



Senedd Cymru | Welsh Parliament

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

Ymateb gan: Comisiynydd Cenedlaethau'r Dyfodol Cymru | Evidence from: Future Generations Commissioner for Wales

Senedd
Cardiff Bay
Cardiff
CF99 1SN

27th May 2025

Dear Jenny,

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

Thank you for the opportunity to contribute to the Equality and Social Justice Committee's post-legislative inquiry into the Well-being of Future Generations (Wales) Act. I welcome the Committee's proactive steps in undertaking this important work as we mark the tenth anniversary of this landmark legislation.

As you will be aware, I recently published my statutory [Future Generations Report 2025](#), which provides a comprehensive assessment of how Wales is performing to deliver on Wales's seven well-being goals. This report includes detailed analysis, case studies, and 50 recommendations aimed at improving implementation across Welsh Government and public bodies. I would encourage the Committee to reflect on the findings and recommendations of this report as part of its inquiry.

Importantly, the report includes a specific recommendation that a post-legislative review of the WFG Act should be undertaken by Welsh Government. The Auditor General makes the same recommendation in his recent report, ['No time to lose.'](#)

The Committee's inquiry is an important opportunity for us to collectively consider how we strengthen implementation of the WFG Act and deliver better outcomes for current and future generations.

To properly review the effectiveness of the WFG Act and to consider future legislative amendments, I encourage policymakers to involve the people of Wales, in keeping with the commitment made in 2014 through the national conversation 'The Wales We Want'.

In submitting this letter, I would like to draw the Committee's attention to the following key points for consideration:

1. **The WFG Act is delivering positive change** – The law is making an impact today and



for the long-term. Evidence shows that the WFG Act is guiding important decisions by public bodies and embedding sustainable development. The annual Well-being of Wales report shows the extent of progress towards the seven national well-being goals. There is positive change but there is much more to do. I have provided detailed evidence of the impact of the WFG Act later in this submission.

2. **People support the vision** – There is widespread commitment to the WFG Act amongst leaders and employees of public bodies. This support and pride in the Welsh approach to protecting the interest of future generations extends to voluntary organisations and businesses too. Where the public is aware of the law, people express support for its aims. The WFG Act was shaped by the national conversation in 2014, ‘The Wales We Want’. It is a people’s Act. We must continue to honour and deliver on the commitments we made to the people of Wales and to our future generations.
3. **We must accelerate progress**– While progress is being made, we are not on track to achieve our seven well-being goals. My Future Generations report 2025 identifies areas where implementation must be improved. However, as the Auditor General has said too, the WFG Act has increased in prominence. There is growing awareness and understanding of the WFG Act, and as time goes on, public bodies are getting better at implementing it. Nonetheless, more action is needed. This requires commitment and leadership from public bodies as well as the necessary skills and resources to turn intention into action.
4. **The approach is essential for Wales’s future** – All countries must prepare for the future. The WFG Act provides the framework we need in Wales to prepare for future challenges, such as the climate emergency and demographic shifts, as well as to harness future opportunities, such as green growth and artificial intelligence. It ensures we look ahead at future trends and take a more preventative approach, improving outcomes and delivering better value for money in the long run. If we did not have the framework of the WFG Act, we would need to replace it with something else.
5. **The law should be strengthened** – After ten years of learning, there are aspects of the law itself which could be strengthened. My views are set out in this submission. The inquiry presents an important opportunity to consider any changes collectively.
6. **Wales is a global leader** – Wales is a pioneer but not an outlier. The WFG Act remains a pioneering piece of legislation, inspiring similar approaches internationally. At a time of growing global momentum around intergenerational fairness and sustainability, Wales’ leadership offers soft power and international influence which we should continue to harness.

Committee Terms of Reference

In this section I respond to each of the areas outlined in the terms of reference and look



forward to providing further detail and evidence during the oral session in November.

