



Llywodraeth Cymru
Welsh Government

Working Together towards a Financially Inclusive Society

Financial Inclusion Progress Report and Forward Look 2018



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INTRODUCTION

The Welsh Government's Financial Inclusion Strategy, published in March 2016, sets out how we aspire to join with partner organisations – both within Wales and at the UK level – in working towards a more financially inclusive society in Wales.

Our vision for Financial Inclusion is for everyone living in Wales to have access to appropriate and affordable financial services, be supported by quality assured information and advice services and have the financial capability and motivation to benefit from the financial services available to them. Welsh Government remains fully committed to this.

The Financial Inclusion Delivery Plan, which covers the period up to 2021, focusses on the practical actions necessary to achieve this vision. It sets out actions against the Strategy's three themes:

- Access to affordable credit and financial services;
- Access to financial information, including debt advice; and
- Building financial understanding and capability.

A Financial Inclusion Steering Group has been established to advise on the development of this Delivery Plan and to review progress in taking forward the actions. Members of the Group are drawn from organisations which will contribute to delivering a number of these actions, along with other partners who can help to develop policy and identify funding opportunities.

Our National Strategy set a central mission of delivering Prosperity for All, outlining what needs to be done to deliver our priorities, how we will join up services and work differently with our partners to have a greater impact. We know that too many people are struggling to meet everyday living costs, with people's incomes increasingly squeezed. So, more than ever, financial inclusion has a vital part to play in improving the well-being of people living in Wales and is central to giving everyone in Wales a fair chance in life, by helping them to understand and exercise their rights and make informed choices.

The Plan is clear about the positive impact financial inclusion activities can have on people of all ages living in Wales. By following the working principles of the Well-being of Future Generations Act, the collaborative delivery of the actions set out in the Plan, which aim to build in preventative solutions whilst dealing with crises, will make a significant contribution to the cross-cutting goals of the Act, but especially contributing to a more equal, resilient, healthier and prosperous Wales.

The Delivery Plan also continues to capture the important role financial inclusion plays in supporting other priorities within Welsh Government, such as the 2015 Child Poverty Strategy, particularly in helping households to increase household income and address the 'poverty premium'; the refreshed Strategy for Older People 2018-2023: the Employability Plan for Wales; and the Strategic Equality Plan 2016-2020: Working Towards a Fairer Wales.

This document provides an overview of some of the key activities that have taken place across Wales since the launch of the Delivery Plan in 2016 and identifies key challenges for 2019. It is intended to provide a snapshot, recognising that not all work carried out by our partners, in delivering a variety of financial inclusion activities across Wales, is able to be captured within this report.

Financial Inclusion in Wales

Where are we now?



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Undebau Credyd
Cymru
Credit Unions
Wales



CREDIT UNIONS

There are 18 credit unions in Wales providing all Wales coverage



Collectively credit unions in Wales have **83,000** members

The combined loan portfolio for Welsh credit unions is **£26m**

There are currently **69,000** adult members across Wales

There are now **140** employers across Wales providing payroll schemes with a credit union

There are currently **14,000** junior members of Welsh credit unions

Members savings of **£40m**

FRONT LINE ADVICE SERVICES



Supports the delivery of specialist advice on issues relating to welfare benefits, debt, financial capability, housing, and discrimination

Responded to over **58,000** requests for information and advice during 2016 – '18

Secured over **£29.6m** in income gains for the people they have supported during 2016 – '18

BETTER ADVICE BETTER LIVES (BABL)



BABL is a Benefit Take Up Campaign delivered nationally across all local authorities by Citizens Advice

For the period 2016 – '18 BABL helped over **42,000** people, bringing in confirmed gains more than **£50m**



COMMUNITY FOCUSSED ADVICE SERVICES

Provides person-centred social welfare advice services to households who tend not to seek the advice and help they need until a problem escalates into a crisis

Responded to over **14,500** requests for information and advice during 2017 – '18

Secured over **£12.5m** in income gains for the people they have supported during 2017 – '18

DISCRETIONARY ASSISTANCE FUND (DAF)



Providing urgent support to people in emergency situations and / or to help most vulnerable remain living in the community.

Between April 2016 and October 2018:

99.9% of in-kind payments for white goods and furniture were made within 2 weeks

100% of emergency payments were made within 24 hours

13,009 in-kind payments for white goods and furniture provided to help remain living / resettle into their homes

97,441 emergency payments provided

£20.980M total awarded as vital support

£15.223M of this awarded for essential household items

£5.757M as emergency payments for food, clothing and heating

596,636 enquiries were made to the DAF, via phone, web or post. This resulted in:
200,742 applications being considered and **110,450** awards being made to vulnerable citizens

DEVELOPMENTS

Theme 1: Access to Affordable Credit and Financial Services

Our vision is for a Wales in which everyone can readily access a range of affordable financial services and products to suit their individual needs, as well as being able to readily access their own money, whether by automated or over-the-counter means.

Wales Affordable Credit Group

Work to end the targeting of high cost credit at those who can least afford it has taken a real step forward in Wales through the work of the End High Cost Credit Alliance founded by actor and activist Michael Sheen, and more recently (July 2018), with the launch of the Wales Affordable Credit Action Group. Neath Port Talbot social housing provider, Tai Tarian, is leading the Wales Affordable Credit Action Group, with input from key partners including Neath Port Talbot Council, Public Health Wales, Neath Port Talbot Council for Voluntary Service, Welsh Government, Toynbee Hall, Credit Unions Wales, Principality Building Society and the End High Cost Credit Alliance.

The new group will look at exploring alternatives to high cost credit and will be testing changes locally in Neath Port Talbot for the purpose of developing models that can spread throughout Wales. It will be integral to the work of the Alliance which is made up of organisations across the UK who collaborate to raise the issues, gather intelligence and take action with a view to taking a systems change approach to the problems of high cost credit.

Supporting Sustainable Development of Rent or Budgeting Accounts

The types of products on the market and offered by credit unions has developed significantly over the past 12 months. The majority of credit unions are now offering their financially excluded clients the option of using pre-payment cards which have current account and budgeting wallet features so they are able to receive monies and pay bills, acting as a transactional account.

To encourage take up and assist those clients that may struggle to afford the fee, some credit unions are subsidising the monthly fee that is charged to the user. The usage of these cards continues to grow, with credit unions actively promoting these to their members. This will be monitored to get a better picture of provision and take up across Wales with potential barriers highlighted which may prevent some financially excluded people using these products.

