

Strengthening Local Government: Delivering for People

Page 2: Chapter 3

Q1. 1a. What practical steps could the Welsh Government take to make current regional working easier and more effective, for example in relation to education consortia, social services and the City Regions and City and Growth Deals?

No Response

Q2. 1b. What are your views on the common elements to the process of mergers we outline in this section?

No Response

Q3. 1c. What are your views on the options for creating fewer, larger authorities which we have set out?

Agree 10 makes sense. But how many times are we going to change the boundaries? Several in my life time - each one costs money, takes time and disrupts services. Get it right this time please.

Q4. 1d. Are there other options for creating fewer, larger authorities we should consider?

No Response

Q5. 1e. Do you have evidence on costs, benefits and savings of each option which can inform decision-making? If so, please provide details.

No Response

Page 3: Chapter 4

Q6. 2a. Do you agree that providing clarity on the future footprint of local government is important?

yes

Q7. 2b. Do you agree with the factors we have identified to inform our thinking? Would you change or add any?

No Response

Q8. 2c. What are your views on the new areas suggested in this section?

10 is right

Q9. 2d. Do you have alternative suggestions and, if so, what is the evidence to support these as an alternative?

No Response

Q10. 2e. In the context of these proposals, are there other ways we should simplify and streamline joint working arrangements at regional level and among public bodies within the new authority areas? If so, what are they?

No Response

Page 4: Chapter 5

Q11. 3a. Do you agree with the proposed process of transition: namely establishing Transition Committees and ensuring elections to Shadow Authorities can be held ahead of vesting day for the new authorities?

No Response

Q12. 3b. Do you agree that, if option 1 were pursued, we should set a date by which voluntary merger proposals should come forward in each electoral cycle?

No Response

Q13. 3c. Do you have any other thoughts on the proposed process?

No Response

Q14. 4. The consultation suggests holding any local government elections in June 2021. Are there any reasons why June 2021 would not be a suitable date? If so, please suggest an alternative date with the reasons why that would be more suitable.

No Response

Q15. 5. The Welsh Government recognises that there are some plans or assessments, for example the preparation of assessments of wellbeing by Public Service Boards, which are linked to electoral cycles. We will make provision to make sure these tie into any new electoral cycles going forward. Are there any other plans or matters which might be tied into the electoral cycle which we need to consider?

No Response

Q16. 6. What are your views on the approach which should be taken to determining the parameters of electoral reviews?

No Response

Page 5: Chapter 6

Q17. 7a. How can councils make more effective use of their elected members knowledge of, and connections in, their communities?

Selection of elected members will be critical. we need a fair balance in terms of geography so no area is over represented and can skew decisions.

Q18. 7b. How could we better recognise the level of responsibility involved in being a local councillor? What changes to the remuneration and support councillors receive would enable a wider range of people to become involved in local democratic representation?

No Response

Q19. 8a. Are there other powers which local government should have? If so, what are they?

No Response

Q20. 8b. Are there other freedoms or flexibilities which local government should have? If so, what are they?

No Response

Q21. 9a. Which areas offer the greatest scope for shared transactional services?

No Response

Q22. 9b. How might such arrangements be best developed?

No Response

Q23. 10a. In ensuring we deliver a consistent approach across Wales, where consistency is important, how do you think the advice and support on each of these matters could be best provided?

No Response

Q24. 10b. Are there any other challenges or opportunities from structural change or providing additional powers and flexibilities that have not been identified above? If these areas require support, what form should this support take?

No Response

Q25. 10c. Which of the issues identified above or in your response should be prioritised for early resolution?

No Response

Q26. 11a. What effects do you think there would be?

No Response

Q27. 11b. How could positive effects be increased, or negative effects be mitigated?

No Response

Q28. 12. Please also explain how you believe the proposed policy within this consultation could be formulated or changed (if required) so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No Response

Q29. 13a. Are there any positive or adverse effects not identified in the assessment?

No Response

Q30. 13b. Could the proposals be reformulated so as to increase the positive effects or reduce any possible adverse effects?

No Response

Q31. 14a. Are there any other positive or adverse effects not identified in the assessment?

No Response

Q32. 14b. Could the proposals be reformulated so as to increase the positive or reduce any possible adverse effects?

No Response

Q33. 15. Please provide any other comments you wish to make on the content of this consultation.

No Response

Page 7: Submit your response

Q34. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name B Griffiths

Organisation (if applicable) -

Q35. If you want to receive a receipt of your response, please provide an email address.
Email address

[REDACTED]

Q36. Telephone

No Response

Q37. Address

Llangefni
Anglesey

Q38. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response

Dear Sir/madam,

I have been requested to write to you, on behalf of the Bay of Colwyn Town Council, in response to your recent Green paper entitled 'Strengthening Local Government: Delivering for People.'

The consultation document has been considered by the Town Council at several recent meetings and it has a number of concerns about the proposals therein, as summarised below:

1. The Town Council objects to the principal of forced mergers to create fewer, larger authorities and does not feel that the Welsh Government has set out a strong enough argument in favour of this. It does not feel that larger authorities will strengthen local government at all, but take it further away from the citizens in our communities and move towards greater centralisation of power.
2. We are not convinced by the costs, benefits and savings of the proposed mergers and understand that these have also been questioned not only by the existing local authorities but by several major accountancy bodies. There is concern that the proposed savings will simply be swallowed up by an expansion in the number and remit of Assembly Members, taking power away from our local communities.
3. The Town Council was happier with the proposals put forward in the previous white paper, Resilient and Renewed, whereby each local authority front door would be retained, with some services being delivered on a regional basis, where this was proven to be the best model of delivery, both in terms of cost and in quality and consistency of service.
4. Bigger is definitely not always better.
5. The Town Council does not have sufficient knowledge or experience to comment on the remaining consultation questions, but in summary it supports the views of Conwy County Borough Council in objecting strongly to the proposals contained in the green paper.

I would be grateful if you would acknowledge receipt of this response.

Kind regards,

[REDACTED]
[REDACTED]

Strengthening Local Government: Delivering for People

Page 2: Chapter 3

Q1. 1a. What practical steps could the Welsh Government take to make current regional working easier and more effective, for example in relation to education consortia, social services and the City Regions and City and Growth Deals?

Would a larger Local Authority be more difficult to engage with for smaller Community & Town Councils

Q2. 1b. What are your views on the common elements to the process of mergers we outline in this section?

No Response

Q3. 1c. What are your views on the options for creating fewer, larger authorities which we have set out?

This Council believe there should be an option for status quo with promotion of improved partnership working between local authorities.

Q4. 1d. Are there other options for creating fewer, larger authorities we should consider?

Voluntary partnerships/mergers with better options should be available.

Q5. 1e. Do you have evidence on costs, benefits and savings of each option which can inform decision-making? If so, please provide details.

Barry Town Council have no evidence of costs, benefits and savings of each option. We believe that a cost analysis was carried out in 1995 but are unaware of anything similar having been carried out since then. We would be concerned that during the transfer periods and the time leading up to this local authorities would be reluctant to start up any new initiatives and that there would be an inertia to services. Also the cost in stress caused to staff waiting to see what the outcomes would be are worrying.

Page 3: Chapter 4

Q6. 2a. Do you agree that providing clarity on the future footprint of local government is important?

Yes

Q7. 2b. Do you agree with the factors we have identified to inform our thinking? Would you change or add any?

Barry Town Council have issues with aligning mergers with the health board boundaries

Q8. 2c. What are your views on the new areas suggested in this section?

It is already difficult for CC's and TC's to engage meaningfully with the Vale PSB as a non-statutory invitee - this is likely to put more barriers in the way.

Q9. 2d. Do you have alternative suggestions and, if so, what is the evidence to support these as an alternative?

Allow local authorities to make mergers across Health Board boundaries and help to make cost savings

Q10. 2e. In the context of these proposals, are there other ways we should simplify and streamline joint working arrangements at regional level and among public bodies within the new authority areas? If so, what are they?

Produce evidence of current working relationships.

Welsh Government shouldn't rely on the sector representatives alone to inform them of these relationships, they should consider contact authorities directly.

Page 4: Chapter 5

Q11. 3a. Do you agree with the proposed process of transition: namely establishing Transition Committees and ensuring elections to Shadow Authorities can be held ahead of vesting day for the new authorities?

Transition issues from 1995/96 prove that problems will occur with shadow authorities

Q12. 3b. Do you agree that, if option 1 were pursued, we should set a date by which voluntary merger proposals should come forward in each electoral cycle?

yes

Q13. 3c. Do you have any other thoughts on the proposed process?

We believe that this process is unlikely to succeed

Q14. 4. The consultation suggests holding any local government elections in June 2021. Are there any reasons why June 2021 would not be a suitable date? If so, please suggest an alternative date with the reasons why that would be more suitable.

The idea of 2022 was so that Assembly/Unitary and Community & Town Council's would be aligned. Would this change also apply to TC's.

Q15. 5. The Welsh Government recognises that there are some plans or assessments, for example the preparation of assessments of wellbeing by Public Service Boards, which are linked to electoral cycles. We will make provision to make sure these tie into any new electoral cycles going forward. Are there any other plans or matters which might be tied into the electoral cycle which we need to consider?

Town Council elections

Q16. 6. What are your views on the approach which should be taken to determining the parameters of electoral reviews?

One size doesn't fit all, and when comparing areas it should be compared on a like for like basis

Page 5: Chapter 6

Q17. 7a. How can councils make more effective use of their elected members knowledge of, and connections in, their communities?

Leave the Vale of Glamorgan as is

Q18. 7b. How could we better recognise the level of responsibility involved in being a local councillor? What changes to the remuneration and support councillors receive would enable a wider range of people to become involved in local democratic representation?

Expenses will increase as there will be bigger distances to travel for meetings etc. and larger constituencies to govern. This in turn may deter members from re-standing for election. There is no security in being elected more than once and therefore it would not be an option for relinquishing secure jobs to attend meetings and carry out council work.

Q19. 8a. Are there other powers which local government should have? If so, what are they?

Town Council's in respect of planning laws. More planning decisions should be delegated to Town Councils.

Q20. 8b. Are there other freedoms or flexibilities which local government should have? If so, what are they?

Delegate more responsibilities to Community & Town Councils

Q21. 9a. Which areas offer the greatest scope for shared transactional services?

Social services, grounds maintenance (if similar authorities merge)

There should be more joint working between BTC and VOG Councils

Q22. 9b. How might such arrangements be best developed?

A sliding financial support could be put in place.

Q23. 10a. In ensuring we deliver a consistent approach across Wales, where consistency is important, how do you think the advice and support on each of these matters could be best provided?

No consistent approach being offered throughout this paper and therefore would consider it would be difficult to have consistency in implementing it.

Q24. 10b. Are there any other challenges or opportunities from structural change or providing additional powers and flexibilities that have not been identified above? If these areas require support, what form should this support take?

No opportunities for VOG in this consultation

Q25. 10c. Which of the issues identified above or in your response should be prioritised for early resolution?

Leave the Vale of Glamorgan as it is.

Page 6: Impact assessments

Q26. 11a. What effects do you think there would be?

None

Q27. 11b. How could positive effects be increased, or negative effects be mitigated?

Not relevant to be Cardiff & Vale of Glamorgan

Q28. 12. Please also explain how you believe the proposed policy within this consultation could be formulated or changed (if required) so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Polices will not improve by amalgamation, it is the Welsh Language Policies that improve Welsh Language

Q29. 13a. Are there any positive or adverse effects not identified in the assessment?

There could concerns over social services standards

Q30. 13b. Could the proposals be reformulated so as to increase the positive effects or reduce any possible adverse effects?

No - cannot identify positive effects as yet.

No - cannot identify positive effects as yet.

Q31. 14a. Are there any other positive or adverse effects not identified in the assessment?

Should be consistent across Wales as defined by the Equalities Act 2010.

Q32. 14b. Could the proposals be reformulated so as to increase the positive or reduce any possible adverse effects?

No

Q33. 15. Please provide any other comments you wish to make on the content of this consultation.

Barry Town Council see no benefit in a merger between the Vale of Glamorgan and Cardiff Councils. we are concerned about the effect this merger would have on Community & Town Councils in the Vale, as Cardiff Council has limited knowledge of such authorities.

Barry Town Council would be opposed to any merger between Cardiff and the Vale of Glamorgan Councils

Page 7: Submit your response

Q34. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name

[REDACTED]

Organisation (if applicable) Barry Town Council

Q35. If you want to receive a receipt of your response, please provide an email address.
Email address

[REDACTED]

Q36. Telephone

[REDACTED]

Q37. Address

[REDACTED]

Barry

[REDACTED]

Q38. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response

Strengthening Local Government: Delivering for People

Response by the Bevan Foundation to the Welsh Government's Green Paper

1. Introduction

The Bevan Foundation is an independent, charitable think-tank that develops solutions to Wales' most challenging problems. We are grateful for the opportunity to respond to the Green Paper on Local Government Reform. This paper supplements our responses to the set questions because we consider that the set questions do not address the fundamental issues.

The views in this paper draw on our extensive work on poverty and inequality in public services, the extensive experience of local government on the board of Trustees, and a round-table discussion held on 5th June 2018 with representatives of people in communities and with various protected characteristics.

2. Crisis in Democracy

The people of Wales have demonstrated dissatisfaction with and disconnection from the established institutions of government at all levels. In Wales people are less likely to be interested in politics or claim to be knowledgeable about politics than in any other part of Britain. They are less likely to vote than elsewhere, with barely 4 out of 10 of the electorate voting in the May 2017 elections. Only 11% feel that they are locally influential, the lowest proportion in Britain, with fewer than 10% engaging with their local council e.g. via consultations. Half the electorate is dissatisfied with how their council relates to them. Local councillors do not reflect the diversity of the electorate and in the 2017 local authority elections in one in thirteen seats candidates were returned unopposed.

This comes at a time when the capacity of government institutions to maintain and improve the services they deliver is constrained by a combination of reducing real resources and increasing demand. The further cuts in prospect are likely to hit hardest those who are least well-placed to make their voices heard, for example because they are already struggling with ill-health or caring responsibilities or to get by on a low-income. The Green Paper recognises the financial pressures, but in focusing on efficiencies and structures but not on engagement, the proposals do not enable the people who will be most affected by cuts to be listened to. Not only is there no guarantee that services will improve as a result of the changes, but there is every likelihood that the disconnect between institutions and the public will get worse.

Instead, we believe that the Welsh Government should aim to strengthen local democracy and through a robust and vibrant system of local authorities it will deliver good government.

2.1. *Transparency of decision-making*

At our round-table discussion, there was universal agreement that people feel disconnected and disengaged from democratic structures, including local authorities, confirming the statistics.

One of the big issues is ... how disengaged people actually are about public services and local government. Engagement and different ways of working should be .. the foundation of how government works but at the moment local democracy feels a little bit 'over there' for a lot of people. ... It's not clear to them who makes what decision and how they can influence those decisions.

Participants told us that people they worked with did not understand that decisions that affected their everyday lives were being taken by others, let alone that they stood any chance of influencing those decisions.

It's not just that people are not sure how to influence decisions, they're not even aware that decisions are influencing their lives. ... They're disconnected from the fact that somebody somewhere made a decision. ... Their perception is that the decision just happened ... [the changes] just erupted like a mystical plant.

The lack of awareness and lack of power they experienced was compounded by the number of different organisations that took decisions about their lives, from the Department for Work and Pensions to the local authority to the Welsh Government, local further education college and local health board.

We've put on numerous accredited development programmes for our members like 'who's your representative' and most people have about seven! With seven representatives how do you affect change, how do you get your voice heard and how do you make a difference?

You've got community councillors, possibly more than one councillor, two types of Assembly member, an MP, an MEP for now, several Commissioners – where do you go? People ring us with issues and, you know, it's where do they go?

Further complexity was added by joint working, with City Deals in particular being cited as having opaque powers and decision-making structures.

The people in the communities I work with ... haven't got a clue what City Deal means. We're going to have people sitting on the top of [community] looking down at this lovely new City Deal ... wondering how it benefits them?

Even for people who know how to navigate the system, identifying decision-makers in the plethora of public appointments and securing responses from them could be difficult. The suggestion was made that the Welsh Government should establish a publicly-accessible register of all public appointments to increase transparency, but the fundamental issue of a large number of people taking decisions about people's lives remains.

Some members of the discussion groups suggested that the sense of disconnection and powerlessness affected people's mental health, particularly if they saw some groups in society benefiting from changes when they did not.

2.2. Engagement

We acknowledge that some local authorities have made efforts to engage with citizens in their area, but their incidence is patchy and the impact is mixed. Similarly, we acknowledge the potential of a previous proposal to require local authorities to draw up public participation strategies. However, we do not consider that these initiatives address the question of the number of different bodies taking decisions about people's lives. Nor are we persuaded that duties to prepare strategies or to engage would be effective: some organisations feel compliance with the existing Public Sector Equality Duties has been partial and has not addressed the fundamental disconnection that people experience. Other engagement structures such as older people's forums are perceived to be often tokenistic, bureaucratic and ineffective.

We get frustrated because there's a lot of legislation ... strategies and frameworks but these don't seem to get translated into changes in the ground that affects people's lives ... We just never seem to be able to make any progress.

They've got a series of older people's forums but they put no effort into making them work. You see an older people's forum for the whole of west [city] and there's only four people there! They do absolutely nothing to encourage more people to come ... but they can tick the box on equalities

And even when people did participate in consultation exercises or similar, they often received little if any feedback on the decision itself, which could be buried in pages of committee reports or minutes.

The disconnect between we said this, what happened with our views to make the decision,... the decision still feels like it's made, not behind closed doors, but doors that you have to know where knock to get in

Some participants suggested that consultation often felt tokenistic, and that because consultees were not aware of the whole decision-making process they could feel ignored or rejected if no change resulted.

People have to be clear where the line is and how much power and control they have and what will happen then. If they don't know where that line is, they'll feel 'well, I asked for a new school but it didn't happen so they didn't hear me'.

2.3. Voting

On voting, participants welcomed the extension of votes to 16-year-olds but were not convinced that it was sufficient to increase participation of young people nor did address the lack of participation of other groups of people. For example, there are still significant barriers for disabled people accessing polling stations and most party manifestos are not available in formats other than standard English or Welsh.

To sum up, we are concerned that the proposals in the Green Paper do not address the fundamental challenges of democratic engagement outlined above. Reducing the number of local authorities across Wales does not reduce the plethora of organisations that an individual citizen has to engage with, ensure that local authorities' engagement is effective nor encourage people to vote. We are also concerned that an increase in joint working, whether voluntary or mandatory, could add to the confusion about 'who does what' for citizens and make influencing and tracking decisions even harder.

