# Agenda - Equality, Local Government and **Communities Committee**

Meeting Venue: For further information contact:

Committee Room 3 – Senedd Naomi Stocks

Meeting date: 15 November 2017 Committee Clerk

0300 200 6565 Meeting time: 10.15

SeneddCommunities@assembly.wales

Pre-meeting (10:15-10:30)

- 1 Introductions, apologies, substitutions and declarations of interest
- Scrutiny of the Welsh Government draft budget 2018-19: 2 evidence session 2

(10:30-11:30)(Pages 1 - 29)

Alun Davies AM, Cabinet Secretary for Local Government and Public Services Reg Mitchell-Kilpatrick, Director, Local Government, Welsh Government

3 Scrutiny of the Welsh Government draft budget 2018–19: evidence session 3

(11:30-12:30)(Pages 30 - 49)

Alun Davies, Cabinet Secretary for Local Government and Public Services Julie James, Leader of the House and Chief Whip

Rebecca Evans, Minister for Housing and Regeneration

Reg Mitchell-Kilpatrick, Director, Local Government, Welsh Government

Jo-Anne Daniels, Director, Communities & Tackling Poverty, Welsh

Government

John Howells, Director of Housing and Regeneration, Welsh Government

4 Paper(s) to note



4.1 Letter from the Cabinet Secretary for Education to the Chair of the Children, Young People and Education Committee in relation to Communities First – lessons learnt

(Pages 50 - 51)

4.2 Response from Let Down in Wales to the Welsh Government's consultation on fees charged to tenants in the private rented sector

(Pages 52 - 66)

- 4.3 Letter from the Chair of the UK Joint Committee on Women to the Secretary of State for Exiting the European Union in relation to Human Rights in Wales

  (Pages 67 70)
- 5 Motion under Standing Order 17.42 (vi) to resolve to exclude the public from the remainder of the meeting
- 6 Scrutiny of the Welsh Government draft budget 2018-19: consideration of evidence received under items 2 and 3 (12:30-12:45)

# By virtue of paragraph(s) vi of Standing Order 17.42

# Agenda Item 2

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Y Pwyllgor Cydraddoldeb, Llywodraeth Leol a Chymunedau Equality, Local Government and Communities Committee ELGC(5)-32-17 Papur 1 / Paper 1

#### 1. Introduction

This paper provides evidence to the Committee regarding the Local Government portfolio and future programme budget proposals outlined within the draft budget laid on 24 October 2017.

The majority of the Local Government portfolio funding comprises the core unhypothecated funding for Local Authorities and Police and Crime Commissioners in Wales in accordance with the Local Government Finance Act 1988. Funding is also provided through this portfolio to inspectorate and regulation bodies to provide effective statutory oversight of public services in Wales.

For reference, Annex A provides a breakdown of the draft budget figures for Resource, Capital and AME for the LG MEG by Action and by Budget Expenditure Line (BEL).

## 2. Background

This budget includes spending plans for 2018-19, together with indicative revenue budgets for 2019-20 and indicative capital plans until 2020-21. The table below provides an overview of the Local Government MEG for Resource, Capital and Annually Managed Expenditure until 2019-20. The indicative capital allocation in 2020-21 is £143m.

Table 1: Budget for 2017-18, 2018-19 and 2019-20 showing changes

£'000	2017-18 First Supp Budget	2017-18 Baseline Adjustment	2017-18 Revised Baseline	Change	<b>2018-19</b> Draft Budget	Change	<b>2019-20</b> Draft Budget
Resource	3,298,256	6,000	3,304,256	37,465	3,341,721	-85,132	3,256,589
Capital	143,118	0	143,118	0	143,118	0	143,118
Total DEL	3,441,374	6,000	3,447,374	37,465	3,484,839	-85,132	3,399,707
Total AME	1,059,000	0	1,059,000	-7,000	1,052,000	26,000	1,078,000
Total Budget	4,500,374	6,000	4,506,374	30,465	4,536,839	-59,132	4,477,707

This is the second budget of this term of Government and the third year of the UK Government's current Spending Review settlement. Austerity continues to be a defining feature of public expenditure. This long period of sustained reductions has had an impact on all services, even those where we have been able to provide some protection. It means that as the Welsh Government and as the National Assembly for Wales we continue to face tough choices.

Also the possible implications of the UK's exit from the European Union creates further uncertainty across public services. This is particularly the case for local authorities where the EU is a key provider of funding for Local Authorities. The Welsh Government has established a specific team to co-ordinate European Transition issues. The team is working closely with Brussels and the relevant policy departments.

Analysis of the evidence on current trends and projections has informed the prioritisation of resources through the local government budget to ensure the funding is focussed on the areas most critical to delivering the needs of the population of Wales.

The Local Government MEG comprises total DEL and AME provision of £4.537bn in 2018-19, an increase of £30.5m compared to 2017-18.

Within this, there is a net increase of £37.5m to the Resource budget. This includes £91.7m of transfers to the general revenue settlement previously provided through specific Welsh Government grants via other MEGs. The transfer of specific grants provides local authorities with greater control over spending plans for a larger share of their spending and, in turn, offers the opportunity for savings in administration costs and scope for local authorities to engage their communities in the decisions about spending that affect them.

In providing local authorities with greater flexibility through transferring funding into the local government settlement, it is vital that there is ongoing engagement involving Welsh Ministers and local government lead portfolio holders to ensure that the agreed outcomes delivered through these elements of funding continue to be delivered.

The largest component of the Local Government MEG is the provision for the core unhypothecated funding of the 22 county and county borough councils. This is delivered as Aggregate External Finance (AEF). AEF is made up of revenue support grant (RSG) and redistributed non-domestic rates (NDR). Revenue support grant is included within the Resource DEL and non-domestic rates are classified as Resource AME. This funding combined with income raised locally through council tax supports the delivery of core local authority services. As the funding is unhypothecated, it is for each local authority to determine its spending priorities in line with local needs and priorities. In addition to core funding, local authorities are also funded through income from fees and charges, specific grants from central government and reserves.

Similar arrangements apply to the provision of Welsh Government funding to Police and Crime Commissioners in Wales through the Police Settlement. Although the largest element of the core funding for policing is provided by the Home Office. Details of the 2018-19 police settlement allocations are due to be published in conjunction with the Home Office in December.

Table 2 below shows that, on a like for like basis, AEF funding will reduce by £20m or 0.5% in 2018-19 compared with the current year and by £61m or 1.5% in the following year.

