

Consultation Response Form

Your name: **Cllr Neil Moore – Leader of the Vale of Glamorgan Council**
 Organisation (if applicable): **Vale of Glamorgan Council**
 email / telephone number: nmoore@valeofglamorgan.gov.uk
01446 709470
 Your address: **Civic Offices, Holton Road, Barry CF63 4RU**

Other issues

Q26	We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:
<p><u>This question will be answered here and duplicated at the end of the consultation paper to keep the format complete</u></p>	
<p>We address this more general question first as a preface to our other remarks because the specific questions in the consultation document offer no opportunity to comment on the fundamental principles and rationale for merging existing local authorities.</p> <p>All the questions are presupposed on the implementation of the Williams Commission proposal for merging of authorities and on associated issues.</p> <p>This in our opinion is counter to the co-production approach avowed in the White Paper – Local Government has not been consulted or involved well enough in reaching the conclusion to merge authorities.</p> <p>The ‘step change in behaviour, performance and approach’ called for by the Williams Commission has resulted in the merging of existing local authorities and a continuation of a range of initiatives already in hand. It is our contention that the focus on mergers will detract from the work really needed to change culture and performance.</p> <p>Firstly, we do not agree that the Williams report conclusions are convincing:</p> <ul style="list-style-type: none"> • It does not analyse why some small Councils work well and some large Councils do not, in order to learn from effective practice and from poor performance. • It certainly does not follow the principle of ‘form follows function’ which the White Paper advocates. No attempt was made to identify which services or functions would operate best at what scale and level, taking into account needs for specialist expertise and resilience. The proposal for 	

merged authorities assumes that all services are based on a single 'one size fits all' unit. There is no justification for this assumption.

- No detailed or robust cost benefit analysis is provided for mergers as a whole or individually. This is concerning, as carrying out the exercise will have a major cost which will have to be borne by the local authorities and will inevitably lead to a serious disruption to services. The White Paper section on cost benefit simply illustrates the serious degree of uncertainty about cost, about savings and benefits, and about who will pay. It is a serious failing to be pressing ahead at pace with an initiative which has no robust cost benefit analysis.
- The Commission provides no detailed case to explain why mergers of existing local authorities will result in quicker and effective development of larger service units than current collaboration developments. This is a serious omission since mergers will inevitably create several years of disruption to Local Government staff and structures, and a hiatus in focus on quality services.
- It is accepted that collaboration is not easy but neither is re-organisation. It will be many years before any alleged benefits from merging councils accrue. In the years leading to the merger there will be uncertainty and the planning and work involved in setting up the new councils will be a major distraction for key staff. Experience also shows that following vesting day there will be a period of about 3 years before the new councils "bed down" and operate fully effectively and before any significant improvement will be seen.
- The Commission considers the complexity of public services to be a problem but the White Paper only proposes a relatively crude and simplistic solution of mergers of some neighbouring authorities. A small reduction in the number of over-arching local authority units will do little to reduce complexity. The complexity, from the public's perspective, is in the wide variety of different services and departments within authorities and other public bodies, and not in the number of local authorities. The key issue is complexity for the service user and making their experience and navigation of the complexity more seamless – this is not addressed
- The proposals for Powys open a window into more fundamental reform of public services, in particular about primary health and social care. The White Paper fails to consider these more fundamental options.

We agree with the Commission's view that some services need to function at a wider scope than existing in some local authority areas and that some services would be more resilient and could support more specialist expertise on a larger scale. However, we believe that this could and should be achieved by collaboration while retaining existing local authorities as base 'democratic units' bridging the potential divide between large services units and the public and local communities.

"The issues and challenges they (public bodies) seek to address are not and never will be neatly self-contained within organisational or geographical boundaries. That demands an approach to collaboration which is strategic, selective, evidence-based and effectively implemented and monitored."

“Williams Commission”

We would argue that current collaboration developments are progressing well in many service areas, based on commitment and trust rather than dictat. Joint posts with Health, Joint Education Service, Integrated Care and Health, Internal Audit, Civil Parking Enforcement, Waste Management, Shared Senior Management in both Mental Health and Learning Disability Services, and Regulatory Services (currently being progressed) are all examples.

N.B.

All the responses to the questions which follow should be seen in the context that we oppose the proposed mergers and consider that the Vale of Glamorgan Council should continue in its current form, but with the development of regional collaboration for services needing to function at a regional level e.g. Cardiff Capital Region, Swansea Bay City Region, Mid and Central Wales (Ceredigion & Powys) and North Wales Regional Leadership Board.