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

How the Act is making an impact

There is much to recognise about the progress made and the impact delivered since the WFG Act came into force. The Act has:

- framed debate and helped get issues on the agenda, for example the idea of a [universal basic income](#), which led to a basic income pilot for care leavers;
- led to many commitments from government, for example the establishment of a [procurement centre of excellence](#) following my office's recommendation and most recently to changes in the format of the Rivers Summits so that they consider all Welsh rivers and all pollutants and have a greater focus on delivery;
- secured procedural change in how public bodies make decisions, for example see how Bannau Brycheiniog National Park developed its strategic plan [Y Bannau: The Future](#);
- informed policymaking, such as [Welsh Government's new Priorities for Culture](#);
- influenced practical behaviour change, for example the five ways of working are the behaviours the whole of the Welsh public sector are required to demonstrate and my office can now measure that change through the [Ways of Working Progress Checker](#).

Examples

There are lots of examples of the Act's impact, many of which are contained in my reports, most recently in the [Future Generations Report 2025](#). I have included some further examples below:

- **Ensuring a greater focus on prevention.** The Welsh Government's new Integrated Medium Term Plan Guidance for the health service now includes a strategic objective on prevention. Samia Edmonds MBE, Planning Director of the Healthcare Strategy and Planning Division in Welsh Government has said:

"The WFG Act remains key to informing and shaping the statutory NHS Wales Planning Framework...The Act is a priority feature of NHS planning, albeit we recognise that there is further progress to be made. As a result, there is now a much stronger focus on prevention and population health cross policy and through NHS planning. The encouragement, challenge and support of the FG office has helped us identify opportunities to work collectively. Prevention and population health is now integral to integrated medium term plans and is the mechanism to drive sustainable service solutions across Wales over time."

My office developed a definition for prevention with Welsh Government to inform budget strategy and decision-making processes, which are a fundamental part of driving change across public services in Wales.

- **A more sustainable transport system.** [The Llwybr Newydd Transport Strategy](#) is guided by the WFG Act. My team advised officials and convened stakeholders to advocate for a national strategy that increases public transport, walking and cycling. [Research](#) that my office produced in 2018 influenced the rejection of an M4 relief road, which would have burdened future generations with £1.4bn of debt and compromised space for nature and set out the alternative spending priorities. Budget allocations for public transport and active travel infrastructure have increased.
- **Fixing the food system.** The WFG Act is a catalyst for action to fix our food system for future generations. [Food Matters](#) is a short, simple overview of Welsh Government's food related policies and activities. It illustrates how food related policies are developed and delivered in response to the WFG Act as well as the Programme for Government. In my strategy [Cymru Can](#) and the Future Generations Report 2025, I set out the evidence to show that without improving access to healthy and sustainable diets, Wales cannot achieve the goals of the Act. The WFG Act and the work of my team are stimulating action across Wales. For example, Carmarthenshire Council has designed the first ever Public Services Board food strategy and twelve Welsh councils are now participating in the 'Welsh Veg in Schools' programme to supply free school meals with Welsh produce in line with their duties under the WFG Act.
- **Education with the future in mind.** The new national curriculum is shaped by the WFG Act. The [Curriculum for Wales](#) (CfW) implementation plan maps the long-term outcomes of CfW against the seven well-being goals. My team undertook research on [education](#) and on the [long-term skills gap](#). This formed the basis of advice to Welsh Government officials on the national curriculum being based around the WFG Act. My office has also:
 - advised Qualifications Wales on the reform of GCSEs and vocational qualifications to reflect the skills we need for a more prosperous, equal and resilient Wales;
 - collaborated with the WJEC to create a [qualification](#) on the WFG Act which is now being delivered across Wales;
 - advised officials on the national [Employability and Skills Plan](#) to reflect a well-being economy;
 - advocated for a National Nature Service being established.
- **Beyond the public sector:** The Act has impact beyond the public sector. It sets out a national mission which requires all organisations to get behind if we are to be successful. Many private and third sector organisations apply aspects of the legislation voluntarily, for business and other reasons. One of those organisations is the Principality.