Access to Transactional Bank Accounts

Since September 2016 banks are legally required to provide EU citizens with access to fee-free basic banking for people who were previously unable to open a bank account. These accounts enable them to receive money and pay bills (there is no overdraft facility). The nine banks that provide these accounts are Barclays, Santander, RBS Banking Group, HSBC, Nationwide, Co-Operative Bank, Lloyds Banking Group, TSB, Clydesdale and Yorkshire Banking Group.

The Money Advice Service (MAS) has developed a fee free basic bank account leaflet which is available to advice providers and members of the public. The leaflet

can be accessed [here](#). There is also a fee free basic bank account hub explaining how to manage this account on the MAS website [here](#).

Bank Closures

The issue of bank closures is very much a concern for Welsh Ministers. Whilst it is recognised that banks will continue to close branches that are not commercially viable, Welsh Government feels that banks have a commitment to mitigate the effects of bank closures in communities across Wales and to ensure the transition is managed so that vulnerable people are not excluded.

In June 2018, a Digital Leaders 'Living in a Digital Age' seminar was held in Cardiff, led by the Welsh Government's Digital Communities Wales programme, in partnership with Cardiff Council. NatWest's Community Bankers spoke at the event covering topics such as being financially fit; banking in a digital world; and raising awareness on how people can protect themselves from fraudsters.

Access to Free to Use Cash Machines

LINK run a programme to ensure that all consumers have free access to cash. It works by subsidising the lowest income areas of the country to ensure that all have at least one free ATM. The subsidy is paid to any low-income area that doesn't have a free ATM within a kilometre distance. This has proven very successful in incentivising operators to provide free ATMs across Wales.

Latest statistics show that as of March 2018:

- **138** of the **185** deprived Super Output Areas in Wales are resolved; and
- **71** of the **256** deprived Output Areas in Wales are resolved.

An increase of 4.3% since June 2017.

LINK has an online mapping tool which enables anyone to look at the ATM provision in their area along with deprivation and ATM coverage which can be accessed here: [Online Mapping Tool](#).

It was recently reported, however, that between the end of January and the start of July 2018, the total number of free-to-use ATMs fell from 54,500 to 53,200. This is partly because people are using cash less due to the rise in popularity of new payment methods such as contactless transactions. The Payment Systems Regulator (PSR) is taking action to ensure LINK meets its commitment to protect the geographic spread of free-to-use ATMs across the UK. It is also seeking renewed commitments from banks that consumers will continue to be offered services, allowing them to access their cash.

Credit Unions

To raise awareness of Credit Unions as a provider of affordable credit, Welsh Government has continued its support for credit unions, providing funding since April 2017 for a marketing campaign, promoting credit unions through social media, which includes developing the website <http://www.creditunionsofwales.co.uk/en/> to optimise use.

£422,334 of Welsh Government funding per annum has been allocated to credit unions to support financial inclusion activities. Part of this funding is being used to support marketing activities including a national PR, Digital Marketing and Social Media Programme. This marketing campaign will be funded until March 2020.

Whilst credit unions are not able to employ the strategies used by door step lenders, they are continuing to increase awareness of credit unions locally. For example, Cambrian Credit Union in North Wales, supported by Welsh Government funding, is taking forward a project which aims to position itself as the best alternative to high cost credit, targeting sectors of society that have the greatest tendency to use high cost doorstep credit and non-standard loan companies. Same day loan decisions are given with applicants not having to save with the credit union in advance of the loan.

Similarly, Smartmoney Cymru Credit Union is actively engaging with residents in areas of Blaenau Gwent known to use high interest lenders and loan sharks. Since summer 2017, Smartmoney has taken their services directly to residents, setting up credit union outreach points on a number of housing estates, due to residents having identified they are more likely to engage with the credit union this way, rather than at their high street premises.

Credit unions are increasingly working to offer quicker loan decisions, some within 24 hours, using improved on-line services, to existing customers and to those who were not previously members of the credit union.

Cambrian Credit Union:

"Having previously had a personal loan with the Credit Union and knowing of their excellent APR rates, both myself and my wife decided to approach the credit union to discuss consolidating our debts. We applied for a loan of £13,000 in order to consolidate everything, which to our delight was approved. The credit union then contacted our creditors direct and paid off our debts. Our monthly outgoings have now been reduced by approximately £260 a month and overall we are actually paying back a lot less than we would have had to have originally paid to our previous creditors. The loan application was easy to complete and the staff were at hand to explain things to us, in a simple way, which both my wife and me were able to understand. A real weight has been lifted and we feel like our finances are now back on track."

The majority of their products can be applied for on-line. Best practice is being routinely shared amongst credit unions via regular managers' meetings and wider via social media, with facebook and twitter advertising specific loan products that credit unions are offering e.g. Newport Credit Unions' Family Loan which is aimed at financially excluded individuals.



[Credit Unions Wales - Twitter](#)



[Credit Unions Wales - Facebook](#)

£1 million (£500k per annum) of financial transactions capital funding over two years has been agreed by Welsh Government to support the sustainability of credit unions. This will help boost the capital of credit unions and ensure they meet the mandatory capital to asset ratios set by the regulator.

Payroll Deduction

A number of payroll development projects, funded by Welsh Government from 2017 – 2020 are being taken forward by credit unions to boost payroll membership. Credit unions have developed a Payroll Partner mark with 140 organisations across Wales signed up, showing their commitment to staff financial wellbeing. Events have been hosted by credit unions to market their services to local employers. Merthyr Tydfil Credit Union recently announced their membership has increased by 25% during 2017/18.

Cartrefi Cymru:

Cartrefi Cymru has recently received Credit Union Payroll Partner Accreditation for supporting the financial wellbeing of their employees throughout Wales. Many of their Rhondda employees have joined Dragonsavers Credit Union in Treorchy and benefit from the Payroll Saving Scheme which encourages them to regularly save or pay off an affordable loan from their salary.

Payroll Officer Denise Hall explained that Cartrefi Cymru used to offer their own financial schemes to employees, including a salary advance or a loan based on salaries, but they now signpost their staff to a wider range of financial products through the local credit union.

Denise said: “We take the financial health of our staff very seriously indeed. Our purpose is to protect vulnerable people in the community and equally we want to ensure our own staff feel protected and supported which is why we encourage them to become financially secure.”

The Discretionary Assistance Fund (DAF)

The Discretionary Assistance Fund provides urgent assistance where there is an identified need to safeguard health and well being. Payments are made to people who have no other means of meeting the immediate cost of living. Since the fund began in 2013/14, it has made over 198,500 awards, with over £42 million paid out in grants to support our most vulnerable people.