The future of Local Government – what should we expect of Local Authorities?

Q1	How can Local Authorities engage more effectively with their communities, about the challenges of sustaining services as they are currently delivered and the need for change?
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After the elections in 2012, the Vale of Glamorgan Cabinet took a decision to hold its Cabinet meetings every quarter in each of the 4 main Towns (Barry, Penarth, Llantwit Major and Cowbridge) at 6pm and invited the public to attend. After the formal meeting the Cabinet opened the meeting to public questions on any subject area relating to the Council and gave answers to those questions at that time. The Cabinet also received comments and suggestions that were made at the time and had full engagement with the public and press that were present. These arrangements have continued. The Cabinet also hold Community Meetings, again at 6pm, in other Community Council areas on a regular basis.

This has formed the basis of engaging with all communities as well as being open to comments and challenge on an ongoing basis.

Recently, the Vale Council has instituted a “Reshaping Services” programme to engage with the public and our partners across the County, including the Community Councils. This programme lays stress on the requirement to consider the development of alternative service delivery models in response to the major challenges posed by very severe budget cuts. This will include aspects such as co-production and possible solutions such as mutualisation, and will involve a wider engagement of communities than ever before. It will

also involve making the general public aware of the issues we face and how they might contribute to resolving them.

This requires a major shift in public knowledge and thinking. Public reaction to change and reductions in service (or greater personal responsibility) has hitherto been fragmented and defensive of the specific services the public currently receive.

This will require a sensitive approach, but one that must ensure everyone understands the reality of the situation and accept that inevitably services will change. It must be understood that services may be either cut altogether, reduced or provided in a different way to the way they are currently delivered.

Q2

What more could the Welsh Government do to assist Authorities with this dialogue to improve their performance in the delivery of priority services?

Welsh Government should lead on a national conversation on this issue.

The issue of the challenges of reducing funding and necessary changes to services should not be conflated with improving local authority performance. Unless the conversation is clear and handles the distinction carefully, the public could receive the impression that local authority inefficiency is the cause of the need for changes/reductions to services.

Welsh Government could be more pro-active with Local Government and not simply look at simple performance figures but look at the detail behind it before making comments on that performance. Performance indicators should be focused and remain concentrated on the real issues that affect people's lives.

Q3

What specific suggestions do you have for reducing and simplifying administration which would free up time and resources to deliver and improve services?

The grants regime involves excessive bureaucracy in requiring Local Government to make detailed submissions and returns. As a general rule Welsh Government should proceed on the basis of agreeing outcomes and then funding them as part of an unencumbered settlement. This would give Welsh Government confidence that outcomes will be achieved and enable

Councils to make best use of resources within extremely demanding financial constraints.

We would also like to see a rationalisation of plethora of external regulators and hope that the result of the current national review will be to achieve this.

Welsh Government should consider the implications of any new legislation that is introduced and the effects (particularly financial) that it has on the authorities that have to either provide the service or enforce the legislation enacted. It is all too easy to try to resolve a problem but not consider the implications on the organisation that has to carry out the work or the knock on effect it has on another related organisation.

Reforming Local Government – Strengthening democracy, sustaining and improving services

Q4	What specific changes should be made to the way in which Local Authorities are currently constituted to ensure openness, transparency and clarity of accountability?
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Vale of Glamorgan Council has taken many steps in recent years to increase openness and contact with the public. – see the answer to Question 1.

Consideration of allowing the public to speak at Planning Committees is an obvious example, albeit it has to be limited to representatives rather than everyone present being able to speak.

The White Paper outlines Welsh Government initiatives in this area, for example web casting, which will aid further transparency, and the Council is taking advantage of these opportunities.

As to changes to Council constitutions, it should be noted that the Vale Council is currently reviewing its constitution in the light of the recently-issued new model constitution.

Q5	How should the scrutiny support programme be shaped to support improvements in the effectiveness of scrutiny?
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In terms of scrutiny support, there are already various all-Wales initiatives under way, and the presence of a Centre for Public Scrutiny resource for Wales has helped to develop linkage with existing Scrutiny Networks and to progress specific work such as the developing Outcomes and Characteristics for Effective Local Government Overview and Scrutiny. Council Officers are actively involved in that work. At present, the Characteristics are not mandatory but they do provide an opportunity to develop a framework that Councils can use to continue to assess their own scrutiny arrangements with a view, as is already the case, for continuing to monitor areas for improvement.

