

# 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?

Don't impose a 'one size fits all' solution - centralised provision of healthcare eg taking services out of Pembrokeshire has been to the detriment of those who live there.

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?

Very much against. Bigger doesn't mean more efficient, it just means more bureaucracy.

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

Leave the existing authorities in place but agree common standards and share best practice.

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?

*No Response*

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

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?

*No Response*

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** S Dean

**Organisation (if applicable)** -

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

*No Response*

Q36. Telephone

*No Response*

Q37. Address

Burton  
Pembrokeshire

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

*No Response*

## **Delivering for People Strengthening Local Government.**

### **Response from Socialist Health Association Cymru Wales to Welsh Government Green Paper Consultation Document**

SHA Cymru Wales is supportive of the Welsh Government's (WG) proposals to strengthen local government:-

- Devolving more powers and responsibilities to local authorities.  
We welcome the consultation document's request to local government leaders for their views on what powers and responsibilities would make a meaningful difference. However it would also be of interest to read the WG's own views on this matter.
- Promoting mergers between existing local authorities
- Creating a footprint for local authorities which is co-terminus with other major public service bodies such as health boards
- Driving greater regional co-operation
- Enhancing the role of local elected representatives in the scrutiny and governance of all local public services.

Just as the National Assembly is the key democratic body in holding the Executive to account at a national level in Wales, SHA Cymru Wales believes that local government and its elected members should have a similar role for all locally delivered public services.

We are therefore particularly disappointed that there is no acknowledgement of the potential role for local government and locally elected members in helping to bridge the accountability and democratic deficit in local health boards and the range of cross boundary organisations such as public service boards, local service boards, city regions and bodies that co-ordinate educational and social care provision.

- Recognising the key role of local elected representatives to be the voices and champions of their communities.

We do not agree with the very minimalist, “safety net” view expressed in the consultation document (Para 6.45) on the role for public services in Wales. It suggests a very limited role for our public services which is only triggered by the failure of citizens to live independent lives. Our public services have a central, proactive and on-going role in enabling a more sustainable, prosperous, healthier and equal society.

While we accept that an optimally functioning public service in Wales will be in a better position to resist the consequences of continuing austerity, SHA Cymru Wales strongly believes that continuing austerity totally erodes the capacity of public services to improve the well-being and quality of life of our citizens. The Welsh Government must continue to lead resistance to austerity and should not provide false solace that better public services be able to compensate for the failing, ideologically driven policies of the UK Government.

### 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?**

*SHA Cymru Wales welcomes the establishment of public service and local service boards on a statutory footing. We believe that the WG should legislate to place a duty on PSB and LSB to deliver key outcomes, in line with national Welsh standards, for their target populations. This should be underpinned by the creation of integrated delivery organisations, joint planning and pooled budgets.*

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

*There is a lot of common sense in what is being proposed. However SHA Cymru Wales shares the WG's frustrations at the slowness of progress towards more joint working across the Welsh public service. This long pre-dates the Williams' Review.*

*There is no doubt that some progress has been made but the pace of change is much too slow.*

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

*We support creating fewer, larger local authorities as it will allow for the greater concentration of leadership and managerial capacity in Wales. We do not believe that there is a sufficient cadre of public service leaders and managers to meet the needs of 22 local authorities.*

*This concentration of quality leadership and managerial skills is necessary to deliver the calibre of public services the citizens of Wales need.*

**d) Are there other options for creating fewer, larger authorities we should consider?**

*Size, of itself, is not a guarantee of success. There is a real danger that the WG is over-fixated on size.*

*The biggest local authorities in Wales have had major service failures while some of the smaller authorities have shown an excellent capacity to innovate and modernise.*

*While size has the potential to produce economies of scale and sustainability across many parameters, size can produce dis-economies. Big,unwieldy and complex organisations can also be dysfunctional, opaque, unaccountable and ungovernable.*

### 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**

Yes.

*SHA Cymru Wales strongly believes that in providing this clarity there must be a clear commitment to co-terminosity with other major public service bodies, most particularly the NHS.*

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

*Yes. We largely agree with the identified factors.*

*However SHA Cymru Wales believes the consultation seems to have an over-emphasis on size and does not pay enough attention to the other benefits ( though a number are mentioned in passing).*

**c) What are your views on the new areas suggested in this section?**

*It is vital that there is co-terminosity and alignment with health boards.*

*SHA Cymru Wales accepts that any sized public body will produce its own particular set of strengths and weaknesses.*

*We are not convinced that bigger health boards would produce better health care outcomes though the need for regional planning beyond health board boundaries is essential.*

**d) Do you have alternative suggestions and, if so, what is the evidence to support these as an alternative? / 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?**

*SHA Cymru Wales believes that there is a major democratic deficit in local health service bodies.*

*The present model of health boards is not working well with most board members not representative or typical of the communities they service. Consequently while they do bring certain technical and professional skills to Health Boards they are in a poor position to exercise the type of scrutiny that a major public service needs.*

*We believe that locally elected public representatives should be in a position to scrutinise and hold all public bodies that operate in their area to account.*

*We recognise that elected representatives have failed to hold existing local authorities to account for many service failures. Too often scrutiny is superficial, formulaic and not searching. Consequently any review of the performance of local government must look at the role, capacity and opportunities for elected members to hold their executives to account.*

*Any review of the role of elected representatives must recognise the importance of local personal links to be strong a local voice and champion for their community. It is therefore crucial that there should be enough councillors to undertake both their local representative roles as well as their more corporate roles in wider organisational governance.*



### **Consultation Question 3**

**Chapter 5 sets out the proposed approach to transition and implications for establishing Transition Committees and elections to Shadow Authorities under each option.**

*SHA Cymru Wales believed that more WG direction is needed to reform local government in Wales. Local government's slow rate of progress to date shows that a voluntary approach is not working due to too many local vested interests.*

*A voluntary merger process, with clear time-tables and deadlines, would be ideal but the record to date shows there is little prospect that this will work.*

### **Consultation Question 5**

**The Welsh Government recognises that there are some plans or assessments, for example the preparation of assessments of well-being 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?**

*It is correct that PSBs and LSBs should reflect the political priorities as expressed at the ballot box. SHA Cymru Wales would therefore broadly support the approach of linking the preparations of the the relevant assessments and plans with the electoral cycle – accepting that in some instances the electoral cycle is not always the optimal time frame to delivery significant reform and change.*

### **Consultation Question 6**

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

*SHA Cymru Wales would not support any move to “democracy on the cheap” a.k.a “cutting the cost of politics”.*

*Unless we move to full-time elected representatives then most councillors will have other demands on their time including family responsibilities and work. And if we are to attract the best possible candidates to represent local communities they must not be overwhelmed by their duties.*

*Local representative democracy will therefore need sufficient councillors to undertake their existing workload as well as any new responsibilities that might come their way.*

### **Consultation Question 7**

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

*SHA Cymru Wales believes that locally elected representatives should have a more extended role to inform the delivery of all public services in their community including health matters.*

*We regret that the guidance on NHS planning makes a clear distinction between NHS and local government planning when there is major need for a joint planning processes.*

*We welcome the WG's emphasis on the role of primary clinical networks in the delivery of health care in Wales. We believe local councillors (both county and community) could play an important role in informing local network strategies and policies.*

**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?**

*While SHA Cymru Wales recognises that progress is being made in local government scrutiny, overall we believe that the relationship between the executive and backbench elected members remains too cosy.*

*Political parties and elected representatives do not always fully appreciate the key role of scrutiny in holding public service deliverers to account. In addition most members of the public place a priority on their councillors being local champions and community leaders and place little value on their corporate scrutiny role. And it is this local role that most electors will use to judge the performance of their elected representative.*

*More work must be done for make the public more aware of these dual duties of councillors. As well the scrutiny process in local government must be better resourced and supported with backbench councillors being provided with more training.*

### **Consultation Question 8**

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

*SHA Cymru Wales believes that local government needs to be more closely integrated into the work of other public bodies such as the NHS, housing, economic development and transport agencies. This is most obviously important in areas such as social services, housing and promoting public health.*

*For the last few decades there has been a move away from local authorities being direct providers of services. This has been promoted in the interests of value for money and efficiency. As a consequence much of local service provision is now out-sourced e.g. transport, housing, social care and leisure services. While some savings may have been made they have been achieved at the expense of the employment conditions of staff and the loss of public accountability in service provision. SHA Cymru Wales believes it is time to revisit and review these models of delivery.*

*While the WG have introduced innovative and welcome legislation such the Future Generations Act, in reality the impact has been mainly aspirational mainly due to the continuing effects of austerity. Local authorities are concentrating increasingly on core “statutory” services. However the quality of life and the promotion of public health and well-being of many of our most disadvantaged communities is heavily dependent on the provision on “non-statutory” services. Unless this is acknowledged and addressed the inequalities in our already badly divided society will only increase further.*

### **Consultation Question 9**

**a) Which areas offer the greatest scope for shared transactional services? / b) How might such arrangements be best developed?**

*SHA Cymru Wales believes we need to be doing more to create a single Welsh public services. While there needs to be “specialisms” within this public service in the health service, planning, education, housing etc. there also need to be a greater sense of a unified public purpose.*

*Many back room and procurement functions should operate wider than the silos of existing local government, the NHS or other public bodies. Career development and progression should also be much easier across all sectors. While Academi Wales is doing some welcome work to promote the learning and development of leaders and managers working across the Welsh public service there is no doubt that the predominant culture remains one of silo working.*

#### **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.**

#### **Consultation Question 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.**

*SHA Cymru Wales strongly believes in the national mission to promote a bilingual country where people can live their lives equally through Welsh and English. In reconfiguring the local government footprint it is therefore important not to create “Welsh” and “English” local authorities.*

*In many part of Wales, where English is the predominant language, there is a serious lack of capacity in our public and third sectors to allow this to happen. Smaller organisations are more vulnerable in this regard. Bigger Welsh local authorities and other public service bodies need to consider how they can develop their capacity to support others outside their immediate areas of responsibility to deliver a bilingual Wales.*

#### **Consultation Question 13**

**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.**

*SHA Cymru Wales is very concerned about the growing levels of child poverty and social inequalities in Wales. We acknowledge the evidence from many sources that indicate that this is a consequence of the “anti-family”, “anti-children” and “anti-women” austerity policies of the UK government rather than due to the actions of the WG.*

*This will have an immediate and long-term impact on the affected individuals, communities and Wales. The years “lost” in a person’s early life are not readily recoverable.*

*In bigger organisations it is much easier for the marginalised, disempowered people and communities to be ignored. To date the WG has failed to develop an effective mechanism for any of our public bodies to demonstrate what they are doing to address the wider issue of growing inequalities. The policy objectives of tackling inequality are clearly stated but delivery strategies and policies are not always clear, prioritised or monitored in an open way.*

*Apart from income poverty there are also other factors contributing to the growing*

*divisions in our country. Many local government and health services, while being community based, are being concentrated in fewer and fewer locations. This creates a problem of access for those on low income or who live in geographically peripheral areas.*

*In many of our communities services in the public and private sector are being lost. Local shops, schools, cafes, post offices, doctors' surgeries, libraries, leisure & community centres and public transport are disappearing. All of these services are essentials for a resilient community where children can grow and thrive*

*Public services are the major means for the redistribution of opportunity to our most disadvantaged communities and individuals. But as these services retrench and consolidate on core statutory responsibilities much of the provision that contributed to the quality of life our most disadvantaged communities is being lost.*

*The Communities First programme recognised and sought to address multiple deprivation, albeit with variable and limited success. Its replacement has a much narrower focus and there is no evidence that any of our public bodies are seeking to fill the gap that has been created by the loss of Communities First.*

#### **Consultation Question 14**

**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.**

*While in bigger organisations there may be the capacity to address the requirements of the Equality Act again there is a risk that the marginalised and disempowered will not have their voices heard. And in a period of austerity this risk is all the greater.*

*The UK government's constant rhetoric and practice of tacking those dependent on the welfare state and public services makes it very difficult for Welsh public bodies to give effect to welcome intentions of the Inequality Act.*

*However the WG must give a strong lead to any reconfigured Welsh public service to recognise the right of all citizens to live full and enriching lives.*

12 June 2018

By email

Dear Cabinet Secretary

**Response from SOLACE Wales on the Green Paper – Strengthening Local Government**

SOLACE Wales is the professional body representing Chief Executives and Senior Managers in Public Services within Wales. SOLACE Wales is part of the UK wide SOLACE.

SOLACE Wales endorses the response to the green paper that has been submitted by the Welsh Local Government Association. As such our response avoids repeating the same comments in detail. Our starting position is to welcome any serious and constructive debate that might lead to a clear and ambitious vision for Local government and we have set out here what we consider to be some of the features of such a vision.

At the outset, we do not consider any debate over the number or size of local authorities to be productive or helpful in the absence of a clear vision for public services or as a substitute to such a debate. To be clear we do not regard conversations about the position of boundary lines on maps to amount in any way to a meaningful discourse over the purpose and impact of public services. The WLGA response makes these points in more detail but suffice it to say that we do not think there is a strong case that changing the number or size of councils will lead to any clearer articulation of a vision for sustainable and effective public services and that any such change (particularly in the absence of a clear vision or purpose) will just lead to an extended period of disruption and increased cost. Such disruption and increased cost would be to the detriment of the communities that we seek to serve.

Turning instead to the larger question about articulating and agreeing a vision for local government we would make the following observations:

Any vision of local services and local government needs to be rooted in an assessment of the current and likely future needs of our communities rather than historic or “traditional” assumptions.

The reality is that our communities are living through a period of increased uncertainty, rapidity and turbulence of change. Whilst this makes predictions of the future extremely complex, it is clear that Wales and its communities will not be immune to global forces of change. Global forces that manifest as dramatic changes in our economy, technological capability and influence, demography and environment.

If unprepared to navigate such uncertainty and change, our communities remain vulnerable. A sustainable and prosperous future for Wales depends on creating greater resilience and confidence in dealing with such changes--for individuals, families, and our local communities--so that they are flexible in their thinking and have the skills to be adaptable in their approach to Life's unpredictable challenges.

A key role of local public services therefore, is to work closely with our local communities in co-designing and co-producing lifestyles which foster, promote, and grow this resilience, particularly for those who do not have the assets (financial, social or personal) to do this for themselves.

Democratically accountable and suitably empowered local authorities have unique credibility and legitimacy in convening and directing a whole systems approach that brings the necessary leadership to harness and direct our local assets to the greater good and to more equitable prosperity which leaves no one behind.

The relationship between councils and Welsh Government is key to this, as is the consequently clearer new complementary role of the Assembly in establishing and maintaining a framework and set of processes which directly incentivises such local leadership networks and collaboration across the public, business and third sectors. We all recognise the need to work collaboratively with a host of partner organisations and groups at various scales, where it makes sense to do so and where it is in the interests of those that we serve. There has been considerable momentum built over recent years and many new forms of service delivery, whether this be at the local level, with community groups and partners in delivering truly local services or in the form of more regional and strategic collaborative approaches, as is the case with City and Growth deals. This progress, which helps build capacity and resilience alongside the vital direct services provided by the current unitary authorities needs to be acknowledged and at the same time the significant potential disruption to such progress and momentum caused by a poorly evidenced Green Paper also needs acknowledging.

Likewise, there needs to be an acceptance that if new additional powers and flexibilities are both desirable and necessary, then those additional powers and flexibilities should follow. There should not be a caveat that costly and disruptive mergers are a pre-cursor to the granting of such additional powers, as presented in the Green Paper. This will allow local authorities that are already working in innovative and transformative ways to continue to do so and can build capacity and resilience. It is for this reason that the debate needs to develop alongside and not separate to a wider debate on sustainable funding of local services into the future.

Unless it is judged that current structures actively inhibit the new approach (and we contend that there is no evidence that this is the case) the focus should be on the role and function of local government in the context of a changing world and not on the form of local

government, which seems to have been a preoccupation for far too long. As the key professional body for senior local government staff, and as the primary advisers to local political leaders, Solace Wales will engage fully in any debate and discussion which reflect the principles set out above. We would be active partners in a bolder and more relevant response to the real questions of what are public services for in Wales in future, how will they be led, how will they be resourced, and how will they work differently? We look forward to an active opportunity to demonstrate this as respected partners in the wider change process in Wales."