Table 2: Aggregate External Finance for Unitary Authorities (Excl top up funding)

	2017-18 (adjusted to include £91.7m transfers)	2018-19 Provisional	2019-20 Indicative	
Unitary Authorities	£'000	£'000	£'000	
RSG*	3,201,884	3,188,855	3,103,237	
NDR	1,006,050	999,400	1,024,100	
Total	4,207,934	4,188,255	4,127,337	

Note \* for the purposes of reconciling to Annex A, line above includes £600k for child burials which will be paid separately.

## 3. Key policies

### Welsh Government's priority areas for local government finance in 2018-19

The funding represents the best achievable settlement that continues to protect local government from significant cuts against a backdrop of reducing budgets from the UK Government. Within the settlement we are prioritising funding for essential public services such as education and social care. This means providing £62m through the school element of the settlement in 2018-19to ensure that we maintain the assumed Welsh Government share of core spending on schools at the level of 2017-18. In 2019-20 this rises to £108m, reflecting our commitment to continue to invest in education and to prioritise schools funding within a tighter overall settlement.

Prioritising £42m in 2018-19 for social care within the settlement means we will maintain the assumed Welsh Government share of core spending on social care at the level of 2017-18. In 2019-20 this will increase to £73m, reflecting, even within a tighter overall settlement, our recognition of the need to invest in social care.

The settlement also includes an additional sum of £6m each year to support delivery of local services to meet homelessness prevention duties, on top of the £6m built into the settlement in 2017-18.

#### **Local Government Settlement**

The local government settlement was published separately on 10 October through a written statement to the National Assembly for Wales. The statement set out the distribution of the local government settlement using the agreed funding formula. The distribution included an

additional £1.8m funded floor arrangement to ensure no authority faced a reduction of more than 1% compared with its current allocation on a like for like basis.

The settlement consultative process underpinning the production of the local government settlement is one of the most comprehensive anywhere in Welsh Government. This has involved engaging with local government through a range of mechanisms as we have developed the proposals for the 2018-19 settlement. These include discussions in the Local Government Partnership Council and its Finance Sub Group on the funding considerations and distributional issues.

More detailed discussion on the funding formula has taken place through the Distribution Sub Group which includes Welsh Government and local government officials. The Distribution Sub Group's report on the funding formula to be used to distribute the 2018-19 settlement was agreed by the Finance Sub Group at its meeting on 28 September.

As a major element of the police settlement is funded by the Home Office, details of the 2018-19 police settlement will be published as part of the England and Wales police settlement announcement in December 2017.

## Funding floor and top-ups

As mentioned above, in addition to the funding identified within the MEG for the local government settlement, £1.8m of additional funding is being provided to ensure that no authority sees a reduction of greater than 1.0% in cash terms compared to its 2017-18 settlement allocation and, where relevant, top-up funding.

Six authorities benefit from top-up funding in 2018-19: Powys, Merthyr Tydfil, Blaenau Gwent, Conwy, Caerphilly and Monmouthshire.

This top-up funding is fully funded by the Welsh Government and does not involve any redistribution of funding from other authorities.

#### **Council tax reduction schemes**

The Welsh Government will continue to protect vulnerable and low-income households in Wales by maintaining full entitlements under our Council Tax Reduction Scheme (CTRS) for 2018-19. To support this, we have maintained the £244m of funding for CTRS provided within Local Government Settlement.

The longer term arrangements for 2019-20 onwards will be determined as part of wider considerations about how to make council tax fairer.

# **Funding formula**

We work closely with local government in determining the distribution of the annual settlement. The Distribution Sub Group Report records the changes proposed to the funding formula in respect of 2018-19. This Report was approved by the Finance Sub Group on 28 September.

The 2018-19 settlement formula reflects only one significant formula change. This is the second and final element of the phasing in of changes to the personal social services element of the formula, to take account of the additional costs of delivering the service to more sparsely populated communities.

Otherwise the formula reflects the normal process of updating population and other data indicators. This ensures the formula remains relevant and timely.

The formula for distributing the police settlement is prepared on an England and Wales basis and is the responsibility of the Home Office.

# **Preventative spending**

Each local authority is an autonomous, democratically elected body which is accountable to its electorate for the decisions it makes. Authorities have a series of statutory duties and functions, and powers to provide a range of other functions and services. These duties, including preventative activities such as home care services to keep people out of hospital and homelessness prevention. These activities are funded through a range of sources including core settlement grant, council tax income and income from fees and charges. Within the settlement, we are prioritising funding for social care and increasing funding for homelessness prevention by £6m in 2018-19.

Each authority must ensure that it undertakes appropriate impact assessments of any policies it implements funded through the local government settlement.

The third sector's 2017 action plan with the Cabinet Secretary for Finance and Local Government sets out joint work by Welsh Government and the third sector to scope work to define preventative spend, using the early action task force methodology as a framework. • While defining expenditure in terms of preventative spend is challenging, understanding different typologies of spend can be helpful.

Conducting full and meaningful engagement on its budget will help to ensure impacts are fully considered. It is for local authorities to set their own spending priorities taking account of this alongside the other sources of funding available to them. Local authorities are required to prepare medium-term financial strategies to ensure they are setting budgets which are stable and sustainable for the medium term. Setting out the revenue allocations for the next two years and capital allocations for the next three years will support that process.

Each authority will make its own decisions based on local need and priorities and must assess the impact of its proposals and decisions on protected groups and in relation to its wider functions.

## Welsh Language standards

Each authority is responsible for ensuring it meets its statutory obligations and the needs of its communities in relation to the implementation of Welsh Language standards.

Local government has a crucial role to play in implementation of the Strategy – in particular in efforts to improve planning for Welsh-medium education to drive an increase in the percentage of learners receiving Welsh-medium education (from a baseline of 22% to 24% in 2021, 30% in 2031 and 40% by 2050).

Local authorities are also implementing strategies to promote the use of Welsh within their communities to contribute to the Cymraeg 2050 target of increasing daily use of Welsh.

## **Equality and sustainability impacts**

We have continued to develop our approach to embed the five ways of working in preparing the draft budget with the Future Generations Act shaping the overall approach.

The draft budget plans are based on a clear analysis of long-term factors that are shaping the demand for public services including local authority delivered services. The analysis made clear the need for the preventative approach to funding public service provision.

In setting a budget for the whole of the public sector we have been clear that better integration across public services will be central to more effective service provision, as will collaboration and the involvement of public service users. This is supported through prioritising funding for social services and the requirement to develop pooled budgets with Local Health Boards and the continued support for the Integrated Care Fund.

