

## 1. APPENDIX ONE: Consultation Questions

Your Name	Chris Burns, Interim Chief Executive
Organisation (if applicable)	Caerphilly County Borough Council
Email/ telephone	01443 864410
Your address	Penallta House Tredomen Park Ystrad Mynach Hengoed, CF82 7PG

### SECTION 2

Consultation Question 1. (Para 2.2.1):

The Welsh Government believes that it appropriate to consider 'tests' to frame thinking around regional working.

a) Do you think the 'tests' set out are helpful in guiding thinking?

A fundamental additional consideration is that each regional working arrangement is subject to a sound business case setting out demonstrable benefits to the residents of Caerphilly.

The first test whilst framed around the word 'resilience' is arguably about 'saving money' or a low cost solution. The first question could be 'what problem is this trying to solve?' which may provide a different test.

The questions around linkages with other service areas could be improved to ask whether there is linkage with other regional delivery. A consideration of best fit might avoid the potential for a situation where a local service were regionalised, but many delivery partners remained local.

Whilst the tests are useful, the following consultation question then moves into suggested areas of work to regionalise. It is assumed that this mean tests have been completed on these areas and it would be helpful to see the results of the assessment against the 'tests' to understand better how these areas were arrived at.

b) Are there other tests or considerations that might also be used?

A key test will be whether there will be demonstrable benefits to our communities. It may be useful to look at the function, service area, or activity from the perspective of the citizen; i.e. does it make sense to them to receive the service regionally. Caerphilly Council supports regional working, but only where there is a sound business case providing the assurance that it is in the interests of the residents of Caerphilly county borough council.

The test mentions economies of scale. Economies of scale rarely provide that in reality, economy of flow is a more effective approach. An analysis of economy of flow through a system identifies where waste has become 'hidden' could assist an evidenced based decision on what services would effectively be regionalised. A further consideration would be any learning from previous approaches where regional arrangements have been tried before.

Consultation Question 2. (Para 2.3.35):

In this White Paper the Welsh Government has set out a number of areas which it believes should be required to be delivered on a regional basis.

a) Do you agree that these areas should be delivered regionally?

Caerphilly Council has a long history of partnership working having nearly 70 formal partnerships and collaborations identified within our Partnerships and Collaborations Protocol. However, we only support delivery on a regional basis where there is a sound business case setting out demonstrable benefits to the residents of Caerphilly.

Where the business case for regional working has been made then strategic regional delivery of Economic Development, Transport, and Land Use should follow the Cardiff Capital Region footprint. However, while some listed services would suit the Regional Joint Governance footprint, others which relate closely to other public sector delivery i.e. in health, social or community issues may be better suited to the health board/police (Greater Gwent) footprint, i.e. Public Protection and Social Services,

Inevitably, there will be an overlap between the national and regional economic development functions and the interface with Welsh Government is pivotal in these areas. It is important that these respective roles and functions are clearly understood and that frequent dialogue is maintained throughout. As currently, we have situations where Welsh Government are financially supporting new business into local authority areas and the authority has no knowledge of it until it appears in the local press. We need to ensure that collectively we maximise the inward investment opportunities between us, working as team Wales. A strategic regional approach to tourism could also be included within the Economic development portfolio.

The City Deal footprint is familiar in South East Wales in relation to regional transport planning through the previous SEWTA collaboration. There are further opportunities for collaboration across the highways and transportation sector, which would lend themselves to either a SE Wales regional footprint or a sub-regional Gwent footprint. Areas such as Road safety, engineering design, structures, etc. could offer resilience and efficiencies through a collaborative approach, but regional working should be enabled to evolve naturally.