3. Closeness to the community

Increasing the size of local authorities means that they are inevitably more geographically remote from the communities they are supposed to serve. Local authorities have a role far beyond the simple delivery of services, which is to articulate, represent and speak-up for people in their area. They can generate civic pride, drive local regeneration and co-ordinate and ensure coherence between other public services being delivered in the area. To do this well, they need to have a geographical footprint that reflects how people live and work, as well as their sense of identity.

3.1. Local authorities as place-makers

This vision of local government as an active sphere of government, rather than service-delivery agents, is conspicuous by its absence in the Green Paper and, to a lesser extent, in how local government has operated in Wales to date. By proposing larger, more geographically remote councils the Green Paper's proposals would reduce further the role of local authorities to govern, develop and represent their areas. This affects their basic role.

Citizens are much more likely to give up their time and energy to engage with a body that is relevant to their everyday lives than one which is a remote delivery agent. The proposal to re-invent the old Mid Glamorgan (minus Rhymney Valley) footprint is particularly problematic: it is hard to imagine people in Dowlais having much affinity with an authority that also covers Porthcawl and Llantrisant.

If elected members of larger local authorities are to give adequate time to the oversight of strategic services, then a mechanism needs to be in place to maintain a relationship with locality. The Green Paper envisages a role for Community Councils with more detail in the autumn, but without knowing what the Cabinet Secretary has in mind it is difficult to see how representation will be improved by increasing the size of principal authorities. The introduction of yet another government structure risks increasing confusion and lack of accountability rather than strengthening it.

3.2. *Boundaries*

We accept that the current local authorities in many places do not reflect local identities or travel-to-work patterns. However, some of the Green Paper's proposals are a top-down convenience that are even more disconnected from how people live and work than the current map, and will only make matters worse.

The very significant upheaval and costs involved in local government reorganisation should only be undertaken if the changes will result in a much better alignment between authorities and communities. This might mean adjustments at the margins (for example to reflect Cardiff's much larger travel-to-work area) or a more radical change (for example to reflect the increase in commuting and travel for leisure and essential services across the Heads of the Valleys). But *any* changes should be to improve the alignment between council and community.

We are also disappointed that the Green Paper adopts a one-size-fits-all approach. Wales is a diverse country with a complex geography. Metrics such as an 'ideal' population size or 'benchmark' electorate per councillor might work in larger towns and cities but simply fail in rural areas and the South Wales valleys. Powys is recognised as a 'special case' but so too should rural areas in West Wales and the communities of the south Wales valleys. If the result is councils of varying sizes, some of which might need different arrangements for some services, so be it.

To sum up, we do not agree that creating larger local authorities will strengthen local *government*, either as bodies that represent and speak-up for their communities or as bodies that understand and are accountable to local people. Further, by continuing to focus on geography the fundamental challenges of local democracy are not being addressed.

4. Role of local politicians

The Green Paper aims to increase interest in becoming a councillor and to increase the diversity of local representatives. It proposes reviewing the number of councillors, valuing their contribution through changing their remuneration, and encouraging authorities to offer more support to councillors. We do not consider that these proposals are sufficient to address the problems of lack of interest and lack of diversity.

In our view, the lack of interest and diversity stem from deeper issues than remuneration and support.

4.1. Political discourse and practice

There is a weak local political discourse and lack of variation in how politicians 'do' politics. As one participant said:

There's no every day political discourse ... about anything! It should be the first duty of all politicians to provide the opportunity for that discourse, and therefore for civil society to engage with it. We should be challenging politicians ... to reinvent and rediscover that skill and that ability to engage with people. ... It should be a common requirement.

A number of participants said there needed to be much more debate and discussion at community level and that public investment in participation had been too focused on national rather than local-level activity.

What Wales isn't doing is investing at the bottom level ... The way to deal with disengagement is better public discourse at the localist level – so people understand it is their society, their country

Fostering local energy and engagement will be all the more difficult with ever-larger constituencies because the burden of case-work could well swamp other activities. As pressure on public spending increases, more time will be spent justifying difficult decisions over who gets what and who receives nothing.

Participants mentioned that some local politicians are developing new ways of working with their constituents, for example using social media or employing community workers, sometimes to the considerable irritation of those politicians who stick to conventional methods. Other methods such as participatory budgeting or citizens' assemblies could also be effective.

There are no proposals in the Green Paper to support new ways of working or greater, local political debate. Indeed, the emphasis on larger bodies and on service delivery risks stifling the little local political discourse that exists.

4.2. Role of Civil Society

Civil society has a major contribution to make to fostering local capacity, engagement and debate and in particular can reach some sections of society more effectively than local authorities (and other public bodies). Most local authorities and other public services already rely on the voluntary sector to support the delivery of services. As austerity continues to constrain the public purse, ever more reliance will be placed on individuals and communities to do things for themselves. This requires both culture change and enabling tools: for example Monmouthshire County Council employs a Volunteer Adviser who provides training and guidance to the third sector on the development and implementation of policy/practice to ensure volunteers meet the essential standards for delivery in their sphere. The role of civil society is also recognised in many public and third sector interventions, from the now-ended Communities First to the Big Lottery Fund's Community Voice programme.

However the underlying tensions between two different forms of democracy have not been addressed, with the result that much time and energy is wasted in disagreements between proponents and many opportunities for co-operation and learning are lost.

Recognising and supporting local authorities' role not just as a deliverer of services but as the representative and spokesperson of a place, along with effective structures and dialogue would be a start. Neither is addressed in the Green Paper.

4.3. Councillor responsibilities

There were suggestions that the role of councillors could be enhanced beyond being a case-worker, for example by councillors contributing to the decisions of other public bodies that affect his or her patch or co-ordinating constituents' contact with other public bodies.

One participant commented that local councillors have very little power and the role can be 'boring', making it a not very attractive proposition. Another suggested that new or changed government functions should not automatically be located in arms-length government bodies or quangos, but that there should be a presumption in favour of situating them in local authorities.

If local authorities have more responsibilities then they could attract a wider range of councillors. There has been no public debate about which tier of government should deliver what services, but the current division is not necessarily the right one. Consideration should be given to increasing local authorities' role in health, further education and environmental services to name but three, all major local services none of which have democratic representation.

This in turn raises questions about the role of Welsh Government, which should arguably focus on setting standards and monitoring outcomes, rather than delivering services through a growing number of quangos and agencies.

4.4. Diversity

In our discussions, diversity was seen to underlie a lack of interest in politics, and increasing diversity to be key to strengthening local democracy. It was felt that past attempts to improve diversity had not achieved lasting change. The diversity sought needed to encompass socio-economic background as well as characteristics protected by the Equality Act 2010 such as age, ethnicity and disability.

Participants recognised that good councillors invested a very significant amount of personal time and effort and often paid a high price in terms of loss of privacy and being a target of abuse, for modest reward.

From the outside [politics] can seem quite nasty, very tribalistic, very personal – who would want to be involved with that? ... It's not how you would behave in a workplace.

It's often petty, it's often divisive ... it's not good for people on the ground

The question of remuneration was more controversial. One participant commented that the remuneration of other representative roles – such as members of health boards – was not only very much better but also had far better support (e.g. Community Health Councils to deal with complaints) than Leaders of local authorities. Another said that increasing remuneration risked attracting people to stand to improve their careers rather than represent their communities.

Some participants suggested that the solution ultimately rested with political parties who nurtured and selected the majority of prospective candidates. Difficult questions about quotas, attendance requirements and councillor education need to be addressed too.

5. Conclusion



The Green Paper and the consultation questions focus almost exclusively on service efficiencies and boundaries. We understand the acute pressures on local government services and the need to ensure that they are sustainable. However, in our view the underlying challenge is the low level of democratic participation, which contributes to weak governance and which in turn affects performance.

Rather than trying to strengthen local government by making organisations more remote from the communities they serve, local government should be strengthened by creating vibrant local democracies in which authorities are genuinely representative of their diverse people and communities, have a deep understanding of their needs and aspirations, and are held to account for delivery.

Achieving this means developing a shared vision about the role of public services across the board in supporting and serving local communities. There should be a debate about the role of local government in this mix, including what powers local authorities should have, what electoral arrangements are required to ensure they represent the electorate how scrutiny by and accountability to the electorate can be increased, and how to get the right balance between local choices and national standards.

This is a profoundly different approach to that in the Green Paper, and will require a deep and ongoing dialogue with local people, and their elected and civil society representatives. But it is a conversation that must take place if Wales is to have the government – at all levels and for all people – that it needs.

Bevan Foundation


<https://www.bevanfoundation.org/> info@bevanfoundation.org 
Registered charity no. 1104191

Annex C: Consultation Questions

Your Name	
Organisation (if applicable)	Bevan Foundation
E-mail / Telephone	
Your Address	1 Merthyr Tydfil

You can find out how we will use the information you provide by reading the privacy notice in the [consultation document](#).

Chapter 3
Consultation Question 1
In Chapter 2, we restated our commitment to regional working in key areas but recognised the need for this to be supported by further change. In chapter 3, we set out the broad options for moving toward fewer, larger local authorities and summarise features of the process which would be common to each option.
a) What practical steps could the Welsh Government take to make current regional working easier and more effective, for example in relation to education consortia, social services and the City Regions and City and Growth Deals?
We do not accept that 'regional working' is the best way forward because of the significant democratic deficit that it creates in terms of transparency, accountability and accessibility of their representatives to ordinary people. The democratic deficit is especially acute for the people who are most reliant on public services but are least able to navigate complex consortia arrangements. We therefore do not support 'practical steps' to increase 'regional working'. Our paper attached provides more detail.
b) What are your views on the common elements to the process of mergers we outline in this section?
We do not agree that there has been a sufficient case in respect of strengthening local democracy to warrant a process of mergers. Our paper attached provides more detail.
c) What are your views on the options for creating fewer, larger authorities which we have set out?
We do not support the any of the options for creating fewer, larger authorities. We do not accept that the main driver of change should be service efficiency, not least because there is no evidence that larger authorities are better providers of services than smaller ones.
Instead, the driver of reform should be strengthening democratic engagement and participation in local government. If the boundaries of local authorities are to be redrawn, they should reflect the everyday lives of the citizens they are supposed to serve. This means boundaries that correspond with travel-to-work patterns and people's sense of identity, even if that means radical changes in the footprint of local authorities.

Our paper attached provides more detail.
d) Are there other options for creating fewer, larger authorities we should consider?
No, see above.
e) Do you have evidence on costs, benefits and savings of each option which can inform decision-making? If so, please provide details.
The costs will be a loss of democratic accountability – something which cannot be put into a balance sheet in the short term but in the long-term will be far more damaging to Wales' economy, society, culture and governance than any cash savings.

Chapter 4
<u>Consultation Question 2</u> Chapter 4 has explained the need for clarity on the future footprint for local government and the range of factors which should be taken into account to determine a new configuration. It sets out a suggested future footprint for local government, which could be reached via each of the options set out in the previous chapter.
a) Do you agree that providing clarity on the future footprint of local government is important?
This is a leading question. In our view the basic question of strengthening democratic participation and representation should be addressed before considering 'footprints'.
b) Do you agree with the factors we have identified to inform our thinking? Would you change or add any?
No, because these are about supposed service efficiencies and boundaries. We would add as the primary factors questions of: <ul style="list-style-type: none"> • Will people understand who takes decisions that affect them? • Does the geographical footprint of local authorities reflect how people live and work, and their sense of identity? • Do the proposed arrangements encourage people from all backgrounds, including people on low incomes and with characteristics protected by the Equality Act 2010, to participate in local government as voters and by other mechanisms? • Are the proposed arrangements likely to attract a diverse mix of prospective councillors? • Will the proposed arrangements increase transparency in decision-making and enable electors, including people on low incomes and with protected characteristics, to hold authorities to account? Our paper attached provides more detail.

What are your views on the new areas suggested in this section?
<p>In our view the new areas suggested in this section do not meet the additional criteria we have outlined above. We are concerned that in proposing some areas that bear little relationship to people's everyday lives and that cover large areas with poor geographical access across them, people will be further confused and disengaged from decision-making.</p> <p>Our paper attached provides more detail.</p>
c) Do you have alternative suggestions and, if so, what is the evidence to support these as an alternative?
<p>There needs to be a fresh, wide and public debate about reinvigorating local democracy rather than efficiencies and boundaries.</p> <p>Our paper attached provides more detail.</p>
d) In the context of these proposals, are there other ways we should simplify and streamline joint working arrangements at regional level and among public bodies within the new authority areas? If so, what are they?
<p>Joint arrangements should be the exception rather than the norm. They should be adopted only in the case of specialist services or those which require a wider strategic overview. There is a strong case, for example, for joint arrangements in respect of regional transport, land-use planning and economic development provided that decision-making is transparent and accountable.</p> <p>Any arrangements to 'streamline' joint working must not be at the expense of the fundamental principles of transparency and accountability.</p>

Chapter 5
<p><u>Consultation Question 3</u></p> <p>Chapter 5 sets out the proposed approach to transition and implications for establishing Transition Committees and elections to Shadow Authorities under each option.</p>
a) Do you agree with the proposed process of transition: namely establishing Transition Committees and ensuring elections to Shadow Authorities can be held ahead of vesting day for the new authorities?
<p>Lessons need to be learned from the processes adopted in 1996, for which there is as yet no firm evidence.</p>
b) Do you agree that, if option 1 were pursued, we should set a date by which voluntary merger proposals should come forward in each electoral cycle?
No comment.

c) Do you have any other thoughts on the proposed process?
No comment.
<p><u>Consultation Question 4</u></p> <p>The consultation suggests holding any local government elections in June 2021.</p> <p>Are there any reasons why June 2021 would not be a suitable date? If so, please suggest an alternative date with the reasons why that would be more suitable.</p>
No comment
<p><u>Consultation Question 5</u></p> <p>The Welsh Government recognises that there are some plans or assessments, for example the preparation of assessments of wellbeing by Public Service Boards, which are linked to electoral cycles. We will make provision to make sure these tie into any new electoral cycles going forward. Are there any other plans or matters which might be tied into the electoral cycle which we need to consider?</p>
No comment.
<p><u>Consultation Question 6</u></p> <p>What are your views on the approach which should be taken to determining the parameters of electoral reviews?</p>
No comment

Chapter 6
<u>Consultation Question 7</u>
a) How can councils make more effective use of their elected members knowledge of, and connections in, their communities?
Our paper attached provides more detail.
b) How could we better recognise the level of responsibility involved in being a local councillor? What changes to the remuneration and support councillors receive would enable a wider range of people to become involved in local democratic representation?
Our paper attached provides more detail.
<u>Consultation Question 8</u>
a) Are there other powers which local government should have? If so, what are they?
There is considerable scope to enhance the powers of local government. The Welsh Government has established numerous quangos or similar bodies that it funds and

directs, despite the supposed ‘bonfire’ ten years ago. Examples include Transport for Wales, Natural Resources Wales, Qualifications Wales, Health Education and Improvement Wales to name but a few, as well as numerous charities.

There has been no wide public debate about whether the creation of arms-length bodies accountable to Welsh Ministers is better than vesting some powers in local government or indeed retaining them within Welsh Government itself.

Our paper attached provides more detail.

b) Are there other freedoms or flexibilities which local government should have? If so, what are they?

Our paper attached provides more detail.

Consultation Question 9

a) Which areas offer the greatest scope for shared transactional services?

No comment

b) How might such arrangements be best developed?

No comment

Consultation Question 10

a) In ensuring we deliver a consistent approach across Wales, where consistency is important, how do you think the advice and support on each of these matters could be best provided?

No comment

c) Are there any other challenges or opportunities from structural change or providing additional powers and flexibilities that have not been identified above? If these areas require support, what form should this support take?

Our paper attached provides more detail.

d) Which of the issues identified above or in your response should be prioritised for early resolution?

Our paper attached provides more detail.

<p><u>Consultation Question 11.</u></p> <p>We would like to know your views on the effects that the proposals within this consultation would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.</p>
<p>a) What effects do you think there would be?</p>
<p>No comment</p>
<p>b) How could positive effects be increased, or negative effects be mitigated?</p>
<p>No comment</p>
<p><u>Consultation Question 12</u></p> <p>Please also explain how you believe the proposed policy within this consultation could be formulated or changed (if required) so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.</p>
<p>No comment</p>
<p><u>Consultation Question 13</u></p> <p>The Children's Rights Impact Assessment published alongside the consultation outlines the Welsh Government's view of the effect of the proposals contained in the consultation on children and young people. The Welsh Government seeks views on that assessment.</p>
<p>a) Are there any positive or adverse effects not identified in the assessment?</p>
<p>No comment</p>
<p>b) Could the proposals be reformulated so as to increase the positive effects or reduce any possible adverse effects?</p>
<p>No comment</p>
<p><u>Consultation Question 14</u></p> <p>The Equalities Impact Assessment published alongside the consultation outlines the Welsh Government's view of the effect of the proposals contained in the consultation on protected groups under the Equality Act 2010. The Welsh Government seeks views on that assessment.</p>
<p>a) Are there any other positive or adverse effects not identified in the assessment?</p>
<p>We do not regard the assessment as an adequate appraisal of the impact of the proposals on people with protected characteristics.</p>

b) Could the proposals be reformulated so as to increase the positive or reduce any possible adverse effects?
There needs to be a radical rethink based on the principles of strengthening local democracy including increasing the representation of and participation by people with protected characteristics.
<u>Consultation Question 15</u> Please provide any other comments you wish to make on the content of this consultation.
Our paper attached provides more detail.

Strengthening Local Government: Delivering for People

Page 2: Chapter 3

Q1. 1a. What practical steps could the Welsh Government take to make current regional working easier and more effective, for example in relation to education consortia, social services and the City Regions and City and Growth Deals?

Once the new boundaries have been agreed, to harmonise these other areas of regional working as far as possible. Although there will be some disruption it will make working together so much easier in the long run.

Q2. 1b. What are your views on the common elements to the process of mergers we outline in this section?

n/a

Q3. 1c. What are your views on the options for creating fewer, larger authorities which we have set out?

Sooner the better - fewer the better. Option 3.

Q4. 1d. Are there other options for creating fewer, larger authorities we should consider?

Six or seven authorities based on health board boundaries (with Powys possibly joining Ceredigion, Carmarthenshire and Pembrokeshire).

Q5. 1e. Do you have evidence on costs, benefits and savings of each option which can inform decision-making? If so, please provide details.

n/a

Page 3: Chapter 4

Q6. 2a. Do you agree that providing clarity on the future footprint of local government is important?

Yes.

Q7. 2b. Do you agree with the factors we have identified to inform our thinking? Would you change or add any?

Yes.
No.

Q8. 2c. What are your views on the new areas suggested in this section?

10 is better than 22, but 6 (or 7) would be even better. Wales is a very small place. Birmingham (3 million people) doesn't need 22 or even 10 local authorities! The Bridgend anomaly needs to be sorted quickly by changing its health board boundaries.