Yours sincerely

A handwritten signature in blue ink, appearing to read "DM", followed by a long horizontal line.

Darren Mephram

Chair Solace Wales

Strengthening Local Government

Welsh Government

Cathays Park Cardiff

CF10 3NQ

**Representation from the Swansea Bay Port Health Authority**

At a meeting of the Swansea Bay Port Health Authority on 20/04/2018, members resolved that I should write to you to set out some initial matters on the Green Paper - Strengthening Local Government: Delivering for People - as far as the Authority is concerned. The Authority may also separately formally respond via the template in due course.

The views expressed were the unanimous view of the Swansea Bay Port Health Authority members present who are drawn from 4 Riparian local authorities: Bridgend County Borough Council, Neath Port Talbot County Borough Council, City and County of Swansea and Vale of Glamorgan County Borough Council. Those authorities will of course be responding in their own capacities on wider matters too.

It is disappointing, once again, especially given the efforts of the previous Director to draw your attention on past attempts at reorganisation, to fail to recognise that the Port Health Authority actually exists and has done for a substantial period of history (since 1887). It may be a relatively small function but nonetheless delivers vital protection and support. It also represents the very best of long established formally constituted regional working across 4 different local authorities

The boundaries as proposed drawn do not either reflect the existence of the current Port Health Authority nor lead the members to conclude that the arrangements have thought about who, how and where the function will sit in future. The proposals for Vale of Glamorgan to merge with Cardiff, which does have its own Port Health function, could be potentially accommodated if there is legislation to modify the Port Health Authority boundaries. The proposal for Bridgend is merge with Rhondda Cynon Taf and Merthyr both of which of course by geographical location do not have a Port Health Function. An enlarged authority could continue to be represented on the Port Health Authority but the coastal strip already small in Bridgend terms would be markedly smaller still in an enlarged authority.

Will the Swansea Bay Port Heath Authority continue to exist or not and, if not, who picks up the important functions? These need resolving well before merger. It would also be a huge shame to unpick entirely successful regional working.

Members noted with concern that there will be clear costs of harmonisation and integration on reorganisation and yet again no money to pay for it upfront. As a relatively small body it has no means to meet these potential costs. Members will be exploring this matter further bringing to bear their experiences of wider issues between authorities, other public bodies and the growing regional working agenda.

Yours sincerely

Ben Smith - Clerk and Treasurer

Councillor Gary Thomas - Chairman

Swansea Bay Port Health Authority



## Annex C: Consultation Questions

Your Name	Paul Clasby- Chair
Organisation (if applicable)	Tai Ceredigion Monitoring Group,
E-mail / Telephone	chairtcmg@gmail.com
Your Address	c/o Tai Ceredigion, Unit 4 Pont Steffan Business Park, Lampeter, Ceredigion SA48 7HH

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

<b>Chapter 3</b>
<b><u>Consultation Question 1</u></b>
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?
See (c)
b) What are your views on the common elements to the process of mergers we outline in this section?
None.
c) What are your views on the options for creating fewer, larger authorities which we have set out?
There would appear to be strong economic drivers to support the creation of larger authorities. The total population of Wales requires economic development that produces a trajectory of rising per capita income. However this has to be effectively based on the baseline of resource utilisation in all forms. A general consolidation into larger administrative units has the potential to produce “economies of scale” in terms of procurement, development of specialist departments, together with the training and skill enhancement of the workforce.
d) Are there other options for creating fewer, larger authorities we should consider?
Amalgamating geographical areas into larger administrative units is we suggest a matter that requires an exercise in the precautionary principle. It is we suggest

<p>necessary to take account of the development needs of the local population, to optimise the use of natural resources (physical and aesthetic). It is recognised that the social infrastructure is very important in terms of homes provided and the schools, hospitals and public services to them. However any future reorganisation of local government surely must consider the necessity of appropriate development to support this. While fewer larger authorities have the potential for sharing resources across more of the population there are some downsides too. These essentially concern the loss of localism and democratic accountability.</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>Economic costs have to be carefully evaluated in terms of short term efficiencies versus sustainability and the issues around competitive advantage in the so-called global market place. It may be appropriate to widen existing benchmarking schemes to ensure increased skill levels and standards across all public sector services with the expectation of such a culture transferring to the private sector too. There are considerations which require greater co-terminosity between “travel to work areas”, hospital catchment areas, lifelong training and career development opportunities.</p>

<p><b>Chapter 4</b></p>
<p><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.</p>
<p>a) Do you agree that providing clarity on the future footprint of local government is important?</p>
<p>Yes, this is essential. However it should have regards to population demographics and density together with income generation potential.</p>
<p>b) Do you agree with the factors we have identified to inform our thinking? Would you change or add any?</p>

c) What are your views on the new areas suggested in this section?
There may be a risk in recreating such geographical areas as a “New Dyfed” without recognising that the rural Mid Wales ( Powys, Ceredigion, North Carmarthenshire) area has very different circumstances from those prevailing in much of Pembrokeshire.
d) Do you have alternative suggestions and, if so, what is the evidence to support these as an alternative?
Alternative local authority boundaries may be an opportunity to create appropriate structures that proactively support certain types of development in an area. This would enable better utilisation of brand based natural resource commodities.
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?
It is suspected that as a generalisation Wales is becoming a more unequal society with the elderly demographic, and south M4 corridor developments. Any new structures we would suggest should be of scale and stature to deliver for all the population. A Development Commission may even be necessary to prioritise (and fund) identified opportunities and necessary infrastructure which local authorities cannot provide on their own. Rural areas can no longer just rely on agriculture and tourism. Despite strenuous efforts over the last 40 years there are sections of the community that have not enjoyed rising living standards, income poverty is an indicator of this although adult skill levels, literacy and numeracy. Partnership development agencies are needed.

## Chapter 5

### Consultation Question 3

Chapter 5 sets out the proposed approach to transition and implications for establishing Transition Committees and elections to Shadow Authorities under each option.

- 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>Transition Committees need to carefully consider the “stake holding” model to ensure a fair reflection of the community receiving benefits and services.</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>Clear guidance and expectation from Welsh Government is preferred. There are many considerations and while “one size does not fit all” a voluntary approach is to be favoured within an overall context and set objectives for change.</p>
<p>c) Do you have any other thoughts on the proposed process?</p>
<p>While there are drivers for change it may be useful to think of it in terms of “developmental change”. Pioneers and Early Adopters could lead the Reforms potentially producing working arrangements with other public and Third sector social organisations. In terms of form and function the reorganisation surely has to ensure it is fit for purpose and capable of delivering for the population of Wales.</p>
<p><u>Consultation Question 4</u> 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>Given the scale of the task 2021 seems a very short time period.</p>
<p><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</p>

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?
Clearly moving towards convergence in all public service boards and stakeholder partnerships will take time. Transitional appointments and provisions are likely to be necessary.
<b><u>Consultation Question 6</u></b> What are your views on the approach which should be taken to determining the parameters of electoral reviews?
<u>See 5 above</u>

<b>Chapter 6</b>
<b><u>Consultation Question 7</u></b>
a) How can councils make more effective use of their elected members knowledge of, and connections in, their communities?
Stakeholder focus groups.
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?
Issue of concern that one attracts people to public service for the wrong reason. Care is needed in offering any remuneration.
<b><u>Consultation Question 8</u></b>
a) Are there other powers which local government should have? If so, what are they?
No comment
b) Are there other freedoms or flexibilities which local government should have? If

so, what are they?
See point Q15. Local Government should have “borrowing powers” for development. Other powers they have are not always used to best effect.
<u>Consultation Question 9</u>
a) Which areas offer the greatest scope for shared transactional services?
Back office HR, legal, admin and finance.
b) How might such arrangements be best developed?
Greater use of IT, streamlining services.
<u>Consultation Question 10</u>
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?
Benchmarking has been a well-established management tool. While Equality might suggest “consistency” it is sensible to apply a “Unity in Diversity” approach. Local situations, demographics, ethnicities require flexible considerations.
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?
It is considered that with Health & Wellbeing being so high on the political agenda that new partnership organisations should be established to deliver a seamless health and social care service. However representative stakeholders from other community based agencies should be regarded as an essential part of such partnership arrangements. The delivery of housing requires strategic planning along development, employment, and resource issues. Operationally the planning of health, education, domiciliary and recreational services also requires a cultural change to more inclusive stakeholder partnership arrangements. Since accountability is so vital there may have to be legislative, regulatory and guidance changes.
d) Which of the issues identified above or in your response should be prioritised for early resolution?

Given the prolonged nature of austerity it seems that development in all its forms needs to be prioritised. Obviously housing including more social housing needs to be a major part of this.

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?

Tai Ceredigion our Housing Association is acknowledged to be a bilingual employer. As a significant local employer all public services should seek to maintain not only high levels of welsh language fluency but also encourage welsh culture. Self-empowerment through literacy and education is part of the process towards strong effective community involvement and democracy.

b) How could positive effects be increased, or negative effects be mitigated?

Ways need to be found to incentivise and encourage the use of the welsh language.

Consultation Question 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.

Consultation Question 13

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.

a) Are there any positive or adverse effects not identified in the assessment?
b) Could the proposals be reformulated so as to increase the positive effects or reduce any possible adverse effects?
<p><u>Consultation Question 14</u> 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?
b) Could the proposals be reformulated so as to increase the positive or reduce any possible adverse effects?
<p><u>Consultation Question 15</u> Please provide any other comments you wish to make on the content of this consultation.</p>
It remains essential that any reorganisation of Local Government is only considered



in the context of reorganising local government finance. With respect there appears to be a rush to implement mergers without a necessary reorganisation of Local Government finance. The “council tax take” of an area is a consideration in the delivery of services and the assurance of longer term borrowing. If development is to be effectively achieved financial arrangements need to be reconfigured.

Some local authorities may have higher Capital reserves than others who have borrowing commitments. Likewise local demographics may require more or less service provision in areas such as social care and/or education.

Of particular interest and concern is the Common Housing Register. There needs to be a systematic review of how this is working for social housing tenants. Delivering homes should be a priority. However between different stakeholders public service provision should be carried out in such a way as to ensure both good practice and compliance with for example care in the community legislation.

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Llywodraeth Cymru  
Cathays Park  
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11 Mehefin 2018

Annwyl Gydweithwyr,

### **Cryfhau Llywodraeth Leol: Cyflawni dros ein Pobl**

Diolch am y cyfle i wneud sylwadau ar ddatganiad o fwriad Llywodraeth Cymru i sicrhau llywodraeth leol gryfach, sy'n fwy grymus yng Nghymru: 'Cryfhau Llywodraeth Leol: Cyflawni dros ein Pobl'.

Cynhelir yr ymgynghoriad hwn ar y papur gwrdd yng nghyd-destun agenda diwygio etholiadol ehangach yng Nghymru, ar ôl i newidiadau hefyd gael eu cynnig yn ddiweddar i etholiadau llywodraeth leol gan Lywodraeth Cymru ac i etholiadau Cynulliad Cenedlaethol Cymru gan Gomisiwn y Cynulliad.

Rydym eisoes wedi rhoi barn ar y meysydd hyn ac edrychwn ymlaen at barhau i weithio gyda'r holl bartneriaid perthnasol er mwyn cyfrannu at yr agenda diwygio a moderneiddio yng Nghymru.

## **Putting voters first Rhoi pleidleiswyr yn gyntaf**

An independent body established by Act of the UK Parliament  
Corff annibynnol a sefydlwyd gan Ddeddf Seneddol y DU



We welcome correspondence in Welsh and English  
Rydym yn croesawu gohebiaeth yn Gymraeg a Saesneg

### **Y Comisiwn Etholiadol**

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Cardiff CF14 3UZ

### **Y Comisiwn Etholiadol**

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Rydym wedi amlinellu barn y Comisiwn Etholiadol ar y cwestiynau hynny sy'n berthnasol i'n gwaith, sef Cwestiynau 4 a 6. Rydym hefyd wedi amlinellu nifer o risgiau ac argymhellion canlyniadol y bydd hi'n bwysig i Lywodraeth Cymru eu hystyried, yn ein barn ni, cyn gwneud unrhyw newidiadau er mwyn sicrhau bod y newidiadau hynny er budd pleidleiswyr.

#### **Cwestiwn Ymgynghori 4:**

***Mae'r ymgynghoriad yn awgrymu cynnal unrhyw etholiadau llywodraeth leol ym mis Mehefin 2021.***

***A oes unrhyw reswm pam na fyddai mis Mehefin 2021 yn ddyddiad addas? Os felly, awgrymwch ddyddiad arall gan nodi'r rhesymau pam y byddai'r dyddiad hwnnw yn fwy addas.***

Dylai Llywodraeth Cymru ystyried o ddifrif y risgiau gwirioneddol sy'n gysylltiedig â chynnal yr etholiadau llywodraeth leol yng Nghymru ym mis Mehefin 2021. Pe bai hynny'n digwydd, câi'r etholiadau hyn eu cynnal yn fuan ar ôl etholiadau Cynulliad Cenedlaethol Cymru, sydd i'w cynnal ym mis Mai yr un flwyddyn. Mae cyfres o ddiwygiadau eisoes wedi cael eu cynnig ar gyfer y ddwy set o etholiadau yng Nghymru a gaiff effaith ar bleidleiswyr, gweinyddwyr etholiadau ac ymgyrchwyr. Mae'r rhain yn cynnwys:

- Newidiadau sylweddol i'r etholfraint a'r gofrestr
- Diwygiadau posibl i'r system bleidleisio
- Newidiadau i'r rheolau ar wariant ymgyrchwyr

Byddai cynnal dau etholiad pwysig mor agos at ei gilydd yn peri risg, a byddai'r risg hon yn cynyddu pe bai diwygiadau amrywiol yn cael eu gwneud i'r ddau etholiad ar yr un pryd. Fodd bynnag, byddai cadw at yr amserlen bresennol a chynnal yr etholiadau llywodraeth leol ym mis Mai 2022 yn lleihau rhai o'r risgiau hyn.

Rydym wedi nodi isod y prif risgiau sy'n gysylltiedig â chynnal yr etholiadau ym mis Mehefin 2021, yn ein barn ni.

## **Pleidleiswyr**

Byddai dau ddyddiad cau ar gyfer cofrestru yn agos at ei gilydd a allai beri dryswch i bleidleiswyr a'r canlyniad posibl yw na fydd rhai pobl yn cofrestru mewn amser neu, yn wir, na fyddant yn cofrestru o gwbl.

Os ceir etholfraint wahanol ar gyfer pob set o etholiadau, yna gallai negeseuon yr ymgyrchoedd ymwybyddiaeth y cyhoedd fod yn wahanol ar gyfer pob etholiad hefyd. Gallai hyn olygu na fydd pleidleiswyr yn gwybod a oes hawl ganddynt i bleidleisio yn etholiadau Cynulliad Cenedlaethol Cymru, yr etholiadau llywodraeth leol neu'r ddau etholiad.

Os gwneir newidiadau i'r etholfraint, yna byddai grwpiau newydd o bleidleiswyr yn pleidleisio am y tro cyntaf.

Bydd papurau pleidleisio a systemau pleidleisio gwahanol ar gyfer pob etholiad a gallai pethau newid ymhellach os caiff systemau pleidleisio newydd eu cyflwyno ar gyfer yr etholiadau hyn.

Cyn yr etholiadau yn 2021, byddai angen i ni gynnal ymgyrch i godi ymwybyddiaeth o'r canlynol:

- yr etholiadau – gan gynnwys pryd y cânt eu cynnal;
- yr angen i gofrestru;
- y dyddiad cau ar gyfer cofrestru;
- sut i bleidleisio yn yr etholiadau;

Os cytunir ar newidiadau i'r etholfraint, byddem hefyd yn cynnal ymgyrchoedd ymwybyddiaeth y cyhoedd i egluro'r newidiadau hyn.

