

CCEI Scrutiny Recommendations 2023 – NRW’s response

Recommendation 1.

Natural Resources Wales should share with the Committee the detailed Service Level Agreements (SLAs) it has developed in collaboration with the Welsh Government as soon as possible. It should publish high-level summaries of the SLAs in the interests of openness and transparency.

Working with WG, our teams have prepared 10 service level documents relating to:

- Flood Risk Management
- NRW Estate (including the woodland estate)
- Pollution Incident Management
- Enforcement
- Water Quality
- Enabling tree planting
- Freshwater Monitoring
- Marine Monitoring
- Terrestrial Monitoring
- The Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021

These services are currently funded by a combination of funding streams (flood, non-flood, charges and commercial income) and account for 25% of non-flood Grant in Aid.

The documents follow a common template and describe the service, setting out the scope, objectives, exclusions and output and input metrics (£ and FTE – Full Time Equivalent) and then move on to describe three options:

- Current service (as reflected in the 2022/23 NRW Annual Business Plan)
- Reduced service
- Improved service

There are clear choices to be made and to aid this process, policy officials from NRW, working in collaboration with Welsh Government, have recommended one option which they believe represents their shared understanding of the service required to meet our current legislative requirements and duties as well as specific commitments in the Programme for Government and the Co-Operative Agreement with Plaid Cymru. When identifying these recommended service levels, officials focussed on the service levels and meeting our statutory requirements rather than on the specific financial costs or the potential benefits that could be realised through the invest to save proposals.

A table summarising the service level agreements is included with a slide pack that summarises for each service the different options and recommendations. These service level documents are not static and will be regularly reviewed based on feedback from stakeholders to ensure we meet evolving needs. Please accept our apologies that this attachment is currently in English only. The agreed service levels have informed our 2023/24 Business Plan.

Due to the complex nature of the exercise, we would warmly welcome an early opportunity

to discuss this with the Committee members and the Senedd Research team to help you understand the interdependencies, and answer any questions you may have.

Recommendation 2.

Natural Resources Wales and the Welsh Government should establish a monitoring and evaluation process for its SLAs. This process should include consultation with stakeholders and regular updates to the Committee on how the SLAs continue to reflect both parties' evolving needs and priorities.

Our monitoring and evaluation of the SLAs will draw on evidence and insight from our stakeholder and customer feedback channels including: our consultations, our complaints and commendations processes; our advocacy work with strategic stakeholders; and our broader engagement with the citizens of Wales through our national conversation 'Natur a Ni', to inform our discussions with Welsh Government on the current SLAs and any future agreements with them.

As part of our focus on improving our service to our customers, we have reviewed our Complaints Policy and Procedures - it is now quicker and easier for customers to provide feedback and we can effectively measure the implementation of service improvement recommendations.

In line with the Public Services Ombudsman for Wales (PSoW) we have streamlined our complaint process and reduced our SLA for Stage 1 complaints from 20 working days to 10 working days, focussing on the root cause of the complaint and resolving the issue at first point of contact. Formalised stage 2 complaints are more customer focussed, and we take a proportional approach, ensuring they are resolved effectively and quickly within 20 working days, and identifying mitigation measures to avoid repeat complaints. We are open and transparent in relation to complaint performance and provide quarterly service level information to the PSoW, which is published on their website.

During 2022/2023, 98% of Stage 1 and 90% of Stage 2 complaints were responded to within 20 working days, compared to 88% of Stage 1 and 11% of Stage 2 complaints during 2021/2022. We actively listen to our customers and seek feedback from peer organisations, to ensure we continue to respond to complaints effectively and learn lessons which help us improve our services as an organisation.

Using feedback and insight, we have improved our Access to Information processes and procedures to ensure customers and stakeholders receive timely, accurate and easy to read responses to their requests for information. We also publish information about the requests we receive on our website, to demonstrate openness and transparency. During 2022/2023, 92% of requests were responded to within 20 working days, compared to 76% in 2021/2022.

