in a space that can be chaotic, with no sense of physical security or psychological safety, is only going to lead to one outcome: further distress. When eventually people can be moved into Supported Accommodation, the trauma and experiences they have accumulated result in higher levels of distress and often a complex web of coping mechanisms they have adopted to cope with this.

This has a further impact on the ability of services to offer tailored, personalised services. Again, we fully understand and have huge empathy for local government and their critical need to house people, but the pressure on social housing allocation means providers cannot exercise any influence over the mix of needs people have within a project. To provide excellent support, there needs to be a mix of needs, to minimise the presence of chaos or disruption. It is not possible, on the staff structures afforded through funding at present, to meet the needs of all residents in supported housing, if the combination of needs is not considered. For example, we would usually try to minimise the occurrences of someone using substances to cope with trauma, being housed with someone who is on a long-term recovery journey but who is vulnerable to going back to that as a response. As providers, our staff understand the needs of people very well, and their ability to influence or guide placements into supported accommodation has been severely curtailed by necessity.

This also goes hand in hand with needing sometimes to support people who we do not have the agency or power to appropriately support, often with limited support from statutory services who would previously have intervened (for example, see recent changes to policing around Right Care, Right Person). We are seeing sectors we interface with on a regular basis in states of overwhelm, unable to provide the help and support previously offered to the people we support.

To put it simply: temporary accommodation is becoming a harmful, chaotic, traumatising, dangerous place for people to

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live, and is creating a pipeline of trauma. Rather than being a safe space for people to wait for housing, in small numbers, it is increasingly becoming a source of serious harm to people both mentally and physically. It will become known as one of the greatest policy failures in the 21st Century, in terms of human and financial cost, if urgent action is not taken to resolve it.”

There are, of course, other areas where capital investment would be helpful. There will be arguments for transport improvement, road building, and other worthwhile capital investments. Our argument is based on clear evidence both as to the longer-term costs of trying to invest everywhere all at once. There is no other capital investment opportunity that we can identify, that meets the “maximal effectiveness test”, as well or as fully as the construction of social housing. Ultimately, it is the *guaranteed* positive impact of reducing temporary accommodation costs for local authorities, that has led us to recommend so strongly, that most of the available additional capital spend be allocated to social housing³.

We are aware that this is a difficult ask, and that is why we have made the logic abundantly clear. This budget should be seen as a “spend to save” budget. We are aware that it will mean Welsh Government disappointing other stakeholders. We are aware that there will be a temptation to allocate varying amounts of capital spend across different departments, or even to allocate proportions of that to revenue spend. We cannot emphasise strongly enough that the ability to develop and expand the volume of social housing within Wales is one of the most impactful policy levers available to us through our devolution settlement (Welsh Parliament, Local Government and Housing Committee, 2024), realising significant economic and social benefits and we desperately need a government that prioritises housing.

Supporting regeneration led by communities themselves

If the need to build more social housing is our absolute priority for capital spending, our second priority for capital spending would be supporting regeneration of communities – by giving them the power (and funding) to decide what their communities need and having the resources to build

³ We mean social housing with affordable rents, rather than affordable housing supply for homebuyers.

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that. We have made clear already, and in our submissions to Welsh Government on their mental health strategy (Platform, 2024), the importance of addressing the social determinants of mental health. Our communities must be places where people can thrive, connect and find safety, and after the restoration of Welsh social housing supply, community regeneration is one of the areas for investment that would have a positive impact on our mental health. We need to create ways for communities to work together, with the right support and funding, to tackle the social determinants that are holding them back in their specific areas. We advocate strongly for participatory budgeting in this approach, restoring power to communities and ensuring they can make decisions for themselves. Having a fund that is clearly community-led in all ways, will also help restore a sense of agency and hope to parts of Wales that feel forgotten about or unheard. We would encourage Welsh Government to ensure there is a revenue aspect of community funding too, to ensure that those communities that face the most barriers to their physical and mental health have the resources they need to address the challenges in their local areas.

Transforming the mental health estate

Whilst we believe that investing in social housing, and then our communities, need to be the two priorities for capital investment, our third priority would be for investment in a highly outdated mental health estate. We explore further below, how we believe an overdue shift in our mental health approach can provide better outcomes for people – but it is also clear that the current mental health estate is not sustainable, nor does it promote a sense of safety that allows people to heal and recover. The *Raising the Standard* report from Mind Cymru (2024), references the challenges raised to the physical environment in an inpatient setting from Health Inspectorate Wales inspections in five out of eight hospitals, including missing environmental audits, and environmental ligature risks. Recent inspections identified baths and toilets not working, cracked windowpanes, redecorating not happening when it is needed, and a lack of evidence that ligature risk assessments have been followed-up.

We believe that a capital investment in the quality and safety of our physical inpatient settings is critical if we are to begin creating safe, healing spaces for people in distress, rather than retraumatising them, creating further need for care. Whilst we understand that the Welsh

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Government has begun work in this area, we would want to see this work prioritised when reviewing the wider NHS estate in Wales, and we would support Mind Cymru's call for "a review into the mental health estate, and to consider where improvements can be made in line with recommendations from Health Inspectorate Wales and feedback from patients".

We cannot overstate the challenges of this environment. In England, mental health staff are currently on trial for corporate manslaughter (Independent, 2024) because of poor physical environments and the impact on patients. This is the first time a trust is facing corporate manslaughter charges over the death of a mental health patient, but there have been several successful prosecutions brought by regulators, the Care Quality Commission and Health and Safety Executive over mental health patient deaths. We know NHS Wales mental health settings have similar issues, and coroner's reports across health boards have found deaths related to ward safety and other factors (BBC Wales, 2023; BBC Wales, 2024; BBC Wales, 2024; BBC Wales, 2024).

A report (BBC Wales, 2024) by the Royal College of Psychiatrists found less than half of 84 recommended improvements to a hospital trust's mental health department have been made. In the past ten years, four separate reviews have outlined changes to be implemented by Betsi Cadwaladr University Health Board. Patient watchdog, Llais, said people had continued to die during this time.

These issues are prevalent across health boards and directorate and there are similar incidents reported across older adult, learning disability, adult mental health and the children's mental health specialities.

NHS Wales is carrying the same level of risk therefore, as the NHS in England, and without urgent action this is a crisis that will continue to escalate as it unfolds. We also explore further below on this note, how alternatives to mental health inpatient settings are being piloted across Wales, and how these changes will help address this historic underfunding in the mental health estate, chronic under resourcing and poor-quality care provision using a restrictive mental health model.

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Address risks to the third sector

Tackling the National Insurance rises, and the increase in National Living Wage

We have written as part of the Wales Alliance for Mental Health, to the First Minister, in partnership with Cymorth Cymru, and DASU, asking for an urgent representation to be made to the UK Government by the Finance Secretary for the Welsh Government. The impact of the increase in National Insurance will be significant, with organisations we have spoken to reporting additional costs in the hundreds of thousands. That, in conjunction with the increase in National Living Wage (which we welcome), creates another wave of costs for the third sector to address. At Platform, we have made public that the National Insurance increase alone will increase our costs by around £250,000 a year.

We are concerned that the same exemption that applies to the public sector, does not apply to the third sector. Whilst smaller businesses and charities are exempt, increasingly the Welsh public service delivery environment has shifted – more and more local government contracts are being delivered by the third sector, without the same workforce protections, and at cheaper rates. We are working to meet statutory duties held by local government, but without the same exemption in National Insurance.

At the first stage, we hope that the Cabinet Secretary for Finance, and the First Minister, as well as others within the Welsh Labour Party, will be arguing on our behalf with the Westminster Government to see immediate action on this. Otherwise, we know that any potential increase in funding for social care, homelessness, or other areas that are in desperate need for funding, will see that increase lost immediately on managing the new costs of NI and the National Living Wage. We have seen yesterday (26th November 2024) that the Chancellor has ruled this out, and that the exemption will not be applied. We are deeply disappointed with this response, and we hope that the Welsh Government will use the opportunities that are available to Wales by having the same political party in Cardiff Bay and Westminster making the decisions, to call for this to be rethought.

However, given the Chancellor's response, we do not, sadly, believe this to be possible. On that basis therefore, we must see corresponding increases in funding for the third sector, to ensure that the additional costs

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can be met without causing charities to lose staff, or close services. This would then have a knock-on effect for the NHS, with increased demand and longer waiting lists.

Longer-term, we hope to see with a renewed partnership between Westminster and Cardiff Bay, progress on two/three-year budget settlements, providing the third sector (and our local government commissioners) the certainty and stability we need to plan delivery and remain sustainable. We hope that this budget provides an opportunity to set a two-year budget, avoiding the uncertainty that would be caused by a pre-election budget.

We also set out below that it can still take local government a long time to decide on any uplift given to providers, even after a Welsh Government budget with clear and firm guidance given by the relevant Minister. We would want to see this addressed in this budget and future budgets: the time taken for the process to conclude has meant in some cases, uplift decisions only being made by the end of July, over six months after the budget was published. This continued delay, a long-standing feature of government, places the associated risks firmly on providers, as we wait for confirmation sometimes for months, and creates huge uncertainty amongst senior management and that has a knock-on effect for our frontline staff. We would want to see funding decisions made by Welsh Government expedited, with an expectation that local government moves as quickly as possible to pass uplifts on to providers. Every delay only furthers the sense of uncertainty that the third sector continues to grapple with, financially. Many of our challenges around staff retention, morale, clarity, pay and progression, would be lessened with faster decisions that are more clearly and rapidly communicated.

Protect Welsh innovation in housing support and explore applying this approach elsewhere

Again, as with the capital investment that is available to the Welsh Government in this budget, there is a need to be extremely focused on what will bring the best results for Welsh public services over the remainder of the Senedd term and into the next. Our response last year (Platform, 2024) made clear the impact that the cost-of-living was having both on the people we support, but also our own highly valued colleagues. We also drew attention to the work that housing support workers do, often unseen, across Wales.

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The increase in the Housing Support Grant last year (an initial rise supplemented by additional funds from within the Housing Department of Welsh Government) went some way to reducing that pressure, and we were grateful that this need was heard, and acted on by Welsh Government. However, whilst we understand the significant challenges that local authorities are facing (as we raise above with our hope that capital investment will focus on social housing as a national project), we also do have to raise our concern that the uplift was not passed down to housing support organisations at the same level, in all cases. The pressure was eased, but as a sector, housing and homelessness charities collectively felt that it was a crisis only just averted, rather than addressed, essentially another example of “crisis maintenance”, as we described above. We hope that the Welsh Government will note this for any funding decisions for their 2025-26 budget, and act urgently to expedite any decisions, and ensure as much as possible actively reaches the front-line for services.

