
Senedd Cymru | Welsh Parliament

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

Ymateb gan: Sefydliad Materion Cymreig | Evidence from: The Institute of Welsh Affairs



IWA Consultation Response: Senedd Equality and Social Justice Committee

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

Introduction:

The Institute of Welsh Affairs is Wales' leading think tank, independent of government and political parties. By bringing together experts from all backgrounds, we conceive ambitious and informed ideas which secure political commitments to improve our democracy and our economy.

We provide platforms for debate, opportunities for people to make their voices heard and agenda-setting research. We are funded by our members, income from our events and training sessions, and supported by trusts, foundations and other funding bodies. We are a proud signatory to the Zero Racism Wales pledge, a Living Wage employer and hold NCVO Trusted Charity Mark Level One.

Our vision is to create a Wales where everyone can thrive.

The IWA is a registered charity in England and Wales: 1078435 and a company limited by guarantee registered in England and Wales: 02151006.

The IWA has long been an advocate for the Well-being of Future Generations Act (henceforth 'the Act') as a means to create a Wales which places improving wellbeing over the long-term at the centre of the nation's approach to policy and public service delivery. We have supported and worked alongside both Commissioners (to date) and his Office itself. We have also been a politically independent platform to champion the Act as well as for those who critique it to ensure it delivers the best outcomes possible.

In the lead up to the publication of the Commissioner's Future Generations Report,¹ the IWA worked on a number of internal policy research projects which helped to support the drafting of the report and its recommendations.

Particularly pertinent for the purpose of the Committee's scrutiny is a report² we produced for the Commissioner, analysing the wellbeing objectives and steps included in all public bodies' wellbeing plans (which are statutory obligations). The analysis, alongside some of the recommendations we made to the Commissioner, forms the basis of our response (although we are unable to speak to the direct findings of the report).

Finally, whilst we are glad that the Committee is undertaking scrutiny of the Act, we state at the outset that Welsh Government should commission a broad statutory review of the implementation of the Act to understand barriers to delivery and means to strengthen it for the future. The Auditor General has called for such a review since 2020.³

¹ [Future Generations Commissioner for Wales, 2025, Future Generations Report 2025](#)

² Note - we are unable to reference the findings of the report directly, due to it produced for an internal purpose by use of the Commissioner's office

³ [Audit Wales, 2025, No time to lose: Lessons from our work under the Well-being of Future Generations Act](#)

Wales is justifiably proud to be the first nation in the world to legislate to act in the interests of future generations. Our response is intended to ensure that the mechanisms to enable this to happen are in place. Included are key arguments for making efforts to strengthen the Act in the 7th Senedd.

Achievements

The Wellbeing of Future Generations Act is intended as a long-term behaviour change mechanism for public bodies who fall under its remit (which has, over time, expanded to cover 56 public bodies). Behaviour change in that it is intended to change the way that public bodies deliver their services, allocate resources and plan for the future. The Act has motivated a coalition of support from public bodies across Wales, who are proactively seeking to deliver in accordance with the Act and further best practice.

As such, it is a real achievement that the Act now frames much of the way that public bodies understand their remits and deliver their services. Public services are changing and this is promising, as this is the overarching purpose of the Act.

The Act is also having an impact on organisations who don't fall under its remit, including those in the private sector. Organisations like Principality,⁴ Wales and West Utilities,⁵ Bluestone⁶ and the FAW⁷ are just a few examples of businesses who have incorporated the Act into their strategies and activities, attempting to apply the five ways of working and the seven well-being goals. Whilst this is beyond the scope of the initial purpose of the Act, it displays the broader impact that it has had on changing the conversation in Wales. That the Commissioner's Office has produced a 'Toolkit for Business'⁸ also displays the wider impact the Act is seeking to have, beyond its primary purpose (this is supplemented by other organisations also attempting to translate the Act for application in the private sector⁹). Regardless of whether or not this should be an evolving area of focus of the Commissioner, the fact that the private sector is beginning to engage with the Act represents a sense of its perceived value and importance. It also acknowledges that engendering buy-in from organisations beyond the Act's remit will be vital for accelerating delivery and supporting the progress on long-term wellbeing goals.

We are also seeing newer Corporate Wellbeing Plans (and other strategies with similar purposes) starting to show a deeper understanding of how they can deliver in accordance with the Act. This is evident in the most recent round of Local Authority plans which are more comprehensive than their predecessors, especially when it comes to outlining how they will practically deliver their wellbeing objectives and steps. This shows that public bodies' awareness of how to apply the Act in their context is improving and *should* continue to improve over time.

