

Agenda – Equality and Social Justice Committee

Meeting Venue:

For further information contact:

Video Conference via Zoom

Rhys Morgan

Meeting date: 25 April 2022

Committee Clerk

Meeting time: 13.30

0300 200 6565

SeneddEquality@senedd.wales

Private pre-meeting and registration (13.00 – 13.30)

1 Introductions, apologies, substitutions and declarations of interest

(13:30)

2 Papers to note

(13:30)

2.1 Letter from Energy Saving Trust regarding the Fuel Poverty and Warm Homes Programme inquiry – 24 March 2022

(Pages 1 – 2)

2.2 Correspondence between ETRA and Welsh Government regarding HGV drivers

(Pages 3 – 6)

2.3 Letter from Minister for Social Justice regarding Debt and the Pandemic report – 31 March 2022

(Pages 7 – 22)

2.4 Letter from Equality and Human Rights Commission regarding strategic plan – 4 April 2022

(Pages 23 – 25)

2.5 Letter from Health and Social Care Committee regarding mental health inequalities inquiry – 5 April 2022

(Pages 26 – 29)

2.6 Letter from Finance Committee to all all Senedd Committees regarding Welsh Government Draft Budget 2023–24: Engagement – 11 April 2022

(Pages 30 – 32)



- 2.7 Letter from Minister for Social Justice regarding European Union Settlement Scheme– 13 April 2022**
(Page 33)
- 2.8 Letter from Minister for Social Justice regarding evidence session on Fuel Poverty and the Warm Homes Programme – 13 April 2022**
(Pages 34 – 35)
- 2.9 Letter from the Minister for Social Justice regarding changes to the Police, Crime, Sentencing and Courts Bill – 20 April**
(Pages 36 – 37)
- 2.10 Letter from Centrica regarding the Fuel Poverty and Warm Homes Programme inquiry – 20 April 2022**
(Pages 38 – 40)
- 2.11 Letter from Minister for Social Justice regarding Violence against Women, Domestic Abuse and Sexual Violence – 20 April 2022**
(Pages 41 – 45)
- 3 Motion under SO17.42 (iv) to exclude the public from the remainder of today's meeting**
(13:30)
- 4 Fuel poverty and the Warm Homes Programme: consideration of draft report**
(13:30–14:45) (Pages 46 – 100)
- 5 Legislative Consent Memorandum – British Sign Language Bill**
(14:45–15:00) (Pages 101 – 112)

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24/03/2022

Dear Jenny Rathbone MS, Chair of the Equality and Social Justice Committee,

Thank you for the opportunity to contribute to the Equality and Social Justice Committee's inquiry into fuel poverty and the Warm Homes Programme. This is a vitally important policy area which has only grown in significance in recent months.

Unfortunately, we are not ourselves able to provide further information regarding the points of clarification you referred to in your letter. British Gas is the Nest scheme manager with Energy Saving Trust being sub-contracted to deliver the advice service element of the scheme. For this reason, the Committee will have to request this information from British Gas who are best placed to respond to your queries. In the meantime, British Gas have approved the release of customer feedback related to the Nest advice service from January and February 2022 which we have included with our correspondence.

Yours sincerely

Jack Wilkinson-Dix
Policy Officer
jack.wilkinsondix@est.org.uk



Authorised and regulated
by the Financial Conduct
Authority, Financial Services
Reference No. 716195

Energy Saving Trust Limited
Registered in England
and Wales No. 02622374

Registered Office:
30 North Colonnade
Canary Wharf
London E14 5GP
VAT No. 123 3838 27

Comments	Local authority
<p>“From the first phone call I was helped and advised on each next step; it was a fast process, and I can't thank you enough. I was pleased to know there was someone out there looking into people's problems.”</p>	<p>Rhondda Cynon Taf</p>
<p>“Excellent. Everyone at Nest have been incredibly helpful, they genuinely cared and wanted to help us. Things started as quickly as possible. The whole process has been quick and efficient, everyone has been courteous and helpful, and the installation date was arranged to suit us.”</p>	<p>Swansea</p>
<p>“The person I spoke to explained everything so I could understand, and they were very professional in their manner. I will now be having insulation installed to save on energy costs and keep me warmer in winter.”</p>	<p>Powys</p>
<p>“Nest dealt with my telephone call swiftly and promptly and explained everything step by step: excellent. It was a friendly, helpful, and professional service: very efficient and great communication. I had heating, a hot water tank and a boiler fitted: excellent job fixing everything. I would recommend.”</p>	<p>Denbighshire</p>
<p>“They took the time to explain everything to me and were very polite. They were very prompt soon after: I didn't have to wait long for the work to be done at all. The workers were very thorough in doing their job and were very polite. I was asking them questions about the boiler (quite a few times) as it doesn't sink in my head straight away, and they were very patient with me.”</p>	<p>Carmarthenshire</p>
<p>“The initial advisor I spoke to on the phone was very polite, helpful and caring. They spoke to me like a proper person, not just like another call on a long list.”</p>	<p>Neath Port Talbot</p>
<p>“Everyone I spoke to or met were very informative and couldn't help me enough. Very nice, helpful people. They were prompt and efficient and gave lots of information about things I could be entitled to.”</p>	<p>Newport</p>
<p>“The whole process from beginning to end was dealt with and they rang me back every time they said they would. Each department I spoke were excellent. I was not stressed at all during the process: the advisors were professional, polite, listened to my concerns and explained everything in a simple way.”</p>	<p>Merthyr Tydfil</p>

Paul Davies MS

Economy, Trade & Rural Affairs Committee

25 March 2022

Dear Paul,

Thank you for your letter dated 28 February regarding arrivals from Afghanistan with HGV driving experience.

Officials are working closely with Working Wales (Careers Wales' adult guidance service) to ensure that refugees who settle in Wales can access the ReAct programme and its successor programme ReAct+. The programme can provide up to £1500 towards the cost of acquiring a UK lorry driving licence and associated qualifications such as the Driver Certificate of Professional Competence (DCPC).

Officials have already established the evidence requirements for entry to the ReAct programme, in consultation with agencies who are supporting refugees and the Welsh European Funding Office; we expect that refugees from Afghanistan will have little difficulty in meeting these requirements.

The new ReAct+ programme will introduce a Personal Development Support grant which is designed to remove barriers to employment that are not skills-related; this grant may be used to assist with the cost of 'conversion' to UK driving licences.

Working Wales can arrange for interpreters to assist with the information, advice and guidance process. Working Wales is also working closely with the Wales Strategic Migration Partnership and local authorities to ensure that refugees have full access to employability and skills support.

I have asked officials in skills division to get in touch directly with displaced People in Action to promote the Welsh Government's free HGV driver training programme to support Afghan people and others based in Wales looking for employment within the industry.

Yours sincerely,

Vaughan Gething

Vaughan Gething AS/MS

Gweinidog yr Economi
Minister for Economy

28 February 2022

Dear Vaughan and Jane,

Following publication of the Committee's report A New Direction for HGV Drivers I was contacted by Displaced People in Action who informed me that many of the Afghan people who arrived in Wales in 2021, have experience of driving very large vehicles, which often comes from military service. Displaced People in Action have told me that many of those with experience would be keen to become HGV Drivers here in Wales. They also refer to the provision of free training to get HGV licenses which is being provided in England by the UK Government.

Recruiting arrivals from Afghanistan as HGV drivers seems as if it could help to alleviate the current drivers shortages we face. Please could you let me know the following:

- Has the Welsh Government considered promoting the **HGV driver apprenticeship programme** directly to refugees in Wales, including those who arrived from Afghanistan last year?
- The UK Government's website describes **HGV Skills Bootcamps** as "free training courses in England." Please can you clarify whether refugees in Wales can access these, and whether you would consider supporting them to access the training either via transport to an English course or by running a similar course in Wales?

I am copying this letter to Jenny Rathbone MS in her capacity as the Equality and Social Justice Committee and to Delyth Jewell MS in her capacity as Chair of the Culture, Communications, Welsh Language, Sport and International Relations Committee.

Kind regards,



Paul Davies MS

Chair: Economy, Trade and Rural Affairs Committee

Croesewir gohebiaeth yn Gymraeg neu Saesneg | We welcome correspondence in Welsh or English.

Jenny Rathbone MS
Chair
Equality and Social Justice Committee

31 March 2022

Dear Jenny,

Please find update to the Equality and Social Justice Committee relating to recommendation 2 of the report on Debt and the Pandemic which was published in December 2021.

Recommendation 2 states that the Welsh Government should commission expert research into the relationship between addiction and debt and report back to this Committee on progress. This research should cover addiction in all its forms including gambling, alcohol and other substance addictions and the Welsh Government should write to the Committee with an update on progress and timescales for completion and publication before the end of March 2022.

You will be pleased to note that officials have carried out an initial desk-top research exercise to discover what already exists in terms of the evidence base on the relationship between addiction and debt. This work has highlighted that although there is more literature available relating to the relationship between gambling and debt, including a report commissioned by Public Health Wales in 2019, Wales needs to broaden the scope of surveys and other data collection methods to explore levels of gambling harms across Welsh communities more accurately.

In terms of other forms of addiction such as alcohol and substance addiction, there is a lack of good quality data and much less evidence available on the relationship between these types of addiction and getting into debt.

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

In terms of the next steps, we are now looking at how we can link in with Public Health Wales and considering developing a specification and commissioning research on this topic later on this year. A copy of the desk-top research exercise can be supplied to the committee if this is helpful.

Yours sincerely,

A handwritten signature in black ink that reads "Jane". The signature is written in a cursive style with a long horizontal stroke above the first letter.

Jane Hutt AS/MS

Y Gweinidog Cyfiawnder Cymdeithasol
Minister for Social Justice



Exploring the relationship between addiction and debt:

Initial scoping work

February 2022

This document is structured in four parts:

- 1) Context for the work
- 2) Search terms used
- 3) Summary of key points
- 4) Further information about the research located (oldest to newest)

1) The context for the scoping work:

Recommendation 2. *The Welsh Government should commission expert research into the relationship between addiction and debt and report back to this Committee on progress. This research should cover addiction in all its forms including gambling, alcohol and other substance addictions and the Welsh Government should write to the Committee with an update on progress and timescales for completion and publication before the end of March 2022.*

Accept in Principle

The links between addiction and an individual experiencing problem debt is considerable and the providers delivering specialist debt advice services through the Single Advice Fund have an established Action on Gambling Harm project that is improving advisor training helping them to identify people who show possible signs of gambling harm.

The importance of the undertaking research of all forms of addiction that serve as an underlying cause of debt is acknowledged. Officials in the Health and Social Services research team will collaborate with relevant policy colleagues in order to determine how long the research would take; what budget there is available to undertake it; if there is sufficient Knowledge Analytic Service resource to manage it; and how it fits with other priorities and commitments in evidence plans.

An update will be provided to the Committee before the end of March 2022.

2) Search terms used:

- Addiction debt / problem debt
- Addiction and debt / financial problems / financial harms
- Gambling and debt / problem gambling / gambling addiction / gambling harm / gambling disorder
- Alcohol / problem drinking and debt / financial problems / financial distress / financial loss / risky drinking
- Substance misuse and debt / substance use disorders (SUD) / social consequences
- Drug misuse and debt

3) Summary of key points

- Gambling is an ordinary pastime for some people (who experience any undue negative effects), but is associated with addiction and harmful outcomes/consequences for others. Moreover, gambling is associated with higher financial distress and lower financial inclusion and planning, and with negative lifestyle, health, well-being and leisure outcomes. Some factors that might make someone more likely to develop a gambling disorder include: drinking heavily or using illegal drugs, those who are struggling financially or are unemployed.
- The social consequences of pathological gambling such as financial loss are among some of the most concrete and obvious social consequences.
- In 2012, the Joseph Rowntree Foundation reported 'Good quality data on drug and alcohol misuse is sparse. The evidence that does exist, however, notes a relationship between addiction with poverty and social exclusion'
- Findings from one systematic review conducted in 2013 showed that (a) problem gambling has several adverse effects on individuals, families, and family functioning, and (b) family involvement in problem gambling treatment is linked with better treatment outcomes and improved individual and family functioning.
- In 2013, NatCen conducted an in-depth exploration of the relationship between money and gambling behaviour and found that although problem gamblers were more likely than non-problem gamblers to have forms of financial debt, just under two-thirds of problem gamblers (62%) reported having no debt.
- In 2013, a 5-year qualitative longitudinal study found that the impacts of specifically problematic gambling also cascaded through players' social networks in ways that affected the emotional and financial wellbeing of those closest to them. Also partners and spouses - typically wives – report the detrimental effects of gambling on household finances.
- In 2015, a study about gambling related harm found there was a clear identification of different levels of severity in terms of financial harm within the general harms category from loss of surplus/erosion of savings (first level), to financial harms related to the reduction or loss of ability to meet expenditure that had immediate consequence e.g. inability to purchase food, medication, inability to pay for heating and water (fourth level). The study concludes that 'It is important to caveat that the harms outlined in this study can occur due to engagement in other behaviours and can be exacerbated by the influence of comorbidities or existing dysfunction'.

- Drawing on a representative sample from England, one study found associations with problem gambling and mental health (anxiety, neurotic symptoms and substance use problems) and psychosocial maladjustment (suicidality, financial difficulties and social support).
- In 2016, researchers identified that although previous studies have examined different potential determinants of cannabis dependence, to their knowledge, a systematic review is lacking. The authors also reported that a deprived socioeconomic situation (low education, low social status, financial problems) is an important precursor of the development of cannabis dependence among youths and young adults. This is in line with other findings, where an excess risk of cannabis dependence was found for recent-onset users with a low family income and major financial problems.
- In 2019, Public Health Wales commissioned a piece of work to explore the impact of gambling and the project was led by Bangor University. The work identified debt as one of many gambling harms which can have adverse impacts upon the health and well-being of individuals, families, communities and society. Many of the harms experienced by gamblers extend to their families and friends. In line with definition changes, it suggests that Wales needs to broaden the scope of surveys and other data collection methods to explore levels of gambling harms across Welsh communities more accurately. Develop the evidence base of what works to reduce gambling harms in different settings.
- In February 2020, the National Audit Office reported that evidence on the causes and impacts of gambling problems is limited compared with other addictions, such as alcoholism, or consumer issues such as problem debt... government does not have the same level of evidence on gambling addiction compared with public health issues such as obesity and alcohol dependency. There is also a lack of longitudinal data to measure the impact of gambling problems.
- In September 2021, Public Health England published an evidence review on gambling harms. There was considerable evidence from the qualitative studies that gambling directly causes financial harms to gamblers and their close associates, particularly intimate partners. It reported gambling-related debt as a crucial harm that can lead to other harms such as relationship problems, physical and mental health problems, and crime. Overall, the evidence of harms is limited and the review sets out where further research is needed.
- In 2021, a narrative literature review was published about what is known about the impact of gambling-related harms on concerned significant others' (CSOs) wellbeing and identifies areas of future enquiry. The review identified

both knowledge and methodological gaps, including that relatively little is known about impacts to CSOs' subjective wellbeing.