One of the aspects of the Housing Support Grant that we are proudest of, is the ability to innovate, and work in a preventative way. This is something that austerity made much harder. Whilst there was a belief that we could innovate our way to lower-cost solutions, it has been clear to us within the housing and support sectors, that austerity has made that harder. By continuing to support the sector through this Grant, the Welsh Government has allowed the housing sector some space to innovate and explore creative solutions to housing crisis, such as assertive outreach, Housing First, and others. We would want to see this funding continued, increased and protected, and this approach adopted within mental health services.

Making the case for housing support and wider homelessness services in meeting the needs of a struggling NHS

We recognise that the Welsh Government’s key priority, as stated by the First Minister on several occasions (Independent, 2024), is to reduce waiting times for the NHS. Multiple research reports demonstrate that addressing homelessness can make significant savings for the health service (Pleace and Culhane, 2016, and Pleace and Bretherton, 2019). A widely cited, but no less impactful, Cardiff Metropolitan University evaluation (Fury, Lynn Montes and Taylor, 2020) of the then-Supporting

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People Programme, and now Housing Support Grant, demonstrated significant savings of £1.40 for every £1 spent. However, it is also important to flag that the same report identified a saving of £4.50 specifically for the NHS, for every £1 spent, when the specific areas of impact are identified (page 68).

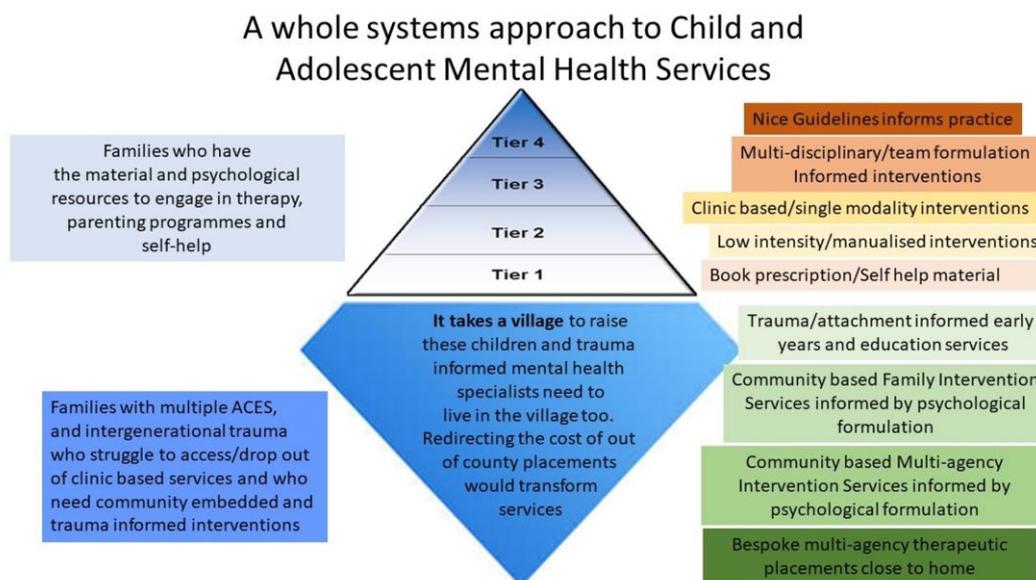
We want to make clear to the Welsh Government as they pull together their budget, that the Housing Support Grant, and other related areas of spend, have an outsized impact on the health service. In this way, it is very similar to the impact that social care support has on patient stay in NHS beds – often unseen by the public, but without it, the system would very quickly begin to fall apart.

We would hope that the Welsh Government can prioritise the Housing Support Grant for above-inflation increases in funding, so that local authorities can continue to allocate services for people on the edges of our society, who are homeless or at risk of homelessness. If this was to happen in conjunction with a large-scale, historic investment in social housing, the Welsh Government could realistically become the first nation in the UK to drastically reduce homelessness in recent years – and that would be a record to be highly proud of.

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Supporting the development of safe, therapeutic, calm environments that are an alternative to mental health inpatient wards or attendance at A&E.

Moving from Tiered Support to a Community for Mental health approach



Our current model is based on a one-at-a-time, individualised clinic approach which attracts long-wating lists, where delivery is slow, with high financial cost, low sustainability, poor outcomes, and devoid of context and relationships.

The limitations of the one-at-a-time, clinic-based, purely medically focused model have been documented clearly in the Mind over Matter report (National Assembly for Wales, 2018 and by the WHO and UN respectively (WHO/UN, 2023). It is hard to access and by default our most vulnerable families and adults are missed. It is a one size fits all that cannot accommodate bespoke need or cultural sensitivities.

It is not a prudent use of resource to send people back to the circumstances that made them unwell in the first place without making any change to those circumstances. The recent *Connecting the Dots*

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report (Welsh Parliament, Health and Social Care Committee, 2022) made clear the links between circumstances and people's mental health here in Wales. This not only means we must address the social determinants of mental health but that we must focus on interventions that can also restore healthy attachment across our communities, at the level of the family, our 'blocks', and the community more broadly.

To shift towards a more therapeutic mental health approach that is embedded more in our communities than within systems, our mental health system needs to be able to explore and innovate. We have been working to do that as an organisation, whether by supporting other organisations in their pilots, or through piloting our own approaches. These ways of working, which are more focused on preventing harm, avoiding interaction with inpatient care, and bringing support into the communities where people live, offer very real hope for a way forward. Critically, these interventions are cheaper than inpatient care and carry significantly fewer negative impacts for people.

We explore these options, and some of the history, context and impact of them, below.

Open Access Mental health Care: Crisis Houses

Platform has been delivering the only two 'Crisis Houses' in Wales since 2005/6. Crisis houses are an alternative to inpatient wards or A&E, providing support by trained support workers, in a more informal setting, that people can feel safe in.

Crisis houses are part of a world-wide move towards community-based care for people in acute mental health distress and more generally as a mode of care and support across the spectrum of need. This model is endorsed by the World Health Organisation and commonly referred to as the 'Trieste model' after the town in Italy it first emerged from. Alongside this emerged the Finnish 'Open Dialogue' approach which is a model of mental health care that involves a consistent family and social network approach where all healthcare staff receive training in family therapy and related psychological skills. All treatment is carried out via whole system/network meetings which always include the patient. This model is being piloted with in Cardiff and the Vale UHB Adult Mental Health services with great success alongside other transformational work as

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described here⁴ by Dr Andrew Vigen, Assistant Clinical Director for Mental Health. These ideas support the move towards a co-produced and more democratic mental health system in Wales. Crisis houses are the UK's early emergence of these ideas in practice.

The ultimate aim is to move away from entangling people in NHS hospital services which are costly in resources, have poor treatment outcomes, and also can further enforce a medicalised viewpoint of mental health onto the individual. We also see from Mind Cymru's report (Mind Cymru, 2024), a consistent concern about the quality-of-care within inpatient settings, and patient experiences are not positive within these settings.

These include concerns about "coercion by staff, fear of assault from other patients, lack of therapeutic opportunities and limited support" (Staniszewska et al, 2019), the lack of activities to prevent boredom (and associated risk of self-harm incidences, for example), particularly on weekends (Foye et al, 2020), and others. Sky News in partnership with the Independent recently created a podcast⁵, about the story of a young mother and former GB youth swimmer, Alexis Quinn, who agreed to enter NHS England psychiatric care following a family tragedy. In her words, her three-day admission turned into a three-year ordeal.

Harm is exacerbated further by a lack of agency, overuse of force and restrictive practice ranging from not being allowed to take entitled S17 leave for arbitrary reasons to not being allowed in their bedrooms during the day, or only allowed patients access to decaffeinated tea and coffee. The environment is also one where "established principles of inpatient care, such as dignity and respect, collaboration and promoting patient autonomy, tend to be implemented to only a limited extent" (Eldal, 2019). The evidence for positive impact of mental health inpatient settings is dubious, to say the least. The recent WHO/UN Guidance on mental health legislation and practice (WHO/UN, 2023) raises significant concerns with the use of restraint and calls for a shift in approach towards one that is rights-based, person-centred, least-restrictive and with informed choice and consent. The reality is far from that, presently.

Last year, we supported 211 people through our two crisis houses. 84% of those avoided inpatient hospitalisation which is a huge achievement, and

⁴ <https://www.youtube.com/watch?v=DBCsf5T9EtM>

⁵ <https://news.sky.com/story/patient-11-podcast-13054441>

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in line with other evaluated crisis houses internationally (see below). The feedback from our crisis house residents is incredibly powerful.

“Helped me keep going through the darkest hours and has allowed me to see my way through the storm.”

“I will never forget your kindness.”

“I now know that I can have a place to go if it's my last resort, and not be taken away from my children.”

“I'm not naïve enough to think I can be 'fixed', but I honestly feel it's made me whole again.”

Beginning around the early 90s the 'crisis house' approach (Hartmann and Sullivan, 1996) clearly demonstrated the positive implications of the model. Only 20% of respondents reported a hospital admission since their discharge, with 61% believing they would absolutely have gone to hospital if this option hadn't been offered. This evaluation did suggest that people with repeated histories of hospitalisation had fewer positive outcomes, which is a further indication of the traumatising impact those settings can have.

A research review into the contributions of the third sector to mental health (Newbigging et al, 2020) summarised the crisis house approach impact as being more “homely”, and offering a “less fraught, with less coercion and loss of liberty” than traditional mental health inpatient responses. The review cites Sweeney et al (2014) who found that the “therapeutic alliance” (the relationship between mental health professional and 'patient') was stronger and more positive in crisis house settings than on inpatient wards. They cite Butt and colleagues (2019) finding that there were “improvements in mental health and safety”, and Croft and Isvan (2019) finding that short periods of stay in respite care reduced inpatient and emergency admissions “up to 9-10 days for each day of stay”.

There are mixed understandings of the severity of need experienced by residents of crisis houses, with some (Johnson et al, 2018, cited in Newbigging et al, 2020) positioning crisis houses as a “softer” alternative that are less appropriate for people with “more serious” mental health issues. This is disputed itself by a randomised control trial, cited in

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Greenfield et al (2008) where comparing a managed crisis residential programme (CRP) with four beds, to a locked inpatient ward with 80 beds, “found a greater severity of ‘illness’ and lower functioning scores for people in the CRP”. At Platform, we have experienced, despite a highly positive relationship with Cardiff and Vale Health Board and Aneurin Bevan Health Board (the two commissioners for the Crisis Houses), a focus on medium-level mental health issues for referrals to the crisis houses we run, when we would also like to explore holding more (perceived) complex people safely.

This is a critical point: organisations like Platform (and others) currently deliver supported accommodation and floating support across the housing sector, working with people regularly in high levels of distress. Our public sector trusts organisations like Platform to hold people safe in these moments, sometimes for months or years at a time, but that same confidence is not yet held within the mental health system. One of the areas we believe needs to be explored, urgently, is how to create more crisis houses and other community-based care and support in Wales, and to create the right conditions in partnership with health boards, so that more ‘severe’ mental health issues can be accommodated within a crisis house approach. Anything that reduces the human and financial impact on people and the system, at the level we know the crisis house does, should be explored actively and urgently.