Subject to the appropriate business case land use planning should be aligned to the City Deal footprint. However, the form that it takes must be determined by the regional planning framework that is adopted. Dialogue is currently taking place between the City Region and Welsh Government officials regarding how a regional planning framework can be developed within the timeframe of the CCR City Deal, whilst ensuring local plan coverage during this transition. In terms of governance, it is acknowledged that the requirements of the Planning (Wales) Act and the White Paper proposals will need to be aligned. The proposal to provide consistent governance across regional working including Planning is welcomed and we would welcome continued detailed discussion as to how this can be undertaken. However, consideration will need to be given to the requirement to provide a gender balance on Joint Planning Boards and how this can be provided within the wider City Deal joint committee framework.

It is accepted that a regional approach is required in order to provide resilience to

the Local Authority Building Control service. However, local knowledge is a key requirement and consideration would need to be given to ensure this is retained. Again, the form taken (regional/or sub-regional (i.e. Greater Gwent) footprint) would need to be considered as part of a regional planning framework as there are obvious synergies to be considered and maximised.

Regional delivery of Public Protection services must be supported by the appropriate business case. Subject to this there should be flexibility for the inclusion of a broad scope of functions to promote service resilience and linkages with services that support Public Protection work; Community Safety and Emergency Planning, for example, which we have integrated well within our other public protection services. Welsh Government might also consider how national coordination of the regional delivery and existing and future all Wales elements of the service (such as illegal money lending, scams, feed law enforcement; and Public Health Bill proposals for a Tobacco Retailers Register, and Special Procedures Licensing) might be achieved.

b) What practical considerations should we consider in taking these proposals forward?

Should Welsh Government proceed with proposals to mandate regional working it should consider the implications of doing so for local communities where this would clearly be to their detriment.

Welsh Government should consider how it might support leadership capacity amongst local authorities at a time when leaders are also managing significant resource reductions coupled with increasing demand in some services. Welsh Government should also be mindful of the social and economic impacts of any changes to the Local Authority workforce in terms of where they may be based within a region.

The role of the local planning committee taking responsibility for planning decisions is of principle importance in terms of local democratic accountability. It is therefore encouraged that this role is retained, but with a regional/sub-regional service unit delivery model servicing the respective committees. The form upon which any “pooling” of resources takes place will need to be determined following agreement of the regional planning framework. For example, if joint LDPs are taken forward, the pooling of resources may be aligned to the joint LDPs rather than a wider City Deal footprint. It is therefore recommended that the basis for “pooling” resources is determined locally once the regional planning framework is determined and agreed, as it is likely to combine both an element of a regional and sub-regional framework.

c) What other ‘ancillary’ powers would be required to ensure the effective exercise of the functions exercised regionally?

The ability to review whether the arrangement is working or not and a power to alter the arrangement should it be found to be not working. It is essential that provisions are put in place so that constituent Local Authorities can take steps to protect themselves and their communities should regional working be shown to be failing. The more layers put in around joint and individual governance the harder it is for the citizen to be heard and involved.

Welsh Government should review the need for any ancillary powers relating to

Information sharing and any implications following the commencement of the General Data Protection Regulations in May 2018.

Consultation Question 3. (Para 2.3.43):

In this White Paper the Welsh Government has set out a number of areas which it believes could also be delivered on a regional basis.

a) Do you think that Local Authorities should also be required to work regionally to deliver these functions?

No, but Local Authorities should be given the flexibility to work regionally to deliver these functions if they consider that there is a demonstrable need. The Well-being of Future Generations (Wales) Act 2015 requires public bodies to demonstrate collaboration in their ways of working. This, together with the other measures proposed, will serve to promote further regional delivery where it is beneficial.

The strategic and operational aspects of the Housing service are acknowledged. However, it is difficult to see how a regional approach to Housing could be developed given the different operating models currently in place – i.e. retained by the Council or via Register Social Landlords (RSLs). Caerphilly is the only landlord within the Gwent region that has retained its council housing stock. Collaboration is however ongoing with other RSLs within the Caerphilly borough area and this has improved recently with the launch of the Common Housing Register. If a City Deal footprint was considered then Cardiff and the Vale councils also have retained their housing stock.