- In January 2022, a REA was published about women's experiences of gambling and gambling harm. There are many findings reported such as around 7% of the population in Britain is negatively affected by someone else's gambling (equal to 4.5 million adults and children); affected others are generally women; and women are more likely to experience all the negative impacts of someone else's gambling. Also the evidence on the gambling harms experienced by women as affected others centres on financial harms (including economic abuse and criminal activity that causes financial harm) and personal relationship harms. Although the evidence base is thin, it nonetheless illustrates the far reaching impact of harms on partners, immediate family members and wider social networks. This evidence review identifies seven important gaps in knowledge where further insight is needed.

4) Further information/context below about the research located (oldest to newest)

[Foresight project Brain Science, Addiction and Drugs \(March 2005\)](#)

- Various science reviews published e.g. - Problem gambling and other behavioural addictions ([summary](#)) – 'Many types of harm are associated with gambling, including financial damage from losses and lost employment, harm to families and close relations, and the commission of crime to support a gambling habit'

[The Biopsychosocial Consequences of Pathological Gambling \(nih.gov\) - 2005](#)

- This article reviews the consequences of pathological gambling and aims to familiarize mental health clinicians with this psychiatric disorder.
- The social consequences of pathological gambling, such as financial loss, increased crime, lost time at work, bankruptcies, and emotional hardships faced by the families of gambling addicts, are the most concrete and obvious.

[poverty-culture-behaviour-full.pdf – June 2012](#)

- 'general patterns of drug use and alcohol consumption exhibit little correlation with poverty or social class. But these average statistics do not deal with the extremes in the population: alcohol misuse and the incidence of problematic drug users (PDUs) are much higher among marginal groups such as the prison population, young offenders, and homeless people'.

- 'Good quality data on drug and alcohol misuse is sparse. The evidence that does exist, however, notes a relationship between addiction with poverty and social exclusion'

[Toula Kourgiantakis MSW RMFT, Marie-Christine Saint-Jacques PhD & Joël Tremblay PhD \(2013\) Problem Gambling and Families: A Systematic Review, Journal of Social Work Practice in the Addictions, 13:4, 353-372.](#)

- This review identified and analyzed 30 empirical studies conducted between 1998 and 2013 examining the effects of problem gambling on families, the impact of family involvement in problem gambling treatment, or both.
- The literature shows that (a) problem gambling has several adverse effects on individuals, families, and family functioning, and (b) family involvement in problem gambling treatment is linked with better treatment outcomes and improved individual and family functioning. Implications for research and clinical practice are discussed.

[NatCen Social Research](#) – Gambling and Financial Management, 2013 (a number of publications are available for this project – various briefings, [academic paper](#) etc.)

- Aim of the study was to understand the relationship between money, debt and/or financial hardship and gambling and the different pathways into gambling-related debt and/or financial hardship.
- Although problem gamblers were more likely than non-problem gamblers to have forms of financial debt, just under two-thirds of problem gamblers (62%) reported having no debt.
- The analysis identified four kinds of gamblers: 'controlled gamblers', 'uncontrolled gamblers', 'uncontrolled spenders' and 'chaotic spenders'.
- We propose an ecological model which captures the different factors that influenced people's financial decisions, including cognitive factors, control and compulsion, normative spending, resource and financial management, and the credit environment.

[NatCen Social Research](#) – 2013

This research aims to increase understanding of gambling and problem gambling by focusing on the social and environmental influences that drive behaviour change across a lifetime.

[University of Glasgow - Schools - School of Social & Political Sciences - Research - Research in Sociology - Research projects - Understanding Gambling 2013](#)

- [The briefing paper](#) presents findings from a [five year qualitative longitudinal study](#) that was designed to explore changes in gambling behaviour over time,

as well as the impacts of gambling on both players and those in their wider social networks.

- Found that the impacts of specifically problematic gambling also cascaded through players' social networks in ways that affected the emotional and financial wellbeing of those closest to them.
- Partners and spouses - typically wives – report the detrimental effects of gambling on household finances.

[Addictions Research Group | University of South Wales](#) – was established in 2015

[Langham, E., Thorne, H., Browne, M. *et al.* \(2015\) Understanding gambling related harm: a proposed definition, conceptual framework, and taxonomy of harms. *BMC Public Health* 16, 80](#)

- This work aims to facilitate the understanding of gambling related harm from a much broader perspective than is currently implied by the use of inadequate proxy measures and one that is consistent with moving towards a public health approach to gambling.
- Data regarding harms from gambling was gathered using four separate methodologies, a literature review, focus groups and interviews with professionals involved in the support and treatment of gambling problems, interviews with people who gamble and their affected others, and an analysis of public forum posts for people experiencing problems with gambling and their affected others.
- Harms from gambling are varied and diffuse, unlike the more direct and tractable harms caused by physical illnesses or even substance abuse.
- There was a clear identification of different levels of severity in terms of financial harm within the general harms category – loss of surplus/erosion of savings (first level), activities undertaken (e.g. additional employment or accessing more credit) to manage short term cash flow issues by either the person who gambles or an affected other (second level), financial harms related to the reduction or loss of ability to meet expenditure that had a non-immediate consequence e.g. opting out of insurance, non-essential repairs (third level), financial harms related to the reduction or loss of ability to meet expenditure that had immediate consequence e.g. inability to purchase food, medication, inability to pay for heating and water (fourth level).
- The paper concludes that 'It is important to caveat that the harms outlined in this study can occur due to engagement in other behaviours and can be exacerbated by the influence of comorbidities or existing dysfunction'.

[Cowlshaw S, Kessler D. Problem gambling in the UK: implications for health, psychosocial adjustment and health care utilization. *European Addiction Research* 2016; 22\(2\): 90-98](#)

- This study examines the associations involving problem gambling and indicators of mental and physical health, as well as psychosocial adjustment and health care usage, in a representative sample from England.
- Data were derived from the 2007 Adult Psychiatric Morbidity Survey, which is a representative study of adults (n = 7,403).
- There were associations with problem gambling and mental health (anxiety, neurotic symptoms and substance use problems) and psychosocial maladjustment (suicidality, financial difficulties and social support).

[Psychosocial Determinants of Cannabis Dependence: A Systematic Review of the Literature - FullText - *European Addiction Research* 2016, Vol. 22, No. 3 - Karger Publishers](#)

- The authors write that many studies have examined factors associated with the first onset of cannabis use and abuse. Currently, there is relatively little research regarding conditions under which cannabis dependence is more likely to emerge. Although previous studies have examined different potential determinants of cannabis dependence, to our knowledge, a systematic review is lacking.
- A deprived socioeconomic situation (low education, low social status, bad financial situation) has been reported to be an important precursor of the development of cannabis dependence among youths and young adults. This is in line with other findings, where an excess risk of cannabis dependence was found for recent-onset users with a low family income and major financial problems.
- Cannabis dependence has been linked to greater levels of impairment (financial, familial and psychopathological) and correlated with using other illicit drugs.

[Wardle, H., Reith, G., Best, D., McDaid, D. and Platt, S. \(2018\) Measuring gambling-related harms: a framework for action. Documentation. Gambling Commission, Birmingham, UK.](#)

- The full costs to society of gambling-related harm will be substantial, although not all of these costs are easy to measure in monetary terms. They include the personal impacts faced by individuals who have experienced problems in gambling, as well as associated impacts on family and friends. Examples can include declining health, the breakdown of family relationships, social ostracism and the consequences of dealing with unmanageable debts.
- Having consulted a wide range of British-based evidence about the impacts and experiences of gambling on people's lives the report proposes a definition of gambling-related harms - resources (e.g. debt), relationships and health.

[Schema Modes and Personality Disorder Symptoms in Alcohol-Dependent and Cocaine-Dependent Patients - FullText - European Addiction Research 2018, Vol. 24, No. 5 - Karger Publishers](#)

- Substance abuse is a very common disorder worldwide; it is associated with great economic costs, and emotional, social and financial problems.

[Dr Heather Wardle, University of Glasgow](#) has published extensively on the topic of gambling

- In 2019, GambleAware commissioned a project on 'Gambling-related suicide' – Wardle et al., published a [Scoping Current Evidence and Evidence-Gaps in Research on Gambling-Related Suicide](#)
- The report identifies where more research data is needed - it is important to understand both risk and protective factors that will impact on the relationship between gambling and suicide/ suicidal behaviours, as well as, explore mediators, confounders, moderators and covariates. Factors, such as debt, sleep and spirituality, were mentioned specifically by participants. Both survey and routinely collected linked data could explore these factors.

[Framing a public health approach to gambling harms in Wales: Challenges and opportunities \(bangor.ac.uk\)](#)

[Gambling-as-Public-Health-Issue-Wales.pdf \(bangor.ac.uk\)](#) 2019

- This report was commissioned and funded by Public Health Wales and led by Prof Robert Rogers, Bangor University. It provides an overview of gambling as a public health issue in Wales.
- Debt is identified as one of many gambling harms which can have adverse impacts upon the health and well-being of individuals, families, communities and society.
- Many of the harms experienced by gamblers extend to their families and friends. These include relationship breakdown, stress, anxiety and financial pressures.
- Certain groups in society can be more vulnerable to gambling harms such as people in debt.
- The report highlights what Wales could do to prevent gambling harms, for example - adopt a broader definition of gambling harms as 'adverse impacts upon the health and well-being of individuals, families, communities and societies'. In line with definition changes, broaden the scope of surveys and other data collection methods to explore levels of gambling harms across Welsh communities more accurately. Develop the evidence base of what works to reduce gambling harms in different settings.

[Public-Health-Approach-to-Gambling-in-Wales-ENG.pdf \(bangor.ac.uk\)](#) 2019

- This report was commissioned and funded by Public Health Wales and led by Prof Robert Rogers, Bangor University. The report consists of nine chapters.
- Chapter 3 - reviews the benefits of moving away from clinical conceptions of gambling problems (as essentially an addictive illness) towards the consideration of broader patterns of harms accruing to individuals, families and communities.
- Chapter 8 - provides a geo-spatial risk-index map to illustrate the likely distribution of vulnerable groups across Wales; using four case studies (Cardiff, Pontypridd, Rhyl and Brecon) to illustrate how risk is driven by different factors in different places.
- Overall, in the 2007 Adult Psychiatry Morbidity Survey, 8% of English adults had experienced debt but, among problem gamblers, this number spiked to 38%. Problem gamblers (7%) use of short-term and payday loans credit was more than double that of non-problem gamblers (3%).

[August 2020 - Gambling review and reform Towards a new regulatory framework](#)

- This report puts forward a series of policy recommendations ahead of the Government's anticipated review of the 2005 Gambling Act. It builds on the body of evidence contained in recent reports published by the [House of Lords Select Committee Inquiry](#), the [National Audit Office*](#), [the Public Accounts Committee](#) and [the All-Party Parliamentary Group for Gambling Related Harm](#)
- A range of different factors are related to the wider experience of gambling-related harm, including: experience of bankruptcy and/or debt.
- * February 2020 report - Evidence on the causes and impacts of gambling problems is limited compared with other addictions, such as alcoholism, or consumer issues such as problem debt... government does not have the same level of evidence on gambling addiction compared with public health issues such as obesity and alcohol dependency. There is also a lack of longitudinal data to measure the impact of gambling problems.

The National UK Research Network for Behavioural Addictions (NUK-BA) was set up in 2020 – www.nukba.co.uk¹

[The Gambling Policy & Research Unit | The Behavioural Insights Team \(bi.team\)](#) – launched in September 2021

[Double-or-nothing-March-2021.pdf \(smf.co.uk\)](#) - March 2021 –

This report assesses the economic impact of gambling.

¹ No access to this website on the WG laptop.

There are a number of frameworks conceptualising and categorising gambling-related harms all of which highlight the following five broad themes:

1. Financial costs (includes debts, asset losses and financial hardship)
2. Health costs
3. Work or study costs
4. Relationship or family costs
5. Criminal costs

[Landmark report reveals harms associated with gambling estimated to cost society at least £1.27 billion a year - GOV.UK \(www.gov.uk\)](#) – press release September 2021

- In 2019, the Department of Health and Social Care commissioned Public Health England (PHE) to undertake [a review of the evidence on gambling harms](#).
- The evidence review was carried out to inform what action is needed as part of a public health approach to gambling-related harms in England.

Financial harms (from the [summary](#) September 2021)

- Financial harms were examined in 31 studies. One high quality study reported that an increase in the number of electronic gaming venues in a local area increased the number of personal bankruptcies in that area. There was also considerable evidence from the qualitative studies that gambling directly causes financial harms to gamblers and their close associates, particularly intimate partners.
- PHE identified gambling-related debt as a crucial harm that can lead to other harms such as relationship problems, physical and mental health problems, and crime.
- The financial difficulties and debt experienced by gamblers and affected others were often severe. Several studies reported that gambling led to bankruptcy and housing problems including homelessness. Financial harms also affected the children of gamblers.
- The most socio-economically deprived and disadvantaged groups in England have the lowest gambling participation rates, but the highest levels of harmful gambling and they are also the most susceptible to harm.

The [summary](#) also identifies research gaps and states 'Until relatively recently, research on gambling has focused on people who experience severe problems, and there are clear gaps in the evidence base for the harms experienced by affected others and wider society'.