We have also continued to take an integrated approach to considering impacts on protected groups and support a focus on our shared national goals. An integrated approach to assessing impact is critical, not least because many of the issues around equality, poverty and children's rights are inter-related. Taking this approach helps us to better consider all the potential impacts of our decisions and be confident we can manage them when taken as a whole.

The Budget Advisory Group for Equality (BAGE), co-chaired by the Cabinet Secretary for Finance and Local Government and the Cabinet Secretary for Communities and Children, provides a valuable resource for ensuring that equality considerations is an active strand in all budget decisions.

Our integrated approach provides a more realistic assessment of the overall impact of spending decisions and recognises that there is not always a single answer that will manage the impact of a decision in all areas. This assessment of the impacts of our decisions is vital to ensure the promotion of equality of opportunity and the prevention of discrimination, and this has shaped our approach to the budget process.

In terms of sustainability, Public Service Boards (PSBs) have a key role to play. PSBs have made substantial progress towards meeting their obligations under the Well-Being of Future Generations Act, working in accordance with the sustainable development principle.

Through their Assessments, PSBs are aiming to understand the underlying causes of the problems faced by their communities and the people living in the area.

Moving forward, in developing Local Well-being Plans, PSBs are using the evidence in their Assessments of Local Well-being to inform interventions aimed at finding collective, preventative solutions to these issues. Notable early examples of preventative interventions relate to health inequalities (deprivation in specific areas of the community), community resilience in terms of an ageing population, and climate change at a local level.

We have also used an integrated cross-portfolio approach to allocating our capital budget and considering the expected impact to prioritise budget allocation. We work with local authorities to make the most efficient use of the resources available collectively to address the government-wide challenges and constraints, and identify opportunities for joining-up, for example, to deliver the 21<sup>st</sup> Century Schools programme.

Also the Cwm Taf Collaborative estate pilot has demonstrated there are clear opportunities for the public sector throughout Wales to make efficiencies through the better use of its land and building assets. This includes better property data capture and asset mapping, enabling improved knowledge of the collective public estate, which as well as potentially identifying opportunities for further efficiencies will also highlight opportunities to integrate and improve delivery of services.

# Local government reform

Recognising we are in an era of reducing budgets and greater service challenges means that the status quo is not sustainable. Identifying and pursuing with local government, new and different ways of working is at the heart of an extensive local government reform programme. A key element of the programme is our plans to provide authorities with the mechanisms to deliver systematic and mandatory regional working across the services. This, along with the greater freedoms, such as through making available to authorities the general power of competence, are essential for ensuring that local authorities continue to be financially sustainable and deliver effective and resilient services.

The provision of £5m in 2018-19, rising to £6m in 2019-20 has been made for activities associated with the transformation of local government and the implementation of legislation to support the reform and renewal of local authorities.

These plans include taking forward consideration of a series of proposals for reforms to the local government electoral system, to make it easier for people to vote and to extend the entitlement to vote. They also include the independent review of Community and Town councils in Wales.

#### **Inspectorate and Regulatory Bodies**

The local government portfolio includes funding for the Care and Social Services Inspectorate Wales, Healthcare Inspectorate Wales and Estyn. The 2018-19 and 2019-20 budgets for the inspectorates and regulatory bodies have been reduced by 2.3% in 2018-19 and 5.4% in 2019-20. This is consistent with the reduction to Welsh Government running costs. These bodies are already taking action to secure efficiencies and target their resources more effectively, to mitigate the impact of these budget reductions.

# Annex A

RESOURCE BUDGET									
Action	BEL Description		2017-18 Supplementary Budget June 2017	Baseline Adjustments	2017-18 Revised Baseline	2018-19 Changes	2018-19 New Plans Draft Budget	2019-20 Changes	2019-20 New Plans Draft Budget
	0830	Community Support Officers	16,787		16,787	-16,787	0		0
	0840	Local Govt General Revenue Funding (RSG & NDR)	3,110,168	26,000	3,136,168	52,687	3,188,855	-85,618	3,103,237
	0845	City & Growth Deals	20,000	-10,000	10,000		10,000		10,000
	0860	Police General Revenue Funding	85,750		85,750	2,550	88,300	1,200	89,500
Funding Support for Local Government	0875	Non-Domestic Rates Rates Relief	10,000	-10,000	0		0		0
	0885	Local Govt PFI Revenue Consequences	3,650		3,650	-261	3,389	-133	3,256
	0887	Transformation & Legislation	5,000		5,000		5,000	1,000	6,000
	0940	Non Domestic Rates Collection Costs	5,172		5,172		5,172		5,172
	1600	Emergency Financial Assistance Scheme	1		1		1		1
P	Total Fund	ding Support for Local Government	3,256,528	6,000	3,262,528	38,189	3,300,717	-83,551	3,217,166
Pac	1500	Valuation Office Agency Services	8,561		8,561		8,561		8,561
Valuation Services	1540	Valuation Tribunal for Wales	1,074		1,074	-35	1,039		1,039
Pa	1550	Local Taxation Research & Analysis	100		100		100		100
ge	Total Valu	Total Valuation Services		0	9,735	-35	9,700	0	9,700
	1440	Sponsorship of the Local Democracy and Boundary Commission for Wales	572		572		572		572
Building Local Democracy	1462	Expenditure to promote local democracy	126		126		126		126
	Total Build	Total Building Local Democracy		0	698	0	698	0	698
Local Government Improvement	1571 Improvement & Audit		460		460	-110	350		350
	Total Loca	al Government Improvement	460	0	460	-110	350	0	350
Academi Wales	7093	Academi Wales	1,109		1,109	84	1,193	-59	1,193
	Total Acad	demi Wales	1,109	0	1,109	84	1,193	-59	1,193
	1574	Community and Town Councils	144		144		144		144
Supporting Collaboration and Reform	1575	Public Services Boards	730		730		730		730
	Total Supp	porting Collaboration and Reform	874	0	874	0	874	0	874
Care and Social Services Inspectorate	6775	Care & Social Services Inspectorate	13,953		13,953	-321	13,632	-736	12,896
	Total Care	and Social Services Inspectorate	13,953	0	13,953	-321	13,632	-736	12,896
Healthcare Inspectorate Wales	6785	Healthcare Inspectorate Wales	3,586		3,586	-82	3,504	-189	3,315
	Total Heal	Total Healthcare Inspectorate Wales		0	3,586	-82	3,504	-189	3,315
Estyn	6280	Estyn-Programme Expenditure	11,313		11,313	-260	11,053	-597	10,456
	Total Esty	n	11,313	0	11,313	-260	11,053	-597	10,456
LOCAL GOVERNMENT - TOTAL RESOURCE E	DCAL GOVERNMENT - TOTAL RESOURCE BUDGET				3,304,256	37,465	3,341,721	-85,132	3,256,589