The Council understands that the Welsh Government are in the process of developing a series of consultation documents regarding scrutiny, to be published this Autumn / Winter. These are awaited and will be the subject of consideration by the Council's Scrutiny Committee Chairs and Vice-Chairs Group and Democratic Services Committee. It is assumed that those consultation documents will build on the outcomes of the all-Wales Scrutiny Improvement Study facilitated by the WAO.

Q6

In what other ways should scrutiny be strengthened to drive service improvement?

The recent report of the WAO - "Good Scrutiny? Good Questions !!" and the 9 specific recommendations contained in that report cover the areas where support mechanisms and liaison between local authorities, Welsh Government, the WLGA and regulators will need to be developed if the effectiveness of scrutiny is to be enhanced. There is no need to reproduce those themes in this response as work is under way (including within the Council) to build on those recommendations.

As alluded to in the Consultation Paper, there is scope for improved alignment between the various audit, inspection and regulation regimes and Local Authorities' scrutiny processes. 2 of the 9 recommendations alluded to in the response to Q5 deal with this aspect. The Council concurs with the argument that :

- Scrutiny needs to be able to draw effectively on the work of auditors, regulators and inspectors and that scrutiny activities are complementary with the work of those bodies
- External review bodies need to take account of scrutiny work programmes and, where appropriate, the outputs of scrutiny activity, in planning and delivering their work.

The Williams Commission and the Consultation Paper itself clearly accept the rationale of the above.

Scrutiny and Governance – Fire and Rescue Authorities

Q7	How might governance and scrutiny of strategic service and financial decisions be best secured?
The Council has no specific comments on this question.	

Community Governance

Q8	What suggestions do you have to ensure communities have an effective voice in the decision making process of the new Authorities?
<p>The key to engaging people is that they have a real opportunity to contribute to decisions and the allocation of resources and to see the ensuing benefits – at their home and community level. Conventional means of consultation about plans and decisions formulated by the Council may become less appropriate. This means devolution or delegation about local issues, services and developments to communities themselves. The Reshaping Services programme and community engagement mentioned in Question 1 above is relevant to this issue.</p> <p>Involving communities in this way, and developing and maintaining relationships, takes considerable time and resources which is difficult in current financial climate, but is nevertheless essential if there is to be a real dialogue between the local authority and its residents.</p> <p>The Williams commission says that ‘too much effort is wasted on managing complex public sector systems and relationships’, without seeming to realise that its other proposals about involving communities require complex and demanding relationship building – with communities and other public services.</p> <p>It could be argued that engagement with communities and your partners does not have to be complex or demanding if it is done correctly and that each of the parties have the ability to trust one another or at least talk to one another in a civilised and mature conversation.</p>	

Q9	What sort of consultation, engagement and feedback processes should the new Authorities have with communities?
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The Council's Reshaping Services programme and community engagement strategy covered in Question 1 is again relevant, as are previously answered questions.

The principles and good practice for consultation, participation and feedback are included in the National Principles for Public Engagement. It is essential to adopt the spirit and practice behind the principles.

Beyond the summary of the National Principles there is established practice in extensive literature on the subject, for example within the National Strategic Framework for Community Development in Wales, where the Six Key Components of Community Development are identified. It clearly demonstrates that it should be community led, include all parts of the community, change the balance of power and allow empowerment, recognise the length of time needed to achieve change, provide a learning process and be a holistic process.

National Partnership arrangements

Q10	How can we best engage with Local Government to take forward a programme of Local Government reform?
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Again this question pre-supposes that there has to be Local Government Reorganisation. The Williams Commission was supposed to review all public services, but it does not do that, and regrettably this White Paper confirms that view.

In the first instance Welsh Government should engage properly with its partners in Local Government and not pay lip service to them, ensuring there is ample time to discuss and debate issues before decisions are made. The Williams Commission is a prime example of what should not happen. There should have been a full and frank debate with the Local Government family before embarking on such a mammoth task, which in the main was unwelcome and unnecessary.

The Commission acknowledges the crucial factors of culture, trust and commitment in successful collaboration and merger. However, Local Government in general opposes the merger proposals and has not been included in discussion and planning which could foster a collaborative culture and shared commitment to change.

Welsh Government needs to listen, discuss and respond, and have genuine co-production with Local Government, much more than it has to date.

We would propose a co-production working group of Welsh Government with Local Government to consider the White Paper responses and to formulate proposals for a draft Bill (if one is necessary). However, it is clear from the

one-sided conversations to date and the decisions that have been taken whilst consultations are ongoing indicates that Welsh Government is determined to press ahead with Local Government reorganisation at all costs, no matter what the Local Government family may think.