During the first seven months of this financial year (April – October 2018) the DAF received over 61,000 applications, which resulted in:

- 28,815 cash awards for Emergency Assistance Payments (EAPs) totalling £1,722,707.39 with almost £495,020 being spent on helping individuals where the main reason for applying is due to struggling with benefit payments; and
- 4,014 Individual Assistance Payments (IAPs) providing essential white goods and household items to aid resettlement or help an individual remain living in the community, totalling £4,474,012.99.

We have seen levels of spend increase over the past 12 months, with a sharp increase in demand from March 2018. Demand continues, with October seeing the highest number of applications received in a single month since the DAF started in 2013. Should demand continue at this level, a total annual grant spend of £10.5million is anticipated. An additional £2million of Welsh Government funding has been agreed for financial year 2019-2020.

Welsh Government has been working to increase the number of successful applications made by accredited partners on behalf of their vulnerable clients.

YMCA Cardiff :

A young person (under 21) had been living in a homeless hostel due to violent family history and family breakdown.

The client had never lived independently before and attended the homeless hostel after sofa surfing for several months. He had no other family to help him. With the support of the YMCA, this client secured his first permanent tenancy in Cardiff. The support worker applied to the Discretionary Assistance Fund for a full resettlement into his first tenancy. The client was in need of all essential items for his first flat as he arrived at the YMCA with absolutely nothing. The client was able to use a kettle and microwave but he had never used a cooker. The award of the microwave enabled the client to make hot meals confidently. The client was also awarded a bed, bedding, fridge, seating, kettle, toaster, cutlery and dining set through the Fund.

“This young person was in desperate need and moving in on his own for the first time was daunting for him. The Fund helped set this client up in his first home and the resettlement items really helped him.”

The DAF is ideally placed to identify households in need of further advice and support. Due to the level of repeat applications for EAPs from individuals and households struggling to meet their home energy needs, two advice providers have been selected to deliver advice, including specialist fuel debt advice for identified individuals living in Rhondda Cynon Taf and Carmarthenshire. Through this pilot ‘resolution and resilience’ project, DAF advisors will identify and refer individuals in need of follow up support from July 2018 through a ‘warm’ referral process, with advice providers contacting the individuals directly.

Theme 2: Access to Financial Information, including Debt Advice

Our vision is for a Wales in which individuals and families are able to better manage their finances through access to good quality financial information and quality assured financial and debt advice, with appropriate signposting taking place to direct people towards the most appropriate source of help.

Advice Services

Social welfare information and advice services have a vital role to play in ensuring everyone in Wales has a fair and equal chance in life, including around the five key priority areas within Prosperity for All. Welsh Government currently directly provides a total of £5.97 million per annum in grant funding to five 'Not for Profit' providers who deliver information and advice on social welfare issues, through three distinct projects: **Front Line Advice Services**, **Better Advice Better Lives** and **Community Focussed Advice Services**.

Front Line Advice Services

Tenovus Cancer Care Advice Service receives funding through the Front Line Advice Services grant to provide holistic advice and support to people living with cancer and to their families. Tenovus reported that 2017/18 saw client numbers and referrals rising to an all time high. This is due to a surge in new referrals from the outreach services that Tenovus run across Wales, along with an increase in the number of referrals from health care professionals and in people self referring. Welsh Government is continuing to support Tenovus to ensure that people can access the advice they need as timely as possible.

Case Study:

A 47 year old female was referred to a Cancer Support Advisor (CSA) as she was refusing life-saving cancer treatment due to concerns that she could not afford to take time off work as she would have no money to look after her 14 year old daughter.

Until the CSA completed a full welfare benefit check the lady was unaware that she would be eligible for financial support from the social security system. Following a benefit check she was advised to claim Universal Credit, Housing Benefit and a Council Tax Reduction and gained a monthly income of almost £800. The CSA also helped her to claim a £500 Macmillan grant.

Accessing the welfare benefit income allowed her to start her course of treatment, confident that she would have the income to pay her household bills etc. while she recovered. The treatment went well and she is hoping to return to work in the near future.

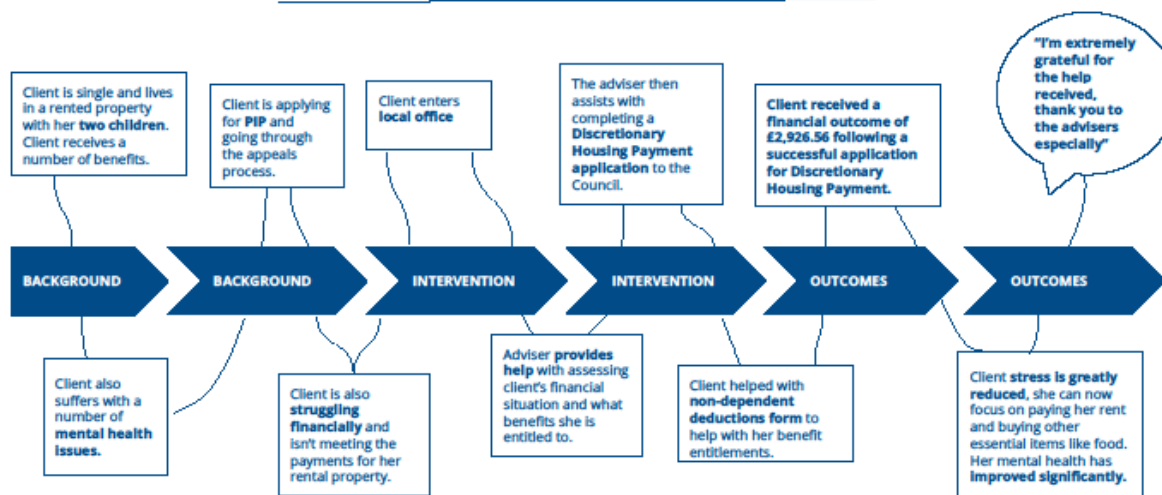
Better Advice Better Lives – Citizens Advice Cymru

During 2017/18, the Better Advice, Better Lives project helped people across Wales to deal with a total of 41,273 welfare benefit and Tax Credit problems. Problems with claims for Personal Independence Payment (PIP) accounted for 32% of the total welfare benefit problems that the project helped people to resolve. There has been a steady increase in the number of people seeking advice and help with problems on Universal Credit claims. Local Citizens Advice Services continue to work closely with a wide range of stakeholders to ensure that people, who do not usually seek the advice that they need until a problem has become a crisis, are aware of all the advice and support they can access through the project. In addition to the GP surgeries and health locations that the project is traditionally delivered from, Citizens

Advice Services are also working closely with Jobcentre Plus, Credit Unions, Food Banks and school uniform exchange schemes.

Advice in Action – Bridgend Citizens Advice

Single mother struggling to make ends meet



This was a client who had many complex issues and had been accessing the Better Advice, Better Lives service for many years. The client has significant mental health difficulties and is treated as a high risk client due to the suicidal tendencies and having two dependent children.