CAPITAL BUDGET													
Action		BEL Description	2017-18 Supplementary Budget June 2017	2018-19 Plans as per 2017-18 Final Budget	2018-19 Changes	2018-19 New Plans Draft Budget	2019-20 Plans as per 2017-18 Final Budget	2019-20 Changes	2019-20 New Plans Draft Budget	2020-21 Plans as per 2017-18 Final Budget	2018-19 Changes		
Local Government General Capital Funding	1675	Local Govt General Capital Funding	142,837	142,837		142,837	142,837		142,837	142,837		142,837	
	Total Loc	Total Local Government General Capital Funding		142,837	0	142,837	142,837	0	142,837	142,837		142,837	
Estyn	6280	6280 Estyn-Programme Expenditure		281		281	281		281	281		281	
	Total Estyn			281	0	281	281	0	281	281		281	
LOCAL GOVERNMENT - TOTAL CAPITAL BUDGET			143,118	143,118	0	143,118	143,118		143,118	143,118		143,118	

RESOURCE BUDGET - AME							
Action	Action BEL No. BEL Description			2017-18 Supplementary 2018-19 Budget Changes June 2017		2019-20 Changes	2019-20 New Plans Draft Budget
Funding Support for Local Government	0870	0870 Non-Domestic Rates Distributable Amount - AME		-7,000	1,052,000	26,000	1,078,000
П	Total Funding Support for Local Government			-7,000	1,052,000	26,000	1,078,000
LOCAL GOVERNMENT - TOTAL RESOURCE AME	LOCAL GOVERNMENT - TOTAL RESOURCE AME BUDGET			-7,000	1,052,000	26,000	1,078,000
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# By virtue of paragraph(s) vi of Standing Order 17.42

# Agenda Item 3

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# Agerida Witterns AMA 1 Ysgrifennydd y Cabinet dros Addysg Cabinet Secretary for Education



Ein cyf / Our ref: MA(P)/KW/3712/17

Lynne Neagle AM Chair Children, Young People and Education Committee National Assembly for Wales Ty Hywel Cardiff Bay CF99 1NA

Y Pwyllgor Cydraddoldeb, Llywodraeth Leol a Chymunedau Equality, Local Government and Communities Committee ELGC(5)-32-17 Papur 2 / Paper 2 23<sup>rd</sup> October 2017

Dear Lynne,

Thank you for your letter of 28 September following the Children, Young People and Education Committee's consideration of my letter of 24 July with respect to community focused schools.

You requested clarification of the following areas which I will address in turn:

• Whether Circular 34/03 remains operational and if so, what assessment has been made of the extent to which our delivery partners are following the guidance?

Circular 34/03 is still relevant and will be used when we take forward the commitments outlined in Prosperity for All to establish community learning centres and to ensure that schools take on a more wide-ranging role as community hubs.

The guidance will be a useful point of reference for headteachers, governing bodies and the wider community.

Whether the definition of community focused schools is still current

This definition is still appropriate. Community focused schools will form a critical part of community learning centres. These new models will not just be about buildings but about service provision delivered from those buildings; for example, providing extended services with childcare, parenting support, family learning and community access to facilities built around the school day.

Bae Caerdydd • Cardiff Bay Caerdydd • Cardiff CF99 1NA 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.

It is important that schools connect with the community that surrounds them and that the school team of the headteacher, teaching staff and governing body play their part in enabling joined up work to move forward.

 The inclusion of specific criteria within the conditions for 21<sup>st</sup> Century Schools funding and Estyn's inspection framework.

Investment in our school and college infrastructure through the 21<sup>st</sup> Century Schools and Education Programme will be one of the levers to enable our plans for community hubs and learning centres to progress. We will draw upon all our budgets across education, in particular 21<sup>st</sup> Century Schools, to take forward this agenda.

Appropriate measures will be added to the Estyn inspection framework where necessary.

A copy of this letter will be sent to the Chair of the Equalities, Local Government and Communities Committee.

Yours sincerely

Kirsty Williams AM/AC

Ysgrifennydd y Cabinet dros Addysg

**Cabinet Secretary for Education** 

Agendall tenarad 2deb, Llywodraeth Leol a Chymunedau Equality, Local Government and Communities Committee ELGC(5)-32-17 Papur 3 / Paper 3

#### Introduction

Let Down Wales has been campaigning since 2013 for Wales to take a lead on reforming the private rented sector. The licensing of landlords under the Housing Act made a positive first step, but the Renting Homes Act did little to improve renters' rights and we have not seen much action on improving conditions in the private rented sector (PRS) since.

In 2016, our manifesto for the Assembly elections called for five proposals:

- A ban on letting agency fees
- · Higher quality standards for PRS housing
- Either a housing ombudsman or an expansion of the Residential Property Tribunal, to make mediation and dispute services available to both landlords and renters
- Rent control measures, to ensure rent cannot rise above inflation
- Support for a Tenants Union

We warmly welcome the commitment from the Welsh Government to ban letting agency fees and would like to facilitate this in any way we can. Likewise, the forthcoming Fitness for Human Habitation standards will, hopefully, set a higher standard for renters' homes (as social housing tenants can expect from the Welsh Housing Quality Standard).

For more information on our campaign, see:

• Website: https://letdown.wales/

• Twitter: <a href="https://twitter.com/letdownwales">https://twitter.com/letdownwales</a>

General questions

1. Who do you represent?

Let Down in Wales is a campaign to improve the rights of renters and the quality of their homes. We represent tenants in the private rented sector. We have run an online survey of the course of the consultation and gathered answers from a sample of 30 private renters' to the tenants' section of questions. We describe PRS tenants as 'renters' through most of the consultation, as it is a term that people more easily identify with.

2. Do you agree that Welsh Government should legislate to prevent agents and landlords from charging fees, other than rent in advance and a refundable deposit, to tenants when entering into a new, or renewing an existing tenancy?

Yes. In no other business are costs added on like this at the point of purchase, or even six months after your purchase. Landlords and letting agents, in particular, are running a business and therefore the costs of the business should be borne by the one who owns it and is profiting from it. Let Down has been calling for a letting agent fee ban since 2013 and included it in our 2016 Assembly manifesto<sup>1</sup>.