## **Gweinyddwyr etholiadau**

Os cynhelir yr etholiadau llywodraeth leol ym mis Mehefin 2021, yna byddai angen i Lywodraeth Cymru sicrhau bod gan Swyddogion Canlyniadau a'u staff yr adnoddau priodol i'w galluogi i reoli'r risgiau hynny a sicrhau bod y digwyddiadau etholiadol yn llwyddiannus. Byddai cynnal dau etholiad mor agos at ei gilydd yn golygu cymhlethdod a llwyth gwaith sylweddol i weinyddwyr. Yn ogystal, os cytunir ar unrhyw newidiadau i'r etholfraint, byddai gweinyddwyr eisoes yn addasu i systemau a rheolau newydd ac felly

byddai effaith ar feddalwedd yr etholiadau a byddai angen mwy o gymorth ar staff etholiadau beth bynnag.

Dylid cydnabod bod Swyddogion Canlyniadau a gweinyddwyr etholiadau yn gorfod ymdopi â llai o adnoddau ac mae nifer gynyddol o weithwyr proffesiynol medrus yn gadael timau etholiadau awdurdodau lleol. Maent hefyd yn dibynnu fwyfwy ar gronfa fach o gyflenwyr meddalwedd arbenigol a rheoli prosesau argraffu.

Os penderfynir cynnal yr etholiadau llywodraeth leol ym mis Mehefin 2021, yna bydd hi'n bwysig iawn bod Llywodraeth Cymru yn gweithio gyda Bwrdd Cydlynw Etholiadol Cymru er mwyn sicrhau bod pawb yn gweithredu mewn ffordd gydlynol a chydgyssylltiedig.

### **Ymgyrchwyr**

Bydd cynnal dau etholiad yn agos at ei gilydd yn arwain at negeseuon ymgyrchu gwahanol a chroes, o bosibl, ar gyfer etholiad Cynulliad Cenedlaethol Cymru ym mis Mai a'r etholiadau llywodraeth leol ym mis Mehefin, a allai beri dryswch i bleidleiswyr ynghylch pwy sy'n sefyll ym mhob etholiad.

Byddai hyn yn cael effaith ar y pleidiau gwleidyddol hefyd. Gallai rhai pleidiau, yn enwedig y rhai llai, ei chael hi'n anodd dod o hyd i'r adnoddau i gynnal ymgyrch effeithiol ledled y wlad ar gyfer y ddwy set o etholiadau gwahanol mor agos at ei gilydd.

### **Cyfnodau a reoleiddir**

Os cynhelir etholiadau Cynulliad Cenedlaethol Cymru ar 6 Mai 2021 a'r etholiadau llywodraeth leol ym mis Mehefin 2021, yna mae perygl y bydd yn rhaid i ymgyrchwyr gydymffurfio â rheolau cymhleth ar wariant.

Byddai'r rheolau ar wariant yn fwy cymhleth byth os cynhelir etholiad cyffredinol arfaethedig nesaf Senedd y Deyrnas Unedig ym mis Mai 2022, fel y darperir ar ei gyfer o ganlyniad i'r Ddeddf Seneddau Tymor Penodol. Y rheswm am hyn yw y byddai'r cyfnod a reoleiddir ar gyfer etholiad cyffredinol Senedd y Deyrnas Unedig yn gorgyffwrdd â dyddiad yr etholiadau llywodraeth leol. Dyma grynodedb o rai o'r goblygiadau:

**Senario 1: Etholiadau Cynulliad Cenedlaethol Cymru ym mis Mai 2021, etholiadau llywodraeth leol ym mis Mehefin 2021 ac etholiad cyffredinol Senedd y Deyrnas Unedig ar 5 Mai 2022**

- Byddai angen i ffurflen plaid wleidyddol ar gyfer etholiad y Cynulliad gynnwys rhywfaint o'r gwariant yr aed iddo ar ymgyrchoedd ar gyfer yr etholiad llywodraeth leol.
- Ar ôl diwrnod pleidleisio etholiad y Cynulliad, byddai angen i bleidiau nodi unrhyw wariant pellach yn eu ffurflen ar gyfer etholiad cyffredinol Senedd y Deyrnas Unedig, a ddylai gael ei chyflwyno yn 2022.
- Y canlyniad yw y byddai rhywfaint o wariant ar yr etholiadau llywodraeth leol yn cael ei gofnodi mewn dwy ffurflen wahanol ac o fewn cyfnodau gwahanol. Gallai hyn fod yn ddryslyd i ymgyrchwyr a byddai'r risg o adrodd yn anghywir ar wariant yn cynyddu.
- Byddai effeithiau tebyg i'w gweld yn achos y rheolau ar gyfer ymgyrchwyr nad ydynt yn bleidiau yn yr etholiadau llywodraeth leol, a fyddai'n arwain at reolau cymhleth i ymgyrchwyr.

**Senario 2: Etholiadau Cynulliad Cenedlaethol Cymru ym mis Mai 2021, etholiadau llywodraeth leol ym mis Mehefin 2021 ond dim etholiad cyffredinol Senedd y Deyrnas Unedig yn 2022**

- Byddai'r dyddiadau cau i adrodd ar wariant ymgeiswyr yn etholiadau'r Cynulliad yn agos at ddiwrnod pleidleisio yr etholiadau llywodraeth leol ym mis Mehefin 2021. Gallai fod gan ymgyrchwyr lai o adnoddau i'w defnyddio i ymgyrchu yn ystod yr etholiadau lleol, os byddent yn llenwi ffurflenni gwariant ar gyfer etholiadau'r Cynulliad ar yr un pryd.
- Byddai angen i ffurflen plaid wleidyddol ar gyfer etholiad y Cynulliad gynnwys rhywfaint o'r gwariant yr aed iddo ar ymgyrchoedd ar gyfer yr etholiad llywodraeth leol rhwng 6 Ionawr a 6 Mai 2021. Gallai'r rheolau hyn fod yn ddryslyd i bleidiau, ymgeiswyr ac asiantiaid, ac ymgyrchwyr, a byddai risg uwch o adrodd yn anghywir ar wariant.

### Argymhellwn y canlynol:

- Dylai Llywodraeth Cymru ystyried o ddifrif y risgiau gwirioneddol sy'n gysylltiedig â chynnal yr etholiadau llywodraeth leol yng Nghymru ym mis Mehefin 2021.
- Dylai Llywodraeth Cymru weithio'n agos gyda'r Comisiwn Etholiadol a phartneriaid allweddol eraill, drwy Fwrdd Cydlynu Etholiadol Cymru, er mwyn mesur yr effaith a lliniaru'r risgiau.
- Dylai Llywodraeth Cymru ymgynghori ag ymgyrchwyr ar oblygiadau cynnal dau etholiad ar ôl ei gilydd ym mis Mai a mis Mehefin 2021.
- Dylai'r rheolau ynghylch sut y caiff yr etholiad ei gynnal fod yn glir o leiaf chwe mis cyn y diwrnod pleidleisio: erbyn dechrau mis Rhagfyr 2020 ar gyfer etholiad ar ddechrau mis Mehefin 2021.
- Dylid gwneud penderfyniad clir ynghylch amseru ymhell o flaen llaw, fel y gall ymgyrchwyr gynllunio sut y bydd eu hymgyrchoedd yn cydymffurfio â'r rheolau ar wariant ac adrodd a fyddai'n gymwys o fis Ionawr 2021.
- Rhaid neilltuo arian priodol ar gyfer gweithgareddau ymwybyddiaeth y cyhoedd er mwyn sicrhau bod pleidleisiwyr yn deall y broses etholiadol, gan roi pwyslais penodol ar unrhyw newidiadau i'r etholfraint a'r system bleidleisio os caiff y diwygiadau hyn eu cyflwyno.
- Rhaid neilltuo arian priodol ar gyfer gweinyddwyr etholiadau fel y gallant weinyddu'r ddwy set o etholiadau.

### Cwestiwn Ymgynghori 6

#### ***Beth yw eich barn am y dull y dylid ei ddilyn i benderfynu ar derfynau'r adolygiadau etholiadol?***

Bydd angen i Gomisiwn Ffiniau a Democratiaeth Leol Cymru sicrhau bod unrhyw adolygiadau yn cael eu cwblhau (a bod y cynigion yn cael eu cymeradwyo gan y Gweinidog) mewn da bryd cyn unrhyw bleidlais y bydd y ffiniau newydd yn dod i rym ar ei chyfer, fel y gall gweinyddwyr, ymgeiswyr a phleidiau gynllunio ar gyfer yr etholiad ar sail y ffiniau newydd. Er enghraifft, byddai sicrhau bod y ffiniau'n cael eu cymeradwyo cyn 1 Rhagfyr yn ystod y flwyddyn cyn yr etholiad yn galluogi Swyddogion Cofrestru Etholiadol i gyhoeddi eu cofrestrau 1 Rhagfyr ar sail y ffiniau diwygiedig a'u rhannu â phleidiau gwleidyddol ac ymgyrchwyr. Bydd gan Swyddogion Cofrestru Etholiadol farn hefyd ar ba mor bell cyn cofrestrau 1 Rhagfyr y dylid cynnal adolygiadau er mwyn eu galluogi i wneud y paratodau angenrheidiol.

Gobeithio y bydd yr ymateb hwn yn ddefnyddiol i chi ac edrychwn ymlaen at weithio gyda Llywodraeth Cymru yn y dyfodol. Os hoffech gael rhagor o wybodaeth, cysylltwch â Rhydian Thomas, Pennaeth Comisiwn Etholiadol, Cymru gan ddefnyddio'r cyfeiriad e-bost isod: [rthomas@comisiwnetholiadol.org.uk](mailto:rthomas@comisiwnetholiadol.org.uk).

Yn gywir,



**Elan Closs Stephens CBE**  
**Comisiynydd Etholiadol, Cymru**



Strengthening Local Government  
Welsh Government  
Cathays Park  
Cardiff  
CF10 3NQ

11 June 2018

Dear Colleagues,

**Strengthening Local Government: Delivering for People**

Thank you for the opportunity to comment on the Welsh Government's statement of intent for a stronger, more empowered local government in Wales: 'Strengthening Local Government: Delivering for People'.

This green paper consultation takes place in the context of a wider electoral reform agenda in Wales, with changes having recently been proposed to local government elections by Welsh Government and to National Assembly for Wales elections by the Assembly Commission.

We provided views previously on these areas and we look forward to continuing to work with all relevant partners in contributing to the modernisation and reform agenda in Wales.

We have set out the Electoral Commission's views on those questions which are relevant to our work – these are Questions 4 and 6. We have also set out a number of risks and resulting recommendations which we believe it will be important for the Welsh Government to consider before implementing any changes to ensure that they are in the best interests of voters.

#### Consultation Question 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.***

Welsh Government should give careful consideration to the very real risks of holding the local government elections in Wales in June 2021. Doing so would mean that these elections would be held shortly after the National Assembly for Wales elections, scheduled for May of the same year. A series of reforms have already been proposed for both sets of elections in Wales which will have an impact on voters, electoral administrators and campaigners. These include:

- Significant changes to the franchise and the register
- Potential reform of the voting system
- Changes to the rules on campaigner spending

There would be a risk in holding two significant elections in such close proximity to one another, and this would be multiplied if we also see various reforms introduced for both elections at this time. Maintaining the current schedule, however, and holding the local government elections in May 2022 would reduce some of these risks.

We have set out below what we consider to be the key risks of holding the elections in June 2021.

#### **Voters**

There would be two registration deadlines in close proximity which could lead to confusion for voters possibly resulting in some people not registering in time, or indeed not registering at all.

If the franchise is different for each set of elections then the public awareness campaign messages could also be different for each election. This could lead to voters not knowing whether they are entitled to vote in the National Assembly for Wales elections, the local government elections or both.

If changes to the franchise are introduced then there would be new groups of voters voting for the very first time.

There will be different ballot papers and voting systems for each election which could be further exacerbated if new voting systems are introduced for these elections.

In advance of the elections in 2021, we would need to run a campaign to raise awareness of:

- the polls – including when these would take place;
- the need to register;
- the deadline to register;
- how to vote in the polls;

If changes to the franchise are agreed, we would also run public awareness campaigns to explain these changes.

### **Electoral administrators**

If the local government elections are held in June 2021, then the Welsh Government would need to ensure that Returning Officers and their staff are properly resourced to enable them to manage these risks and ensure that the electoral events run successfully. The complexity and workload for administrators in holding two elections in such close proximity would be significant. In addition to this, if any changes to the franchise are agreed, administrators would already be adapting to new systems and rules and so there would be an impact on the elections software and an increase in the support required by elections staff in any case.

It should also be acknowledged that Returning Officers and electoral administrators are faced with reduced resources and a growing number of skilled professionals leaving local authority elections teams. They are also increasingly reliant on a relatively small pool of specialist software and print management suppliers.

If the decision is taken to hold the local government elections in June 2021 then it will be particularly important that Welsh Government work with the Wales Electoral Coordination Board to ensure a coherent and coordinated approach.

## Campaigners

Two elections in close proximity will result in different and potentially conflicting campaign messages for the May Welsh general election and the June local government elections, which could lead to confusion among voters as to who is standing in each of the elections.

There would also be an impact on political parties. Some parties, especially the smaller ones, could have difficulty in finding the resources to deliver an effective campaign across the country for two sets of separate elections in such close proximity.

## Regulated periods

If National Assembly for Wales elections take place on 6 May 2021, followed by local government elections in June 2021, there is a risk that campaigners will be subject to complex spending rules.

The spending rules would be even more complex if the next scheduled UK Parliamentary general election (UKPGE) takes place in May 2022 as provided for as a result of the Fixed-Term Parliaments Act. This is because the UKPGE regulated period for parties would overlap with the date for the local government elections. This is a summary of some of the implications:

### **Scenario 1: National Assembly for Wales in May 2021, local government elections in June 2021 and a UK Parliamentary general election on 5 May 2022**

- The political party return for the Assembly election would need to include some spending undertaken on local government election campaigning.
- After polling day for the Assembly election, further spending would need to be reported in the UKPGE return for parties, which should be submitted in 2022.
- This would mean some spending on local government elections would be reported in two different returns and with different timeframes. This could be confusing for campaigners, and there would be a heightened risk that spending would be misreported.
- There would be similar effects for the rules for non-party campaigners at local government elections, resulting in complex rules for campaigners.

**Scenario 2: National Assembly for Wales elections in May 2021, local government elections in June 2021, but no UK Parliamentary general election in 2022**

- The reporting deadlines for spending by candidates at the Assembly elections would be close to polling day for the local government elections in June 2021. Campaigners could have fewer resources to focus on campaigning at the local elections, if they are compiling spending returns for the Assembly elections at the same time.
- The political party return for the Assembly election would need to include some spending undertaken on local election campaigning between 6 January and 6 May 2021. These rules could cause confusion for parties, candidates and agents, and campaigners, where there would be a heightened risk that spending would be misreported.

**We recommend that:**

- Welsh Government gives very careful consideration to the real risks of holding the local government elections in Wales in June 2021.
- Welsh Government works closely with the Electoral Commission and all other key partners through the WECB to measure the impact and mitigate the risks;
- Welsh Government consults campaigners on the implications of holding consecutive polls in May and June 2021.
- The rules on how the election will be conducted should be clear from at least six months before polling day: by early December 2020 for an early June 2021 poll.
- There is a clear decision about timing sufficiently far in advance, so that campaigners can plan how their campaigns will comply with the spending and reporting rules that would apply from January 2021
- Appropriate funding must be made available for public awareness activities to ensure voters understand the election process, with particular emphasis on any changes to the franchise and the voting system if these reforms are introduced.
- Appropriate funding must be made available to electoral administrators so that they can deliver both sets of elections.

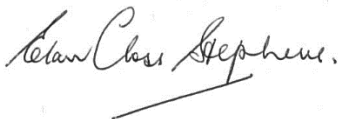
## Consultation Question 6

### ***What are your views on the approach which should be taken to determining the parameters of electoral reviews?***

The Local Government Boundary Commission for Wales will need to ensure that any reviews are concluded (and the proposals approved by the Minister) sufficiently ahead of any poll that the boundaries will come into effect for, in order that administrators, candidates and parties are able to plan for the election based on the new boundaries. For example, ensuring the boundaries are approved in advance of 1 December in the year preceding the election would enable Electoral Registration Officers to publish their 1 December registers based on the revised boundaries and supply these to political parties and campaigners. Electoral Registration Officers will also have a view on how far in advance of the 1 December register reviews should be concluded to enable them to carry out the necessary preparations.