It is also noted that Authorities are at different stages of the delivery of the Welsh Housing Quality Standard, with contractual arrangements well established and operational. To refocus attention to a regional/sub-regional model at this time could threaten the delivery of the WG standard.

Regional working opportunities already established across other areas of housing include, works of adaptation (DFG's), homelessness strategy, Rent Smart Wales and the delivery of affordable housing. Having recently moved to a common housing register for Caerphilly, the option for a regional housing register could be considered. It is agreed that there is scope to explore the regionalisation of a number of key strategic documents such as the housing strategy, homelessness strategy, local housing market assessment, private sector housing renewal strategy, empty property strategy and the Gypsy & Traveller accommodation assessment. This could be achieved using a regional or local action plan approach as the issues addressed through these documents often transcend local authority boundaries.

However, pursuing a regional approach must be supported by the appropriate business case and it would be essential to retain a focus upon local issues and to ensure that they retain the level of priority currently afforded to them. As such further consideration must be given to the governance of such arrangements to ensure an appropriate balance is achieved between maximising the benefits of regionalisation and ensuring our communities still receive the support they need.

The impacts upon housing include social and economic factors such as deprivation, low employment levels, infrastructure demand and the availability of existing housing stock. Therefore, the inter-relationship with the City Deal regional, planning and economic development proposals will be crucial. Indeed, these links

are already established and the development of a high level City Deal visioning document will reinforce this synergy. The inter-connections between the social, economic and environmental impacts upon housing could also be triangulated through a Statutory Development Plan (SDP). The appropriate delivery model to deliver this would be developed following the completion of the regional Plan. It is anticipated the delivery tools are likely to consist of both private and public sector interventions and the role of collaboration in the wider sense would need to be considered.

A considerable amount of regional working is already in place in relation to Waste which has essentially been driven through targeted grant funding support. These collaborations are underpinned by long term and complex contractual arrangements, so to align these with other collaborative frameworks would be difficult in the medium term. There is much debate about waste collection systems and unless one collection model for the region is agreed, opportunities to collaborate are limited. However, there are some areas which can be explored either on a regional or sub-regional framework; including Civic Amenity site management and waste education. Opportunities such as these are already being considered actively through the CSS Wales Waste group. This area demands not only a regional/sub-regional approach but a wider all- Wales approach which has already been successfully undertaken in a number of all-wales contracts. Again consideration needs to be given to the interface with Welsh Government on a number of these matters, as for example, Welsh Government offer education through WRAP.

Agree that, subject to local determination, Community Safety Partnerships could move to footprint that matches the services which support their work. In the Greater Gwent area this would match the Police, Police & Crime Commissioner, and Health Board footprint, and potentially the Public Protection footprint. It would also match the footprints of the Gwent Substance Misuse Area Planning Board, the Gwent Local Resilience Forum, the Gwent Contest Board, the Gwent-wide Adult Safeguarding Board, the South East Wales Safeguarding Children Board, and the South East Wales Violence against Women, Domestic Abuse and Sexual Violence Partnership Board.

b) Are there any other practical considerations we should be aware of?

The proposed governance arrangements risk being complex and adding a layer of bureaucracy; it is important to be mindful of the difficulty of this aspect in regional or any joint working.

It will be necessary to consider the non-devolved issue as highlighted and ensure that the legal duty in the Crime & Disorder Act 1998, for example, to have a Community Safety Partnership for each Local Authority area can be discharged through regional arrangements.

Legislative provision exists in England to allow merged CSPs that has not been replicated in Wales. Welsh government has mandated regional arrangements for Youth Crime Prevention, Substance Misuse and Domestic Abuse through funding stipulations, without adequate accountability measures. The Bill provides an opportunity to reintroduce community and democratic accountability.

Consultation Question 4. (Para 2.3.43):  
Are there any other functions that would benefit from a systematic approach to regional working?

Emergency planning, subject to local determination.

Consultation Question 5. (Para 2.3.43):  
Welsh Government believes that, subject to engagement with local government and other partners, there should be flexibility to enable Welsh Ministers to mandate additional functions to be undertaken regionally.