Q9. 2d. Do you have alternative suggestions and, if so, what is the evidence to support these as an alternative?

n/a

Q10. 2e. In the context of these proposals, are there other ways we should simplify and streamline joint working arrangements at regional level and among public bodies within the new authority areas? If so, what are they?

Encourage the Public Service Boards to work across the 10 new areas as soon as possible.

Page 4: Chapter 5

Q11. 3a. Do you agree with the proposed process of transition: namely establishing Transition Committees and ensuring elections to Shadow Authorities can be held ahead of vesting day for the new authorities?

Yes - but need to learn from the local government reorganisations of 1974 and 1996 when too many people took their eye off the ball of providing public services to concentrate on securing their own position in the new authorities.

Q12. 3b. Do you agree that, if option 1 were pursued, we should set a date by which voluntary merger proposals should come forward in each electoral cycle?

Yes.

Q13. 3c. Do you have any other thoughts on the proposed process?

n/a

Q14. 4. The consultation suggests holding any local government elections in June 2021. Are there any reasons why June 2021 would not be a suitable date? If so, please suggest an alternative date with the reasons why that would be more suitable.

No.

Q15. 5. The Welsh Government recognises that there are some plans or assessments, for example the preparation of assessments of wellbeing by Public Service Boards, which are linked to electoral cycles. We will make provision to make sure these tie into any new electoral cycles going forward. Are there any other plans or matters which might be tied into the electoral cycle which we need to consider?

n/a

Q16. 6. What are your views on the approach which should be taken to determining the parameters of electoral reviews?

n/a

Page 5: Chapter 6

Q17. 7a. How can councils make more effective use of their elected members knowledge of, and connections in, their communities?

n/a

Q18. 7b. How could we better recognise the level of responsibility involved in being a local councillor? What changes to the remuneration and support councillors receive would enable a wider range of people to become involved in local democratic representation?

It's a serious job - and needs proper pay if we're to get councillors who are up to the job. Representing local communities is only one part of the job.

Q19. 8a. Are there other powers which local government should have? If so, what are they?

The new authorities should be required to co-produce social welfare law Advice Plans for their area with advice providers, funders and other interested parties, to inform commissioning and grant decisions by local authorities, Welsh Government and other bodies such as the Big Lottery.

Q20. 8b. Are there other freedoms or flexibilities which local government should have? If so, what are they?

n/a

Q21. 9a. Which areas offer the greatest scope for shared transactional services?

Planning and funding of social welfare law advice services as part of the Welsh Government's 19 point Information and Advice Action Plan, published in December 2016.

Q22. 9b. How might such arrangements be best developed?

There needs to be proper integration with the work of the Public Service Boards to avoid duplication of effort. The PSB's can drive the sharing of services, particularly if they come together to work across the new areas before the new authorities are created.

Q23. 10a. In ensuring we deliver a consistent approach across Wales, where consistency is important, how do you think the advice and support on each of these matters could be best provided?

Welsh Government needs to take the lead and provide guidelines in conjunction with the WLGA.

Q24. 10b. Are there any other challenges or opportunities from structural change or providing additional powers and flexibilities that have not been identified above? If these areas require support, what form should this support take?

n/a

Q25. 10c. Which of the issues identified above or in your response should be prioritised for early resolution?

n/a

Page 6: Impact assessments

Q26. 11a. What effects do you think there would be?

n/a

Q27. 11b. How could positive effects be increased, or negative effects be mitigated?

n/a

Q28. 12. Please also explain how you believe the proposed policy within this consultation could be formulated or changed (if required) so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

n/a

Q29. 13a. Are there any positive or adverse effects not identified in the assessment?

n/a

Q30. 13b. Could the proposals be reformulated so as to increase the positive effects or reduce any possible adverse effects?

n/a

Q31. 14a. Are there any other positive or adverse effects not identified in the assessment?

n/a

Q32. 14b. Could the proposals be reformulated so as to increase the positive or reduce any possible adverse effects?

n/a

Q33. 15. Please provide any other comments you wish to make on the content of this consultation.

Wales has waited long enough for stronger and larger local authorities to be created. Now is the time for action and to move forward to implement the proposed changes, preferably by 2022. Only in this way can the ongoing negative impact of the UK government's austerity programme be challenged and mitigated. Small authorities simply do not have the resources to do this.

Page 7: Submit your response

Q34. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name

[REDACTED]

Organisation (if applicable) National Advice Network Wales

Q35. If you want to receive a receipt of your response, please provide an email address.
Email address

[REDACTED]

Q36. Telephone

[REDACTED]

Q37. Address

[REDACTED]

[REDACTED]

Port Talbot

[REDACTED]

Q38. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response

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Our Ref / Ein cyf: HD/KLW Your Ref / Ein cyf: LR / HIRST

Date / Dyddiad: 13th June 2018

Alun Davies AM
National Assembly for Wales
Ty Hywel
Cardiff Bay
CARDIFF
CF99 1NA

Dear Alun

RESPONSE OF BRIDGEND COUNTY BOROUGH COUNCIL TO THE STRENGTHENING LOCAL GOVERNMENT GREEN PAPER

Introduction

Thank you for the time you have taken to meet with Leaders individually and collectively in recent months.

This response has been prepared and agreed by the Leaders of the five political groups represented on Bridgend County Borough Council (BCBC).

We endorse the submissions made by the Welsh Local Government Association (WLGA) on behalf of Local Government in Wales and we endorse the response submitted by the Cardiff Capital Region (CCR). Whilst we wish that endorsement to be recognised fully, we have sought to avoid repeating in detail the points already made within both submissions.

As both the WLGA and CCR submissions make clear, we regard debate on the number and size of local authorities to be a sterile debate – there is no clear business case that demonstrates that performance or opportunity is proportionate to size of authority, there is still no clear indication that the costs of change are fully understood or deliverable (previous assertions by Welsh Government that this could be funded from reserves are not credible). In the case of Bridgend, we maintain prudent reserves but they are of a scale that would allow the Council to operate in the absence of all other funding for 9 days - this is nowhere near sufficient to address the fiscal and infrastructure changes associated with wholesale merger.

We have therefore chosen to focus our response on contributing some thoughts on how the role of Local Government might be developed, in order to have greater ability to meet the needs of our communities. These thoughts are not intended to be comprehensive but rather to illustrate the range of possibilities open to Welsh Government if it is serious in recognising that *“Wales needs strong, effective, empowered local authorities which can weather continued austerity and build local democratic structures fit for future generations”*¹.

The following examples highlight where we think the Welsh Government could choose to develop the responsibilities and powers of local government and in each case sets out a rationale for why this would be consistent with a vision for more effective local government, that is able to maximise impact for current and future generations. Each example builds on the existing strengths of local government – namely direct democratic accountability and an understanding of and focus on community and citizens.

Responsibilities

- **Health and Social Care Integration.** The case for integration is clear and much has been done in Bridgend as recognised in the Parliamentary Review and in recent research carried out by Unison. However, it is a fact that political and NHS managerial attention is consistently focused on acute services – operation waiting times, A&E admissions etc. Despite rhetoric that recognises the importance of preventative and community-based measures to reduce demand for acute services and enhance wellbeing, such services remain the “Cinderella’s” of the health care system.

We would therefore propose that the commissioning and co-ordination of community based health care be invested in local government. Local Government has a far stronger track record of financial management than the NHS. Local Government has a track record in targeted commissioning of a blend of health, social care and early help services, for example, through Flying Start.

- **Public Health.** Public health and specifically measures to address whole population public health were the genesis of local government in the UK. The majority of determinants of public health already reside with local government – for example in housing, public protection and land use and transportation planning. The current arrangements for public health in Wales are confusing. Local public health is embedded within Health Boards and, as such, the opportunities for significant whole system approaches to putting public health at the heart of service planning and place shaping are missed.

We would therefore propose that the Directors of Public Health and public health functions be invested with local government.

- **Regional Collaboration.** Both of the previous examples may well be more effectively discharged at a sub-regional level than individually 22 times. This would allow for greater economies of scale, for alignment with health boards and other public sector partners with a strong emphasis on the wellbeing of populations and individuals (criminal justice services for example). A regional approach would also allow for greater integration with other services that are already at various stages of regionalisation – social services, education and, in the case of the CCR – Transport and strategic land use planning.

We would propose that Welsh Government encourages and supports greater regional collaboration in two ways:

1. By providing financial assistance to overcome the cost of change – for example the support that Welsh Government provided to enable Bridgend, The Vale of Glamorgan and Cardiff to create a combined regulatory service was a significant contributory factor to our success.
2. By pooling central government resource at sub regional level instead of mirroring sub regions. Planning provides a good example of this; whilst the 10 south east Wales authorities are on a trajectory to introduce regional spatial planning and the necessary pooling of resource to achieve this, Welsh Government has been building up its own sub -regional teams to mirror this. This sort of approach leads to unnecessary increase in cost, added complexity and competition for skills. A more mature and efficient response would be for Welsh Government and local government to combine resources in examples such as these.

Powers

- **Post-16 Education Commissioning.** There is a clear case for Post-16 education to be better targeted to support economic growth. Through the Cardiff Capital Region City Deal (CCRCDD) we

have established mechanisms for local government and the private sector to come together and identify medium to long term skills needs. These are aligned with economic development objectives and would allow for the planning and delivery of a skilled workforce, that is able to meet the specific needs of our growing economy and increase opportunity of sustainable employment for our young people.

There is currently a disconnect between such identification of need and the commissioning of post-16 provision. We would therefore propose that further education commissioning is devolved – in our case to the CCR.

- **Control Over School Assets.** Bridgend, like many councils, is seeking to make the most effective use possible of its assets – including in particular its property and built assets. Wherever possible, we are seeking opportunities for multiple use and seeking to rationalise our estate as a response to austerity.

This is a difficult and complex agenda, made more difficult by the arrangements that pertain to the use of school premises. The 59 schools in Bridgend are publicly owned assets. In many cases, there is scope to collocate community services on school sites or for dual use of assets within schools, such as sports facilities and playing fields. Whilst we have some examples of being able to utilise assets in a way that meets the needs of the schools and of the wider community, such examples are extremely limited. Current legislation gives autonomy over the use of school assets to the governing body. The governing body is established with the specific interests of the school and therefore is not incentivised to allow any innovative uses of its assets, which would benefit the wider community – it is set up to prioritise the operational concerns of the school.

We would propose that Welsh Government addresses this situation and gives local authorities greater control over the use and operation of school assets for the benefit of the whole community.

- **Flexibility to Charge for Social Care for Those Who Can Afford It.** In Wales, the “Cost of Care” and associated caps prevent us from maximising income from those more able to afford support. This is in marked contrast to many other nations including England. We are therefore in a position of providing a range of services to a large number of residents who are well able to fund such support themselves, thus putting increased pressure on our ability to support those with greatest need.

The relaxation of this arrangement would not only allow us to focus diminishing resources on those with greatest need, it would also create a stronger market for self-funded social care – a market that local government as a significant provider could play into, thus creating a more sustainable source of funding for social care.

We would propose that Welsh Government removes the constraints on charging for social care to allow the benefits set out above.

Concluding Remarks

We are aware that many of the examples that we have given are outside the remit of the Cabinet Secretary for Local Government and Public Services. That in itself illustrates an important point. In practice, local government and our services are influenced by several different cabinet secretaries and departments; Education, Social Care, Financial Settlement, Planning, Regeneration, Transport, Culture and Environment are all within the remit of other parts of Welsh Government.

Therefore, we propose that Welsh Government recognises that a significant element of shaping and delivering a vision for better local government must encompass *all* branches of Welsh Government. We would propose that Welsh Government needs mechanisms to ensure that it is able to be more coherent in its approach to working with local government.

Finally, we would make one observation that is about scale and number of authorities; however, this is about town and community councils. Where they exist, town and community councils operate at very different scales – depending on the nature of their community. Thus in Bridgend we have some

quite large bodies such as the town councils for Maesteg, Porthcawl and Bridgend and a range of smaller bodies all the way down to our most rural community councils that serve population of a few hundred households.

There is no problem with this variation until we reach the current situation where there is both an appetite and expectation for town and community councils to play a more direct role in service provision. The underlying variation in scale can lead to an inequitable ability for community needs to be met and problems around potential double taxation.

We would propose that Welsh Government includes a clear understanding of the role of town and community councils in ensuring equitable services in any vision for local government.

BCBC would welcome further dialogue with Welsh Government on any or all proposals contained in this response.

Yours sincerely



Councillor Huw David
Leader of Council

Councillor Norah Clarke
Leader of the Opposition and of the Independent Alliance Group

Cllr Tom Giffard
Leader of the Conservative Group

Cllr Malcolm James
Leader of the Plaid Cymru Group

Cllr Ross Penhale-Thomas
Leader of the Llynfi Independents

Rydym yn croesawu gohebiaeth yn y Gymraeg. Rhowch wybod i ni os yw eich dewis iaith yw'r Gymraeg. We welcome correspondence in Welsh. Please let us know if your language choice is Welsh.

¹ Introduction to the Green Paper by Cabinet Secretary Alun Davies AM

South Wales FM To LG

Dear First Minister,

I hope the Assembly puts its weight behind Alun Davies and we get new Counties. The ones we have are not working. I fear we will have the same kind of hotchpotch we have now. Last time there was change we were all lumped together with people we had no connection with. We had industrial former mining areas joined to rural areas. What we have now especially in South Wales is not working. The Councils pretend to work together but it's all a sham. They will all fight tooth and nail not to change. It will take someone really strong to get the change needed. It was all done far more carefully in England. Why there is this need to have the same number of people in each area is beyond me. The areas with large cities in them should have more. Just look at London and what it generates. It feeds out to the areas around London. In South Wales because of the hills it's far easier to travel north south than it is to travel east west. Most of our major roads run ~~east west~~ north south as do our railways. That should be taken into account when drawing up the County Seats. Swansea is the obvious choice for the western part of Glamorgan etc. while Newport has an obvious link with the valleys north of it. What we have now is killing Wales. Please let's get it done quickly. We need the change now before Brexit takes place.

Yours faithfully
C. Jones

Annex C: Consultation Questions

Your Name	Councillor David Poole, Leader
Organisation (if applicable)	Caerphilly Labour Group
E-mail / Telephone	davidpoole@caerphilly.gov.uk
Your Address	Caerphilly County Borough Council, Penallta House, Tredomen Park, Ystrad Mynach, CF82 7PG

You can find out how we will use the information you provide by reading the privacy notice in the [consultation document](#).

Chapter 3

Consultation Question 1

In Chapter 2, we restated our commitment to regional working in key areas but recognised the need for this to be supported by further change. In chapter 3, we set out the broad options for moving toward fewer, larger local authorities and summarise features of the process which would be common to each option.

- a) What practical steps could the Welsh Government take to make current regional working easier and more effective, for example in relation to education consortia, social services and the City Regions and City and Growth Deals?

It must be made clear from the outset that the success of the City deal cannot be improved by having less but larger Authorities. The strength of the City Deal is that each of the 10 Councils bring to the table political and practical views on all aspects for the City Deal. Less Authorities would dilute this input.

It would be helpful if Welsh Government sets the outcomes it requires for regional working and let the Authorities devise and implement changes to achieve these outcomes. The first step being establish if there is a business case for the proposed outcomes.

- b) What are your views on the common elements to the process of mergers we outline in this section?

The missing element of mergers will be costs and an evaluation of the benefits not to Authorities but to the residents who are recipients of services. The costs saving in the Williams Report; back office, less admin etc, have already been made by Authorities through austerity budget reductions. The Williams Report is 4 years out of date both operationally and financially.

- c) What are your views on the options for creating fewer, larger authorities which we have set out?

The case once again is not made for the wholesale re-organisation of Welsh Local Authorities. It would appear that there is very little understanding of where Local Authorities are today. The proposals rely on historical information which is out of date. Again if Welsh Government set out what they wish to achieve, Councillors with in-depth knowledge of Local Authorities would be able to advise on how these outcomes can be achieved. Don't strip down the machinery of all the Authorities to repair the small parts that require modifying.

d) Are there other options for creating fewer, larger authorities we should consider?
No
e) Do you have evidence on costs, benefits and savings of each option which can inform decision-making? If so, please provide details.
Evidence exist that show that the 1974 and the 1996 Local Government re-organisation were more costly than predicted. There is no reason to believe that the Green Paper proposals will be different.

Chapter 4
<u>Consultation Question 2</u> Chapter 4 has explained the need for clarity on the future footprint for local government and the range of factors which should be taken into account to determine a new configuration. It sets out a suggested future footprint for local government, which could be reached via each of the options set out in the previous chapter.
a) Do you agree that providing clarity on the future footprint of local government is important?
Not implementing Local Government re-organisation would give the greatest clarity to residents. It must not be forgotten that Local Authorities' are about the efficiency, delivery and costs of its service not about the size of the Local Authority. The views of residents, communities and service users are sadly lacking from the Green Papers.
b) Do you agree with the factors we have identified to inform our thinking? Would you change or add any?
We do not believe Welsh Government has taken into account of all factors to inform your thinking. The paper has formed the view that Local Authorities are broken. This had been arrived by using outdated data.
c) What are your views on the new areas suggested in this section?
Unworkable in that it removes Local Authorities further from its residents in terms of democracy and decision making. Residents will be alienated from

<p>their Council by the sheer size of the proposed mergers.</p>
<p>d) Do you have alternative suggestions and, if so, what is the evidence to support these as an alternative?</p>
<p>Tell Local Authorities what Welsh Government perceives what is wrong with Local Authorities and leave Councils through the WLGA to take action to resolve the conditions.</p>
<p>e) In the context of these proposals, are there other ways we should simplify and streamline joint working arrangements at regional level and among public bodies within the new authority areas? If so, what are they?</p>
<p>Public Services Board should match the footprint of the Health Authority. Most of the improvements sought and performance indicators used are regional i.e. Police, Health Boards etc. have regional performance targets.</p>

<p>Chapter 5</p>
<p><u>Consultation Question 3</u> Chapter 5 sets out the proposed approach to transition and implications for establishing Transition Committees and elections to Shadow Authorities under each option.</p>
<p>a) Do you agree with the proposed process of transition: namely establishing Transition Committees and ensuring elections to Shadow Authorities can be held ahead of vesting day for the new authorities?</p>
<p>This question is based on the assumption the re-organisation is good for Local Authorities and for Wales. This view is not shared by Caerphilly Labour Group, therefore we do not have a view on transition committees.</p>
<p>b) Do you agree that, if option 1 were pursued, we should set a date by which voluntary merger proposals should come forward in each electoral cycle?</p>
<p>See answer (a) above</p>

c) Do you have any other thoughts on the proposed process?
No
<u>Consultation Question 4</u> The consultation suggests holding any local government elections in June 2021. Are there any reasons why June 2021 would not be a suitable date? If so, please suggest an alternative date with the reasons why that would be more suitable.
June 2021 would be acceptable for voluntary mergers.
<u>Consultation Question 5</u> The Welsh Government recognises that there are some plans or assessments, for example the preparation of assessments of wellbeing by Public Service Boards, which are linked to electoral cycles. We will make provision to make sure these tie into any new electoral cycles going forward. Are there any other plans or matters which might be tied into the electoral cycle which we need to consider?
Corporate plans.
<u>Consultation Question 6</u> What are your views on the approach which should be taken to determining the parameters of electoral reviews?
There is a danger that wards would become too big for Councillors to consult, support, represent and engage with residents and communities. The present wards sizes allow Councillors to deliver all the activities mentioned above.