Julie-Ann Haines, Chief Executive of Principality Building Society, said: *“The Well-being of Future Generations Act is hugely important – not just to Principality Building Society, but to the private sector as a whole, helping to guide and shape responsible business strategy. While Principality is not bound by the Act, we are compelled as a purpose led mutual in Wales to support its delivery and work collaboratively for the benefit of communities.*

As a mutual, we are committed to creating lasting impact that extends beyond our scale. Through our sponsorship of the Future Generations Leadership Academy, we support young leaders to better understand the Act and create action to tackle key social issues. Over the past two years, our colleagues have participated in the Academy, focussing on inclusion and financial education initiatives. We have also aligned our community funding approach with the principles of the Act – launching our Future Generations Fund in partnership with Community Foundation Wales. Since 2021, we have supported over 130 different groups, awarding over £1.5million in grants – with the selection criteria embracing the wellbeing goals of a prosperous, more equal Wales.”

The national indicators

The national indicators were put in place to measure progress towards the seven well-being goals. The [Well-being of Wales](#) Report tracks our collective progress towards the national well-being goals using [national indicators](#), providing insight into how effectively we are implementing the Act.

Some indicators have improved, such as the overall employment rate, participation in sport by adults, and police recorded hate crime dropped by 4% compared to the previous year. But some indicators have worsened, including life expectancy in Wales, reflecting rising poverty, inequality, and preventable illnesses.

The national milestones cover several of the national indicators at once. Some national milestones show progress, such as a 27% reduction in direct carbon emissions since the WFG Act was introduced in 2015 (data up to 2021) and the percentage of people volunteering. However, other milestones have remained stagnant or declined.

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

Improving the effectiveness of the WFG Act and its implementation is the core mission in my strategy, Cymru Can. Some of my comments below build on previous assessments my office and I have made to Welsh Government and Senedd Committees.

- **Leadership:** Where I see good implementation of the WFG Act, bold leadership in support of brave decisions is a strong and recurrent theme. But this is not happening across Cymru. Therefore, I believe there should be a greater focus on building the knowledge capacity of our public sector leaders and those with responsibility for the corporate areas of change, such as finance, assets and workforce planning. Academi Wales could play a bigger role in this regard.
- **More focus on outcomes:** The focus should be on delivery and outcomes, but the Act and statutory guidance emphasise governance and process (because it was thought they would lead to sustainable long-term decisions). In practice the focus has often been on process to the detriment of outcomes. The statutory guidance could be amended to redress the balance.
- **Resources:** As the Auditor General and I have reported several times, lack of resourcing (across the public sector and my office) is often cited as a reason why the WFG Act has not been implemented as fast as we would like and is one reason why it has not yet delivered the systems wide change it was created to deliver.
- **National indicators and milestones:** The national indicators and milestones are a key element of the WFG Act. They are the envy of many other countries. They help define what matters to us in Wales and how we implement the UN Sustainable Development Goals (SDGs) in Wales. A key issue is the lack of alignment between national goals, indicators and wellbeing objectives. There are still public bodies that do not integrate their well-being objectives, standing separately from organisational objectives, and not linked to our national goals and performance indicators/milestones. This needs to be the case if we are to deliver on the common purpose.
The national indicators are not very visible. The annual Well-being of Wales Report deserves more attention from Welsh Government, from public bodies, from the media and the Senedd too.
Furthermore, milestones were interpreted by Welsh Government as complementing the goals (what will be achieved by 2050) rather than mid-points or milestones on the way to 2050. The latter approach might have helped accelerate progress.
- **Partnerships:** My predecessor and I have consistently called for Welsh Government and public bodies to simplify the partnership landscape in Wales, which is complex and confusing, adding to capacity and resource pressures. This has also been the conclusion of several ESJ and PAPAC Committee reports.
- **Integration:** The WFG Act should frame other policies and legislation. It should not

be seen as a competition, contradiction or an additional layer of burden. For example, there are many assessment requirements in a multitude of laws. These need to come together where possible, e.g. the climate change risk assessments, equality assessments, population needs assessments etc. They should be taken into account by PSBs as they complete their well-being assessments.

- **Communication:** There is a need to ensure consistency in using the language of the WFG Act in legislation, policy, guidance, ministerial statements, performance frameworks and terms of reference for review boards. Currently it can be confusing for public bodies and a barrier to implementation. For example, there are inconsistencies in what we mean by the terms ‘involvement’ compared to ‘consultation.’