We continue to develop our ability to listen to customers by promoting Customer Journey Mapping as our continuous improvement approach to services. Colleagues from across the organisation have attended in-house introductory training and we continue to empower and enable a customer focus with our colleague practitioner network.

Recommendation 3.

Natural Resources Wales should provide regular updates on the measurable outcomes and milestones achieved under the Adfywio/Renewal programme and outline future targets.

Since the programme was established, we have provided annual updates on our Adfywio work as part of our written evidence ahead of our annual scrutiny sessions with the Committee.

The ambition of delivering financial and emissions savings will be realised over a number of years as this programme is introducing significant changes to the way we work, and will require significant upfront investment. We have to ensure we are horizon scanning best practice so that what we are investing in now is fit for purpose in the context of our wellbeing objectives and the broader nature and climate emergencies.

The performance of the programme is reported on a quarterly basis as part of our business plan performance management. These dashboards are available publicly as part of our published board papers on our website.

Recommendation 4.

Natural Resources Wales should collaborate with academic institutions and industry partners to develop targeted capacity- building and training initiatives, such as internships, apprenticeships, and specialised courses, to address the skills gap in critical areas. NRW should set a timeline for implementing these initiatives and consult with stakeholders to ensure their effectiveness in recruiting and retaining specialist staff.

NRW's approach to Placements is set out in our Placement Policy and Procedure. This is the Framework for the recruitment, co-ordination, support and implementation of all placements. As an organisation we are committed to helping to develop a skilled workforce for Wales. We believe that placements give people the opportunity to gain valuable skills and share experience and expertise whilst also making a significant contribution to the success of our business.

The Framework was developed with advice from trade unions, legal representatives drawing on comprehensive research into what other organisations offer. It currently consists of 7 strands split into Paid and Unpaid placements:

- **Apprenticeships (paid)** – A long-term placement of up to 100 weeks with specified study time (days or block release).
- **Paid Placements with External Funding (paid)** - Dependant on funding scheme criteria.
- **Higher Education Placement (paid)** – A long-term placement of up to 100 weeks.
- **Work Placement (unpaid)** – A short-term placement for and up to 6 weeks or 30 days
- **Research Placement (unpaid/contribution)** - A short-term placement for a up to 6 weeks or 30 days, or a long-term placement of 6 weeks or longer, up to 12 months.
- **Student Work Experience Placement (unpaid)** – A short-term placement for a up to 6 weeks or 30 days.

- **NRW Volunteer Placement (unpaid)** - Dependent on placement opportunity and work programme. Any opportunity longer than 12 months requires an annual review.

These opportunities combined with our education and learning programme (educator training, resources, setting support linked to Careers and the World of Work, links with Careers Wales and career advice) provide many opportunities for routes into employment to NRW and the wider sector.

To reduce risk and maximise opportunity, all placements offered by NRW are administered in line with a Placement Policy and Procedure. This is designed to comply with all relevant NRW policies and procedures, legal advice, governance and best practice. We also have a well-established, multi-disciplinary Placements steering group and a growing community of practice.

A number of principles underpin our approach to placements. All placements are advertised to ensure equal opportunities to all and placements do not replace paid staff nor are used to displace an existing paid post. Paid placements are remunerated in line with our commitments as a Real Living Wage employer.

A table of a selection of current and past opportunities under the various strands is provided in Appendix 1. This provides a snapshot, and more detail can be provided if required.

NRW recognises the vital role placements can play in helping to attract, develop and retain people with the right skills, capabilities, commitment and behaviours needed for the current and future organisational success. We also work with the wider environment sector to provide opportunities to secure a workforce equipped to tackle the climate and nature emergencies now and in the future.

A Service Design approach is currently being used to inform the development of a talent management framework of which Placements is a vital component. This project will be concluded in April 2024.

We have and continue to feed into the development, and realisation of, Curriculum for Wales. We are in regular contact with WJEC and Qualifications Wales and hope to sit on the Advisory Board for a number of subjects as part of the 14+ GCSE development (application pending) in order to influence subject content.

Recommendation 5.

Natural Resources Wales should provide the Committee with an update on the progress of its Strategic Review of Charging and the proposals for increases in charges/fees.

