Wellbeing of Future Generations (Wales) Bill
Developing Statutory Guidance for Public Bodies – Discussion Document

FEEDBACK TEMPLATE

This template should be used to provide feedback in response to the discussion points included in the discussion document on guidance for the Well-being of Future Generations (Wales) Bill.

Completed templates should be sent to futuregenerationsbill@wales.gsi.gov.uk no later than 29 May 2015.

Feedback from City of Cardiff Council – May 2015

Additional comment regarding timing of the guidance: As the duty will apply to local authorities from the start of April 2016, the timing of the guidance is crucial in order for us to comply effectively. We would require the guidance by the New Year at the latest in order to fully interpret and implement any changes in time for the duty coming into force.

Discussion point 1 – What works?
Are there examples of guidance that work well in practice?
What are the key features of this guidance that make it effective?
Is there existing guidance that the guidance for the Well-being of Future Generations (Wales) Bill could build upon or simplify?

The City of Cardiff Council welcomes the aspirations set out in the Well-Being of Future Generations (Wales) Act.

The Council considers it important that any guidance assists public bodies in the process of making better informed, long-term decisions. It is important however to manage the creation of guidance effectively to minimise the risk of creating additional bureaucracy.

Given that local processes and structures are already in place (see question 8 for more detail) we feel that it is crucial that local flexibility is factored into the guidance, which respects local autonomy to agree local priorities, objectives and delivery arrangements. This is central to effective governance of all organisations. The guidance should focus on the outcomes required from the implementation of the Act, but the route taken to achieve these outcomes should be flexible.

An example of guidance that we feel has worked well is the Shared Purpose Shared Delivery guidance. This guidance outlined the requirements expected to be achieved, but allowed local discretion to be followed in achieving and implementing the requirements. The guidance also reconciled a number of
different requirements from various pieces of legislation into a clear and simple “ask” of public bodies.

**Discussion point 2 – The format of the guidance**

We’ve listed a number of key things we need to think about on the format and type of guidance in the discussion document. Are there any we have missed? What are your views on the format and type of guidance that works well?

Whilst the fulfilment of the Act should not become a ‘tick box’ exercise, checklists are useful in guidance publications as they provide a step by step framework that ensures that no major requirement is overlooked during the planning or implementation of the guidance. In saying that formal decision making in local authorities is already subject to a number of requirements. For example, local authorities need to consider a number of issues which need to be factored into decision making which include, but are not limited to:

- Equality Act 2010 - Equality Impact Assessment
- Welsh Government’s Statutory Guidance - Shared Purpose Shared Delivery
- United Nations Convention on the Rights of the Child
- United Nations Principles for Older Persons
- Welsh Language Measure 2011
- Health Impact Assessments
- Habitats Regulations Assessment
- Strategic Environmental Assessment Regulations

If not managed and coordinated the proliferation of requirements and assessments will create a burden that stifles rather than supports decision making.

There is the opportunity for the Future Generations (Wales) Act guidance to consolidate these requirements into a simple checklist/integration tool therefore creating a supportive environment to sustainable long term decision making. This type of approach would work as an ‘aide memoir’ to stimulate dialogue and debate, and provide a check and balance in the decision making process, rather than a ‘tick box’.

**Discussion point 3 – Understanding the goals**

What guidance is needed to better understand the well-being goals in the Bill?

In order to achieve ‘integration’ as per the sustainable development principle then organisations need to contribute to all of the 7 Well-being goals. However, it is not clear as to how far down the organisation hierarchy this needs to be filtered to. Corporate plans should contribute to all 7 goals, would it follow that it applies to services, teams and individuals as well? The guidance needs to clarify this point.
We strongly believe that strategic policy documents, such as an organisation’s corporate plan, need to demonstrate the organisation’s contribution to the well-being goals.

Clear and accessible guidance also needs to be provided in terms of:

- The value for money that can be achieved through working together and contributing to the goals
- Using the goals to identify and implement better ways of working across the public sector (e.g. incorporation of corporate social responsibility and environmental standards clauses within procurement contracts)
- Use of plain and clear language to ensure that people do not interpret the goals in different ways
- How to demonstrate the organisation’s contribution to the goal of being ‘globally responsive’

The guidance will need to show the hierarchy of legislation. An audit of all other policy and legislation needs to be undertaken by Welsh Government to ensure that the well-being goals are joined up with other legislation both emerging and existing. This is crucial.