Collaboration and cooperation requires a conversation and is a two way street. Welsh Government has to learn that lesson if the services that Local Government provides are to be delivered in the best way possible, efficiently and effectively, and meeting the needs of the communities they serve.

That being so, it is essential that any national working group set up to consider the way forward has to have as its members representatives of **all** Councils, and not simply a smaller number who it is assumed will be able to speak on behalf of Welsh Local Government.

How do we ensure Local Government performance is improving and continues to improve? – Improving Performance

Q11	How can we help and encourage Local Authorities to be more proactive in identifying and responding to delivery or governance issues?
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To begin with it is pleasing to see the words ‘encourage’ within this title, as in most cases Local Government appear to be quite simply the ‘whipping boys’ of Welsh Government.

Local Government is already under scrutiny from within, which is healthy and the correct process to have in place. However, we are over regulated and in most cases unnecessarily so. If any delivery or governance issues are identified there are systems in place that can be brought into action. We have the back up of our partners with our Local Government family who can help us and provide advice on best practice as well as the support available through professional organisations and through the WLGA.

We are also aware of the advice and support within Welsh Government that can be drawn upon if necessary, so further support is not always necessary to answer the question specifically.

We would need to know more about any problems that local authorities might have in identifying delivery or governance issues, before being able to suggest any further comment on the help necessary.

It should however be emphasised that Welsh Government’s relationship with Local Government about delivery and governance issues at times feels punitive rather than supportive. What is missing is graduated, practical support, pointers to good practice, and perhaps peer support arrangements. However, it may be that Welsh Government and their officials do not have the

capacity or expertise to fulfil such a role.

Q12 What should be the principles and standards for performance management and performance reporting across Local Authorities, and the broader public sector?

Principles and standards based upon focused outcomes and measured through a sound evidence base should be the correct approach to determining whether there is good performance management in any organisation.

The high level well-being outcomes being developed by Welsh Government will be useful as joint objectives between Welsh Government, Local Service Boards and local authorities.

It is essential, however, that local priorities are allowed to be developed as a means of delivering shared outcomes locally. Local performance management arrangements should then follow, monitored and scrutinised locally and overseen by external regulators, where external regulators are an essential element of that process.

Performance indicators and measures need fundamental review, changing what Welsh Government requires and collects. This should be renamed 'required data collection' rather than titled performance indicators which should be reserved for outcomes. This would help change the existing culture and attitude which is focused on process and output indicators and look instead at outcomes.

Q13 In what ways could we more effectively use the money we invest in supporting Local Authority improvement?

Training and development input has focused on frameworks and theory (e.g. Results Based Accountability) but the major need is for practical help on the ground, demonstration of what works, and sharing of effective practice.

The future shape of Local Government

Q14	Do you have specific suggestions for powers and responsibilities which could be considered for devolution to the new Authorities?
<p>Again, the presumption here is that new Authorities are needed, whereas the case simply has not been made.</p> <p>The powers and responsibilities most relevant to devolve to local authorities would be those in relation to Public Health, and aligned with integrated health and social care.</p> <p>The White Paper’s proposals focus too much on boundaries of local authorities. The public’s experience of public services, which was a prime focus in Making the Connections and acknowledged in the Williams commission report, is lacking from the White Paper.</p> <p>Alignment of boundaries of local authorities with Health and Police Authorities should not be rigid because the public will not see effectiveness in such alignment but in terms of delivery to their needs from a mix of services.</p> <p>More consideration needs to be given to the fit or necessity of proposed merged authorities with other regional initiatives flowing from the Simpson and Hill reviews and City Regions before pressing ahead with mergers.</p> <p>See Question 26</p>	

Facilitating and incentivising voluntary merger

Q15	Does anything else need to be covered in a power to achieve a voluntary merger?
<p>It is certain that if allowed to determine their own future and destiny, some local authorities would consider a voluntary merger. However, that would only happen if those considering it agree on a way forward without being forced into an unholy alliance. Shot-gun marriages do not and cannot work and the same will be the case in Local Government.</p> <p>Incentivising voluntary mergers seems to put unseemly haste before systematic planning for what would be most effective as an architecture of public services.</p> <p>If ‘form follows function’ then a more considered analysis is needed of the demands on public services and the forms to meet demands and deliver functions most effectively.</p> <p>On the surface the Welsh Government seems to adhere to the expression, “form follows function”. It seems to be the doctrine within Government that</p>	

the way something (a service) looks should be determined by its purpose. Is this really true? Does the phrase hold up upon deeper inspection? Or is this too simplistic?