Specific drafting issues

There is case to consider drafting amendments to improve the following issues:

- **Clarity of the application of the five ways of working to everything public bodies and Public Services Boards (PSBs) do.** This might require an amendment to ensure it is not perceived as being limited to only setting well-being objectives.
- **Corporate areas for change.** The concept does not appear on the face of the WFG Act but only in the statutory guidance. The statutory guidance, Shared Purpose, Shared Future 1, outlines how embedding the WFG Act into corporate functions is essential to delivering meaningful change. These corporate areas of change include: corporate planning, financial planning, workforce planning, asset management, procurement, risk management and performance management. There is a case to include these corporate areas of change in the legislation to raise their importance and visibility as they are such a key driver for the change we need to see.
- **Clarification/overlap of monitoring powers between the Auditor General and the Future Generations Commissioner:** The statutory guidance of the Act outlines the Commissioner’s role as supportive, with the powers of advice, assistance and the ability to carry out reviews. The Auditor General for Wales is described as holding the accountability of public bodies in meeting the Act. Therefore, there is some confusion with the Commissioner’s duty to monitor and assess the progress public bodies are making towards their well-being objectives.
- **Town and Community Councils (TCCs)** should be involved in drafting PSB plans as they are required to help implement them further down the line. This creates an involvement and delivery issue which needs to be addressed. The threshold requirements for the involvement of TCCs is currently a £200K budget over the previous three years. This should be looked at as currently TCCs can come in and out of scope depending on the annual variation of their funding.
- **Advisory Panel:** The membership of my advisory panel is statutory and very specific. There is a case to allow more flexibility in the membership of the advisory panel to provide the range of skills and experience appropriate to the work plan of the

Commissioner. In light of this issue, I have extended the role of my Audit and Risk Committee to undertake an advisory function (as well as an assurance function).

- **Funding from the Senedd:** To protect my independence, there is a case for the Commissioner to stop being funded by the Welsh Government and become funded directly by the Senedd out of the Welsh Consolidated Fund as Audit Wales is.
- **Publication by public bodies and PSBs of objectives, plans and annual reports.** The Act should be amended to ensure there is duty on public bodies and PSBs to send the Commissioner a copy of their objectives and plans as well as their annual reports detailing progress made to meet their objectives. This would make the monitoring of progress much easier and improve transparency/accessibility for the public to identify the relevant documents and progress. There is currently no consistency in the publication and accessibility of such information.
- **Imbalances of powers in relation to public bodies and PSBs:** My office is mandated to provide intensive support to PSBs in designing their assessments and plans, but I have no duty to monitor their progress. On the other hand, I am required to monitor the progress of public bodies in meeting their objectives but have no duty to provide support to them in setting their objectives individually. However, my office does provide general advice through the Future Generations report. Some consistency would be welcome.
- **Public Services Boards:** PSBs are not a legal entity capable of holding funds or of employing staff. They can only rely on the resources and capacity of their members. PSB members have told my office that this is an issue that can inhibit collaboration. I believe the role and functioning of PSBs could be improved.

I must respond to three elements of the work of PSBs in a short space of time: the PSBs' well-being assessment consultation; during the drafting of their objectives; and then again during the formal consultation on plans. This is disproportionate and is not the most effective use of resources. I would recommend the legislation is changed to keep the formal consultation part and to revoke the other two elements. Several PSBs have told my team that the 5-year cycle is too short, meaning that they have to re-do their well-being assessments and plans too often. This reduces their capacity to deliver.

- **Timelines synchronisation** - The Act is based on 5-year cycles in line with Senedd elections. Now that Senedd elections have moved to a 4-year cycle, many requirements will have to happen more often (like the Future Generations reports) which affects the capacity of public bodies and my team as well as PSB cycles. It will also create clashes, for example local government elections are not planned to change which means this will clash with the 2037 Future Generations Report and the arrival of a new Commissioner; one year I will have to produce advice to PSBs as well as produce a Future Generations report; and the Future Trends reports will get out of synchronisation with the local elections. We think the timelines should be reviewed and amended so we can address any issues.