Rent and deposits are financial safeguards which, whilst often too high, we are not against in principle (although we would like to see deposits made transferrable between contracts). But any additional costs of reference checks, inventory fees or renewal fees are not appropriate. They take advantage of renters' lack of choice and the lack of available housing in the market. Letting agents charge fees because they can and renters pay them because they have no other choice.

Renters in Wales are made up of 29% living alone; 25% cohabiting couples with no children and 30% with children under 18. Renting is increasing the only option for families and the age demographic is increasing. Shelter

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<sup>&</sup>lt;sup>1</sup> Let Down Manifesto, 2015. 'A 2016 Manifesto for the Let Down renters of Wales'. https://letdownincardiff.files.wordpress.com/2015/08/let-down-manifesto-2016.pdf

Cymru's survey<sup>2</sup> of private renters found that "the figures shatter the stereotype of private tenants as being primarily young and child-free". Half of renters are over 35 and 29% are over 45. 15% are over 55, which shows that more vulnerable older people need to be taken care of in this sector. Due to the Housing (Wales) Act 2014, new homelessness duties mean that more vulnerable people are being referred by local authorities to the private sector.

Particularly considering the poverty often suffered by people who have to rent, it is important for their burden to be lessened and their debt and low income not exacerbated by renting costs. The Joseph Rowntree Foundation found in their evidence review<sup>3</sup> of housing and poverty that: "Low rents are important in reducing poverty. The private rented sector is paying an increasingly important role with 18% of private tenants in poverty before housing costs are taken into account and 38% in poverty after housing costs are paid."

Let Down are strongly in favour of a letting agency fee ban, both on principle and to urgently make the sector fit for purpose, particularly given the poverty and vulnerability of the renters in it.

- 3. If no, please explain why: n/a
- 4. Which fees, aside from rent in advance and refundable deposits, do you think an agent, landlord or third party should be permitted to charge? Why?

None. The tenant pays their monthly rent, which is inflated to bear the costs of the landlord and letting agent. No further fees should be necessary for

<sup>3</sup> The Joseph Rowntree Foundation, 2013. 'The Links between Housing & Poverty: An Evidence Review'. https://www.irf.org.uk/report/links-between-housing-and-poverty

<sup>&</sup>lt;sup>2</sup> Shelter Cymru, 2015. 'Fit to Rent: Today's Private Rented Sector in Wales'. <a href="https://sheltercymru.org.uk/wp-content/uploads/2015/02/Fit-to-rent-Todays-Private-Rented-Sector-in-Wales.pdf">https://sheltercymru.org.uk/wp-content/uploads/2015/02/Fit-to-rent-Todays-Private-Rented-Sector-in-Wales.pdf</a>

protocol that a landlord or agent considers necessary. Reference checks are usually vastly inflated, considering that an individual can usually access their credit report for free or for a very low cost – approximately £2 – online. The inventory check and staff time should be a business cost borne by the agent or landlord. In reality, they don't have to spare much cost during a tenancy, unless white goods break or damage is done to the property (which, if done by the renter, can be paid for through their deposit).

5. Some agents may charge a refundable holding deposit to take the property off the market whilst reference checks are undertaken. Do you think this is a fair charge? Please explain your answer:

No. A refundable deposit is also rare and isn't heard of much in renters' accounts to Let Down. A letting agent is more than capable of taking a property off a website (or marking it 'let agreed') whilst they conduct reference checks, without charging something extra.

6. Some agents may charge for in-tenancy property management actions that directly relate to an action or service carried out at the request of the tenant, or as a result of the tenant's actions (such as out-of-hours contact, or replacing lost keys). Do you feel that such charges are fair? Please explain your answer:

No, these do not seem fair but renters are usually willing to accept responsibility and costs if they have lost keys or need to get a locksmith out from their own fault. However, if for example they are locked out due to a faulty lock, the cost should be borne by the agent for not fixing the lock to begin with.

7. Agents may occasionally provide bespoke, non-standard services to tenants, for example, when arranging a property for someone currently living abroad who is relocating to Wales. Do you think there are parts of the market where a different approach to handling letting agents' fees may be allowable?

Different kinds of business models and services are welcome; certain renters, like international students, may welcome help with relocation, but

could also easily be taken advantage of i.e. by paying for a property they haven't seen in person. Some renters may still be willing to pay costs, if there are extra services of a high standard. However, Let Down would still advocate for a blanket ban on fees, as 'standard services' may quickly be relabelled 'extra services', in order to get around the ban.

Ultimately, if an agent or landlord wishes to provide extra services then this cost should be added to the rent. The rent is an all-inclusive cost to the renter which goes towards agents' profits, the landlord's mortgage and maintaining the quality of the property. If an 'extra service' is offered, the rent should be increased accordingly so the renter knows exactly what they're paying for.

8. What do you think the main impacts of a ban on charging fees to tenants might be? Please include any unintended consequences that you believe may arise:

Letting agents and landlords would be irritated but renters would have more rights, increased fairness and less debt created merely renting. It would be revolutionary for a lot of renters who have told us how difficult it is to have to find the money for fees, by taking out loans or borrowing off friends or family.

Agents are likely to use the well-worn argument of 'rents will increase if a fee ban is enacted'. Rents are set by the surrounding area, the income of the local renters' demographic and the quality of the property. Rents are set by supply and demand; if they did increase from this then so be it, but we very much doubt that administration costs would ever be the main factor in setting rent.

We would hope landlords would be in favour of this and that this may increase direct landlord - renter relationships, in avoiding agency costs for both of them (as landlords pay fees too). Our renters' reviews (submitted to

our website to review Welsh letting agents and landlords) overwhelming show that direct relationships are better for both parties, with the poorest service coming from agents.

#### Tenant questions

9. Have you ever been charged fees before entering into a tenancy agreement? If yes, please detail your most recent pre-tenancy charges, and if possible a breakdown of the charges, here:

Out of the 30 renters that responded to our survey, all but one had been charged fees up front, on top of their deposits and rent demanded in advance. These varied widely, with some paying as low as £90 and others going up to £400. The average between them was £228, but practice clearly depends on which agency you are with.