Chapter 6
<u>Consultation Question 7</u>
a) How can councils make more effective use of their elected members knowledge of, and connections in, their communities?
It is important that Councillors have access to the latest IT equipment to enable them to use the data, reports and decision on their Council Website. The equipment would also enable the councillors to see via the world wide web others views, opinions and solutions contemplated or implemented by other Councils. Pre-Scrutiny of impending Cabinet reports would allow Councillors to express their views before a decision is made. Such views would then be considered when making a decision.

b) How could we better recognise the level of responsibility involved in being a local councillor? What changes to the remuneration and support councillors receive would enable a wider range of people to become involved in local democratic representation?
<p>There is a wrongly held believe by Welsh Government now and in the past that there is a sort of untapped talent and diversity, waiting to be Councillors. The role of Councillors has become more difficult since the wide spread use of Social Media.</p> <p>Councillors are underpaid and undervalued and until the role and time commitment of Councillors are widely understood by the public that view will not change.</p> <p>Local Government re-organisation by Welsh Government will only reinforce the view that current Councillors have not had a role commensurate with their remuneration.</p>
<u>Consultation Question 8</u>
a) Are there other powers which local government should have? If so, what are they?
<p>Power of competence would release latest ideas and be more innovative in designing and delivering services for its residents.</p>
b) Are there other freedoms or flexibilities which local government should have? If so, what are they?
<p>Those powers mentioned in the Green Paper would be a starting point with other powers delegated as Local Authorities confidence grows.</p>
<u>Consultation Question 9</u>
a) Which areas offer the greatest scope for shared transactional services?
<p>The areas with the greatest people for shared services have already been implemented on a voluntary basis or through the City Deal.</p> <p>There is a continual view in Welsh Government that “Big” is better, and that expertise will only be realised in large Authorities. This shows a complete lack of understanding of Local Government and under mines the value of staff in</p>

<p>the current Authorities.</p>
<p>b) How might such arrangements be best developed?</p>
<p>This should only be carried out if there is a demonstrable sound business case that demonstrates a measurable benefit to residents.</p>
<p><u>Consultation Question 10</u></p>
<p>a) In ensuring we deliver a consistent approach across Wales, where consistency is important, how do you think the advice and support on each of these matters could be best provided?</p>
<p>Consistence in service delivery is not seen as an important issue in Local Government. Each service over the last 22 years has been designed on the basis of what is best for the residents of each Authority. What is best for a rural Authority will not be best for an urban Authority. Some services have also been redesigned based on budgets which in their selves is based on what the residents tell their Authority what is important</p> <p>Practical support from Welsh Government is of no use if scarce funds are being used to finance Local Government re-organisation. We will not be thanked for committing finance away from service delivery as with happen with re-organisation.</p>
<p>b) Are there any other challenges or opportunities from structural change or providing additional powers and flexibilities that have not been identified above? If these areas require support, what form should this support take?</p>
<p>There is an assumption that support from Welsh Government will made re-organisation more palatable. This is a wrong and dangerous assumption.</p>
<p>c) Which of the issues identified above or in your response should be prioritised for early resolution?</p>
<p>None of them. Scarce finance should not be taken form Local Authorities to fund an ill thought out and ill conceived idea like Local Government re-organisation.</p>
<p><u>Consultation Question 11.</u> We would like to know your views on the effects that the proposals within this consultation would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.</p>
<p>a) What effects do you think there would be?</p>
<p>The Welsh Language is irrelevant in the context of Local Government re-organisation. The Welsh Language Act does not distinguish between large</p>

small Councils.
b) How could positive effects be increased, or negative effects be mitigated?
There is no perceived positive effects of the Welsh Language Act is correctly applied. The argument that a large Authority will be able to deploy more staff to increase the use for Welsh is not supported by any evidence or strong views of the Welsh Language Commissioner.
<p><u>Consultation Question 12</u></p> <p>Please also explain how you believe the proposed policy within this consultation could be formulated or changed (if required) so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.</p>
Strengthening the use of Welsh and the opportunities can be achieved quicker and at a greatly reduced cost than that of re-organisation by making changes to the Welsh Language Act.
<p><u>Consultation Question 13</u></p> <p>The Children's Rights Impact Assessment published alongside the consultation outlines the Welsh Government's view of the effect of the proposals contained in the consultation on children and young people. The Welsh Government seeks views on that assessment.</p>
a) Are there any positive or adverse effects not identified in the assessment?
No
b) Could the proposals be reformulated so as to increase the positive effects or reduce any possible adverse effects?
The setting up of a Youth and Young People Forums with access to Cabinets, Scrutiny Committees and Public Services Boards would allow young children to influence the Authorities decision making process.
<p><u>Consultation Question 14</u></p> <p>The Equalities Impact Assessment published alongside the consultation outlines the Welsh Government's view of the effect of the proposals contained in the consultation on protected groups under the Equality Act 2010. The Welsh Government seeks views on that assessment.</p>
a) Are there any other positive or adverse effects not identified in the assessment?
No

b) Could the proposals be reformulated so as to increase the positive or reduce any possible adverse effects?

No

Consultation Question 15

Please provide any other comments you wish to make on the content of this consultation.

Throughout the consultative process and by the questions posed there is a assumption that Local Government re-organisation will take place in one form or other.

The question must be asked “What is wrong with Local Government that re-organisation will solve?” This has not been highlighted and therefore no argument has been offered by Welsh Government to support their flawed view that re-organisation is a panacea for all problems.

The costs of re-organisation has not been fully costed but merely estimated it at between £97m and £246m. The former figure would damage all services and the latter will destroy the very fabric of local services. The Green Paper offers warm words such as “support” through workforce development, digital developments. Again there is an assumption that this has not taken place by most Authorities.

The Green Paper offers a Civil Servants view of local Government which is outdated and lacks substance or detail. It is a view that has been the constant thread of 3 Cabinet Secretaries.

The way forward is to debate and discuss Welsh Governments concern with all local Authorities through the good office of the WLGA.

Finally Caerphilly Group supports option 1 where a sound business is demonstrated.

Annex C: Consultation Questions

Your Name	Christina Harray, Chief Executive (Interim)
Organisation (if applicable)	Caerphilly County Borough Council
E-mail / Telephone	HARRHC@CAERPHILLY.GOV.UK
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You can find out how we will use the information you provide by reading the privacy notice in the [consultation document](#).

Chapter 3

Consultation Question 1

In Chapter 2, we restated our commitment to regional working in key areas but recognised the need for this to be supported by further change. In chapter 3, we set out the broad options for moving toward fewer, larger local authorities and summarise features of the process which would be common to each option.

- a) What practical steps could the Welsh Government take to make current regional working easier and more effective, for example in relation to education consortia, social services and the City Regions and City and Growth Deals?

This Authority is only in favour of regional working when it is supported by sound business cases, that make sense in terms of service improvement/efficiency and, importantly, where there are demonstrable benefits to the residents of Caerphilly.

Regional working for Caerphilly County Borough has an established history on what is ostensibly known as the 'Gwent' or 'Greater Gwent' footprint. More latterly, and to support the Cardiff Capital Region City Deal, the footprint for partnership working has extended over the 10 authorities in south east Wales. Regional working has often been mandated by Welsh Government policy, legislation and funding with a requirement that local delivery of Welsh Government policy must be on a footprint most often coterminous with the local health board and police force. For Gwent this is a neat package as both main partner bodies are also coterminous. Hence we have established close working relationships with the five constituent local authorities in the area and our wider partners. We recognise the arguments of the Williams Commission that smaller local authorities were more likely to be challenged in delivering resilient and sustainable services. Since when, the impact of austerity has worsened, and we would assume that a similar examination now may paint a bleaker picture. However, Caerphilly County Borough Council is the largest local authority in the Gwent footprint and, while decreasing budgets have been, and continue to be, a significant challenge, it has not suffered to the extent of smaller neighbours and other authorities in Wales. In a time of scarce financial resources, even for stronger authorities, we cannot see that a wholesale local government reorganisation is something that should be considered, the financial benefits are debatable at best.

Reforming Local Government: Resilient and Renewed proposed mandated regional working. We contend that was yet another imposition from Welsh Government that had the potential to add another layer of complexity to local governance and accountability. The recent history of regional working has been predicated on a need to follow policy direction in some cases, regional funding in others, or legal

requirements in others. None of this has offered any level of consistency in the decisions that have effectively mandated regional working through these blunt tools. Different Cabinet Secretaries, and notably Divisions, within Welsh Government have had different approaches resulting in a plethora of governance arrangements and we would argue very much less accountability. The result is a complex latticework of regional working, governance boards and officer groups not all of which are required to have democratic oversight, or if they do this is repeated five times over in each local authority in Gwent.

However, health and social care and educational achievement are examples where scale has the potential to bring benefits to service delivery. For health and social care our key health board partner should benefit from lack of repetition across five authorities and while it is difficult to navigate issues such as pooled budgets there should be some perceptible benefits for service users in a fully integrated health and social care system. We anticipate that the outcome of the recent Parliamentary Review will move us further along this path.

Likewise for educational achievement and some specialist services where resilience can only be achieved by bringing expertise together to support service delivery there should be some tangible benefits on the front line.

However, there have been examples where there have been no identifiable benefits to service users where regional working has been predicated on following hypothecated funding streams and the requirement to produce Gwent level business plans that we would argue has had no benefit on the front line not least because the delivery agents, the services and community organisations that we co-deliver with, are local. This has often resulted in service managers having to jump through hoops to satisfy Welsh Government, diverting time, effort and energy from what is important to us; effective, responsive local services.

Economies of scale should be a significant driver in regional working. Local government reorganisation in 1996 broke up large spending services like highways, education and social services and while the financial landscape was relatively healthy these smaller geographies have been more responsive to local need, more democratically accountable and delivered more effectively. The financial challenges since 2008 have meant that larger local authority services have, necessarily in the case of social care and education, had to be protected at the expense of others resulting in resilience challenges as budgets and capacity have been lost. However, mandating regional delivery for services that are facing resilience challenges comes with its own level of complexity. Not least the financial issue of pooled budgets and the governance issue of service level agreements that place more risk and less certainty on front line provision when the only driver is saving costs. Long term commitment to partnership is problematical when the member authorities of such arrangements have different political landscapes and different financial resilience. Arm's length services face a 'race to the bottom' to find the minimum acceptable level of service that suits all members. There is a 'governance gap' in such arrangements with less local democratic oversight and scrutiny, unless robust regional scrutiny is in place. Large collaborations and their governance arrangements such as the City Deal Joint Cabinet have clear value as the benefits brought to the area have the potential to change generational outcomes for the

better. Collaborations on a smaller scale should be based on sound business cases with demonstrable benefits, or they risk being less likely to be worth this democratic input and less responsive to local need.

Collaboration and regional working should not be mandated by Welsh Government. Local authority leadership has the maturity and expertise to determine the most appropriate delivery model, collaboration is one of them, which would work best for local citizens at the front line, and which will not bring improved delivery outcomes and greater sustainability for services. We have some notable examples of successful regional working including the City Deal, Valleys Task Force, Blaenau Gwent and Caerphilly Youth Offending Service, Gwent Frailty Programme, Gwent Missing Children Project, Blaenau Gwent and Caerphilly Social Care Workforce Development, South East Wales Emergency Duty Team, Prosiect Gwyrdd etc.

To assist the effectiveness of existing collaborative approaches and enhance further collaborations, Welsh Government must actively support further “double devolution” – i.e. devolution of powers to the local level. This has area has not progressed at the pace required to support the collaborations, in areas such as the Cardiff Capital City Region, City Deal.

b) What are your views on the common elements to the process of mergers we outline in this section?

Caerphilly County Borough Council retains its position that a stand-alone Authority is the best outcome for our communities, although our extensive collaborative working across the region, and notably, our participation in the Cardiff Capital Region City Deal is highly valued by the Council.

Outside those regional collaborations mentioned above, or those which we would seek to strengthen with our neighbours for service resilience purposes, we remain unconvinced that the financial arguments for local government mergers are made robustly. The last detailed proposals were drafted in 2015. Since then there is significantly less money in the system that might be available to cover the hidden and transparent costs of wholesale restructure. The cost benefit equation does not seem to be borne out any longer, even with a ten year horizon to recoup the savings benefits this seems overly ambitious and unachievable. We note the intention to revisit the calculations and will respond if further information becomes available.

We have managed to support front line services thus far, even facing the ongoing challenges, and so the argument that services suffer from unsustainable costs and overheads has not materialised in this authority. Our Medium Term Financial Planning has been robust and prioritised the front line. We have revisited our financial planning principles for the period 2018-2023 and will continue to emphasise front line services and services to vulnerable people.

We have regarded Option 1 Voluntary Mergers as largely the status quo and so will confine this consultation response to Option 2 Phased Approach, and Option 3 Comprehensive Mergers.

c) What are your views on the options for creating fewer, larger authorities which we have set out?

Caerphilly County Borough Council retains its position that a stand-alone Authority is the best outcome for our communities. We are even more perplexed that the line has been drawn around ourselves and Newport City Council than we were with the map drawn by Williams for a merger of the three West Gwent authorities, and the 2015 statement by Leighton Andrews for a merger of the 5 Gwent authorities. At the time we stated that this authority is large enough and robust enough to stand alone. We maintain that stance. Please see further in this response as to why we believe that Welsh Government have made a fundamental error in this latest footprint for reorganisation.

This paper has gone as far as to consider the process for reorganisation as opposed to concentrating on the reasons why the footprint has been chosen. We suggest that a step back should be taken and a greater examination of the key data and financial information is required before considering process, particularly for the footprint proposed affecting this authority.

We are extremely concerned at the mention of an emergency power to merge a seriously failing authority with a stronger neighbour, or neighbours. We suggest that existing powers for commissioner run authorities under the Local Government (Wales) Measure 2009 should be sufficient to support authorities in difficulty.

As explained we do not intend to dwell on Option 1 although we note that previous voluntary merger proposals were rejected wholesale by the then Cabinet Secretary. We regard this option as one which is available to us albeit we fundamentally disagree with the proposed footprint within which we would be restricted i.e. should we chose to take this path we can only merge with Newport City Council. Option 2- We would not be seeking a voluntary merger within our 'permitted' footprint by 2022. For authorities that would be seeking such mergers, and for Option 3, we think that the timescale is too challenging. A new Local Government Bill is unlikely to emerge in sufficient time to allow this to happen. We note that the Assembly considered that it was unlikely to have the mandate to support the last draft Local Government (Wales) Bill when it began this term. We wonder, therefore, what has changed that now makes the progression of a new Act more likely.

Mandated merger by 2026 offers a more realistic timescale however we respectfully request that you do not consider this statement as our support of a merger programme, as set out in the green paper, for Caerphilly County Borough Council. We agree that allowing some authorities to merge, if they were minded to, and others to wait until a statutory deadline would present a confused delivery landscape across Wales.

Option 3- This really is an impossible timescale. We fail to see how the political backing for a Bill could be achieved in time to allow full and comprehensive merger by the 1st April 2022 across the whole of Wales. Not least, we do not see that we have the leadership capacity to drive through change of this scale and pace in

<p>addition to existing challenges. There are significant risks in pursuing this option that will undoubtedly pervade through confusion, haste, ill-considered decisions, poor accountability, and reduced quality of front line service.</p>
<p>d) Are there other options for creating fewer, larger authorities we should consider?</p> <p>The proposed merger of authorities as proposed will have a detrimental impact upon the £1.2bn economic investment programme of the Cardiff Capital City Region City Deal. The terms of reference and other supporting documentation forming the governance of the City Deal is predicated upon the 10 sovereign local authorities. If the proposed mergers were to take place, this would require the total reconsideration of the make up on the City Deal and the associated governance framework – essentially starting again “from scratch”. This distraction would likely affect the achievement of the agreed “gateway targets” focussed upon economic growth. These would not be met and the funding would be lost and more importantly a unique opportunity for the south east Wales region would be lost.</p> <p>Furthermore, another associate consequence to the City Deal if mergers were to take place is one of capacity. The Joint Cabinet consisting of 10 Leaders and Chief Executives is leading the direction and pace of the City Deal investment programme. If mergers were to take place, the Chief Executive capacity currently within the City Deal Joint Cabinet, would be lost, as inevitably, the Chief Executive’s focus would be on developing the required organisational and workforce changes associated with the creation of new Councils.</p>
<p>e) Do you have evidence on costs, benefits and savings of each option which can inform decision-making? If so, please provide details.</p> <p>The last calculations undertaken by Welsh Government on this issue were to support the last draft Bill in the 2014/15 financial year. These envisaged a 10 year return on cost. Four years on we believe that that any savings on offer may have significantly diminished as authorities are continually reducing overheads and back-office costs. A recalculation must be undertaken to evidence decision making. While authorities face continuing austerity it is impossible to predict how funding and increasing service pressures will balance out. However, we have a strong track record of managing these constraints on service delivery and would argue that the uncertain financial landscape is not the time to be considering wholesale reorganisation. At best this will be a distraction from continuing to deliver high quality services responsive to local need. At worst it will undermine the effective practice that has supported us through this difficult period up until now by creating a drain on strategic managerial capability that we simply do not have in these challenging times.</p> <p>CIPFA recommended in 2015 that any boundary drawing should be independently completed and should be agreed based on public service provision and the ability of proposed authorities to meet local need. Further they suggested that the regulatory impact assessment did not assess the full costs for councils. The regulatory impact assessment suggested reorganisation costs of over £200 million to local government for issues such as staff and estates costs, redundancy and rebranding, etc. CIPFA’s</p>

estimates were between £160 and £268 million. We suggest that the proposed savings are no longer there to make this viable.

Since 2008 we have achieved cumulative savings of over £88,900,000. Since 2014-15, when the last regulatory impact assessment for reorganisation was done, we have taken over £52,400,000 out of our budgets. The percentage annual savings requirement increased significantly from 2014-2015. Any revised assessment of cost and benefit must recognise the very different financial landscape, even four years on.

We cannot see any clear efficiencies set out in the paper other than a statement that they will be the answer to allowing us to deliver more for less. Neither have we experienced difficulties in recruiting and retaining staff, taking the whole authority into consideration. Any new regulatory impact assessment must take account of the new landscape and should set out very clearly what the proposed efficiency savings are and what assumptions have been used in making the new calculation.

We would be particularly interested to see some quantification of the anticipated social benefits in a new regulatory impact assessment.