All of the above speaks to the strong awareness raising, communications and external affairs efforts of the Commissioner's Office, which has effectively shifted the national conversation.

⁴ [Principality. 2024. Future Generations Fund](#)

⁵ [Wales and West Utilities. 2023. Sustainability Strategy](#)

⁶ [Bluestone. N.D. Sustainability](#)

⁷ [Football Association of Wales. N.D. The wellbeing of future generations](#)

⁸ [Future Generations Commissioner. 2024. Well-being of Future Generations Act: Toolkit for Business](#)

⁹ [Cynnal Cymru. 2023. The role of business in supporting future generations](#)

Public bodies, broadly speaking, are talking in the language of the Act. That this is the case is not inevitable, but represents an achievement. The task ahead is to translate intention to delivery.

Wales has also achieved significant soft power benefit from the Act on a UK and international stage. Globally, Wales was first to move to incorporating the UN Sustainability Goals into domestic legislation. As such, Wales has genuinely been a global pioneer. We have therefore seen international interest in replicating the Welsh approach by other nations as well as by Supranational Bodies.¹⁰ This impact is valuable in raising Wales' international profile. This is the area which has arguably seen the biggest achievements, whether that represents the priority of the legislation or not. Wales has set the terms for a global conversation on acting now for the benefit of future generations.

Whether or not this translates to public knowledge of the Act or its intentions is a harder criteria to measure and certainly would be a useful area of research enquiry in the future. The Act has made real progress in furthering the *collaboration* way of working, creating structures for dialogue between public bodies and external organisations and individuals. Yet, the *involvement* way of working is less clearly being implemented. Looking ahead, a focus on meaningfully involving citizens in how public money is spent, services are delivered and enacting communities' priorities, is sorely needed.

The achievements that the Commissioner's Office itself has pointed to as examples of the Act's impact include: the free school meals policy, the higher bar Welsh Government now places on road building, and elements of the Curriculum for Wales.¹¹ The challenge comes when analysing the extent to which these progressive changes (and others) happened *because* of the existence of the Act or not. This makes analysing the progress the Act has made complex and multifaceted.

Crucially, scrutiny of the Act and its achievements should acknowledge its purpose, remit, budget and powers. In public discussion in Wales, the Act is often discussed as a panacea for all of Wales' challenges. It is not so, and is not intended to be so. It is also not *responsible* for the continuing nature of the nation's systemic challenges. As such, we hope that the Committee's scrutiny of the Act is cognisant of this - holding the Act to such a high bar that it is impossible to deliver against.

Analysing the delivery of the Act

As part of the IWA's recent work with the Commissioner we have outlined some broad findings from analysing the wellbeing objectives and steps of public bodies strategies.

The Act requires public bodies to deliver according to five *ways of working* to achieve the seven well-being goals: long-term, integration, involvement, collaboration and prevention.

Our analysis found significant variance in the application of the different ways of working across our public bodies. Involvement and integration are the least frequently applied principles evident in their wellbeing strategies. This suggests that public bodies are still on a journey in delivering against the ways of working, especially those that have a higher bar to implement.

¹⁰ E.g. [United Nations. 2024. Declaration on Future Generations](#)

¹¹ [Future Generations Commissioner. N.D. Our Impact](#)

This is also the case with the alignment of public bodies wellbeing objectives and steps and the seven wellbeing goals. The least present goals evident were *A Globally Responsible Wales* and *A Wales of Vibrant Culture & Thriving Welsh Language*. That both of these are not the *primary purpose* of many public bodies raises the question of the degree to which public bodies are looking to deliver beyond their specific silo when making their strategies.

Whether or not the Act makes public bodies deliver differently, or whether it merely changes the way they communicate their ongoing work, is, therefore, unclear. Being aware of ‘*future-generations washing*’ - that is, speaking in the vernacular of the Act, whilst continuing to deliver in a manner which undermines it, is vital.

We also found little in public bodies’ strategies which took into account the *missions* or *focus areas* presented in the Commissioner’s 2023 *Cymru Can*¹² strategy. This could be because the timing of *Cymru Can* doesn’t necessarily align with public bodies publishing their strategies. It is published at a time which is more relevant for the Commissioner’s term of Office than corresponding to any particular periods relevant to public bodies. As a result, it is difficult for public bodies to take the strategy into account as they have already planned for their long-term commitments.