The Better Advice, Better Lives project represented the client at an appeal hearing for her PIP and she was awarded Enhanced rate Daily Living and Enhanced rate Mobility - an increase in income of £141.10 per week (total annualised amount is £7,337.20). She was also referred to the Money Advice Service Debt Advice project at Bridgend Citizens Advice for help with a Parking Enforcement Notice which resulted in the removal of the charge (£388).

Community Focussed Advice Services

Since April 2017, following the phasing out of the Communities First programme, the Communities First Shared Outcomes project continued to help people within the most deprived communities across Wales to improve their financial capability. On a local level, Citizens Advice Services reported that changes had to be introduced with the delivery of the project, as some (Communities First) venues where the project was delivered from, were no longer open or, in some cases, not available to Citizens Advice due to increased rental costs. However, Citizens Advice reported that even though they had to deliver their services through fewer venues, they have delivered more frequent sessions in these remaining venues. In total, over 14,500 participants attended the financial capability sessions with over 6,400 of these being supported to access additional income by claiming the welfare benefits that they were entitled to.

Case Study:

Following separation from her partner, a client was living with her two children aged 4 and 1 in Housing Association rented property. Due to stress and anxiety she did not attend an appointment with the DWP so her Income Support was suspended. She eventually sought help from her local Citizens Advice after receiving a Notice Seeking Possession from her landlord as her Housing Benefit and Council Tax Reduction also stopped as a consequence of the Income Support being suspended. She was also struggling to feed herself and her children.

The individual was advised to make new benefit claim and it also appeared that she had further debts with other companies. The Advisor liaised with Flying Start and Health Visitors to provide practical support such as looking after the children when she had appointments regarding her benefits. In the short term she was able to access her local foodbank.

Following this intervention, she was able to attend appointments and had her benefits reinstated. As they were then backdated, she was assisted with contacting her other debtor and agreeing to a payment plan. This helped with her stress and anxiety and she was referred to Communities for Work who supported her with suitable training to prepare her to return to work when her youngest child started school.

During 2017/18, over **72,600** information and advice enquiries were dealt with by the organisations funded with over **£53.7million** in benefit/income gains for people supported.

Access to Quality Assured Advice Services

The Welsh Government is committed to ensuring that publicly funded information and advice services are quality assured in order to provide the very best service to the people of Wales. In line with this commitment, the Welsh Government produced the Information and Advice Quality Framework for Wales (IAQF).

The Welsh Government has appointed an independent company, MBARC, to take forward work on the implementation and management of the IAQF independent assessment service. This work commenced in January 2018.

The assessment service has been designed and Advice Quality Standard Owners assisted to develop/prepare their standards for IAQF compliance. To assist advice providers attain the accreditation, Welsh Government is recruiting a number of providers to act as pathfinders, applications for which opened in July 2018.

The National Advice Network (NAN) has published a key messages document outlining its principles and encourages all those who are engaged in the provision of social welfare information and advice within Wales to adopt these principles. The key message document can be accessed [here](#).

Information and Advice Services Directory

The Dewis Cymru website is fully operational and can be found [here](#). There are currently over 140 resources registered on the website. We need more providers to register on the system if it is to be used to its full potential by commissioners, funders, providers and service users. A resource which accurately captures the supply of information and advice services is vital to supporting a more integrated, person-centred advice sector.

Signposting Services

NAN and the Welsh Government continue to positively engage with local authority Public Service Board co-ordinators across Wales and the role played by information and advice services in the positive contribution to the objectives within Well-being Plans is becoming more widely acknowledged. All national, regional and local networks across Wales are to be mapped by the NAN and developed further where required.

Council Tax Reduction Scheme

The Welsh Government has been working to tackle low rates of awareness and take-up of the Council Tax Reduction Scheme and the various council tax discounts and exemptions which are available to support households. It has been working jointly with MoneySavingExpert.com – the UK's biggest consumer website – to develop simple and consistent advice to ensure all households in Wales have access to information about their council tax entitlements.

The Welsh Government has dedicated web pages and a simple guide that summarises the key information about the council tax support households can receive. It has also worked with MoneySavingExpert.com to improve communication, particularly about entitlements available to those diagnosed as 'severely mentally impaired'. MoneySavingExpert.com is now calling on the rest of the UK to follow Wales's lead following an investigation it conducted across England, Scotland and Wales last year, which raised concerns about the inconsistent messages households receive on council tax discounts.

Ensuring every household in Wales receives what they are entitled to in terms of council tax support is an important part of the Welsh Government's commitment to making council tax fairer. Our guide brings together all the relevant information and puts it in one place. We are grateful to MoneySavingExpert.com, and local councils, for helping to develop this important and useful guide. Welsh Government will continue to work with councils to encourage and ensure consistency in approaches to administering discounts and exemptions, not just for those with a severe mental impairment, but for everyone who is eligible.

A full list of eligibility criteria is [here](#).

Modelling the need for Advice on Social Welfare Topics

In June 2017, Welsh Government published a needs analysis report which summarises research into the need for social welfare advice within Welsh local authorities. The research provides estimates of the local level of need for general and specialist help on six social welfare topics.

This research was proposed by the NAN and is part of a vision to develop a single strategic approach in the delivery of Social Welfare advice, which sees a network of quality-assured information and advice providers in place to deliver a range of services through coordinated and sustainable funding. Importantly, the NAN advised that this approach should be based on a robust assessment of need, which will help inform the allocation of funding for advice services. The full report can be accessed [here](#).

Money Advice Service (MAS) data shows that over 425,000 people in Wales are regularly behind on payments or they find their debts are overwhelming. Yet less

than 1 in 5 are seeking help. It identifies groups that are of particular risk and percentages of these groups at a local authority level, which will help target preventative services. More details can be found by visiting [overindebtednessmap](#). The MAS has offered this data at LSOA level to the 22 local authorities in Wales to help understand need in the local area and to plan budgets.

Employability Programmes

The Welsh Government works with its own, and partner programmes, which support people into employment, to ensure financial exclusion barriers to entering, and remaining in employment are addressed. For example, Communities for Work (CfW) Employment Mentors and Advisers work with participants to identify and overcome barriers preventing them taking up training or employment. This includes providing support to tackle any financial barriers identified. CfW teams provide in-work financial calculations to understand the financial impact of starting employment. Plus, it is the responsibility of the CfW delivery teams to identify and build effective relationships to enable them to refer participants to local key partners for financial literacy training and advice, manage budgets and overcome any possible debts. These organisations include Citizens Advice, money advice and guidance services and local Credit Unions.