The review has been completed and revised charges approved by the Minister have come into force from 1st July. This includes new charges for applications for water quality, waste, water resources, industry regulation, species licensing and reservoir safety applications.

A 6% increase in subsistence has been approved from 1st April for water quality, water resources, COMAH, emissions trading, flood risk applications, non-nuclear radioactive substances, reservoir compliance and materials recycling facilities.

Recommendation 6.

Natural Resources Wales should include in its advice to the Minister information on the financial implications of its proposed changes to charges/fees on individual applicants.

This has already been sent to the Minister as part of our advice package when requesting ministerial approval.

Recommendation 7.

Natural Resources Wales should provide a summary report to the Committee on the main challenges in achieving good status for all water bodies by 2027 and outline its plans to overcome them. This Report should also include NRW's approach to ensuring the timely implementation and review of the River Basin Management Plans (RBMPs).

The latest River Basin Management Plans for the Western Wales and the Dee River Basin Districts and the Welsh part of the Cross border Severn River Basin district, and their summaries can be found on our website: [Natural Resources Wales / River basin management plans 2021-2027.](#)

Updated every six years, these set the direction for how we will manage, protect and improve our water environment in Wales. Our rivers, lakes, wetlands, ground waters, estuaries and coastal waters - including those in protected areas - all fall under these plans. Through this process we develop a detailed understanding about the state of our water environment, the pressures acting upon it and what measures are required to improve and protect it by using existing and new evidence.

The River Basin Management Plans detail the improvements which have been made over the last six-year cycle, and outlines the further improvements necessary to prevent further damage to our waters. We have identified ten Opportunity Catchments where we will focus staff resource across NRW's functions to support partners to deliver integrated catchment management solutions.

We believe that the detailed plans and summaries on our website should be sufficient to answer the Committee Member's questions, but if there are any outstanding queries, please do get in touch.

Recommendation 8.

Natural Resources Wales should regularly review the adequacy of staffing levels and resources for enforcing agricultural pollution regulations and Report on its findings. NRW should also strengthen collaboration with stakeholders, including farmers and agricultural organisations, to promote sustainable practices that minimise pollution.

The CoApr SLA includes a requirement for the submission of reports to WG on the progress of our compliance and enforcement, this will include assessment of delivery levels with staff funded by SLA. NRW has committed to update the membership of the Welsh Land Management Forum agricultural pollution sub-group. Collaboration with stakeholders, including farmers and agricultural organisations will form part of the newly recruited CoAPR Officers role.

Recommendation 9.

Natural Resources Wales should demonstrate progress in bringing unpermitted storm overflows within the regulatory regime and expedite the review of Storm Overflow Classification guidance. Additionally, NRW should continue working closely with water companies to improve infrastructure and reduce the frequency and impact of sewer overflows. NRW should report on progress six months after the publication of this Report.

Following our update to the Committee in December, we are due to release our Storm Overflow Classification guidance on permitting storm overflows in the coming weeks. This will set out our expectations for compliance, and will ensure we can progress the permitting requirements for both unpermitted and those overflows that are currently substandard and unsatisfactory.

We will ensure that the Committee receives a copy of this guidance when it becomes available.

Recommendation 10.

Natural Resources Wales should provide further details on the progress and effectiveness of the SAC rivers project and the national nutrient calculator. NRW should also engage with local communities and stakeholders to develop and implement catchment-scale solutions for nutrient management.

The First Minister's Action Plan 'Relieving Pressures on SAC River Catchments to Support Delivery of Affordable Housing' is a key enabler for this work. It includes a number of actions for NRW and other organisations.

In 2021 NRW established an internal SAC rivers project to provide strategic oversight and co-ordination across 6 workstreams. The workstreams include priorities in relation to our statutory duties as well as those NRW specific tasks included in the First Minister's Action Plan.

The Action Plan includes the development of an All-Wales Nutrient Calculator. NRW produced the specification for this work which has now been procured by Welsh Government. NRW sits on the steering group and will be involved in the testing of the calculator.