For example:

- The “Power to Local People White Paper” makes some specific comments about corporate planning. The Future Generations (Wales) Act will place requirements on corporate planning. The requirements need to be reconciled
- The Social Services and Well-being (Wales) Act refer to and conceptualise “well-being”, as does the Future Generations (Wales) Act.

It is particularly important that each Act does not ask different things of stakeholders and that the approach is joined up and complementary.

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<tr>
<th>Discussion point 4 – Contributing to multiple outcomes (goals)</th>
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<tr>
<td>Are there examples of when a project has clearly contributed to multiple outcomes (more than one of the goals)?</td>
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A number of examples of local projects exist where activity contributes to more than one outcome. For example through “What Matters”, Cardiff’s Single Integrated Plan, we have been able to attribute successful projects to more than one outcome, and this is measured through a number of performance and population indicators.

Another example of where this has happened would be in the delivery of the Families First and Communities First programmes in Cardiff. Quarterly report cards demonstrate progress and achievements, and this can be attributed to
one or more of the programme outcomes in addition to our 7 citizen outcomes that are identified in What Matters.

Additional examples of projects that contribute to multiple outcomes include the Housing Partnership Project, energy efficiency retrofit of housing, RCF projects such as Cyd Cymru, and energy generation projects across the city. All of these projects contribute to the full range of sustainable development outcomes including community benefits, resilience, prosperity and health.

That said, whilst understanding the positive impact projects can have on multiple outcomes is important, artificially making connections between all 7 well-being goals may not always be productive. This is an example of bureaucratising the Act that all stakeholders are keen to avoid.

**Discussion point 5 – Setting well-being objectives**

| What guidance is needed in for public bodies in determining their well-being objectives? |
| What kind of guidance is needed on the types of steps that organisations may take to contribute towards the goals? |

As a general principle, well-being objectives should also be determined locally based on the needs of the local population. The guidance should therefore focus on these elements, rather than focusing on the frequency with which objectives are set, or through what process.

Fundamentally, public bodies would seek a clear definition of what represents a “well-being objective”. This will avoid any confusion when a public body is subject to any audit. The definition of a “well-being objective” should also be considered in the context of existing requirements, such as the need to publish “improvement objectives” (Local Government Wales Act) and, to a lesser extent, Equality Objectives. The guidance therefore needs to be clear as to what it means by ‘well-being objectives’ and how these sit in the context of existing corporate planning requirements for local authorities, such as the duty to have ‘improvement objectives’. Examples of well-being objectives would be useful as an illustration.

Within Cardiff, the well-being goals for Wales largely fit in with the outcomes of the locally determined What Matters strategy. The refresh of the What Matters strategy and the re-alignment of the Council’s corporate and partnership framework provides a further opportunity to reflect the contribution of the local area to the well-being goals in a manner consistent with the Well-being of Future Generations Act.

It would therefore be our suggestion that the objectives and contribution to the goals be measured through existing partnership mechanisms rather than establishing a new process and adding to the reporting burden that already exists.

It is our recommendation that organisations do not need guidance on how
they can contribute towards the goals, as it’s likely that this already takes place to a significant extent. It would be more beneficial to provide development support for organisations to improve upon the ways in which they measure their contribution to the goals.

Additionally, it is important to take account of the work currently underway within the social services functions to determine well-being objectives. Clearly these well-being objectives need to clarify rather than confuse the way in which accountability and delivery is understood, mapped and monitored.

### Discussion point 6 – Shared delivery

Are there examples of a clear relationship between the objectives (e.g. priorities) a body has committed to and an activity that is being delivered on its behalf or in partnership?

Within the partnership structure in Cardiff we are able to demonstrate the relationship between the priorities that were identified through our strategic needs assessment and the activity that is being undertaken to tackle issues.