We know it saves money. Whilst this area does require further exploration, early indications (again, Newbigging et al, 2020) are that there are significant financial savings to be made: Fenton et al (2002) found that crisis houses provide similar outcomes to inpatient care, at a significantly reduced cost; Bagley (2012) identified a £5.17 benefit per £1 invested; and Croft and Isvan (2015) found a decreased use of inpatient and/or emergency services, albeit for a time-limited period. At a time where A&E pressures, ambulance waiting times, and overall waiting lists for elective surgeries are causing significant challenges to the Welsh Government and the NHS health boards across Wales, we believe it is a matter of urgency that these evidenced alternatives to inpatient admission are explored. The fact that there are only two of these in Wales, despite the powerful emergent evidence dating back almost three decades, should raise questions about the ability of our public policy system to embrace much-needed innovation despite the strong support we have received from our health board commissioners.

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Open Access Mental health Care: Sanctuary approach

Additionally, Platform has recently developed, in partnership with Cardiff and Vale University Health Board, a 'sanctuary' approach, which was itself inspired by our Hangout, for young people commissioned by the same health board. These two physical locations offer a safe, healing, and therapeutic space for people in distress. In the case of the adult Sanctuary, it can be accessed after calling 111 press 2, in Cardiff and Vale. Our Sanctuary in Cardiff has already supported over 200 people this year, who would otherwise have

Sanctuary models are, in a similar way to crisis houses, an alternative to emergency inpatient or A&E admissions, or ambulance call-outs – but rather than residential short-stay, this is a temporary visit during the evening when other services are not available, which help reduce demand on emergency services. Again, this approach saves significant resources and cost to the NHS in Wales, and we would encourage other health boards to explore how more of these spaces can be commissioned across Wales. Sanctuary approaches are different to The Sanctuary Model™, which refers to an organisation-wide trauma-informed approach pioneered by Bloom in the 1980s, and aspects of which have informed the development of Trauma Informed Wales and the accompanying Trauma Informed Wales Framework.

Continued



A photo of our newly launched Sanctuary service – a welcoming, warm, therapeutic space for people experiencing mental health crisis. Imagine the difference between arriving here (we have a fundraised fund for taxi travel in an emergency) at your own pace rather than at a ward, having been escorted by police, or picked up in an ambulance with loud noises and flashing lights. A very different (and less costly!) mental health system is entirely possible.

One person who has accessed our Sanctuary in Cardiff, Geoff, said:

“Everyone has been extremely compassionate, patient, and understanding which has made me feel less alone, ashamed and isolated.

just had a long and difficult conversation with my mother about the lack of compassion and support I've had from both my parents since I got back here and although she was very combative, invalidating and demeaning, my talk with you tonight helped me maintain a calm, composed, patient demeanour through the whole conversation, avoiding all her attempts to antagonize and trigger me into losing my dignity and project her shame onto me.

I wouldn't have been able to achieve that if it hadn't been for the genuine unwavering concern and interest, you showed me

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and the challenges I'm dealing with. After the conversation was over I concluded that I need to achieve independence, move out and eventually go no contact with them as the damage they've done is irreparable. I didn't have any motivation to get myself together, and now I do. It will be unbelievably difficult but if I stay here with them things will just keep getting darker and darker for me.

I just wanted you to know that you've made a big difference in my life."

Open Access Mental health Care: Cardiff and Vale Hangout approach

On a similar approach to the Sanctuary scheme in Cardiff, is the Hangout approach, specifically aimed at young people. The experiences of young people in the mental health system is no less traumatising than it is for adults, and arguably given the particular lack of agency and power often afforded to young people, the impact can be much more significant.

When young people face challenges with their mental health, it can be difficult for them to get the help they need, when they need it. Specialist services have historically had waiting lists to access assessment and intervention – unfortunately leading to the mental health of some individuals deteriorating as they wait to access support. The COVID-19 pandemic has only exacerbated this challenge.

The earlier an individual can access the help they need, the more effective it tends to be in preventing problems from getting worse and potentially leading to a mental health crisis.

The development of local, easy to access early support mental health hubs has proven to be an effective way of providing children and young people with support when they need it. This is backed up by young people in the region (Cardiff and Vale) telling us that this is what they need: support when they need it, in a relaxed and non-medicalising / stigmatising place.

Since opening our Hangout in Cardiff, over 500 young people have visited, and the response from them and parents/guardians has been overwhelmingly positive.

The feedback has been so powerful:

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"I used to feel very anxious all of the time but this has changed since coming to the Hangout and since then I feel much more calm." – (young person aged 11-13)

"I can see that the 1:1's have helped a lot – when I pick her up from the Hangout, there is always a noticeable difference from when I drop her off. She seems much more calm once she has been." – (parent of a young person)

"Thank you for yesterday. [YP} absolutely loved it and is looking forward to coming again! This is big news as he has rarely left the house over the last year. You have a great service there, thank you for being so welcoming." – (Professional working with a young person)

"She has been referred to CAMHS multiple times and rejected because she has ASD. The Hangout was the only thing we found that was appropriate and accepting. She found solace in The Hangout and was going daily for awhile over the summer. We attribute her healing 99% to The Hangout. It's been an absolute lifeline, especially as she moves away from sharing everything with us and needed another safe outlet. It was the staff and the art that kept her coming back." (Parent of a young person)

Cardiff and Vale University Health Board have invested additional Welsh Government funding to open a second Hangout in Barry, although due to the limited nature of funding they were only able to commit to one year. This is an example of a supportive commissioning relationship that is still prevented from being as innovative as it can be, because of the consistent challenge of longer-term funding and how that interacts with capital investment and risk. For example, in order to secure a welcoming, therapeutic environment that this model is entirely dependent on, a significant capital investment was required from Platform and CAVUHB, and both organisations have taken a risk in investing, hoping that additional funding can be found to extend this contract. If the contract is not extended (and it only can be if CAVUHB have the resources to do so), then both partners will have taken a financial hit from the capital investment.

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One of the rooms in the Barry Hangout, which provides a safe, quiet and therapeutic space for young people in crisis. Again, a very different prospect to traditional emergency service responses.

Clinic to Community: Whole Public Sector Support

Increasingly, Platform is also seeking to develop and invest in a way of working that brings clinic-based skills alongside communities. Whilst this has been tried before for primary mental health with group sessions on managing stress, for example, what has not been tried on a significant level is providing people high-level psychological support, and framing, within community settings (also known as the open dialogue approach in adult mental health) and crucially, community settings that *make sense to the people who live there*.

That means working closely across public sector and community teams, to establish where communities of place and trust exist, and ensuring that mental health services and responses can situate themselves there. It also means supporting psychologists from the Welsh NHS in building community approaches.

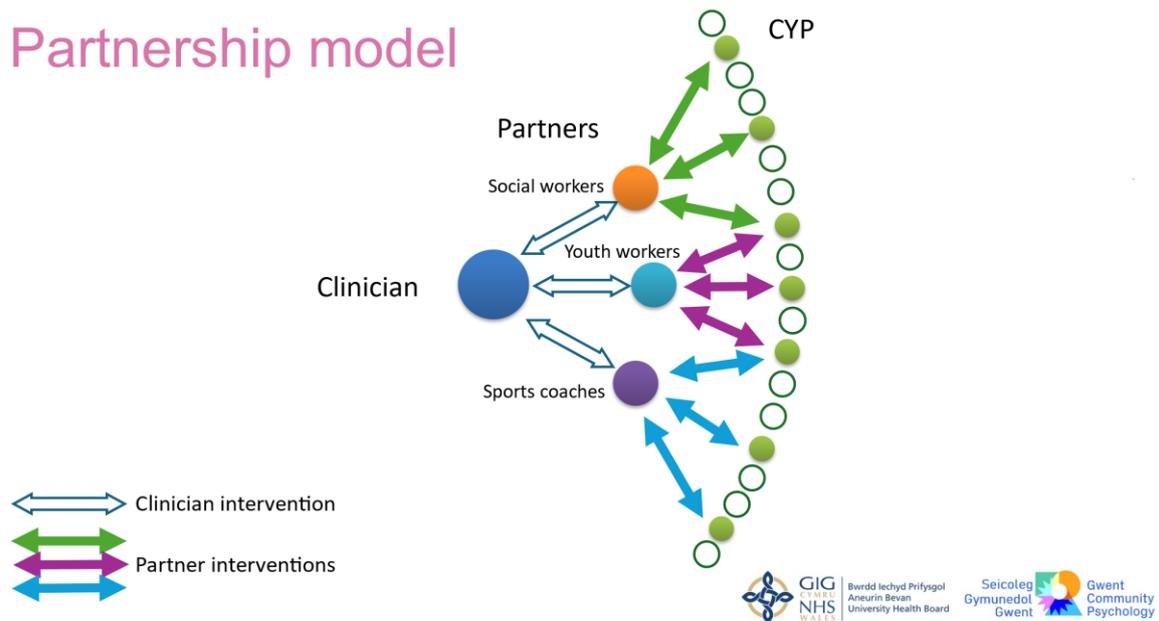
For example, many of the community groups are held in buildings that are owned by the NHS, or that can be hired out, and still often require travel for people. They are chosen, largely, out of budget necessity, rather than

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through consideration of which communities can be reached more easily. This means that in communities that are more distant, or who have been consistently let down by services, there is further disenfranchisement and entrenched inequality.

Aneurin Bevan Health Board have explored ways in which a clinic to community approach can be adopted, and they have considered not just how to bring psychological knowledge and expertise to people who need it, but to *professionals* that interact with them more often.

Partnership model



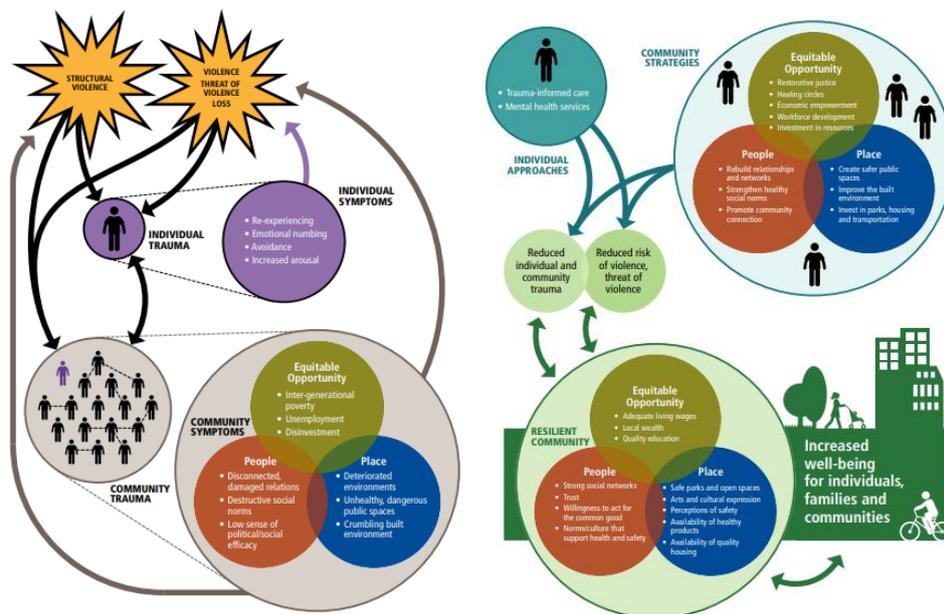
The diagram above demonstrates their community psychology approach clearly. With traditional clinic-based psychology, a psychologist can see one person at a time. This is a costly, and not hugely effective, intervention. However, if community psychologists can support wider networks of professionals to work in a more psychologically informed way, offering advice, reflective practice, and sometimes step in more actively when needed, the impact of community psychology can become significant indeed.