I hope that you find this response useful and we look forward to working with the Welsh Government going forward. If you would like any additional information, please contact Rhydian Thomas, Head of Electoral Commission, Wales at the email address below: [rtomas@electoralcommission.org.uk](mailto:rtomas@electoralcommission.org.uk).

Yours faithfully,



**Elan Closs Stephens CBE**  
**Electoral Commissioner, Wales**

# Cymdeithas Cyfieithwyr Cymru

## Ymateb i ymgynghoriad Llywodraeth Cymru, Cryfhau Llywodraeth Leol: Cyflawni dros ein Pobl

### 1. Cyflwyniad

Mae'r ymateb hwn gan Gymdeithas Cyfieithwyr Cymru yn canolbwyntio ar swyddogaeth bwysig cyfieithu wrth ddatblygu a chryfhau'r defnydd o'r Gymraeg yng ngweinyddiaeth Llywodraeth Leol, wrth weithredu Safonau'r Gymraeg, ac wrth anelu at y nod o gael miliwn o siaradwyr Cymraeg erbyn 2050.

Cefnogwn y gred, ym mhwynt 6.59 y Papur Gwyrdd, y byddai creu awdurdodau newydd yn cynnig cyfle i gryfhau'r defnydd o'r Gymraeg. Mae hyn yn enwedig o wir am gyfieithu. O ganlyniad gellid sefydlu unedau cyfieithu cryf ym mhob awdurdod newydd. Byddai hyn yn ei dro yn sicrhau gwelliannau a threfniadau mwy effeithiol na'r ddarpariaeth bresennol sy'n dameidiog ac anghyson: cyflogir timau cryf gan rai cynghorau, llai mewn eraill, a dim un cyfieithydd mewn nifer o gynghorau. Ac yn sail i'r cyfan fyddai safonau proffesiynol y Gymdeithas hon.

O fwrw ymlaen â'r cynlluniau sydd yn y Papur Gwyrdd, gobaith Cymdeithas Cyfieithwyr Cymru yw y bydd pob awdurdod newydd yn rhoi bri ar gyfieithu fel crefft o'r dechrau'n deg, ac yn cydnabod statws proffesiynol cyfieithu fel galwedigaeth ac nid fel swydd weinyddol. Trwy roi gwerth ar y Gymraeg fel sgil ynddi'i hun yn y modd hwn, ac arddel yr egwyddorion hyn, bydd awdurdodau'n gwneud datganiad cadarnhaol fod y Gymraeg yn greiddiol bwysig i'w dulliau gweithio a'u gweinyddiaeth fewnol.

Noder hefyd awydd Llywodraeth Cymru yn Cymraeg 2050 (tud. 73) 'i weld y proffesiwn [cyfieithu] yn esblygu ac yn addasu ar gyfer y dyfodol ... Bydd hyn yn golygu parhau i sicrhau cyflenwad parod o gyfieithwyr proffesiynol ac ieithyddion graddedig â sgiliau modern, a gefnogir gan drefn achredu a rheoleiddio gadarn sy'n seiliedig ar safonau ac ymddygiad proffesiynol.'

### 2. Unedau cyfieithu cryf

2.1 Bydd diwygio llywodraeth leol yn cynnig cyfle heb ei ail i sefydlu unedau cyfieithu cryf ym mhob awdurdod lleol newydd, unedau ag iddynt strwythur staffio bendant a fydd yn caniatáu meithrin arbenigedd. Dylai'r strwythur hwnnw gynnwys cyfieithwyr ag amrywiaeth o brofiad ac oedran, cyfieithwyr ar bob lefel o'u gyrfaedd, a chefnogaeth weinyddol gan swyddogion sy'n deall hanfodion prosesau cyfieithu. Byddai pob un ar gyflogau a fyddai'n adlewyrchu ac yn cydnabod cyfieithu fel proffesiwn.

2.2 Dylai pob uned gyfieithu gynnwys digon o staff i ymdopi â'r galw. Rydym o'r farn y byddai angen i awdurdod gyflogi o leiaf 10 cyfieithydd ar gyfer hyn. Ar y brig byddai pennaeth a fyddai'n gyfieithydd gyda chymwysterau a phrofiad ac a fyddai'n aelod Cyflawn o'r Gymdeithas (a/neu hefyd yn aelod Cyfieithu ar y Pryd). Dylid sicrhau fod yr uwch gyfieithwyr hefyd yn aelodau Cyflawn, a'r

cyfieithwyr eraill yn aelodau Sylfaenol ac yn gweithio tuag at uwchraddio'u statws i aelodaeth Gyflawn. Dylid mynnu fod cyfieithwyr dan hyfforddiant yn gweithio tuag at aelodaeth Sylfaenol ac yn cyrraedd y nod hwnnw o fewn cyfnod rhesymol, dyweder 2 flynedd. Byddai'r un peth yn wir am y cyfieithwyr hynny sy'n darparu gwasanaeth cyfieithu ar y pryd.

- 2.3** Bydd angen sicrhau fod awdurdodau'n cynnig digon o gyfleoedd i gyfieithwyr ddatblygu'n broffesiynol a bod llwybrau dilyniant clir ar gael iddynt hwy er mwyn sicrhau nad yw cyfieithwyr da yn cael eu colli a bod digon o gymhelliant proffesiynol iddynt yn eu swyddi. Byddai'n werthfawr datblygu set sgiliau i gyfieithwyr ar bob lefel a bod y rhain yn cael eu mabwysiadu gan bob awdurdod lleol. Byddai strwythur gyrfa glir a phendant o'r fath yn gymorth i ddenu pobl dalentog i'r unedau a'u cadw ar ôl hynny. Wrth benodi cyfieithwyr dan hyfforddiant mae angen sicrhau y bydd hi'n bosib i'r rhain symud ymlaen i'r lefel nesaf ar ddiwedd eu cyfnod o hyfforddiant ac os ydynt yn ddigon abl fel cyfieithwyr.

Bydd y cyrsiau ôl-raddedig a gynigir gan Brifysgol Aberystwyth (y Cynllun Astudiaethau Cyfieithu Proffesiynol) a Phrifysgol Cymru Y Drindod Dewi Sant (y Dystysgrif Ôl-raddedig Cyfieithu ar y Pryd) yn allweddol wrth ddatblygu sgiliau a gwybodaeth cyfieithwyr.

- 2.4** Yn gefn i hyn, bydd angen sicrhau bod polisïau gweithio ystwyth, oriau hyblyg, gweithio o gartref ac ati, yn cael eu defnyddio'n gadarnhaol ac yn greadigol i sicrhau cydbwysedd rhwng bywyd a gwaith.
- 2.5** Fe fydd hi'n bwysig sicrhau cefnogaeth wleidyddol a chorfforaethol gadarn i'r unedau cyfieithu hyn. Bydd hi'n bwysig llunio canllawiau safonol ynghylch rôl unedau cyfieithu a beth y gellid disgwyl yn rhesymol iddynt eu cyflawni. Mae angen sicrhau fod aelodau etholedig a swyddogion ar y lefel uchaf yn deall beth yw cyfieithu, sut mae'n gweithio, y cyfraniad y mae'n ei wneud i waith a delwedd awdurdod, a phwysigrwydd cyfieithu wrth hyrwyddo Safonau'r Gymraeg. Byddem yn argymhell, felly, y dylai uned gyfieithu pob awdurdod berthyn i adran y Prif Weithredwr.
- 2.6** Ond, nid yw gweinyddu yn Gymraeg nac ymateb i ofynion Safonau'r Gymraeg yn rhywbeth y gellir ei wireddu trwy unedau cyfieithu yn unig. Yn yr un modd nid yw'n rhywbeth y gellir ei wireddu heb gymorth cyfieithwyr. Felly, mae angen gosod cyfieithu yn y cyd-destun ehangach. Mae angen gwybod beth yw sgiliau iaith staff yr awdurdod, ar lafar ac yn ysgrifenedig, trwy gynnal asesiad cynhwysfawr a thrylwyr, er mwyn creu darlun a fydd yn caniatáu i awdurdodau fapio'u hanghenion ieithyddol. Y nod fyddai galluogi mwy o swyddogion i weithio yn y ddwy iaith gan ryddhau unedau cyfieithu i ganolbwyntio ar yr hyn sy'n flaenoriaeth i'r awdurdodau unigol. Gallai hyn arwain at unedau cyfieithu yn canolbwyntio ar fathau arbennig o waith cyfieithu, ac yn cynnig gwasanaeth golygu a phrawf ddarllen.

### **3. A allai cyfieithu arwain y ffordd?**

Tybed a oes yna le i gyfieithu arwain y ffordd wrth i awdurdodau chwilio am



ddulliau o gydweithio'n effeithiol yn y broses o gyflawni canlyniadau a gwella perfformiad? Byddai hyn yn arwain at well cysondeb a safon wrth gyfieithu dogfennau, a byddai hyn hefyd yn arbed arian.

Gwasanaeth yw cyfieithu, ond mae'r cyhuddiad yn cael ei wneud yn aml fod dyblygu gwaith cyfieithu yn digwydd a bod hyn yn wastraffus. Mae nifer o ffurflenni/dogfennau ac ati yn debyg ym mhob awdurdod am eu bod yn deillio o ddeddfwriaeth ac o ddarparu'r un gwasanaethau neu lunio'r un polisïau. Clywsom gan gwmni cyfieithu oedd wedi cael yn union yr un ffurflenni a chanllawiau i'w cyfieithu gan ddau gyngor gwahanol ym maes trwyddedu, sy'n deillio o ddeddfwriaeth y DU, ac mae'n amlwg o'r we bod cynghorau eraill wedi'u cyfieithu hefyd, felly mae nifer o fersiynau Cymraeg gwahanol o ffurflenni sydd yn union yr un peth yn Saesneg.

Dylid ystyried sefydlu trefn ac arfer o gydweithio a chyd-lynu rhwng swyddogion gwahanol awdurdodau lle gellid creu ffurflenni/dogfennau cyffredin a fyddai'n addas i'w defnyddio gan bob awdurdod ac yna rannu'r gwaith o'u cyfieithu. Oes angen i ni gynhyrchu 22 fersiwn o ddogfennau tebyg?

#### **4. Cyfieithu ar y pryd**

Mae cyfieithu ar y pryd yn sicrhau y caiff pob un gyfrannu mewn cyfarfod yn ei ddewis iaith yn ddi-rwystr.

Dylid sicrhau, felly, fod offer cyfieithu ar y pryd priodol ar gael ym mhob awdurdod lleol newydd. Dylid sicrhau fod offer sefydlog ym mhrif siambr pob awdurdod ac mewn ystafelloedd pwyllgor a ddefnyddir yn aml, a bod offer symudol ar gael ar gyfer cyfarfodydd a gynhelir mewn ystafelloedd llai ac ar gyfer cyfarfodydd cyhoeddus mewn mannau eraill e.e. canolfannau cymunedol, ysgolion. Byddai'n fanteisiol pe byddai awdurdodau yn cael offer symudol sydd yn gydnaws, er mwyn hwyluso trefniadau benthg pan gyfyd yr angen, e.e. cynadleddau.

#### **5. Defnyddio a manteisio ar dechnoleg**

Bydd hi'n bwysig sicrhau fod pob awdurdod yn gwneud y defnydd gorau o dechnoleg ac yn rhannu adnoddau. Bydd hyn yn arbennig o wir yn achos cofau cyfieithu lle mae'n bwysig sicrhau y bydd hi'n bosib i sefydliadau cyhoeddus rannu cofau cyfieithu a chronfeydd terminoleg, yn ogystal â ffurflenni a dogfennau. I weithredu hyn yn effeithiol, rhaid mynd i'r afael â materion diogelu data a chyfrinachedd, hawlfraint, ac eiddo deallusol.

Mae lle pwysig i gyfieithu peiranyddol mewn unedau cyfieithu, serch bod hyn yn bwnc sy'n hollti'r farn yn fyd-eang. Mae manteision amlwg iddo yn enwedig os caiff cyfieithwyr yr hyfforddiant priodol wrth ôl-olygu'r cyfieithiadau peiranyddol. Mae Gwasanaeth Cyfieithu a Chofnodi'r Cynulliad Cenedlaethol wedi bod yn arloesi yn y maes hwn ers sawl blwyddyn, ac fe allai eu profiad a'u harbenigedd hwy fod yn enghraifft o arfer da y gellid ei rannu.

Hefyd dylid defnyddio technoleg at ddibenion eraill, megis sefydlu trefniadau llif

gwaith clir ac effeithiol ar draws yr awdurdod, fel rhan o'r broses o sicrhau dealltwriaeth o sut i ddefnyddio'r gwasanaeth cyfieithu.

Bydd angen sicrhau fod y seilwaith TG yn yr awdurdodau newydd yn ddigon cadarn i ddarparu ar gyfer anghenion unedau cyfieithu, gan gynnwys, rhannu cofau cyfieithu, defnyddio cyfieithu peirianyddol, ac anfon a derbyn ffeiliau mawr. Bydd angen i'r seilwaith hwn fod yn hyblyg o ran lleoliad y gwaith cyfieithu, ac yn caniatáu i gyfieithwyr weithio mewn lleoliadau ar wahân i'w swyddfeydd arferol, e.e. gartref, neu mewn swyddfa arall o eiddo'r awdurdod. Gallai hyn, yn ei dro, fod yn ystyriaeth bwysig wrth ddenu a chadw'r cyfieithwyr gorau ac wrth ddarparu gwasanaeth Cymraeg ym mhob cwr o diriogaeth yr awdurdod newydd.

## **6. Cymdeithas Cyfieithwyr Cymru**

Credwn y bydd swyddogaeth Cymdeithas Cyfieithwyr Cymru a'r safonau proffesiynol y mae'n eu harddel a'u hyrwyddo'n bwysicach nag erioed yn ystod y blynyddoedd i ddod wrth anelu at y nod o gael miliwn o siaradwyr Cymraeg erbyn 2050 a gweithredu Safonau'r Gymraeg. Ein gobaith yw gweld yr holl awdurdodau newydd yn arddel safonau proffesiynol y Gymdeithas o'r dechrau'n deg fel y dull o feincnodi safonau proffesiynol ac o sicrhau ansawdd.

Mae'r Gymdeithas yn awyddus i chwarae'i rhan. Gallwn gynghori awdurdodau ynghylch darparu a defnyddio gwasanaethau cyfieithu proffesiynol, yn ogystal â hybu a hyrwyddo cydweithio a chreu cysylltiadau. Rydym mewn sefyllfa ardderchog i gefnogi'r unedau cyfieithu newydd, hwyluso rhannu arferion gorau ac adnoddau, a dod a phobol at ei gilydd er mwyn i staff unedau cyfieithu ddysgu oddi wrth ei gilydd. Mae gennym rôl bwysig hefyd wrth ddarparu hyfforddiant, hybu datblygiad proffesiynol, a hyrwyddo'r proffesiwn cyfieithu. Mae gennym brofiad eang o drefnu gweithdai sy'n ymateb i anghenion cyfieithwyr wrth eu gwaith, hyrwyddo datblygiad proffesiynol, a chydweithio â sefydliadau Addysg Uwch - yn enwedig y Coleg Cymraeg Cenedlaethol - er budd y proffesiwn/diwydiant cyfieithu.

I gael gwybod rhagor am Gymdeithas Cyfieithwyr Cymru, y corff sy'n arwain, datblygu a hyrwyddo cyfieithu proffesiynol yng Nghymru, ewch i'n gwefan, <https://www.cyfieithwyr.cymru/cy/>.