This happens at both the strategic partnership level when reviewing city wide issues and initiatives, and on a neighbourhood basis, through each of the 6 neighbourhood action plans which identify the priorities within the neighbourhood (these differ across the six areas) and the activity that is planned to tackle them. This activity is captured through quarterly and annual reporting, and the annual planning is supported by the production of biannual intelligence reports.

The Council can also demonstrate its contribution to wider city outcomes through its corporate plan and we would welcome the opportunity to further reflect how our corporate and partnership policy framework contributes to the aims of the Act.

### Discussion point 7 – Sustainability challenges

What guidance is needed on the challenges listed above to help organisations understand how they link to goals?

There needs to be clear guidance that the sustainability challenges apply to all organisational levels and all organisational departments, particularly as some see this as an environmental issue. Due to the origin of the legislation in the Welsh Government department of Environment and Sustainable Development this is still the understanding in a number of areas.

There will also be a need to communicate the messages contained in the Act in as simple and clear a manner as possible. The guidance should therefore contain information on how to do this consistently across organisations and this could be via off the peg packages of training to include:
• Undertaking training with elected members to ensure that they understand the breadth of the Act, and the 5 principles that should be applied to decision making and planning.

• Raising awareness of the duty across the organisation and across all the statutory partners who will be compelled to adopt the Act. This will help ensure that all staff are aware of the principles and the occasions where they should be applied.

• Developing a monitoring / screening tool that will enable decision makers and planners to ensure that the principles have been applied through the corporate decision making process. We would, however, like to stress once again that this should not be in addition to the screening that is already taking place, but that it should complement or replace the current process so that it does not add an additional level of bureaucracy to an already complex process (see discussion point 2).

Practical examples of how the duty will impact on public sector services (sector specific) would also be very useful.

**Discussion point 8 – Sustainable governance**

**What guidance is needed in relation to the governance approaches?**

It is essential that public bodies are able to utilise existing governance models where they are suitable and that the guidance reflects and supports this. To ensure that we are not adding additional governance and reporting burdens upon organisations and partnerships it’s important that there is local flexibility within the guidance which will allow the use of current models. If the guidance is inflexible then there is a real danger that additional models and frameworks will be established for this purpose only.

All public sector bodies subject to the duty have governance models in train, most of which stem from a Welsh Government requirement (legislation, framework etc), and it would be useful for the guidance to highlight what aspects of these models and processes needs to change in order to comply with, and exceed, the requirements of the duty.

For example the table below interprets the policy framework for Cardiff emerging as a result of the Well-being of Future Generations Act and also other established or emerging pieces of legislation such as “Shared Purpose, Shared Delivery” and the Power to Local People White Paper. The City of Cardiff Council’s corporate and partnership policy framework is currently being re-aligned to ensure delivery against the likely requirements of the Act, both as an individual public body and as a partner on behalf of the wider local authority area.

<table>
<thead>
<tr>
<th>Policy Framework</th>
<th>Responding to the Future Generations (Wales) Act</th>
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Public Service Boards

Local Services Boards are already established. In Cardiff, the Board has a governance structure to ensure the delivery of its local well-being plan. In this way, the Cardiff partnership framework ensures that the local authority area is "taking all reasonable steps (in exercising its functions) to meet those [well-being] objectives." at the whole area level.

Well-Being Plan

Cardiff’s Single Integrated Plan/Well-being Plan (Cardiff: What Matters) is structured around 7 outcomes which are broadly compatible with the 7 well-being goals.