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Clinic to Community: Whole Community Support and Targeted Trauma Informed Community Development

Working directly with communities themselves, as well as professionals, is also one method of bringing clinic to community. In this, Platform has piloted different approaches, beginning with a partnership with Save the Children, our Bettws Early Learning Community. Here, Platform worked with a group of parents to develop their psychological knowledge and help them with skills to regulate distress, all in group sessions supported by psychology.

The impacts of this are still being felt positively, and we know it has prevented wider impacts of emotional distress in that community. Our evidence to the Finance Committee is clear: if we can invest, as a country, in sensible, evidence-based yet innovative community-based interventions, we could start to reverse the financial burdens on our system. However, we can only do that if the Welsh Government is willing to take the risks politically, to invest significantly in prevention budgets and in capital investments.



Addressing Adverse Community Experiences Framework (Pinderhughes et al, 2015)

Continued

Taking these approaches forward

Given the high costs of mental health inpatient wards (both financial and in terms of impact on people needing support), which underscores the need to move to community integrated care, we must explore these, and other options that prioritise support and treatment in community settings. We would encourage the Welsh Government to allocate funding to health boards to develop pilots for these options, with an idea of creating a grant dedicated to exploring preventative activity within the mental health system, along a similar model to the Housing Support Grant. We have suggested this be called a “Mental Health Waiting List Prevention and Support Grant”, which health boards could use to commission community-based preventative services like Crisis Houses, Sanctuary models, clinic-to-community approaches, or GP cluster models. We understand that Welsh Government have made different pieces of funding available, for example, the funds that have allowed Cardiff and Vale University Health Board to open the Hangout in Cardiff and then to commit to a second venue in Barry. But these are still relatively rare exceptions to the mainstream system responses. Without the support to pilot, at scale, these innovative ways of working, the mental health system will remain stuck in managing crises, trapped by the legacy of a Victorian approach to mental health which is holding us back from offering the compassionate approach we know we need to adopt: and critically, that we know are cheaper, more effective and result in better outcomes for people experiencing distress.

Conclusion

There is a real opportunity with this budget. The capital investment potential to make long-term, long-lasting positive impacts on local government revenue costs is a real opportunity to grasp a generational crisis affecting our citizens and our public services at all levels, and for future years. So too, is the opportunity to shore up the Housing Support Grant, which is an ever-important preventative funding stream, without which we would be experiencing significantly higher demand.

We recognise that the Welsh Government has multiple and serious challenges facing it. There will be a temptation to stick to what has been done before, with the security that this certainty provides. We know there are not enough resources and sectors across Wales are all overloaded

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with work. That is without even considering the hurt and harm caused with the history of austerity and those impacts of policy.

Owning our story can be hard but not nearly as difficult as spending our lives running from it. Blame is the discharge of pain. It is the inverse of accountability. It will be easy to get stuck blaming Westminster, both historically and even today. But if we simply get lost in that, we will miss the opportunity to take charge and change what is within our gift. Embracing our vulnerabilities is risky but not nearly as dangerous as giving up on love, hope and belonging.

We understand that the budget cannot make everyone happy and in fact, we expect that and have explicitly argued for that in our submission. Whilst there must be an awareness of complexity, and there will need to be compromise, if the Welsh Government tries to keep everyone happy, it will not succeed in making the long-term choices that are needed, to address deeply embedded, structural inequalities that are having a terrible impact on our society's health, wellbeing and crucially our hope. In 2010, when austerity was first proposed, the then Chancellor argued that reducing the deficit was a national mission, but it seemed to be a national mission that resulted in few positives for the people of Wales, despite their hard-won sacrifices.

In December 2024, we would love to hear the Cabinet Secretary for Finance announce that there is a new National Mission for Wales: that there must be a relentless focus on spending to save, in ways that benefit wider society, and reduce costs that are currently making it impossible for local government to meet everyone's needs in the ways we all deserve. This sense that our public services cannot meet needs is pervasive, so anything that reduces costs for local government, increasing the potential to do more locally, will benefit everyone, and crucially, will be noticed by citizens across Wales.

We would welcome the Cabinet Secretary being clear with voters, that this approach might mean that some sectors that expect to get resources may have to wait a little longer, but that the relentless focus of the Welsh Government will be on housing (to reduce costs and provide hope), on prevention to save our NHS (by reducing costs associated with outdated mental health interventions that inadvertently cause harm and create further costs in the long-term), and on providing space to innovate new ways forward for our mental health by connecting us as communities that can thrive in the 21st Century.

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We have a chance to make a generational change. Against the backdrop of the hopelessness we have become so accustomed to in recent years, this year's budget provides the Welsh Government with a genuine choice for the first time in over a decade. The decisions made for Wales in this budget will set the direction of our nation in years to come. The old proverb comes to mind: "Blessed is he who plants trees under whose shade he will never sit." We hope that the Welsh Government will sow those seeds in the budget, knowing that future generations growing up in stable housing, with supportive, compassionate communities and public services that are responsive, offer dignity, and impose themselves lightly, will thank those that had the foresight and courage to invest when they did.

Stronger together. Healthier together. Heal together.

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Agenda Item 4.8



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 analysis¹ 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.² 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?

¹ [ColegauCymru warns of devastating impact of apprenticeship funding cuts](#)

² <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 research³ 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.

³ [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 tradespeople⁴. 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

⁴ [UK to lose out on £98bn of growth by 2030 due to shortage of tradespeople \(kingfisher.com\)](#)

as being the number one barrier to getting a new course, training or a job⁵. 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?

⁵ [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 economy⁶, 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)⁷ 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 income⁸. 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

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

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

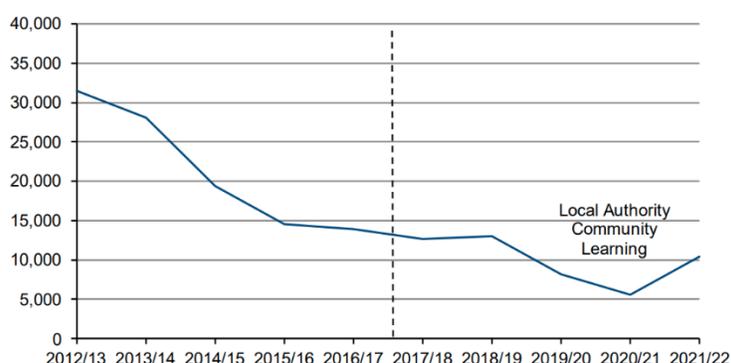
⁸ [Education: a neglected social determinant of health - The Lancet Public Health](#)

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 slashed⁹. Since then, as recognised by Audit Wales, part time students have been particularly affected by the pandemic – especially those in adult community learning¹⁰. 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”¹¹.

The long term decreased trend in adult learning can be linked to reductions in public funding¹². 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 lives¹³.

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?

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

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

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

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

¹³ [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 report¹⁴.

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

¹⁴ [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.¹⁵

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

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.¹⁶

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.

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

¹⁶ <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

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Agenda Item 4.9



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27 November 2024

Dear Chair,

We are writing to ask your Committee to review the Government's LGBTQ+ Action Plan in the light of policy and research developments since it was finally published in early 2023.

Lesbian, Gay and Bisexual Alliance Cymru (LGBAC) is a grassroots campaign group with members across Wales. Since 2020, we have been proud to represent the interests of people who are same-sex attracted, putting their views to policy makers and legislators while rebuilding our communities. We have criticised the Welsh Government approach to services for our communities, but have found it difficult to ensure Members of Senedd understand the diversity of our experiences.

Without 'sex', there is no 'sexual orientation'. We uphold the importance of young people understanding that biological sex is real, immutable and important in their lives. Further, we emphasise that sexual orientation and 'gender identity' (a poorly defined but often used term) are not the same, and the life outcomes of these different groups are not well served by the way the Action Plan insists on bringing them together. We have seen poor results for our members, particularly younger people, in terms of their health and participation in their communities. The Education chapter of the Action Plan has 9 recommendations, together with a further 4 recommendations particularly relevant to the Committee. We have attached our responses from the consultation.

We are profoundly concerned at the promotion of gender ideology to young people. We know that young people who are same-sex attracted are experiencing pressure to adopt a trans status, and enter the pathway to medical intervention. Life skills in the critical evaluation of data and life experience is being radically undermined; young people encouraged to alter their bodies rather than join those people working for a fairer world.

We draw the Committee's attention to the growing concerns of education professionals and the public, to the poor data in this domain, and to relevant elements of the Cass Review, all addressed in more detail below. Combined with the withdrawal of supporting documents from the government's website, with no reason given, it is clear the Action Plan is outdated and in need of complete review.

We ask you to include this issue in the next work programme, in line with your work on Ministerial and legislative scrutiny and your specific concerns around children on the margins and the implementation of education reforms.

We have sent a similar but not identical letter to the Chair of the Health & Social Care Committee, and recognise this may be an opportunity for joint working.

Yours sincerely

Lesbian, Gay and Bisexual Alliance Cymru
Hawl i fod, hawl i fyw, hawl i garu yr un rhyw

(1) Increased recognition of challenges by education professionals and the public

When we responded to the draft Action Plan, we described the curriculum-based recommendations as ‘woefully disingenuous’ and condemned ploys to uncritically embed gender identity theories within schools. The concerns we raised at that time are being borne out by more recent events.

Parents are increasingly concerned to understand what their children are being taught in school, the provision of space and sex-appropriate facilities and the confusing array of policy choices being made by schools. Earlier this year Merched Cymru used FoI requests to survey schools across Wales and found a damning level of failure to ensure basic safeguarding. The full report is at https://merchedcymru.wales/wp-content/uploads/2024/03/Merched-Cymru-Toolkits_FINAL.pdf. The survey found that schools varied hugely in their responses to children questioning their gender, including unquestioning affirmation of children’s ‘trans’ identities, concealing information from parents, forced or coerced speech and not considering other reasons why a pupil may be struggling with identity issues.