Local Government services are more complex than that. A 'one size fits all' solution does not work within Local Government. All services, their clients and the needs of the individual can all be different and that is what is so important about Local Government. The clue is in the title 'Local' and local needs need local solutions and those solutions need to adapt to the situation pertinent at that time. It is true that some Local Authorities may be failing in some areas but excelling in others and that will always be the case.

The case for mergers has not been made by Williams and simply merging authorities together just because they are within a health boundary, a police boundary or a now abandoned convergence boundary is simply unacceptable.

During this consultation period a Welsh Government document entitled 'Invitation to Principal Local Authorities in Wales to submit proposals for a voluntary merger' was published on 18th September 2014 with responses required by 28th November 2014.

We note the steps that Councils who intend putting forward a case for voluntary merger will have to take, according to that document. Detailed work will need to be done by those Councils to prepare robust and convincing cases. However, no such work will be required of those Councils whose mergers are part of the Williams "map". This seems to be an anomalous position.

Q16	Is your Authority considering submitting a proposal for voluntary merger?
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The Vale of Glamorgan Council is not intending to submit a proposal to voluntarily merge with any Authority.

Our Members are adamant that the Vale of Glamorgan Council can stand alone as a very reliable, efficient, effective and well run authority. Members from all Groups have already indicated that their wish is to remain without change and it is envisaged that a merger would only take place if forced by legislation.

The Members have determined that they do not wish to merge with Cardiff Council.

However, since the new Minister has been in office he has made it perfectly

clear that he will indeed force through the mergers if necessary.

As indicated earlier he has now published a Welsh Government document entitled 'Invitation to Principal Local Authorities in Wales to submit proposals for a voluntary merger', with responses required by 28th November 2014.

That being the case, the Vale of Glamorgan Council may consider looking to another local authority of a comparable size and culture and having the same ethos as the Vale of Glamorgan Council, and has considered whether Bridgend may be a more acceptable option, but any decision has yet to be taken, if indeed one is taken at all.

That combination would give a population of 266,100, comparable with other mergers, and both authorities lie in the Cardiff City Region. That would give a ratio of 3548 per Councillor. Cardiff would then remain with an electorate with a ratio of 4605 electors per councillor (see Question 17 for comparisons).

Local Authority electoral wards

Q17	Is there anything else we need to do in order to ensure LDBCW is able to effectively consider and make recommendations for electoral arrangements in the proposed Authorities?
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Again this presupposes, unjustifiably, that a new authority needs to be established.

Serious consideration needs to be given to:

- issues of parity in number of electors per Councillor
- the practicality of large numbers of electors per Councillor

in particular in relation to rural wards.

The White Paper proposals would result in an average of approximately 6300 electors per councillor in Cardiff and the Vale, but in Powys an average of only 1774 electors per councillor. Even setting aside the geographical demands in Powys, is this disparity equitable?

Even taking another example in a populated area, Swansea would have a ratio of 3182 electors per Councillor and even RCT and Merthyr would have a ratio of 3910 electors per Councillor. At the same time Carmarthen (another stand alone Council) would have a ratio of 2452 electors per Councillor and the combined Newport and Monmouthshire would have a ratio of 3164 electors per Councillor. Where is the equity in these figures?

LDBCW should set out and consult on principles about elector representation and reasonable democratic equity, as the foundation for decisions about

numbers of Councillors. At present the proposals seem to be random numbers driven by finance considerations rather than what would enable effective representation.

Remuneration of Elected Members

Q18	Is there anything else we need to do in order to ensure the IRP is able to effectively consider and make recommendations for payments to councillors in the proposed merged Authorities and any preceding shadow authorities?
<p>Reducing the number of Councillors and increasing the number of electors represented will increase constituency workload for Councillors. Greater workload is also likely with fewer scrutiny committee members.</p> <p>This would increase the weekly workload of councillors beyond the average 3 days/week assumed by the IRP, and imply increases in allowance so reducing expected savings.</p> <p>A reduced number of Councillors would reduce the opportunity to improve the diversity of Councillors.</p> <p>The IRP will need to review its assessment of Councillor workload as the basis for allowances.</p> <p>Rather than fewer overstretched Councillors on increased allowances, more Councillors on current allowances would make for better representation and connection with communities, as well as easier scope for improving diversity.</p>	

Disposal of property and assets

Q19	Do you agree the proposed power for the Welsh Ministers will be sufficient for disposal of property and assets? If you do not agree the proposed power will be sufficient, what specific problems do you envisage?
As it is not anticipated that a Residuary Body is needed as boundaries will not be re-drawn, it is not apparent why WG need to introduce powers to 'enable or require' merged authorities to realise asset related savings.	