They found that the evidence of harms was limited...examples of further research needed are:

- a systematic review of longitudinal studies of risk factors in adults
- longitudinal studies on if or how community and societal factors can influence harmful gambling
- longitudinal quantitative studies on harms, including harms to affected others and societies

[The association between gambling and financial, social and health outcomes in big financial data - PubMed \(nih.gov\) - 2021](#)

- Gambling is an ordinary pastime for some people, but is associated with addiction and harmful outcomes for others.
- Gambling is associated with higher financial distress and lower financial inclusion and planning, and with negative lifestyle, health, well-being and leisure outcomes.
- Gambling is persistent over time, growing over the sample period, and has higher negative associations among the heaviest gamblers.

[How gambling harms the wellbeing of family and others: a review: International Gambling Studies: Vol 0, No 0 \(tandfonline.com\) – 2021](#)

- This narrative literature review presents what is known about the impact of gambling-related harms on concerned significant others' (CSOs) wellbeing and identifies areas of future enquiry.
- The review identified both knowledge and methodological gaps, including that relatively little is known about impacts to CSOs' subjective wellbeing. What is known, is confounded by different methods of identifying CSOs across studies, and the use of predominantly small, non-representative, and treatment-related samples.

[Women's experiences of gambling and gambling harm: A Rapid Evidence Assessment – January 2022](#)

- Grant funded by GambleAware and carried out by researchers at University of Bristol
- The purpose of this Rapid Evidence Assessment (REA) was to understand (1) what is known about the drivers of gambling participation and gambling harms among women and (2) what good might look like in terms of support and treatment for women harmed by their own gambling or someone else's.
- The evidence indicates that in Britain more men participate in gambling than women (43.6% of men compared with 40.5% of women, according to the

most recent survey data), although the gender gap seems to be narrowing; and online gambling is increasing among women and men.

- Gambling practices differ between men and women but also between different groups of women, with evidence that younger women are diversifying to gamble on multiple products. This highlights the importance of understanding the dynamic and changing nature of women's gambling practices and guarding against outdated gendered stereotypes.
- In terms of financial drivers, women may see the potential financial gains of gambling as a way of contributing to the household finances; a means to escape abusive relationships; a route out of poverty; or a means of gaining some financial independence.
- The evidence suggests that most people in Britain gamble without experiencing harm. However, for those who do experience harms from gambling, the effects can be severe and enduring.
- In Britain, women experiencing high levels of gambling harm are much more likely to be younger (aged 18-34), and to be from a Black, Asian or minority ethnic background, than women generally.
- Women experience multiple and inter-connected harms from gambling – particularly financial, relational and mental health harms.
- Around 7% of the population in Britain is negatively affected by someone else's gambling (equal to 4.5 million adults and children); affected others are generally women; and women are more likely to experience all the negative impacts of someone else's gambling.
- The evidence on the gambling harms experienced by women as affected others centres on financial harms (including economic abuse and criminal activity that causes financial harm) and personal relationship harms. Although the evidence base is thin, it nonetheless illustrates the far reaching impact of harms on partners, immediate family members and wider social networks.
- This evidence review identifies seven important gaps in knowledge where further insight is needed e.g. Gambling pathways and harm trajectories: while there is some qualitative evidence about women's gambling pathways and harm trajectories, this is mainly from outside Britain/UK and is necessarily retrospective (e.g. asking women about how past experiences influence present practices). Longitudinal research would provide insight into how women come to experience harm and routes out of harm; as well as experiences of harm over the lifecycle and intergenerationally. There is a lack of evidence on gambling harm related to productivity and performance generally; and cultural harms.

[Gambling disorder in the UK: key research priorities and the urgent need for independent research funding - The Lancet Psychiatry](#) – February 2022

- Although many people gamble recreationally without undue negative effects, a sizeable subset of individuals develop disordered gambling, which is associated with marked functional impairment including other mental health problems, relationship problems, bankruptcy, suicidality, and criminality.
- In this Health Policy paper, the authors outline the status of research and treatment for disordered gambling in the UK (including funding issues) and key research that should be conducted to establish the magnitude of the problem, vulnerability and resilience factors, the underlying neurobiology, long-term consequences, and treatment opportunities.

Gambling disorder | Royal College of Psychiatrists (rcpsych.ac.uk) sets out a list of risk factors

- Anyone can develop a gambling disorder. However, it is known that for some people the problem may be more likely to develop. Some factors that might make someone more likely to develop a gambling disorder include: drinking heavily or using illegal drugs, those who are struggling financially or are unemployed.
- People with a gambling disorder are more likely than other people to experience the following harms: e.g. financial harms including overdue utility bills, borrowing from family, friends or loan sharks...

Added in March 2022:

The Social Market Foundation (SMF) published the case for a statutory gambling levy - [The Case for a Statutory Gambling Levy - Social Market Foundation. \(smf.co.uk\)](#) link [here](#) for the briefing paper

Jenny Rathbone MS,
Chair, Senedd Equality and Social
Justice Committee

From: Marcial Boo, Chief Executive

Our ref: Rathbone944

By email only

4th April 2022

Dear Ms Rathbone,

EHRC Strategy 2022-25

I am writing to you with the Equality and Human Rights Commission's [Strategic Plan for 2022-25](#), which was laid before Parliament on 29 March. Our [Business Plan for 2022-23](#), with this year's priority activities, has also been published.

Our Strategy sets out six priority areas for us as Britain's regulator of equality and human rights and a UN-recognised 'national human rights institution'. I very much hope that we can work with you to deliver positive change in one or more of these areas:

- Equality in a changing workplace, where we will take legal action against discriminatory employers, enforce gender pay gap reporting, and work to reduce inequality and discrimination in health and social care, and in the police.
- Equality for children and young people, where we will work with education and qualifications regulators to reduce inequality in education as we emerge from Covid-19, protect rights for children and young people in institutional settings, improve access to apprenticeships and work with schools on exclusion and restraint policies.
- Uphold rights and equality in health and social care, where we will promote mental health reform, protect people with disabilities in institutional settings, support reform in social care, and work with health regulators and the NHS to improve access to health services for LGBT people and reduce inequality of outcomes, including in maternity services, for people with protected characteristics.

- Address the equality and human rights impact of digital services and artificial intelligence, where we will work with Ofcom and others to reduce online harm, and reduce online discrimination against those with protected characteristics, including through the use of algorithms, and work to reduce digital exclusion among older and disabled people.
- Foster good relations and promote respect between groups, where we will work with education and sports organisations and their regulators to reduce discrimination in sport and other leisure activities, and publish guidance on equality law to help service providers and others.
- Ensure an effective legal framework to protect equality and human rights, including by using our legal powers to investigate and take legal action to tackle discrimination, and use the public sector equality duty to require public bodies to promote equality in their work. We will publish data and evidence on equality issues and hold government stakeholders to account so they adhere to human rights standards.

These priorities have been informed by stakeholders and our assessment of the evidence of the equality and human rights challenges currently facing the country. Our goal is to focus our resources where we can make a lasting, positive difference to the lives of people across Britain.

Please share our Strategy with your colleagues so they too can identify where we might work effectively together to achieve shared goals. And please feel free to contact me with queries, or with issues to discuss or actions we can take to ensure that equality laws are enforced, human rights standards are met, and people can live well together, free from discrimination.

Yours sincerely,



Marcial Boo

Chief Executive

Arndale House, The Arndale Centre
Manchester, M4 3AQ

[equalityhumanrights.com](https://www.equalityhumanrights.com)

Equality and Human Rights Commission |

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—
**Health and Social Care
Committee**

Jayne Bryant MS

Chair, Children, Young People and Education Committee

Jenny Rathbone MS

Chair, Equality and Social Justice Committee

John Griffiths MS

Chair, Local Government and Housing Committee

5 April 2022

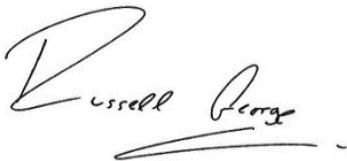
Dear Jayne, Jenny and John

Health and Social Care Committee inquiry into mental health inequalities

Further to my [letter of 14 December 2021](#) to the Children, Young People and Education Committee and the Equality and Social Justice Committee, I am writing to update you on the next steps for the Health and Social Care Committee's inquiry into mental health inequalities.

The evidence we have already heard clearly demonstrates the cross-cutting nature of the determinants of mental health inequalities, and the potential solutions. I was pleased that members of the CYPE and ESJ Committees were able to participate in some of the focus groups we arranged in February. I look forward to continuing to work with you and your Committees to identify areas of mutual interest and opportunities to work together.

Yours sincerely



Russell George MS

Chair, Health and Social Care Committee

Croesewir gohebiaeth yn Gymraeg neu Saesneg. We welcome correspondence in Welsh or English.

Health and Social Care Committee inquiry into mental health inequalities: update

Work to date

The Health and Social Care Committee launched an inquiry into mental health inequalities in January 2022. The terms of reference were very broad, seeking to identify which groups were most likely to experience mental health inequalities, what barriers they face, whether Welsh Government policy does enough to recognise and address these groups' needs, and what more needs to be done.

So far, we have gathered evidence by:

- Launching an open call for written evidence, which received over 90 responses. A summary of the written evidence prepared for internal use by the HSC Committee is attached in confidence.
- Running a digital communication campaign to promote the inquiry and encourage people to share their views.
- Working with twelve partner organisations to arrange a series of thirteen focus groups and two in depth interviews with participants across Wales. In total 77 people from across Wales took part. The focus groups and interviews were facilitated by the Senedd's Citizen Engagement Team, and, where possible, attended by members of the HSC, CYPE and ESJ Committees. A report summarising the findings has been published.
- Holding oral evidence sessions on 24 March with the Centre for Mental Health, the Mental Health Foundation, the Children's Commissioner for Wales and the Older People's Commissioner for Wales.

Emerging themes

Having reflected on the evidence we have gathered so far, we now plan to explore four key emerging themes in greater detail:

1. **Mental health and society:** the wider determinants of mental health, and the role of society and communities in promoting and supporting mental health.
2. **Community solutions:** the role of communities in promoting and supporting mental health, and social prescribing.
3. **The impact of mental health inequalities on people with neurodiverse conditions:** we have heard significant concerns about this group in the evidence that we have gathered so far. This is also a diverse group, many of whom may also experience inequalities relating to their other characteristics. The evidence suggests that some of the barriers experienced by

this group—such as a lack of joined up services, limited awareness and training, and diagnostic overshadowing—may also be experienced by other groups and communities. Looking at the experience of people with neurodiverse conditions will therefore also help us to explore broader themes that affect other groups.

4. **Role of the healthcare and wider workforce:** including mental health and equality awareness across the whole workforce, training, joined up working within the health service and with other organisations, and the role of GPs as the ‘front door’ to mental health services.

We plan to gather evidence on these themes through a range of mechanisms, including formal oral evidence, visits and further engagement activity. This will help us to hear a wide range of voices, including people with professional and lived expertise and experience of the matters we are considering.

Welsh Government

We will hold an oral evidence session in the autumn with the Welsh Government. During this session we will draw on all of the evidence we have gathered during our inquiry, including issues raised in our initial focus groups and written evidence submissions, as well as the evidence we gather during the summer term in respect of our four emerging themes.

As previously agreed, we will also coordinate with the CYPE Committee to seek a written update from the Welsh Government on progress made on key recommendations made by Fifth Senedd committees in respect of mental health.

Advisory group

To ensure that lived experience is at the heart of our inquiry, we will establish an online advisory group. The group will include 10 to 15 people with lived experience of mental health inequalities, who will be asked to consider discussion topics at key milestones during the inquiry and provide us with summaries of their views. This is likely to include, for example, before and after the Ministerial evidence session, before we finalise our report, and before any Plenary debate on our report.

We’ll be working with partner organisations to identify and support advisory group members, drawing where possible from the pool of people who took part in our initial focus groups, and taking account of characteristics such as geographical location, sex, age, and membership of specific communities such as neurodiversity, minority ethnic, sensory impairment, LGBTQ+ and unpaid carers.

Welsh Youth Parliament

As the Welsh Youth Parliament has identified ‘Our mental health and wellbeing’ as one of its priorities, we also plan to look for opportunities to work with WYPMs as appropriate.

Senedd Cymru
Welsh Parliament

Agenda Item 2.6

Welsh Parliament
Finance Committee

Chair, Children, Young People, and Education
Committee
Chair, Climate Change, Environment, and Infrastructure
Committee
Chair, Culture, Communications, Welsh Language,
Sport, and International Relations Committee
Chair, Economy, Trade, and Rural Affairs Committee
Chair, Equality and Social Justice Committee
Chair, Health and Social Care Committee
Chair, Legislation, Justice and Constitution Committee
Chair, Local Government and Housing Committee

11 April 2022

Dear Committee Chairs

Welsh Government Draft Budget 2023-24: Engagement

At our meeting on 25 March 2022, the Finance Committee (the Committee) considered its programme of engagement for the forthcoming Welsh Government's Draft Budget 2023-24, ahead of the Committee's Plenary debate on spending priorities, provisionally scheduled for 13 July. I am writing to Chairs of subject committees to share our thinking.

The Committee has agreed to undertake a number of engagement activities prior to the publication of the Draft Budget, in the autumn. These include, a stakeholder event, focus groups held with the general public, and working with the Youth Parliament.



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 SeneddFinance@senedd.wales

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Stakeholder Event

Following the restrictions over the past two years, the Committee is delighted to be able to return to holding an in-person stakeholder event to hear directly from interested organisations/individuals on the expected draft budget proposals, as well as the Welsh Government's approach to setting the budget and prioritising resources.

Cross-Committee engagement with stakeholders on the budget is crucial to effective scrutiny and therefore I would like to invite Committee Chairs or a Member of your Committee to join the event which will take place on the morning of Wednesday 15 June at Llanhilleth Miners Institute, Abertillery, Blaenau Gwent. If Chairs or Members are interested in attending, please contact the clerking team seneddfinance@senedd.wales by 1 June 2022.

Focus groups with the Welsh public

On behalf of the Committee, the Senedd's Citizens Engagement Team will be holding a series of focus groups on the Draft Budget with the Welsh public. The team undertook a similar exercise last year and will facilitate focus sessions over the summer term, asking the same or similar questions posed last year. The aim of this work is to improve public understanding and engagement with the Welsh Budget process. In addition, over the longer-term we hope to form a longitudinal study to allow the Committee to monitor perspectives and attitudes over time. Participants will be sourced through similar partner organisations to cover the same demographics as last year, and groups will be organised to focus on particular policy areas.

