

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

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Meeting Venue:

**Committee Room 3 (Senedd)**

Meeting date: 7 July 2025

Meeting time: 11.00

For further information contact:

**Rhys Morgan**

Committee Clerk

0300 200 6565

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### **Pre-meeting**

(10.30 – 11.00)

### **Public Meeting**

(11.00 – 16.30)

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

(11.00)

#### **2 Post-legislative scrutiny of the Future Generations Act: evidence session four**

(11.00 – 12.00)

(Pages 1 – 55)

Councillor Mary-Ann Brocklesby, Leader of Monmouthshire Council

Wayne Tucker, Senior Policy & Partnership Officer, Newport Council

Robyn Lovelock, Insight, Strategy & Delivery Manager, Denbighshire County Council

### **Lunch**

(12.00 – 13.00)

#### **3 Post-legislative scrutiny of the Future Generations Act: evidence session five**

(13.00 – 14.00)

(Pages 56 – 71)

Fen Turner, Integrated Approaches to Natural Resources and Climate Change

Team Leader, Natural Resources Wales



Philip Daniels, Executive Director of Public Health at Cwm Taf Morgannwg University Health Board

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

## **Break**

(14.00 – 14.15)

## **4 Post-legislative scrutiny of the Future Generations Act: evidence session six**

(14.15 – 15.15)

(Pages 72 – 74)

Geoff Ogden, Chief Transport Planning and Development Officer, Transport for Wales

Philip Blaker, Chief Executive, Qualifications Wales

## **Break**

(15.15 – 15.30)

## **5 Post-legislative scrutiny of the Future Generations Act: evidence session seven**

(15.30 – 16.30)

(Pages 75 – 99)

Dr Lindsay Cordery-Bruce, Chief Executive, WCVA

Rachel Wolfendale, Programme Manager, The Co-Production Network

Hazel Lloyd Lubran, Chief Officer, Ceredigion Association of Voluntary Organisations (CAVCO) and Chair of the Ceredigion Public Services Board and West Wales Regional Partnership Board

## **6 Papers to note**

(16.30)

### **6.1 Correspondence from the Welsh Government to the Chair of the Legislation, Justice and the Constitution Committee regarding Inter-Institutional Relations Agreement: Safety, Security and Migration Interministerial Group**

(Pages 100 – 101)

**6.2 Correspondence from the Cabinet Secretary for Social Justice, Trefnydd and Chief Whip to the Chair regarding recommendation 1 of the Committee's report on tackling fuel poverty: 'Turning up the heat before 2160'**  
(Page 102)

**6.3 Correspondence between the Department for Work and Pensions and the social justice committees of the Northern Ireland Assembly, Scottish Parliament and Welsh Parliament**  
(Pages 103 – 107)

**7 Motion under Standing Order 17.42 (vi) to exclude the public for the remainder of today's meeting**  
(16.30)

**Private Session**  
(16.30 – 16.45)

**8 Post-legislative scrutiny of the Future Generations Act: consideration of evidence**  
(16.30 – 16.45)

Document is Restricted

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

Names if Appropriate

Contact: [luke.nicholas@wlga.gov.uk](mailto:luke.nicholas@wlga.gov.uk) / [paula.walters@wlga.gov.uk](mailto:paula.walters@wlga.gov.uk)

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Senedd Cymru | Welsh Parliament

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

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

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### Introduction to the WLGA

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

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

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

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

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

#### **We'll achieve our vision by**

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



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

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

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

### **Background**

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

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

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



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



recommendation on streamlining partnership structures across Wales to improve efficiency,

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

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

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



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

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

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

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



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

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

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

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

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



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

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

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



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

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

Pack Page 40

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

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

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

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



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28<sup>th</sup> May 2025

To whom it may concern:

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

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

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

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

Kind regards

Robyn Lovelock  
Insight, Strategy and Delivery Manager

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

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

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

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

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

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

	<p>which would be fine if it led to stronger decisions – but without funding/power that time is needed on more impactful initiatives amid such a tight operating environment. Although the annual PSB Support Grant provides some assistance, its administrative requirements and restrictive criteria often limit the ability to pursue truly meaningful and innovative projects. In a similar vein, we have participated regionally in the North Wales Insight Partnership as an attempt to coordinate and share resources. The support of the Wales Co-Production Network has been invaluable in the Insight (and wider PSB) work, but remains constrained by lack of resource.</p>
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# Agenda Item 3

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Senedd Cymru | Welsh Parliament

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

Ymateb gan: Cyfoeth Naturiol Cymru | Evidence from: Natural Resources Wales

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

### 1.0 Written evidence submitted by Natural Resources Wales

**1.1** Natural Resources Wales (NRW) is a named public body under the Well-being of Future Generations (Wales) Act 2015 (WFG Act) and a statutory member of all Public Service Boards (PSBs). Our organisational well-being objectives include a focus on collective action towards nature's recovery, resilience to climate change and minimising pollution.

Our roles include being an advisor to Welsh Government, regulating industries and providing environmental licences, being the statutory nature conservation body for Wales, land manager for around seven percent of Wales, Category One emergency responder, statutory consultee (for planning applications and other statutory processes), and collaborator on environmental projects.

As the principal Welsh Government-sponsored environmental body, NRW plays a critical role in delivering the WFG Act at the national level. Its statutory purpose, pursuing the *sustainable management of natural resources*, is central to ensuring present and future generations have a Wales capable of meeting their social, economic, cultural and environmental well-being needs.

1.2 This evidence draws on input from policy leads, decision makers and practitioners across NRW. Our submission is organised around seven key issues aligned to the committee's terms of reference:

### 2.0 Key Issues

#### 2.1 Key Issues

- **Social & Environmental Justice:**

There is some progress towards the sustainable management of natural resources and Wales achieving environmental aspects of sustainable development but it is too slow to meet the needs of current and future generations. Unless this is addressed, existing inequalities will become entrenched, perpetuating social injustice and limiting opportunities for communities to thrive.