## **7. I grynhoi**

Dylid sicrhau:

- > y bydd unedau cyfieithu cryf yn yr holl awdurdodau newydd, a fydd yn perthyn i adran y Prif Weithredwr, ac iddynt strwythur staffio pendant.
- > y bydd digon o gyfleoedd i gyfieithwyr ddatblygu'n broffesiynol a meithrin arbenigedd.
- > y gwneir y defnydd gorau a mwyaf effeithiol o dechnoleg.
- > y bydd offer cyfieithu ar y pryd priodol ar gael ym mhob awdurdod.
- > y bydd yr holl awdurdodau newydd yn arddel safonau proffesiynol y Gymdeithas.

## **Torfaen Labour Local Campaign Forum response to Strengthening Local Government Green Paper**

The Strengthening Local Government Green Paper was discussed by Torfaen Labour Party Local Campaign Forum on 7 June 2018 by 21 members (14 rank and file and 7 elected members). It was the unanimous view of the Forum that the proposal to make significant changes such as those proposed in the Green Paper is unwise in the present age of austerity since there are significant costs allied to making such changes. While the Forum is not against change it would be more prepared to give the consideration requested in the Green Paper's questionnaire when times arrive that are more conducive to being able to bear such costs.

To give a response to the Questionnaire now, therefore, seems to suggest that we see some merit in the proposals the Green paper makes for change at this time and so, instead, we offer this letter as our response. In a nutshell our view is that **Welsh Government should not proceed now with re-organisation of Local Government and any future proposal for re-organisation should commence after the end of austerity.**

On a more positive note, the Forum wanted to point out the strides that Torfaen County Borough Council has made towards collaboration both with other authorities and organisations, government, voluntary sector and and private, to bring down costs and, most importantly, increase efficiency and effectiveness for our people. These collaborations and partnerships have grown organically from an understanding that working together gives a better service and not from direction from Welsh or UK government. This way of making change has been taken on positively by elected members, local government officers along with with the staff and guiding structures of other organisations because these people have recognised the benefits of working together. Such positivity, the Forum believes, might not have been so evident had the changes been imposed.

As evidence, we refer you to the following collaborations and partnerships which the Forum believes have made this significant difference to the services Torfaen County Borough Council provides:-

**Education Achievement Service (EAS)** - with Caerphilly, Blaenau Gwent, Newport and Monmouthshire

**Health and Social Services** - with other Gwent authorities and AB Health Board sharing executive functions

**Information Technology** - Shared service with Monmouthshire and Gwent Police

**Community Safety** - with Gwent Police sharing staff and facilities

**Revenues and Benefits** – with Monmouthshire

**Waste Management** – procurement with several boroughs in SE Wales

**Trading Standards** - with Citizens Advice

**Play Services** - with Monmouthshire, and Cwmbran and Pontypool Community Councils delivering to children all year round

John Killick

Torfaen LCF Secretary

## **Welsh Government Green Paper Consultation Document**

### **Strengthening Local Government: Delivering for People**

**strengtheninglocalgov@gov.wales**

#### **Response from Torfaen County Borough Council Labour Group – June 2018**

Thank you for the opportunity to respond to this Green Paper. Please find below our thoughts about the issues raised and questions asked by the document. We have numbered the points for easy reference.

1. We welcome the commitment in the Green Paper to strong and empowered Local Government. Compared to successful nations across Europe, Local Government across Britain has suffered from a lack of parity of esteem. We believe that devolution is an opportunity for this to change in Wales and to build a strong partnership between Local and National Government.
2. We do not want to take a suspicious or adversarial approach to this consultation, or to build an 'us and them' mentality between Local Government and the Welsh Government. We believe that our levels of governance work best when a partnership approach is adopted, seeking to work together on common objectives. After all, we serve the same people and share a belief in social justice and public services. We also understand that Welsh Government Ministers want to look at this issue because they share our concerns about the future of public services, because they value them and want to preserve them in the face of austerity. We share this central ambition, even if we sometimes differ on how to deliver it.
3. We want to work with you in the future in that spirit of partnership. This consultation document, and certainly our response to it, is not about the status quo versus change, but about how we change most effectively to address the challenges of the future. We have a vision of Councils working constructively together, along with other public service organisations, to deliver services.
4. However, we feel that many of the implicit judgements and presumptions made in the Green paper and associated debate about Local Government are a decade or more out of date. This is important as there is a new generation of council leaders and councillors, many of whom were only elected a year or so ago. This group are committed to improving the way we work together, and to collaboration and innovation where that

benefits services. The danger with top-down, wholesale structural reform is that it stifles this progress before it has a chance to bear fruit.

5. We are not against change and are always happy to discuss these issues, but change must be based on evidence, not on supposition. Change for change's sake won't improve outcomes.
6. We must all resist the tendency of administrations at one level to blame the other level for failings and claim sole credit for successes, and instead work in a spirit of partnership.
7. We believe that the Green Paper and associated debate don't recognise the track record of Welsh councils in difficult times over the past decade. Despite having a third less money in real terms, councils have kept key services running – showing leadership, values and innovation in the face of increasing demand and reducing resources. We recognise the financial situation for Welsh Councils has not been as bad as in England, but that does not mean that austerity has not had a dramatic impact on Welsh Councils. We should be clear that the future sustainability of local services is threatened by austerity, not by the number of councils.
8. Local Government in Wales has a track record of balancing budgets despite huge financial pressures, acting with financial discipline to ensure that services are not undermined. This track record of balancing budgets is not the case across the public sector, which inevitably makes us as councils question why we are the target of calls for reorganisation.
9. We believe the Green paper doesn't sufficiently recognise where Councils have worked effectively in partnership with Welsh Government – for example to successfully deliver massively increased recycling rates, and to build schools fit for the 21<sup>st</sup> century for our young people to learn in.
10. The debate so far has not recognised how innovative many councils have been in finding new, collaborative ways of running services. In Torfaen, our IT services are run jointly across 4 councils and Gwent Police. We run shared services with neighbouring councils in areas from Public Protection to Revenues and Benefits, and we are keen to explore further avenues for collaboration. We are exploring ways of working with the other four councils and Health Board in Gwent to join up health and social care. We have worked partnership with 9 other councils as part of the Cardiff Capital Region City Deal. For us, the City Deal is not just an investment pot – it's a whole new way of working collaboratively across south-east Wales on areas from economic development to planning to transport. These areas of innovation and collaboration show that having 22 councils does not mean we have to do everything 22 times or in 22 different ways.

11. We feel that this track record, coupled with our ambitions moving forward, show that the alternative to top-down, wholesale reorganisation is not the status quo. Where there is resistance to progress on this agenda, we are not opposed to measures to encourage or direct co-operation, as long as the safeguarding and improvement of local public services is kept at the heart of discussions.
12. We recognize that there is more work to do on collaboration and innovation. For example, we would welcome the Welsh Government reviewing two critical public service collaboration vehicles, Public Service Boards and Regional Partnership Boards. Whilst distinct, there is commonality between their aims, the population data they rely on and the parties attending meetings. One operates on a local government foot print, the other on the health board foot print. We strongly feel that there is merit in both boards being regional (on a Health Board footprint) to advance joined up public service and collaboration with local service delivery. We also support the view that the two boards could become one, with work streams supporting the requirements of both Acts.
13. Welsh Government and Local Government in Wales face a daunting number of challenges at the moment –
  - a. preserving services threatened by austerity,
  - b. dealing with the consequences of Brexit,
  - c. continuing to improve key services like schools and social care,
  - d. dealing with the impact of benefit reform and an ageing population in many of our towns, with the resultant pressure on key services
  - e. rising to the challenge of the WFG Act to change our way of thinking to long-term rather than quick fixes.
14. We want to work as partners to address these common challenges. Adding the challenge of structural re-organisation would provide a massive distraction to what should be our key focus. The evidence from past reorganisations, here and elsewhere, show that any large structural re-organisation is always disruptive and always means focus drifts from core service delivery to the reorganisation itself over a long period of time.  
Can we afford the inevitable cost and distraction at this time, given the demands placed on us by austerity?
15. Arguments always seem to focus around the number of councils – but we feel that is a red herring. What matters, for sustainability and for service delivery, is not the number of ‘front doors’, but how services are delivered. Collaboration is key, as it can achieve scale where that is required whilst retaining a local connection where that is important.
16. The principle of subsidiarity is key. Local democracy is something that should be valued, and there is great danger in creating distant regional authorities that will struggle to retain a local nexus.

17. We believe the Green Paper overlooks the benefits of our unitary system, compared to the two-tier system in many parts of England. Colleagues in England envy our unitary approach and report a great deal of frustration and confusion, where citizens don't know which council does what.
18. Most cost estimates put the cost of a large re-organisation as above £200m. At a time when the Welsh Government's budget is under such strain thanks to austerity, is reorganisation really the best use of that sum of money? We have yet to see a detailed cost-benefit analysis of the costs and savings of a structural reorganisation – something which would surely be needed to demonstrate value for money – and feel that there is far too much presumption and guesswork being used to estimate the savings that would result. We must also be alive to the fact that past evidence shows that the cost of reorganisation is almost always underestimated, and the savings usually overestimated. If we are not careful, we will end up spending hundreds of millions of pounds for a restructuring that brings neither the savings nor the performance improvements anticipated.
19. We would question whether all parts of Welsh Government are clear and in agreement about what they want from Local Government? We suspect that whereas some want strong, independent local decision-making, others would prefer obedient local administrators of Welsh Government decisions. This is important as form must follow function, rather than the other way around.
20. We see little, if any, evidence that scale equals improved performance, either here in Wales or elsewhere in the world. The academic evidence points towards size having a limited impact on performance. Across Wales and beyond, there is little evidence of larger units delivering better outcomes, in Local Government or in other parts of public services. Funding, leadership, organisational culture and a strategic focus on performance are the determining factors on positive outcomes, not scale.
21. Similarly, no one size of council is ideal for the different services we run. Different services have a different ideal scale – some benefit from local focus, others benefit more from scale. This points towards collaboration for the areas where we need scale but retaining local focus where that is beneficial.
22. There appears to be much confusion about the employment implications of reorganisation. This is key as it must be understood that if a reorganisation delivered large revenue savings, this would be at the cost of large numbers of public sector workers' jobs. Or if jobs were protected as part of a reorganisation, the savings needed to make reorganisation pay would not be made. The private sector tends to drive down costs in reorganisation by ruthlessly cutting jobs and costs in a short space of time with the bare minimum of process. As a council that believes in a partnership approach with our employees and their Trade Unions, we would certainly object to any attempt to treat our dedicated Local Government workers in that way. We are also increasingly



concerned about staff stress and anxiety, which is inevitably exacerbated by talk of reorganisation and the job insecurity and disruption that this brings.

23. The importance of local government employment in some of our most deprived areas should not be overlooked. Outside of affluent areas or large urban centres, are there the private sector jobs to fill the gap? The implications of losing Local Government employment in some of Wales' towns would be catastrophic for their local economies.
24. We are concerned about the severe impact of structural reorganisation on the Cardiff Capital Region City Deal. The structure of the City Deal took a great deal of time and effort to agree on, and just as we are beginning to make progress, a reorganisation of the number of councils within the region would risk undoing this good work.

Yours sincerely,

Torfaen Labour Group



Chartered  
Institute of  
Housing  
Cymru

# Weighing the options

Local Government mergers  
and the perceived impact on  
housing delivery

Catherine May & Matthew Kennedy



Tyfu Tai Cymru -  
Because Housing Matters

# Background

Tyfu Tai Cymru (TTC) is a 5-year housing policy project with a focus on providing insightful analysis and filling evidence gaps to support policy progression. Funded by the Oak Foundation the project is managed by the Chartered Institute of Housing Cymru. TTC works across three key strands:

- Building the right homes to meet demand
- Making sure housing is always a priority for local government
- Demonstrating housing's role in keeping people well and healthy



## **Building the right homes to meet demand**

is vital given the current housing need in Wales, the increase in the ageing population and the need to prepare the right homes for future generations. We welcome the Welsh Government's 20,000 affordable homes target and the emphasis on housing within 'Prosperity for All' – working towards this ambition alongside accelerating delivery should also drive up standards, quality and accessibility.

**Making sure housing is always a priority for Local Government**, particularly as local authorities continue to consider how best to deliver high quality public services against the backdrop of austerity is vitally important. For us, understanding how housing functions within local authorities operate in this climate is imperative, particularly given the varying picture of housing functions across Wales, and the recent drive for local authorities to begin building homes again.

**Demonstrating housing's role in keeping people well and healthy** is something that is recognised as vital by many people from the housing sector across Wales. Innovative practices have led to reductions in delayed discharges from hospital, less pressure on GP services, and the speeding-up of the installation of vital home adaptations.

The TTC project will focus on how this practice can be spread and shared across Wales to ensure everyone is able to access fair and consistent services no matter where they live.

Mirroring the remit of CIH Cymru, the TTC project operates on a cross-tenure basis, recognising the need to ensure that whether renting or buying, people should have access to a safe, secure, affordable home.

In addition to a governance group made-up of experts from across the housing sector, the project team comprises:

**Catherine.may@cih.org**  
(Tyfu Tai Cymru Manager, CIH Cymru)

**Matthew.kennedy@cih.org**  
(Policy & Public Affairs Manager, CIH Cymru)

**Matthew.dicks@cih.org**  
(Director, CIH Cymru)

**Sharon.dean@cih.org**  
(Customer Support Coordinator, CIH Cymru)



# 1. Introduction

One of the aims of the Tyfu Tai Cymru project is to build the profile of housing in local government by amplifying the voices of professionals in housing departments across Wales. This report focuses on the proposed reforms of local government, with our response shaped by what staff told us about their expectations of this major shift in the public sector landscape.

Local Government reform is being conducted in-line with the aspiration of Welsh Government, who stated in 'Prosperity for All' that:

**“Achieving our ambitions for Wales will require a different relationship not just between the Welsh Government and local authorities, but also between local authorities themselves. It is only through closer work, on a consistent regional basis, that the resilience and responsiveness of services can be maintained in the future”**

In progressing the practicalities of delivering on this aim the Cabinet Secretary for Local Government and Public Services launched the Consultation Green Paper, 'Strengthening Local Government, Delivering for People' on 20 March 2018.

The Green Paper puts forward different ways through which local authorities could potentially merge – from voluntary mergers, to a phased approach with early adopters merging first and then followed by others, to a comprehensive merger programme.

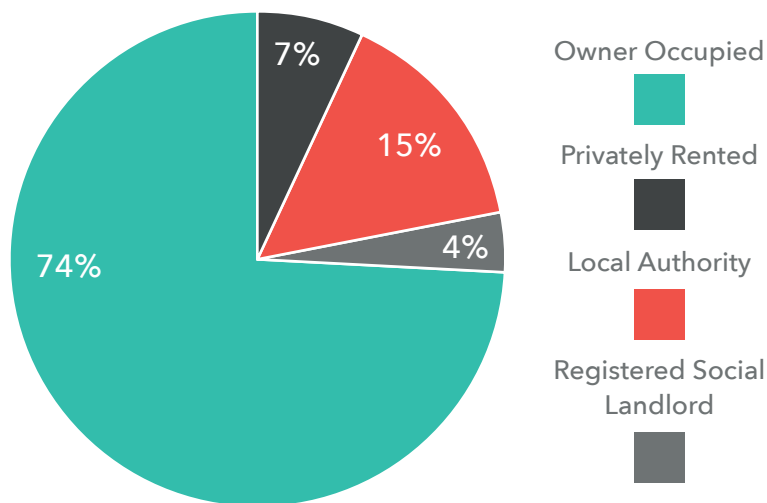
Recognising the desire of the Welsh Government to be informed by people with the most relevant experience, we launched a short survey to understand the experiences and views of housing professionals working within local authorities towards the proposed mergers. The purpose of this report is to provide a sense of how the proposed form of local government could impact the delivery of housing functions. Through this report, we wish to highlight the impact, both positive and negative. The findings demonstrate the range of opinions held about the reforms, from those who feel very strongly that they will have a negative impact on the services they deliver to those who feel the transformation is needed.

## 2. The housing picture in Wales

The housing functions delivered by local authorities differ greatly depending on how services are structured by individual authorities and if an authority has transferred its stock, or not. By 'housing functions' we are referring to the range of activities local authorities undertakes to meet housing need - including preventing homelessness, housing management, stock improvement, managing empty homes and providing adaptations.