NRW is also committed to reviewing permits for water discharge permits of 20m³/day or more in SAC rivers.

NRW is a member of each of the Nutrient Management Boards, where stakeholders and communities will be involved in discussions particularly in relation to catchment scale nature-based solutions for nutrient management. NRW are also exploring the provision of a database, setting out projects in development or completed so that evidence is effectively shared, to draw out lessons learnt and understand the effectiveness of different approaches. NRW is also exploring the acceptability of citizen science data in decision making.

Progress reports are provided to the SAC river pollution Ministerial led group, as well as through the NRW Annual Business Plan Performance Report.

Recommendation 11.

Natural Resources Wales should continue its work with the Better River Quality Taskforce and keep the Committee updated about the progress of action plans.

NRW's Chair, Sir David Henshaw, continues to chair the Better River Quality Taskforce and provided an update to the Committee on progress against the recommendations set out at the Committee session in December 2022.

As mentioned previously, progress is being made against the NRW actions on the 5 action plans for storm overflows, with guidance due to be issued shortly.

Recommendation 12.

Natural Resources Wales should expedite the development and testing of criteria for inland bathing waters and provide a clear timeline for their implementation. NRW should also engage with local authorities and tourism organisations to promote the responsible use of inland waters for recreation.

Welsh Government's Programme for Government 2021-2026 makes a commitment to "Begin to designate Wales' inland waters for recreation, strengthening water quality monitoring". NRW are committed to supporting this ambition and welcome funding from WG to establish a project group and to scope a project plan for delivery.

The project is likely to include identifying freshwater sites used by the public for bathing and recreation; land ownership and access rights; infrastructure and signage needs and maintenance; health & safety and water quality.

NRW and Welsh Government are making progress developing pilot sites, which will allow for new landowners and local authorities to learn how to manage a bathing water during a season and allow for comms and customer engagement to be managed effectively. During the pilot, existing processes and support will be evaluated and recommendations will be provided at the end of the pilot season, for amendments and support.

Recreational access to inland water is part of NRW's continuing work to promote responsible recreation, in particular through the issuing of the Countryside Code and related Family of Codes in Wales. The Family of Code includes a 'waterside code' and codes for canoeing, angling and wild swimming. NRW has recently issued a Promotion Strategy and Action Plan to guide our promotion of the Countryside Code; the Plan includes a commitment to work closely with stakeholders, as well as working with Natural England to ensure the Code is promoted to Wales and England audiences. NRW also support the UK 'Check, Clean, Dry' initiative, aimed at preventing the spread of invasive non-native species (INNS).

Recommendation 13.

Natural Resources Wales should ensure that the delay in publishing the first Report on the National Strategy for Flood and Coastal Erosion Risk Management does not impact the planning and implementation of flood risk management initiatives. NRW should address any reasons for the delay in future reporting cycles to ensure timely information sharing with stakeholders and the public.

The Section 18 report is a report of progress against Welsh Government's National Flood and Coastal Erosion Risk Management Strategy, and so is a factual report on past performance. It does not impact the planning and production of flood risk management initiatives, and such initiatives draw on other information (e.g. flood risk maps), which are readily available. Flood risk plans and initiatives are described in other documents, such as Risk Management Authority Flood Risk Management Plans and Strategies, and production of these has not been hampered by this delay.

The delay was agreed by all parties, including Welsh Government and Welsh Local Government Association, and is a one-off. As stated by WG, a key factor was practical workforce pressure (on all parties), but also it will allow more time for a better product to be produced. The section 18 report is on schedule to be published in Autumn 2023.

It should be noted that whilst this is the first report on the second cycle (2020) National Strategy for FCERM, there have been 3 previous reports on the first cycle (2011) National FCERM strategy. These are available on NRW's website, as are NRW's flood risk management annual reports.

Recommendation 14.

Natural Resources Wales should provide updates on the progress and effectiveness of the action plan developed in collaboration with stakeholders for biodiversity conservation. NRW must continue to work closely with the Welsh Government to develop primary legislation, and a comprehensive framework of nature recovery targets for Wales and should regularly report to the Committee on its role in this regard.