Devolved Debt Advice Funding – Financial Guidance and Claims Act 2018

The Financial Guidance and Claims Act 2018 received Royal Assent on 10 May 2018. This will devolve debt advice funding via the financial levy, which is currently delivered by the Money Advice Service (MAS), following the establishment of the new Single Financial Guidance Body (SFGB). This will help enable a more integrated approach to the commissioning of debt advice services in Wales to be developed, with debt advice services being delivered alongside other areas of social welfare advice funded by the Welsh Government, such as, housing, welfare benefits, and employment advice.

The new body will bring together MAS, PensionWise and the Pensions Advisory Service and is expected to commence operational functions in early 2019. Work is continuing with the Treasury, Department for Work and Pensions and the Money Advice Service to ensure there is a seamless transfer of responsibility for the commissioning of debt advice services to the Welsh Government. Furthermore, Welsh Government is seeking to ensure that Wales is at the heart of the SFGB's governance arrangements to provide influence and to ensure that collaborative working is achieved across debt advice, money/pension guidance and financial capability/education.

Theme 3: Building Financial Understanding and Capability

Our vision is for everyone in Wales to have the financial capability to manage their money well and make more informed financial decisions, whether related to everyday living, planning ahead, when facing unplanned events or in periods of financial difficulty.

The Money Advice Service (MAS)

The MAS Financial Capability Strategy for Wales reports on actions which contribute to the Welsh Government's Financial Inclusion Strategy under 5 key themes – Children and Young People; Young Adults, Working Age People, Older People in Retirement and People in Financial Difficulty. There has been a lot happening across Wales, further information can be found at <http://www.fincap.org.uk/wales-forum> with the actions listed on the right hand side under the 5 themes.

This year's Talk Money Week, formerly known as Financial Capability Week, took place between 12 and 18 November 2018. Organised under the umbrella of the Financial Inclusion Strategy for Wales and the Financial Capability Strategy for Wales, the Wales Talk Money Week brings together a wide variety of organisations and policy makers from across Wales to encourage people to talk about money. It sees organisations such as Credit Unions, Citizens Advice Cymru and the Money Advice Service hold events across Wales to encourage people to talk about money, celebrate the ways they are helping people to develop financial skills and knowledge, and the work they do to ensure there is inclusive and accessible services for the people of Wales.

The theme for 2018 was financial wellbeing, with a focus on what organisations can do to get more people accessing free debt advice, more people saving regularly, more young people receiving a meaningful financial education and less people using credit for every day spending. Over 50 Talk Money Week events took place in Wales, with social media activity from financial services, schools, advice providers and other partner organisations across Wales.

On the 15 November 2018, an event was held at Cardiff Castle to celebrate the delivery of financial capability work across Wales. Various organisations exhibited their work and spoke about what they are doing and why it's important. Participants shared their latest insights, learning from one another and finding new and better ways to change lives through better money management.

Links with the Digital Inclusion Strategic Framework and Delivery Plan

On 18 April 2018 Welsh Government published their Digital Inclusion Progress Report and Forward Look 2018. The Progress Report provides a summary of the important work that has taken place in the two years since publication of the Digital Inclusion Strategic Framework and Delivery Plan. A copy of the report can be found [here](#).

[Digital Communities Wales](#) is working with Lloyds Bank, Barclays and NatWest in a varied capacity across Wales to support sessions for individuals to engage with technology. This includes raising awareness of online fraud and tips on how to ensure people make informed decisions

[The Lloyds Banking Group Consumer Digital Index 2018](#) was published on the 10 May 2018. It benchmarks the digital and financial capability of consumers in the UK and this is the third annual report of its kind. The report looks in detail at the links between financial and digital capability and how greater support could be given. Digital Communities Wales fully recognises this link and continues to tailor support to tackle both.

The figures are derived from a combination of behavioural data of 1 million consumers, a basic digital skills survey of 4,073 people across the UK (of which only 197 relate to Wales) and additional internet banking research with 1,000 people. Key findings included:

- 69% of people in Wales say that using the internet helps them to save money (UK Average 69%).
- 39% of UK adults stating money worries have 'really affected them' at some point, and they suffer from lack of sleep and feelings of anxiety.
- People with a registered disability are 50% more likely to not feel in control of their finances than the rest of the population.
- People without a bank account are more than three times as likely to feel anxious just thinking about money.
- Managing money online can help, with 73% of young people say that being able to access their finances 24/7 helps reduce their financial anxiety

This again reinforces the importance for financial literacy to be delivered as part of basic digital skills training in supporting wellbeing and health.

Financial Capability in all Maintained Education Settings in Wales

A new curriculum is being developed for settings and schools in Wales which will be available for feedback by April 2019. A final version will be available in January 2020, and will be used throughout Wales by 2022.

In December 2017, Welsh Government [published papers](#) outlining an approach to curriculum development and sharing the identification of 'what matters' within the six Areas of Learning and Experiences (AoLEs).

[This paper](#) reflects the AoLE groups' thinking in May 2018 and outlines the proposed development structure for all AoLEs and contains the latest drafts of 'what matters' statements with supporting rationale.

The mathematics and numeracy material published within the update remains under development, in particular financial literacy. The Maths and Numeracy AoLE group, supported by the Welsh Government, believe that financial literacy should be given due prominence in the curriculum and are currently working on how best to achieve that.

The [National Network for Excellence in Mathematics](#) (NNEM) was launched by the Cabinet Secretary for Education on 14 July 2017. The Network, supported with Welsh Government grant funding, has a particular focus on development and delivery of support for teachers in both primary and secondary schools, linked in with our wider work on professional learning opportunities for teachers.

Estyn's review of financial education commenced in September 2016. It examined provision in primary and secondary schools. The report indicates areas of good

practice and outlines recommendations on areas of improvement. Its findings will inform development of the new curriculum. The report was published in July 2017 and can be found [here](#).

Promotion of School Savers Clubs

Working with credit unions, Welsh Government is funding a number of school saver schemes across five local authorities until 2020. This funding will allow a further 33 new school saver schemes to be set up by March 2020, successfully tailoring savings clubs to the needs of the schools, with the most successful method being where children take responsibility for the administration and collection of monies. This includes the development of a School Savings Toolkit to serve as both a strategy and best practice document.

Credit unions are attending pioneer school meetings for AoLEs around numeracy and wellbeing. There are opportunities to develop this as part of a national marketing campaign.

Schools savers schemes complement the evidence outlined in research completed by the Money Advice Service, which emphasises the importance of early intervention with money habits formed by the age of seven. Furthermore, by partnering with schools, credit unions become part of the school community, reaching parents/carers and friends of the school who are also able to benefit from their services.