The report points out ‘[s]uch approaches are incompatible with long-established and universally accepted safeguarding principles and fail to respect the privacy, safety and dignity of other children, including those with other protected characteristics. These approaches also ignore the right to belief of children, teachers and other school staff as protected under the Equality Act 2010. They are doing real harm to children and their families, as our case studies show.’

These concerns are directly related to schools’ apparent willingness to allow third party providers to teach using materials which cannot be shared with parents. The legitimate interests and beliefs of guardians and families should never be overridden by so-called commercial confidentiality. Any such requirements should automatically disqualify a provider. We have been pleased to see encouragement to share such material in the curriculum guidance on Hwb, but we continue to hear reports that schools are socially transitioning children without informing their parents. The Cass Review describes this as itself ‘an active intervention’ with potentially significant psychological effects.

Although the RSE curriculum is intended to be objective, critical and pluralistic, the Merched Cymru research shows that the most common suppliers of RSE content to Wales’s secondary schools all promote the concept of gender identity as fact. The Action Plan thus continues to endorse the teaching of content which could be profoundly harmful. In particular, we have anecdotal evidence of young people unable to speak up for being lesbian or gay – that is same-sex attracted because to do so is deemed ‘transphobic.’

Our concerns about third party materials which deny the reality of the human body being tolerated or even celebrated in our schools extend beyond the classroom. In November 2024, a leaflet from the charity Hey Girls has been handed out to primary school children in the Vale of Glamorgan, telling 11-year-olds that ‘men’ (ie girls or women with a trans identity) can have periods, and that when they do their dysphoria gets worse. A child getting to grips with menarche does not need such material which, by using the term ‘menstruating body’, simply makes it impossible to talk about the difficulties and risks she experiences. (It

also undermines their laudable work to combat period poverty.) We know parents are raising this misinformation with the LEA and schools. We have already noted that denying the biological reality of sex also undermines the truth of same-sex attraction.

The Committee will be aware of the intense public debate about sport, especially whether men who identify as women should be allowed to play on women's teams. The penalties for players in the UK who object to this position has been thrust into the limelight recently by the case of the 17-year-old girl who has received a six-match ban for challenging the presence of her bearded opponent on the opposing team, given she was concerned for her safety. (Reported by the BBC at <https://www.bbc.co.uk/sport/football/articles/cvgk0w726w1o>.) Sport is of course fundamentally important to the wellbeing of young people, as they have themselves identified (<https://www.sport.wales/research-and-insight/school-sport-survey/lifelong/#:~:text=5.2%20PE%20and%20sport%20helping,to%20achieve%20a%20healthy%20lifestyle>). Yet little study of how to attract young people into physical activity recognises the different experiences of lesbians and gay men. Although it has not been formally studied (see below), the experience of many lesbians is that sport has offered role models and a valuable social outlet. For gay men, the opposite has been true, with the pitch and the locker room known to be hostile environments.

Our view is that sex is fundamental to segregation in almost all sports, and that encouraging participation includes addressing these varied contexts between our communities. We made this position clear in our response to the Action Plan and in consultations by Sport Wales. Nonetheless, the Action Plan still focuses on people with a trans identity (recommendation 25) and does nothing to help broader physical activity.

Teacher, parent or student discomfort with the 'queered' curriculum is too often dismissed as based in prejudice and studied only as faith based. Yet we know many in all three categories whose concerns come from the failure of resources which recognise the biological, political and personal salience and immutability of sex. It is time for thorough scrutiny of the current policies driving the adoption of such policies and materials.

(2) Data changes

Studies (such as Littman, 2018, at <https://doi.org/10.1371/journal.pone.0202330>, and Rawee et al, 2024, at <https://link.springer.com/article/10.1007/s10508-024-02817-5#citeas>), the evidence of detransitioners and our own anecdotal understandings confirm that many gender-questioning young people grow up to be happy homosexuals after support with talking therapies, without risking infertility and other major health disadvantages. Yet our own youth and education services have not properly addressed the key concern that affirmation approaches end up as conversion therapy for young people who are same-sex attracted.

Almost all the data available in this area is compromised by poor samples size, self-selection, lack of longitudinal data, poor research structures and biased investigation. The Lesbian Project recently commissioned overviews into available data regarding lesbians' wellbeing which highlights the lack of definitions in much of the available material. In the

present environment is crucial to properly define ‘woman’ or ‘man’, ‘female’ or ‘male’. In securing positive outcomes in education and wellbeing, this becomes even more important.

When it comes to lesbians (and, by extension, gay men and bisexuals) it is also necessary to distinguish between identity (the most common metric at the moment), attraction and behaviour. The authors note that *‘[s]tudies that define lesbians according to self-identification, which are the majority, are likely to include trans-identifying males and exclude same-sex attracted trans-identifying females. Definitions are often inconsistent, and the self-selecting samples used in many studies limits the extent to which findings are relevant for ethnically diverse, lower-educated lesbians (among others). A further issue with using identity, rather than attraction and/or behaviour, to define sexual orientation is that findings may vary depending on the definition used.’* Of course, we know the importance of these distinctions from the communications lessons of the height of the HIV epidemic. In many contexts, it is crucial to address behaviour rather than labels.

The authors of the Lesbian Project research note in their Overview, *‘[e]ven the highest-quality evidence – systematic reviews and meta-analyses – are often poor quality when they summarise data about lesbians, due to problems with the underlying studies that inform them.’* (p3) Recognising these difficulties, their health-specific study suggests the collective research available shows that *‘bisexual women demonstrate worse [physical] health than lesbians across many studies, and lesbians tend to report worse overall health than heterosexual women ... lesbians appear to have worse mental health than heterosexual women, on average, and better mental health than bisexual women.’* (Reports available at <https://www.thelesbianproject.co.uk/resources>.)

Given the level of public concern about this issue, it is unfortunate that Welsh Government appears uninterested in staying on top of the latest research developments, or even maintaining its own website. There are over 70 documents referenced in the Plan (many of them subject to the data criticisms outlined above). At least 25 of these links are broken. Searching directly does enable access to most, but many are behind academic paywalls and at least two cannot be accessed by people affiliated with HE institutions in Wales.

To emphasise the unreliability of so much data in this area, in September 2024, the ONS downgraded its 2021 census data relating to people identifying as trans in England and Wales. This was welcomed by the Statistics Authority (<https://osr.statisticsauthority.gov.uk/news/osr-publishes-its-final-report-on-the-review-of-the-statistics-collected-on-gender-identity-during-the-england-and-wales-census/>). The core reason for the large number of positive responses seems to have been a poorly constructed question, confusing to people whose first language was not English. This difficulty was revealed by a far more credible result in Scotland where the question was different. The acceptance of such a poor approach by the well-respected ONS seems to us of a piece with the rush to accept affirmation and complex language structures which has marked the rise of a particular approach to gender.

Such findings illustrate the many difficulties for policy in simply creating a single acronym ‘LGBTQ+’ and assuming the same responses will serve all relevant communities equally. Just as Covid rightly led to a re-examination of policies and health information for ethnic

minority communities, we urge the committee to recognise the importance of disaggregating sexual orientation from 'gender identity'.

We ask that the Committee, if it agrees to a review of the Action Plan, ensures proper and robust data is key to recommendations affecting children and young people, and recognises that our concern for younger lesbians and gay men is founded in increasing evidence from those young people.

(3) The Cass Review

The final report of the Cass Review makes sobering reading for anyone who is concerned about the impact of affirmation-only approaches to young people questioning their gender and/or sexuality. It is the most thoroughly researched review of which we are aware, taking cognisance of the experience of young people, their families, professionals in the field and academic research. Baroness Cass (as she now is) has been clear about her commitment to and care for young people, and the need to ensure medical interventions are well-evidenced and in their best interests. The UK government has accepted the Cass Review in full but, after some debate, Senedd agreed only to 'note' its findings. We ask that the Committee scrutinises the importance of the Review for Government policy.

The Cass Review makes clear that data in this area has been poor, especially regarding clinical evaluation of medical interventions such as puberty blockers compared to talking therapies. Our members are especially concerned that *'[t]he Review [was not] able to obtain recent data relating to the sexual orientation of the GIDS patient cohort. When asked, mixed responses were given by GIDS clinicians about the extent to which they explore sexuality with patients seen in the service.'* (p118).

The Review was commissioned by and advises NHS England. It contains much useful information not only for the NHS in Wales but for anyone involved in the care and education of young people. Section 12 specifically looks at 'social transition' and the challenges it represents for schools and families. This chapter shows the extreme difficulty in assessing the data in this area, the real question marks over school acceptance of 'transition' and the challenges to expecting the school to keep secrets from parents.

The First Minister, in her previous role, welcomed the Review and relied on the procurement and referral routes to 'align' Wales services to the Cass recommendations. (<https://record.assembly.wales/Plenary/13906#C587182> shows her statement to Senedd in May 2024.) We welcome this statement, including her concern for service users who are 18 and over, and instruction that NHS Wales takes on board the recommendations of the Review, ensuring consistent and complete data collection.

It is our strong view that the recommendations of the Cass Review, which we support, are not compatible with the recommendations or underlying ethos of the LGBTQ+ Action Plan. For example, the Review points to the difficulties inherent in the Action Plan recommendations for 'trans guidance' for schools and a 'rights-based approach' to staff training which appears unable to acknowledge or address any actual or perceived conflict.

We continue to urge all services concerned with the wellbeing and education of young people, to invest properly in mental health services both in a clinical setting and in schools. We recognise the real risk that people in distress are pushed towards gender related services as they are perceived as better funded, rather than a caring, clinically underpinned exploration of the range of issues they may be confronting. We know that neurodivergent young people are over-represented but the reasons are not fully understood.

Given the extreme impact of cross-sex hormones, binders and surgery, we strongly urge the Committee to promote clear understanding of the impact of education policy in Wales. We also seek clarity on the current and future status of the Cass recommendations for Welsh services and the evidence base underpinning any divergence from those recommendations.