Whilst most were generally labelled as 'administration fees', some of the reasons listed where fees are broken down included:

- £40 £70 charged to renters required to use a guarantor (where the agency doesn't think you are solvent enough to be solely responsible for the contract)
- Credit checks between £50 £80
- Non-refundable holding fees, to take the property of the market whilst checks are done, between £75 - £100
- Pet deposits of around £100 £150, on top of the regular deposit
- Inventory check fees when moving out
- Renewal fees of £80 £100 for wanting to continue a contract (e.g. after already living there for say, 6-12 months). The agency charges a renewal fee for the renter to continue living there, often due to the 'lost revenue' from not charging new renters administration fees

One renter said they thought it was "normal" to be charged administration fees, on top of holding fees and then renewal fees later on in the contract. But they were surprised when they recently used an agency without fees. It's important to stress how normal yet still highly unfair renters find these fees.

Another renter said: "I felt particularly hard by having to pay these clearly unfair and ridiculous fees but I felt I had no choice as most one-bed properties [are] rented via letting agents and they always charge fees."

One highlights most of their charges are "rolled into one" so they had "no idea" what each charge was for separately, or between two or more tenants.

10. Have you ever been charged fees during a tenancy, or for renewal of a tenancy agreement? If yes, please detail the most recent amounts charged to you during the tenancy or renewal of the tenancy, and if possible, a breakdown of the amounts, here:

Again, most renters had been charged renewal fees. These were divided between two kinds:

- Fees for having a new renter added, mostly around £50
- Fees for re-signing the contract, between £40 and £150

Many also cited unfair repair costs, where agencies didn't respond to reports so felt they had to repair it themselves. For example, one said that "we reported [a problem with the washing machine] but the agency didn't send anyone to fix it, and when it finally broke completely they said that because we knew there was a problem and didn't sort it out, that we were liable for replacing it, so we had to buy a new washing machine ourselves".

One said that their agency charged them £50 every 6-12 months, so they "try to get a 12 month tenancy to avoid the fees and I want more security and longer tenancies".

Another stated that the letting agency "won't let me sign for more than a year so I cannot avoid these fees". One who is charged £100 for each renewal said "they will only let me sign for 6 or 12 months so I have to pay £100 a couple of times a year, just to keep my flat".

For those that hadn't been charged these particular fees, they cited reasons such as moving or being forced to move at the end of a contract so not

renewing. Another said they hadn't had this themselves, "but hear of it all the time; there should be no charge [...] nothing has changed, it's the letting agents making money for nothing".

11. Have you ever been charged fees after a tenancy has ended? If yes, please enter the most recent amounts charged to you after a tenancy has ended, and what the charges were for here:

About half of our respondents had been charged fees at the end of a tenancy, of between £50 - £300. These were mostly made up of 'cleaning fees' and 'repair fees'.

Renters particularly highlighted the spurious nature these fees were claimed for. One said they were charged "to replace a chair that was already broken when I moved in" and another said they were "charged £85 for carpet cleaning from my deposit, although I had already cleaned it". Another was charged £100 for cleaning, despite having hired professional cleaners to help on vacating the property.

One describes: "They took £120 for "cleaning fees" even though we had spent a very VERY long time cleaning the property to get our deposit back. We asked for a breakdown of the cleaning costs or receipts to show that the cleaning had actually cost the amount that they had taken off our deposits. They wouldn't provide us with receipts so we had no other choice but to let the money get taken off our deposits".

In Let Down's survey, we used the the consultation's questions verbatim, with some added explanation on what kinds of fees the questions are referring to. However, in this section, we also took the opportunity to ask renters about delays or problems with getting their deposit returned.

Deposits are usually 1–2 months' worth of rent, so are a significant sum which are withheld for a long time.

Most who responded on this one said they had to wait weeks or even 4–5 months to return their deposit, with one landlord having to force the agency to, despite already instructing them to return it. One had to go through deposit protection schemes to get it back, with the agency attempting to keep £630 of a £900 deposit.

One had money deducted from the deposit for "the garden having weeds in, despite the fact that it had been fully overgrown when we moved in. We didn't have any photographic proof so couldn't contest. They took roughly £100. We drove past the property after it had been re-let and they hadn't even done any maintenance on the garden, just taken the money".

# 12. Were any fees made clear to you before any agreement had taken place? If so, how?

Not as many renters could remember on this one; but of those that could, about a third were not told about fees upfront and the rest were either told after choosing a property or saw them mentioned in the tenancy agreement. Of the third not told, one said they were not made clear and they had threatened going to Trading Standards on one occasion.

However, even where fees are made clear, it's not as though renters feel they have much choice in them. One said the fees were explained verbally, "during quite a pressurised sales pitch where we 'had' to act fast to secure the property".

Another said: "Fees are often in the tenancy agreement but as you have no other agent to choose from and such a limited time scale to look for properties you feel forced to sign for them. The demand for rental properties is too high and it seems all agents now charge fees. I remember once when they were about £125 for referencing but now there's a charge for everything."

A few mentioned that they knew about upfront tenancy fees, but had no idea about the in-contract fees, renewal fees or outgoing fees. One said they were told, but it was not on the website. In terms of money being taken off the deposit, one said that money is taken when there is "anything beyond 'fair wear and tear' although when it comes to the end of the tenancy, they seem to change their minds on that one."

Another speculated: "Fees seemed to be made up on the spot. They were never on any website. It seemed like one big con to be honest but as a consumer I felt a complete lack of choice as there was no point taking my custom elsewhere as all letting agents charge such fees."

Some agencies seemed to be downright deceptive. One said an agent "attempted to charge over £100 [for admin fees] when receipt showed it cost £65".

13. Have tenancy fees ever affected: a. your ability to move to a new rented property? b. your decision to use an agent? c. your overall finances?

To this question, only 3 out of the 29 respondents said 'no'.

For the rest, the two most common issues cited were:

- Needing their family's help with the cost of both their rent and agency fees. One had to take out pay day loans to raise the money for fees.
- Not being able to move to a new home, despite being miserable in their current property, because they couldn't afford the fees. One felt "locked in due to the cost of moving". These renters cited loud noise, damp conditions and mice for wanting to move, but weren't able to afford it.

One said that they are "unable to move from private renting to [owning] because of finances and fees [being] too high". **The vulnerability of renters needs to be borne in mind**. A poignant comment from one renter was: "Yes. I

have had to take out pay day loans to raise deposits and fees. It's the main reason I'm in debt. I've tried to go private but most landlords now use agents. I have been homeless because of the cost of renting, not once but three times in my life and I have serious mental health issues which have been exacerbated by agents/landlords and their underhand methods of money extraction."