The timescales on which public bodies make their strategies, and corresponding wellbeing objectives and steps, vary significantly. Different public bodies are constantly publishing strategies, outlining wellbeing objectives which speak directly to the Act. This variance will only become further entrenched as new public bodies fall under the remit of the Act. This presents significant challenges for the oversight and scrutiny the Commissioner’s Office can practically undertake. They are not necessarily informed when new wellbeing objectives are made and there is no obligation on public bodies to involve the Office when drafting them. The periods that public bodies’ strategies and goals cover also vary greatly, with some covering over a decade, where others cover five years or less (in some cases due to political cycles). These misaligned timescales could have a significant impact on the Commissioner’s Office’s ability to influence policy delivery. For example, how are public bodies to take into account recommendations from *Cymru Can* and the *Future Generations Report* when they have already committed to strategies and goals which, in some cases, last until 2035? There are structural solutions to the Act which can alleviate this challenge.

Another challenge to scrutiny and accountability is that there is no shared or established terminology that governs public bodies’ wellbeing strategies. They are called different things and are written in completely different ways. Some use the terminology in the Act (as in, wellbeing objectives and ways of working), whilst others do not.

From an external point of view, it is also difficult to analyse the impact of supporting architecture put in place in the Act, such as Public Services Boards (PSBs).¹³ It is not particularly clear what their purpose is or indeed what they have achieved. More can be done

to uncover what best practice looks like for PSBs.

¹² [Future Generations Commissioner, 2023, Cymru Can](#)

¹³ [Welsh Government, N.d., Public Services Boards](#)

There are also significant gaps between well-intentioned wellbeing goals and steps, but relatively poor focus and detail on how they will be effectively delivered. Targets without the steps to achieve them are largely ineffective. There is therefore a need to further drill down into the detail of how public bodies practically deliver wellbeing-focussed policies.

A related issue is on the analysis metrics which underpin reviewing the performance of public bodies' wellbeing goals and steps. The robustness of the analysis metrics varies greatly. This again presents challenges for how ambitious goals are translated into implementable policies which make a tangible difference. If the public can't tell whether a stated wellbeing objective is hit or not, this can erode confidence in the Act as a vehicle for change.

Finally, there is not much evidence that public bodies are embracing a culture of long-termism in their delivery of public services. Public bodies which demonstrate some long-term thinking approach, invariably do not look beyond the mid-2030s. Consequently, they do not attempt to engage with the longer term challenges such as but not limited to climate change. This is in contrast to the example set by the National Infrastructure Commission for Wales,¹⁴ who have started to look ahead to 2100 in their activities,¹⁵ resulting in a completely altered perspective to their remit. This is long-termism and future generations thinking in practice.

Improving the effectiveness of the Act

One of the key improvements to the Act would be **strengthening its enforcement**. This is a point we come back to in a later part of this response.

As alluded to above, establishing **clear timescales** for when public bodies are expected to update their wellbeing objectives, steps and wider strategies would be greatly beneficial. To be practicable, such a system could run in co-horts of different organisations.

More focus and emphasis is required on **delivery** of the Act. Wellbeing objectives and steps are a key part of how the Act functions. Yet, examining how they are practically and tangibly delivered is the necessary next step.

We should, therefore, continue and even increase the practical support for public bodies to draft and deliver their wellbeing objectives and the ways of working. This is critically needed in developing and **delivering a set of impactful, time-bound, realistic analysis metrics and steps**.

Additionally, the inflexible funding arrangements for public bodies runs counter to the approaches required of them by the Act. This is particularly clear in **the need to shift to more preventative spending**, particularly in the health system. Public bodies (and Welsh Government) have been as yet unable to have long-term funding certainty to deliver long-term goals. Wales' funding mechanisms constrains the Act's delivery and alleviating this constraint would enable public bodies to truly plan for the long-term.

¹⁴ [National Infrastructure Commission for Wales](#)

¹⁵ [National Infrastructure Commission for Wales, 2025. Annual Report 2024](#)

It is important to note the widespread constraining factors which undermine public bodies' delivery against the Act. The lack of long-termism or investment in preventative spending is unsurprising given the financial position of many public bodies across Wales. The lack of certainty provided over their long-term budgets inhibits their ability to deliver strategic, ambitious and long-term policy. The funding challenges currently experienced by public bodies, especially the case in local authorities mean a retrenchment to delivering for the short-term, rather than the long-termism enshrined in the Act. Short-term delivery puts the responsibility of solving our problems today onto the shoulders of future generations.