EXTRACT FROM RESPONSE BY LGBAC TO THE DRAFT LGBTQ+ ACTION PLAN 2021

(Numbers refer to the recommendations in the Plan)

<i>Education</i>		
47	The Welsh Government should provide strategic, comprehensive investment in professional learning and training on designing a fully LGBTQ+ inclusive curriculum. This should include delivering LGBTQ+ inclusive RSE for all.	<p>This recommendation is woefully incomplete and disingenuous, especially in the light of the many robust criticisms made during the recent consultation on the RSE curriculum.</p> <p>Yet again, we see no assurances as to the content, provenance or authority of proposed training. There are no assurances for what criteria will be used to ensure such case studies & learning materials are ‘quality’. Welsh Government need to specify what they consider to be of high quality and if they are evidence-based and scientifically accurate. ‘Strategic’ should not mean confirmation bias and granting of contracts for gender identity theory’s cheerleaders (all too many of whom are represented on the ‘Expert Panel’) without dissent.</p>
48	The Welsh Government should ensure that training must also act to empower professionals to adequately support LGBTQ+ young people and tackle homophobic, biphobic and transphobic bullying, by embedding a rights-based approach.	<p>The rights of children should of course be supported but again this recommendation is inadequate and the theory behind it implies a particular ideology. It is our view that Welsh Government should explicitly confirm and separate teaching biology, health, consent and rights.</p> <p>We particularly note the high numbers of trans presenting people also being autistic. It would be pertinent for staff to also be well trained in autism in order to ‘adequately support’ such young people.</p> <p>Where Welsh Government adopts a reliance on ‘rights’, such rights need to be explicitly stated and outlined to ensure they work alongside the legal duties of parents and their responsibilities for their child. For example, it is not a right for a child to be granted the ability to change their name and have the school even change their registered sex on school registers without their parents’ knowledge. This could result in schools unlawfully granting rights to a child over that of their parents or their legal guardians and risks legal action where families are torn apart unnecessarily.</p> <p>In this context, we urge Ministers to avoid even the appearance of conflict of interest. The documentation cites the AGENDA resource as something which ‘must’ be made available in all</p>

		<p>compulsory learning environments. The creator of the material sat on <i>this</i> ‘Expert Panel’ and appears to be promoting her own resource here.</p> <p>We have noted elsewhere the poor quality of the EIA. In particular, there is no recognition of the actual or perceived conflict with other groups sharing protected characteristics, eg the rights of learners of faith to undertake certain activities in sex-segregated environments.</p>
49	<p>The Welsh Government should provide a centralised suite of resources to help the families of LGBTQ+ young people.</p>	<p>There are no elements in this recommendation which recognise either an alternative perspective, the possibility of debate, or the emerging harms being inflicted on young people by gender extremist ideology. (See our response to recommendation 43 for the emerging evidence of clinical concern about the rush to affirmation and our alternative recommendations on this issue.)</p> <p>The only resource advertised in respect of this recommendation is FFLAG – an organisation which is steeped in gender identity theory. For example, its information booklets and downloads talk about young people being ‘assigned (sex) at birth’ and gives advice on medical pathways etc. Its website suggests the term ‘homosexual’ is offensive, while promoting the word ‘queer’. We utterly repudiate this abuse of language and promotion of slurs.</p> <p>FFLAG also links to other ideological organisations such as Stonewall, Mermaids, GIRES and Gendered Intelligence – all proponents of gender ideology.</p> <p>Such a recommendation (like others) might be acceptable if it linked to scientific and evidence-based organisations which genuinely sought to support children with gender dysphoria. Furthermore, the emerging evidence is that many children with gender dysphoria, if supported and enabled to go through puberty without blocking it, turn out to be gay/lesbian. Having resources which are single-mindedly based on the ideological tenets of gender identity, could be said to facilitate the conversion of many gay and lesbian children and young people.</p> <p>Alongside the risks of medicating children and introducing hormone treatment, we are strongly opposed to such dangerous practices as breast binding, promoted and endorsed by organisations supported by FFLAG.</p>

		<p>Again, we note that the ‘new RSE’ education document referenced in the documentation was overseen by a company, Recognition, owned by a prominent member of the ‘Expert Panel’. Such an apparent conflict of interest damages not only the Action Plan but the reputation of Welsh Government.</p> <p>Finally, we remind Welsh Government that the Education legislation prohibits political or partisan teaching in schools. This entire ideology is deeply partisan and conflicted. Recent debates have illustrated its deeply political nature. It could be argued that the unthinking acceptance of this ideology renders the entire Education section of this plan unacceptable.</p>
50	The Welsh Government to provide statutory national trans guidance for schools and local authorities.	<p>This is an unbalanced recommendation, and the supporting documentation reveals its roots in gender theory. Any pointers to organisations <i>must</i> be scientific and evidence-based rather than rooted in a specific ideology. A properly evidence and supported code of guidance and documentation for schools on supporting pupils expressing conflicts about their sex and gender would be useful.</p> <p>Instead, Wrexham Council trans guidance is promoted as good practice; we have a great many concerns about this and similar toolkits promoted by councils such as Rhondda Cynon Taff and Vale of Glamorgan. Indeed, RCT has recently faced court action on precisely this issue. Guidance issued by Welsh Government must adhere to the law as it is (not as Stonewall or other lobbyists might wish it to be) and recognise the wide range of issues raised in this response.</p>
51	The Welsh Government should continue to invest in hate crime prevention programmes in schools across Wales.	<p>LGB Alliance Cymru is strongly opposed to this recommendation. It should be scrapped completely and replaced with robust, high quality, anti-bullying policies which have been evidenced by their success.</p> <p>Studying the documentation from the ‘Expert Panel’ reveals the intention to use ‘<i>programmes such as police liaison programmes or working with external practitioners to deliver workshops on hate crime prevention</i>’. (See our comments on recommendation 14 regarding the failure to define or even understand the nature of ‘hate crime.’)</p> <p>We note, for example, the conviction of an autistic teenager in North Wales for his vocal confusion over the sex of a trans police community support officer.</p>

		<p>(https://www.womenarehuman.com/autistic-teen-found-guilty-of-hate-crime-for-asking-police-officers-sex-autism-group-condemns-prosecution/.) The young man’s neuro-divergence was ignored in other media comment¹ but is obviously relevant to understanding intersectional issues in creating a safe and inclusive Wales.</p> <p>The incident also illustrates the difficulty for teachers in an approach rooted in criminalisation rather than in understanding difference and addressing bullying.</p> <p>This recommendations risks criminalising children for objecting to an ideology they either don’t agree with or don’t believe in. It teaches children that differences of opinion and points of view are criminal, in direct contradiction to the importance of free speech to democratic renewal.²</p> <p>The Equality Impact Assessment should address this issue, particularly with regards to the effect this may have on free speech and children’s ability to express any objections to certain tenets of ideology as a category of protected belief.</p> <p>For example, Welsh Government should ask whether young people are allowed to reject gender identity ideology. What if a young lesbian rejects the advances of a trans-identifying boy? Will that be seen as ‘discriminatory’ or worse still, transphobic and therefore a ‘hate crime’? What happens to children with learning difficulties who find the complexities extremely difficult to grasp and retain?</p> <p>Children should be taught <i>how</i> to think (for themselves), not <i>what</i> to think (by others).</p>
52	<p>The Welsh Government should explore how they can support Colleges and Universities in Wales to develop and maintain LGBTQ+ inclusive environments, potentially through establishing an Excellence Mark to recognise best practice.</p>	<p>We are opposed to (another) scheme or marketing ploy designed to embed gender identity theory without critique. Welsh Government will have seen the increasing concern about the existing Champions Scheme run by Stonewall, not least the recognition that it promotes incorrect views on the legislation involved. (A detailed analysis can be found at https://legalfeminist.org.uk/2021/02/01/submission-and-compliance/.)</p>

¹ For example, <https://www.walesonline.co.uk/news/wales-news/teen-prosecuted-after-asking-whether-17651755>

² For a recent analysis of this relationship see <https://www.wcia.org.uk/blogs/democracy-under-attack-freedom-of-information-speech/>

		<p>We are concerned that setting an ‘Excellence Mark’, will utilise the model of the Stonewall Workplace Equality Index, which simply affords that group the opportunity to profit from such a system. Only Stonewall are put forward as an example to follow. Instead, Estyn should be sufficient to ensure best practice in Further Education, regarding LGBTQ+ inclusivity and other equalities matters. Universities should be free to operate within the law in order to maximise their own financial gains.</p> <p>An ‘Excellence Mark’ will potentially engender discriminatory ranking in terms of treatment of one group over another and enable institutions to capitalise on the ‘kudos’ of having that ‘mark’. We recommend that colleges and universities be encouraged to develop best teaching practice, where equality and diversity is embedded throughout the curriculum, while upholding core academic and democratic values of free speech.</p>
53	The Welsh Government should consider options for the targeted funding of academic research into the experiences of the LGBTQ+ population of Wales.	<p>The recommendation appears uncontroversial but we note that impartiality is lacking. The ‘Expert Panel’ states that <i>there remains a number of significant research gaps in regard to LGBTQ+ people’s experiences in Wales.</i> For once, we agree with them. However, we do not trust this Panel, or any volunteer-led successor, to oversee rigorous or useful research.</p> <p>The work done so far has been focussed heavily on the ‘felt identity’ of “queer” people, rather than the material reality of LGB people, many of whom reject the label, ‘queer’. There is no real evidence provided (beyond one focus group) of any effort to research the diversity of experience or opinion in Wales. Where there is research it is all too often, partial, lacking in quality or heavily biased. (See part 4 of this response.)</p> <p>If Welsh Government is to undertake or commission any further research into the experiences of LGBTQ+ individuals or communities in Wales, it must ensure it is rigorous and independent, and that it must consider issues such as selfID, gay/lesbian dating sites and single-sex spaces. If it claims to explore the experiences of all these diverse communities, it must do so honestly, rather than focusing only on the lives of one group.</p>
54	The Welsh Government should work with Careers Wales to improve the delivery of specific careers support for LGBTQ+ young people.	<p>We recognise that young people in the LGBTQ+ communities face specific challenges in deciding and entering their chosen careers. In that context, we welcome this approach.</p>

		<p>We are, again, concerned that there is no assurance of a broad range of approaches; the evidence base is narrow (relying on one Stonewall report) and leaving the issue with Careers Wales to sort out. We fear that this recommendation, rather than focusing on young people (especially post-Covid), was an afterthought on reviewing the life-journey model of the plan.</p> <p>We would welcome a broader review of this issue, related to our concerns about removing identifiers on recruitment, set out above at recommendation 11.</p>
55	The Welsh Government should examine how well LGBTQ+ people can access lifelong learning opportunities.	We support this recommendation, in the context of our broad concerns about definition, free speech and data collection.
<i>Other recommendations of particular relevance to the Committee</i>		
15	Work with the tech companies and media platforms to tackle hate crime and misinformation.	<p>We recognise the acute challenges represented by the social media platforms' failures to address misinformation, for example on the pandemic. However, this recommendation is completely unrealistic, especially when government will not even put age restrictions on pornography which brutalises and dehumanises women. Welsh Government should also be aware that lesbian and bisexual women are specifically fetishised and brutalised in pornography and this is taken onto the streets of our towns and cities.</p> <p>At the very least, such a recommendation requires workable and genuinely intersectional definitions of 'hate crime' and 'misinformation' . Will calling people (including many authors of this response) a 'terf' become a hate crime? (See https://www.feministcurrent.com/2017/09/21/terf-isnt-slur-hate-speech/ for some context.) Without an approach which includes misogyny, we cannot support this recommendation.</p> <p>We note the existing challenges to free speech through the growth of misconceived legislation and policing at our response to recommendation 14. Given the ideological content on this Action Plan, this recommendation has the potential to become repressive.</p>
19.	Work with the youth work sector to find a longer term sustainable funding model for organisations, including in the voluntary sector, who provide	Whilst we support the need for sustainable funding, we particularly want to ensure that young people are not encouraged down a pathway of irreversible medical intervention because of peer, online or parental pressure.