<table>
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<tr>
<th>Well-Being Goals</th>
<th>Cardiff Outcomes</th>
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<tr>
<td>• A healthier Wales</td>
<td>• People in Cardiff are healthy;</td>
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<tr>
<td>• A resilient Wales</td>
<td>• People in Cardiff have a clean, attractive and sustainable environment;</td>
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<tr>
<td>• A globally responsible Wales</td>
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<tr>
<td>• A Wales of cohesive communities</td>
<td>• People in Cardiff are safe and feel safe;</td>
</tr>
<tr>
<td>• A Prosperous Wales</td>
<td>• Cardiff has a thriving and prosperous economy;</td>
</tr>
<tr>
<td>• A Wales of vibrant culture and thriving Welsh language</td>
<td>• People in Cardiff achieve their full potential;</td>
</tr>
<tr>
<td>• A more equal Wales</td>
<td>• Cardiff is a great place to live, work and play;</td>
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<tr>
<td></td>
<td>• Cardiff is a fair, just and inclusive society.</td>
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The Well-being Plan identifies areas where collective action is needed to achieve economic, social and environmental well-being. The plan provides a clear roadmap for coordinating the resources of local partners within a local authority boundary (including public delivery bodies) to address local priorities. The Well-being Plan will also set clear milestones for the local area. This would discharge responsibility that "listed public bodies must work to achieve all of the sustainability goals, not just one or two."
The guidance should provide local areas with discretion to select the local outcomes which they want to deliver against. How local areas choose to demonstrate how their local outcomes contribute to the well-being goals should be a matter of local discretion. If these are to be audited, any specific expectation should be clearly set out up front to avoid confusion.

| **Trends Report** | The Single Integrated Plan/Well-being Plan is based on a comprehensive joint needs analysis of data. |
| **Liveable City Report & Needs Assessment** | The Liveable City Report that Cardiff will publish in June 2015 will present, annually, an objective statement of how the local area is performing against each outcome (as listed previously). It allows us to understand the performance of the area, identify areas for improvement and view the areas contribution to national indicators. |
| | Once published, it is intended that indicators in Cardiff’s Liveable City report will be consistent with those chosen by ministers. This will allow Cardiff to demonstrate the city’s (defined by the local authority area) contribution to key national indicators. Work done to date consulting with public sector partners and reviewing core city indicators has informed the macro level indicators selected in the Liveable City Report. |
| | It is important for Cardiff to be able to compare itself with other major British and European cities. The indicators chosen must therefore be comparable beyond Wales. |
| | The guidance should set out which national indicators the Ministers have selected. These may then be used to demonstrate the contribution of each local authority area. |

| **Council Corporate Plan** | The Corporate Plan outlines the Authority’s strategic policy priorities and forms part of the required statutory improvement framework as it discharges the Council’s obligations under the Local Government (Wales) Measure 2009 to publish a stage one plan, setting out how the Council plans to achieve its priorities for improvement. The Corporate Plan usually covers a 3-year period and is subject to an annual refresh. |
| | The Council’s Corporate Plan is structured around organisational priorities. It contains improvement objectives as required by the Local Government (wales) Measure. |
There is a risk that there is a proliferation of “objectives” which Local Authorities should have to produce, i.e.

- Improvement Objectives
- Well-being Objectives
- Equality Objectives

The guidance should consolidate these. As a consequence, the guidance should state clearly that “well-being objectives” should be self-selected by public bodies on a basis that they deem reasonable, and captured within the well-being plans.

**Sustainable Development Principle**

Local authorities have a well-established decision making process. In Cardiff it already has an approach which encourages policy development to be aware of the main statutory requirements that strategies, policies or activities must reflect. These are outlined in discussion point 2. The guidance could present a clear checklist and integration tool bringing together the issues and principles that should be considered.

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<th>Discussion point 9 – Examples of good practice</th>
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Looking at each of the governance approaches:
(a) Are there examples of organisations putting this into practice?
(b) Has it been successful? If so, why?
(c) Where is the expertise on each of these and how can they be involved?
(d) In relation to budget setting, what examples are there of organisations putting this into practice?

As previously mentioned, the governance approaches that the City of Cardiff Council have implemented around Families First and Communities First have been key to monitoring the outcomes of the programmes, enabling us to celebrate success, address underperformance and demonstrate our contribution towards wider programme and citizen outcomes.

The governance arrangements for both of these programmes have been developed locally - as the guidance on both of these programmes enabled us to do so. We would be more than happy to participate further in the development of the guidance and to share our experiences (good and bad) of developing these arrangements.

In relation to budget setting, last year the Council began the Cardiff Debate, a 3 year programme of engagement put in place to raise awareness of the current financial situation facing the public sector in Cardiff and to discuss the changes being proposed. Through undertaking this process the Cabinet and Council were able to make informed decisions and make adjustments to the proposed changes to meet the needs of the communities of Cardiff.
To some extent all public sector bodies have embedded sustainable development into their work, some more successfully than others. It would be useful for the guidance to highlight where and how public bodies could do better or go further when embedding sustainable development goals, objectives and principles, and for Welsh Government to show where they view the tensions in this embedding work lie.