- **Embedding the WFG Act into the Wider System:**  
The Well-being of Future Generations (Wales) Act can only succeed if it is embedded across all relevant sectors. There must be a concerted effort to align environmental legislation, governance structures, funding mechanisms and public sector culture, so that sustainable natural resource management and environmental well-being are mainstreamed into everyday decision-making. Without this systemic shift, the Act's transformative ambitions will remain out of reach.
- **Linking Sustainable Management of Nature and Environmental Well-being:**  
To operationalise the goals of the WFG Act, the link between the sustainable management of natural resources and environmental well-being must be clearly defined in legislation, guidance, and monitoring frameworks. This integration would provide practitioners with a coherent, consistent, and streamlined approach to delivering and assessing environmental outcomes, supporting more equitable and effective decision-making.
- **Empowering Public Services Boards (PSBs) for Local Action:**  
Public Services Boards (PSBs) play a critical role in delivering well-being locally, but they often lack the capacity and resources to make a meaningful difference. Strengthening PSBs' capability to influence and direct resources would enable them to address local priorities more effectively, support community resilience, and tackle place-based inequalities.
- **Strengthening Climate Governance:**  
Wales currently lacks a single, cross-sectoral climate change coordinating body, leading to fragmented and inconsistent action on climate. Establishing a dedicated climate governance organisation—or enhancing the Future Generations Commissioner's role to convene climate action—could help bridge this gap, ensuring a coordinated, inclusive, and ambitious response to climate risks that are already compounding social inequalities.
- **Integrated Land and Marine Use Framework:**  
Developing a multifunctional framework for land and marine use is essential to navigate different land management and use options—such as food, energy, biodiversity, and climate resilience—and to maximise benefits for both people and nature. This strategic approach would also help address the unequal distribution of environmental harms and benefits, ensuring that disadvantaged communities are not left behind.
- **Maintaining a Proactive, Collaborative Approach to the WFG Act:**  
Shifting towards an enforcement-led approach could risk undermining the Act's effectiveness by prioritising short-term compliance over systemic, preventative, and transformative actions.

The following section explores our key issues aligned to the committee's terms of reference.

## 3.0 How far the intended objective of the Act is being achieved.

- 4 **3.1 National Well-being** - NRW is required to assess the extent to which Wales is managing natural resources (and therefore as a nation maximising our contribution to the seven well-being goals) every five years in its State of Natural Resources Report (SoNaRR).
- 5 The two previous reports assessed the state of natural resources and found that Wales is not managing its natural resources in a sustainable way. They also found that our use of global natural resources is not sustainable or equitable.
- 6 Both reports explored the direct causes of this unsustainable management, such as pollution and climate change. They also described the indirect causes – human activities such as economic systems, technological developments, human behaviours and governance.

The second State of Natural Resources Report ([SoNaRR2020](#)), which you can find on our website, introduced the four aims of SMNR, using them to structure the assessment and to identify opportunities for action to improve the sustainable management of natural resources. This report concluded that Wales is not yet meeting the four long-term aims of sustainable use of nature. We highlighted the need for transformational change in the big socio-economic systems impacting on the environment, the three largest being the energy, transport and food systems.

Four years on from the last SoNaRR, the global challenges of nature loss, climate change, pollution and waste have intensified. Human activities continue to harm the ability of the planet to provide all that we need for our well-being. UN Environment Programme's Medium-Term Strategy, highlights how three interconnected crises – climate change, biodiversity loss and pollution – are putting global economic and social well-being at risk, and undermine opportunities to reduce poverty and improve lives. However, if we act together and act now, with the right responses we can repair the damage to our natural resources for the benefit of current and future generations in Wales.

The scale and causes of climate change was reiterated in 2023 by the UN Intergovernmental Panel on Climate Change. The 3rd UK Climate Change Risk Assessment has highlighted risks for Wales which require increased and urgent action. You can read our most recent SoNaRR interim report on our website.

**6.0 Local well-being** – Practitioners involved in delivering improvements to well-being at the local level through PSB partnerships consistently report that whilst the framework of collaborative governance created through the PSBs has led to improved ways of working between public sector partners, these partnerships are still failing to move the dial on well-being at the community level.

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

Pack Page 58

**4.1 Proposed Legislation** - In response to international commitments to address the

causes of environmental degradation, highlighted in the SoNaRR report, Wales plans to incorporate its commitments to the new UN Global Biodiversity Framework (GBF) through

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the Environment (Principles, Governance and Biodiversity Targets) (Wales) Bill. This Bill will establish statutory biodiversity targets and supporting indicators. In our response to the *Securing a Sustainable Future* white paper, we highlighted the need for greater accountability and more active reporting on the Section 6 duty in the Environment (Wales) Act 2016 across the public sector. We understand the new Bill aims to strengthen this duty and enhance accountability and reporting.

There is a strong correlation and clear synergy between the Well-being of Future Generations (Wales) Act and the GBF, presenting significant opportunities for Welsh Government and the wider public sector to work collaboratively to deliver the GBF's 2050 vision. Any redrafting of the WFG Act should give due regard to this connection to maximise delivery and avoid duplication. It is essential that future legislation and governance structures in Wales address the main drivers of biodiversity loss—such as unsustainable consumption, production, and inequalities—and that action is taken in line with the objectives of the WFG Act to ensure that environmental well-being improves alongside social, economic and cultural well-being.

**6.0 Existing Legislation** - The Planning (Wales) Act 2015 and the Environment (Wales) Act 2016 were designed to support the Well-being of Future Generations (Wales) Act 2015. Together, they establish a framework for considering how natural resource management contributes to well-being goals. However, Wales needs an integrated land use and marine framework, with consistent evidence and spatial data to fully realise these ambitions. A strategic, multifunctional approach, balancing different land and sea uses, would enable better use of natural resources and support well-being more effectively.

The Environment (Wales) Act's Area Statements and the WFG Act's Well-being Plans were intended to complement each other. In practice, implementation has suffered from misaligned processes and reporting cycles, leading to inconsistent and sometimes duplicated efforts. Area Statements would benefit from clearer policy direction which has been delayed in the current Senedd term. NRW are supportive of the recommendations made by the Climate Change Environment and Infrastructure Committee to ensure the Natural Resources Policy is up to date and capable of driving action for nature across the whole of government, with integrated policies that align with the Global Biodiversity Framework 2030 targets and wider goals.

Most biodiversity legislation pre-dates the nature emergency and works in isolation from the ecosystem approach enshrined in the Environment (Wales) Act. Given the nature emergency's threat to well-being goals, there is a need to strengthen the WFG Act's role in helping Wales to take a future proof view on building ecosystem resilience to deal with future threats and pressures to biodiversity and safeguards environmental well-being.