	<p>support for a wide range of young people with differing backgrounds and needs, including support for LGBTQ+ young people. Future strategies including the work of the Interim Youth Work board should consider equality and diversity for all young people.</p>	<p>We strongly assert that more inclusive youth work should not become a cover for unquestioning affirmation but be part of watchful waiting for young people questioning their sexuality or gender.</p> <p>We are horrified at the explosion of young girls seeking gender identity services in recent years. We understand that there is also a very recent but detectable rise among young boys³. We consider this an indictment of our society that young women would rather submit to radical surgery and hormonal change than be happy, healthy adults in their bodies, and quite possibly lesbians.</p> <p>Rather than a culture of such assaults on bodily integrity and health, youth work should be challenging the stereotypes and misogyny which is driving young people into such pathways.</p>
23.	<p>REPRESENTATION – Culture & Sport</p> <ul style="list-style-type: none"> ● Reach out to LGBTQ+ individuals, groups and communities inviting them to support the design and development of holistic approaches across the Culture and Sport sectors in Wales, and building on the existing work of public bodies represented in the Public Body Equality Partnership. ● Improve LGBTQ+ representation in the Culture & Sport sectors in Wales at all levels, including at Board, workforce and volunteers’ levels. ● Use national and local collections in the Culture and Sport sectors in Wales to celebrate and share LGBTQ+ stories and histories, providing funding where appropriate. ● Consider how to provide greater focus on equality as part of skills development, work 	<p>We have been pleased to contribute to the equality debates promoted by Sport Wales earlier this year. We pointed out that sport is an area where the experiences of different communities gathered under the leaky ‘umbrella’ of ‘LGBTQ+’ vary widely. We recommend that the Welsh Government and Sport Wales should do further research on those different experiences, the value of role models, of bonding, or access to facilities. For example, many, many gay men have experienced extreme bullying within the sports environment, sometimes with tragic results. By comparison, lesbians have often found sporting environments a haven with strong role models emerging, especially over the last 50 years.</p> <p>Sport is also contested around single sex spaces. We assert the importance of enabling single sex spaces, particularly for young people (male or female) and for people of faith. It is unfortunate that the focus groups, so narrowly drawn, prioritise only one person’s experience (however disturbing) without considering the broader impacts on other groups with protected characteristics of recommending mixed sex facilities.</p> <p>We agree with the aim to improve representation and access but repeat our ambition for better understanding of how sport and access to sport differs among our communities.</p>

³ Helen Joyce, interviewed on *A Wider Lens*, September 2021

	<p>experience, volunteering, mentoring and apprenticeship opportunities.</p>	<p>We agree to the ambition to use national and local collections to better reveal the stories of our communities. We hope that if funding is available it is used to uplift all marginalised communities, and that where a sportsperson has clearly identified themselves as (for instance) gay, they are not later misidentified or put into a broader category that does not represent their experience.</p> <p>We always welcome a greater emphasis on equality and representation. Our general comments on overarching aims demonstrate our concerns about how this is being interpreted by Welsh Government to stifle opinions and erase the experiences and reality of lesbians, gay men and bisexuals.</p>
30.	<p>Evaluate specific LGBTQ+ projects, such as the Ty Pride project, and gather best practices and principles to share with local authorities regarding LGBTQ+ homelessness.</p>	<p>We welcome the desire to promote best practice, within the general context of our concerns about data collection and definitions.</p> <p>We note that the Ty Pride project claims LGBTQ+ young people are ‘five times more likely to be made homeless than their peers’. We have seen no source for this claim and would welcome well-evidenced and robust research into the experiences of our communities. The failure to disaggregate and examine such claims makes identification of good practice much more difficult. In our response to recommendation 13 we assert that more inclusive youth work must not become a cover for unquestioning affirmation but be part of watchful waiting for young people questioning their sexuality or gender. The same caveat applies to specialist homelessness provision for young people.</p>

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Buffy Williams MS
Chair of the Children, Young People and Education Committee
Senedd Cymru

Email address: SeneddPlant@Senedd.Cymru

4 December 2024

Annwyl Gadeirydd,

Re: The Welsh Language and Education Bill – additional evidence from the
Coleg Cymraeg Cenedlaethol

As you are aware, the Coleg Cymraeg Cenedlaethol (the Coleg) supports the aims and objectives of the Welsh Language and Education Bill and has made this clear in our evidence during Stage 1 of the scrutiny process.

We very much welcome the Bill's aim of ensuring that, over time, everyone leaves the compulsory education sector in Wales an independent Welsh speaker (B2 level). The aim poses a particular challenge for the tertiary sector to ensure that suitable progression pathways are in place for learners to continue to maintain, use and develop their Welsh language skills throughout their time in the tertiary sector before entering the world of work.

We very much welcome comments by Mark Drakeford MS, Cabinet Secretary for Finance and the Welsh Language, in his evidence to the Children, Young People and Education Committee on 24 October on tertiary education, and his willingness to look again at the elements of the Bill relating to this sector, which is the Coleg's main area of interest. His

comments were constructive, and his willingness to offer the clarity needed on the face of the Bill and in the Explanatory Memorandum, were very welcome.

As the committee produces its report on Stage 1 of the Bill, we write to you to offer additional evidence regarding two specific issues raised as part of our written and oral evidence, namely, Welsh as a subject and the education workforce.

Welsh as a subject

Due to time constraints during our evidence session to the committee on 17 October, we were unable to provide much detail on this aspect of the Bill. This letter therefore outlines why the Coleg believes that the protection of Welsh as a subject (e.g. GCSEs, A-levels, degree in Welsh) is such an important issue and one that merits attention on the face of the Bill.

Specific provision is required in the National Framework for Welsh as a subject, particularly for learners beyond compulsory school age. Welsh as a subject is not distinguishable from the categories listed in section 35(a), so we believe there is a risk of missing important opportunities to protect and develop this fragile and vital subject.

Although Welsh is a mandatory part of the curriculum for all school years in the statutory period including Years 10 and 11, the pattern of post-16 provision is extremely fragile. We know that it can be challenging to convince learners to study the subject, for a variety of reasons; but even when a group of learners want to study AS or A level, the provision is not necessarily available. While e-sgol is an alternative option in some cases, the reality is that we are losing learners (First and Second Language) every year in a subject that cannot afford to lose them (see Appendix 1 below).

Education in Welsh as a subject is the main means of creating proficient users (C1 and C2). In practice, only by protecting and promoting Welsh A levels (First and Second Language) will we create significant workforces with advanced skills in Welsh, particularly teachers who can teach Welsh or teach through the medium of Welsh and Welsh tutors. Increasing these workforces is key to achieving the objectives of the Bill.

The challenges facing Welsh as a subject are complex and involve a number of factors. We are not suggesting that the Bill itself can address all of these, but rather, we consider that there are significant benefits to referring on the face of the Bill to Welsh as a subject as one of the areas that Welsh Ministers will be required to address in the National Framework.

We suggest that there are three options in relation to potential amendments that would realise the policy aim of conserving and promoting Welsh as a subject, namely:

Option 1: Subsection 23(1) could be modified by adding a new clause (d):

"(d) in relation to Welsh as a subject, including for the purposes of GCSEs and A-levels"

Option 2: A new subsection could be added to section 23 stating:

"23

(...)

(X) Welsh language education in section 23(1) includes the teaching of Welsh as a subject including for the purposes of GCSEs and A-levels.

Option 3: The definition of "Welsh language education" could be further amended in section 35(a) of the Bill as follows:

"35. Interpretation

In this Part –

a. "Welsh language education" means –

- i. teaching Welsh,
- ii. education and training through the medium of Welsh,
- iii. **teaching Welsh as a subject, including for GCSE and A-level qualification purposes.**

in a school, for pupils of compulsory school age **or within tertiary education** ;

The education workforce

The Coleg, along with a significant number of other stakeholders who gave evidence to the committee during Stage 1, has expressed concern about the Bill's reliance on an education workforce with adequate Welsh language skills to implement the proposals.

We recognise that the Bill provides for action in relation to the education workforce by local authorities (identifying steps to ensure that sufficient education practitioners work in the area), and by the Institute (in relation to improving Welsh language teaching methods, and providing opportunities to learn Welsh and improve levels of ability in Welsh).

However, the Coleg believes that this does not address an essential piece of the jigsaw, namely the provision of Initial Teacher Education and the need to ensure that provision is designed and delivered in the most strategic manner possible from a national perspective.

For that reason, we remain supportive of the Welsh Language Commissioner's proposal to "placing a duty in the Bill on Welsh Ministers to produce and publish a Welsh in Education Workforce Plan as part of the National Framework for Welsh Language Education and Learning Welsh."¹

While the current Welsh in Education Workforce Plan has pulled together a number of strands and stakeholders in terms of Welsh education workforce planning, it does not, in our view, go far enough and lacks sufficient status among stakeholders to deliver the strategic progress needed.

We strongly support the Bill and therefore the aim of this letter is to ensure that it takes every possible opportunity to realise the Government's objectives. Legislating offers a golden opportunity to ensure that the anticipated progress in education through the medium of Welsh and in Welsh as a subject happens seamlessly across the whole education system. The Coleg is very keen to play a key role in making this vision a reality.

We trust that as a committee you will consider our suggestions in this letter as you produce your report on Stage 1 of the Bill. If you would like further information do not hesitate to contact Gwenllian Griffiths, the Coleg's

¹<https://business.senedd.wales/documents/s154162/WLE%207%20Welsh%20Language%20Commissioner.pdf>

Director of Policy, Communications and Engagement by emailing g.griffiths@colegcymraeg.ac.uk.

Yn gywir,



Dr Ioan Matthews

Chief Executive

Appendix 1

Year	First language Welsh	Second language Welsh
2008/09	304	489
2009/10	318	410
2010/11	302	410
2011/12	257	400
2012/13	287	356
2013/14	252	312
2014/15	280	272
2015/16	246	245
2016/17	214	242
2017/18	231	216
2018/19	256	164
2019/20	244	158
2020/21	231	195
2021/22	206	160
2022/23	176	112

Table 1: Number of entries for Welsh A levels and Welsh Second Language A levels (aged 17 pupils only) - [A level entries and results \(aged 17 pupils only\) by subject group \(gov.cymru\)](#)

Agenda Item 4.11

Llamau

Imagine a World Without
Homelessness

Head Office
23-25 Cathedral Road
Cardiff
CF11 9HA

029 2023 9585
www.llamau.org.uk

4th December 2024

Dear Buffy,

We are writing to you in your role as Chair of the Children, Young People and Education Committee and attach a copy of our response to the Finance Committee's consultation on the budget. The vast majority of the services Llamau provide across Wales support children and young people, and we felt it important for your committee to hear our concerns and pleas for the new Budget from 2025-2026. We also deliver a number of services in your constituency that support young people, women and children.