The state of housing tenure in Wales has changed significantly in the last couple of decades:

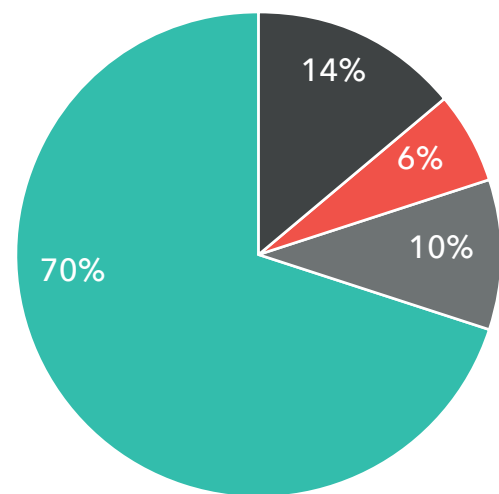
<sup>1</sup> Wales 2000-1



In the time period 2000/01 – 2016/17 the number of homes managed by local authorities has reduced from 15% of dwellings to 6% currently. This reduction is due in part to those authorities who transferred their stock wholesale via a large scale voluntary transfer arrangement and the sale of local authority homes. The period has also seen significant growth in the housing association and private rented sectors.

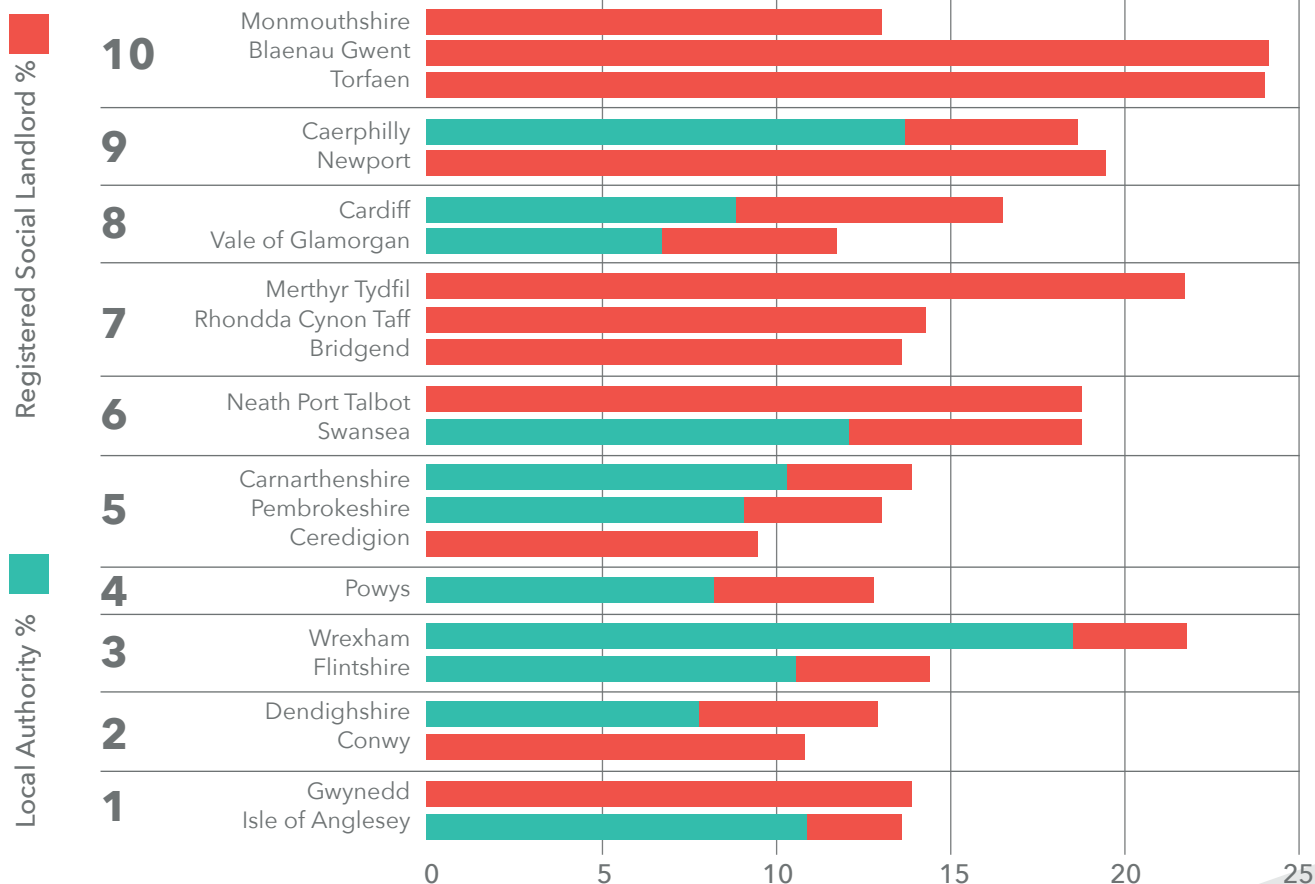
Over this time ten local authorities have transferred control of their housing stock through a large-scale voluntary transfer.

<sup>1</sup> Wales 2016-17



This has resulted in a number of housing associations being formed to manage what was previously stock managed by a local authority. The following table reflects the current composition of housing stock between housing associations and local authorities across Wales according to the proposed regional areas set-out in the Green Paper.

<sup>1</sup> Stats Wales - <https://statswales.gov.wales/Catalogue/Housing/Dwelling-Stock-Estimates/dwellingstockestimates-by-local-authority-tenure> - Accessed 01/06/2018



## Building new homes

The Welsh Government commitment to building 20,000 affordable homes by 2020 signified a policy-shift with the announcement that local authorities could build new homes once again. For local authorities the focus on continuing to re-invigorate their housing development function is entering a critical period:

“The ‘housing supply pact’ signed in 2016 commits associations to delivering 12,500 of the five-year target, with councils contributing 1,000 units. While the associations are close to achieving this, local authorities will need to double their output (they built just 121 new homes in 2016/17).”

(UK Housing Review, Chartered Institute of Housing, 2017)

As the picture of housing continues to change in Wales, the proposals put forward to reform local government could have a considerable impact on how local authorities play their part.

The following sections consider the findings of our survey of local authority housing professionals where we consider in detail the opportunities and challenges posed by the merger agenda.

## 3. Our research

### Who did we speak to?

We surveyed staff from all 22 local authorities using contact details we held and social media to promote the survey.

We received 31 responses, from 16 different areas of Wales. All responses were anonymised to ensure that staff felt confident to share their views. We asked people about their role and respondents held a range of roles

in their organisations; including Tenant Liaison, Housing Officers and Managers, Heads of Services, Planning and Services and Commissioning.

We are really grateful to those who gave their time to complete the survey. The submissions were so rich in detail that we have included quotes throughout this report to ensure we are being led by the views of respondents.

## 4. Findings of our survey

### Learning from experience

Recognising the importance of learning from experience, we asked people if they had experience of merging services before, 65% of respondents replied they had no experience of this. Those who had told us about:

- Positive experiences of services merging which had resulted in more streamlined services between contracted services and staff experiencing less travelling time.
- Some larger mergers had been managed poorly, with long delays before they were able to deliver services in a meaningful manner
- A perceived sense of loss amongst some elected officials who then demonstrated a reluctance to engage in the process
- A sense that there was not enough preparatory work done beforehand to prepare staff and councillors for the change. Also that major decisions about the final structures were taken at the last minute.

One respondent highlighted:

**“ There should have been more done with councillors to stop them fighting over decisions not in their remit. Their fighting overshadowed what could have been a positive process. If the political process had been better, officers would have handled the change better. ”**

## Fewer, larger authorities - what would work well?

We then asked respondents what they thought would be the positive impact of creating fewer, larger authorities. Less than a third (8 out of 30) could not identify a positive impact.

The rest of the respondents identified the following positive implications of proposed mergers.

### More resources

A number of respondents identified that merging would offer opportunities for capacity within their own department to be increased, highlighting that this would have better outcomes for tenants and communities.

Respondents told us that the pooling of financial and staff resources would facilitate greater opportunities to learn from best practice about what works. This included opportunities to realise savings through procurement and economies of scale in addition to access to skilled-trade staff to both build new homes and maintain existing properties.

**“ less discrepancy in services for the public, more joined up working, better overview ”**

**“ share roles and research rather than reinventing the wheel ”**

**“ been talked about for a long time, needs to happen ”**

## Collaboration

Some respondents highlighted that for tenants, aside from the potential increase in the quality of service received there would be potentially a wider range of properties to access:

**“ develop work around the private rented sector covering access to PRS accommodation...bringing empty homes back into use ”**

Several respondents focused on the loss of knowledge and expertise in some local authorities that resulted from Large Scale Voluntary Transfer arrangements. The proposed reform would lead to 5 mergers between authorities who had retained stock and those who had transferred their stock. Respondents told us that they hoped this would lead to better resourced and experienced housing departments.

**“ merge with a stock-retained Council where the strategic housing function is far better resourced ”**

Respondents recognised the need for greater collaboration between authorities and the benefits of combining resources and knowledge. They suggested the public, and in particular, tenants would welcome a greater regional picture of available housing stock (and opportunities for including stock from the private sector and bringing empty homes back into use).



## Fewer, larger authorities - what might not work?

### Keeping it local

Respondents identified a range of concerns about the proposed merger programme. Over 50% highlighted concerns about losing touch with local needs and accountability.

**“ tenants would lose their point of contact with whom they trust and have a relationship with ”**

**“ danger that the new LAs fail to connect with certain parts of the community by losing the knowledge of the local area and its intricacies ”**

An example was given of an authority who had invested in homelessness prevention services fearing that merging with other areas would lead to their services being dominated by other priorities.

**“ authority with only retained stock I'm concerned this would become diluted and lose focus ”**

### Getting it right

Some highlighted the difficulty of integrating with other authorities (including those who do not hold stock). Alongside the practical difficulties of merging services such as data-sharing and technology, respondents also identified the very different cultures between local authorities.

**“ concern re LA getting consumed by larger, neighbouring authorities ”**

**“ demographics of different authority areas are very different ”**

**“ difficult to integrate with another authority that does not hold stock ”**

Respondents told us that they were worried about job-losses, policy-drift and policies and strategies having to be newly written to reflect new areas. There were also concerns about loss of Welsh Government revenue and capital grant allocations and the impact on Welsh language in areas where services are delivered predominately in Welsh.

**“ biggest concern is the time lost resolving issues, such as policies and strategies that will now need to be combined across wider, more diverse areas ”**

**“ requirement to work regionally is actually stopping some modernisation from going ahead as consensus is not possible ”**

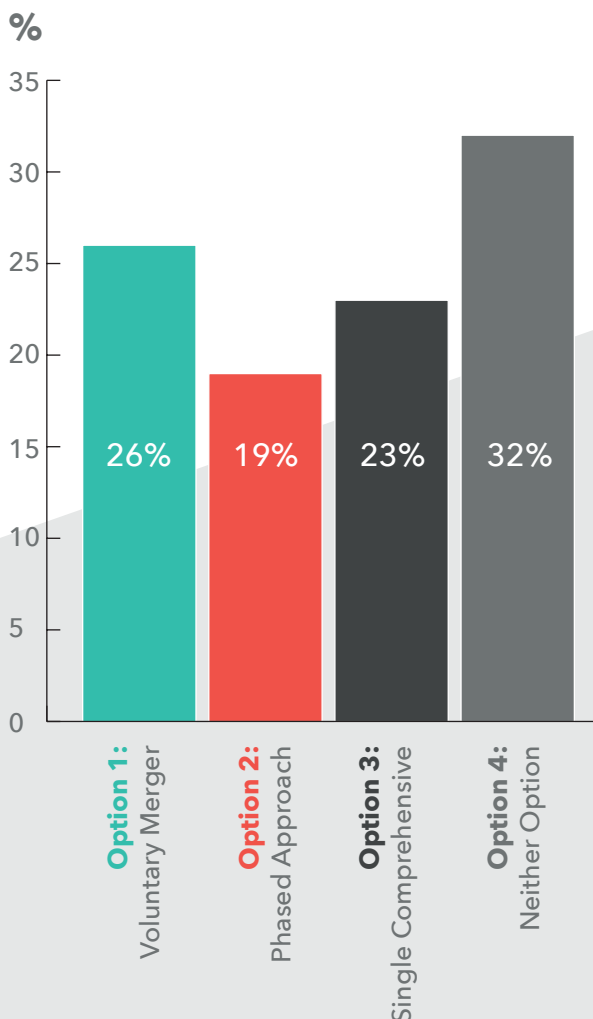
## Communicating change

Some respondents told us that they were wary of the merger agenda as they were unsure what it would signify in their area

*“it's happened so many times historically, there needs to be demonstrable positives as to why it will work this time”*

## Views on the merger options

Which option would be the most appropriate for the housing function in your area?



We gave respondents 4 options as according to the Welsh Government consultation.

### Option 1.

**26%** chose **voluntary merger**, respondents citing that “forced merger would make working relationships very difficult”,

### Option 2.

**19%** favoured a **phased approach**, highlighting that this “would allow better planning and consultation”

### Option 3.

**23%** preferred a **single comprehensive transfer programme**, describing their concerns that going down the voluntary route would lead to senior staff dragging their feet

### Option 4.

the highest number of respondent (**32%**) selected that their preferred option would be **no merger** “a merger offers nothing but loss”.

Some respondents welcomed the suggestions of greater merger and collaboration, but were not in agreement with the proposed regional areas.

*“there is a real opportunity to think afresh and reinvigorate a function is suffering from a lack of capacity and under-funding”*

*“merger of services within a local authority can be much more productive than mergers between authorities”*

## 5. What do you think would improve the housing function in your local authority?

The responses to this question demonstrate that housing professionals working within local authorities have lots of ideas about what could be done better. Respondents highlighted a number of opportunities including:

- General call for better resources, more staff, higher wages
- Better working in collaboration with housing associations, private rented sector and health colleagues
- IT developments such as an 'app' for tenants to report repairs and make payments on rent
- Opportunity to work with elected officials with no experience of housing to improve their knowledge
- A more integrated approach between housing, social services, job centre/DWP and health to support people to remain/become independent and sustain their tenancy
- Reduce bureaucracy around certain functions. More flexibility to concentrate on what matters and what makes a difference
- Improved staff engagement to challenge some of the top-down culture in some local authorities

## 6. Recommendations

- 1** Local authorities should review with urgency their internal communications on potential mergers and the opportunities for staff to feed-in their expertise. This should be done at an early stage and arrangements put in place to ensure opportunities are ongoing and the quality of communication remains high.
- 2** The Welsh Government must ensure that merger discussion and progression do not have any unintended consequences for local authorities to deliver towards the 20,000 affordable homes target.
- 3** The Cabinet Secretary for Local Government and the Minister for Housing and Regeneration should convene a joint meeting with representatives from local authority housing departments to facilitate an open discussion about the proposed changes and explore how local authorities can be further supported in meeting Wales's housing need.
- 4** Assembly members and local authority councillors should engage proactively with housing departments to gain insight into the impact of proposals, both positive and negative.
- 5** The Welsh Government should consider undertaking a comprehensive analysis of the impact merger could have on delivering housing functions where the areas merging are a mix of those who still develop and manage homes, and those who do not.
- 6** The voice of tenants should be at the heart of any proposed, large-scale change to how their services are delivered. The Welsh Government must offer further support to local authorities in engaging tenants at an early stage to ensure their voice is visible in considering changes which could substantially impact the housing services they receive.