In terms of climate change, the Environment (Wales) Act 2016 sets decarbonisation targets, while the UK Climate Change Act 2008 provides the basis for reporting on climate risk and adaptation. Despite this, many public bodies lack clear mandates to take climate action, and most regulatory frameworks are not aligned with the climate emergency. This means that climate action often relies on policy rather than legislation, making collaboration challenging.

Before the WFG Act, the Climate Change Commission for Wales fostered collaboration on climate action and developed Wales' first Climate Change Strategy. It also provided a forum for collaboration and support for delivery of climate action with a wide range of organisations. These functions were not passed onto the Office of the Future Generations Commissioner via the WFG Act. Wales therefore currently lacks a single coordinating body for climate action, unlike other UK nations. This gap has led to fragmented efforts. Consideration should be given to creating a dedicated forum or expanding the role of the FGC Office to convene and coordinate climate action.

**National Indicators and Assessments of Environmental Well-being** -The SoNaRR report provides a valuable set of indicators to track progress towards sustainable natural resource management. Welsh Government should consider publishing complementary ecosystem service accounts aligned to the four long term aims of sustainable management. This could enhance local and national well-being assessments. Aligning new statutory biodiversity targets through the WFG Act would also help integrate ecosystem resilience into public sector delivery and reporting frameworks.

**6.1 Partnerships** - NRW is a statutory member of all 13 Public Services Boards (PSBs). The organisational landscape in Wales is complex and PSBs often struggle to operate in partnership whilst managing reduced capacity to deliver existing services. Practitioners often highlight that the lack of dedicated funding within these partnerships limits their ability to drive meaningful transformation in public sector services. NRW is not a member of other, better-resourced regional partnerships such as the Regional Partnership Boards (RPBs) and Corporate Joint Committees (CJCs). Considerations relating to Environmental Well-being are not always at the forefront of these other more well-resourced public sector partnerships. To strengthen environmental accountability and well-being integration across all partnerships, amendments to legislation should consider enabling PSBs to act as commissioners of well-being services from other public sector partnerships. This could include giving PSBs powers and duties to influence the budget and delivery of these more established partnerships, ensuring that spending is better aligned with local well-being needs.

NRW has worked closely with all PSB partners to improve understanding of how current and future climate risks within each locality will impact the well-being of both current and future generations. Since the latest well-being plans were published, all 13 PSBs have committed to undertaking more detailed local Climate Change Risk Assessments, with some using guidance produced by NRW in collaboration with Public Health Wales and the Welsh Government. The Public Health Wales Health Impact Assessment (HIA) on climate change (published July 2023) identified that disadvantaged communities are more vulnerable to climate-related risks, including flooding, heatwaves, and poor housing conditions in Wales. These communities often lack the resources and capacity to adapt, exacerbating existing inequalities. This underscores the need for targeted interventions to address the compounded vulnerabilities faced by these communities in the context of climate change.

PSB governance arrangements provide a valuable collaborative and statutory framework that could be instrumental in supporting collective action on climate impacts. However, at present, they are not being utilised to their full potential in this regard.

## 5.0 Whether the review and reporting requirements under the Act are being met;

**5.1** We are not currently aware of any specific review or reporting requirements under the WFG Act that are not being met. However, the Committee may wish to consider whether these requirements sufficiently align with the overall objectives of the Act. For example, Public Services Boards (PSBs) are mandated to publish well-being assessments and plans according to prescribed timelines, and the Future Generations Commissioner is required to provide advice and guidance on setting well-being objectives three times over this period. Currently there is no legislative requirement for the Commissioner to track progress on the delivery of these objectives by PSBs. Enhancing this aspect could strengthen oversight and support more effective achievement of the Act's goals.

## 6.0 The effectiveness of guidance made under the Act;

### 6.1 New Statutory Guidance:

#### 6.1.1 Land management options for well-being:

Section 2.0 above, highlights the challenge of managing land and sea for multiple benefits and deciding which mix of uses best supports the well-being goals. The Well-being of Future Generations (WFG) Act requires public bodies to consider all seven well-being goals but offers no clear method for considering the choices which decision makers need to take. While the Natural Resources Policy provides strategic direction, assessing how different land and sea uses contribute to well-being remains difficult.

While Welsh Government policy favours a more holistic assessment of well-being benefits, beyond purely quantitative methods like natural capital accounting, no alternative framework for evaluating the impact of different choices has been established.

Given that the drafting of the Environment Act 2016 was informed by New Zealand's Resource Management Act, Wales could learn from New Zealand's Living Standards Framework. This explicitly recognises the impact of different choices across domains (health, environment, housing) and uses multi-criteria analysis to evaluate spending impacts. Adopting similar guidance would help Welsh decision-makers better weigh land and sea use options against broader well-being outcomes.

#### 6.1.2 Legislative Overlaps:

Area Statements, Well-being Plans and Local Green Infrastructure Assessments all involve community priority-setting, but clearer timelines, processes, and coordination are needed to avoid duplication and support effective local implementation.

The new Environment (Principles, Governance and Biodiversity Targets) (Wales) Bill will establish statutory biodiversity targets and a Wales biodiversity framework. Embedding the UK's GBF and forthcoming Wales National Strategy and Biodiversity Action Plan into WFG Act guidance would further strengthen delivery mechanisms.

#### 6.1.3 Existing Statutory Guidance (SF3):

Beyond sectoral decarbonisation efforts, there is a need to better integrate area-based actions—via Area Statements and Public Services Boards (PSB) Well-being Plans and Reports—for coordinated action and reporting. Integration is critical to achieving the Welsh Government's commitment to a just transition.

Practitioners also seek clearer, consistent definitions of environmental well-being at the local level, supported by detailed, common data sets aligned with National Indicators and Environmental Well-being Assessments.

## 7.0 How far the Act has been legally binding and enforceable;

**7.1** The Well-being of Future Generations (Wales) Act does not include legal enforcement powers and NRW has no experience of using the Act in an enforcement capacity. Fundamentally, the Act is designed to promote collaboration and partnership working, which does not align easily with an enforcement mandate. From NRW's experience, balancing enforcement with collaborative roles can be challenging, as the two approaches can sometimes be in tension. Moreover, introducing enforceable measures may risk undermining collaborative initiatives and encourage short-term models of delivery, which contradicts the Act's aim of fostering long-term cultural change. The Act is intended to progress at a pace shaped by civil society, supporting sustained and meaningful transformation rather than immediate compliance.