**Discussion point 10 – Public Services Boards**

Are there any specific aspects of what a Public Services Board will be required to do that guidance is needed on?

It is important that the guidance recognises that in most local authority areas arrangements are in place which are operating successfully and the development of the Boards should be about building and improving what is currently in place rather than replacing it.

Again we feel the need to stress that the arrangements for Public Service Boards have local autonomy as there is not a 'one size fits all' approach that is applicable. Local authorities serve diverse communities and populations, something identified in the "Power to Local People" White Paper.

The Act provides an opportunity to add real value to partnership work, as many of the partner organisations address shared issues. The guidance should focus on demonstrating where the Act can add value to partnership working along with where improvement is required.

**Discussion point 11 – Working together at a local level**

Are there examples of collaboration at the local level, either through a Local Service Board or another mechanism that has been notably successful in delivering multiple outcomes (goals)?

We have numerous examples of collaboration through both the Local Service Board and Neighbourhood Partnerships in Cardiff. As previously outlined, we have also been able to report on this activity through our quarterly and annual reporting cycle.

Some examples of the good work that has been developed are:

- Models of joint commissioning (E.g. Families First)
- The Building Communities Neighbourhood White Paper, which enabled us to develop the neighbourhood model in Cardiff
- Developing and implementing the Stepping Up Toolkit and model in Cardiff to encourage participation from communities in service delivery and to aid in the Community Asset Transfer process
- The development and implementation of the Cardiff Debate engagement programme to date
- Embedding local delivery of services through the Families First and
Communities First Programmes to deliver against the single integrated plan outcomes

- Delivery of our Regional Collaboration projects such as the Alcohol Treatment Centre and Cyd Cymru

We would however like to build upon these examples of good practice further, through developing a joint case management system for Families First, Communities First and other programmes which will allow us to further understand the impact of the programmes and their contributions towards the programme and to improving citizen outcomes in Cardiff.

**Discussion point 12 – Statement**

Given that public bodies already communicate what they intend to do, what guidance is needed on what the statement must look like?

It is our suggestion that the guidance for the well-being statement should feature within the existing policy framework. Our suggestion would be that the well-being statement should sit within the local well-being plans given that this is our overarching partnership strategy for the city and all partners are required to demonstrate their contribution towards the outcomes (or goals) identified within the strategy.

It this is the case then the guidance needs to state that this is the overarching statement and that individual organisation statements in turn refer to this higher level overarching statement.

**Discussion point 13 – Reporting**

What guidance is needed on reporting on progress towards the achievement of objectives?

Are there examples of good practice in relation to reporting?

We strongly believe that reporting should be built into current arrangements. Where possible performance measures and mechanism that are already available, tested and fit for purpose should be used. There will be a need for organisations and partnerships to review current performance measures and processes so as to avoid duplication of effort.

Guidance should focus on what needs to be reported to demonstrate our contribution to the well-being goals and not the method of doing so, which should offer local flexibility.

The Act also states that Ministers will set national indicators. It will be important to be clear about the distinction between outcomes indicators and performance measures. There needs to be a clear distinction between “the performance of an area” and “organisational effectiveness”. This distinction between national goals and organisational objectives is critically important if complexity and confusion is to be avoided.
There is the opportunity to further align with other Welsh Government programmes and departments. For example, Social Services, Families First, Communities First and Flying Start are in the process of developing a combined outcomes framework, and it is also necessary to consider links with the measures being introduced under the Social Services and Well-being Act. All of the outcomes will eventually contribute towards the delivery of the well-being plan and it is important that reporting is streamlined and not viewed as separate exercises.

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<th>Discussion point 14 – Responding to the Commissioner</th>
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<tr>
<td>What guidance is needed on responding to recommendations from the Commissioner?</td>
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<tr>
<td>There needs to be clear guidance on the status of the Commissioners statutory and advisory recommendations, so that public bodies can respond appropriately and effectively.</td>
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