- **Scope and enforceability of the Commissioner’s section 20 review recommendations:** See section 3 for further information.

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

There is more to do to improve the way reporting across the public sector is aligned, streamlined, and used to drive learning and improvement. This is an area where further support and clarity could enhance the effectiveness of the WFG Act.

Reporting and review requirements on public bodies and PSBs:

- **Content of well-being statements:** The statutory guidance of the Act sets out the content of public body well-being statements and states that public bodies are required to review and report annually on the progress they are making towards their well-being objectives and steps. Most public bodies meet these requirements through their regular corporate planning and annual reporting mechanisms. However, some public bodies have not placed their well-being objectives and steps at the heart of their corporate strategies. This is more common in the health sector (as [Audit Wales](#) also reported), with some bodies failing to clearly state their well-being objectives.
- **Review and revision of well-being objectives:** In producing an annual report, public bodies and Public Services Boards must review their well-being objectives and steps. Again, most do this through regular annual reporting mechanisms but given some public bodies have not placed their well-being objectives at the heart of their corporate strategies, a minority of public bodies are not sufficiently revisiting and reviewing their objectives regularly. Timescales are also mismatched in terms of reviewing objectives, which adds to challenges of bodies following the recommendations of the Future Generations Report.
- **Disparity in well-being objectives:** There is currently a lack of a common framework for setting well-being objectives, steps and measuring them, meaning that the current piece-meal approach makes "assessing the progress made towards well-being objectives" impossible. Analysis by my team and by [Audit Wales](#) found that public bodies rarely state the timescales they envisage to meet their well-being objectives, or the resources (including financial) needed to meet them in their well-being statements, despite this being a statutory requirement. A mandated common framework by Welsh Government for every sector would make this significantly easier for the Auditor General for Wales, the Commissioner, and members of the public to understand progress in implementing the Act.
- **Monitoring progress on well-being objectives:** Whilst public bodies and PSBs can set as many well-being objectives and steps as they like, there are currently nearly 300

well-being objectives and over 2,200 steps across the public bodies and 47 objectives, and 296 steps across Public Services Boards. Each objective and/or step often has different associated indicators. Therefore, measuring progress against each of these is highly resource intensive and does not lead to comparable results. I have conducted and commissioned analysis of the well-being objectives, but it is a challenge to resource this and keep up with the changes.

- **Stronger links to well-being goals:** My Future Generations Report 2025 offers advice to public bodies on setting well-being objectives and steps. A common framework, as suggested earlier, mandated by Welsh Government, could help public bodies and Public Services Board make a stronger link between each of their well-being objectives, the well-being goals and well-being indicators when they set and report on their delivery.
- **Impact Assessments:** Adopting a statutory Impact Assessment process for the WFG Act could help improve the application of the Act in decision making and policy design. While there are no statutory WFG Act impact assessments, several public bodies have designed them with the support of my office and use them regularly. A good example of the positive impact of conducting such an impact assessment can be found in relation to the design of the [Welsh Government Waste strategy, Beyond Recycling](#).

Commissioner's review powers (Section 20):

My strongest power is to undertake reviews under Section 20 of the WFG Act. My office has undertaken two investigations so far. These have resulted in Welsh Government making changes to how they implement the Act; and the establishment of a procurement centre of excellence.

The power has been used as the ultimate form of advice when our usual form of advice had not been sufficiently considered or where a recurring issue had been flagged many times as being a key barrier to the implementation of the Act.

As a result of a review, I can make recommendations (suggestions). Although this has not happened, the Act allows public bodies to disregard my recommendations and send a justification for doing so. I have no powers to enforce compliance.

One criticism of the Act is the lack of enforcement powers. This is something the Committee could explore as part of their scrutiny of the enforcement elements of the legislation. One option in relation to Section 20 could be the ability to issue 'directions' or another form of mandated reasonable action which would need to be defined and limited – within devolution boundaries. This might also include some remedial action. There are other options too and legal advice would be needed to explore them.