Chapter 4

Consultation Question 2

Chapter 4 has explained the need for clarity on the future footprint for local government and the range of factors which should be taken into account to determine a new configuration. It sets out a suggested future footprint for local government, which could be reached via each of the options set out in the previous chapter.

a) Do you agree that providing clarity on the future footprint of local government is important?

We agree that the alignment of regional boundaries with that of our key delivery partners has advantages and, as we have stated, for the area we all call Gwent, this is neatly the police, and local health board. Similarly we agree with previous Welsh Government policy not to disaggregate the existing authorities. Responsive local democracy and robust scrutiny should be maintained but we are not convinced that the economic and social benefits are set out. We also maintain that Welsh Government should not legislate against local government collaboration on an alternative footprint where there are clear, demonstrable benefits of doing so.

Our response to the Draft Local Government (Wales) Bill 2015 expressed our concern that a 'Gwent' authority would be too large and not in touch with the needs of local communities. We maintain this view.

Our response to Reforming Local Government in 2014 stated that this authority, as the 4th largest by population and population density, the 5th largest by number of households, and with the 5th largest revenue budget and staffing, is big enough and resilient enough to stand alone. However, it is accepted that this position is not

replicated in the smaller authorities.

The proposed merger footprint, placing this authority with Newport, makes less sense than the 2014 proposed West Gwent merger. The differences between Caerphilly County Borough and Newport City Council are marked. We cannot comprehend the decision making that has arrived at this proposal other than a broad equality of population for the 10 proposed local authority areas. Caerphilly County Borough is a semi-rural authority with 80% green space, and several principal towns and villages dispersed along the valley bottoms, often aligned to former mining communities. The existing border between this authority and Newport City Council is short in comparison to the total border and land area, effectively creating a pinched elongated proposed authority that will come with associated costs and difficulties in managing services over a geographically dispersed area. There are only three transport routes connecting the two authorities, the B4591 through the residential area between Rogerstone and Risca, the A467 Risca bypass, and the A468 connecting through sparsely populated rural Lower Machen. The costs in managing whole authority services across this divide should be factored into any consideration of mandated merger. We suggest that the area would have to continue to function as two, even if merged, with the associated costs and repetitions of service bases/depots etc. Practically there is only one real connecting thoroughfare that could be used to move service provision around the combined authority, the A467.

Capital asset rationalisation would not be achieved beyond that which the authority is currently exploring with its Public Services Board partners. We suggest that Welsh Government look again at the flow between the two areas and consider what economies of scale and resilience are practically achievable.

The settlements in Caerphilly County Borough range from smaller towns and more isolated villages in upland areas to larger conurbations in the Caerphilly Basin and Mid Valleys East area. There are five principal centres (Caerphilly, Blackwood, Risca, Bargoed and Ystrad Mynach) supported by four local areas (Newbridge, Rhymney, Nelson and Bedwas). The county borough is a mixture of urban and rural communities. Overall the county borough comprises 50 distinct towns and villages. Three quarters of the borough is used for agriculture and forestry. However, the health of the area is comparatively poor with 8.6% of males and 7.8% of females, aged 16-74, long term sick or disabled. The percentage of workless household is higher than the Welsh average as are the numbers of ESA and Incapacity Benefit claimants. Employment patterns are higher than the Welsh average for manufacturing and skilled trades.

In comparison to Caerphilly county borough, Newport is a small coastal city with a much more ethnically diverse population concentrated around the city centre, with a relatively few more affluent outlying areas. Housing density is higher with more residents living in flat/maisonette/apartments. Employment is more likely to be in retail and service industries.

Caerphilly County Borough Council has retained its Housing stock and delivers its Sport and Leisure Service in house. Newport City Council no longer retains these services.

In general, we believe that the data presented by Welsh Government in Annex B is selective and has not provided a sound basis for the decision that has proposed this merger. A better assessment would consider the possible future demands on public services and should particularly consider topographical constraints.

Caerphilly County Borough Council retains its position that a stand-alone Authority is the best outcome for our communities.

The Independent Group on Caerphilly County Borough Council believe there are currently too many local authorities within Wales and numbers should be reduced through consultation. Not a forced merger with Newport City Council which is flawed, with this the only option from the Minister.

b) Do you agree with the factors we have identified to inform our thinking? Would you change or add any?

We note the factors have included ensuring democratic accountability is maintained and that authorities are of sufficient scale. Our response to the scale argument is set out above. We do not believe that the factor described for how authorities relate to and take account of their communities has featured very strongly in the decision to draw a line around Caerphilly County Borough and Newport City Council. The areas are vastly different. The recently released Thriving Places Index for Wales show that the economic, social, environmental and cultural positions of the two authorities differ markedly in several respects. The demography and landscape, relative deprivation, health challenges and post-industrial factors are significant. Whereas Caerphilly scores highly for sustainability and income inequality it has more significant health challenges. Newport conversely has poorer community safety and cohesion indicators but less deprivation. This data is not surprising given the difference in rurality, industrial legacy, community diversity etc. The public sector response to the well-being of both areas is different and cannot be managed in the same way across both.

The data tables in Annex B of the consultation are quite selective. The differences in staffing, particularly social services staffing are notable. We are aware that there is more outsourcing of social services provision in Newport City Council. We have not outsourced services to the same extent. We are concerned that rationalisation of provision could affect our population. An issue which is of concern for us given our aging population and escalating demand.

We would suggest that the issues that impact on public sector demand should be more clearly examined in any comparison data. There is little beyond basic age related demographics and population density presented. Without an assessment of how available resources can meet demand any paper exercise is badly informed. The environmental differences between each authority are quite distinct, support for rural industries and protection of our outstanding natural environment are issues we fear could suffer in a combined authority. Likewise we are concerned that our more deprived northern valleys communities may not fare well in any resource allocation when compared to the social problems facing a diverse city area.

c) What are your views on the new areas suggested in this section?
Please see above.
d) Do you have alternative suggestions and, if so, what is the evidence to support these as an alternative?
No alternative suggestions, Caerphilly County Borough Council retains its position that a stand-alone Authority is the best outcome for our communities, but the Council is willing to enter focussed discussions regarding the sustainability challenges facing other Authorities.
e) In the context of these proposals, are there other ways we should simplify and streamline joint working arrangements at regional level and among public bodies within the new authority areas? If so, what are they?
<p>Splitting the current Gwent area into two does not facilitate joint working with our Police and Health Board partners as they would be working with two local authority areas. All relevant Welsh Government policy and legislation thus far has driven Gwent wide working. Is the assumption that the structures that have grown up around this footprint would be dissolved? If that is the case it is yet another directional turn that Welsh Government would require of local authorities. Presumably the desire to create larger authorities would suggest that regional working would become less necessary? Where collaboration across Gwent had made sense for us in a business delivery perspective it has worked well. We maintain that we have the maturity and expertise to determine what produces the best outcomes for our populations and where regional working assists us and, importantly, where it does not. We have good working relationships with our partners in Gwent and do not see that creating larger local authorities would add any benefits to regional cross-sector working.</p> <p>Regional economic development is working across a much wider footprint than Gwent and has proved that boundaries on a map are no barrier to shared commitment and understanding. The City Deal footprint too, is also offering tangible benefits now and for the future.</p> <p>The Public Services Boards (PSBs) across Gwent collaborate, although the local assessments of well-being are very different, and hence Boards need to be responsive to their local populations. The Gwent PSBs are working to ensure consistency of delivery across the area with a coordinating officers group agreeing matters of consistency and alignment with the Regional Area Plan for social care. Delivery for the Area Plan and Well-being Plan will rely on local delivery partners in each area, particularly for communities and the third sector.</p>

Chapter 5
<p><u>Consultation Question 3</u></p> <p>Chapter 5 sets out the proposed approach to transition and implications for establishing Transition Committees and elections to Shadow Authorities under each option.</p>
<p>a) Do you agree with the proposed process of transition: namely establishing Transition Committees and ensuring elections to Shadow Authorities can be held ahead of vesting day for the new authorities?</p>
<p>We would point out that the Leader and Cabinet are currently focussed upon the Cardiff Capital Region City Deal and rightly so, as this brings a more tangible prospect for improving the long term well-being of our communities. Any reorganisation will be extremely time consuming and, given the impossible timescales in Option 3, is neither realistic nor achievable. Similarly the senior officer support that would be required from Corporate Services is unlikely to have the necessary capacity in these challenging times. The authority has set itself an ambitious transformational change programme to meet the challenges it faces and improve services to the public, in the context of reducing budgets. Derailing the important work by requiring preparatory work to combine with another authority is an unwanted and unwarranted distraction that we cannot offer any positive response to.</p> <p>The creation of a Shadow Authority would be costly and will require the support of officers who would also be managing day to day business. Given the fact that savings in services has meant less staffing we cannot see where this support will come from. An inadequately resourced process introduces risks and instabilities to the existing authority, and the proposed new authority.</p> <p>Assembly Elections in May 2021 followed by Principal Elections to Shadow Authorities and Community Elections in June 2021 pose a real issue. These elections (which are already complex) may well be more so with new voting methods and franchises (16 year olds) and new initiatives like mobile voting all being introduced. From a voters point of view there is likely to be widespread confusion and voter 'fatigue'. The 'snap' General Election last year, after Local Elections, showed that we struggle with such a strain on resources.</p>
<p>b) Do you agree that, if option 1 were pursued, we should set a date by which voluntary merger proposals should come forward in each electoral cycle?</p>
<p>We have no view on this question as we do not envisage a voluntary merger either within our 'permitted' footprint or outside of it at this time. Caerphilly County Borough Council retains its position that a stand-alone Authority is the best outcome for our communities.</p> <p>We recognise the challenges facing the smaller authorities in terms of resilience and sustainability. Should Welsh Government take a view that it wished to bolster smaller authorities we would be prepared to enter into discussions. However, this may be subject to additional consideration around police and health board boundaries in a similar vein to proposals for Bridgend County Borough Council.</p>

c) Do you have any other thoughts on the proposed process?
<p>The proposed process is yet another policy direction from yet another local government Cabinet Secretary. The anticipated benefits of reorganisation cannot be justified against the resource costs involved.</p>
<u>Consultation Question 4</u>
<p>The consultation suggests holding any local government elections in June 2021.</p>
<p>Are there any reasons why June 2021 would not be a suitable date? If so, please suggest an alternative date with the reasons why that would be more suitable.</p>
<p>Please see answer to Question 3 a) above.</p>
<u>Consultation Question 5</u>
<p>The Welsh Government recognises that there are some plans or assessments, for example the preparation of assessments of wellbeing by Public Service Boards, which are linked to electoral cycles. We will make provision to make sure these tie into any new electoral cycles going forward. Are there any other plans or matters which might be tied into the electoral cycle which we need to consider?</p>
<p>As far as we are aware the following Welsh Government legislation also has timelines tied to electoral cycles:</p> <ul style="list-style-type: none"> • Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015- also aligns to ordinary elections- Section 6 • Social Services and Well-being (Wales) Act 2014- population needs assessment to be completed per electoral cycle, and Area Plan to be produced within one year of the needs assessment- Section 14A <p>It would be extremely useful if all this legislation were captured in the same way with a clear understanding of alignment to electoral cycles. It would be even more useful if the requirement for strategic assessment and planning could be streamlined and further aligned. In some cases the direction of these strategic plans is necessarily influenced by political view. In other cases this may be less so. Requiring several sets of high level assessment and planning on the same timeline is a pressure on partnership resources.</p>
<u>Consultation Question 6</u>
<p>What are your views on the approach which should be taken to determining the parameters of electoral reviews?</p>
<p>The Local Democracy and Boundary Commission for Wales is reviewing this authority in 2019 as part of their regular programmed work. Whether they have the resources to undertake the electoral reviews of the proposed new authorities would</p>

be a matter for them, although we wonder what capacity would be needed to review all authorities in Wales at the same time.

Chapter 6

Consultation Question 7

a) How can councils make more effective use of their elected members knowledge of, and connections in, their communities?

Members are key consultees on issues affecting their communities; they can often suggest solutions to problems and also provide links to local groups.

When Members are elected an audit of their skills and knowledge could be undertaken and people with particular areas of expertise identified. This could be used by the local authority when planning engagement and consultation with local communities.

Better use of social media, to allow Councillors to forward any concerns raised from their social media accounts. This would give Councils the opportunity to gather views on issues when there are views where the public may not be willing to engage in formal consultation.

b) How could we better recognise the level of responsibility involved in being a local councillor? What changes to the remuneration and support councillors receive would enable a wider range of people to become involved in local democratic representation?

The workloads of all Councillors are increasing, they are expected to be available 24/7 and the current remuneration does not reflect the time some councillors often allocate their various roles. In order to attract diverse and representative candidates there are a number of areas that could be addressed:

- Family Absence - the Local Government (Wales) Measure 2011 introduced Family Absence which allowed 26 weeks for maternity absence, 2 weeks for Adoption Absence and up to 3 months for Parental Absence. Surely it is unfair to only allow 2 weeks for adoption when families can be adapting to significant changes, and as Corporate Parents surely local authorities should be leading the way in supporting people considering adoption.
- The support as contained within the Annual Reports of the Independent Remuneration Panel are not prescriptive, therefore each Local Authority will interpret them differently. If the intention is to encourage people to consider Public Office from all walks of life, the support provided should be clearly defined so that there is no ambiguity surrounding what they can expect in terms of IT, telephones etc.
- If the plan is to reduce the number of Councillors and increase the ratio of constituents to Councillor, the level of support for members would need to increase, research support and, administrative support to organise their

workloads.
<ul style="list-style-type: none"> • A larger authority with fewer Councillors would decrease democracy as Councillors would become further detached from communities.
<u>Consultation Question 8</u>
a) Are there other powers which local government should have? If so, what are they?
<p>We agree that in many cases both tiers of Government in Wales are being expected to do the same job. This is not a sustainable position and we believe that local government is best placed to determine, and respond to, the needs of its communities.</p> <p>We would wish to reiterate our response to the letter from the Cabinet Secretary dated the 8th December 2017 in relation to powers and flexibilities:</p> <ul style="list-style-type: none"> • We ask that Welsh Government continues to reduce the number of specific grants by transferring funding to the RSG. • We would also like to move to three-year financial settlements. The difficulties for Welsh Government due to the lack of clarity in terms of its funding from the UK Government are understood, but this is something that needs to be considered given the scale of the financial challenge faced by the public sector. • There is currently some flexibility around the use of capital receipts for service transformation projects. It would be helpful to extend this further. • We agree that Local Authorities in Wales should be given the general power of competence so that they can explore more innovative ways of generating income. • Change Big Lottery Fund criteria to allow grant funding to support council-run community services, particularly those most at threat such as libraries and leisure centres. • Remove the Treasury Imposed cap on Housing borrowing allowing Welsh councils to borrow more for house building since the public sector clearly gains a bankable asset and there is no need for this to appear on the books as public borrowing. This would support the Welsh Government priority of building more affordable homes and also provide an opportunity for Local Authorities to lend to RSLs. • Renewed consideration of "green taxes" to protect the environment including charges on chewing gum, plastic bottles, and polystyrene packaging for takeaway foods, with the revenue being ring-fenced to local authorities to invest in street cleansing. • Greater freedom for Local Planning Authorities to get on with producing development plans that are delivered locally. Accepting that the role of Government is to set broad strategic priorities it is unnecessary and often unhelpful for LPAs to have to run development plans past counterparts in Welsh Government. Contrast that with development management where, quite rightly, Welsh Government hardly get involved at all with the determination of planning applications, and leave the decisions to be made by

<p>the LPAs.</p> <ul style="list-style-type: none"> • In relation to food safety, the current system of food business registration is not fit for purpose. Under existing arrangements, most businesses can start producing food without having to demonstrate that they can do so safely. We know, however, that the public's expectation is that the local authority carries out a check first. The current approach is also not in the best interest of businesses as invariably businesses that do not have contact with local authority officers prior to trading end up with a poor food hygiene rating on first inspection. We need an approach that can better support businesses that wish to start up, grow or diversify. We would therefore like to see the introduction of a "prior approval" or licensing system for food businesses.
<p>b) Are there other freedoms or flexibilities which local government should have? If so, what are they?</p>
<p>Please see above which was a response in respect of both powers and flexibilities.</p> <p>We note the analysis work undertaken by the WLGA on the plethora of corporate planning, governance and reporting duties in the Well-being of Future Generations (Wales) Act 2015, the Accounts and Audit (Wales) Regulations 2014, the Draft Local Government Bill 2015 and the current Local Government (Wales) Measure 2009. We would welcome an open and honest dialogue around the duplication of these arrangements with a view to developing a single set of robust planning and corporate governance arrangements to remove duplication and confusion.</p>
<p><u>Consultation Question 9</u></p>
<p>a) Which areas offer the greatest scope for shared transactional services?</p>
<p>We would wish to reiterate our response to 'Reforming Local Government Resilient and Renewed' that the following transactional services may benefit from being organised on a wider geographical footprint. At that time we proposed that, subject to an appropriate business case, 'Greater Gwent' would seem a sensible footprint and would wish to maintain that stance:</p> <ul style="list-style-type: none"> • Welsh language • IT provision • Legal Services • Payroll • HR transactional services • Procurement • Information Governance • Performance • Internal Audit • Administration of Housing Benefits and the Council Tax Reduction Scheme • Contact centre arrangements potentially with public sector partners • Order processing and Creditor Payments

<p>b) How might such arrangements be best developed?</p> <p>As we have stated we believe that local government has the maturity and expertise to determine which collaborative arrangements work best for its needs and those of the communities they serve.</p> <p>Appreciating that Welsh Government has funded the exploration of regionalised arrangements in the past, that perhaps have not always borne fruition, there may be a case to develop a route map for transactional services and provide appropriate resources to achieve service alignment. Regional Scrutiny Committee structures may be needed to support truly regional services.</p>
<p><u>Consultation Question 10</u></p>
<p>a) In ensuring we deliver a consistent approach across Wales, where consistency is important, how do you think the advice and support on each of these matters could be best provided?</p> <p>The Green Paper recognises the difficulties in combining authorities, unfortunately, however, it takes a ‘rose-tinted view’ of how these difficulties may be overcome with a suggestion that additional support from Welsh Government could help overcome these. We maintain that even with suggested support that it is highly unlikely to be enough to surmount the problems of combining services, staff, assets, systems and processes, finances and budget structures. The last time a reorganisation happened there were significantly more resources both in terms of capacity and finance to support the change. This is very much not the case now. We strongly feel that we do not wish our resources to be distracted from delivering high quality services for our residents onto a track that will take a huge amount of effort for what we see as negligible, or non-existent, potential gain.</p> <p>The suggestion of using capital receipts to support transformation costs highlights the optimistic thinking at play. How would this be applied consistently across Wales and across the borders of the proposed new authorities? Capital receipts are already earmarked to support services through austerity.</p> <p>The 2015 assessment of costs to local government was over £200 million. As far as we see it this could have only come from reductions in services that would impact on the public. CIPFA stated then that the costs had been underestimated and we maintain that return on investment is not possible as any available savings are likely to have already been taken in services. We are now facing service reductions on a large scale in order to balance our budget. Redundancy and compensatory payments would offset any savings that could be made in combining staffing, and as we have always strived to maintain front line services, as far as we possibly can, we cannot comprehend a future which would require us to reduce what we provide at the customer interface. You have highlighted that central support services would be necessary to drive the changes which have, as a consequence of decreasing budgets, suffered from reductions in capacity. This is particularly so for Caerphilly County Borough Council where we have sought to take savings in these areas if possible rather than disrupt front line services. To now expect those slimmer</p>

structures to support a reorganisation introduces risks that we are wholly opposed to. We want to use our corporate services capacity to drive transformation and improvement from within, not have that capacity diverted. We doubt that Welsh Government could provide the additional support needed to drive forward this agenda in a way that ensures continuation of service delivery and minimal impact to the public.