Review and reporting

Firstly, we have yet to see a post-legislative review of the Act, despite this being recommended by the Auditor for Wales since 2020.¹⁶ It is disappointing that a comprehensive review of the Act has not taken place sooner. If the Act is to live up to its aspirations, it should sit at the centre of our national conversation. Not placing a review as a priority, is therefore a concern.

This is worrying and suggests that we are failing to ensure that barriers to implementation of the Act are identified and alleviated in good time. We would recommend ensuring that Statutory reviews take place at least to coincide with the Commissioners' terms (seven years).

There is also a risk, given the functional nature of the Act on public bodies, that we fail to continue to engage the public in conversations around the Act and its underlying principles. The Act resulted from the *Wales we Want* national conversation. 10 years on, it is not clear how engaged the public are on this ongoing long-term journey. There is therefore a risk of the Act being a very 'policy-centric' conversation rather than one which engages directly with people and communities across the whole of Wales. The Act needs to be something delivered *with* rather than *for* or *on behalf of* communities.

For such an important piece of legislation, with such a broad remit, more scrutiny is needed on the Commissioner and their Office. Such scrutiny has a role in driving better delivery.

Enforceability and legal basis

As noted above, one of the key challenges evident from the first 10 years of the Act is undoubtedly the lack of enforcement mechanisms. This sits at the heart of its criticisms and the discourse around its achievements, or lack thereof.

The Act needs to be strengthened by providing some form of actionable enforcement mechanisms. The Act currently 'requires public bodies to consider the long-term impact of their decisions, work collaboratively with people, communities and each other, and take action to prevent persistent challenges such as poverty, health inequalities and climate change.'¹⁷ It's a 'legally-binding common purpose' that provides 'the ways in which specified public bodies must work, and work together to improve the well-being of Wales.'¹⁸

If public bodies do not, there is little meaningful enforcement the Office can undertake.

¹⁶ [Audit Wales, 2025. No time to lose: Lessons from our work under the Well-being of Future Generations Act](#)

¹⁷ [Future Generations Commissioner for Wales, 2025. Future Generations Report 2025](#)

¹⁸ [Welsh Government, 2015. Well-being of Future Generations \(Wales\) Act 2015: the essentials](#)

The Act gives the Commissioner the opportunity to conduct section 20 reviews of public bodies. It has, to date, rarely used this power. On the occasions that it has, it's unclear whether it has led to any change.

In any case, the Commissioner's Office has neither the capacity nor resources to conduct any significant number of reviews. Staff members also want to cultivate *coalitions of the willing* in regards to the Act. Conducting a review of obstructive public bodies would run counter to this intention and approach.

This 'all carrot, no stick' approach *may* work for some public bodies, who proactively deliver against the Act, but it won't work for *all*.

If the Commissioner is expected to take on enforcement, they would need the resource, capacity and expertise to do so. Similar capacity, resource and funding constraints have undermined Natural Resources Wales' ability to undertake its enforcement remit.¹⁹ If we want an impactful Act, we need to resource it as such.

The lack of any meaningful enforcement mechanism undermines public confidence in the Act. Primarily because they see activities undertaken by public bodies which are in direct contravention of the Act and nothing is done to challenge it. Indeed, when the Commissioner calls for change in an area of policy, it often goes unheeded.

There are, therefore, practical steps that could improve the enforceability of the Act, and we would recommend that such steps be the focus for the next Senedd.

Value for money

It is difficult to ascertain the value-for-money of the Act, especially given its long-term focus. It is not necessarily envisaged to deliver immediate results, rather intending to transform public service delivery over the long term.

Adequately assessing whether the Act delivers value for money is an area which requires more scrutiny. Additionally, there is a need to scrutinise where resources within the Office are being spent and how this leads to outputs. Audit Wales would be in a good position to undertake this work as are the Public Accounts Senedd Committee.²⁰

Overall, there is a need for better analysis of the impact of the Act, in order to help it to deliver on its transformative potential.

Summary

The IWA looks forward to following and contributing to the scrutiny of the Act. We hope that drafting a Committee report, based on the input of individuals and organisations across Wales, can lead to a strong set of recommendations on which to improve the implementation

¹⁹ [Senedd Climate Change, Environment and Infrastructure Committee, 2025. Natural Resources Wales: Annual scrutiny 2024-25](#)

²⁰ As per, [Senedd Public Accounts and Public Administration Committee, 2024. Scrutiny of Accounts:](#)

[The Future Generations Commissioner for Wales 2022-23](#)

of the Act in the future. We would welcome the opportunity to expand on our response above, in whatever capacity.

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