

Constitutional and Legislative Affairs Committee  
National Assembly for Wales  
Cardiff Bay  
Cardiff  
CF99 1NA

Dear committee members,

### **Draft Wales Bill**

Chwarae Teg is working to build a Wales where women achieve and prosper. As well as working directly with women and employers we work to bring about cultural change to make this vision a reality. A key element of this work is to engage with the National Assembly for Wales and Welsh Government as policy and legislation is developed. The Draft Wales Bill could bring about significant change to the manner in which we do this and the ability of the Welsh Government and National Assembly to take action in this area. While we do not feel best placed to address each of the points listed in the terms of reference we wanted to share a couple of key concerns.

#### **Clarity**

As an organisation that seeks to engage with and influence policy and legislation in Wales we have concerns about the lack of clarity in the current Draft Wales Bill. The initial proposal to move towards a reserved powers model that would bring greater clarity to what the Welsh Government have competency to legislate on does not seem to have been delivered. The list of reserved powers appear much longer, with many more exceptions than the Scottish model. We fear that the result of this will be greater confusion and delays in the progress of legislation through the Assembly to Royal Assent.

A further element of confusion appears to be the proposed “necessity test”. We share concerns that if this constitutes a more powerful veto by MPs this could undermine the National Assembly as the democratically elected Welsh legislature. Suggestions that Acts passed during the current Assembly term would not have been possible under the new proposals add to these concerns and create yet more uncertainty about what will sit within the competency of future Assemblies.

#### **Timescales**

With a Bill that will deliver such substantial change to the legislative power of the Welsh Government and National Assembly it’s vital that the time is taken to ensure that it is fit for purpose and can deliver a lasting settlement. All actors need to

understand what the proposals will mean for them so that the Bill can be subject to effective and robust scrutiny. With that in mind we have serious concerns about the tight timescales that have been applied to the Draft Wales Bill. The short time afforded to the National Assembly to carry out scrutiny of the draft bill has meant that organisations like Chwarae Teg have been unable to engage with a full understanding of what the Bill might mean for our work and the ability of future Welsh Governments to deliver legislation that could support women to play a more active role in our economy.

It's also concerning that the Bill may be introduced to Parliament with little time for Welsh political parties to finalise their manifestos for the 2016 Welsh election. This could significantly impact on the democratic process of the election with neither politicians nor voters clear on what the next Assembly will be able to deliver on.

As the Bill is developed we hope these shared concerns will be considered so that an effective settlement that offers clarity and does not see any roll back in the powers of the Assembly can be delivered for Wales.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Joy Kent', with a stylized flourish at the end.

Joy Kent  
**Chief Executive**