## 8.0 Conclusion

**8.1** NRW is pleased to have contributed to the Equality and Social Justice Committee's review of the Well-being of Future Generations (Wales) Act. We recognise the role this inquiry plays in strengthening the integration of environmental well-being and sustainable management of nature within public sector decision-making across Wales. There is an inextricable link between sustainable natural resource management and environmental well-being. Sustainable management serves as a fundamental driver for maximising the Act's contribution to the well-being of both current and future generations. We hope this evidence supports the committee in identifying ways to enhance the WFG Act's impact

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

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

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

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Submitted to the Equality and  
Social Justice Committee

Public Health Wales

May 2025

## **Contents**

1. Introduction.....	3
2. Public Health Wales .....	3
3. Case Studies.....	3
4. Committee areas of focus .....	5
5. Summary messages.....	8

## 1. Introduction

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

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

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

## 2. Public Health Wales

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

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

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

## 3. Our case studies

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

### 3.1 Long-term thinking

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

organisational well-being objectives. These are as follows:

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

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

### **3.2 Prevention**

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

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

### **3.3 Integration**

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

### 3.4 Collaboration

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

### 3.5 Involvement

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

## 4. Committee areas of focus

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

#### **4.4 The effectiveness of guidance made under the Act**

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

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

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

#### **4.5 How far the Act has been legally binding and enforceable**

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

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

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

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

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

## 5. Summary messages

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

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

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

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Senedd Cymru | Welsh Parliament

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

Ymateb gan: Trafnidiaeth Cymru | Evidence from: Transport For Wales

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Jenny Rathbone MS

Chair of Equality and Social Justice Committee

Senedd

Cardiff Bay

Cardiff

CF99 1SN

06 January 2025

Dear Jenny Rathbone MS,

### **FUTURE GENERATIONS WELLBEING ACT**

On behalf of Transport for Wales, as its Chief Transport Planning and Development Officer, please find below some evidence to support the Equality and Social Justice Committee's inquiry on post-legislative scrutiny of the Well-being of Future Generations (Wales) Act 2015. I hope that this letter also helps inform our oral evidence session on Monday, 7 July 2025.

Earlier this year, TfW published its well-being objectives and a well-being statement as part of our commitment to the Well-being of Future Generations Act (WFG): Well-being goals | Transport for Wales. Despite only becoming a recognised public body last year, we have been embedding the Act through our everyday processes, operations, people, and culture long before our formalisation as a named body.

We have a dedicated internal team who govern the application of our well-being objectives across the organisation and provide support to colleagues to implement the principles and ways of working. We view the WFG Act as feeding into all our roles and responsibilities at TfW, and we must collectively consider the long-term



impact of our decisions and work better with people, our communities, and each other. Our approach to sustainable development is key to our work, so we are eager to support the Committee's post-legislative scrutiny.

At TfW, we believe the WFG Act has played a crucial role in embedding sustainable thinking into the operations of public bodies across Wales. The Act encourages long-term decision-making that considers social, economic, environmental, and cultural well-being, which we are incorporating into our strategies.

We have found the Future Generations Commissioner and team to be entirely supportive in our development of our strategies. In addition, we have found that the Commissioner's reports have provided us with useful information from its comprehensive reviews and overviews of progress. They provide important context and set out the Commissioner's ambitions and expectations.

In addition to such reports, we believe that establishing clearer evaluation criteria would enhance accountability of those within the scope of the Act and ensure that we are all effectively measuring our contribution to long-term well-being. Such criteria would be especially useful for organisations such as TfW, where the breadth of our activities mean that we are developing and fostering many partnerships supporting many different aspects of sustainable transport.

Furthermore, to better support the alignment of how different organisations are applying the Sustainable Development Principles, there would be benefit in strengthening common accountability mechanisms. For example, by establishing clear and measurable common standards, we would be able to effectively benchmark for performance and create certainty that we are implementing the principles of the Act effectively.

The guidance provided under the Act has significantly helped TfW understand our obligations. It has also supported the integration of well-being objectives into corporate policies, leading to positive changes in governance and strategy development. Despite this, there are still some challenges in interpreting and applying the guidance. We believe the provision of tailored sector-specific support and practical examples, could improve clarity and facilitate better implementation across all public sector bodies.

So, by addressing ambiguities in the legislative drafting of the Act, there would be increased clarification on expectations for public bodies. This would help to improve compliance by ensuring that all organisations have a clear understanding of their obligations and the standards they need to meet, especially when working collaboratively and in partnership with other organisations.

Although the WFG Act sets out legally binding duties for public bodies, we believe that the enforcement mechanisms largely depend on self-regulation and oversight by the Future Generations Commissioner. In practice, this means that while public bodies are required to follow the Act's principles, there are limited consequences for non-compliance. Strengthening enforcement frameworks by introducing clearer consequences for failing to meet well-being objectives could encourage greater



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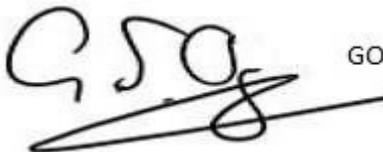
adherence and accountability.

Ultimately, many of the factors outlined in this letter feed into how the Act has represented value for money. We believe the Act encourages significant long-term benefits by encouraging public bodies to adopt preventative approaches rather than reactive policies. By focusing on sustainability and long-term well-being, the Act can help reduce costs associated with short-term, crisis-driven decision-making.

While the Act represents good value for money in principle, its effectiveness depends on how well it is implemented and monitored. Improved efficiency in implementation and clearer measurements of social, cultural, economic, and environmental impact could further demonstrate its value. By strengthening reporting and impact assessments, there will be a clearer picture of how effectively public bodies are meeting the Act's objectives and delivering tangible benefits to future generations.

I hope that this letter provides you with an initial understanding of TfW's perspective and experience on the effectiveness and impact of the Wellbeing of Future Generations (Wales) Act 2015, so far. I look forward to delving into the detail on these points in our oral evidence session in July. If you have any questions in the meantime, then please do not hesitate to get in touch.