It should be noted that undertaking Section 20 reviews is resource intensive. My predecessor could hold and use reserves to fund such exercises but changes in UK

accountancy rules mean that this is not an option available to me.

4. The effectiveness of guidance made under the Act

Statutory guidance: Some of the statutory guidance needs to be updated. The points made above reflect some of the changes required to the legislation and to statutory guidance to reflect the lessons we have learned over the last decade. The legislation is a framework, deliberately not prescriptive; but the guidance can be interpreted as a series of processes to complete. My team have already been discussing updating the statutory guidance for Public Services Boards with supporting organisations, including Welsh Government. I would be keen to be involved in any update of the statutory guidance by Welsh Government.

Guidance from my office: Alongside the statutory guidance, my team and other supporting organisations in Wales have produced resources and frameworks that support implementation of the Act including: Future Generations Reports; the Ways of Working Progress Checker; journeys towards the well-being goals; frameworks for project, service design and scrutiny; long-term and futures guides; and e-learning modules. We also provide advice to public bodies and, where capacity allows, the voluntary and private sector on applying the Act. For example, we have recently produced a business toolkit.

In 2024/25, we recorded 882 requests for our advice and assistance, a 9.4% increase compared to the year before. 46% of these were from public bodies with duties under the Act. My team receive excellent feedback for the support they provide. Our learning and development sessions have received feedback scores of 6.4 out of 7, with a 100% of attendees reporting improved confidence in applying the Act.

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

Current situation:

There are no specific enforcement mechanisms in the legislation as it stands. This was done by design and voted upon by the Senedd.

This means that judicial review applies by default. This is a difficult and costly procedure. It might also mean that only a class of people rather than individuals can use it. I understand that none of the very few attempts to use the Act in judicial review have obtained permission from the court to proceed.

There are specific duties in the Act in addition to the general duty which might be better ground for challenge (e.g. the duty to take all reasonable steps to meet well-being objectives).

The Public Services Ombudsman could hear, as I understand it, complaints about the non-compliance with the Act as maladministration, but only if the person could demonstrate personal injustice. This could prove difficult given the nature of the Act's duties.



The role of the Commissioner is designed in the Act to be a promoter not an enforcer. This means that I promote a principle, the sustainable development principle, and help it to be implemented by providing advice and making recommendations. This is the weakest type of Commissioner role.

This is different from the Welsh Language Commissioner, which is set up as a regulator setting standards, checking compliance and sanctioning breaches. A specific tribunal was also created. The Older People and Children's Commissioners are set up as champions of the rights of specific population groups and the Commissioners can support individuals directly to help protect their rights. This supposes that rights are set in law in the first place. The WFG Act does not create rights for future generations or current generations so that model could not apply (but perhaps it could be explored how the new United Nations Declaration on Future Generations could help support this model now it has been adopted).

Possible changes:

The WFG Act is a people's act, and this is why I see value in seeking to amend the legislation to ensure that people have access to easily accessible and affordable redress mechanisms or through the creation of rights (if devolution boundaries allow it or by working with the UK Parliament).

My team worked with the UK Parliamentary drafting team for [Lord Bird's Bill](#). We offered some solutions but recognise the challenges devolution boundaries cause in relation to justice issues in Wales and that the Senedd may not be able to create similar provisions (see clauses 30, investigations, 31 Applications to court, 32 Proceedings and 33 Judicial remedies).

The Bill gives a clear power to individuals to bring proceedings against a public body or to bring a case to the Commission for them to decide if they want to start an investigation.

The Bill created a power to conduct investigations in addition to the review powers similar to the Welsh Act, where the Commission can conduct an investigation if they suspect that a public body has failed to comply with its duties. If a failure were recognised, the Commission could apply directly to the High Court to mandate compliance with the recommendations or other actions chosen by the Court.

Granting us such a power would create significant additional responsibilities for my office through investigation, case management, enforcement policy and resourcing. It would also change the premise of my relationship with public bodies which is based on trust and support rather than fear of sanction.