Examples of this positive relationship can be seen here:

Bridgend Credit Union, Oldcastle School Savers:

Oldcastle is one of seven school savers schemes run across Bridgend County. The scheme started on 24 November 2017 and was promoted through official school channels and social media. The school has donated £2 to every child that has joined, in addition to the piggy banks, books and folders that are provided to each new saver as an incentive. The scheme is run by Damien Faulkner, Bridgend Credit Union, a member of the office staff, with the help of a rotation of year 4 pupils. It's run every Friday and, while parents can come in with their children before school to save, most children save with their class. From experience, the most successful school schemes are embedded within the school day, we start at 8.45am and generally run until 10.30am, with the helpers counting the money and reconciling the deposits at the end.

"We have 236 savers signed up, including a couple of younger and older siblings and staff members. We plan to promote to staff more actively from September 2018 as well as the new nursery in-take (traditionally, the Foundation phase has the biggest response). Since we began the scheme in late November, over £12,600 has been saved with an average of £602.46 saved every week by an average of 98 children. Curve Media recently came into film the scheme for an upcoming BBC series and were hugely impressed with the scheme. We had a full morning with the camera crews, including interviews with one of our savers, our Year 4 helpers, the Head teacher and 2 parents. The programme is due to be aired in January 2019.

Newport Credit Union:

We were contacted by a local school, concerned to hear that one of their pupil's parents had approached a payday lender to help finance their child's school trip. The parent and child were both in distress and the school was looking for support and ways to promote responsible finance to the rest of the parents and wider community. This led to several discussions and we are now attending the school to open their first Young Savers Club, to help promote and educate the children on savings and finances. We will also be attending their school fete and the local community centre open day to talk with parents and the community about their finances and the options available to them at the credit union.

Corporate Social Responsibility

The Principality Building Society has made Financial Education a key aspect of their Corporate Social Responsibility activity. It forms the majority of their work with partner schools through the Business Class programme, delivering things like budgeting workshops, guest lectures on strategy and financial ratios, and have so far supported over 250 pupils to get an extra GCSE in Financial Capability. In addition to these activities, they anticipate helping over 1000 primary school pupils as part of Talk Money Week 2018 with an innovative story book and numeracy based activity sheets.

The Principality has recently committed to a project that will see £50,000 of investment being made into the Carmarthenshire Business Class Cluster. All school partners will receive equal share of the investment to support the provision of the London Institute of Banking & Finance (LIBF) L2 Certificate in Financial Capability and / or the LIBF LiFE qualification.



LifeSkills, created in partnership with Barclays, aims to inspire young people to get the skills they need for a better future. LifeSkills works with teachers, parents and businesses to help young people: [barclayslifeskills](https://www.barclayslifeskills.com).

The financial capability materials developed by the Wales Illegal Money Lending Unit (using money confiscated from loan sharks) continue to be in demand, and have been requested by Gwynedd Council, Action for Children, and the St. Giles Trust (for use in HMP Berwyn). The materials can be found [here](#).

Targeting Parents, Families, Children and Young People

The 'Talk Learn Do' parenting project is a two hour parenting session that has been developed by MAS and is incorporated into two 10-week parenting programmes: Incredible Years and the Family Links Nurturing Programme.

The project was piloted in Wales and the evaluation results show that the project has been well received, both by parents and practitioners. Many of the impacts remain even at the 12 month follow up. Outcomes where an impact has been shown 12 months after delivery are:

- Parents' knowledge on how to talk to their children about money
- Parents reporting their children's ability to handle and manage money
- Parents giving their child pocket money
- Children's ability to manage their own day-to-day money
- Children's ability to recognise the difference between 'want' and 'need'
- Children's ability to save up for a short period of time for something they want
- Children understanding why their parents are saying 'no' to buying something
- Parents believing they should have conversations about money and give children experience of money at young ages
- Talk about the importance of saving
- Involve them in family spending discussions and
- Manage their own day-to-day money
- Parents' discussions with their children regarding the fact that companies try to sell them things in adverts and some TV programmes

- Parents' over-indebtedness.

The full research can be found [here](#).

Youth Cymru launched a well attended event for youth practitioners to launch their new 'money smart' resource funded by the MAS What Works Fund. The resource can be found [here](#). Funded by MAS, Youth Cymru in partnership with ITEC, is running a new financial capability project to explore what works in developing the financial capability of young adults aged 16-24, with a particular focus on peer to peer delivery. Money for Life is also being delivered by Youth Cymru in partnership with UK Youth and The Mix. Youth Cymru train two Youth Workers from each organisation who will then train six Champions aged between 14 and 25.

The MAS What Works programme has been designed to build, gather and strengthen evidence of what works by testing and piloting potential new solutions, scaling up existing financial capability interventions and evaluating existing projects. There were seven projects in Wales including one aimed at single parents, the Youth Cymru project and one in schools. The final evaluations of all the What Works projects can be found [here](#).

Children in Wales are again undertaking their annual Child and Family Poverty in Wales survey (4th year) and will release a report from the findings before the summer. Previous reports can be accessed here:

<http://www.childreninwales.org.uk/resources/poverty/> .

Representatives from Children in Wales were able to share some early headline findings with the Minister for Children, Older People and Social Care at their meeting with him on the 3 May 2018. Issues around the impact of welfare reform, debt and finance once again featured prominently.

In late 2018, MAS will finalise a Children and Young People's Financial Capability Commissioning Plan, which will set out how they believe resources can best be directed to achieve this goal. The analysis reports on [this page](#) will inform MAS's commissioning recommendations. They are the first reports of their kind in the UK, and draw together everything MAS know about children and young people's financial capability needs, how financial education is currently delivered, what is effective in helping children develop financial capability, and the risks and opportunities of the policy context in Wales and each UK nation.

In October 2018 MAS consulted on draft recommendations for how they plan to put all this evidence into action over coming years, before finalising their commissioning plan in the months that follow. The MAS intention is that this will inform the Financial Capability Strategy for Wales (and the UK) for future years, including funding, delivery, influencing, and research activity.

The current Wales mapping from early 2016 can be found [here](#).

Building Financial Understanding and Capability – Regional Projects

Torfaen County Borough Council

Torfaen County Borough Council's Financial Inclusion Service was established to further support the prevention of homelessness, with the primary objective being to sustain tenancies and allow people to remain in their homes through effective budgeting, money management skills and income maximisation. The team assist those in financial difficulty that may have rent or mortgage arrears, utility arrears and other debts. The work undertaken by the Financial Inclusion Service varies greatly, from low level money advice to complex mortgage cases with significant secure and unsecured debts. The Officers negotiate with creditors, provide court advocacy and liaise with landlords on behalf of the service users.