The Citizens Engagement Team will circulate the dates of sessions to all Committees, should any Members wish to participate. This will allow an opportunity for Members to hear first-hand from the citizens of Wales where spending should be prioritised.

Youth Parliament

To further complement our engagement work, the Committee has agreed to work with the Youth Parliament. Members of the Youth Parliament will be invited to take part in their own focus group session before the summer. It is hoped this will allow the best opportunity for Youth Parliament Members to influence the Welsh Government spending priorities.

Finance Committee Plenary Debate on the Welsh Government spending priorities

As mentioned above, the Committee intends to hold a Plenary debate on Wednesday 13 July on the Welsh Government's spending priorities for 2023-24. The outcomes of our engagement work will inform and feed into this debate. We



believe this debate allows the best opportunity for Members to potentially influence the Welsh Government's spending priorities prior to the formulation of the Draft Budget in the autumn.

Approach to Budget scrutiny

I will shortly be writing to Chairs, with regard to the Committee's approach to budget scrutiny, including information on the consultation and timetable. Whilst the Finance Committee's core function is to undertake financial scrutiny of the Welsh Government and associated public bodies, financial scrutiny should be embedded into the scrutiny work undertaken by all Committees. Therefore, I would welcome suggestions from Chairs to explore ways of working collaboratively to ensure the most effective financial scrutiny of the Welsh Government.

If you have any questions about any aspect of the Draft Budget process, please feel free to contact me or the Clerk to the Finance Committee, Owain Roberts, 0300 200 6388, seneddfinance@senedd.wales.

Yours sincerely



Peredur Owen Griffiths MS
Chair of the Finance Committee

Croesewir gohebiaeth yn Gymraeg neu Saesneg.

We welcome correspondence in Welsh or English.



Jane Hutt AS/MS
Y Gweinidog Cyfiawnder Cymdeithasol
Minister for Social Justice

Jenny Rathbone MS
Chair, Equality and Social Justice Committee
Cardiff Bay
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SeneddEquality@senedd.wales

13 April 2022

Dear Jenny,

Thank you for your letter of 31 March.

I welcome the monitoring reports the Equality and Social Justice Committee produces and the information you provide to EU citizens across Wales. It is vital that both EU citizens and the wider community are aware of the current situation in terms of applications and the support available so that we can all work collectively to ensure that EU citizens are given the best possible opportunity to secure their status and, more importantly, their futures here in Wales.

Welsh Government officials regularly review reports and publications regarding the EU Settlement scheme and will continue to do so to ensure that support aligns with need. You may already be aware of the recent publication by the Migration Observatory '[How Secure is Pre-Settled Status for EU Citizens After Brexit? - Migration Observatory - The Migration Observatory \(ox.ac.uk\)](#)' which Welsh Government policy officials will be reviewing over coming weeks to ensure that ongoing support for holders of Pre-settled Status wishing to convert to Settled Status continues to be specific to the needs of those individuals and provides for the needs of vulnerable citizens in particular.

In regard to your concern around the extension of the EUSS Family Permit scheme I can confirm that the First Minister wrote to the Prime Minister on 28 February on this topic and a response was provided by the Home Secretary on 4 March 2022. The response outlined that there are reasonable grounds for late return to the UK written in to the EUSS Family Permit scheme guidance and the circumstances of Ukrainian family members would be considered reasonable grounds for a late application, but to date no extension to this route has been granted.

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Early on in the crisis response to the situation in Ukraine the Welsh Government made a call to the UK Government to take a more strengthened humanitarian approach. More recently, the UK Government has made the visa concessions for the Ukraine Family Scheme and Homes for Ukraine scheme more flexible and have provided greater resource to respond to the influx in visa applications from Ukrainian citizens.

The Welsh Government will be providing provision for Ukrainian citizens as a 'super sponsor' under the Homes for Ukraine scheme and will continue to monitor the practicality of all routes into the UK as necessary.

Yours sincerely,

A handwritten signature in black ink that reads "Jane". The signature is written in a cursive style with a long horizontal line above the first letter.

Jane Hutt AS/MS

Y Gweinidog Cyfiawnder Cymdeithasol
Minister for Social Justice

Jane Hutt MS
Minister for Social Justice

1 April 2022

Dear Jane

EU Settlement Scheme

Thank you for your letter of 22 February 2022, which included the minutes of the EU Settlement Scheme (EUSS) Co-ordination Group meeting. We welcomed this information and your commitment to share the minutes of the Group's meetings to help inform our work for as long as it meets..

At our meeting on 21 March we considered the latest available statistics on EUSS applications from European citizens living in Wales and subsequently published our most recent monitoring report. We are particularly mindful of the current situation in Ukraine as a result of the Russian invasion and note the First Minister's statement in Plenary on 1 March, where he advised that he has asked the Prime Minister to extend the deadline for EUSS family permits in order to assist those fleeing Ukraine. We would be grateful if you could provide an update as to whether the UK Government will be extending this scheme's deadline beyond 29 March and what, if any, further exchanges the Welsh Government has had with the UK Government on this matter.

Yours sincerely,



Jenny Rathbone MS
Chair, Equality and Social Justice Committee

Agenda Item 2.8

JANE HUTT MS
Y Gweinidog Cyfiawnder Cymdeithasol
Minister for Social Justice



Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref MA/JH/00831/22

Jenny Rathbone MS
Chair of the Equality and Social Justice Committee
Welsh Parliament

13 April 2022

Dear Jenny,

At the meeting of the Equality & Social Justice Committee on Monday 21 March 2022, I agreed to provide the Committee further information to help with your deliberations as part of the inquiry on fuel poverty and the Warm Homes Programme.

In my written evidence, I referred to advice from National Energy Action suggesting the increase in the domestic energy default and variable tariff price cap that came into effect on 1 April will mean more than 280,000 households in Wales could be in fuel poverty. This represented a further 100,000 households since October 2021 and an 80% increase compared to Welsh Government 2018 estimates.

I explained the Welsh Government had commissioned the Building Research Establishment to provide advice on the estimated levels of fuel poverty in Wales. The [headline statistical](#) article has today been published and will be of interest as the Committee considers the evidence as part of the inquiry into fuel poverty and the Warm Homes Programme.

This latest assessment of the situation after the 1 April price cap increases, whilst likely to be an overestimate, is cause for concern. Despite the consistent and profound efforts of this Government, it suggests the increase in the domestic energy price cap, taken together with the surge in heating oil costs, means that up to 45% (614,000) of all Welsh households *could be* in fuel poverty using our 10% measure. Of these households, up to 115,000, or 8 % of all households *could be* in severe fuel poverty, spending 20% or more of their household income on domestic energy.

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

I have shared this advice with the UK Government, urging them once again to take action to relieve households from this unmanageable burden to their household finances.

I promised to provide the Committee with further information on two additional matters, the Warm Homes Programme Nest eligibility checker and the Annual Reports on Nest and Arbed, prepared by Pennington Choices Ltd.

My officials have been working closely with British Gas and the Energy Savings Trust to ensure the energy efficiency and eligibility checker is published to the Nest website by no later than the end of May. This will allow householders to seek independent advice about the steps that can be taken to save energy, and whether householders are likely to be eligible for free home energy efficiency measures through our Warm Homes Programme Nest Scheme.

Finally, I am pleased to attach a copy of the latest Annual Reports, prepared by Pennington Choices Ltd in relation to both the Warm Homes Programme Nest and Arbed schemes.

Yours sincerely,

A handwritten signature in black ink that reads "Jane". The signature is written in a cursive style with a long horizontal stroke above the first letter.

Jane Hutt AS/MS

Y Gweinidog Cyfiawnder Cymdeithasol
Minister for Social Justice



Llywodraeth Cymru
Welsh Government

Warm Homes Wales Arbed am Byth

Quality Assurance Audit Report 2021-22

Prepared By
Jade White

Version Control

Version	Date Modified	Modified by	Reason for Modification
Draft	14/01/2022	JW	N/A

Months	Date to be issued
April 2021 - Nov 2021	14 th Jan 2022

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1.0 INTRODUCTION

1.1 Background to the project

The Warm Homes Programme is the Welsh Government's flagship all-Wales fuel poverty programme for residential properties, which includes the demand-led Nest scheme and the area based Arbed scheme.

Since 2009, the Welsh Government has invested or leveraged over £366m to improve the energy efficiency of over 61,400 homes of those on low incomes or living in the most deprived areas of Wales. A further £33m will be invested into the Warm Homes Programme over the next year (2021/22) to improve up to a further 10,000 homes.

Under the Warm Homes Programme, the Welsh Government have contracted Arbed Am Byth to manage the end-to-end customer journey in the delivery of the area based Arbed scheme. This includes assessing the household's eligibility and identifying the measures that are suitable for the dwelling. Some of these include replacement boiler and whole heating systems, external and internal wall insulation, cavity and loft insulation and electric storage heaters. As appropriate, there is then a technical assessment carried out, followed by the installation of measures, arranging a post-installation inspection and invoicing the Welsh Government and the end customer as required.

The contract is divided into six regions upon which Key Performance Indicators are based. The six regions are as follows -

- Anglesey
- Ceredigion
- Gwynedd
- Pembroke
- Powys
- Rest of Wales (remaining 17 local authorities)

1.2 Our Brief

The Welsh Government has commissioned Pennington Choices Ltd (PCL) to undertake Quality Assurance Audits on the works undertaken by Arbed Am Byth, the Scheme Manager for the Arbed scheme. The purpose of each audit is to give the Welsh Government confidence that the services provided and the installation of measures undertaken by the Scheme Manager are compliant in terms of both the contract and industry standards.

Arbed am Byth - Whole house assessment (pre-installation) inspections

- In accordance with the contract, PCL will undertake an on-site audit of 5% of pre-installation inspections (up to 100 per annum). Pre-inspections are undertaken prior to measures being installed:
 - To ensure property eligibility has been confirmed
 - To ensure the starting energy rating for the dwelling has been accurately assessed and recorded
 - To ensure the most appropriate and cost effective measures have been recommended for the dwelling

Arbed am Byth - Work in progress inspections

- In accordance with the contract PCL will carry out a minimum of one on-site inspection per month (up to 80 per annum) of the following Measures:
 - External Wall Insulation
 - Internal Wall Insulation
 - Hybrid Wall Insulation
 - District Heating connection
 - A work in progress audit is to include a further on-site audit once the installation is complete.

Arbed am Byth - Post-installation inspections

- In accordance with the contract PCL will audit 15% (up to 300 jobs per annum) of completed installations:
 - To determine whether or not the installations have been carried out in line with the requirements of the contract and industry and manufacturer’s installation standards
 - To determine whether or not the in-home advice has been offered/provided in line with the requirements of the Scheme Manager Contract
 - To verify that a valid customer satisfaction form was accurately completed

Audit Selection Summary

Phase	Quantity
Pre-inspections	5% (up to 100 jobs per annum)
Work in Progress inspections	80 jobs per annum (when they occur)
Post-inspections	15% (up to 300 jobs per annum)

1.3 Report structure

The outcome of our inspections are to be reported, firstly to the Welsh Government’s identified contract manager and thereafter to Arbed am Byth. The report will be shared with the whole of the Domestic Energy Efficiency & Fuel Poverty team at the Welsh Government. Where the report makes recommendations, Arbed am Byth are to provide an outline of what actions they will take to implement these and their timescales.

1.4 Project oversight

The quality assurance contract is overseen by a group of Welsh Government staff, consisting of:

Staff member	Position
Nina Ley	Head of Domestic Energy Efficiency & Fuel Poverty
Chris Perrin	Fuel Poverty Programme Lead
Lee O’Sullivan	Area Based Programme Lead
Ian Griffith	Arbed Energy Programme Manager
Rhian Tickner	Nest Project Manager

2.0 EXECUTIVE SUMMARY

2.1 Executive Summary - Contract year 2021/2022

The content of this report refers to the Welsh Government Warm Homes Wales contract from 1 April 2021 to 3 November 2021 where the Arbed am Byth contract terminated for the 2021-22 financial year.

During this period, Pennington Choices carried out quality assurance audits of the Welsh Government scheme customer’s, as instructed by the Welsh Government and detailed above within 1.2 ‘Our Brief’.

During the contract year April 2021 to November 2021, Pennington Choices completed 503 inspections. Due to the Covid-19 Pandemic, Pennington choices carried out part desktop, part onsite audits. This blended inspection process was agreed by Welsh Government and proved an effective method of catching up on the programme due to lockdown delays and the reduction of the 2021-22 financial year targets to November 2021. The desktop vs onsite audit split was 62% onsite, 38% desktop. All inspections were consistently scored against the Pennington Choices audit criteria, which is detailed within Appendix A of this report. A data summary for Pre, WIP and Post audits is detailed within Appendix B of this report.

This 2021-2022 Pennington Choices report for the Welsh Governments energy efficiency scheme highlights the managing agent ‘Arbed am Byth’s’ performance throughout the year.

The overall ‘Pass’ results for all inspections completed by Pennington Choices from April 2021 to November 2021 was 100%. This figure has improved since the last annual report, which achieved an overall pass rate of 98.60%. The details of these results are noted in Table 3.1 ‘Overview of contract results to date’.

Pennington Choices and Arbed hold regular meetings to provide both parties with an opportunity to discuss the inspection results and enable Arbed to provide additional supporting information in regards to the installations. This process has ensured that all lessons learned are captured and included within a continuous improvement plan, which in turn will provide assurance to the Welsh Government that the expected levels of service and quality are being achieved.

3.0 INSPECTION OVERVIEW YEAR ON YEAR

Table 3.1 - Overview of contract results to date

Contract Year	Total Pass	Total Audits	Pass Rate %
2019-20	336	346	97.11%
2020-21	494	501	98.60%
2021-22	503	503	100.00%

Overall Pass Rate %	98.74%
----------------------------	---------------

4.0 INSPECTION OVERVIEW - 2021 - 2022

Table 4.1 - Overall Pass Rate 2021 - 2022

Inspection Rating classified as a PASS Result	Total	%
Passed Inspection & Advisory Feedback for Arbed	499	99.20%
Passed with Evidence Provided	3	0.60%
Passed Inspection (Documents missing)	1	0.20%
Passed Inspection Warranty Call - Installers/subcontractors to return to the property	~	~
Total	503	100.00%

The overall pass rating for 2021-22 made up of the above 'pass' criteria was 100%. Out of the 503 audits conducted 3 post inspection audits were remedial, further evidence was provided by Arbed am Byth to overturn the 3 remedials to passes.