Do you agree or disagree? Why?

We expect that any proposals would be subject to a sound business case setting out demonstrable benefits for the residents of Caerphilly.

Consultation Question 6. (Para 2.3.44):  
The Welsh Government believes that the new arrangements should not prevent Local Authorities using their existing powers to undertake additional functions regionally.

Do you agree or disagree? Why?

Agree that Local Authorities should retain this flexibility.

Consultation Question 7. (Para 2.4.16):  
The Welsh Government believes that some back office and transactional services ought to be organised and delivered regionally or nationally.

Which services do you believe could best be organised and delivered these ways?

It is important that there is clarity regarding what is meant by 'back office and transactional services'. It should be noted that the KPMG report June 2015, page 6, states 'it is erroneous to assume that there is a firm distinction between administrative (or 'back office') and front line activities. In reality, all activities within a local authority should be geared towards the achievement of the organisation's objectives". Where new interfaces, handovers of work, and extra processes are created there is a risk of duplication and bureaucracy.

However, subject to the appropriate business case, there may be benefits in organising the following additional activities on a regional i.e. for CCBC Greater Gwent footprint:

- Welsh language
- IT provision
- Legal Services
- Payroll
- HR transactional services
- Procurement
- Information Governance
- Performance
- Internal Audit
- Administration of Housing Benefits and the Council Tax Reduction Scheme
- Contact centre arrangements potentially with public sector partners

- Order processing and Creditor Payments

The above list is not exhaustive as there could be other services that may be best organised on a regional (Greater Gwent) basis, but at this stage the obvious 'strong candidates' have been listed.

Consultation Question 8. (Para 2.4.16):

The Welsh Government believes that overcoming data sharing issues is key to taking forward greater regional working of back office functions.

a) What legislative obstacles have made progress on sharing services difficult?

None identified. Privacy Impact Assessments at the very start of any new collaboration are essential, as are establishing the relationships between each partner organisation in contracts at the beginning, and making sure records management responsibilities are clear.

b) How have they been or could they be overcome?

Agreed Information Sharing Protocols and appropriate fair use notices.

c) What challenges does data sharing pose?

Ensuring appropriate Information Governance arrangements are in place at the outset will ease the way for regional working.

Cultural barriers can be significant in terms of sharing information. Staff may be fearful of breaching data protection law, so whilst we have our information sharing agreements which help with routine sharing of information, training/knowledge-building will support staff to confidently make the daily decisions that they are faced with. Welsh Government may wish to consider developing further the e-learning course targeted at staff in public and third sectors available via the All Wales Academy. Outputs from the recent Public Services Leadership Group on information sharing may also assist.

Welsh Government may consider the potential for technological barriers and what support it can provide for common/shared systems.

Consultation Question 9. (Para 2.4.16):

The Welsh Government believes sharing more back office functions would be helpful. There are a number of options:

- Enable the NHS Wales Shared Service Partnership for providing services to local government (and others)
- Establish a similar model to provide back office services to local government (and others).
- Establish an alternative model to provide back office services to local government (and others).

a) Which do you believe would be most appropriate to best support regional working? Why?

Establish an alternative model based on a local government regional footprint to ensure that arrangements best support Local Authorities to meet the needs of their communities.

b) What other alternative models could work effectively and what steps could the Welsh Ministers take to enable or encourage local government-led alternative models to be implemented?

Our preference would be to build upon the long history of partnership working in Greater Gwent.

Consultation Question 10. (Para 2.4.21):

The Welsh Government believes that joint understanding and planning of public sector assets is essential to maximize their impact and that this requires regional mapping of estates assets and future intentions.

a) How can this joint governance and decision making best be achieved?

We would wish to build upon the existing well developed partnership arrangements to best meet the needs of our communities. Given that the public sector delivery footprint in the Greater Gwent area is common for the local health board and police force this footprint may offer an opportunity to leverage the best use of public assets for local communities. A wider footprint risks distance from local 'place'.

