

Cytûn - Churches Together in Wales

Cytûn's Policy Officer's response to the Public Accounts Committee's consultation: Barriers to the successful implementation of the Well-being of Future Generations (Wales) Act 2015

0.1 Cytûn is the representative body of the major Christian denominations in Wales, which have a presence in every community throughout the country, along with a number of other Christian organizations operating in Wales. A full membership list can be found here:

<https://www.cytun.co.uk/hafan/en/who-we-are/>

0.2 This response has been prepared by Cytûn's Policy Officer, Revd. Gethin Rhys, based on his work with the churches and as Lead Representative for Religion on the Third Sector Partnership Council. Due to time constraints, it was not possible to fully consult with all Cytûn members about the content, so this is a personal response.

0.3 Some answers are based on a paper commissioned by the Welsh Government and co-authored by Gethin and others within the third sector in Wales, and published shortly after the publication of the Future Generations Commissioner's 2020 reports and the Wales Audit Office Act. The full paper can be found here: https://wcva.cymru/wp-content/uploads/2020/06/Responding-to-the-Climate-Crisis_.pdf

1. Awareness and understanding of the Act and its implications.

1.1 Outside Wales the Act has attracted considerable attention and praise. I have received inquiries from churches in Scotland, England, Northern Ireland, the Republic of Ireland and Canada to know and understand more about the Act. In the case of Scotland, churches there are considering asking political parties there to include a commitment to a similar law in their manifestos for the 2021 election.

1.2 Within Wales, awareness is patchy. Some churches and other civil society organizations are well aware of the Act and want to see its fruits in the daily lives of the people they work with. Others are very vague in their understanding, or have not heard of it at all. The weakness of indigenous Welsh mass media contributes to this - although the substance of the publicity given to it this year in the *Big Issue* magazine with its wide circulation among members of churches in Wales and the rest of the UK has certainly helped to raise awareness.

2. The resources available to public bodies to implement the Act and how effectively they have been used.

2.1 One common misconception about the Act is that it is another burden on the scarce resources of public bodies in Wales - added to equality and human rights duties, the Welsh language, environmental standards, etc. I think it is important to convey to public bodies that the "five ways of working" mandated by the Act are an alternative way of working - not additional ways of working to the usual way. Long term, preventative, integrated, collaborative and inclusive policy making and implementation should over time be able to save money and resources, rather than having to ask for more. Thinking long-term in policy formulation and implementation will save wasted resources on undoing unforeseen consequences; preventing problems from occurring will certainly save resources; integration will ensure that policies do not contradict and undermine one another; collaboration will provide an opportunity to anticipate difficulties and find partners at the earliest opportunity

to operate more efficiently; and being inclusive from the outset will save resources later on trying to reach under-represented groups or present a bilingual face to a programme devised in English only.

2.2 I had the opportunity to be involved in a series of three workshops devised by a number of third sector organizations in conjunction with the civil service in early 2018. A report on them, entitled *All Together!*, was published in November 2018

https://www.wwf.org.uk/sites/default/files/2018-11/WFG%20Workshops%20Report%20FINAL%2035951_Eng_PRESS_QUALITY_WEB.pdf

These workshops demonstrated the value of a collaborative approach to the Act and its possibilities.

3. The support that the Future Generations Commissioner provides to public bodies.

3.1 Naturally, I have no direct experience of discussions that are essentially private. It was disappointing that only one member of the Commissioner's staff attended the *All Together!* workshops in 2018 (see Qn 2), especially as the Permanent Secretary and a host of senior Welsh Government officials attended, and it was a golden opportunity to influence the entire civil service.

3.2 The Commissioner's early decision to abolish the [Climate Change Commission for Wales](#) was deeply disappointing, and removed a distinctly Welsh voice from the most important debate of our time, and an important source of support for public bodies. Our paper, [Responding to the Climate Crisis](#), recommends re-establishing this body.

4. The leadership role of the Welsh Government.

4.1 The Welsh Government has a very important role in promoting the Act and its implementation. This seems fragmented at the moment. There are some shining examples of trying to weave the well-being goals and (less often) the ways of working into policy areas as a whole.

4.2 This can be seen, for example in [Planning Policy Wales](#) published in December 2018. Sadly, the draft [National Plan 2040](#) does not have the same structure despite the promises in the first few pages. In particular, it is assumed throughout the document - as in many other Welsh Government documents - that economic growth is an unalloyed blessing, rather than measuring such an objective against the well-being goals. Nor does the Plan contain many indications that the five ways of working have had a significant influence on its formulation or are intended to influence implementation. Local Development Plans show even less awareness of the Act and its far-reaching implications. The publication of the new Planning Policy Wales following the formulation of most Local Development Plans demonstrates a lack of integrated, long-term and preventative working, and dramatically reduced its influence.