Table 4.2 - Onsite inspections completed 2021-22

Onsite Inspections	Total	%
Completed Inspection	503	~
Passed Inspection / Advisory comments	499	99.00%
Passed with Evidence Provided	3	0.60%
Passed Inspection (Documents missing)	1	0.20%
Passed Inspection Warranty Call - Installers/	0	~
Remedial Inspections Installers/subcontractors to return to the property	0	~
Failed	0	~

During 2021-22, 3 remedial measures were captured. Arbed am Byth provided evidence to Pennington Choices which brought the total down to 0 remedial measures. Pennington Choices required Arbed am Byth to return to 0 customers properties to rectify the post remedial measures.

They did return to 1 property to enhance the installs cost effectiveness for the resident; however, this was an overturned pass install - property ref 40445. Please refer to Appendix C evidence provided summary.

5.0 INSPECTION OVERVIEW YEAR ON YEAR - 2021-22

The inspections classified as ‘remedial’ and ‘fail’ have reduced from the start of the contract.

Remedial actions identified by Pennington Choices inspectors during the inspections, are reported directly to Arbed each month. These findings are discussed in detail during a monthly ‘remedial’ meeting between Pennington Choices and Arbed.

This meeting enables all parties to view any photographic evidence and review any installers/subcontractor notes.

Remedial actions that required the Installers/subcontractors to return are categorised, as ‘Remedial’ and ‘Fail’, there is no contractual requirement for a Pennington Choices Inspector to revisit after the remedial works have taken place by Arbed.

6.0 INSPECTION OVERVIEW - DATA RECEIVED - YEAR 2021-22

Section 6 of this report details the volume of data received from Arbed and the total number of inspections completed:

- PRE inspection ‘ratings’
- Work In progress inspection ‘ratings’ and ‘contractors inspected’
- POST inspections ‘ratings’ and ‘measures inspected’

Table 6.1 - Pre Inspections completed

2021-22	Pre inspection Data Received	Pre Inspections Completed
Total	1095	100

Table 6.2 - Summary of Pre Inspection ratings

2021-22	Completed	Pass	Fail
Total	100	100	0
		100.00%	~

Table 6.3 - Work in progress inspections completed

2020-21	WIP inspection Data Received	WIP Inspections Completed
Total	3063	87

Table 6.4 - Summary of Work in progress inspection ratings

2021 -2022	Completed	Pass	Fail
Total	87	87	0
		100%	~

Table 6.5 - Post Inspections completed

2021-22	Post Inspection - Data Received	Post Inspections Completed
Total	1908	316

Table 6.6 - Summary Post Installation Inspection ratings

2021-22 Total Completed	Pass/Pass Advisory/Pass Evidence Provided	Pass No Docs	Pass Warranty Call	Fail	Remedial (*overturned)
316	315	1	0	0	*3
~	99.68%	0.32%	~	~	~
Overall Pass Rate % (Pass/ Pass Advisory/Pass No Docs/Pass Warranty Call, Pass Evidence Provided)					
100.00%					

3 remedial measures were captured at post inspection. Arbed am Byth provided evidence to Pennington Choices which brought the total down to 0 remedial post inspections. Please refer to Appendix C for more evidence provided information.

Table 6.7 - Summary of measures inspected

Measure Inspected	Total	%
Electric Storage Heaters	14	4%
Gas Boiler LPG	2	1%
Gas Fired Condensing Boilers	46	15%
Loft Insulation	44	14%
Oil Fired Condensing Boilers	29	9%
Solid Fuel Boiler	1	0%
Solar PV	180	57%
Total	316	100.00%

From the table above it is clear that most of the measures inspected at post installation phase are Solar PV at 57%, followed by Gas Fired Condensing Boilers at 15%.

During 2021-22 Pennington Choices noted energy saving light bulbs & water saving tap counts, which are included within the table below. Pennington choices have not inspected the installation of the light bulbs or water saving taps, a present/not present check of taps and count of LEDs have been carried out.

Count Checks	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	TOTAL
Energy Saving Light Bulbs	47		13		27	5			92
Water Savings Taps	1			5	1	2		17	26
Total	48	0	13	5	28	7	0	0	101

Table 6.8 - Summary of Post Results by Installers/subcontractors from contract Initiation

Installer	Pass	Pass (advisory/no documents/warranty call)	Remedial	Fail	Total	Evidence Provided Remedials	Evidence Provided Fails	Pass %
A E Energy/Insulation	12		1	3	16		1	81%
A W Renewables	10		10	1	21	9	1	95%
A&M Energy Solutions Limited	5	1		2	8		2	100%
Chris Allen Plumbing and Heating Limited	200	18	15	6	239	13	6	99%
Colin Laver Heating Limited	47	5			52			100%
Everwarm	4	2			6			100%
Gibson Specialist Technical Services	19	5	7		31	6		97%
Greenlands Heating	51	9	5	5	70	7	2	99%
Heatforce (Wales) Limited	21	3	4		28	4		100%
JM Renewables	77	4	4	2	87	4	2	100%
Carbon Zero	4				4			100%
Loft Solutions NW Ltd	27				27			100%
Madola Energy	6				6			100%
Unknown	28	9	1	2	40	1	1	98%
Wall-lag Wales Limited	20	5	1		26	1		100%
Warmplan Heating Engineers Limited	152	12	19		183	13		97%
Flintshire County Council	2				2			100%
Wales and West Utilities	1				1			100%
Total	686	73	67	21	847	58	15	98.23%

A E Energy/Insulation are the lowest performing installer at 81%. A W Renewables are the next lowest performing installers with a 95% pass rate.

Appendix A

Pennington Choices Auditing Criteria

INSPECTION TYPE	AUDIT CRITERIA	NOTES AS TO WHY
PRE INSPECTIONS	PASS	Clear Pass
	FAIL	Recommended measures not correct
WORK IN PROGRESS INSPECTIONS	PASS	Clear Pass
	FAIL	H&S issues / No ID cards/ and other issues that the Inspector notes on the WIP audit form.
POST INSPECTIONS	PASS	Clear Pass
	PASS ADVISORY (ONLY TO NOTIFY SCHEME MANAGER OF ANYTHING)	Only use this criteria to notify AaB of anything they should be aware of, this is not for any technical issues, may be used to feedback customer satisfaction, for staff, changes by customer to measures fitted, changes of property owner etc.
	PASS NO DOCUMENTS	Documents that are missing at inspection only - this can be Electrical certs, technical survey documents etc.
	PASS WARRANTY CALL	Only use when there is a technical issue with a heating system that the customer advises the system was working at the time of installation and up until the PC inspection - For example system now losing pressure.
	REMEDIAL	Technical issue - the installers/subcontractors must return and rectify- this can be a technical issue for example the measure is not installed as per technical survey document.
	FAIL	The measure is not installed to manufacturer's instructions and does not meet regulations/ needs rectified - the installers/subcontractors must return.

Appendix B Data Summary

PRE	No. Completed	PASS	WIP	No. Completed	PASS	Pass Advisory	FAIL	POST	No. Completed	Pass	Pass - advisory	Pass - no documents	Pass - warranty call	Remedial	Fail	Evidence Provided Fail/Rem
Apr-21	7	7	Apr-21	7	7			Apr-21	17	17						
May-21	0	0	May-21	0	0			May-21	25	23	2					
Jun-21	11	11	Jun-21	0	0			Jun-21	38	37				1		1
Jul-21	3	3	Jul-21	25	25			Jul-21	38	36	2					
Aug-21	15	15	Aug-21	30	30			Aug-21	64	60	3	1				
Sep-21	46	46	Sep-21	25	25			Sep-21	38	38						
Oct-21	17	17	Oct-21	0	0			Oct-21	30	27	1			2		2
Nov-21	1	1	Nov-21	0	0			Nov-21	66	64	2					
TOTAL	100	100	TOTAL	87	87	0	0	TOTAL	316	302	10	1	0	3	0	3

Pennington Choices originally captured 3 remedial post inspections. Pennington Choices were able to overturn and reduce the number of remedials to 0, upon receiving further evidence from Arbed am Byth. Details of the evidence provided can be found in Appendix C.

Appendix C

Initial Fail / Remedial Evidence Provided Summary

The below table displays a summary for the evidence provided for 3 remedials, enabling Pennington Choices to overturn to passes.

UPRN	Month	Contractor	Measure	Score	Evidence Provided	Notes	Contractor Response
40856	Jun-21	Chris Allen Plumbing and Heating Limited	Boiler Replacement	Pass	O/T was Remedial	Unable to find Benchmark. Condensate not fully into grid.	1. Benchmark -Oil boiler - Installer confirmed left at installation and Oftec registration forms (CD10/11 and tank form viewed and photographed by AaB inspector (dated 15/02/2021). p.59(of Benchmark photographed at inspection visit (clearer pic attached below).Details on FM. 2. Image provided to P/C, detailing termination of condensate below gully
42676	Oct-21	JM Renewables	Solar	Pass	O/T was Remedial	Faulty wiring, solar unit turned off	We have reviewed the audited properties and believe that 42676 should be overturned. The installation was completed on 08/08/2021 and the inspection for this property was carried out on 20/08/2021. At the time of the inspection, no issues with the electricians of the solar PV were identified. There was no warning alarm light illuminated on the inverter and the generation meter was working. I have attached photos from the post inspection for reference. There was a flashing red light on the generation meter which indicates that the system was working and there was no issue identified with the electricians nor raised by the householder. The attached photos show that the solar PV was working correctly and had generated electricity since the installation. We are confident that the work was carried out to the expected standard and that everything was working at the time of the inspection. Given the delay in between installation and your inspection, we challenge the validity of a remedial for this reason.

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40445	Oct-21	JM Renewables	Storage heaters	Pass	O/T was Remedial	3 storage heaters but only one wired properly	I believe that the installation of High Heat Retention Electric Storage Heaters (3 no.) at this property was PAS: 20230 (2019) compliant and conformed to the requirements of manufacture recommendations, electrical safety, Building Regulations compliance, and 18th Edition (IET) Wiring Regulations. Although I accept that the operation of 2 of these units on standard tariff for a short time was not in the best interest of the customer, and I have agreed that Arbed am Byth will offer compensation to the householder, to cover any extra costs of electricity used at standard tariff, between installation commissioning and the tariff matter being addressed. I hope that you will find this sufficient information to reconsider your position with regard to this record being identified as a technical failure. Arbed have returned to connect the heaters up to the economy 7 meter, which will provide the customer with more cost effective heating.
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Appendix D

Remedial/Failed Remaining

No remaining remedial or fails for 2021-22.

UPRN	Month	Post - Desktop	Contractor	Measure	Score	Notes	Contractor Response	Review
-	-	-	-	-	-	-	-	-



Llywodraeth Cymru
Welsh Government

Warm Homes Programme NEST

Quality Assurance Audit Report 2020-21

Prepared By
Jade White

Version Control

Version	Date Modified	Modified by	Reason for Modification
Draft	15/06/2021	JW	N/A

Month	Date to be issued
July 2020 - March 2021	June 2021

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1.0 INTRODUCTION

1.1 Background to the project

The Warm Homes Programme is the Welsh Government's flagship all-Wales fuel poverty programme for residential properties, which includes the demand-led Nest scheme and the area based Arbed scheme.

Since 2009, the Welsh Government has invested or leveraged over £366m to improve the energy efficiency of over 61,400 homes of those on low incomes or living in the most deprived areas of Wales. A further £33m will be invested in Warm Homes over the next years (2020/21) to improve up to a further 10,000 homes.

Under the Warm Homes Programme, the Welsh Government have contracted British Gas to manage the end-to-end customer journey in the delivery of the Nest Home Energy Efficiency Improvement Service (HEEIS). This includes assessing the household's eligibility and identifying the measures that are suitable for the dwelling. Some of these include replacement boiler and whole heating systems, external and internal wall insulation, cavity and loft insulation and electric storage heaters. As appropriate, there is then a technical assessment carried out, followed by the installation of measures, arranging a post-installation inspection and invoicing the Welsh Government and the customer as required.

The contract is divided into six regions upon which Key Performance Indicators are based. The six regions are as follows -

- Anglesey
- Ceredigion
- Gwynedd
- Pembroke
- Powys
- Rest of Wales (remaining 17 local authorities)

1.2 Our Brief

The Welsh Government has commissioned Pennington Choices Ltd (PCL) to undertake Quality Assurance Audits on the works undertaken by British Gas, the Scheme Manager for HEEIS. The purpose of each audit is to give the Welsh Government confidence that the services provided and the installation of measures undertaken by the Scheme Manager are compliant in terms of both the contract and industry standards.

Nest HEEIS - Whole house assessment (pre-installation) inspections

- In accordance with the contract, PCL will undertake an on-site audit of at least 5% of pre-installation inspections (with no fewer than 20 jobs per month). Pre-inspections are undertaken prior to measures being installed:
 - To ensure customer eligibility for HEEIS has been confirmed
 - To ensure the starting energy rating for the dwelling has been accurately assessed and recorded
 - To ensure the most appropriate and cost effective measures have been recommended for the dwelling

Nest HEEIS - Work in progress inspections

- In accordance with the contract PCL will carry out a minimum of one on-site inspection per month of the following Measures:
 - External Wall Insulation
 - Internal Wall Insulation
 - Hybrid Wall Insulation
 - District Heating connection
 - A work in progress audit is to include a further on-site audit once the installation is complete.

Nest HEEIS - Post-installation inspections

- In accordance with the contract PCL will audit 15% (with no fewer than 50 jobs per month) of completed installations:
 - To determine whether or not the installations have been carried out in line with the requirements of the contract and industry and manufacturer’s installation standards
 - To determine whether or not the in-home advice has been offered/provided in line with the requirements of the Scheme Manager Contract
 - To verify that a valid customer satisfaction form was accurately completed

Audit Selection Summary

Phase	Quantity
Pre-inspections	5% (no fewer than 20 jobs per month)
Work in Progress inspections	1 job per month (when they occur)
Post-inspections	15% (no fewer than 50 jobs per month)

1.3 Report structure

The outcome of our inspections are reported, firstly to the Welsh Government’s identified contract manager and thereafter to British Gas. The reports are shared with the whole of the Domestic Energy Efficiency & Fuel Poverty team at the Welsh Government. Where the report makes recommendations, British Gas are to provide an outline of what actions they will take to implement these and their timescales.