You rightly point out that the potential levers to bring improved services such as digital transformation, and a truly embedded use of the sustainable development principle in the Well-being of Future Generations Act, including working more closely with communities, offer options for transformation. These are tools that we are already engaged with and are exploring. Using WCCIS as an example of a transformative programme may not be a good example as we know that colleagues in health are far behind local authorities in embedding the system.

We maintain that we have the ability and expertise to decide how we can collaborate in shared services, to identify where the tangible benefits are, what the inputs may be and to balance the equation in any decision making. We expect that Welsh Government would take a less paternalistic view and agree with us on this point.

In terms of our estate we are already speaking to our PSB partners about the best use of our assets and so we do not feel that there are any unexplored options that will help us develop plans for the sustainable use of our combined assets. We are linking with the National Assets Working Group in this respect.

c) Are there any other challenges or opportunities from structural change or providing additional powers and flexibilities that have not been identified above? If these areas require support, what form should this support take?

We believe that we have answered this question above. Noting the intention of Welsh Government to provide additional support we do not think that, realistically, this can be provided to all 22 authorities at the same time, and to the same level, to enable the degree of consistency that would be required.

d) Which of the issues identified above or in your response should be prioritised for early resolution?

We have no comment to make on this point since we maintain that a reorganisation at this time would detract from what we are trying to achieve for our communities.

However, if this were to progress an agreed phased approach based upon voluntary agreed mergers would be preferable.

Consultation Question 11.

We would like to know your views on the effects that the proposals within this consultation would have on the Welsh language, specifically on opportunities for

people to use Welsh and on treating the Welsh language no less favourably than English.
a) What effects do you think there would be?
<p>The Welsh speaking population of Caerphilly County Borough Council is higher than that in Newport City Council. We have supported our Welsh learners via the Welsh in Education Strategic Plan 2017-2020; we have around 3000 pupils in Welsh medium primary education and have increased our secondary school provision with a capacity of around 2,348 by 2025 due to a second site being completed in 2013. This compares with between 600 and 700 primary pupils in Newport and a new secondary school.</p> <p>We have a robust 5-year Welsh Language Strategy for the area built upon our close working relationships with providers in the third sector. We run our translation service through a combination of internal and external provision. We have received relatively few complaints through the Welsh Language Commissioner.</p> <p>It is our position that the proposal to combine this authority with Newport City Council would have a detrimental effect on the Welsh language in view of the very different prevalence of usage, educational provision and service provision in Welsh.</p>
b) How could positive effects be increased, or negative effects be mitigated?
<p>We maintain, as we have set out above, that the amalgamation with Newport City Council is not the right 'fit' for us for all of the reasons explained. The Welsh language is just one such illustration of the difference between the two areas.</p>
<p><u>Consultation Question 12</u></p> <p>Please also explain how you believe the proposed policy within this consultation could be formulated or changed (if required) so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.</p>
<p>Please see above.</p>
<p><u>Consultation Question 13</u></p> <p>The Children's Rights Impact Assessment published alongside the consultation outlines the Welsh Government's view of the effect of the proposals contained in the consultation on children and young people. The Welsh Government seeks views on that assessment.</p>
a) Are there any positive or adverse effects not identified in the assessment?
<p>None identified.</p>

b) Could the proposals be reformulated so as to increase the positive effects or reduce any possible adverse effects?
None identified.
<p><u>Consultation Question 14</u></p> <p>The Equalities Impact Assessment published alongside the consultation outlines the Welsh Government's view of the effect of the proposals contained in the consultation on protected groups under the Equality Act 2010. The Welsh Government seeks views on that assessment.</p>
a) Are there any other positive or adverse effects not identified in the assessment?
<p>The Black and Minority Ethnic population of the Newport City Council area is significantly higher. 2.9% of homes in Newport do not have English or Welsh as a main language, compared to 0.5% in Caerphilly County Borough. The density of Black and Minority Ethnic groups is markedly higher in the Newport City Council area, with the council also being an asylum dispersal area.</p> <p>Given the differences in the two areas we envisage that the proposed merger footprint may be detrimental to Black and Minority Ethnic communities if the same level of service currently provided to them is diluted.</p>
b) Could the proposals be reformulated so as to increase the positive or reduce any possible adverse effects?
<p>The public sector demands are different across the two areas and it would be difficult to rationalise an equitable level of service across both that met the needs of Black and Minority Ethnic communities and also, for example, met the needs of deprived communities in the northern valleys.</p> <p>Deprivation is not a protected characteristic but it is recognised as being socially isolating, prejudicial and discriminatory.</p>
<p><u>Consultation Question 15</u></p> <p>Please provide any other comments you wish to make on the content of this consultation.</p>
<p>We fail to understand why, in the midst of austerity, we are being asked to respond to another Welsh Government reorganisation proposal. Since austerity began to affect local government finances we have responded to the challenge. We are still delivering services well, our customer satisfaction levels remain high with 74% of residents satisfied, or very satisfied, with the services provided by the council according to the most recent household survey. A robust plan has been developed that ensures the Council is able to deliver high quality, effective services over the next 5 years. However, we recognise that the resilience and sustainability of the smaller authorities is questioned and, if this is the challenge to be addressed, a more focussed and proportional response is needed and continued dialogue with local government is required in order to provide solutions that are appropriate and</p>

responsive to the needs of our citizens. Caerphilly is happy to continue discussions on this basis. We have to question why Welsh Government is leading us down yet another path; we maintain that the status quo is the best option for the communities of Caerphilly County Borough.



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Strengthening Local Government
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

11 June 2018

Dear Sir/Madam,

Consultation Response: Strengthening Local Government: Delivering for people

This response to the Welsh Government consultation on Strengthening Local Government is on behalf of the Catholic Education Service. The Catholic Education Service (CES) is the education agency of the Catholic Bishops' Conference of England and Wales ("Bishops' Conference"). The Bishops' Conference is the permanent assembly of all the Catholic Bishops in England and Wales and the CES, as the education agency of the Bishops' Conference, is charged with promoting and securing education on behalf of all the Bishops.

We decided that it was more appropriate to respond to this consultation in the form of a letter, rather than providing responses to the questions that were posed, since our points are more general in nature.

We understand the rationale for making the change, and support the Welsh Government's desire to ensure effectiveness and sustainability of public services for the future. The consultation document refers to the creation of new authorities providing an opportunity to reconfigure, redesign and transform service delivery across the range of local authority service areas. It also refers to bringing services together across local authorities and exploring new powers and freedoms. The intention to legislate to enable the proposals for the future shape of local government is noted.

Obviously, our interest lies in the way in which the changes will impact on the delivery of education services. Whilst the CES is generally supportive of the overall intention to increase regional working and create efficiencies for local government, we are concerned about the potential impact on the important local relationships between local authorities and their partners. The Catholic Church is a partner with local authorities in the provision of education. These are longstanding arrangements which have been in place for many years and are recognised in legislation. We do not want to see this partnership adversely affected in any new system.

There are already four regional consortia which are undertaking certain education functions on behalf of local authorities. It has taken some time for the diocesan relationship at individual authority level to be reflected with the consortia and concerns remain as to the extent to which the consortia are adequately engaging with dioceses. It is essential that any new arrangements ensure that appropriate partnership arrangements between local authorities and dioceses are built in, together with the

statutory provisions, including diocesan representation on education overview and scrutiny committees. It is essential that these rights for dioceses are retained.

We would request clarity about the decision-making process in any new configuration of local authorities, and that the existing relationships with partners are appropriately reflected in the new arrangements so that the rights and responsibilities of others, such as the Churches, are not undermined.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Christine Fischer".

Christine Fischer
Assistant Director and Head of Legal

Carmarthenshire County Council
Response to Strengthening Local Government: Delivering for People
June 2018

1. Introduction and Overview Comments

- 1.1 This response is provided on behalf of Carmarthenshire County Council. Although we welcome the opportunity to respond to this Green Paper Consultation Document we find it deeply frustrating to be in the position of having to respond to another Welsh Government consultation on the future of local government after the much welcomed assurance little more than 12-months ago by the then Cabinet Secretary for Finance and Local Government Mark Drakeford, that there would be no structural change for a decade.
- 1.2 At that point local government was fully engaged in and broadly supportive of the approach being taken forward by Mark Drakeford to further develop regional working through co-production between national and local government. We must therefore note our disappointment at another change in direction on Welsh Government thinking on the future of local government in what has felt like a constant re-churning of issues over the last 14-years since the publication of *Making the Connections* in 2004.
- 1.3 At a time when everybody working within local government are doing all they can to deliver efficient and effective services for our residents, with significantly reduced budgets, we cannot emphasise strongly enough how distracting this constant change in Welsh Government thinking has been for both councillors and officers. The uncertainty about future arrangements creates significant instability within services and holds back longer-term planning and re-shaping of provision to better respond to future demand. We must emphasise that this uncertainty does not prevent us from doing what we need to do to plan and deliver for our county's future but we would much prefer to do so in a more settled and supportive environment than we currently face.

2. The Case for Change and the Three Options

- 2.1 Having considered the case for change as outlined in the consultation document we do not believe that the three options presented by Welsh Government for strengthening local government will address the issues faced.
- 2.2 Whilst we recognise that there is a need to adapt the way local government is delivered we do not believe that wholesale change of the 22 local authorities is the way to do so. We also recognise that if we were starting with a fresh piece of paper we may not develop a model of 22 local authorities. However, we are not starting with a fresh piece of paper. We are where we are and we do not believe that wholesale change of the current model is the most innovative way of responding to this challenge. In fact it is a tremendous distraction.
- 2.3 When it comes to public services, fewer, larger organisations is not necessarily the answer, as has been proved by some health boards and other large public sector bodies in recent years. Due to the broad range of services and differing local demands faced by local

authorities, simply scaling-up the organisation to work to larger geographical boundaries will not resolve the service provision challenges facing those organisations. The change needs to happen in the way we provide the service not in the structure that supports the service.

- 2.4 We would agree that there are certain back-office type functions that could be delivered on a regional basis and we would be supportive of working with neighbouring authorities and other public sector bodies to consider areas where we could work together to deliver improved support for services. However, we do not believe that this approach requires organisational structural change and is something that could be managed through negotiated regional agreements on a case by case basis, where the collaboration benefits the service and organisation.
- 2.5 We would also ask that there is greater alignment of Welsh Government policy and directives for public services. A significant amount of local government back office time and capacity is taken up by having to decipher, respond to and align local arrangements to different and sometimes conflicting policy and practice requirements specified by Welsh Government.
- 2.6 As a Council we are fully supportive of the principle of regional working and have advocated this for a number of years across a number of different service areas where partners have been willing to collaborate. We would urge Welsh Government to focus its efforts on ensuring greater integration across Welsh public policy as a whole to enable and set higher expectations for greater collaboration. We do not believe that legislation and organisational reform is necessary to deliver progress on regional service collaboration. We fully support the WLGA's position in supporting the collaborative reforms outlined by the Welsh Government in 2017, a reform programme based on regional service collaboration with the retention of the 22 'front-doors' to public services.
- 2.7 Carmarthenshire has already been at the forefront of a number of significant regional collaborations such as ERW (Education through Regional Working) and more recently the Swansea Bay City Region. Both are examples of successful collaboration with clear governance and accountability arrangements being established without prescription through legislation. We firmly believe that this is the way forward for local government, where regional collaboration is taken forward when there is a clear business case to do so, where that collaboration adds value to what can be provided, be that through reducing the budget to provide services or increasing capacity within services. With Welsh Government support and backing to do so we are strongly of the opinion that this should be the way forward.
- 2.8 We fully support the statement made by the WLGA that there is a 'heroic assumption that reorganisation can be paid for solely by reducing senior management and councillor numbers'. This is very misleading and there needs to be a greater sense of realism about how much reorganisation would cost and what the actual benefits of going through the wholesale change would be. We have not seen any firm evidence that supports the need

for reorganisation on the scale outlined in the Green Paper and therefore cannot support any of the options outlined.

- 2.9 Having considered the outlined timescales for delivery of Option 3: a single comprehensive merger programme by 2022, which would see the election of Shadow Authorities in June 2021, we do not believe that this is deliverable within the timescales noted. In addition to this current Green Paper consultation there are a number of other significant on-going consultations looking at electoral reform which, if approved, could see a number of significant changes to current arrangements – possible extension of the vote to 16 year olds, an opportunity for local authorities to choose whether they use a different voting system to elect its members, a possible increase in the number of Assembly Members, review of Town and Community Councils. If all approved, we do not believe that delivering the required change within the timescales set is at all realistic as a number of those proposals would require wholesale review of existing boundaries at community council, county council and assembly level.

As outlined in the WLGA response we believe that there are a number of unanswered questions that need to be addressed before any further progress can be made on this agenda. These questions have been posed by local government, the WLGA or Assembly Committees in response to previous Welsh Government reform proposals with no detailed response to date:

- How much will local government reform cost and who pays the up-front costs?
- What will be the effect on council tax equalisation?
- Will there be a damping grant to pay for this?
- Will there be up-front financial settlements for authorities who consider merger to cover the period of the reorganisation transition which for example could be based on a no further cuts policy and positive settlement outcomes?
- How could this be reconciled for those council tax payers in authorities where mergers are neither required or desired?
- Will there be a commitment to fund a national redundancy scheme because of local government reform as there was with the NHS reorganisation in Wales and in councils in 1996?
- Will there be national redeployment policies based on the principles of workforce planning agreed by the Workforce Partnership Council (for example in the NHS such employees retain the designation as a Redeployment Candidate for a maximum period of 3 months, unless they secure a substantive post in the intervening period)
- In terms of job evaluation who will meet the additional costs of upward pay harmonisation?
- What will mergers mean for existing regional arrangements? If a council is large enough and capable of delivering all functions – could these be dismantled as a result of local democratic choice as part of the “strengthening local government” agenda?

- How many elected members will be required in merged areas? What will be the savings, what will it mean for democratic accountability across Wales and what is the feasible timetable for the Boundary Commission to undertake a review?
- What will be the public consultation on the boundaries of the new authorities, could this be partly determined by local referendums?
- Why do mergers on health boundaries remain sacrosanct?

In summary, for the last 4-years the local government view on future arrangements has been consistent. We do not feel that there is a need for structural organisational change and believe that, with full Welsh Government support and resources to do so, we can deliver the change that is required through regional collaboration between local authorities. The City Deals and Growth Deals approach is now starting to bear fruit and demonstrates what local and national governments can achieve when we work together, without any need for structural reform.

We would therefore ask Welsh Government to re-consider its latest proposals and listen to what local government have been saying consistently for the last 4-years. We do not need Welsh Government mandated collaboration. What we need is Welsh Government support and resources to help us deliver the change that is needed within our current arrangements.



Cllr. Emlyn Dole
Leader of Carmarthenshire County Council

Cyngor Sir Caerfyrddin

Ymateb o ran Cryfhau Llywodraeth Leol: Cyflawni dros ein Pobl

Mehefin 2018

1. Cyflwyniad a Sylwadau ar y Trosolwg

- 1.1 Caiff yr ymateb hwn ei ddarparu ar ran Cyngor Sir Caerfyrddin. Er ein bod yn croesawu'r cyfle i ymateb i'r Ddogfen Ymgynghorol Papur Gwyrdd mae'n rhwystredig iawn i ni ein bod yn y sefyllfa o orfod ymateb i ymgynghoriad arall gan Lywodraeth Cymru ar ddyfodol llywodraeth leol, a hynny ar ôl croesawu'r sicrwydd a gafwyd 12 mis yn ôl yn unig gan yr Ysgrifennydd Cabinet dros Gyllid a Llywodraeth Leol ar y pryd sef Mark Drakeford, na fyddai unrhyw newid strwythurol am ddegawd.
- 1.2 Ar yr adeg honno roedd llywodraeth leol yn cymryd rhan lawn ac at ei gilydd yn gefnogol i'r dull yr oedd Mark Drakeford yn symud ymlaen ag ef sef datblygu gweithio'n rhanbarthol ymhellach wrth i lywodraethau cenedlaethol a lleol gydweithio. Mae'n rhaid i ni felly nodi ein siom wrth weld newid cyfeiriad arall gan Lywodraeth Cymru o ran dyfodol llywodraeth leol ac mae'n rhoi ymdeimlad o ail gorddi materion yn barhaus dros yr 14 mlynedd diwethaf ers cyhoeddi *Creu Cysylltiadau* yn 2004.
- 1.3 Ar adeg pan fo pawb sy'n gweithio ym maes llywodraeth leol yn gwneud popeth yn eu gallu i ddarparu gwasanaethau effeithlon ac effeithiol ar gyfer ein trigolion, gyda chyllidebau sydd gryn dipyn yn llai, ni allwn bwysleisio ddigon sut y mae'r newid parhaus hwn o ran ffordd llywodraeth Cymru o feddwl yn gwrthdynnu sylw cynghorwyr a swyddogion. Mae'r ansicrwydd ynghylch trefniadau yn y dyfodol yn creu ansefydlogrwydd sylweddol o fewn gwasanaethau ac mae'n oedi ein cynlluniau hir dymor a'r broses o ad-drefnu ein darpariaeth i ymateb yn well i'r galw yn y dyfodol. Rhaid inni bwysleisio nad yw'r ansicrwydd hwn yn ein rhwystro rhag gwneud yr hyn y mae angen i ni ei wneud er mwyn cynllunio a darparu ar gyfer dyfodol ein sir, ond byddai'n well o lawer gennym wneud hynny mewn amgylchedd mwy sefydlog a chefnogol na'r hyn rydym yn ei wynebu ar hyn o bryd.