There is an example in Cornwall where public assets (Police, Health, local authority, Fire) are jointly managed in a citizen centred way which may provide Welsh Government with some insight.

b) Is the larger economic footprint the right one?

This footprint may be appropriate for some assets, but not others.

Consultation Question 11. (Para 2.5.16):

The Welsh Government believes a strengthened joint committee (a 'Joint Governance Committee') offers an appropriate governance model for regionally delivered services and intends to set out a framework for local government to use to deliver this.

a) What should the democratic accountability and scrutiny arrangements be for such a model?

The framework should allow the flexibility to develop the appropriate structures according to local (regional) need. There is a danger of adding structures and governance arrangements that require resourcing, that are confusing to all stakeholders, and which do not add value.

b) Should each participating Local Authority have equal voting rights or should they be weighted in some way?

This should be left to local determination, but there should be a recognition that population level and political balance varies across regions. The model adopted by Police and Crime Panels for citizen and political accountability could be used.



Consultation Question 12. (Para 2.6.5):  
The Welsh Government believes that in order to put in place arrangements which reduce complexity for Authorities and their partners the position for Bridgend needs to be considered. Although Bridgend is fundamentally concerned in this, other partners including other Local Authorities and the Local Health Boards also have valid interests. We are therefore seeking views on how best to address the issues set out here.

This should be for local determination by Bridgend.

Consultation Question 13. (Para 2.7.9):  
The Welsh Government believes that 'Option3: A framework and a Footprint' is the most appropriate model for future regional working.

a) What are your thoughts on the proposed mandatory economic development footprint for 'Joint Governance Committees'?

Yes, we agree that this footprint is correct, subject to the governance structures below being kept as simple as possible, and with the benefits of regional working to the residents of Caerphilly being made out in a robust business case..

b) How could a framework approach for sub-regional working in other services areas operate in practice?

We anticipate the Greater Gwent area as being the appropriate footprint for other services and should also be considered for those services that work closely with other public sector partners i.e. health and the police.

c) Is it appropriate for there to be flexibility for regional working to cross economic development boundaries in exceptional circumstances? Which circumstances would they be?

Yes.

d) How should the governance arrangements at the mandatory economic development 'Joint Governance Committees' have oversight of sub regional working?

This should be kept as simple as possible as there is a risk of over complicating the governance landscape.

Consultation Question 14. (Para 2.7.9):  
The Welsh Government are seeking views on the appropriateness of seeking powers to create a Combined Authority, in particular, comments on what minimum expectations there should be in considering the appropriateness of creating a Combined Authority would be welcomed.

Yes, this flexibility would be supported. The initiative must come from the local authorities involved not Welsh Government.

Consultation Question 15. (Para 2.8.7):  
The Welsh Government believes that a mandatory financial framework should be developed to ensure the expenditure of each 'Joint Governance Committee' is met through pooled contributions from the constituent Local Authorities.

a) Should the expenditure of 'Joint Governance Committees' be met by constituent Local Authorities, in proportions to be agreed locally, to ensure the most flexible approach?

Yes.

b) Should the framework provide for a default position if local agreement cannot be reached, and how such a process might be triggered?

This is not supported as it is considered that this should be determined locally.

c) What further considerations might relate to, or need to be included in, a financial framework?

Consideration needs to be given to what the arrangements will be to cover risk and liability. Our insurers, and the insurer of the authority we are seeking to collaborate with, need to see the proposals and be comfortable that liability has been considered so that they can give agreement to provide continuing insurance cover to the collaborations.

Consultation Question 16. (Para 2.10.7):

The Welsh Government believes that to support organisations to move to a more consistent and regional approach to delivering services it will be necessary to issue statutory guidance where there is an identified need.

Do you agree or disagree? If you agree, what types of advice, guidance and support on leadership and workforce matters might lead to greater local, regional and national consistency?