1.4 Project oversight

The quality assurance contract is overseen by a group of senior Welsh Government staff, consisting of:

Staff member	Position
Nina Ley	Head of Domestic Energy Efficiency & Fuel Poverty
Chris Perrin	Fuel Poverty Programme Lead
Lee O’Sullivan	Area Based Programme Lead
Ian Griffith	Arbed Energy Programme Manager
Rhian Tickner	Nest Project Manager

The group was involved in developing and agreeing the brief and providing supporting information relating to the agreed service level agreements.

2.0 EXECUTIVE SUMMARY

2.1 Executive Summary - April 2020 to March 2021

The content of this report refers to the Welsh Government Warmer Homes Wales contract between April 2020 to March 2021. Due to lockdown restrictions and furlough at Pennington Choices from April to June 2020, no audits of the Warm Homes Programme were undertaken. Therefore references to audits below refer to the period July 2020 to March 2021 when audits were taking place.

During this period, Pennington Choices carried out quality assurance audits of the Welsh Government scheme customer's, as instructed by the Welsh Government and detailed above within 1.2 'Our Brief'.

During the contract between July 2020 to March 2021 Pennington Choices completed 1056 inspections. Due to the Covid-19 Pandemic, Pennington choices predominantly carried out desktop audits. This proved an effective method of catching up on the programme due to lockdown delays. The desktop vs onsite audit split was 18% onsite, 82% desktop. Moving forward into the new financial year and with restrictions easing, we envisage at least 50/50 split of desktop and onsite work to be carried out. All inspections were consistently scored against the Pennington Choices Audit criteria, which is detailed within Appendix A of this report. A data summary for Pre, WIP and Post audits, are also detailed within Appendix B of this report.

This 2020-2021 Pennington Choices report for the Welsh Governments energy efficiency scheme highlights the managing agent 'Nest's' performance since between July 2020 and March 2021.

The overall 'Pass' results for all inspections completed by Pennington Choices from July 2020 to March 2021 was 99.91%. The pass rate for the last annual report, recording results from October 2018 to March 2020 was 94.69% which was considerably lower. This highlights the need for ongoing quality assurance monitoring, to ensure that when trends such as these are identified, they can be reviewed and subsequently rectified. The details of these results are noted in Table 3.1 'Overview of contract results to date'

Pennington Choices and Nest to hold regular meetings and are in communication monthly. This provides both parties with an opportunity to discuss the inspection results, and enable Nest to provide additional supporting information in regards to the installations. This process ensures that all lessons learned are captured and included within a continuous improvement plan, which in turn will provide assurance to the Welsh Government that the expected levels of service and quality are being achieved.

3.0 INSPECTION OVERVIEW YEAR ON YEAR

Table 3.1 - Overview of contract results to date

Contract Year	Total Pass	Total Audits	Pass Rate %
2018-19	394	399	98.75%
2019-20	373	411	90.75%
2020-21	1055	1056	99.91%
		Overall Pass Rate %	97.64%

4.0 INSPECTION OVERVIEW - YEAR JULY 2020 - MARCH 2021

Table 4.1 - Overall Pass Rate 2020-21

Inspection Rating classified for a PASS Result	Total	%
Passed Inspection & Advisory comments for British Gas NEST	1014	96.02%
Passed Evidence Provided	38	3.60%
Passed Inspection (Documents missing)	3	0.28%
Passed Inspection Warranty Call - Installers/subcontractors to return to the property	0	~
Total	1055	99.91%

The overall pass rate for July 2020 to March 2021 was 99.91%. 1055 audits passed out of 1056, there were 39 remedials/fails highlighted to Nest, one remedial needed to be revisited by Nest contractors. The remaining 38 remedials had sufficient evidence provided to allow Pennington Choices to overturn these audits to passes.

Table 4.2 - Inspections completed 2020-21

Onsite Inspections	Total	% Total
Completed Inspection	1056	~
Passed Inspection / Advisory comments for British Gas NEST	1014	96.02%
Passed Evidence Provided	38	3.60%
Passed Inspection (Documents missing)	3	0.28%
Passed Inspection Warranty Call - Installers/subcontractors to return to the property	0	~
Remedial	36	3.41%
Fail	3	0.28%
Remedial/Failed Inspections - Installers/subcontractors to return to the property	1	0.09%
Total Pass	1055	99.91%

During July 2020 to March 2021 Pennington Choices required British Gas to return to 1 post inspection at a customer property to rectify a remedial measure.

5.0 INSPECTION OVERVIEW - 2020-21

The overall performance of the Warm Homes Programme Managing agent contract has increased. The inspections classed as ‘remedial’ and ‘fail’ have reduced from the last annual report, where the total pass rate was 94.69%.

Remedial actions identified by Pennington Choices inspectors during the inspections, are reported directly to British Gas each month. These findings are discussed in detail between Pennington Choices and British Gas Nest to enable all parties to view any photographic evidence and review any installers/subcontractor notes.

Remedial actions that required the Installers/subcontractors to return are categorised as ‘Remedial’ and ‘Fail’. There is no contractual requirement for a Pennington Choices Inspector to revisit after the remedial works have taken place by British Gas.

5.0 INSPECTION OVERVIEW - DATA RECEIVED - 2020-21

Section 5 of this report details the volume of data received from British Gas and the total number of inspections completed:

- Pre Inspection ‘ratings’
- Work in Progress inspection ‘ratings’ and ‘contractors inspected’
- Post inspections ‘ratings’ and ‘measures inspected’

Table 5.1 - Pre Inspections completed

2020-21	Pre inspection Data Received	Pre Inspections Completed
Total	832	337

Table 5.2 - Summary of Pre Inspection ratings

2020-21	Completed	Pass	Fail
Total	337	337	0
		100%	~

Table 5.3 - Work in progress inspections completed

2020-21	WIP Inspection Required	WIP Inspections Completed
Total	(Quota reached)	0

Table 5.4 - Summary of Work in progress inspection ratings

2020-21	Completed	Pass	Fail
Total	0	~	~
		~	~

Table 5.5 - Post Inspections completed

2020-21	Post Inspection Data Received	Post Inspections Completed
Total	1730	719

Table 5.6 - Summary Post Installation Inspection ratings

2020-21	Completed	Pass/Pass Advisory/Pass Evidence Provided	Pass No Docs	Pass Warranty Call	Remedial	Fail	Genuine Remedial/ Fails
Total	719	714	4	0	36	3	1
%	~	99%	1%	~	5%	0%	0%
Overall Pass Rate % (Pass/Advisory/No Docs/Warranty Call/Evidence Provided)							
99.86%							

36 remedial measures and 3 failed audits were captured at post inspection. Nest provided evidence to Pennington Choices which brought the total down to 1 remedial post inspections. Please refer to Appendix C for more evidence provided information and Appendix D for the details about the 1 remaining remedial inspection.

Table 5.7 - Summary of measures inspected

Measure Inspected	Total	%
Electric Storage Heaters	21	2.92%
Gas Boiler LPG	6	0.83%
Gas Fired Condensing Boilers	619	86.09%
Loft Insulation	26	3.62%
Oil Fired Condensing Boilers	45	6.26%
Solid Fuel Boiler/Biomass	2	0.28%
Total	719	100.00%

Table 5.8 - Installer Summary since contract initiation (Post-inspection audit criteria)

Installer	Pass	Pass (advisory/no documents/warranty call)	Remedial	Fail	Total	Evidence Provided Remedial	Evidence Provided Fails	Pass %
A E Energy Solutions Ltd	23	5	5		33	1		87.88%
A.D. GAS	76	18	12	4	110	12	4	100.00%
AE Insulation	30		4	12	46		7	80.43%
Affordable Warmth	41	3	1		45	1		100.00%
All Round Energy Solutions	19	3	1		23	1		100.00%
AMS Heating	30	2	4		36	3		97.22%
Andrew Roberts Ltd	6				6			100.00%
Anglesey Heating & Plumbing	1				1			100.00%
CA Energy Services Ltd	2				2			100.00%
Chris Allen Plumbing & Heating Services	43	14	9	6	72	6	2	90.28%
CLI HEATING LTD	6	10	1		17	1		100.00%
Cloke Heating Ltd	52	3	1		56	1		100.00%
Colin Laver Heating	12	1			13			100.00%
Complete Heating, Plumbing & Electrical Services	18	5			23			100.00%
Electrical Innovations	13				13			100.00%
Electricare	8	1			9			100.00%
Element Essentials	19	1	3		23	3		100.00%
Elite Plumbing & Heating	132	9	18	1	160	13	1	96.88%
G & S Heating Services	53	13	5		71	4		98.59%
Gary Smith	5				5			100.00%
Gas Gold Limited	8	3	1		12	1		100.00%
Gas Tech (Wales) Ltd	16		9		25	6		88.00%
Greenlands	40	5	5		50	3		96.00%
Haigh Energy Services	2	1	1		4	1		100.00%
HEATFORCE (WALES) LTD	1	4	1		6	1		100.00%
IJF Heating & Plumbing	15	2	6		23	6		100.00%
Ivor R Cook Ltd	39	5	6	1	51	6	1	100.00%
KSB Projects	11				11			100.00%
M P GAS SERVICES	6	1	1		8	1		100.00%

M&M Heating & Plumbing Service Ltd	14	1	1		16	1		100.00%
M.D.B Heating & Plumbing Ltd	27	12	12	2	53	8	1	90.57%
MVR Solutions Ltd	20	6	1		27			96.30%
NuEnergy Solutions	31	1	5		37	4		97.30%
Oil Care (Gwynedd) Ltd	3	1			4			100.00%
Oil Facilities Ltd	33			1	34		1	100.00%
Phillips Price Services Ltd	20	13	8		41	7		97.56%
PHR Plumbing Heating & Renewables Ltd	23	2	1	2	28	1	2	100.00%
Rice Plumbing	12		1		13	1		100.00%
RJW Electrical & Solar	2			2	4		2	100.00%
S E Rowberry Htg & Plg Services	18	4	3		25	2		96.00%
SFS	1				1			100.00%
Spilsbury Plumbing & Heating	18	1	1		20			95.00%
Sustainable Energy	18	8	4		30	4		100.00%
Treforys Gas Solutions	11	1	2		14	2		100.00%
Wall-Lag (Wales) Ltd	4	1	3		8	3		100.00%
Warm Front Limited	3	2			5			100.00%
Total	985	162	136	31	1314	104	21	96.80%

There are three installers performing below 90%. They are Gas Tech (Wales) Ltd 88%, AE Insulation 80.43% and A E Energy Solutions ltd 87.88%. Pennington Choices will continue to monitor their performance.

Appendix A

Pennington Choices Auditing Criteria

INSPECTION TYPE	AUDIT CRITERIA	NOTES AS TO WHY
PRE INSPECTIONS	PASS	Clear Pass
	FAIL	Recommended measures not correct
WORK IN PROGRESS INSPECTIONS	PASS	Clear Pass
	FAIL	H&S issues / No ID cards/ and other issues that the Inspector notes on the WIP audit form.
POST INSPECTIONS	PASS	Clear Pass
	PASS ADVISORY (ONLY TO NOTIFY SCHEME MANAGER OF ANYTHING)	Only use this criteria to notify WW of anything they should be aware of, this is not for any technical issues, may be used to feedback customer satisfaction, for staff, changes by customer to measures fitted, changes of property owner etc.
	PASS NO DOCUMENTS	Documents that are missing at inspection only - this can be Electrical certs, technical survey documents etc.
	PASS WARRANTY CALL	Only use when there is a technical issue with a heating system that the customer advises the system was working at the time of installation and up until the PC inspection - For example system now losing pressure.
	REMEDIAL	Technical issue - the installers/subcontractors must return and rectify- this can be a technical issue for example the measure is not installed as per technical survey document.
	FAIL	The measure is not installed to manufacturer's instructions and does not meet regulations/ needs rectified - the installers/subcontractors must return.