2. Yr Achos dros Newid a'r Tri Opsiwn

- 2.1 Ar ôl ystyried yr achos dros newid fel yr amlinellir yn y ddogfen ymgynghori rydym o'r farn nad yw'r tri opsiwn a gyflwynwyd gan Lywodraeth Cymru dros gryfhau Llywodraeth Leol yn mynd i'r afael â'r materion a wynebdir.
- 2.2 Rydym yn cydnabod bod angen addasu'r modd y mae llywodraeth leol yn cael ei ddarparu ond nid ydym yn credu mai newid y 22 awdurdod lleol yn eu cyfanrwydd yw'r modd i wneud hynny. Rydym hefyd yn cydnabod pe baem yn dechrau gyda llechen lân efallai na fyddem yn datblygu model o 22 o awdurdodau lleol. Fodd bynnag, nid ydym yn dechrau gyda llechen lân. Dyma'r sefyllfa yr ydym ynddi ac rydym o'r farn nad newid y model presennol yn llwyr yw'r modd mwyaf arloesol o ymateb i'r her hon. Yn wir mae'n tynnu sylw oddi ar ein gwaith yn aruthrol.

- 2.3 Pan fo gwasanaethau cyhoeddus dan sylw, nid sefydliadau mawr, llai mewn nifer o reidrwydd yw'r ateb, fel y gwelwyd gan rai byrddau iechyd a chyrff mawr eraill y sector cyhoeddus yn y blynyddoedd diwethaf. Oherwydd yr amrywiaeth eang o wasanaethau a gwahanol ofynion lleol y mae awdurdodau lleol yn eu hwynebu, ni fydd ehangu maint y sefydliadau i weithio o fewn ffiniau daearyddol mwy yn datrys yr heriau sy'n wynebu'r sefydliadau hynny o ran darparu gwasanaethau. Mae angen i'r newid ddigwydd yn y modd yr ydym yn darparu'r gwasanaeth nid yn y strwythur sy'n cynnal y gwasanaeth.
- 2.4 Byddem yn cytuno bod rhai swyddogaethau cefn swyddfa y gellid eu darparu ar sail ranbarthol a byddem yn gefnogol o weithio gydag awdurdodau cyfagos a chyrff eraill yn y sector cyhoeddus i ystyried meysydd lle y gallem weithio gyda'n gilydd i sicrhau gwell cymorth ar gyfer gwasanaethau. Fodd bynnag, nid oes angen newid strwythurol sefydliadol i gyflawni hyn, mae'n rhywbeth y gellid ei reoli drwy drafod cytundebau rhanbarthol ar sail achos wrth achos, pan fo'r cydweithio o fudd i'r gwasanaeth a'r sefydliad.
- 2.5 Rydym hefyd yn gofyn am fwy o gysoni o ran polisiâu Llywodraeth Cymru a'r cyfarwyddbau ar gyfer gwasanaethau cyhoeddus. Mae cryn dipyn o amser a gallu cefn swyddfa llywodraeth leol yn cael eu defnyddio wrth geisio deall, ymateb a chysoni trefniadau lleol i'r polisiâu ac arferion a bennir gan Lywodraeth Cymru sydd weithiau'n wahanol ac yn aml yn gwrthdaro.
- 2.6 Fel Cyngor, rydym yn gwbl gefnogol i'r egwyddor o weithio'n rhanbarthol, ac wedi dadlau o blaid hyn ers nifer o flynyddoedd ar draws nifer o feysydd gwasanaeth gwahanol lle mae partneriaid wedi bod yn barod i gydweithio. Rydym yn annog Llywodraeth Cymru i ganolbwyntio ei hymdrechion ar sicrhau mwy o integreiddio ar draws polisi cyhoeddus Cymru gyfan er mwyn galluogi a gosod disgwyliadau uwch ar gyfer mwy o gydweithio. Nid ydym yn credu bod deddfwriaeth a diwygiad sefydliadol yn angenrheidiol er mwyn sicrhau cynnydd o ran cydweithredu'n rhanbarthol ar wasanaethau. Rydym gwbl gefnogol i safbwynt Cymdeithas Llywodraeth Leol Cymru sy'n cefnogi'r diwygiadau cydweithredol a amlinellwyd gan Lywodraeth Cymru yn 2017, sef rhaglen ddiwygio ar sail cydweithredu'n rhanbarthol ar wasanaethau a chadw'r 22 'drws blaen' i wasanaethau cyhoeddus.
- 2.7 Mae Sir Gaerfyrddin eisoes wedi bod ar flaen y gad o ran nifer o fentrau cydweithredol rhanbarthol sylweddol megis ERW (Ein Rhanbarth ar Waith) ac yn fwy diweddar Dinas-ranbarth Bae Abertawe. Mae'r ddau yn enghreifftiau o gydweithredu llwyddiannus gyda threfniadau llywodraethu ac atebolrwydd clir yn cael eu sefydlu heb orfod dilyn deddfwriaeth. Rydym yn credu'n gryf mai dyma'r ffordd ymlaen ar gyfer llywodraeth leol, lle mae cydweithio rhanbarthol yn cael ei gyflwyno pan fydd achos busnes clir i wneud hynny, lle mae'r cydweithio hwnnw yn ychwanegu gwerth at yr hyn y gellir ei ddarparu, boed hynny drwy leihau'r gyllideb i ddarparu gwasanaethau neu gynyddu gallu o fewn gwasanaethau. Gyda chymorth Llywodraeth Cymru a'r gefnogaeth i wneud hynny rydym yn bendant o'r farn mai dyma'r ffordd ymlaen.
- 2.8 Rydym yn gwbl gefnogol i'r datganiad a wnaed gan Gymdeithas Llywodraeth Leol Cymru bod 'rhagdybiaeth arwrol y gellir talu am ad-drefnu drwy leihau uwch-reolwyr a nifer y cynghorwyr yn unig'. Mae hyn yn gamarweiniol iawn ac mae angen cael mwy o ymdeimlad

o realaeth o ran faint y byddai ad-drefnu yn ei gostio a beth fyddai'r manteision gwirioneddol o fynd drwy'r broses newid eang hon. Nid ydym wedi gweld unrhyw dystiolaeth gadarn sy'n cefnogi'r angen am ad-drefnu ar y raddfa yr amlinellir yn y Papur Gwyrdd ac felly ni allwn gefnogi unrhyw un o'r opsiynau a amlinellwyd.

2.9 Ar ôl ystyried yr amserlenni a nodir ar gyfer Opsiwn 3: rhaglen uno sengl gynhwysfawr erbyn 2022, a fyddai'n golygu ethol Awdurdodau Cysgodol ym mis Mehefin 2021, nid ydym yn credu ei bod yn bosibl cyflawni hyn o fewn yr amserlenni a nodwyd. Yn ychwanegol at ymgynghoriad y Papur Gwyrdd presennol, mae nifer o ymgynghoriadau sylweddol eraill ar y gweill sy'n canolbwyntio ar ddiwygio etholiadol a fydd, os cânt eu cymeradwyo, yn golygu nifer o newidiadau sylweddol i'r trefniadau presennol – posibilrwydd o ymestyn y bleidlais i 16 oed, cyfle i awdurdodau lleol ddewis a ydynt yn defnyddio system bleidleisio wahanol i ethol eu haelodau ai peidio, cynnydd posibl yn nifer yr Aelodau Cynulliad, adolygiad o Gynghorau Tref a Chymuned. Petai'r cyfan yn cael eu cymeradwyo, nid ydym o'r farn y byddai cyflawni'r newid gofynnol o fewn yr amserlenni o nodwyd yn gwbl realistig oherwydd byddai nifer o'r cynigion hynny yn golygu adolygiad eang o'r ffiniau presennol ar lefel cyngor cymuned, cyngor sir a'r cynulliad.

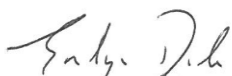
Fel yr amlinellwyd yn ymateb Cymdeithas Llywodraeth Leol Cymru credwn fod nifer o gwestiynau heb eu hateb y mae angen rhoi sylw iddynt cyn y gellir gwneud unrhyw gynnydd pellach ar yr agenda hwn. Mae'r cwestiynau hyn wedi cael eu gofyn gan lywodraeth leol, Cymdeithas Llywodraeth Leol Cymru neu Bwyllgorau'r Cynulliad mewn ymateb i'r cynigion diwygio blaenorol gan Lywodraeth Cymru heb unrhyw ymateb manwl hyd yma:

- Faint fydd cost diwygio llywodraeth leol a phwy fydd yn talu'r costau ymlaen llaw?
- Beth fydd yr effaith ar gydraddoli'r dreth gyngor?
- A fydd grant dampio i dalu am hyn?
- A fydd setliadau ariannol ymlaen llaw ar gyfer awdurdodau sy'n ystyried uno i dalu am y cyfnod pontio wrth ad-drefnu a allai er enghraifft fod yn seiliedig ar bolisi dim toriadau pellach a chanlyniadau setliad cadarnhaol?
- Sut y gellid cysoni hynny ar gyfer talwyr y dreth gyngor mewn awdurdodau lle nad yw'n ofynnol uno a lle nad oes awydd i wneud?
- A fydd ymrwymiad i ariannu cynllun diswyddo cenedlaethol o ganlyniad i ddiwygio llywodraeth leol fel y cafwyd gydag ad-drefnu'r GIG yng Nghymru ac mewn cynghorau ym 1996?
- A fydd polisiau adleoli cenedlaethol ar waith sy'n seiliedig ar egwyddorion cynllunio'r gweithlu y cytunwyd arnynt gan Gyngor Partneriaeth y Gweithlu (er enghraifft yn y GIG mae gweithwyr o'r fath yn cadw'r dynodiad Ymgeisydd Adleoli dros gyfnod o 3 mis, oni bai y byddant yn sicrhau swyddi parhaol yn y cyfamser)
- O ran gwerthuso swyddi pwy fydd yn talu'r costau ychwanegol o ran cysoni cyflogau?

- Beth fydd yr uno yn ei olygu ar gyfer y trefniadau rhanbarthol presennol? Os yw'r cyngor yn ddigon mawr ac yn gallu cyflawni'r holl swyddogaethau - a fyddai'r rhain yn dod i ben o ganlyniad i ddewis democrataidd lleol fel rhan o'r agenda "cryfhau llywodraeth leol"?
- Faint o aelodau etholedig fydd yn ofynnol yn yr ardaloedd sy'n uno? Beth fydd yr arbedion, beth fydd hyn yn ei olygu o ran atebolrwydd democrataidd ledled Cymru a beth yw'r amserlen ymarferol ar gyfer adolygiad y Comisiwn Ffiniau?
- Beth fydd yr ymgynghoriad cyhoeddus ar ffiniau'r awdurdodau newydd, a fyddai hyn yn cael ei bennu yn rhannol gan refferenda lleol?
- Pam fo trefniadau uno ynghylch ffiniau iechyd yn parhau yn rhai na ellir eu newid?

I gloi, am y 4 blynedd diwethaf mae barn llywodraeth leol ar drefniadau'r dyfodol wedi bod yn gyson. Nid ydym yn teimlo bod angen newid strwythurol sefydliadol ac yn credu gyda chymorth ac adnoddau llawn Llywodraeth Cymru i wneud hynny, gallwn gyflawni'r newid sydd ei angen drwy gydweithio rhanbarthol rhwng awdurdodau lleol. Mae dull y Bargeinion Dinesig a'r Bargeinion Twf bellach yn dechrau dwyn ffrwyth ac yn dangos yr hyn y gall llywodraethau lleol a chenedlaethol eu cyflawni pan fyddwn yn gweithio gyda'n gilydd, heb angen diwygio strwythurol.

Gofynnwn felly i Lywodraeth Cymru ail-ystyried ei chynigion diweddaraf a gwrando ar yr hyn y mae llywodraeth leol wedi bod ei ddweud yn gyson am y 4 blynedd diwethaf. Nid gorfodaeth i gydweithio sydd angen arnom gan Lywodraeth Cymru ond yn hytrach cefnogaeth ac adnoddau Llywodraeth Cymru i'n helpu i sicrhau'r newid sydd ei angen o fewn ein trefniadau presennol.



Cyng. Emylyn Dole
Arweinydd Cyngor Sir Caerfyrddin



Report of the Cabinet Member for Economy & Strategy (Leader)

Council – 21st June 2018

Response to Welsh Government consultation on the Green Paper regarding Local Government Reform: 'Strengthening Local Government – Delivering for People'

Purpose:	To respond to the consultation on the Welsh Government Green Paper regarding Local Government Reform: 'Strengthening Local Government – Delivering for People'
Policy Framework:	Green Paper - 'Strengthening Local Government – Delivering for People'
Consultation:	Access to Services, Finance, Legal.
Recommendation(s):	It is recommended that: 1) The response to the consultation on the Welsh Government Green Paper regarding Local Government Reform: 'Strengthening Local Government – Delivering for People' is noted and endorsed.
Report Author:	Richard Rowlands
Finance Officer:	Paul Roach
Legal Officer:	Debbie Smith
Access to Services Officer:	Sherill Hopkins

1. Introduction

- 1.1 The Williams Commission recommended larger and fewer Local Authorities. The Welsh Government accepted the recommendations and, in November 2015, published the Draft Local Government (Wales) Bill and Explanatory Memorandum (Nov 2015). The Bill proposed achieving structural reform through merging a number of Authorities, with eight or nine local authority areas as the preferred structure.

- 1.2 The White Paper, Reforming Local Government: Resilient and Renewed was published (Jan 2017) with proposals to take forward regional working by local Authorities in a mandatory systematic way.
- 1.3 Although Local government were broadly supportive of the case for change, there was no appetite for comprehensive mandated regional working and sought to negotiate voluntary 'regional deals' with the Welsh Government.
- 1.4 The main proposal in the current Green Paper 'Strengthening Local Government – Delivering for People' is to create fewer and larger Local Authorities, reducing the number from 22 to 10 Authorities. The indicative new authority areas would include the following groupings of Local Authorities:
- Ynys Mon (Anglesey) and Gwynedd
 - Conwy and Denbighshire
 - Flintshire and Wrexham
 - Ceredigion, Pembrokeshire and Carmarthenshire
 - Swansea and Neath Port Talbot
 - Bridgend, Rhondda Cynon Taf and Merthyr Tydfil
 - Vale of Glamorgan and Cardiff
 - Newport and Caerphilly
 - Powys
 - Torfaen, Blaenau Gwent and Monmouthshire
- 1.5 This report summarises the content of the Green paper consultation document (See Appendix A for the complete Welsh Government consultation document) and outlines the Council's response.

2. Summary of key points from the Green paper consultation document

- 2.1 Welsh Government has proposed three options for re-organisation:
- Option 1 – Voluntary mergers,
 - Option 2 – A phased approach with early adopters merging first followed by other Authorities, merging first by 2022 with all other Authorities merging by 2026,
 - Option 3 – A single comprehensive merger programme to be completed by 2022.
- 2.2 Welsh Government have outlined potential advantages and disadvantages for each option within the Green paper consultation. These are summarised as follows:

Option 1: Voluntary Mergers	
Advantage	Disadvantage
Enables the Local Authority to determine the pace of consolidation.	Creates uncertainty and the potential for divergence across Wales.

Option 2: A phased approach with early adopters merging first followed by other Authorities	
Advantage	Disadvantage
A flexible approach that would see a clear end point when the new structures would be in place.	Would create delays achieving any potential benefits.

Option 3: A single comprehensive merger programme	
Advantage	Disadvantage
Addresses the sustainability challenge quickest and removes uncertainty.	No choice for local government on the pace of change.

- 2.3 The other key points within the Green paper consultation document can be summarised as follows:
- 2.3.1 Welsh Government will produce a revised regulatory impact assessment with the revised costs and benefits of merging Local Authorities.
 - 2.3.2 The groupings will be aligned with Health Board boundaries (with the exception of Bridgend).
 - 2.3.3 The regional models of economic working and the City Deals will be expected to continue.
 - 2.3.4 Public Service Boards will be encouraged to move to working on a new regional footprint as soon as possible (before new Authorities come into being).
 - 2.3.5 Transition Committees would be established as soon as possible for each new Authority to prepare for the Shadow Authority. The date would be determined by the Option selected for re-organisation.
 - 2.3.6 Elections to Town and Community Councils will mirror those for principal Authorities in 2021 and 2025.
 - 2.3.7 Councils elected at the first new elections to the new Authorities would serve as 'Shadow Authorities' until vesting day. Existing Authorities subject to merger would be abolished on 31 March 2022 or 31 March 2026 (depending on the option pursued) and the Shadow Authorities would take over on the following day.

- 2.3.8 The consultation suggests holding any local government elections in June 2021.
- 2.3.9 The Boundary Commission would need to undertake electoral reviews and make recommendations by August 2020 for electoral wards, the number of councillors for each ward and the size of council for each of the new Authorities.
- 2.3.10 There would need to be the legal joining together of revenue and capital budgets and the amalgamation of local Council tax bases and assets.
- 2.3.11 Councillors should be properly remunerated, respected and recognised for the work they do in their communities.
- 2.3.12 Councillors should have the support and resources necessary to undertake their role including access to information and be kept abreast of decisions being taken on behalf of their council – and have support to fulfil their scrutiny role effectively.
- 2.3.13 The creation of new Authorities offers an opportunity to review the support for elected members to ensure that they can effectively undertake their roles as representatives of the electorate and responsible members of the local authority.
- 2.3.14 The Welsh Government will work with local government to champion the role of elected members and help communities understand, and value, the important part councils play in their lives.
- 2.3.15 Welsh Government intend to legislate for the general power of competence for principal Authorities that merge and community councils that meet eligibility criteria.
- 2.3.16 Creating new Authorities with additional powers and greater flexibilities would provide an opportunity to reconfigure and redesign services, share transactional and expert services and address workforce issues.
- 2.3.17 The new Authorities would present an opportunity to strengthen the Welsh language by pooling capacity and capability and would also need to have a focus on people with protected characteristics to ensure that they fully represent their communities.

3. Response to the consultation

3.1 Proposed Local Authority Areas: form should follow function

- 3.1.1 Swansea is open to the idea of merging but our neighbours may have different views. Swansea Council is committed to regional working and has dedicated resources and grasped the opportunity to work collaboratively; we are doing so increasingly despite the inconsistent messages from Welsh Government.