Yours sincerely



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Geoff Ogden  
Chief Transport Planning and Development Officer

**Senedd Cymru**

**Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol**

**Ymchwiliad:** Deddf Llesiant Cenedlaethau'r Dyfodol (Cymru) 2015

**Ymateb gan:** Cyngor Gweithredu Gwirfoddol Cymru

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**Welsh Parliament**

**Equality and Social Justice Committee**

**Inquiry:** Well-being of Future Generations (Wales) Act 2015

**Evidence from:** Wales Council for Voluntary Action





# Well-being of Future Generations Act: Post- legislative scrutiny

## A RESPONSE FROM WCVA

- 1) Wales Council for Voluntary Action (WCVA) is the national membership organisation for the voluntary sector in Wales. Our purpose is to enable voluntary organisations to make a bigger difference together.
- 2) We thank the Committee for the opportunity to respond to this consultation on post-legislative scrutiny of the Well-being of Future Generations Act.

## INTRODUCTION

- 3) From the work of unpaid carers, through sports clubs, social prescribers, community centres and mental health groups, to advocacy organisations the voluntary sector and volunteers in Wales play a crucial role in Wales' well-being.
- 4) Therefore, for the Future Generations Act's Well-being Goals to be realised, it is vital the voluntary sector is at the centre of all.

conversations and decisions regarding the Act. It must be at the table for early and continuous dialogue on national policy-building and with public bodies about services that deliver the Act's goals. WCVA champions the Act but regrets it hasn't delivered transformational change in its first decade.

- 5) Carrying on with no substantial changes risks the Act failing in its objectives. Consideration must also be given to better enforcement to ensure the Act is properly implemented and achieving its Goals.
- 6) WCVA's engagement shows the voluntary sector feels it is still not on an equal footing with statutory bodies in discussions about the implementation of the Act. This is despite our sector's unique position which allows us to be more nimble and better able to engage with communities and individuals than public bodies. Failure to trust and value the voluntary sector means we struggle to amplify the voices of those at the grassroots level. In turn, communities who would benefit the most from realisation of the Goals of the Act lack input into decisions made in regards to its implementation. This erodes trust and undermines the intentions of the Act.
- 7) The voluntary sector has a strong relationship with the Office of the Future Generations Commissioner through WCVA's facilitation. Since the Act's launch, voluntary organisations have been eager to work with statutory partners to help achieve the Well-being Goals. We feel there is a need for systematic reform, including appropriate funding, to further this objective. We are keen to work with Welsh Government to shape its responses to the recommendations in the [Future Generations Report 2025](#).

## SUMMARY OF RECOMMENDATIONS

- 8) A summary of our recommendations relating to the Act follows.  
More detail is offered further on in this response.

### Effectiveness of the Act

- A pivot towards preventative work is crucial in the aim of creating A Healthier Wales, as well as reducing pressure on acute services. It must be prioritised. However, the voluntary sector will require sustainable and consistent resourcing for it to play its full part in the preventative agenda.
- There is a clear need to provide a more prescriptive framework for public bodies to contribute towards A Wales of Cohesive Communities. A co-produced communities policy would be the essential first step.
- As per the recommendation of the recent report from the Future Generations Commissioner, all public bodies should put organisational volunteering strategies in place.
- While the current milestone for volunteering under the Act has been reached, efforts must now focus on maintaining and exceeding this milestone. Full implementation of the New Approach to Volunteering in Wales will be essential to supporting this goal.

## Clearer guidance

- There should be clear guidance on how money earmarked for prevention is spent to ensure it is in keeping with the Goals of the Act.
- Public bodies should receive guidance to adhere to the [Code of Practice for Funding the Third Sector](#) to ensure voluntary sector partners can play their part in helping them deliver on the Goals of the Act.
- When the Act is successful and National Milestones are achieved, guidance should be issued on how to maintain the Milestones.

## Strengthening, enforcement and implementation

- WCVA is broadly supportive of the 11 recommendations put forward by the Future Generations Commissioner in the [Future Generations Report 2025](#).
- The Act should be reformed to grant the Commissioner greater powers. Consideration should be given to including tools for enforcement, incentives for compliance, and clearer guidance on implementation. To that end, WCVA suggests reviewing the powers of other Commissioners in Wales to better understand how they have been applied and, in turn, whether such powers have had a positive impact.

- There is a need for greater and more formal scrutiny of partnership forums, such as PSBs and RPBs, in Wales to ensure they are working effectively. This can ensure the ambitions of the Act are delivered , and that all partners are contributing to the process on an equal footing.
- Expanding the powers of the Future Generations Commissioner to have a greater oversight of how public bodies conduct public engagements in relation to the Act would help build public trust.

## A HEALTHIER WALES

- 9) Pivoting towards preventative health and care services is vital. As the recent report from the Auditor General noted: *‘The health system in particular has some way to go in applying future generations thinking across its planning and delivery. Accelerating progress under the Act starts with prioritising prevention. Without a more systematic shift towards prevention, budgets will be exhausted, and outcomes will likely be worse.’* [We strongly support this statement. Prevention creates healthier communities, helps people live longer and healthier lives, and reduces pressure on statutory services long-term.](#) However, the voluntary sector requires sustainable long-term resourcing for it to fully play its part in the prevention agenda.
- 10) Welsh Government should ensure voluntary sector involvement with the implementation of recommendation 19 of the Commissioner’s report:

‘Public bodies and PSBs should work together, along with the private and voluntary sectors, to implement the social model of health, placemaking and the Marmot principles to improve action on the wider determinants and reduce inequalities in their area’.

- 11) We welcome that Welsh Government has already committed to [‘making Wales a Marmot nation’](#) however, the voluntary sector must be engaged on how these principles are implemented for the best chance of success.
- 12) Implementation of the Marmot principles will help communities and public bodies become more aware of the external factors which influence a person’s health. This will lead to greater equity in health and care access and more consistent person-centred delivery, as required by the Social Services and Well-being (Wales) Act.
- 13) The voluntary sector has been at the forefront of community development for many years. It has an independent and unique role to play in supporting people and communities to thrive. Social prescribing has become more prominent across Wales. We believe it will play an important role in the implementation of the Marmot principles. However, as awareness of social prescribing grows, so does demand. The voluntary organisations accepting referrals often struggle with capacity and resource. Community and grassroots organisations need consistent and reliable funding to ensure the services they provide are stable and resilient.
- 14) We ask the Welsh Government to communicate to local authorities the importance of community involvement in the success of the Act,

stressing the need for genuine co-production (not just consultation) in the development of services. Co-production of services can help shift the power dynamic in favour of communities and create citizen-friendly, equitable services, as per the Marmot Principles.