Appendix B

Data Summary

PRE	No. Completed	PASS	Pass - advisory	POST	No. Completed	Pass	Pass - advisory	Pass - no documents	Pass - warranty call	Remedial	Fail	Evidence Provided Rem/Fail
Jul-20	83	83	0	Jul-20	49	48	0	0	0	0	1	1
Aug-20	27	27	0	Aug-20	68	49	17	2	0	0	0	0
Sep-20	32	31	1	Sep-20	65	60	0	0	0	3	2	4
Oct-20	60	60	0	Oct-20	51	47	3	1	0	0	0	0
Nov-20	43	43	0	Nov-20	43	41	2	0	0	0	0	0
Dec-20	16	16	0	Dec-20	77	64	9	0	0	4	0	4
Jan-21	51	51	0	Jan-21	141	121	0	0	0	20	0	20
Feb-21	25	25	0	Feb-21	124	116	0	0	0	8	0	8
Mar-21	0	0	0	Mar-21	101	100	0	0	0	1	0	1
Total	337	336	1	Total	719	646	31	3	0	36	3	38

Appendix C Initial Fail / Remedial Evidence Provided Summary

UPRN	Month	Contractor	Measure	Evidence Provided	Auditor Notes	Contractor Response
163998	Dec	AMS Heating & Plumbing Ltd	Boiler Replacement	O/T - Was Remedial	Gas meter does not look secure	APPEAL Existing pipework .AMS contacted gas supplier to fit a wall bracket customer refused to have shelf fitted.
166253	Dec	IJF Heating & Plumbing	Boiler Replacement	O/T - Was Remedial	Gas Meter not secure to building and no earth bonding at meter	APPEAL Gas Meter fine its fitted on the floor not freestanding .Combi to Combi with safety advice note left maintenance only for MEB
167104	Dec	NuEnergy	Boiler Replacement	O/T - Was Remedial	Commissioning date missing on benchmark. Gas pressure at boiler on a Ideal logic 30 should be at least 18mbar	APPEAL Dates completed on paperwork. Manufacturers stat you are allowed 1.5mbar across the test point so this reading would be correct. Please see chart att
168009	Dec	NuEnergy	Boiler Replacement	O/T - Was Remedial	Gas pressure at boiler on a Ideal logic 30 should be at least 18mbar	APPEAL Dates completed on paperwork. Manufacturers stat you are allowed 1.5mbar across the test point so this reading would be correct. Please see chart att
171603	Feb	Elite Plumbing & Heating	Boiler Replacement	O/T - Was Remedial	No Benchmark.	Appeal Benchmark completed - see presentation
169846	Feb	Elite Plumbing & Heating	Boiler Replacement	O/T - Was Remedial	No Benchmark.	Appeal - Benchmark completed - see presentation
171477	Feb	G & S Heating & Plumbing Ltd	Boiler Replacement	O/T - Was Remedial	No Meter Bracket Fitted	Appeal - Meter has a bracket - see presentation
168783	Feb	G & S Heating & Plumbing Ltd	Boiler Replacement	O/T - Was Remedial	Meter not secured to building.	Appeal - No Bracket required , meter stable see attached note
171509	Feb	M&M Heating & Plumbing Services Ltd	Boiler Replacement	O/T - Was Remedial	No Meter Bracket Fitted	Appeal - No Bracket required , meter stable see attached note

169950	Feb	M.D.B Heating & Plumbing Ltd	Boiler Replacement	O/T - Was Remedial	No Meter Bracket Fitted	Appeal - No Bracket required , meter stable see attached note
171551	Feb	Sustainable Energy (Heating)	Boiler Replacement	O/T - Was Remedial	No Meter Bracket Fitted	Appeal - Meter has a bracket - see presentation
172049	Feb	Treforys Gas Solutions Ltd	Boiler Replacement	O/T - Was Remedial	No Benchmark	Appeal - Benchmark completed - see presentation
166942	Jan	Treforys Gas Solutions Ltd	Boiler Replacement	O/T - Was Remedial	no electrical bonding visible at gas meter from photo	APPEAL- Existing Bonding at high level above meter. Earth Clamp replaced see attached presentation
157474	Jan	Elite Plumbing & Heating	Boiler replacement	O/T - Was Remedial	UNABLE TO VISUALLY CHECK GAS METER, PEB AND RADIATORS AS NO PHOTOS ATTACHED	APPEAL - Like for Like Boiler Change. No need to up grade earth bond. Left card see presentation
158161	Jan	Element Essentials Limited	Boiler Replacement	O/T - Was Remedial	no electrical bonding visible at meter from photo, photo not available of radiator	APPEAL - Like for Like Boiler Change. No need to up grade earth bond. Left card see presentation
158616	Jan	M.D.B Heating & Plumbing Ltd	Boiler Replacement	O/T - Was Remedial	electrical bonding at meter positioned after first tee	APPEAL - Like for Like Boiler Change. No need to up grade earth bond. Left card see presentation
159134	Jan	A.D. GAS	Boiler replacement	O/T - Was Remedial	NO VISIBLE ELECTRICAL BONDING AT METER IN PHOTO	APPEAL - Like for Like Boiler Change. No need to up grade earth bond. Left card see presentation
159462	Jan	Element Essentials Limited	Boiler replacement	O/T - Was Remedial	UNABLE TO VISUALLY CHECK ALL RADIATORS AND MOTORISED VALVE AS NO PHOTOS ATTACHED	APPEAL - Pictures attached see presentation.
160678	Jan	Element Essentials Limited	Boiler Replacement	O/T - Was Remedial	Electrical bonding at meter looks from the photo that its positioned after first tee.	APPEAL - Like for Like Boiler Change. No need to up grade earth bond. Left card see presentation
164371	Jan	S.E. Rowberry Heating & Plumbing	Boiler Replacement	O/T - Was Remedial	No meter bracket fitted	APPEAL - Bracket not required meter is stable. Meter unions on the meter pre-date meter brackets.
164655	Jan	Greenlands Heating	Boiler Replacement	O/T - Was Remedial	no visible earth bonding at meter	APPEAL - Like for Like Boiler Change. No need to up grade earth bond. Left card see presentation

165053	Jan	G & S Heating & Plumbing Ltd	Boiler Replacement	O/T - Was Remedial	No electrical bonding visible at meter from photo, minor electrical work and commissioning/completion report certificates have the wrong property number recorded (number 99)	APPEAL - Like for Like Boiler Change. No need to upgrade earth bond. Left card see presentation. Number has been amended.
166135	Jan	Elite Plumbing & Heating	Boiler Replacement	O/T - Was Remedial	electrical bonding not visible at meter from photo.	APPEAL - Like for Like Boiler Change. No need to upgrade earth bond. Left card see presentation
166274	Jan	Gas Gold Ltd	Boiler Replacement	O/T - Was Remedial	no visible electrical bonding at meter from photo	APPEAL - Like for Like Boiler Change. No need to upgrade earth bond. Left card see presentation
166672	Jan	Elite Plumbing & Heating	Boiler Replacement	O/T - Was Remedial	electrical bonding not visible on photo at meter	APPEAL - Like for Like Boiler Change. No need to upgrade earth bond. Left card see presentation
167548	Jan	AE Energy Solutions Ltd	Boiler Replacement	O/T - Was Remedial	Gas inlet pressure not recorded on Benchmark.	* Unable to gain access. Customer not replying to phone calls. Letter sent we will keep you updated.- Appeal - Now provided evidence within time frame
168032	Jan	Elite Plumbing & Heating	Boiler Replacement	O/T - Was Remedial	No electrical bonding at meter visible from photo	APPEAL - Like for Like Boiler Change. No need to upgrade earth bond. Left card see presentation
168520	Jan	Greenlands Heating	Boiler replacement	O/T - Was Remedial	ELECTRICAL BONDING NOT VISIBLE IN PHOTO AT GAS METER	APPEAL - Bonding is just outside meter cupboard within 600mm. See Presentation
168701	Jan	NuEnergy Solutions Ltd	Boiler Replacement	O/T - Was Remedial	Benchmark not in desktop folder.	* Unable to gain access. Customer not replying to phone calls. Letter sent we will keep you updated. - Appeal - Now provided evidence within timeframe
168978	Jan	NuEnergy Solutions Ltd	Boiler Replacement	O/T - Was Remedial	17.5 mbar on Benchmark , should be 18mbar at least.	APPEAL - MI's States 17.5MB is ok on 24KW Boiler. See Presentation
169272	Jan	Sustainable Energy (Heating)	Boiler replacement	O/T - Was Remedial	No Meter Bracket Fitted	APPEAL - Bracket not required meter is stable. Meter unions on the meter pre-date meter brackets.
169321	Jan	Greenlands Heating	Boiler Replacement	O/T - Was Remedial	No electrical bonding visible at meter from photo,	APPEAL - Like for Like Boiler Change. No need to upgrade earth bond. Left card see presentation
164816	July			O/T - Was Fail	No clip on the flue before it goes into the loft. Required after any change of direction on the 1st meter of the flue run.	There was a clip fitted above the ceiling in the loft, picture attached. The contractor has been back and installed another clip above the boiler for safe measure. This fail should be cancelled. Photo and Explanation provided.Also installer has been back and fitted an additional clip above boiler.

157221	Sept	PHR Plumbing Heating & Renewables Ltd	Boiler replacement	O/T - Was Fail	Contractors Postcode Missing off Benchmark & Gas and Condensate pipework both under doorway. Both pipes can break if stepped on. Needs to be protected within a step. - Fail	Do not agree - Gas pipe & condensate in existing positions, condensate upgraded in same position, installers full address on MI - post code added - installers have returned to the property to add postcode to commissioning docs and cover pipework in step with concrete
159862	Sept	PHR Plumbing Heating & Renewables Ltd	Boiler replacement	O/T - Was Remedial	Electric cable from boiler looks as if its just dangling down and not clipped back. - Remedial	Do not Agree, cables secured within the controls, but we have been back to clip
160659	Sept	Elite Plumbing & Heating	Boiler replacement	O/T - Was Remedial	Condensate pipework looks like overflow through wall to elbow on outside and then into proper pipework. - Remedial	Do not agree - Condensate discharging in to bath waste next to boiler cupboard, hence non return valve.
162037	Sept	PHR Plumbing Heating & Renewables Ltd	Boiler replacement	O/T - Was Fail	Electric socket and connection just dangling in the air. - Fail - Has this been fixed? Dangerous.	Do not agree - Customer informed at survey stage to remove and refit boxing under boiler, customer has completed the reinstatement
170279	March	A.D. GAS	Boiler Replacement	O/T - Was Remedial	No electrical bonding visible at gas meter from photos & From the photos the flue looks too close to the vented eaves. Soffit kit advised to be fitted.	APPEAL - Like for Like Boiler Change. No need to upgrade earth bond. Left card Flue is not to close to soffit / Vented Eaves . Flue is fitted to MI's and a board is fitted above as photo

Appendix D

Remedial/Failed Remaining

The below table displays a summary of the 1 remedial remaining from the post inspections.

UPRN	Month	Audit Type	Contractor	Measure	Score	Notes	Contractor Response
156514	Sept	Post - Desktop	Elite Plumbing & Heating	Boiler replacement	Remedial	Bonding needs to be before First "T" on pipework from meter - Remedial	Bonding existing on gas pipe, installers have returned and moved bonding to before first "T" after meter

Agenda Item 2.9

Y Gweinidog Cyfiawnder Cymdeithasol
Minister for Social Justice



Llywodraeth Cymru
Welsh Government

Huw Irranca-Davies MS
Chair
Legislation, Justice and Constitution Committee
Senedd Cymru

seneddljc@senedd.wales

20 April 2022

Dear Huw,

I write to inform you of further changes to the Police, Crime, Sentencing and Courts Bill ("the Bill"), and to outline our response.

On 28 March 2022 the Bill was once again debated in the House of Commons, following amendments tabled by the UK Government on 24 March. A further debate was held on these amendments in the House of Lords on 31 March.

Amendments accepted by the House of Lords on 31 March

Food Crime

The UK Government tabled amendments enabling certain policing powers under the Police and Criminal Evidence Act 1984 to be conferred on food crime officers of the Food Standards Agency and other authorised persons for the purpose of tackling food crime.

Hate Crime

The UK Government tabled a new clause placing a duty on the Secretary of State to prepare and publish a response to the relevant recommendation in the Law Commission's report 'Hate Crime Laws'.

This follows the so-called 'Newlove amendment' in relation to making misogyny a hate crime. The Commons voted to reject the Newlove amendment on 22 February, but the UK Government tabled this new amendment in response.

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Clauses that are subject to further debate

UK Government sought to make further amendments to the 'Imposing conditions on public processions', 'Imposing conditions on public assemblies' and 'Imposing conditions on one-person protests' clauses of the Bill. The changes mean the threshold for the police to prevent or deal with a protest has now increased, meaning that in order to take action the police need to now show the protest may cause a person to suffer alarm or distress, as opposed to serious unease, alarm or distress.

The amendments will go back to the House of Commons where they will be debated on 25 April, followed by further consideration by the Lords on 26 April.

Welsh Government approach to the latest amendments

As you are aware, Standing Orders require a Legislative Consent Memorandum to be laid "normally" within two weeks of the tabling of UK Government amendments, in this case by 7 April.

I am sure you will recognise that these amendments are not being raised under 'normal' circumstances. It is very unusual to have substantive amendments this late in the legislative process. The Senedd has already voted on four motions concerning this Bill, making its position clear on the policy issues under consideration.

Although we are continuing to make the views of the Senedd known to the UK Government, the timings around Easter recess mean there is no further opportunity for the Senedd to hold another meaningful debate to indicate its view in relation to this Bill in time to influence its outcome.

Given the significance of the Bill I have today laid a [written statement](#) setting out the amendments which have been made. This written statement reaffirms the Welsh Government's position on the amendments, but also highlights once more the votes of the Senedd on the amendments which fall within competence.

I am copying this letter to all Members of the Senedd and Jenny Rathbone MS as Chair of the Equality and Social Justice Committee.

Yours sincerely,



Jane Hutt AS/MS

Y Gweinidog Cyfiawnder Cymdeithasol
Minister for Social Justice

Agenda Item 2.10



20th April 2022

Ms Jenny Rathbone MS
Chair of the Equality and Social Justice Committee
Welsh Parliament
Cardiff Bay
CF99 1SN

Centrica plc
4 Callaghan Square
Cardiff
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www.centrica.com

Dear Ms Rathbone,

Thank you for the opportunity to contribute to the Committee's inquiry into Fuel Poverty and the Warm Homes Programme.

The Committee's inquiry comes at a very difficult time for households, amid historically high energy prices and against the unprecedented challenges of the Covid-19 global pandemic. Our priority throughout this time has been to support our customers, including through our role delivering the Warm Homes Programme. We are incredibly proud of our association with the programme – which, in 2020-2021, provided free, impartial advice to more than 15,557 people; with improved home energy efficiency for 4,559 households across Wales; making a big difference to bills and helping people become more resilient to energy price increases. Amid the ongoing cost of living crisis, delivery of the Nest Scheme is more important than ever.

Let me respond to your questions in turn below.

What are the main lessons learned from the Welsh Government's current Warm Homes Programme?

In 2020-2021, Nest home energy efficiency improvements have delivered a modelled energy bill saving of £305 per household per year, making a huge difference to fuel poor customers. We would like to see these benefits extended further as we work to support delivery of the Welsh Government's fuel poverty strategy. For example:

- Boiler repairs – This should not be limited to one repair only. There could be an extended warranty period for boiler repair e.g., 5 years, where the customer would get a service each year. As part of this we could look at installer filters and control.
- Customers should be able to benefit from multiple applications where required. For example, if a heating measure has been installed in the last 12/24 months, customers could benefit significantly from now having solar PV/battery.

How can these lessons help shape the next iteration of the Warm Homes Programme to ensure that it better supports those living in, or at risk of, fuel poverty?

- As mentioned above, the current cost of living crisis, including energy costs, means that the value of this programme will be of more importance to households than ever before. It is right therefore that we take stock about how we best target that support. In our view, the Warm

Homes Programme should continue to play a key role in delivering the Welsh Government's fuel poverty programme. We know that better targeting of support in recent years has meant that in 2020-2021 more than 16% of households benefiting through the scheme were living in severe fuel poverty, and 35% in fuel poverty. The scheme is delivering in line with the Welsh Government's principled approach of helping those worst affected by fuel poverty first.