Case Study:

Miss M was referred into the Financial Inclusion Service at crisis point as she was due in court the following week with rent arrears of over £5,000 on her Housing Association tenancy. The Financial Inclusion Officer identified that Miss M also had significant council tax arrears that needed to be addressed urgently. Contact was made with Council Tax to set up a new payment arrangement to prevent further action being taken against the client. The Financial Inclusion Officer also supported Miss M to maintain her claim for housing benefit and make a claim for Discretionary Housing Payment (DHP).

The Financial Inclusion Officer accompanied Miss M to court and the hearing was adjourned for 3 months as Miss M was working with the Financial Inclusion Service and had made payments towards her arrears since a previous court appearance. The Financial Inclusion Officer made numerous applications for monies/grants to reduce the arrears all of which were successful, with a significant reduction in her arrears being realised. Miss M was also supported to increase her rent payment to reduce her arrears due to an improvement in her financial circumstances and being given appropriate support with budgeting to reduce her expenditure. At the court hearing 3 months later a suspended possession order was granted, allowing Miss M to remain in her home subject to her maintaining her repayments against her accrued arrears. The client has been maintaining the repayment agreement and remains at the property with the arrears now significantly reduced from when she was referred for support.

Wales Co-operative Centre – Your Money, Your Home

From 2011, the Wales Co-operative Centre has been delivering their programme - Tackling Homelessness through Financial Inclusion. With a specific focus on supporting people at risk of homelessness within the Private Rented Sector, they provided valuable information and lessons about the support required by these people and the most appropriate delivery mechanisms. Funding from Money Advice Service enabled the Wales Co-operative Centre to continue this work until March 2018 through a new project, **Your Money, Your Home** (YMYH). The Your Money Your Home's Legacy Report can be seen [here](#).

Gingerbread – Family Finance Project

The goal of the Family Finance Project (FFP) was to develop more resilient and financially capable single parent families. The Money Advice Service delivered face-to-face and online facilitated training to 134 single parents in South Wales in order to improve their financial capability and financial decision-making. They were successful in engaging workless single parents and two-thirds of participants were unemployed. The majority of participants were in receipt of benefits, most commonly

income support and job seekers allowance. The majority of participants were female (92%), and aged between 26 and 35 years old (45%).

Key findings:

Significant positive changes for single parents participating in FFP were reported six weeks after completing the programme:

- Participants felt more confident about managing their financial situation.
- There was a significant increase in participants reporting using more ways to keeping track of their spending – 73% of participants reported more ways of keeping track of spending six weeks after completing the training.
- There was a significant increase in participants reporting they were able to keep to a budget, with 40% reporting a higher frequency of keeping to a budget six weeks after completing the training.
- There was also a significant decrease in the frequency of missed or delayed bill payments.
- Many participants took action to improve their financial situation after completing FFP. Key changes included a significant increase in the number of ways in which participants reported putting money aside, with 36 per cent reporting using more ways of saving six weeks after training.
- There was also a significant increase in participants' reported confidence in talking to their children about money, with 38 per cent of participants reporting feeling more confident six weeks after training.
- Many participants also reported that they understand where to access further support after participating in the training.
- Six weeks after the training, single parents reported feeling significantly more confident in talking to financial advisers.

FORWARD LOOK

The Financial Inclusion Delivery Plan contains 60 identified actions to be taken forward by 2021. There are a number of areas within the plan which will be progressed over the coming twelve to eighteen months. The areas outlined below are just some of the priorities that we will be considering and taking forward during 2018/19. This is by no means a complete list, but is intended to give a flavour of some identified priorities.

Discretionary Assistance Fund (DAF) Referrals

A review of the signposting currently provided by the DAF will be undertaken over the next 18 months, once the results of the pilot 'resolution and resilience' referral project, working in Rhondda Cynon Taff and Carmarthenshire are known. The outcomes of this project and whether the client has any increased financial resilience as a result of the intervention, will help inform further signposting and referral services from the DAF.

The project went live in Rhondda Cynon Taff on 8 August 2018 with an average of 12 people per week during the first five weeks agreeing for a referral to be made by the DAF on their behalf. It went live in Carmarthenshire on 29 August 2018. There is so far, as anticipated, a high drop off rate between people at the point of contact with the DAF willing to engage to those actually following this commitment through and receiving ongoing assistance. The numbers actively engaging with advice providers will be closely monitored, with the different methods used by advice providers to positively engage with clients reviewed to determine which approach may be more suitable to DAF clients.

Credit Unions

Throughout 2018/19 and 2019/20, Welsh Government will continue its support to credit unions, providing revenue funding for a variety of projects with the aims of attracting new members, increasing sustainability and taking forward financial inclusion work. Support for the sector will also be continued through the use of Financial Transactions Capital funding, which will allow credit unions to take forward more financially sustainable growth plans. This will go some way to help credit unions meet the challenge of capital reserve levels.

Promotion of School Savers Clubs

Welsh Government is funding a number of School Saver development schemes until 2020. As the number of schools increases, a mapping exercise will be undertaken, identifying the number of primary and secondary school schemes across Wales.

Financial Scams

The Financial Inclusion Strategy acknowledges that increased financial capability may help people avoid becoming the victim of financial crimes, abuse and scams, which could impact on a person's ability to sustain employment, lead or contribute to debt, housing and welfare issues, all of which have established links to mental ill-health.

Welsh Government is committed to supporting partnership working amongst organisations to safeguard people and address the devastating impact of scams and fraud on victims and their families. In September 2018, the Welsh Government funded a national event, led by the Wales Against Scams Partnership (WASP), which brought together key stakeholders to discuss how to combat scams in Wales.

WASP is a partnership of organisations that is committed to fight against scams and fraud. It was founded jointly by Age Cymru and the Older People's Commissioner for Wales with the aim of making Wales more hostile to those who would scam older and vulnerable people. Its members include Trading Standards, Scambusters, Get Safe Online, Welsh Police Forces, Welsh Local Government Association, the Information Commissioner's Office, Barclays Bank, Lloyds Bank, Halifax and British Gas. Welsh Government will continue to work in partnership with the WASP to make Wales a safer place for vulnerable people by working to influence change in areas where scammers operate.

The Impact of other Policies and Practices on Financial Inclusion

Welsh Government will explore, with partners, a second tier specialist support service for IAQF accredited providers to include, if appropriate:

- Continuing Professional Development (CPD) accredited adviser training offer;
- Telephone advice on complex cases;
- Direct representation for test cases;
- Occasional policy evidence papers.

Welsh Government and the National Advice Network (NAN) recognise the value in this proposal. An options appraisal to determine the model for the second tier service will be undertaken by NAN during 2019.