4.3 A similar pattern is seen in the Welsh Government's [International Strategy](#). I was involved in the consultation process around this strategy, and attended several meetings sponsored by the Welsh Centre for International Affairs and the Third Sector Partnership Council with officials and the then Minister, Eluned Morgan MS. The Strategy published in February 2020 placed a lot of emphasis on the well-being goals, and the final document was very different to the first draft we saw, demonstrating that a collaborative approach had been adopted in its formulation. Nevertheless, there was a fundamental weakness in chapter 3 of the strategy ([This is Wales: Products](#)) where the Act is referred to only once,

and again economic growth and the growth of international trade are taken for granted to be goods in their own right, without considering their impact on all well-being goals. Two of the economic sectors specifically suggested for promotion (cyber security and compound semiconductors) are linked to the arms trade (among other things), but the strategy does not weigh up the impact of their promotion on future generations in Wales or on Wales as a globally responsible nation.

4.4 It is encouraging, on the other hand, that Wales has joined the network of [Well-Being Economy Governments](#), and I would hope that the significance of this would merit more attention in Government statements and action plans than just a brief reference on p. 15 of the recently published [Action Plans](#) for the International Strategy. This shows that the relevance of the action plans to the Act is inconsistent and, to my knowledge, there has been little co-operation with civil society in drawing them up, losing some of the momentum and goodwill created at the time Strategy.

4.5 More generally, the Act suffers from what the Commissioner calls 'gaps in implementation' of the Act, and there are many examples of these in the Commissioner's Report. I would note that this is an approach of the Welsh Government style to other ambitious laws as well, such as the Environment Act and the Social Services and Well-being Act. There are questions about the appropriateness of legislating on the basis of setting ambitions rather than on the basis of tangible actions that go beyond this Act. I would recommend Dr Sarah Nason's lecture, Welsh Administrative Justice: Rights, Duties, and Implications for Legal Services delivered at the 2019 National Eisteddfod. Unfortunately I have not been able to find the text of this lecture published, but some of it is contained in section 6.1 of Dr Nason's research brief for the Parliamentary Research Service on Administrative Justice in Wales - <https://senedd.wales/research%20documents/20-27-justice-senedd-1/20-27-web-english.pdf>

5. Any other obstacles to the successful implementation of the Act (e.g. Brexit, COVID, etc.).

5.1 As the Commissioner points out in her 2020 report, some of the current crises have accelerated the implementation of aspects of the Act, by forcing integrated working in the face of difficulties that came from directions beyond the control of the Welsh Government. On the other hand, work on considering the long-term implications of action taken has been hampered. The most obvious example of COVID is that the Welsh Government's Loneliness Strategy, [Connected Communities](#), was published in February 2020, while the action taken from March went against that strategy. While understanding the pressures on Government and other stakeholders, there is a great need to ensure that the implementation of the Act is so deeply embedded in the Welsh Government's policy-making process that even a sudden crisis attracts a response commensurate with the Act, and especially with long-term strategies already published.

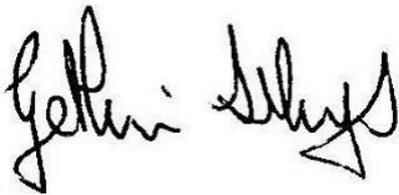
6. How to ensure the successful implementation of the Act in the future.

6.1. Successful implementation of the Act involves, in the first instance, embedding the five ways of working in Welsh Government, local government, and other public bodies such as the Public Service Boards. I think that that is even more important than embedding the seven well-being goals - if the goals are tried to be achieved by methods that are incompatible with the five ways of working, then the Act will not be implemented as

intended, and will the increase in the well-being of future generations far less than it should have.

6.2. In view of this, initial and in-service training of civil servants needs to be structured around the five approaches. This should not be an additional topic in the training, but the core of the training. This training should be co-ordinated with organizations and citizens outside the civil service, modelling the Act in practice. The same should be applied to the training of local government officials and officials of other public bodies - in a coordinated and integrated way, in accordance with the Act.

6.3. It is not clear to me that Public Service Boards are succeeding so far in delivering the Act's working methods across local authority areas. The Boards need to be imaginative, collaborative and inclusive in devising ways to listen to their local population in the early stages of policy and strategy formulation - and not primarily in 'consultation' towards the end of their formulation.



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