- Given the evolution of technologies and solutions, particularly those which support tackling climate change, we believe in the longer term it may make sense for the programme to trial new solutions that could help households.
- By increasing the threshold at which we have to improve energy efficiency measures at customers properties, it would allow customers to benefit from some of the low carbon measures to work alongside their existing / fuel types and reducing the amount of customers fuel bills for example, Solar PV / Battery Storage could be installed alongside gas /electricity / oil. This would help householders who are experiencing fuel poverty in rural areas.

What should the eligibility criteria for home energy efficiency measures be - what specific support should be made available to meet the challenges associated with rural fuel poverty?

- Some households in fuel poverty are restricted by the rules of the scheme. Our experience delivering suggests the scheme should be extended to:
 - people over 70 years of age, who are not on means tested benefits, but who have limited financial capacity.
 - Low-income families who again are above the means tested benefits thresholds but have limited income
 - War veterans who hold a war pension
- We believe that the schemes that are means tested benefits should have one clearly defined set of rules.
- The thresholds / values should be evaluated on a regular basis as opposed to the duration of the scheme.
- We believe that means tested benefit route should also be opened up to properties who have a SAP rating of D in line with the health pilot. Currently approx. 7-10% of means tested benefits customers are currently failing the qualification criteria when applying for the scheme.
- We would also like to see an increase in the provision for private rented properties. Whilst acknowledging landlord responsibilities, these tenants without assets are amongst the most vulnerable.
- To increase targeting to those households most in need, focus could be limited to certain council tax bandings (e.g. A-D). Many properties are benefiting from the scheme currently are asset rich.
- And working tax / child tax credit could assess joint total household income for the property, not focused on an individual.

The Auditor General's report on the Warm Homes Programme highlighted concerns regarding the monitoring of contract arrangements including: - significant differences in how much the two scheme managers charged the Welsh Government to supply and fit the same energy efficiency measures; and - gaps in, and inaccuracy of, management information.

- All of the current prices submitted by Nest were reviewed and approved by the Welsh Government at the time of Tender submission for Nest 2.

The EST also indicated that their role was to take people as far as confirming their eligibility for the Nest scheme and then referring them forward. Could you provide us with information on any systematic support that was offered to assist people through the process from that point?

- EST also provide full support to customers in line with the support identified and link in with relevant partners, for example Care and Repair to ensure that the support is delivered. In 2020-2021 contract year EST delivered advice to 15,500 customers through the Nest scheme.

I hope that this information is helpful to the committee. If there is anything further that we can assist with at this time please let me know.

Yours sincerely,

David Morgan
Wales Public Affairs Manager Centrica

Jenny Rathbone MS
Chair of the Equality and Social Justice Committee
Welsh Parliament
Cardiff Bay,
Cardiff,
CF99 1SN
SeneddEquality@senedd.wales

20 April 2022

Dear Jenny,

I welcome the opportunity to provide information in support of the Equality and Social Justice Committee's short inquiry looking at the experiences of migrant women which sits as part of a broader piece of work on gender-based violence, domestic abuse and sexual violence.

I have addressed the Committee's areas of interest as requested in your letter dated 1st April below

We fund VAWDASV regions and specialist services to provide invaluable and lifesaving support to all victims of VAWDASV, this includes early intervention, preventative and educational support, perpetrator intervention programmes, Independent Domestic Violence Advocates for high risk victims as well as therapeutic recovery interventions for the ongoing support of those impacted by VAWDASV. This funding ensures that no matter where a victim lives in Wales, there is a strong public and specialist service ready to help.

I am aware, multi-year grant awards have been called for by third sector organisations working in the VAWDASV sector for years. Welsh Government's Grant Centre of Excellence has confirmed that strategic policy direction will be changing and therefore VAWDASV Grants will also be aligning to move to multi-year grant awards from the financial year 2023-2024.

Going forward, all competitive grants can, unless Ministers or other factors dictate otherwise, be awarded for **up to 3** years, with a benchmarking exercise to assess performance at the end of that period. Subject to the outcome of the benchmarking the grant scheme can, if required, then be extended for a further 3 years.

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

In practice this will mean:

- Where possible, a move away from the practice of awarding grants for one year only;
- An end to re-competing grants each year which is administratively burdensome for both grant managers and recipients alike;
- Introduction of a benchmarking exercise at the end of the initial period of a competitive grant scheme which will determine whether organisations receive additional funding allowing a longer duration for the grant scheme;
- A greater focus on monitoring, engagement with recipients and outcomes as well as outputs.

VAWDASV officials are currently consulting, working closely with Welsh Government's Grant Centre of Excellence, to explore how we might implement and shape guidance in relation to the proposed changes to the duration of grant schemes and the introduction of benchmarking as a means of potentially extending grant schemes from 2023 onwards.

Welsh Government's Programme for Government commits to **strengthening the VAWDASV Strategy to include a focus on violence against women in the street and workplace as well as the home** in order to make Wales the safest place in Europe to be a woman. The VAWDASV indicative revenue budget for 2022-2023 is £7.875 million, which includes additional PfG allocation of £1.050m to support implementation of the new VAWDASV strategy for 2022-26.

The draft Strategy, which was available for public consultation between 7 December 2021 and 7 February 2022, was developed in discussion with a Working Group of partner organisations. As part of the consultation process, our partners facilitated focus groups, workshop sessions and other engagement with their staff, networks and service users to ensure the survivor voice could be heard during the consultation. Over 120 responses to the consultation were received from across the public, private and the third sector, as well as from individuals who are VAWDASV survivors or whose lives have been directly impacted by VAWDASV.

The Strategy will be delivered through a Blueprint approach, which will bring together devolved and non-devolved organisations, as well as strengthening the partnership between public, private and specialist sectors. This approach will ensure that discussion on actions to deliver against the Strategy continue.

My officials are currently completing their analysis of the responses and using this information to finalise the 2022-2026 VAWDASV National Strategy, due for publication late spring 2022.

The Strategy consultation proposed a subgroup on commissioning of VAWDASV services to further assist our work in planning for sustainability and longevity of funding within the sector. The group would also play a key role in delivering the priorities set out around commissioning as part of the new VAWDASV National Strategy 2022-2026. These include:

- Re-purposing the VAWDASV National Advisors Commissioning Group to form the sub-group of the National Partnership Board and establish a new collaboration and accountability framework which sets out the relationships between the National Board, Regional and Local structures as well as with Regional Partnership Boards to ensure planning and commissioning delivers against the national framework and provides sustainable, quality services.

- Developing a model for local and regional engagement to inform planning and commissioning, and
- Establishing a standards framework to establish the fundamentals of a service offer for commissioned services, drive quality and sustainability of service provision.

I look forward to discussing further with the Committee on 20 June.

A handwritten signature in black ink that reads "Jane". The signature is written in a cursive style with a long horizontal stroke above the first letter.

Jane Hutt AS/MS

Y Gweinidog Cyfiawnder Cymdeithasol
Minister for Social Justice

Jane Hutt MS
Minister for Social Justice

Dear Jane,

1 April 2022

Violence against women, domestic abuse and sexual violence (VAWDASV)

The Equality and Social Justice Committee has launched a short inquiry looking at the experiences of migrant women which sits as part of a broader piece of work on gender-based violence, domestic abuse and sexual violence. The decision to focus our work in this area was informed by a Roundtable session held on 14 March during which we heard a number of issues regarding funding and arrangements for the next iteration of the Welsh Government's strategy. Full details of our work are available on the [inquiry homepage](#).

A key theme identified during our roundtable session was the extent to which public services and third sector organisations have clarity and certainty around the funding of specialist services to support victims of domestic abuse and sexual violence, and subsequent gaps in this provision. Stakeholders noted in particular the detrimental effect that a one-year funding cycle can have on the ability to plan work and retain staff. Following this feedback, I would be grateful if you could respond to the following points, which will help to inform our forthcoming work:

- whether the Welsh Government plans to offer multi-year grant awards to third sector organisations working in the VAWDASV sector, enabling them to make better use of their resources and plan over the longer term;
- what information would organisations in the VAWDASV sector have to provide to the Welsh Government in order for second and third year funding to be released;
- following confirmation of Budget allocations for Violence against Women, Domestic Abuse & Sexual Violence, please could you provide details of the level of funding the Welsh

Government will assign to support implementation of the new VAWDASV strategy for 2022-26; and

- the timescales for publication of the new strategy on VAWDASV and your approach to consulting on the strategy when available.

Finally, I would like to invite you to give evidence to the Committee on our short inquiry on migrant women in the Summer term. The clerks supporting the Committee will liaise with your officials on the details.

Yours sincerely,

A handwritten signature in black ink on a light yellow background. The signature reads "Jenny Rathbone" in a cursive, flowing script.

Jenny Rathbone MS

Chair of the Equality and Social Justice Committee

Welsh Parliament

Croesewir gohebiaeth yn Gymraeg neu Saesneg.

We welcome correspondence in Welsh or English.

Agenda Item 4

By virtue of paragraph(s) vii of Standing Order 17.42

Document is Restricted

Agenda Item 5

LEGISLATIVE CONSENT MEMORANDUM

BRITISH SIGN LANGUAGE BILL

1. This Legislative Consent Memorandum is laid under Standing Order (“SO”) 29.2. SO29 prescribes that a Legislative Consent Memorandum must be laid, and a Legislative Consent Motion may be tabled, before Senedd Cymru if a UK Parliamentary Bill makes provision in relation to Wales for any purpose within, or which modifies the legislative competence of the Senedd.
2. British Sign Language Bill (“the Bill”), a Private Members’ Bill, was introduced in the House of Commons on 16 June 2021 and House of Commons Committee Stage concluded on 23 February 2022. The Bill as agreed Commons Committee Stage at can be found at: [newbook.book \(parliament.uk\)](https://www.newbook.book.parliament.uk)

Policy Objectives

3. The stated policy objectives of the Bill are to promote and facilitate the use of British Sign Language. British Sign Language is the primary form of communication for nearly 90,000 residents of the United Kingdom, with around 150,000 users in total. Its vocabulary and syntax do not replicate spoken English and, particularly where individuals have been Deaf from birth or early childhood, subtitles or written English are not an adequate alternative as British Sign Language is not a signed version of written or spoken English. Many Deaf British Sign Language users have a lower reading comprehension age than the general population, and users in the United Kingdom can face social exclusion as a direct result of linguistic exclusion, adversely affecting employment, education, and access to healthcare.
4. British Sign Language was recognised as a language in its own right by a Written Ministerial Statement to the House of Commons on 18 March 2003 by the then Secretary of State for Work and Pensions, Mr Andrew Smith MP. This sought to place British Sign Language on a similar level to many indigenous languages in the United Kingdom as recognised by the

Council of Europe's Charter for Regional of Minority Languages¹.

5. The Equality Act 2010 requires 'reasonable adjustments' to be made by a wide range of people and sectors. Public sector organisations may, therefore, be required to make use of British Sign Language in certain circumstances. Public sector organisations may also consider the use of British Sign Language in relation to the Public Sector Equality Duty (PSED).
6. The Bill seeks to help to promote and facilitate the use of British Sign Language by providing legal recognition, whilst preserving the architecture of the Equality Act 2010.

Summary of the Bill

7. The Bill is a UK Government backed Private Members' Bill introduced by Rosie Cooper MP. The content of the Bill has been revised from its original long title with the agreement of the sponsoring MP.
8. The Bill consists of four clauses:
 - (i) Recognising British Sign Language as a language of Great Britain in its own right;
 - (ii) A duty on the Secretary of State for Work and Pensions to report on the promotion of British Sign Language in Ministerial Departments;
 - (iii) A duty on the Secretary of State to issue guidance on the general promotion and facilitation of British Sign Language; and
 - (iv) The extent of the clauses and when the provisions will commence.

Provisions in the Bill for which consent is required

9. The following provisions of the Bill are within legislative competence of the Senedd:
 - Clause 1: Declaration recognising British Sign Language as a language of England, Wales and Scotland. The purpose of this
-

provision is the encouragement of equal opportunities which falls within devolved competence and is linked with new duties on the Secretary of State for Work and Pensions to meet certain obligations set out in Clauses 2 and 3.

- Clause 2: The duty of the Secretary of State to report on British Sign Language. The duty relates to the preparation and publication of a report on what United Kingdom Government Departments have done to promote and facilitate the use of British Sign Language in their public communications.

- Clause 3: The duty of the Secretary of State to issue guidance on the use of British Sign Language. The guidance will focus on;
 - How Government departments will comply with the request to report set out in Clause 2
 - Information on best practise for communicating with British Sign Language users

Subsection 3(3) provides that the guidance must not include advice or material which relates only to Wales and does not relate to reserved matters.

10. All the provisions relate to the 'equal opportunities' reservation in Schedule 7A of the Government of Wales Act 2006 but fall within the exception of the 'promotion of equality of opportunities'. We therefore consider these provisions, to be within the legislative competence of the Senedd. As such, it is considered the legislative consent of the Senedd is required in respect of all of the above provisions.

Reasons for making these provisions for Wales in the British Sign Language Bill

11. The promotion of equal opportunities is a duty that falls to both the UK Government and the Welsh Government. The Welsh Government formally recognised British Sign Language as a language in its own right in January 2004, but this does not have legal effect. The Bill does not affect the operation of any enactment or rule of law and it does not place any obligations on the Welsh Government or other devolved Welsh Authorities. The provisions in the Bill will benefit the people of Wales by facilitating the use of British Sign Language by United Kingdom Government departments, who exercise their reserved functions in Wales. The Bill gives legal effect to British Sign Language as a language in Wales through

imposing duties and obligations on reserved authorities and there would be nothing to prevent the Senedd from legislating in a similar way to impose similar duties and obligations on devolved Welsh Authorities.

Financial implications

12. There are no financial implications for the Welsh Government and Senedd as a result of this Bill.

Conclusion

13. It is my view that it is appropriate to deal with these provisions in this UK Bill as the Bill's promotion of equality of opportunity is commensurate with our own position and offers no direct interference with devolved functions. I therefore recommend the Senedd gives its consent to these provision being included in the Bill.

Jane Hutt MS

Minister for Social Justice

8 March 2022

By virtue of paragraph(s) vii of Standing Order 17.42

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