- 15) The Future Generations Commissioner has spoken about aligning the Well-being Indicators of public bodies better with the Act. This would help create a more cohesive application of the Act, so would be welcomed.

## **A WALES OF COHESIVE COMMUNITIES**

- 16) We were pleased to see that the National Milestone to increase the percentage of people who volunteer by 10% has been reached. This is a clear example of where the Act has been successfully implemented. We cannot assume that the current level of volunteering will be maintained into 2050. Efforts must now be focused on maintaining and expanding the number of people volunteering in Wales. Guidance should be issued to ensure that public bodies are aware of the need to maintain goals once they are achieved.

- 17) Evidence from the [National Survey for Wales](#) shows that there are particular groups, such as younger people and disabled people, who are less likely to be volunteers. Future efforts should focus on the full implementation of the [New Approach To Volunteering In Wales](#), which would make volunteering accessible to underrepresented groups and ensure we maintain or even exceed the 2050 target.

- 18) A lack of trust within communities has played a role in undermining the successful implementation of the Act. We support the call by the Future Generations Commission to do more to improve trust in public bodies.
- 19) We believe that the voluntary sector can play a crucial role in building trust by bridging the gap between citizens and decision-makers. Being closer to the ground and embedded in communities puts the voluntary sector in a unique position to help build this trust. However, public bodies often misunderstand what the voluntary sector does in this space.
- 20) Sector partners expressed frustration over approaches to community engagement and how they felt this undermined the implementation of the Act, a representative from a voluntary sector infrastructure body told us the voluntary sector often struggles to amplify the citizen voice due to insufficient buy-in from decision-makers in public bodies. She shared that, in her experience, public bodies have been 'disrespecting community input' and were a great distance from co-producing outcomes.
- 21) Failure to properly consult with communities can undermine trust in decision makers. This lack of trust provides space in which divisive actors are able to spread misinformation, reducing cohesion and creating volatile situations. This makes communities less cohesive and equal, undermining the Goals of the Act.

- 22) Those who deliver services and engage with citizens should always adhere to the [National Principles for Public Engagement](#), as endorsed by Welsh Government. There is insufficient evidence that the Principles are widely adhered to.
- 23) There is scope to expand the powers of the Future Generations Commissioner to have greater oversight of how public bodies conduct public engagements in relation to the Act. This will strengthen the implementation of the Act and support public bodies in meeting the Act's Goals.
- 24) There is a clear need to provide a more prescriptive framework for public bodies to contribute towards A Wales of Cohesive Communities. We believe a co-produced communities policy is the first step.

## **COLLABORATION AND INVOLVEMENT**

- 25) Collaboration is one of the Five Ways of Working outlined under the Act and is essential for the implementation and realisation of its Goals. We are concerned about the inconsistency in engagement with the voluntary sector. Voluntary organisations enjoy strong working links with public bodies in some parts of Wales, but this is not the case everywhere. We fear this is undermining the implementation of the Act. For the Act to be a success, more needs to be done to foster consistent partnership working across Wales. Reform to the powers of the Commissioner and the Act in this area should focus on the sharing of best practice, strengthening the role

of the voluntary sector, and ensuring consistent buy-in from all partners to the ambitions of the Act.

26) We are also told that in some forums, such as Regional Partnership Boards (RPBs) and Public Services Boards (PSBs), partner organisations were not fully committed to the collaborative process that is expected by the Act. Jess Bickerton, CEO of the Pembrokeshire Association of Voluntary Services (PAVS), reflected that some public bodies attending PSB meetings do not fully engage in the discussions within the PSB. [She pointed to the annual report of the Pembrokeshire PSB, which highlighted these concerns](#). The failure of some partners to contribute in forums such as PSBs can be a barrier to the successful implementation of the Act. This may reflect a lack of understanding of what is required under the Act by public bodies.

27) There is scope to look at where the Act is working more effectively and share best practice across Wales. There is a need for greater, formal scrutiny of partnership forums in Wales to ensure they are working effectively. This will help strengthen the enforcement of the Act. In turn, the ambitions of the Act will be understood and all partners should be contributing to the process on an equal footing.

## **FINANCE AND STABILITY**

28) As noted in [our response](#) to the 2020 consultation on barriers to successful implementation of the Act, we advocate for the development of funding streams dedicated to specific Well-being Goals (selected with consultation and engagement). We believe this would provide a focal point for partners to work towards. It would

also act as a catalyst for developing more formal partnerships across sectors to realise those Goals.

29) Sector partners told us about the impact of short-term funding on the ability to meet the Goals of the Act. Jess Bickerton, CEO of PAVS, highlighted how short-term funding had undermined the potential long-term preventive impact of several pieces of work. She stated that *'there is no scope to either continue or replicate the work'*. The short-term nature of many funding streams often prevents service providers from making decisions now which are designed to produce benefits in the longer term. This is the antithesis of the Goals of the Act and plays a major role in undermining its successful implementation.

30) When public bodies and other funders consider the resourcing of the voluntary sector, they must adhere to the recently updated [Code of Practice for Funding the Third Sector](#) to help ensure these services are truly sustainable. Short-term funding arrangements create instability for voluntary organisations, their staff and their volunteers, contributing to staff leaving their roles and services being forced to close. Sticking to the Code of Practice can help prevent this.

31) Challenges have also been cited around the funding of prevention-focused activities and how this is not in-keeping with the principles of the Act. Heidi Bennet, CEO of BAVO (Bridgend Association of Voluntary Organisations), pointed to issues she had encountered with ring-fenced prevention-based funding: *'20% of the RIF is intended to be ringfenced for voluntary sector providers. However,*

*there is a concern that ringfenced amounts are sometimes interpreted as a maximum rather than a minimum level of funding.'* She went on to add that it was not always clear how effectively ring-fenced funding was used for preventive activities. It is for these reasons that while we are supportive of the Future Generations Commissioners' recommendation for ring-fenced preventive funding, it must come with clear guidelines and oversight to ensure the funding has the appropriate preventive impact.