Guidance, learning and support is always welcome, statutory requirement is not. It is noted, however, that whilst regional delivery of specified services is proposed to be mandated, combined services are not. There is the potential for inconsistencies in workforce matters to remain.

Purposeful and distributed leadership will be the key driver to the successful transformation of local government. However, there appears to be little reference as to how this capacity and capability is going to be enabled and enhanced across local government. A strategic workforce development plan is needed and the capability and capacity to undertake this has reduced significantly across local government. This in itself is an area of potential collaboration as very few Councils have this capability and capacity.

The role of Academi Wales is pivotal in taking this agenda forward and urgent engagement with local authorities on a joint approach to both workforce development and leadership is needed. A sub-regional accredited leadership programme has been developed and successfully implemented across the PSB area for senior leaders and politicians alike (Leadership in Public Services (LiPS) programme). The introduction of such a programme across the regional footprints would ensure a consistent approach and a minimum standard of value based leadership, providing the necessary skill set to lead a regional collaborative change programme.

Successful collaborations need time to develop and purposeful leadership to take them forward. Local authorities over recent years have reduced the capacity of its workforce in order to balance reducing budgets. In order to drive this change forward, leadership capacity will need to be considered and addressed. The

Collaborative Change fund was previously made available to fund such capacity. Will a similar budget be offered to contribute towards this transformational reform agenda?

Consultation Question 17. (Para 2.11.4):  
The Welsh Government believes it would be helpful if Public Services Boards could collaborate or merge across Local Health Board Boundaries.

Do you agree or disagree? Why?

Yes, we agree that this flexibility would be beneficial.

Consultation Question 18. (Para 2.11.4):  
The Welsh Government believes Public Services Boards should be allowed to de-merge as well as merge. Do you agree or disagree? Why?

Yes, to allow Public Services Boards to arrange themselves to best promote the well-being of the communities that they serve.

### *SECTION 3*

Consultation Question 19. (Para 3.1.7):  
The Welsh Government would welcome comments on what minimum expectations there should be in considering the appropriateness of voluntary merger.

As we do not wish to engage in a voluntary merger we do not feel able to comment.

### *SECTION 4*

Consultation Question 20. (Para 4.2.3):  
The Welsh Government would welcome comments on any of the proposals set out previously in the draft Local Government Bill and associated consultation paper, Annex One refers.

Objective setting between Cabinet members and Leaders is not evidenced as creating improvement although it may create greater accountability. This is already part of WLGA good 'member charter' so this could be promoted as opposed a mandate.

4.3.9: Whilst we very much welcome WG commitment to change the performance framework and support good governance, we do not agree with the method by which para 4.3.9 suggests it is done, particularly around the CIPFA framework which is prescriptive.

The WLGA welcomed the previous proposals regarding the reduction of regulation and promoting self-assessment and peer assessment but warned against turning successful voluntary and sector-developed models into a prescriptive statutory assessment and regulatory regime. SA should be an ongoing cultural thing, not a once a year big bang process.

In many cases Peer Review does not aid improvement in relation to the energy expended to implement one.

Transferring grants to the Revenue Support Grant should be achieved as soon as reasonably practicable allowing local discretion on how funding should be best utilised to meet the needs of local populations. Local government as a funding

recipient is closest to the ground, more in touch with communities, and best able to make decisions that benefit current and future generations.

Consultation Question 21. (Para 4.3.8):  
The Welsh Government believes that Part 1 of the Local Government (Wales) Measure 2009 should be repealed for all 'Improvement Authorities'.

Do you agree? Why?

Yes, this is becoming an increasing issue of duplication and frustration for local government as our planning and performance framework is being aligned under the Well-being of Future Generations (Wales) Act 2015. If the Measure is no longer appropriate for local authorities it makes sense to remove for Fire and Rescue Authorities and National Park authorities.

## SECTION 5

Consultation Question 22. (Para 5.2.8):  
The Welsh Government believes there should be minimum expectations on Councillors for interacting with their local constituents.

Do you agree or disagree? If so, what should these minimum expectations be?