Quality Assured Information and Advice Provision

The Welsh Government remains committed to supporting information and advice providers so we can feel confident some of the most vulnerable people in our society have access to free and impartial advice on debt and money management issues and support to resolve problems linked to housing, debt or accessing welfare benefits. Positive progress is being made with the Information and Advice Action Plan regarding the plans for the future funding of information and advice services.

Integrated Advice Services Fund

The Welsh Government will continue working with the advice sector and other key stakeholders, including local authorities on how social welfare information and advice provision can be better strategically planned at national and regional levels, with providers encouraged to design and deliver services collaboratively. Through this work, the Welsh Government, together with its partners, will develop a sustainable and cost effective model of delivering information and advice services that reach the households across Wales who are in most need of help, ensuring people will be seamlessly assisted by integrated and person-centred services.

To enable information and advice service provision to be better co-ordinated, strategically planned and more sustainable, the Welsh Government has agreed its current three advice funding streams will be merged into a single funding stream in 2019. An Advice Services Commissioning Working Group has been established to provide the Welsh Government with expert advice, guidance and support as it develops a strategic and integrated commissioning plan for preventative to specialist social welfare advice and information services based on need.

Welsh Government are currently working with the grant recipients, other advice providers and key stakeholders, including Local Authorities and funders, to develop

the framework through which we aim to ensure there is joined-up and sustainable approach to the future funding and delivery of advice services.

Debt Advice / Money Guidance Alignment

The requirement in the Financial Guidance and Claims Act 2018 for a share of the financial levy in respect of funding for debt advice services to be devolved to the Welsh Government, will enable a more integrated approach to the commissioning of debt advice services in Wales to be developed, with debt advice services being delivered alongside other areas of social welfare advice funded by the Welsh Government, such as, housing, welfare benefits, and employment advice.

The Welsh Government has an aspirational aim for the advice services it funds; where the advice required to resolve problems is seamlessly delivered alongside the activities that people need to build their resilience and, as far as practical, prevent similar issues developing in the future.

The provision of financial guidance / capability services are key resilience building activities. Whilst the responsibility for such services will lie with the Single Financial Guidance Body (SFGB), the legal requirement for the SFGB to work with the Welsh Government will provide the means to ensure the SFGB's approach to the provision of money guidance and financial capability services in Wales, reflects and complement the Welsh Government's vision for advice services within Wales.

Breathing Space and its Links with SFGB

The Financial Guidance and Claims Act 2018 has introduced a requirement that, within three months of the establishment of the SFGB, the Secretary of State must seek advice from the SFGB on the establishment of a debt respite scheme, comprising of a Breathing Space and Statutory Debt Repayment schemes. The Act requires the SFGB to provide its advice within 12 months of being asked and as soon as reasonably practicable after receiving advice from the SFGB the Secretary of State must consider whether to make regulations establishing a debt respite scheme. Should the Secretary of State make regulations for the scheme to apply in Wales they must be approved by the National Assembly for Wales.

Welsh Government officials will be working closely with the UK Government and the SFGB, in addition to advice providers and other stakeholders, to influence the development of any scheme, and determine whether it meets the requirements for Wales.

Following the Autumn Budget held on the 29 October 2018, the UK Government launched a public consultation on the Breathing Space and Statutory Debt Repayment Schemes to seek expert views about how best to design, implement, and administer the schemes. The consultation seeks expert views about how best to design, implement, and administer such a scheme. To read and respond to the consultation please visit <https://www.gov.uk/government/consultations/breathing-space-scheme-consultation-on-a-policy-proposal>. The consultation ends on the 29 January 2019.

Brexit Transition

The UK's exit from the EU has created an unprecedented period of uncertainty for EU citizens who have chosen to live and work in Wales. It is important that the Welsh Government devotes adequate resource and sufficient attention to the decisions of the UK Government to ensure the rights of EU citizens are not lessened as we move through the process of leaving the EU. In January 2018 the Welsh Government announced a £50 million European Transition Fund.

In ['Brexit and Fair Movement of People'](#) the Welsh Government stated its vision for Wales “as an inclusive country in which people from all backgrounds are welcomed, and where there is no room for xenophobia, racism or bigotry.” Brexit and Fair Movement of People also identified the need to support strategic litigation and fund advice and advocacy for minimum labour standards for both UK and EEA Citizens living in Wales who may be at risk of exploitation.

As part of the Welsh Government’s commitment to supporting EU Citizens at this unprecedented time of uncertainty, additional advice service provision will be commissioned later this year. Welsh Government will support advice providers to meet the anticipated increase in their engagement with EU Citizens who will be seeking advice on their rights to remain living and working in the UK. We also want to ensure EU Citizens have access to the specialist employment and discrimination advice they may need to challenge bad workplace practices and access their legal employment entitlements.

Justice Commission

A Commission on Justice in Wales, chaired by Lord Thomas of Cwmgiedd (the former Lord Chief Justice of England and Wales) was established by the Welsh Government in December 2017 to review the justice system and policing in Wales.

During the course of its work the Commission is examining numerous areas, including, ‘the importance of access to justice for all – including affordable and accessible redress, through fair access to the courts, to legal advice and other advice services’.

Linked to this area of work, Welsh Government officials and members of the National Advice Network Wales met with the Commission to discuss how to ensure the people of Wales have access to quality assured information and advice services, which can help them to make informed decisions and enforce their rights to civil justice. The Commission will publish a report of its findings and recommendations during the course of 2019 and it is anticipated that ensuring the people of Wales have the means to access civil justice will feature within the recommendations.

Speaking at the Law Society launch event for this year’s Justice Week in Wales, the Counsel General, Jeremy Miles, talked about his vision for a Welsh justice system which reflects the values and characteristics of Welsh society and is based on fairness, and social and economic justice by developing a distinct justice system for Wales. He argued that current justice arrangements are not fit for purpose and that policing and justice need to be devolved in order to deliver a fair and equitable justice system in Wales. He said:

“One of the most profound challenges to a fair and equitable justice system is the increasing pressure brought about by repeated cuts in funding. In Wales we have experienced disproportionately higher cuts to legal aid compared to those for the whole of England and Wales. Legal Aid provision is facing a fundamental crisis in the UK today and we need to take action.”

“Another major challenge facing the justice system in Wales is the integration of justice with public services. Our current system of government is complex and confusing and inconsistent with the rest of the UK and other decentralised legislatures across the world. This is largely due to the growing divergence between the laws in England and Wales and the UK Government’s wish to protect a single

legal jurisdiction. This impacts upon our ability to provide efficient and effective, joined-up public services for Wales."