## **A MORE EQUAL WALES**

- 32) There are currently no links between the LGBTQ+ Action Plan and the Future Generations Act, which can only be detrimental to several Well-being Goals, including, but not limited to, A Healthier Wales, A Wales of Cohesive Communities and A More Equal Wales. The connections between these two pieces of work must more tangible to ensure that the LGBTQ+ Action Plan can, as it states, *'support all LGBTQ+ people in Wales to live their fullest life: to be healthy, happy and feel safe'*. Some work to update the Action Plan and reform the Act in this area would be prudent.
- 33) However, we are pleased that the Mental Health Strategy makes direct links to the Future Generations Act, including noting which performance measures in the Strategy are also the Future Generations Act's National Indicators.
- 34) We are concerned to see that the levels of loneliness in Wales remain high. We feel particular attention must be paid to the finding

that someone who is [Black, Asian, or part of a Minority Ethnic group is twice as likely to have experienced loneliness as someone who is White](#). This undermines both the ambition for A Healthier Wales, A More Equal Wales and A Wales of Cohesive Communities.

35) Engagement with the sector shows it feels there is a lack of accountability in relation to the Act. There are currently no consequences for bodies that do not take the needs of future generations into account during their decision-making. As mentioned in a previous paragraph, consideration should be given to enabling the Commissioner enforcement powers, in consultation with bodies captured under the Act.

36) There are several areas in which the Act's guidance could be strengthened to ensure greater clarity of purpose:

- There needs to be clear guidance about how it links to other areas of policy and legislation – e.g. the health and care work undertaken by Regional Partnership Boards (RPBs).
- There is a clear framework around the Seven Well-being Goals, but these do not seem to be incorporated into wider planning effectively. Further guidance on implementation of the framework may prove useful to service providers.
- The guidance should include information on how public bodies can make communities more aware of the Act, and how public bodies can be challenged to adhere to it.

## CONCLUSION

- 37) In sum, WCVA remains strongly supportive of the Act, its ambition and its potential to positively influence outcomes for future generations across a wide range of indicators.
- 38) We recognise, however, that the Act has not delivered transformational change on the scale originally intended
- 39) To capture that potential – and in recognising some of the fundamental challenges in its first 10-years – there is a need to strengthen elements of the Act through consideration of a range expanded powers, enforcement and meaningful implementation; a review of the powers of other Commissioners would be useful in this respect to understand how they have been applied and their impact
- 40) Without strategic reform, the Act risks further challenges in the perception of both its effectiveness and relevance in public policy-making
- 41) Notwithstanding the constructive challenge and areas for consideration cited in this response, WCVA and voluntary sector bodies across Wales remain committed to working in partnership with the Future Generations Commissioner to enable the Act to reach its full potential

42) WCVA would welcome an opportunity to discuss these matters further with Members of the Senedd or officials on request.

*David Cook*

*WCVA Health and Social Care Project Officer*



*Shaun Bendle*

*WCVA Policy and Insights Officer*



*June 2025*



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

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Senedd Cymru | Welsh Parliament

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

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

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

Submitted by: Co-production Network for Wales

Contact: [REDACTED]

### About us

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

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

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

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

### **Observable changes within PSBs:**

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

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

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

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

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

**Structure and culture of PSBs:**

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

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

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

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

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

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

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

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

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

#### **Recommended actions:**

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

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

#### **Current practice within PSBs:**

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

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

#### **Recommendations:**

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

### 4. The effectiveness of guidance made under the Act.

#### **Current guidance for PSBs:**

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

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

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

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

### **Recommendations:**

The guidance needs to be revised, simplified and enabling:

- **Provide more flexible, example-led guidance**, including practical case studies and links to external tools (such as our range of resources on co-production for PSB<sup>3</sup>), to help translate the principles of the Act into action across diverse local contexts.
- **Empower PSBs to define their own success criteria** within the framework of the Act, enabling them to tailor their approaches to local priorities while remaining aligned with the overarching goals of sustainable development and well-being.

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

### **Accountability and scrutiny of PSBs:**

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

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

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

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

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

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

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

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

#### **Recommendations:**

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

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

**Concerns with assessing value for money through PSBs:**

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

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

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

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

**Recommendations:**

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

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

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

# Agenda Item 6.1

Jane Hutt 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/317/25

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

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

Cc Jenny Rathbone MS, Chair of the Equality and Social Justice Committee.

30 June 2025

Dear Mike,

## **Inter-Institutional Relations Agreement: Safety, Security and Migration Interministerial Group**

I am writing in accordance with the Inter-Institutional Relations Agreement, to report on the fourth meeting of the Safety, Security and Migration Interministerial Group (IMG), held on 21 May 2025.

The Rt Hon Lord Hanson of Flint, Home Office Lords Minister, chaired the meeting. Also in attendance was the Scottish Government's Minister for Equalities, Kaukab Stewart, Northern Ireland's Executive Deputy First Minister, Emma Little-Pengelly, and Northern Ireland's Executive Office Junior Minister, Aisling Reilly.

The meeting allowed all four governments to present their priorities on migration, safety, and security, and prompted discussions on how priorities can be progressed collaboratively at a Senior Official level.

The discussion generally centred on regular and irregular migration, with a focus given to the Immigration White Paper, published on 12 May 2025.

Additionally, there was a discussion on Asylum and Resettlement Accommodation including the asylum accommodation pilots.

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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.

The next meeting is due to take place in October 2025 and I will inform you once a date has been finalised.

The communique from both this most recent meeting and the meeting held in January are due to be published imminently. Once both have been published on gov.uk and gov.wales I will ensure my officials share the links with the Committee.

I am copying this letter to Jenny Rathbone MS, Chair of the Equality 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 line above the first few letters.

**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 6.2

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/314/25

Jenny Rathbone MS  
Chair  
Equality & Social Justice Committee

30 June 2025

Dear Jenny,

I refer to our recent response to your report "*Turning up the heat before 2160: time to pick up the pace on tackling fuel poverty*".

Recommendation 1 of the report called for publishing a revised Tackling Fuel Poverty Plan by the end of June 2025 which includes priority actions for the next two years. I am pleased to inform you that an update has now been published, [Tackling fuel poverty: priority actions update](#).

I will continue to provide updates as we make further progress on your recommendations.

Yours sincerely,

**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

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[@gov.wales](https://twitter.com/Correspondence.Jane.Hutt)

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.