We generally agree that councillors will want to be accessible but it is unclear how you will know if the minimum expectations are being met. Someone can be available but not helpful or helpful when not available often.

The minimum expectations can be guidelines but would avoid being prescriptive as all circumstances are different. It may be beneficial to ask citizens what they would like or expect from their councillors before committing to a minimum expectation.

Consultation Question 23. (Para 5.3.2):  
The Welsh Government believes it could be helpful to make some minor changes to existing area committee legislation to increase their flexibility.

What do you believe these changes should be?

No comment.

Consultation Question 24. (Para 5.4.3):  
The requirement for Local Authorities to work on a regional basis will require Councillors, the Local Authority and employees to balance the responsibilities they have to their local area, with those for the larger region.

How best could this be achieved?

Support such as training and guidance will help to clarify and define roles and responsibilities. Case studies of benefits, showing how this translates from theoretical to real action will help. Good leadership is critical during this time of change. The issue of different pay grades for same jobs cannot be ignored as this will be problematic to standardising regional working. We believe that appropriate Guidance would be necessary to support this.

Consultation Question 25. (Para 5.5.4):  
The Welsh Government intends to make a return to a form of the committee system available to Local Authorities where it best meets local circumstances.

How would this option best work within the context of the proposals for new regional arrangements?

Agree this should be an option for local determination.

Consultation Question 26. (Para 5.6.4):  
The Welsh Government believes it may be appropriate to limit future designation of relevant statutory Senior Officer posts to a regional level where the functions are being delivered regionally.

Do you believe this is appropriate? Why? If so, how might this best be delivered?

We are concerned that this would create a potential conflict of interest that could not be resolved, or may result in a confusing situation where there are Statutory Officers both locally and regionally.

## *SECTION 6*

Consultation Question 27. (Para 6.1.7):  
The Welsh Government believes there are things that can be done now to help build resilience and renewal in the sector in the short to medium term and would welcome comments on the list of actions at paragraph 6.1.6. Views on any other actions which could be taken are also welcomed

## *SECTION 7 & General Questions*

Consultation Question 28. (Para 7.1.14):  
The Welsh Government is seeking initial views on all of the proposals set out in Chapter 7 on elections and voting.

Consultation Question 29. (Para 7.1.14):  
The Welsh Government would welcome any views on the potential financial and non-financial benefits and costs associated with the proposals in the White Paper.  
There is the potential for duplication and unnecessary additional bureaucracy; any changes must result in demonstrable benefits.

Consultation Question 30. (Para 7.1.14):  
The Welsh Language Impact Assessment published alongside the White Paper outlines the Welsh Government's view of the effect of the proposals contained in the White Paper on the opportunities for people to use the Welsh language and treating the Welsh language no less favourably than the English language. The Welsh Government seeks views on that assessment.

a) Are there any other positive or adverse effects not identified in the assessment?

There are positive effects in terms of the possible regionalisation of some Welsh

language services and the recognition that a public sector workforce will need to be developed with sufficient Welsh language skills to meet the needs of a growing number of Welsh speakers in Wales. This will involve the tertiary education sector along with local authority education services.

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

None identified.

Consultation Question 31. (Para 7.1.14):  
The Children's Rights Impact Assessment published alongside the White Paper outlines the Welsh Government's view of the effect of the proposals contained in the White Paper on children and young people. The Welsh Government seeks views on that assessment.

a) Are there any other positive or adverse effects not identified in the assessment?

None identified. Although children and young people will need to be consulted in any local decision-making to reconfigure services.

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

Consultation Question 32. (Para 7.1.14):  
The Equalities Impact Assessment published alongside the White Paper outlines the Welsh Government's view of the effect of the proposals contained in the White Paper on protected groups under the Equality Act 2010. The Welsh Government seeks views on that assessment.

a) Are there any other positive or adverse effects not identified in the assessment?

None identified.

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

Consultation Question 33. (Para 7.1.14):  
Please provide any other comments you wish to make on the content of this White Paper.