We are extremely concerned about the financial situation charities like Llamau are being placed in. Charities across Wales are going to be hugely impacted by the UK Government's budget decision to increase National Insurance Employer contributions. Whilst I appreciate this is not a Welsh Government decision, the impact of this decision will be felt throughout Wales. The NI Employer Contribution will cost Llamau an additional £500k per annum from April 2025.

With nearly all commissioned services not paying full cost recovery, charities like Llamau simply cannot manage without additional funding to meet these costs. If services or charities close, the pressure on public services will hugely increase.

A recent Cymorth Cymru survey of homelessness and housing support providers in Wales found that a failure to increase the Housing Support Grant would result in 74% of providers likely to reduce service capacity, 61% unlikely to bid for new or retendered contracts and 47% likely to hand back existing contracts. This survey was conducted before the UK Government Autumn Budget, and there are now significant concerns that the increase in National Insurance contributions have the potential to push these support providers over the edge.

Llamau were delighted last year, when the Welsh Government Budget increased Housing Support Grant by £13million to allow the sector to finally move towards paying Real Living Wage. At Llamau we were able to use this money to achieve the then current Real Living Wage rates; however, without an additional increase to Housing Support Grant in the Welsh Government Budget for 2025/2026, we will not be able to maintain this. Last year's increase was the first increase in 15 years.

The work of Llamau and the homelessness and housing support sector more generally, can demonstrate a positive lifelong impact on the people we support, helping them leave homelessness behind for good and enabling them to become economically active and financially independent. For example, at our Impact Event at the Senedd last month, a young man spoke who we supported over 12 years ago when he was 15. Our support lasted for around 3 years and included providing him with safe and secure supported accommodation as well as attending our education and training provision. We then helped him move into his own accommodation, where he still lives and supported him to access employment. He has been employed ever since.

Without an increase to our funding, to allow us to recruit and retain colleagues on an acceptable wage, services will end and again the people most need in Wales will suffer.

We sincerely hope that the forthcoming Welsh Government budget for 2025/2026 contains the following to ensure our sector both continues to support individuals to leave homelessness behind for good, and allows charities and support providers to continue supporting the pressures on public sector services:

- Provide additional funding to cover the additional National Insurance costs facing charities providing Housing Support Grant and other Welsh Government or local authority funded homelessness, housing support and Social Services contracts in Wales.
- Provide additional funding to allow charities delivering these services to maintain Real Living Wage salaries.

We desperately need your and the committee's support. Without an uplift to the Housing Support Grant for the financial year 2024/25, there is a real risk of services collapsing and vulnerable people being left with nowhere and no one to turn to.

I would also like to take this opportunity to invite you and/or committee members to visit some of our services and meet with incredible young people and women who are being supported by Llamau to overcome homelessness.

Best wishes,



Sam Austin, Frances Beecher

Chief Executives, Llamau

Llamau Submission to the Finance Committee:

Welsh Government Draft Budget proposals for 2025-26.

Introduction

Homelessness and housing support services in Wales continue to face significant pressures. Demand for Llamau's services has increased substantially, and with it, an increase in the number of young people, women and children we support who are presenting with very complex support needs. Our funding is for 'Housing Related Support', yet we continue to provide so much more than that, which simply isn't factored in – or paid for - in existing contracts. In some cases, it is this work which is literally keeping people with a history of serious self-harm, or suicide attempts, alive.

The Welsh Government's final budget for 2024/25 included a £13 million uplift to the Housing Support Grant (HSG), having initially allocated flatline funding. We were pleased that Ministers listened to the compelling case to find extra resources, which equated to a 7.8% increase from the previous year. Much of this was used to address pay pressures, in line with the Government's commitment that all frontline staff should be paid the Real Living Wage. However, facing challenges of their own in funding statutory services, Local Authority contracts did not cover this in full. (See Staff Wellbeing and Retention section).

We note that the Ending Homelessness National Advisory Board's autumn update, published on 23rd October 2024, states that despite continued financial challenges facing Government, 'Board members have expressed the need to protect the gains made in the last budgetary settlement and continue to invest in HSG and the workforce'.

There are clear reasons for this. The cost of delivering services has increased significantly and many of our contracts are paid between 20% and 30% less than the real cost for funding these services. We are already subsidising low value contracts through our own charitable fundraising, but this is becoming more and more challenging as businesses and individuals face their own difficulties. Our fundraising efforts through trusts and foundations is limited because of the size of Llamau's turnover.

In addition, the recent UK budget announcement that the amount we must pay on employees' national insurance contributions will increase from 13.8% to 15% from April 2025, will significantly impact third sector organisations across Wales, costing Llamau an additional £500,000 next year alone.

Increase in demand for services:

In common with organisations across the sector there has been an increase in demand for our services. In the last year, over 11,000 young people, women and children were reached by Llamau across all services. This includes:

- Over 5,500 people including children supported by Llamau's domestic abuse service
- Over 5000 young people supported by our range of Early Intervention & Prevention, Safe Home and Move on services
- Over 200 people, including children, were supported by Llamau's domestic abuse refuges
- Over 1500 young people were supported by Llamau's floating support services
- Over 500 young people at risk of homelessness were supported through Llamau's supported accommodation for youth services across Wales
- Over 300 young people were supported by Llamau's Family Mediation Service
- Nearly 1,000 children were supported by Llamau's Debrief and Mediation services for missing children in Gwent and Dyfed Powys
- Over 500 young people received specialist advice and support, including through the Youth Homeless Helpline.
- Nearly 400 young people were supported through Llamau's Learning, Training and Employment programmes
- Over 1700 people and children were supported by Llamau's range of Domestic Abuse Outreach Services
- 36 young people with complex needs were supported at our range of Housing First for Youth projects across Wales
- Nearly 550 people were identified at risk and supported by our IRIS service
- Over 300 people engaged with our specialist counselling services

Referrals have continued to increase for refuge spaces across Llamau, with 296 referrals for our 67 spaces in 2023/24. During this year we increased capacity by opening 3 dispersed refuges, 2 in Merthyr CBC and 1 in Caerphilly CBC. Demand for spaces meant we were unable to accommodate 187 referrals primarily due to there being no space available, unsuitable for person's needs, or risk area too close to refuge. In the community, our Floating Support services received 999 referrals; an increase of 110% compared to the previous year.

Llamau's Youth Homeless Helpline continues to provide out-of-hours support for young people who are homeless or at risk of homelessness. The number of calls has increased significantly since last year however – an increase of 81% on the 157 calls received during 2022/23.

Staff wellbeing and retention:

Recruitment and retention of colleagues continues to be a challenge for the health and social care sector in Wales and for Llamau. The increased demand and complexity of support needs, coupled with restricted funding is impacting staff wellbeing and sickness. We are working with far more young people and women with significantly higher mental health needs, including serious self-harm and suicide ideation. For the first time ever, we are seeing many young people we support carrying weapons and threatening staff. In addition, we are losing well trained colleagues to Local Authorities, who are setting up 'in house' services, and offering 10% more in terms of salary.

The staff turnover rate continues to be much higher than before the Covid pandemic but has remained static over the last year. We have had to start relying on agency staff while we recruit - leading to higher costs (not covered by contracts) and lower quality. We have continued to make improvements to our recruitment, onboarding and induction processes but the costs of HSG services do not cover full salaries, the necessary training, or PIE services for example, even though we must demonstrate all of these at audit and tender/retendering.

Following the increase to the HSG in the final budget for 2024/25, there was a clear expectation from Government that this should be used to address pay pressures and assist commissioners in supporting providers to deliver on the commitment to Fair Work and the Real Living Wage. Llamau currently pays all staff the Real Living Wage, but this is not covered through the contracts and has had to be subsidised by fundraising efforts and by using reserves. To maintain the Real Living Wage increase for 25/26, alongside the additional costs of increases to National Insurance Employer Contributions, will cost Llamau approximately £1.5million. This is not sustainable and without additional funding for the sector for 25/26, we cannot meet these costs.

Real Living Wage, National Insurance Employer contribution rises, and inflationary increases mean we would need an increase in HSG funding of 7.9% to meet these costs. If there is no such inflation-linked increase in HSG funded contracts next year, it is likely that we will have to reduce service capacity, leave vacant staff posts unfilled and potentially make staff redundant. Without further support to ensure fair wages for our staff, we would certainly be unable to pay Real Living Wage for 25/26 and will be unlikely to award *any* pay increases to colleagues within the organisation.

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).

The sector is consistently being told by commissioners that prevention services are at risk as they face their own funding challenges and feel they need to concentrate funding on crisis interventions. This is, in our view, a false economy as the preventative and early intervention services save money in the longer term, as these examples show:

- Mediation can sustainably prevent family relationship breakdown and the costly crisis of homelessness for a young person; saving over £27,000 per person in specialist supported accommodation costs.
- Family relationship breakdown is consistently shown to be the main driver of youth homelessness. Targeted early intervention like our mediation services can successfully enable young people to remain safely in their family home, preventing the significant costs of often inappropriate temporary accommodation – shown to have doubled in Wales in the last 5 years to over £40m.
- Supporting an individual to better manage their mental health through our specialist services such as counselling has a profound impact on their happiness and quality of life. Nearly £5 billion is lost through reduced productivity and healthcare costs in Wales annually.

- By facilitating re-engagement with education and preventing exclusion, our EMPHASIS outreach services can save the state an estimated £370,000 in lifetime education, benefits, healthcare, and criminal justice costs.

The lack of preventative spend is short sighted. It can take some years for prevention programmes to work and ease future demands on services, so during a funding crisis they are often the first areas of expenditure to be cut – even though it will result in higher spend in the future.

Is the support provided by the Welsh Government for third sector organisations, which face increased demand for services as a consequence of the cost-of-living crisis and the pandemic, sufficient?

As documented above, we have seen an increase in complexity of needs and risk for the young people we are supporting, with greater experience of trauma and associated mental health and well-being needs. This is at a time when support from other agencies is more difficult to access.

In the last year, the number of women facing homelessness because of domestic abuse has also risen. This has been coupled with a slowdown in the availability of move on properties for women and families due to unprecedented demand for accommodation, and more general homelessness pressures.

Some of the longer-term impacts of the pandemic are only now becoming clear in terms of the number of highly complex cases being referred to support services such as ours.

Conclusion

Llamau has always strived to deliver high-quality, effective support services and the impact of our work reduces pressure on public services across Wales. However, it is difficult to see how these services can be maintained at the current level without a significant increase in funding via the HSG. The whole sector is struggling with increased demand, the complexity of needs and a lack of funding to properly cover the cost of the services provided.

There is simply nowhere else to turn to in terms of cost savings.