- 3.1.2 A voluntary merger approach is unlikely to deliver within an acceptable time period what the Welsh Government has set out.
- 3.1.3 The proposal around a phased approach to mergers leading up to 2026 will effectively kick the matter into the long grass. If there is a will to do this then it needs to be done rapidly i.e. by 2022.
- 3.1.4 The best model is the one that would deliver sustainable services over parochial interests. Local government in Wales will need the funding and flexibility to achieve this. The main driver for any changes to local government should be to retain focus on improving outcomes for citizens and should not be about saving money.
- 3.1.5 It will be very important to retain a focus on service delivery during any merger; for example, there is a danger that the proposed transition process will create such a disruption to service delivery. The previous re-organisation in 1996 created a lot of disruption with changes to electoral wards and staff uncertainty over jobs. To have this when councils are dealing with the unprecedented threat from austerity would be extremely challenging.
- 3.1.6 We must first have a clear vision for local government, other tiers of government and for all other areas of public service in Wales expressed in outcomes for the next 10 to 20 years and structures should follow this, i.e. form should follow function.
- 3.1.7 With a view towards achieving form over function, there needs to be a common set of values for local government, other tiers of government and all public services in Wales agreed by the public.
- 3.1.8 There is no guarantee that biggest is always best, i.e. that larger Authorities than those that already exist always deliver better performance or are a guarantee of financial health. There is a further risk that increasing the size of Council's will distance them further from the people that they serve.
- 3.1.9 There needs to be an understanding on what is best delivered regionally, e.g. specialist services, and what should be delivered locally, e.g. street scene services.
- 3.1.10 Starting from the health boundary footprints may not offer the best solution for effective service delivery or economic growth; economic development and regeneration will be the driver for economic and other well-being. The six councils in the mid and south-west have therefore all expressed the preference to collaborate on the economic development footprints, which should also include Health.
- 3.1.11 Health and social care are inextricably linked. Primary Care, Community Care and Social Care should be located in a single organisation with a

common accountability framework and a single budget. There should be democratic accountability built into this system.

- 3.1.12 The merger proposals will create confusion in relation to existing collaborations. If Authorities were to agree to merge, they may have very different views on arrangements that could freeze decision making on some collaborations until there is clarity.
- 3.1.13 The view of Swansea Council is that any review of boundaries should seek to encompass the natural boundaries of communities, which would identify with the Swansea Bay City Region. This model would follow the industrial heartlands of South West Wales and would include the neighbouring regions of Llanelli and the Swansea Valley together with Swansea and Neath Port Talbot.
- 3.1.14 Swansea, in common with the other Local Authorities in Wales, is currently reviewing its boundaries and has made its views known to the Boundary Commission for Wales, which can be shared with Welsh Government.
- 3.1.15 The City & County of Swansea believes that an independent review is needed on Welsh Government and local government relations in Wales so that relationships are constructive and a clear distinction established between the Welsh Government as policy maker and the public sector (not just local government) delivery arm.
- 3.1.16 Different Departments in Welsh Government appear to have different views on Local Government Reform, which is confusing. It will be important therefore to re-state as part of this what the different tiers of government will be doing in the new re-organised model. Any re-organisation should not only be about Local Government; it should be a more holistic review driven by a clear understand of what citizens want rather than what the Welsh Government wants. It needs to encompass all tiers of Government and all other public bodies in Wales and the roles and responsibilities of each will need to be clarified.

3.2 Reducing complexity

- 3.2.1 There should be a radical delayering of responsibilities and accountabilities in local government and public services in Wales to reflect Welsh Government as policy maker, local government as deliverer and a single inspectorate.
- 3.2.2 Local government is increasingly having to deal with a never-ending stream of new and complex legislative requirements and duties at a time of severe austerity. There needs to be a simplification and alignment of the many different legislative and policy frameworks affecting local government in Wales.

- 3.2.3 Too much interference and central direction from government and regulators on the content of Council's corporate plans and priorities, inhibits local discretion and innovation.
- 3.2.4 The language of accountability is negatively focussed on intervention and blame; instead it should be centred upon learning and improvement. A single accountability agreement should be in place describing outcome not process.
- 3.2.5 The current regulatory regime attempts to bring together judgements of the WAO, Estyn and CSSIW but they still each promote excellence in their respective fields irrespective of the impact in other areas. A single proportionate and risk-based inspection regime is needed based on a small number of agreed outcome measures with a focus on learning and improvement.
- 3.2.6 In addition to delayering and simplifying responsibilities and accountabilities and legislative frameworks, regional working could be made more effective by harmonising footprints, streamlining governance and decision-making arrangements and seeking to establish common approaches, language and systems; this in itself will be challenging.
- 3.2.7 Swansea is supportive of the proposed migration of Bridgend CBC into the Cwm Taf Health Board area because it simplifies the arrangements in Western Bay on a footprint that is unified and will offer significant opportunities to tackle some long-standing health and social care issues.
- 3.2.8 The role and function of Public Service Boards and their relationship to other collaborations should be reviewed in line with moves to delayer accountabilities and responsibilities within local government and the Welsh public sector, i.e. form to follow function.
- 3.2.9 The work of the PSBs and other regional partnerships, such as Western Bay, are not democratically accountable to the public; this must be rectified as a matter of urgency in order to provide PSBs and regional collaborations with democratic legitimacy.
- 3.2.10 In addition, PSBs should follow local government boundaries to further help demonstrate community leadership and local accountability.
- 3.2.11 The production of the Council's Corporate Plan and Medium Term Financial Plan and budget are all linked to the electoral cycle and provision will need to be made to ensure that they tie into any new electoral cycles going forward.

3.3 Funding the cost of re-organisation

- 3.3.1 There will be a large financial cost associated with local government re-organisation during a time of severe austerity. In 2014, CIPFA estimated that upfront costs of reorganisation across the whole of Wales could

range between £160m and £268m (based on Williams options). This was offset against projected annual savings in the order of £65m that will be achieved after a three-year period. These figures would need to be re-examined as a result of the passage of time.

- 3.3.2 Local Government could not and should not fund the cost of any local government re-organisation. Councils do not have the financial or other means to fund local government re-organisation.
- 3.3.3 There should be a radical review of the funding system to ensure the future sustainability of local government. The aim should be a single unhypothecated funding stream to local government in Wales backed by strong local outcome management.
- 3.3.4 The equalisation of Council Tax will create difficulties where there are significant disparities between different local Authorities. Council tax in Swansea is lower than in Neath & Port Talbot and it will be difficult for citizens to accept higher Council tax bands in Swansea should that be the outcome from any equalisation; the tax payer should not fund this sort of disparity.

3.4 Democratic accountability and trust in local government

- 3.4.1 Swansea believes that the levels of remuneration of Councillors should continue to be reviewed annually by the Independent Remuneration Panel and that an additional review is unnecessary.
- 3.4.2 Swansea believes that elected Members should not be bypassed and should have a stronger role in consultations and engagement with the public.
- 3.4.3 It is important to ensure that there is democratic accountability and more control for local government built into regional collaborations and that any mergers do not make local government and elected Members more distant from the people that they serve.
- 3.4.4 Swansea believes that a fundamental review of the existing structures and a radical delaying exercise being undertaken aimed at reducing complexity will help restore engagement and trust in the work of local government and public services and allow elected Members to focus on what is important to their constituents.
- 3.4.5 The language of accountability is negative focussed on intervention and blame and this has helped erode confidence in local government; instead, it should be centred upon learning and improvement. This would help restore public engagement and trust in the work of local government and public services.
- 3.4.6 Swansea supports a general power of competence for all Welsh Councils and believes that the Welsh Government should immediately seek to

devolve more powers, flexibility and autonomy to local government in Wales. However, this must be met with fair funding for local government where Welsh Government demonstrates that they recognise that Education and Social Care are as important as Health. This will enable local government to respond flexibly and to innovate in order to meet the priorities and needs of the people that they serve; this would also help to restore trust and engagement in local government.

3.5 Transformation and change

- 3.5.1 Demand management, prevention, service change and community capacity is needed to deliver the level of savings currently required to meet the challenge of austerity.
- 3.5.2 The role of the citizen and communities in dealing with demand management, changed service models and the creation of community capacity is vitally important. Personal responsibility for health, well-being, the environment and much else is key to managing and reducing demand.
- 3.5.3 We need a public sector committed to developing community capacity, managing and reducing demand, early intervention and customer focus; health, early intervention and prevention needs to be local government responsibilities.
- 3.5.4 Swansea believes in direct public service provision through local government where this will deliver the best outcomes for our residents. However, in order to address the significant financial challenges facing the Council, we are already through our *Sustainable Swansea – Fit for the Future* programme looking at new and innovative models of delivery for services, focussing on preventative services and demand management, digital opportunities and examining how communities can be enabled to help themselves.
- 3.5.5 Workforce planning and succession planning whilst essential are extremely difficult to deliver in a time of severe downsizing. The absence of standard pay and conditions leads to authorities competing for scarce resources, for example social workers. There is evidence that suggests as Local Authorities hit performance problems they simply outbid their neighbours for key personnel potentially transferring the problem and driving up salaries.

4. Equality and Engagement Implications

- 4.1 There are no direct equality implications to this report. However, local Authorities will need to continue to meet their statutory and legal obligations established under the Equality Act 2010, Public Sector Equality Duty (Wales) and Welsh language legislation and standards following any re-organisation. Our legal duties to consult and engage are also relevant here. The Council through its adoption of the UNCRC is

also committed to promoting and protecting the rights of Children and Young People and would be concerned to ensure that there would be no adverse effects on these from any proposals to re-organise local government in Wales.

5. Financial Implications

- 5.1 There are no immediate financial implications associated with this report at the present time. There is however longer-term issues and consequences set out within the Green Paper. The wider proposals as they develop could have significant financial and operational consequences and risks for the City and County of Swansea, and for local government in Wales across the piece. At this stage, it is too early to assess realistically with any certainty any additional specific costs, risks or opportunities for the City and County of Swansea.

6. Legal Implications

- 6.1 There are no legal implications associated with this report at the present time.

Background Papers: None.

Appendices:

- Appendix A** Welsh Government consultation on the Green Paper regarding Local Government Reform: 'Strengthening Local Government – Delivering for People'

Strengthening local government: delivering for people

Response to Welsh Government Green Paper

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1. Introduction and context

- 1.1 CfPS is the national expert on governance and scrutiny in local government. We have operated across England and Wales since being established in 2003, and delivered for the Welsh Government a Wales Scrutiny Support Programme for Welsh councils between 2012 and 2015. We have worked directly with Welsh councils before and after this programme to improve and develop the way they do scrutiny.
- 1.2 Our recent work includes guidance for Public Services Boards - a publication that promotes shared working among different authorities and helps scrutiny committees to provide accountability and improvement of Public Services Boards, along with training provided for individual authorities. We have also carried out a significant amount of work on modernisation and transformation in England and provided advice and support to scrutiny functions on how to tackle challenges associated with transformation and major change successfully. This includes the provision of advice and support to councils under central Government intervention and councils undergoing structural reorganisation (including the establishment and scrutiny of shadow authorities).
- 1.3 Given our field of expertise we would like to focus this consultation response primarily on the role of scrutiny. However, recognising that local government structural reform in Wales has been on the agenda for many years, and that previous attempts to facilitate more regional working through voluntary arrangements have proven to be less successful than expected, CfPS would like to stress the importance of consistent action now rather than allowing further delay and uncertainty.

1.4 In this consultation response we would like to address the scrutiny and governance elements of WG's plans for change. All our research¹ points to a fundamental role for scrutiny in the change process - scrutiny is meant to provide effective oversight of the transformation process. Such changes are often fast-moving, and as organisations reshape (and as new ones are created and old ones abolished) lines of accountability can become blurred. Oversight can drift away from elected members, for whom the complexity and pace of change is offputting. Invariably executive-side members and officers act in good faith – they want to see a wider range of elected members involved, and welcome productive scrutiny of their work – but without scrutiny being “designed in” when transformation happens, it can quickly get left behind.

2. Transition committees (and related arrangements)

2.1 The use of shadow authorities, and transition committees, to manage the change process is a longstanding feature of local government reorganisation. We are keen that WG recognises and clarifies the critical role of scrutiny in the operation of these bodies. We welcome the recognition that shadow authorities will have an important role in democratic assurance but consider that clearer commitments are necessary on what this means in practice.

2.2 Transition Committees and shadow authorities should act in a publicly visible way, to ensure that planning and delivery of matters relating to transformation (including, in particular, development of budgets) happens as far as possible in public. We see this as an opportunity for a step change in how local government carries out strategic planning and budget development in public – and an important way for the sector and WG to obtain local buy in to the changes taking place.

2.3 Transition Committees will need to be open – to allow for the scrutiny functions of the “predecessor” councils to review and consider their work, and to plan for a seamless move of local oversight between those predecessor authorities, to the shadow authority, to the new authority once it takes on its formal powers. The role of scrutiny at each stage is likely to be different, and to involve different partners. Transition arrangements will need to take in mind these necessary shifts in role and duty, to ensure that oversight does not falter at key points in the change process.

2.4 We expect that shadow authorities, once established, will have scrutiny committees; as far as possible these should both be responsible for

¹ In particular, “The change game” (CfPS, 2015), and our series of publications on English devolution, including “Devo How? Devo Why?” (CfPS, 2015) and “Cards on the table” (CfPS, 2016)

monitoring the progress of change, and helping the authority to set a strategic direction for the future. We consider that there is a risk that scrutiny could easily get bogged down in operational issues around the mechanics of the transition. If WG plans to issue, in due course, guidance on scrutiny in transition, this should reflect the need for scrutiny to provide a strategic overview, to mitigate this risk.

- 2.5 We expect that scrutiny would need to be free to decide on what its role ought to be at various stages in the process. Within the broad arenas of “strategic direction” and “oversight of transition” sit a wealth of potential opportunities for effective member oversight.
- 2.6 The local “space” for scrutiny is likely to look different from area to area. Strategic needs are different – the aspirations and experiences of the local population, and members’ political priorities, will be different too. Scrutiny’s role will need to reflect that nuance, which is why a careful line will need to be drawn between highlighting scrutiny’s centrality to transition and providing too much prescription about how scrutiny’s role ought to be transacted area by area.
- 2.7 These are issues that have been explored at length by Welsh councils and the WAO, most comprehensively as part of the “Good scrutiny? Good question!” national research and support carried out in 2014; we recommend that WG have regard to that valuable and comprehensive work in considering its next steps on governance.
- 2.8 Support to build and maintain capacity for effective scrutiny before, during and after transition will be especially important. We would like to see WG exploring with councils and WLGA what kinds of support and resource might be required to carry out these new and different roles. We cannot speak for the sector in setting out what we think that these roles, and their resource implications, are likely to be – practitioners themselves need to be the ones leading the debate, and WG should listen to them and act on their needs.

3. Roles and responsibilities of new councillors

- 3.1 The consultation document raised an important issue of roles and responsibilities of new councillors amid increasing pressures and various local government challenges. Scrutiny should be the first function to investigate this matter further, as it is uniquely placed to understand the realities of councillors’ work, to provide critical challenge and oversight of local government plans, and to engage with residents and communities.

- 3.2 In addition to that, there is an existing scrutiny duty and responsibility to reflect on scrutiny and the Executive's respective roles and functions, as well as to understand what enables local people to become involved in local democratic representation. With the help of public dialogue, scrutiny would be able to identify key gaps in the current councillor roles and attract Executive attention to them.
- 3.3 Solutions developed locally by scrutiny tend to benefit from councillors' knowledge and understanding of communities, their ability to build trust and connect with residents. As such CfPS would urge WG to recognise and act on scrutiny's leading role in resolving this issue at local level, rather than seeking to develop a national response to it. It is likely that local thinking and action, through scrutiny, can in due course be aggregated at national level for research and evaluation purposes.

4. Powers

- 4.1 CfPS welcomes the call for empowering elected members and Government's commitment to increase councillors' and councils' powers. Again, we would highlight the opportunity for elected members at a local level to lead this discussion. We would counsel against the automatic assumption that a national discussion is necessary about a consistent national approach to further devolution (subject to what we say in the paragraph below); it may be that different councils will want to proceed at different speeds, and a locally-led system will recognise this.
- 4.2 Additional powers will need to be accompanied by discussion about effective local accountability. While detailed discussions at local level will be the driving force, a discussion will need to happen between national institutions (WG, WAO, WLGA and others) to talk about what this means for expectations of national accountability. We would hope that agreement of robust accountability and governance systems at local level – driven by a cultural understanding of the benefits of good governance and a commitment to openness in general – will provide national bodies with the assurance they need to adopt lighter touch approaches to oversight. This will make meaningful devolution role – driving down accountability for local decision-making down to local level, where it sits best. We would naturally conceive of scrutiny as central to these local arrangements.
- 4.3 In advance of formal proposals on the type of powers needed, CfPS would propose that local authorities should stress-test local proposals for additional powers before making a submission to the Government – as the first step on this journey towards better local assurance. We believe that solutions developed locally based on extensive local knowledge and ability to connect to

residents would benefit local authorities as well as help in building relationships between councillors and communities.

5. Support for change

- 5.1 CfPS welcomes WG's commitment to provide early practical support to councils on the issues of workforce development, service integration, and digital developments. However, given that transformation is such a complex process and has numerous challenges not only on the delivery side, we would note the importance of support to politicians – to enable them to manage the transition and the new skills required effectively. Organisational development is as much to do with political culture – councillors leading from the top – as it is about anything else.
- 5.2 We recognise the workforce benefits of conceiving of a “single public service” for Wales, and of the associated “once for Wales” approach to planning, designing and delivering services.
- 5.3 We would however counsel against approaches that degrade local accountability and local democracy, however. It is correct that the “right” decisions have to be taken at the “right” level – but those decisions have to be implemented by officers who are accountable to, and embedded within, the communities they serve. We are concerned that an approach which focuses on business efficiency, and the removal of perceived “duplication” in local public services, will result in public services becoming more remote and less tailored to the needs of individual people and communities.
- 5.4 We welcome the commitment of ongoing support to the sector by Academi Wales. We would expect that the offer to local government delivered, in part, through that organisation will be developed alongside the sector, and that it will take into account the bespoke needs of different councils, different approaches to scrutiny and accountability, and the needs and expectations of different political groups.
- 5.5 Political support is vital for two main reasons:
- (1) it would help councillors deal with the increased work load, and
 - (2) it would allow councillors to engage with local communities more effectively.
- 5.6 Political support is about ensuring that residents and local people fully understand the transformation process, its impact on their lives, and their role and contribution to the transformation – and that councillors are visible in

publicly owning, and overseeing, those changes. Such political support may include providing additional resources and support to councillors on ways to engage with communities, on ways of managing change, and of strengthening local scrutiny in advance of transformation and may include increasing officer resources to support scrutiny and training opportunities. We have highlighted some of the specific opportunities on this front earlier in this paper.

6. Transformation

6.1 CfPS extensive research on transformation issues highlights the need for any service reconfigurations and transformation to be planned and delivered in a way that maximises opportunity for effective and proportionate member scrutiny.

6.2 According to our research, strong scrutiny support during transformation time enables councils to:

- Connect with local communities and explain risks, impact, and rationale for the transformation to residents
- Provide an assessment of the impact of change taking place and assemble a risk register
- In preparation for the change, to analyse key relationships and engage with stakeholders on ways to manage those relationships after the change has taken place
- Focus on value, quality, and performance
- Provide accountability and transparency of the process, which ultimately leads to further legitimacy of transformation plans.

6.3 Knowing this, we hope to see a strong and supported scrutiny function that would assist local authorities in transformation.

Centre for Public Scrutiny
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