On a positive note, those that rented directly from a landlord (without an agency between them) had a much more positive experience. One said it was "easier and cheaper" with landlords being more responsive to any concerns or queries than agencies. Another said they tend to have "a trusted relationship" with a landlord rather than agent, and some had approached the landlord directly after one year of a contract to continuing renting with them directly.

One renter posited that whilst they tried to rent directly from private landlords, the relationship between landlord and renter is damaged to the point where agents are brought into mediate: "Problem is that greedy estate agents/landlords treat tenants with such contempt especially with regards maintenance issues that some tenants hit back by trashing flats. I have always been a model tenant and have never done this but I understand that this is the reason why landlords are wary of renting directly to tenant and bypassing estate agents."

Another commented on the letting agent's justification for high fees: "Yes, I viewed two prospective properties which were great, however, was told that agency fees would be over £500. I thought this was completely absurd, however the sales person attempted to justify it by stating that the agency would put together a legal contract as they referred to the tenancy agreement. Whilst I accept a tenancy is a legal document, it is important to note that a bus ticket is also a legal contract."

One respondent said that bad treatment from their last letting agency made them "more proactive as tenants to find problems early and pester our letting agency about it and post as much evidence as possible, as it is obvious that as tenants we're the only ones defending ourselves."

Letting agent / landlord questions

As a renters' campaign, these questions aren't applicable to us. However, we would advocate for reasonable fees to landlords as well. As the business owner, we'd expect them to pay something if delegating services or paying someone else to manage their business. But it should be reasonable and competitive, as any healthy market would conduct itself.

#### Further questions

- 28. We would like to know your views on the effects that banning fees charged to tenants would have on the Welsh language, specifically on:
  - i. opportunities for people to use Welsh and
  - ii. on treating the Welsh language no less favorably than English.

The three questions on the Welsh language were grouped together in one for our survey.

Most respondents could not see the link between letting agent fees and the Welsh language, with one saying that they could not see any specific effects on Welsh speakers and that "this is about fairness to all renters living in Wales".

There were two comments on Welsh services specifically:

- "As a Welsh speaker, I am happy to speak in either English or Welsh. I think producing documents in both Welsh and English is viable."
- "Agents could employ a dedicated member of Welsh speaking staff.
   They could provide information on their websites etc. in Welsh."

Another highlighting that they are relocating to Scotland said that they "have had a much better experience and have no fees to pay except the deposit."

Finally, on Welsh being used by agencies, one remarked: "Adding a second language would no doubt give them cause to ask for money under the guise of there being more paperwork." Given the array of fees detailed above, this wouldn't be surprising.

But on principle, Let Down of course supports services being available in the Welsh language, but agency fees cost money in any language.

29. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Renters raised a lot of issues in this section. We attempt to summarise them below.

- The high fees: This was the most common issue. Renters did not understand why fees are so high when their services is so poor. They also highlighted the renewal fees and a lack of any consistency as particularly unfair.
- Lack of mediation and reprisal services: A common theme was of not having anyone to turn to when problems arise. One said their MP did not help much and had to go to the Energy Ombudsman just to find out who their property's electric and gas providers were. Another didn't find Citizens Advice as providing any help with difficult letting agents. One suggests that there should "really be some kind of official body who can make sure [agents] provide a basic level of service such as handling maintenance issues and complaints." Let Down campaigns for a Housing Ombudsman (like there is in England) or a Housing Tribunal (like there is in Scotland) in order to fulfil this need in Wales.

- Taking advantage of those who cannot buy: Multiple renters referred to the inability to save for a deposit to buy a home, with one suggesting that "letting agents along with private owners are filling the housing gap that should be filled by government and are getting away with exorbitant fees." One highlighted that their generation being in their early 20s was forced to rent but being repeatedly "ripped off" made them lose complete faith in it. Let Down has found that renters aren't against renting per se, but are angry at the current conditions of the rental market. Home ownership is aspired to more so they can get away from renting than to own property themselves.
- Discrimination against tenants: Those with mental health issues or disabilities highlighted particularly bad services, with one being refused a tenancy as their partner had a disability and the letting agents "often refuse to let us view property [...] they say a better tenant will come along". Any advert marked with 'No DSS' or 'No pets' or 'No children' is displaying a form of discrimination, often simply against more working class people.
- Lack of information about processes: Tenants express annoyance at having no proof of the credit checks or why they are charging so much for a simple process, such as printing out a new tenancy with the year changed. One describes letting agents as a "cowboy industry, with little or no regulation and unfair fees are part of this." One renter suggested requiring agencies to provide receipts with a breakdown of all costs. This would be a much more transparent way of proving that fees taken from the renter are used as promised.

Several expressed hope that the Welsh Government and the National Assembly for Wales would make things better for their day to day lives and "ban these fees once and for all".

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please say.

Our response can be made public but we have not provided the individual survey responses as some wished to remain anonymous. In taking quotes, we have been sure not to identify individual circumstances unless it is a fee amount.

We gathered no information on names, ages, gender or any other demographic information. Let Down has found, through accepting letting agent reviews on our website, that many renters are fearful of retribution if seen criticising their letting agents and landlords.

The sample can be assumed to be representative of renters from Wales, although it was self-selecting as we targeted at people in Wales, of a 'rental demographic' through a social media advert.

We cannot help but point out that this consultation would have greatly benefited from a workshop or other outreach methods to find renters, rather than a voluntary campaigner paying money to advertise a Welsh Government consultation and spending time making it more simple to use by creating a SurveyMonkey page. There is a serious problem with renter engagement if the renters' responses to this are vastly outweighed by landlord and letting agent responses.

Y Pwyllgor Cydraddoldeb, Llywodraeth Leol a Chymunedau Equality, Local Government and Communities Committee ELGC(5)-32-17 Papur 4 / Paper 4

# Agenda Item 4.3



The Rt Hon David Davis MP
Secretary of State for Exiting the European Union
9 Downing Street
London SW1A 2AG

WEN Wales Anchor Court North Keen Road Cardiff CF24 5JW

24th October 2017

Dear Minister,

Re: Gender-blind negotiations surrounding the United Kingdom's withdrawal from the European Union.

We write in our capacity as members of the United Kingdom (UK) Joint Committee on Women, which is the UK's national co-ordination to the European Women's Lobby and as organisations engaged with advancing women's equality and rights. We write to identify our concerns that women and gender as a topic of concern are absent from the Brexit negotiations.

As you will know, equality policies are among the most developed areas of social policy in Europe, and equality is foundational to the European Union. Equal pay for equal work was one of the founding principles in 1957 and it was, and continues to be, embedded in EU Treaties and Directives. Over the last 50 years, EU laws have been underpinned by the principles of equality and non-discrimination, which have promoted and protected women's rights in several areas, including the rights of part-time workers, the rights of pregnant women, and protections for women and girls who experience violence.