The powers of the Public Services Ombudsman could alternatively be amended to extend their existing remit to help with the enforcement of the WFG Act.

I have already mentioned amending my review powers to give them more teeth. They could be extended to allowing me to review individual decisions (giving me a case work function)

but without proper resourcing it would detract our work and support to drive change.

The Information Commissioner in connection with Freedom of Information Act 2000 could be another model to explore. They can publish decisions which require compliance, or risk contempt.

Using the model of the Welsh Language Commissioner is another option. They have the strongest enforcement powers of Commissioners in Wales. Some of my advice, for example the Maturity Matrix, already shows some similarities with the Welsh Language Standards.

Importantly, I wanted to stress the preventative nature of the Act which needs not to be lost in discussions about enforcement. The WFG Act was designed to improve administrative practice and stretch organisations—to challenge the status quo and encourage long-term, joined-up, preventative approaches to Wales’ most complex issues. In doing so, it represents a different kind of legislation—one that drives positive behaviours, innovation and shared responsibility rather than compliance through sanctions. It is about preventing harm not compensating for harm done. This is a key feature that needs to be protected whatever enforcement mechanism is chosen this time round. The legislation needs to continue drive change upwards and not be dragged downwards or be distracted by litigation which risks stifling innovation.

I look forward to hearing the views of the public, witnesses, and the Committee on the issue of enforcement.

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

The WFG Act enables a longer-term, preventative approach to policy and public spending, which drives better outcomes and greater efficiency over time.

In his recent report [‘No Time to Lose,’](#) the Auditor General for Wales makes the value for money case clearly. He says: *“I urge public bodies to see the sustainable development principle as a value for money issue. We cannot afford to design solutions that do not meet people’s needs, burden future generations with avoidable higher costs, or miss opportunities to deliver more with the same or less.”*

The case for spending on prevention is unquestionable. For instance, Public Health Wales says that putting in place effective programmes to prevent poor health offers great value for money: “Prevention initiatives such as early years education, vaccination programmes, smoking cessation and support for carers can deliver excellent value for money - with an average return of £14 for every £1 invested in them. They also keep people healthier and address inequalities as well.”

Other public sector organisations will have similar compelling statistics about prevention. In fact, all the five ways of working provide value for money. For example, if we consider long term trends when building schools and hospitals, we can ensure these facilities are future

proofed, limiting the need to make adjustments in years to come.

There are good examples across public bodies of the value for money that is achieved by Act. However, value for money is not considered systematically.

A key finding from the Auditor General's report is: *"Public bodies also need to improve the information they use to inform planning and decision-making, get a better grip on resource implications, and make sure they can understand impact. These are key to achieving and demonstrating value for money, and to applying the sustainable development principle."*

While there is no framework that provides an overall picture of the extent that the Act represents value for money, the theory and examples from public bodies of the value for money provided by the Act make the case unequivocal.

Concluding remarks

As part of its inquiry, the Committee may want to consider the issue of resources. In July 2023, the Senedd's Public Accounts and Public Administration Committee Review of the Welsh Commissioners made a recommendation (number 15) that "Welsh Government conducts post-legislative review of the legislation governing all Commissioners, including a review of the funding allocated to them, with an update provided to the Committee in due course". The Committee may want to consider this matter of funding given how relevant it is to many of the response in this submission relating to the impact of the WFG Act.

Finally, I urge the Committee to model good practice in involving citizens in the deliberations of this inquiry. Given the way in which the WFG Act was developed following the national conversation 'The Wales We Want,' and given that involvement is one of the five ways of working, it is important you hear from a range of people and organisations as part of the inquiry. Citizens have a stake in this legislation in a way that you do not see with other laws and I know there is significant interest in providing you with evidence.

I look forward to meeting with the Committee to expand on these points and share further insights from my work and from the Future Generations Report 2025. I am committed to working with you as much as required in your work to ensure the WFG Act is a powerful and practical tool for shaping a better future for Wales.

In the meantime, if you require any further information, please let me know.

Yours sincerely,

A handwritten signature in black ink that reads "D. Walker".

Derek Walker
Future Generations Commissioner for Wales