Chartered  
Institute of  
Housing  
Cymru

## Meet the Team:



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Tyfu Tai Cymru –  
Because Housing Matters



**GIG**  
CYMRU  
**NHS**  
WALES

Bwrdd Iechyd Prifysgol  
Cwm Taf  
University Health Board

Your ref/eich cyf:  
Our ref/ein cyf:  
Date/Dyddiad:  
Tel/ffôn:  
Fax/ffacs:  
Email/ebost:  
Dept/adran:

ML/TLT  
31 May 2018  
01443 744803  
01443 744800  
Marcus.Longley@wales.nhs.uk  
Chair & Chief Executive

- 4 JUN 2018

RECEIVED

Strengthening Local Government  
Welsh Government  
Cathays Park  
Cardiff  
CF10 3NQ

(By email : [StrengtheningLocalGov@gov.wales](mailto:StrengtheningLocalGov@gov.wales))

Dear Sir/Madam

**Green Paper Consultation on Strengthening Local Government –  
Delivering for People**

We welcome the opportunity to comment on the ambitions for local government and the options which could lead to larger and more sustainable local authorities to deliver effective and sustainable public services.

We would like to reinforce the need to maintain co-terminosity between Local Authorities and Health Boards and that any changes that would mean moving away from that would be a retrograde step in terms of the alignment of health and social care.

We would like to underline the benefits of moving to a single Public Service Board on a Health Board footprint and would encourage any opportunity to include this as a formal proposition aligned to any Local Authority boundary change. We believe a key criterion for the consultation could be in relation to 'what would facilitate such a change'?

In line with the information within the Parliamentary Review there is also a need to rationalise collaborative / joint working mechanisms to further facilitate closer working beyond organisational change.

Thank you,

Yours sincerely

**Professor Marcus Longley**  
**Chair/Cadeirydd**

**Return Address: Ynysmeurig House, Unit 3, Navigation Park, Abercynon, CF45 4SN**

Dear Cabinet Secretary for Local Government and Public Services

I write to you attaching UNISON Cymru/Wales' response to Welsh Government's Green Paper on Strengthening Local Government and Delivering for People.

UNISON Cymru/Wales is Wales' largest public sector trade union. UNISON has 100,000 members working in public services across Wales. We welcome the opportunity to feed into Welsh Government's Green Paper.

We represent full-time and part-time staff who provide public services, although they may be employed in both the public and private sectors. More than two thirds of our members are women and our members work at every level in public services. In local government this includes people working for local councils, schools, libraries, social care and private companies. This consultation will affect our members in other sectors and their families as a citizenship issue; they too want efficient and effective local public services.

UNISON Cymru/Wales has an overarching strategy and vision for how local government should look in the future. For this reason, we have chosen to respond to this consultation with our strategy paper 'Local Government – Moving Forward', in place of answering the questions set out in the consultation document.

UNISON Cymru/Wales is disappointed with the level of detail and analysis contained in the EIA that accompanied the Green Paper. The Equality Impact Assessment (EIA) fails to acknowledge that the majority of the workforce within Local Government is female and as a result any changes to Local Government could have a disproportionate impact on women. There is a distinct lack of disaggregated data within the EIA to support the conclusions made within the EIA.

For example, on one hand the EIA acknowledges that the age and current equality profile of elected representatives and senior Officers in Local Government does not reflect the communities that they serve, yet there is no analysis within the Assessment of the impact of the changes for the current elected representatives who are predominately male. Any effective EIA would identify this disproportionate impact on men and explain why it was felt that the policy should continue. Further, the Equality and Human Rights Commission Assessing Impact and the Equality Duty – A guide for Listed Public Authorities in Wales (the Guidance) states that where there is a disproportionate impact

“Steps may be needed to counter any resentment or perception of more favourable treatment among other communities and groups. This would be an important consideration in terms of the ‘good relations’ element of the general duty”

There appear to be no steps within the EIA to address this potential issue and as such the “good relations” element of the general duty is not addressed in this regard.

The EIA identifies that none of the proposals relate only to people with disabilities and no negative impacts on people with disabilities have been identified. Yet the EIA does not consider the potential impact of reform on the service users within Local

Authorities, a number of whom will have a disability. Again it is the lack of disaggregated data supporting the assumptions within the EIA that is concerning.

The EIA appears to be a narrative of the Welsh Government's intent for Local Government Reform rather than the detailed analysis of the proposals to assist in the decision making process.

It is also disappointing to note that the basics within the EIA have not been completed; the appropriate phrase has not even been deleted within the declaration by the Official completing the EIA:

#### **4. Declaration**

**\*Please delete as appropriate:**

**The policy \*does / does not have a significant impact upon equality issues**

UNISON Cymru/Wales hopes that Welsh Government will take our members' views on the green paper and the EIA into account when deciding on the future steps necessary to strengthen local government and delivering for people.

I would be very grateful for acknowledgment of receipt of this response

Kind regards

Bethan Thomas

#### **Bethan Thomas**

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Pennaeth Llywodraeth Leol - Head of Local Government  
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Custom House Street  
Cardiff  
CF10 1AP



# Local Government Moving Forward



**UNISON Cymru/Wales supports a vibrant and diverse public sector delivering services for the benefit of the people of Wales. It considers that the purpose of Local Government is to provide a vehicle for local service delivery providing community support and shaping how communities look and live in Wales. Local Government has a role to play in providing a democratic voice for the community which then informs its work to meet the general health and wellbeing needs of the communities that it serves, which are often diverse and complex. It provides a level of local accountability that is necessary to ensure that every citizen of Wales has the ability to exercise the rights and responsibilities associated with being a citizen and to hold those elected to public service at a local level to account for the decisions that are made.**

Local Government is a complex democratic and operational structure that offers many advantages such as finding solutions for localised challenges and encouraging local leadership. As a large local employer it is responsible for providing essential services especially to the most vulnerable in our communities such as young and older people which includes all statutory functions legislated by the Welsh Government. Also Local Government provides frontline services such as waste and recycling, planning and environmental health, youth services, education, regeneration, community services etc.

Local Government should also be at the forefront of providing viable opportunities for young people and should act as a stimulus for business growth and jobs whilst providing affordable and good quality homes within the community. This will include meeting the aspirations of the Welsh Government in reducing the number of young

people not in education, employment or training and tackling poverty.

It is within this context and vision for Local Government that UNISON Cymru/Wales responds to Welsh Government consultations concerning Local Government in Wales. The overall purpose of Local Government should not be lost in the debate or decisions regarding reform and reorganisation as this is essential to underpinning a sustainable and vibrant Local Government sector that can adapt to any changing political or social environment.

UNISON Cymru/Wales has long advocated that the number of Local Authorities in Wales is not sustainable and does not provide the stability and sustainability that the people of Wales expect or require for the continued provision of effective public services.

Any reform process should be guided by the need to reform local government and not used as a vehicle for delivering conservative imposed austerity on the citizens in Wales. Recognising the Welsh Government's commitment to partnership working with the Trade Union movement in Wales, reform should not be used as a mechanism to dilute the ability of Unions to represent their members and as a result time and resources provided to Unions to undertake this work, which is vital, should not suffer a detriment as a result of any reform proposals and/or changes to structures.

UNISON Cymru/Wales considers that it is naive to exclude any discussions regarding reforming Local Government funding from the consultation process. The continued sustainability of the Local Government sector, is underpinned by the need for adequate and appropriate funding for the delivery of local services by Local Authorities, from the Welsh Government.

# Local Government Moving Forward

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UNISON Cymru/Wales recognises that the political and social landscape of Wales has evolved since the Williams Commission published its findings in 2014. UNISON Cymru/Wales' position however remains that Local Government reform and reorganisation is not just desirable but essential to delivering a coherent, sustainable and fully funded public service in local communities.

UNISON Cymru/Wales therefore supports a reform of Local Authorities, including the use of mergers within the boundaries of existing Health Boards. This support for any reform and reorganisation of Local Government in Wales is on the proviso that any proposals are fully funded by the Welsh Government and accompanied by a commitment to no compulsory redundancies as a result of reform. The Welsh Government should also make available a package of support for Local Government to support change including funding to support an all Wales voluntary severance scheme. UNISON Cymru/Wales would expect the parties in the merger process to undertake a comprehensive audit of roles required within any new structures which would provide the framework for any national severance scheme.

It is considered that the adoption of all Wales pay scales and job evaluation scheme for Local Government would be of benefit to the continued sustainability of the Local Government Sector, reducing unnecessary competition and ensuring a necessary level of pay transparency across Wales. Consideration should be given by Welsh Government to make the introduction of an all Wales pay scale and job evaluation scheme a condition of reform. Further exploration is required to determine whether Chief Officers could also be part of this process within the proposals for Local Government reform and whether the establishment of an NJC for Wales would deliver more effective outcomes for Local Government in Wales.

UNISON Cymru/Wales considers that any new Local Authority in Wales should commit to signing up to the UNISON Apprentice, Ethical & Residential Care Charters and Respect your Youth! A Charter for Young Workers in Wales. All of these Charters seek to ensure that the fair employment of workers

in Wales and ensuring that some of the most vulnerable workers gain valuable employment protections. A commitment should be made to reviewing practice of employing school support staff on term time only contracts along with a national structure for school support staff in Wales. Further, any new Local Authority in Wales should automatically become a Living Wage Employer supporting the Welsh Government's commitment to social justice and ending poverty in Wales.

UNISON Cymru/Wales strongly believes that public services should be delivered by the public sector and as a result strongly opposes outsourcing. UNISON Cymru/Wales believes that the Code of Practice on Ethical Employment in Supply Chains should be binding on Local Authorities and that non compliance with this code, and associated procurement legislation, should result in an appropriate financial sanction so as to deter non-compliance.

Any reform proposals must also be supported by a funding framework which ensures an appropriate level of funding moving forward for Local Government to ensure the continued sustainability of the sector.



# Local Government Moving Forward

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UNISON Cymru/Wales acknowledges that Local Government requires additional powers to enable it to respond to the challenges of the 21st Century and beyond. For this reason UNISON Cymru/Wales supports the introduction of the general power of competency for Local Authorities that engage in the reform agenda. Further, Local Authorities should be able to lend and borrow money on a professional basis with the offer of preferential interest rates from the Welsh Government. Such an approach could be used to support the development of Small and Medium Enterprises within Local Communities. UNISON Cymru/Wales believes that Local Government reform provides an opportunity for the Welsh Government to legislate in support of the concept of one public sector and providing a framework to enable a mobility of the Local Government workforce to support this.

UNISON Cymru/Wales would not wish to see any changes introduced in relation to non-domestic rates in Wales and would oppose any moves to impinge the re-distribution across Wales of revenue from these rates.

It is understood that recently steps have been taken to provide more stability for Local Authorities by providing a two year funding settlement. UNISON Cymru/Wales would advocate a system of funding that provides some certainty and stability for a period of between three and five years, which would allow for effective and efficient long and short term financial planning. UNISON Cymru/Wales believes that the Welsh Government should explore whether it would be possible to introduce some flexibility to the requirements around budget setting for Local Authorities allowing for the setting of deficit budgets for specific projects that would have a long term benefit to Local Authorities and the communities they serve. With appropriate financial monitoring measures in place, such as the requirement to return to a break even budget for the next round of local elections UNISON Cymru/Wales believes this would enable Local Authorities to adapt more effectively to challenge and change within the sector.

So as to ensure that Local Authorities enter into any proposed merger and/or reform process in an optimum financial position, UNISON Cymru/Wales would suggest that the Welsh Government considers some interim guidance or direction on the spending of reserves. UNISON Cymru/Wales would not like to revisit the situation that arose in 1996 where some Local Authorities sought to deplete reserves and resources prior to any mergers taking place.

What is essential to the reform agenda moving forward is that Welsh Government shows the necessary leadership to bring about change and demonstrates to the political leadership in Local Government the business case to support the reform agenda.

UNISON Cymru/Wales believes that the practicalities regarding the reform of Local Government should be led by those with a leadership role within Local Government, for example, Senior Management Teams, Chief Executives and Council Leaders in conjunction with the recognised trade unions as without this political buy in any proposals to reform Local Government will face challenges that will delay and disrupt the reform agenda. This work should be framed by a clear direction communicated by Welsh Government as the body responsible for funding Local Government.

Decision making and accountability at a local level is a foundation of Local Government and therefore steps should be taken to ensure that this principle is maintained through any reform process and that any advice provided on the process also has a local footing. UNISON Cymru/Wales would not support the use of Consultants to manage any change process as it considers the necessary skills and experience to bring about change can be found within the current workforce.



# Local Government Moving Forward



However, should it not be possible to encourage political leaders in Local Government to engage in the reform agenda, it is the responsibility of the Welsh Government to show leadership and take decisive action to ensure the future sustainability and effectiveness of Local Government in Wales.

Fair representation and proportionality are the key principles underpinning representation within UNISON Cymru/Wales and we strongly believe that in order for to ensure that the democratic structures within Local Authorities are representative of the communities that they serve intervention by way of legislation is required. The Welsh Government may wish to consider legislating to ensure that wards have a gender balance of elected representatives and consideration of positive action to encourage citizens with protected characteristics to commit to public service.

The Welsh Government should review the remuneration of Councillors, the current allowance system has ensured council chambers across the country are not representative of their communities

which includes a third being young people. The number of days needed to attend council meetings and undertake council duties should be extended with companies/organisations being compensated for supporting their staff to carry out this important community function. Local Authorities should also look at the availability of crèche and childcare facilities to encourage those with caring responsibilities to engage in and contribute to public life.

UNISON Cymru/Wales notes that the Scottish Parliament operates the only facility of its type in Europe, providing supervision for children of people visiting the Scottish Parliament. The Scottish Parliament provides childcare for individuals participating in a guided tour, meeting an MSP or member of staff, taking part in Parliament's business meetings, watching parliamentary business live in the Chamber of committee rooms, attending an event, browsing and having coffee in the café. Such an approach strives to create an open and accessible democratic structure. UNISON Cymru/Wales feels that such an approach should be considered at a local and national level in Wales.

UNISON Cymru/Wales considers that in order to make democratic structures representative within Local Government a body of work needs to be undertaken to ensure that the purpose, structure and powers of Local Government are truly understood by the communities they serve. UNISON Cymru/Wales believes that this education should start at a schools level within PSE Active Citizenship. UNISON Cymru/Wales believes that trade unions, such as UNISON Cymru/Wales, have a role to play in the shaping the curriculum in this regard and the promotion of a social contract between citizens, communities, local and national governments.

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Annex C: Cwestiynau Ymgynghori

Enw	Rebecca Williams, Swyddog Polisi
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Mae'r hysbysiad preifatrwydd yn [y ddogfen ymgynghori](#) yn esbonio sut byddwn yn defnyddio eich gwybodaeth.

**Pennod 3**

**Cwestiwn Ymgynghori 1**

Ym Mhennod 2, dywedom unwaith eto ein bod wedi ymrwymo i weithio'n rhanbarthol mewn meysydd allweddol, gan gydnabod hefyd fod angen gwneud newidiadau pellach i gefnogi hyn. Ym Mhennod 3, rydym yn cyflwyno'r opsiynau cyffredinol ar gyfer symud tuag at lai o awdurdodau, a'r rheini'n rhai mwy o faint, ac rydym yn crynhoi nodweddion y broses a fyddai'n gyffredin i bob opsiwn.

- a) Pa gamau ymarferol allai Llywodraeth Cymru eu cymryd i wneud y trefniadau gweithio'n rhanbarthol presennol yn haws ac yn fwy effeithiol, er enghraifft mewn perthynas â'r consortia addysg, gwasanaethau cymdeithasol a'r Dinas-ranbarthau a'r Bargeinion Dinas a Thwf?