As the UK moves forward with its withdrawal from the EU, we grow increasingly concerned about the absence of women's voices and what that means for the erosion of women's rights in the UK. While we were encouraged to learn of gender parity in the Department for Exiting the EU, we are concerned that the commitment to gender balance is not extended to the UK negotiating team. The UK negotiating team biographies, as published by your Department, include only one woman among its nine members. While women represent 51 percent of the population and 32 percent of the UK Parliament, women form only 11 percent of the UK's negotiating team.

In June 2017, Catherine West MP raised a question about the gender composition of the negotiating team. Steve Baker MP responded and noted that the first round of negotiations, held on 19 June 2017, included 12 members, two of whom were women. Mr. Baker further wrote that the Department for Exiting the European Union was "drawing together expertise from a wide range of departments where there is specific relevant knowledge". Given the over-

representation of men on negotiating teams, it would be helpful if your department could set out its plans to ensure that women's lived experience forms part of negotiations. The UK Government has demonstrated its commitment to delivering 'a deal that works in the best interests of all citizens', a commitment which resonates well with us. It is difficult to understand, however, how this can be achieved when the voices of half of the UK's population are not represented at the negotiating table.

We urge your department to draw on the expertise of statutory equality bodies and civil society. It is vital that the two UK equality bodies, the Equality and Human Rights Commission and Equality Commission Northern Ireland, are substantively engaged as the negotiations proceed. Women's organisations in all of four nations are keen to work with the UK Government to provide informed support to ensure women's rights are protected. In the absence of a gender balanced negotiating team, and without statutory or third sector equalities experts involved in the work of the Department for Exiting the EU, we remain unconvinced that the rights of women will be adequately protected following the UK withdrawal from the EU. It is our concern that the current structures for exiting the EU will leave women both simultaneously exposed and invisible.

Our concerns for women's equality are particularly relevant in Northern Ireland, where there is currently no Executive and women have no channels through which to engage with your Department. Women in Northern Ireland are likely to be disproportionately affected including in respect of life, work, trade and conflict resolution and around the border across the island of Ireland.

In February 2017, the Women and Equalities Committee published its report 'Ensuring strong equalities legislation after the EU exit'. Among its findings, the Committee noted that 'ensuring that equality protections are maintained is not simply a matter of transposing existing EU law'. Civil society organisations across the UK have supported these findings and have made representations urging the Government to be cognisant of them in planning and negotiating the exiting arrangements. Despite the Committee's findings, as well as support for the findings by civil society organisations, the European Union (Withdrawal) Bill proposes to end the supremacy of EU law and to convert EU law into UK domestic law.

For 50 years, the EU has promoted gender equality and non-discrimination in policy and practice, and has consistently reaffirmed a commitment to promote and respect women's rights. The absence of the EU legal framework, coupled by an unclear direction of the UK on its review of domestic legislation post-Brexit, puts the rights of women and girls in the UK in a precarious position. As it stands, the European Union (Withdrawal) Bill will do exactly what equality experts have warned would be detrimental to women's equality and rights in the UK. To protect and promote women's rights, we strongly urge the UK Government to build a gender-balanced negotiating team, reflective of the UK's population. We call on you to commit to women's equality and women's rights as priorities for the UK-EU negotiating agenda and for the future post-Brexit UK.

We look forward to your response.

Yours sincerely,

#### Carwen Howells

#### Carwen Howells, Chair, UK Joint Committee on Women

Barbara Cleary, Vice Chair, National Association of Women's Organisations

Catherine Fookes, Director, Women's Equality Network Wales

Emma Johnston, Board Member / European Representative, Northern Ireland Women's

European Platform - NIWEP

Emma Ritch, Executive Director, Engender

Jeanette Thornton, President, BPW Northern Ireland

Lynn Carvill, Chief Executive Officer, WOMEN'STEC

Anne McVicker, Director, Women's Resource & Development Agency - WRDA

Jan Melia, Chief Executive Officer, Women's Aid Federation Northern Ireland

Sandy Brindley, Chief Executive, Rape Crisis Scotland

Bill Scott, Director of Policy, Inclusion Scotland

Tressa Burke, Chief Executive, Glasgow Disability Alliance

Talat Yagoob, Chair, Women 50:50

Anna Ritchie Allan, Executive Director, Close the Gap

Ian Welsh OBE, Chief Executive, Health and Social Care Alliance Scotland (the ALLIANCE)

Marsha Scott, Chief Executive, Scottish Women's Aid

Evelyn Fraser, Development Manager, Scottish Women's Convention

Fergus McMillan, Chief Executive, LGBT Youth Scotland

Tim Hopkins, Director, Equality Network

Katy Mathieson, Co-ordinator, Scottish Women's Rights Centre

Jackie Jones, Chair, Wales Assembly of Women

Lesley Abdela MBE, Senior Partner, Shevolution

Ahlam Akram, Director, BASIRA

Tanya Barron, CEO, Plan International UK

Dr Juliet Colman, Director, SecurityWomen

Britt Gustawsson, Risk Manager, Zonta Club London II

Annette Lawson, Chair, The Judith Trust/NAWO Ambassador

Eleanor Lisney, Co Director, Sisters of Frida

Lynda Dearlove, Chief Executive Officer, Women @ the Well

Eleri Butler, CEO, Welsh Women's Aid

#### c.c.:

The Rt Hon Justine Greening MP, Secretary of State for Education, UK Government The Rt Hon James Brokenshire MP, Secretary of State for Northern Ireland, UK Government The Rt Hon David Mundell MP, Secretary of State for Scotland, UK Government The Rt Hon Alun Cairns MP, Secretary of State for Wales, UK Government Michael Russell MSP, Minister for UK Negotiations on Scotland's Place in Europe, Scottish Government Christina McKelvie MSP, Convener, Equality and Human Rights Committee, Scottish Parliament Joan McAlpine MSP, Convener, Culture, Tourism, Europe and External Relations Committee, Scottish Parliament

Carl Sargeant AM, Cabinet Secretary for Communities and Children, Welsh Government John Griffiths AM, Chair, Equality, Local Government and Communities Committee, Welsh Assembly David Rees AM, Chair, External Affairs and Additional Legislation Committee, Welsh Assembly The Rt Hon Maria Miller MP, Chair, Women and Equalities Committee, UK Parliament