The action plan from the Biodiversity Deep Dive is being developed for 'Team Wales' delivery. NRW is leading the delivery of some of the actions but not all of them. The Minister has agreed to provide 6 monthly updates on the action plan recommendations. The first six monthly update was published on 22 May and is available here - Biodiversity deep dive: progress update October 2022 to April 2023 | GOV.WALES.

NRW provided updates as part of this report and continue to attend and update on action delivery as part of the Ministerial led Core Deep Dive Groups meetings which are happening at 3 monthly intervals. NRW remain actively engaged with the Welsh Government policy leads in this area.

Appendix 1. NRW Placements

Placement strand	Past	Current	Future
Apprenticeships	<p>Long running scheme of Integrated workforce placements studying the Environment and Conservation Level 2 Framework</p> <p>Forestry programme studying the Trees and Timber Level 3 Framework</p>	<p>6 x Enforcement apprentices studying Environment and Conservation Level 3 Framework.</p>	<p>Integrated workforce x 12 studying the Environment and Conservation Level 2 Framework from September 2023 – funding dependant.</p> <p>Development of further programmes, funding dependant.</p>
Higher Education	<p>Annually offered Forest Operation placements for up to 5 sandwich students studying a degree in Forestry and Land management Natural Resources Wales / We're looking for our next Forestry students – could it be you?</p> <p>Marine Specialist Monitoring team placement opportunity Our Work Diving into marine conservation: on placement with #TeamNRW (sharepoint.com) offered for 18 months.</p> <p>Year 1 of 5 Flood and Water Management students placed throughout the Flood Risk Management portfolio</p>	<p>Annually offered Forest Operation placements for up to 5 sandwich students studying a degree in Forestry and Land management Natural Resources Wales / We're looking for our next Forestry students – could it be you?</p> <p>Marine Specialist Monitoring team placement opportunity Our Work Diving into marine conservation: on placement with #TeamNRW (sharepoint.com) offered for 18 months.</p> <p>Year 2 of 5 Flood and Water Management students placed throughout the Flood Risk Management portfolio</p>	<p>An area to which more parts of the business are looking. It supports the university whilst providing valuable staff resources to NRW.</p> <p>Forest Operations funded for up to 3 further years.</p> <p>We are in early talks with the University of South Wales about their Network 75 programme Network75 University of South Wales</p> <p>Potential of future employment with</p>

		12 Waste Regulatory Reform Programme placements across Wales recently recruited,	NRW for the Waster Regulatory placements
Paid placements with external funding	Kickstart - 50 roles offered and 24 filled, hosted across Wales and work area with a number securing permanent roles post scheme.		Actively engaging with a variety of schemes to ascertain if suitable.
Research	Ongoing research placements across the organisation.	Partnership with EPW. Training – epwales.org.uk £50K allocated to fund PhD placements during 22/23. 15+ opportunities across MSc and PhD and in a diverse range of topics e.g., Designs to support population health and well-being and Assessing Welsh Fishing activity	Continue to grow this area and strengthen partnerships with Universities across Wales and beyond. Considering: Academi Wales and their 'All Wales Public Service Graduate Program' Develop partnership with EPW around evidence needs and careers advice offer.
Student Work experience	Due to the pandemic interest in this strand had ceased.	Summer 2023 – 26 placements offered to learners aged 15 and over across Wales including fisheries, visitor centre, land management and hydrometry and telemetry	The summer 2023 placements scheme will be evaluated with a view to expanding the offer next year and beyond.
Work Experience	A number of placements offered to help those looking for a career change which has included ex-servicemen and the		An area which can be adapted and progressed as required.

	Welsh Governments Esgyn/Lift programme		
Volunteers	Ongoing boat, shore and diving support volunteer programme	<p>20 boat, shore and diving support volunteers based in South West Wales</p> <p>Gower Scheme – 12 volunteers working on general conservation land management</p> <p>Natural Resources Wales / NRW Gower Volunteer</p>	Lots of potential for more schemes across Wales. Early talks with Probation Service.