# Agenda Item 6.3



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Colm Gildernew MLA  
Chairperson of the Committee for  
Communities

1 July 2025

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

Collette Stevenson MSP, Convener,  
Social Justice and Social Security  
Committee, Scottish Parliament

Dear Colm, Jenny, and Collette

Thank you for your letter raising concerns about the Pathways to Work: Reforming Benefits and Support to Get Britain Working Green Paper. The Secretary of State has asked that I reply on her behalf, as the lead minister for this policy.

Firstly, I want to emphasise how critically important it is to me to hear from disabled people, people with health conditions and those that support them. This is why, as you mention, we have held 11 face-to-face consultation events across England, Wales and Scotland, as well as supporting an event in Northern Ireland as part of the consultation. In addition, we have held 8 virtual events to allow maximum participation allowing those with accessibility issues and others to join from anywhere and have their voice heard. We have also had an online survey open throughout the consultation period. This has been accessible to all, at any time that suits. We have received a substantial number of responses in this manner. All input, face to face, virtual or on the survey will be carefully reviewed as part of the consultation process.

We understand that for some individuals, particularly those who have specific access needs, travel and planning for attendance can take significant effort. That is why we worked to maintain clear ticketing and safety procedures to minimise disruption and ensure fair access. We have also offered

reimbursement for reasonable travel costs to help people to these events and ensure they are listened to.

Our conversations with disabled people and people with health conditions, as well as experts, have already shaped and informed this Green Paper and we are committed to continuing this dialogue and drawing on a wide range of insights and experiences to get these reforms right.

That is why we continue to facilitate ways to meaningfully involve disabled people. Throughout the PIP assessment review, we are working closely with disabled people and stakeholders to ensure that the voices of those who go through the PIP assessment, and those with expertise in the system are embedded in the review. We have committed to co-produce the review with disabled people, the organisations that represent them, clinicians, experts, MPs and other stakeholders, so a wide range of views and voices are heard. I recognise that PIP has been devolved in Scotland and replaced by Adult Disability payment – we will continue to engage closely with Scottish Government to consider interactions between the reserved and devolved systems.

We are also in the process of establishing Collaboration Committees to further develop the reforms set out in the Green Paper. These will bring together groups of disabled people and other experts for specific work areas to collaborate and provide discussion, challenge, and recommendations. The Equality Analysis and Impacts for the Spring Statement changes announced on 18 March 2025 were published on 26 March 2025. The purpose of this analysis was to understand the overall impact of the measures where they are the responsibility of the UK Government (Great Britain for Universal Credit and England and Wales for PIP). The Equality Analysis is undertaken to understand the impact on policies of the whole package on people with protected characteristics, which does not include region or country breakdown.

However, there have been a number of data tables which were released in the Green Paper evidence pack published in full on 2 May that do break down data geographically and we are transparent in how these are set out.

Finally, I know that many people are concerned about the changes announced in the Green Paper. I would like to reassure you, and those that you represent, that changes are not happening immediately. The changes to the UC rates and PIP eligibility will be implemented from 2026, subject to parliamentary approval. Our reforms will ensure the most vulnerable and severely disabled people are protected, so they can live with dignity and security, while supporting those who can work to do so.

That is why we will protect existing claims as we bring forward the changes set out in the UC and PIP Bill. As the Secretary of State set out in her Oral Statement, no one who already has a PIP award when the new 4-point

minimum comes into force will lose out as a result of this change. For existing claimants of the health element of Universal Credit, we are also protecting the combined rate of the Universal Credit standard allowance and LCWRA in real terms. This protection also extends to new claimants who meet the Severe Conditions Criteria or where Special Rules for End of Life apply. Once again, I would like to thank you for taking the time to write to me and I would like to reassure you that we will continue to engage at both Ministerial and official level with devolved administrations as policy develops. I look forward to continuing to work together to support our shared goals.

With all best wishes,

A handwritten signature in black ink, appearing to read 'Stephen Timms', with a horizontal line above the name.

**Rt Hon Sir Stephen Timms MP**  
**Minister of State for Social Security and Disability**



Northern Ireland  
Assembly  
Committee for Communities

Room 430  
Parliament Buildings  
Belfast  
BT4 3XX

Our ref: CC/25/219

The Rt Hon Liz Kendall MP  
Secretary of State  
Department for Work and Pensions  
Caxton House  
Tothill Street  
London  
SW1H 9NA

25 June 2025

Dear Secretary of State

The Northern Ireland Assembly's Committee for Communities, the Scottish Parliament's Social Justice and Social Security Committee and the Equality and Social Justice Committee at Senedd Cymru have agreed to write jointly to you regarding changes to the incapacity and disability benefits system and the associated Pathways to Work Green Paper.

Set against an economic backdrop that is already extremely challenging for disabled people and/or people with health conditions, the anticipated changes have led to significant concerns. Those affected and other stakeholders in each of our jurisdictions fear that the challenges faced entering or returning to the workplace will only worsen in the coming months and years. For many, the benefits they receive are not symptomatic of a 'broken' system but make a significant contribution to their health and well-being and enable them to actively participate in the workplace.

The Committees are agreed that inadequate consultation and engagement by the UK Government with stakeholders and the devolved institutions has contributed to this sense of concern. Limited in-person consultation at just nine events, and only in major cities, is also restricting further the opportunity to hear from the many people who fear their ability to enter or return to the workplace will be adversely affected by the UK Government's approach to reform.

In addition, the lack of robust data and jurisdiction-specific impact assessments presents significant challenges for our three committees to effectively scrutinise potential impacts. As the elected members who make up the three committees, we are well placed to assess demographic and historical contexts and to ensure dialogue is constructive and reform is meaningful and positive. However, we remain constrained by the lack of quality information.

Our committees fully support the stated ambition that ‘no one should be consigned to a life on benefits just because they have a health condition or a disability, especially when they’re able to and want to work with the right support in place’. However, in order to contribute meaningfully to the reform process, committees and citizens must be fully informed and offered every opportunity for meaningful engagement.

The Assembly’s Committee for Communities, the Scottish Parliament’s Social Justice and Social Security Committee and the Equality and Social Justice Committee of Senedd Cymru have considered and approved the text of this letter.

Yours sincerely



**Colm Gildernew MLA**

Chairperson of the Committee for Communities

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

Collette Stevenson MSP, Convener, Social Justice and Social Security  
Committee, Scottish Parliament