**Mae nifer o ffactorau sy'n peri pryder i UCAC o ran y system fel ag y mae ar hyn o bryd. Nid oes gennym safbwynt penodol ynghylch sut ac ar ba batrwm i ddiwygio strwythurau llywodraeth leol, ond amlinellwn ein pryderon gyda'r bwriad iddynt gael eu cymryd i ystyriaeth wrth i'r agenda ar gyfer cryfhau llywodraeth leol symud yn ei flaen:**

- **Cyd-ffinio**  
Mae'r ffaith nad yw awdurdodau lleol/consortia rhanbarthol yn cyd-ffinio gyda Byrddau Iechyd (yn arbennig) yn gallu creu dryswch a chymhlethdod. Mae hyn yn arbennig o wir mewn perthynas â disgyblion ag Anghenion Dysgu Ychwanegol, ac mae'r problemau hynny'n debygol o ddwysáu wrth i ofynion y Ddeddf Anghenion Dysgu Ychwanegol a'r Tribiwnlys Addysg 2018 gael eu gweithredu dros y blynyddoedd i ddod.
- **Adnoddau dynol**  
Yn sgil pwysau cyllidebol ar Awdurdodau Lleol, rydym wedi gweld dirywiad sylweddol dros y blynyddoedd diwethaf o ran safon y ddarpariaeth arbenigol mewn perthynas ag adnoddau dynol addysg. Mae hyn yn digwydd oherwydd prinder staff adnoddau dynol yn gyffredinol a gormodedd o lwyth gwaith ar y rhai sy'n weddill. Yn ogystal mae cynnydd yn y ddibyniaeth ar staff adnoddau dynol 'corfforaethol', nad oes ganddynt y lefelau priodol o arbenigedd ym maes addysg. Gall hyn achosi problemau gwirioneddol o ran diffyg cyngor prydlon i ysgolion neu gyngor amhriodol, sydd yn ei dro yn gallu arwain at brosesau llawer fwy hirfaith neu gwbl ddianghenraid, sydd - yn eironig - yn mynd â llawer fwy o amser ac egni nag oedd ei hangen.
- **Consortia addysg rhanbarthol**  
Mae angen i'r cydbwysedd o ran cyfrifoldebau rhwng yr awdurdodau

<p><b>lleol a'r consortia rhanbarthol fod yn gliriach. Rhaid cofio mai awdurdodau lleol sy'n dala'r grym, ac yn dirprwyo dyletswyddau (yn ogystal â grym a chyllid) i'r consortia rhanbarthol mewn meysydd penodol at ddibenion penodol iawn. Mi ddylai'r llinellau atebolrwydd fod yn gwbl glir, gyda'r consortia'n atebol i'r grwpiau o awdurdodau lleol ar y cyd.</b></p> <p><b>Mae materion cyflogaeth cymhleth yn codi yn y maes hwn yn ogystal, ac mi fyddai UCAC yn ffafrio gweld cymaint â phosib o swyddi'r gweithlu addysg yn dod dan adain yr awdurdodau lleol er mwyn sicrhau telerau ac amodau gwaith clir a chytunedig (a statudol). Mae hyn yn wir am ymgynghorwyr (rhanbarthol), am athrawon cyflenwi, a staff arbenigol eraill.</b></p> <p><b>Elfen arall o'r gydberthynas gyda'r consortia rhanbarthol yw'r lefelau o gyllideb a ddirprwyir iddynt oddi wrth awdurdodau lleol. Petai llywodraeth leol yn cael ei ad-drefnu, mi fyddai'n cynnig cyfle i ailedrych ar y trefniadau cyllidebol, a sicrhau'r gwerth gorau am arian yn ogystal â'r atebolrwydd cryfaf.</b></p> <ul style="list-style-type: none"> <li>• <b><u>Cefnogaeth i lywodraethwyr</u></b> Ers i'r corff Llywodraethwyr Cymru ddod i ben yn ddiweddar, mae bwlch anferth o ran cefnogaeth i gyrff llywodraethol ysgolion. Mae llywodraethwyr yn bobl lleyg sy'n ysgwyddo cyfrifoldebau eithriadol o drwm, arbenigol ac amrywiol (e.e. amddiffyn plant, iechyd a diogelwch, prosesau cyflogaeth). Byddai parhau i adael iddynt weithredu heb gefnogaeth briodol yn anghyfrifol a hyd yn oed yn beryglus o ran y risgiau o gamweinyddu. Byddai unrhyw newidiadau i strwythurau llywodraeth leol yn cynnig cyfle i fynd i'r afael â hyn.</li> </ul>	<p>b) Beth yw eich barn chi am yr elfennau cyffredin i'r prosesau uno yr ydym yn eu cyflwyno yn yr adran hon?</p>
	<p>c) Beth yw eich barn chi am yr opsiynau a gyflwynwyd gennym ar gyfer creu llai o awdurdodau, a'r rheini'n rhai mwy o faint?</p>
	<p>d) A oes unrhyw opsiynau eraill y dylem eu hystyried ar gyfer creu llai o awdurdodau, sy'n fwy o faint?</p>
	<p>e) A oes gennych dystiolaeth ynglŷn â chost, manteision ac arbedion pob opsiwn a allai helpu i lywio'r penderfyniad? Os oes, rhwch fanylion.</p>

<p><b>Pennod 4</b></p>
<p><b><u>Cwestiwn Ymgynghori 2</u></b> Mae pennod 4 wedi egluro'r angen am eglurder ar y patrwm ar gyfer llywodraeth leol yn y dyfodol a'r ystod o ffactorau y dylid ei hystyried wrth benderfynu ar ffurf newydd. Mae'n cynnig patrwm posibl ar gyfer llywodraeth leol yn y dyfodol, y gellid ei gyflawni drwy bob un o'r opsiynau a drafodwyd yn y bennod flaenorol.</p>
<p>a) Ydych chi'n cytuno ei bod hi'n bwysig rhoi eglurder ynghylch y patrwm ar gyfer llywodraeth leol y dyfodol?</p>

b) Ydych chi'n cytuno â'r ffactorau a nodwyd gennym i lywio ein syniadau? A fydddech chi'n ychwanegu ffactorau eraill neu'n newid unrhyw ffactor?
<p><b>Cytunwn yn gryf â'r angen i ystyried ffiniau gwasanaethau cyhoeddus eraill, ac yn arbennig felly Byrddau Iechyd Lleol (esboniwyd y rhesymau yng nghwestiwn 1 uchod).</b></p> <p><b>Ffactor arall y dylid ei ystyried yw diwylliant ieithyddol. Mae consortiwm rhanbarthol ERW, sy'n cwmpasu ardaloedd traddodiadol Gymraeg y gorllewin gydag ardaloedd ble mae llai o arfer o ddefnyddio'r iaith wedi golygu bod prosesau gweinyddol, cyfarfodydd a dogfennaeth wedi troi i raddau helaeth iawn i'r Saesneg trwy 'default'. Mae hyn yn gam peryglus yn enwedig yn ystod y cyfnod o geisio creu miliwn o siaradwyr erbyn 2050. Cymreigio yw'r nôd, nid Seisnigeiddio trwy'r drws cefn. Pwyswn ar Lywodraeth Cymru i sicrhau bod hyn yn ystyriaeth ganolog wrth fynd ati i gryfhau llywodraeth leol.</b></p>
c) Beth yw eich barn chi am yr ardaloedd newydd a awgrymir yn yr adran hon
d) A oes gennych unrhyw awgrymiadau eraill ac, os felly, pa wybodaeth sydd gennych i gefnogi'r rhain fel dewis arall?
e) Oes yna unrhyw ddulliau eraill y dylem eu defnyddio i symleiddio trefniadau cydweithio ar lefel ranbarthol a rhwng cyrff cyhoeddus â'i gilydd yn yr ardaloedd awdurdod newydd? Os oes, beth ydyn nhw?

<b>Pennod 5</b>
<p><u>Cwestiwn Ymgynghori 3</u></p> <p>Mae'r pennod hon yn trafod y dull arfaethedig ar gyfer trawsnewid a'r goblygiadau ar gyfer sefydlu Pwyllgorau Pontio ac etholiadau i'r Awdurdodau Cysgodol o dan bob opsiwn.</p>
a) Ydych chi'n cytuno â'r broses bontio arfaethedig: sef sefydlu Pwyllgorau Pontio a sicrhau bod etholiadau i Awdurdodau Cysgodol yn gallu cael eu cynnal cyn y diwrnod breinio ar gyfer yr awdurdodau newydd?
b) Ydych chi'n cytuno, pe byddai opsiwn 1 yn cael ei ddilyn, y dylem bennu dyddiad terfynol ar gyfer cyflwyno cynigion ar gyfer uno gwirfoddol ym mhob cylch etholiadol?
c) A oes gennych unrhyw sylwadau eraill ar y map arfaethedig?
<p><u>Cwestiwn Ymgynghori 4</u></p> <p>Mae'r ymgynghoriad yn awgrymu cynnal unrhyw etholiadau llywodraeth leol ym mis Mehefin 2021.</p> <p>A oes unrhyw reswm pam na fyddai mis Mehefin 2021 yn ddyddiad addas? Os felly, awgrymwch ddyddiad arall gan nodi'r rhesymau pam y byddai'r dyddiad hwnnw yn fwy addas..</p>
<u>Cwestiwn Ymgynghori 5</u>

Mae Llywodraeth Cymru yn cydnabod bod rhai cynlluniau neu asesiadau sy'n gysylltiedig â chylchoedd etholiadol, er enghraifft asesiadau llesiant a baratoir gan Fyrddau Gwasanaethau Cyhoeddus. Byddwn yn gwneud darpariaeth i sicrhau bod y rhain yn cyd-fynd ag unrhyw gylchoedd etholiadol newydd yn y dyfodol. A oes unrhyw gynlluniau neu faterion eraill a allai fod ynghlwm wrth y cylch etholiadol y mae angen inni eu hystyried?

**Cwestiwn Ymgynghori 6**

Beth yw eich barn am y dull y dylid ei ddilyn i benderfynu ar derfynau'r adolygiadau etholiadol?

**Pennod 6**

**Cwestiwn Ymgynghori 7**

- a) Sut gall cynghorau ddefnyddio gwybodaeth eu haelodau etholedig am eu cymunedau, a'u cysylltiadau ynddynt, yn fwy effeithiol?
- b) Sut y gallwn gydnabod yn well lefel y cyfrifoldeb o fod yn gynghorydd lleol? Pa newidiadau i'r gydnabyddiaeth ariannol a'r gefnogaeth mae cynghorwyr yn eu cael fyddai'n galluogi ystod ehangach o bobl i fod yn rhan o'r gynrychiolaeth ddemocrataidd leol?

**Cwestiwn Ymgynghori 8**

- a) A oes unrhyw bwerau eraill y dylid eu rhoi i lywodraeth leol? Os oes, beth ydyn nhw?
- b) A oes rhyddid neu hyblygrwydd eraill y dylid eu rhoi i lywodraeth leol? Os oes, beth ydyn nhw?

**Cwestiwn Ymgynghori 9**

- a) Pa feysydd sy'n cynnig y cwmpas mwyaf i rannu gwasanaethau trafodiadol?
- **Adnoddau dynol addysg arbenigol**
  - **Cefnogaeth i lywodraethwyr**
  - **Systemau ar gyfer cyflogi a darparu athrawon cyflenwi i ysgolion**
- b) Beth yw'r ffordd orau o ddatblygu trefniadau o'r fath?

**Cwestiwn Ymgynghori 10**

- a) Er mwyn sicrhau ein bod yn datblygu dull cyson ar draws Cymru, lle bo cysondeb yn bwysig, sut ydych chi'n meddwl fyddai orau i ddarparu'r cyngor a'r cymorth ar y materion hyn?
- b) Oes unrhyw heriau neu gyfleoedd eraill yn deillio o newid strwythurol neu ddarparu pwerau a hyblygrwydd eraill nad ydynt wedi eu nodi uchod? Os oes angen cymorth ar y meysydd hyn, ym mha ffordd y dylid rhoi'r cymorth hwnnw?

**Awgryma UCAC y gellid ystyried, yn y cyd-destun hwn, y posibilrwydd o greu sefyllfa gliriach o ran cyflogaeth athrawon ysgol; ar hyn o bryd mae'r rhaniad**



<b>rhwng y corff llywodraethol a'r awdurdod lleol yn gallu peri aneglurder, dryswch a chamweinyddu. Yn ogystal, mae'r sefyllfa bresennol yn cyfyngu ar gyfleoedd ar gyfer adleoli pan fydd achosion o ddiswyddo neu ailstrwythuro.</b>
c) Pa un o'r materion a nodwyd uchod neu yn eich ymateb ddylai gael blaenoriaeth i'w ddatrys yn gynnar?
<u>Cwestiwn Ymgynghori 11.</u> Hoffem wybod eich barn am ba effeithiau y byddai'r cynigion yn yr ymgynghoriad hwn yn eu cael ar y Gymraeg, yn enwedig ar y cyfleoedd i bobl ddefnyddio'r iaith ac o ran peidio â'i thrin yn llai ffafriol na'r Saesneg.
a) Beth fyddai'r effeithiau yn eich barn chi?
<b>Yn sicr mae peryglon yma. Fel y dywedwyd uchod, rydym wedi gweld awdurdodau traddodiadol Gymraeg yn cael eu Seisnigeiddio'n sylweddol ac yn sydyn iawn yn sgil dod yn rhan o gonsortiw m rhanbarthol ehangach. Rhaid bod yn ymwybodol o'r peryglon real iawn hyn.</b>
b) Sut y byddai modd cynyddu'r effeithiau cadarnhaol, neu liniaru'r effeithiau negyddol?
<b>Wrth ystyried ail-drefnu mi fydd yn hollbwysig fod yn ymwybodol o'r diwylliannau ieithyddol yn yr ardaloedd awdurdod lleol y bwriedir eu huno, a sicrhau eu bod yn cyd-fynd â'i gilydd o safbwynt ieithyddol. Dylid sicrhau mai gweithdrefnau ieithyddol yr awdurdod lleol 'cryfaf' o safbwynt y Gymraeg sy'n goruchafu wrth uno, ac nad oes unrhyw symud am yn ôl, naill ai o safbwynt polisiâu swyddogol, nac o ran defnydd iaith 'default'.</b>
<u>Cwestiwn Ymgynghori 12</u> Eglurwch hefyd sut y credwch y byddai modd ffurfio neu newid (os bydd angen) y cynigion yn yr ymgynghoriad hwn er mwyn arwain at effeithiau cadarnhaol, neu fwy o effeithiau cadarnhaol, ar gyfleoedd i bobl ddefnyddio'r Gymraeg a pheidio â thrin y Gymraeg yn llai ffafriol na'r Saesneg, ac er mwyn peidio â chael effaith andwyol ar gyfleoedd i bobl ddefnyddio'r Gymraeg nac o ran trin y Gymraeg yn llai ffafriol na'r Saesneg.
<b>Dylid defnyddio'r cyfle i symud mwy o awdurdodau lleol i gyfeiriad defnyddio'r Gymraeg fel iaith weinyddol. Mi fyddai i hynny fanteision sylweddol iawn o ran blaenoriaethu polisi eraill Llywodraeth Cymru.</b>
<u>Cwestiwn Ymgynghori 13</u> Mae'r Asesiad o'r Effaith ar Hawliau Plant a gyhoeddir ochr yn ochr â'r ymgynghoriad yn amlinellu barn Llywodraeth Cymru am effaith y cynigion sydd wedi'u cynnwys yn yr ymgynghoriad ar blant a phobl ifanc. Mae Llywodraeth Cymru yn ceisio barn ar yr asesiad hwnnw.
a) A oes unrhyw effeithiau cadarnhaol neu andwyol sydd heb eu nodi yn yr asesiad?
b) A ellid ail-lunio'r cynigion er mwyn cynyddu'r effeithiau cadarnhaol neu leihau unrhyw effeithiau andwyol posibl?
<u>Cwestiwn Ymgynghori 14</u> Mae'r Asesiad o'r Effaith ar Gydraddoldeb a gyhoeddwyd ochr yn ochr â'r ymgynghoriad yn rhoi braslun o farn Llywodraeth Cymru ar effaith y cynigion sydd

wedi'u cynnwys yn yr ymgynghoriad ar grwpiau sy'n cael eu diogelu o dan Ddeddf Cydraddoldeb 2010. Mae Llywodraeth Cymru yn ceisio barn ar yr asesiad hwnnw.
a) A oes unrhyw effeithiau cadarnhaol neu andwyol eraill sydd heb eu nodi yn yr asesiad?
b) A ellid ail-lunio'r cynigion er mwyn cynyddu'r effeithiau cadarnhaol neu leihau unrhyw effeithiau andwyol posibl?
<u>Cwestiwn Ymgynghori 15</u>
Rhowch unrhyw sylwadau eraill sydd gennych ar gynnwys yr ymgynghoriad hwn.