



Comments from Natural Resources Wales on the Regulatory Impact Assessment of the Future Generations Bill

Implementing Results Based Accounting (RBA)

This is a requirement of the Welsh Government (WG) remit letter to Natural Resources Wales (NRW). We have started discussions with our Directors and WG colleagues to understand RBA and how it can be used. At this stage, it's our intended way forward as a part of our Programme approach to delivery over the 3 years of the Corporate Plan (CP). The CP will be published at the end of January 2014.

The CP is outcome focussed, having 7 shared outcomes with WG and indicators to show progress, in some cases at the Wales level. We do not estimate any significant additional costs to move to RBA, as we are already on that journey and will build on the external and internal engagement for the development of the CP.

The outcome approach, where we will show how we are making things better for the people and environment in Wales, shows the required behaviours of the Future generations Bill (FG Bill).

Skills audit

When NRW started, a Skills Audit was undertaken of all staff to identify where NRW may have skills or knowledge gaps. This was not driven by the potential requirements of the FG Bill, but was an essential step in establishing a new organisation.

The approach and outcomes do however align to the principles of the FG Bill. Two areas identified from the skills audit were:

- people did not fully understand our strategic direction, and
- there was a lack of clarity on how we intended to develop the integrated (ecosystem) approach to managing the environment and natural resources.

To start to address this, training sessions have been provided on the principles of an Ecosystems approach and during March 2014 a significant proportion of all NRW staff, as part of the internal staff engagement exercise "The Conversation", were introduced to the CP.

These sessions covered the organisations strategic direction and priorities and helped individuals understand how their own personal delivery plan would play a part in delivering this. Both discussion topics advance our engagement with staff to develop behaviours that will be needed as part of the FG Bill, particularly around the integration principle.

Stakeholder engagement workshops/social media campaign

In order to develop its first CP, we decided to run 10 stakeholder events across Wales, before any drafting had begun or a public consultation commenced. These events were designed specifically to engage key stakeholders and gain their views. 130 stakeholders engaged in this way and the feedback was positive. In addition, there were a number of other events that engaged specific sectors such as recreation and access and flood risk. We have also targeted sectors that previously we had limited engagement with e.g. health.

Such wide engagement, recognising cross organisational working, seeing things from a number of perspectives and listening, show behaviours that delivering the FG Bill will require. This way of working is the approach we will adopt as it moves forward and therefore we do not see this as having significant additional administrative burden.

Natural Resources Wales' engagement with Local Service Boards

Additional information for the Regulatory Impact Assessment: Administrative Burden, of the Future Generations Bill (FG Bill).

1. NRW engagement in Local Service Boards (LSBs):

- We currently engage directly with 8 of the 20 LSBs in Wales.
- We are also engaged with various sub partnerships or fora across 16 Local Authorities (LAs). These are predominantly a Local Authorities Environment Partnership or forum, although with some it includes regeneration partnerships. Not all of the environment partnerships have a direct link to or representation on the LSB.
- The level/grade of attendees range from Officer to Strategic Manager and the number of days per year ranges from 2 to 20+. The majority appear to require an average of 10 days full time equivalent (fte) across a range of staff.

2. Our role includes:

- Providing evidence and data to the Needs Assessment.

We have provided Data and input to some LSBs needs assessments. Where we provide data and evidence, is often related to the relationship we have with the LSB. Information provided to date has been predominantly around Flood Risk, Water Framework Directive and Protected or Designated sites. Over time we will be reviewing our provision of data to stakeholders, but currently we produce data packs for each LA. These are used by our staff to inform such assessments. It does not therefore appear that inputting to an additional number of LSBs would incur significant additional resource with respect to data provision. We are already linked in to the LSB Insight data

sharing approach. We currently share some data sets through that route. The datasets that can be shared in this way may increase over time.

- Provide advice at meetings.
- Provide Chair role to some environment partnerships.
- Manage or contribute to specific projects or activities, for example. Air Quality - Neath Port Talbot; Kafka project Monmouth; Clean Streams Swansea.

Examples of engagement:

Monmouthshire: We have been involved at strategic manager level and acted as Chair of Environment Partnership (approx 10 days fte per year). There would also be input from officer level grades to input the Needs Assessment and make a response to the Single Integrated Plan (approx. 3 fte days a year).

Newport: We are involved at Senior Officer level on the Environment Board (approx. 5fte days per year).

Caerphilly: We have Strategic Manager involvement on the Environment Partnership and provide chair role to groups (approx. 10 days fte per year).

Blaenau Gwent: no involvement.

3. Responding to Single Integrated Plan (SIP) consultations:

We have responded to consultations on 13 SIPs.

When responding to SIP consultations, our engagement goes up, particularly at the officer grade. They would manage coordination of input from across the business and produce NRW's response. Estimate 2-3 days per response to each SIP consultation.

4. Conclusion:

From this rough analysis it would appear that for NRW to engage with all current 22 LAs at the LSB it would nearly triple the current level of involvement at this tier. The LSBs are usually attended by the more senior grades.

We have done a very rough estimate of the cost equivalent of this level of increase in attendance and input, based on an average of 5 days per year at the LSB at an average salary of a senior manager (with on costs). This comes out as an approximate cost of £10k per year to NRW.

There is also likely to be an increase in work for lower grades, particularly if we are then engaged in more sub-partnerships or projects coming out of the LSB. For the additional 6 or 7 LAs we may need to engage with at tiers lower than the LSB, this would equate to an increase in resource cost of approx. £4k per year.

The total additional staff cost to NRW of being required to engage with all LSBs would therefore be approx. £10-15k per year.

However, it must be noted that the resource cost is predominantly time and with budget and resource cuts it is unlikely we would have more staff resource. This activity will therefore have to be undertaken at the time expense of something else.

NRW would not consider this an additional administrative burden. However, if LSBs were positioned as the principal partnership for community decision making, we would see LSBs as a key mechanism for delivery of our outcomes and in combination with others partners outcomes, supporting the sustainable development of Wales. We would therefore be aligning and prioritising our resources accordingly.

If the LSB is not positioned in this way, it may be beneficial for us that there remains flexibility in engagement with the LSB process through the FG Bill. For example, a Duty requiring us to input to the Needs Assessment, but flexibility on how much more engagement within the LSB process and activities, to enable this to be determined at the local level. This would enable us to assess where and how to best employ our resource for the delivery of its shared outcomes and maximise its contribution with others to the sustainability of Wales. Working with stakeholders and partners will be essential for us to achieve this. The LSB is a key partnership, but would need to be positioned as the partnership.

If the FG Bill raises the role and status of the LSB and this provides a common approach across Wales to strategic place based engagement, this would be beneficial to us. As outlined above, we would then align our resources to this to support delivery of our outcomes. The key to it working is that the stakes need to be raised so that all relevant organisations prioritise similarly, therefore meaning that some of the other 'levels of engagement are de-prioritised and we use less resource overall. If all players have too much flexibility then we will continue to have a cluttered landscape across Wales of place based engagement and inconsistent approaches.

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