Q20	What sort of assistance or guidance might Local Authorities need?
See Question 19	

Collaboration, cooperation and preparation in advance of mergers

Q21	Is there anything else which should be specified for joint transition committees to do in preparing for a merger of their authorities?
Joint transition committees should also agree processes and timescales for preparation of core strategies for the new merged authority e.g. Local Development Plan, Community Strategy etc.	
There are bound to be significant disparities in major strategies and policies of merged authorities which will lead to uncertainty and indecision unless clear guidance and timescales are set out.	

Q22	What other powers might the Welsh Ministers require to prevent harmful damaging behaviour?
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This question is somewhat unnecessary and insulting to those Elected Members in Local Government.

No powers are needed. Councils are mature, democratically elected organisations with a track record of managing in adversity and planning for the future responsibly.

Staffing matters

Q23	What should be the role and responsibilities of the Staff Commission?
<p>Broadly, the Staff Commission needs to set out principles and procedures for reorganisation, provide advice and support, field queries and appeals, and disseminate effective practice. The role of the Staff Commission should, in particular, be:</p> <ul style="list-style-type: none">• Help to develop robust and transparent protocols for the transfer of staff to the new organisations• Provide support in the development of severance arrangements across the merged authorities and perhaps an “all-Wales” approach to out-placement and career transition.• Lead on exploring opportunities for increasing the commonality of terms and conditions of employment across merged authorities• Lead on exploring opportunities for a common approach to pay determination to help avoid a “second wave” of equal pay claims• Providing advice/facilitation in the development of commensurate trade union representative practices (in partnership with the trade unions) <p>We do not envisage the Staff Commission as having a role in making decisions on recruitment into specific posts.</p> <p>There are already extensive examples of established practice already in place in many areas of public service.</p>	

Q24	Is anything else needed to prepare the way for merging Local Authorities?
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The Williams Commission is completely wrong in its view that

- 'It will be much quicker and easier to plan for and implement mergers, and achieve the benefits, without the more significant disruption and cost which would result from redrawing boundaries'.
- 'We do not believe reducing the number of Local Authorities through mergers will create as many staffing and workforce issues as has been the case when Local Government has been reorganised.'

Very significant disruption and uncertainty would result from the staff and organisational structure changes required by mergers.

Merger would mean revision of job titles, job allocations, department structures and locations, harmonisation of terms and conditions, and job evaluations. This process was extremely protracted in the Vale of Glamorgan Council following Local Government reorganisation in 1996. There is no less complexity now and in fact it is more complex today than it was then. The White Paper does not explain why it thinks these processes will be different and easier than for the last Local Government reorganisation.

Councils will need support and additional funding to manage these demands effectively in the context of already reduced staffing and resources.

However, it appears that if Local Government mergers are to be forced through the Welsh Government seem to think that it can be financed by Local Government itself. This is a fallacy and will lead to a bankrupt system and the failure of Local Government as we know it.

Welsh Government should rethink its strategy and talk with Local Government to prepare if necessary for a new way forward, but this time in harmony and cooperation with the Local Government family.

Local Government Funding – Council Tax

Q25	What would be the most equitable approach to raising revenues for local services?
<p>The Council does agree that a review of the balance of funding and local government financial regime as part of the Silk Finance and Tax-raising reforms is necessary.</p> <p>However, this issue is not one that can be viewed in isolation. If local government is to be allowed to contribute to the continued programme of public sector reform this will require greater flexibilities, freedoms and clarity</p>	

from Welsh Government as outlined by the WLGA in their 'In Defence of Localism' publication in June.

In particular we would support the WLGA call for:

- The transfer of all specific grants into the RSG and a restatement of the commitment to reduce the burden of service plans.
- A robust financial process to cost the impact of new legislation and burdens based on the principle that local government only assumes implementation for new responsibilities which are fully funded.
- An acceptance that “managed difference” and local variation are at the heart of local democracy. This means that local services and solutions will be different for different communities.
- That Welsh Government should re-establish a process to understand financial pressures within local government prior to the publication of the settlement, on the proviso that this is not a commitment to full funding of those pressures.
- That Welsh Government should fully commit to the principle of introducing three-year financial settlements to give greater stability in terms of resource planning.

As merging authorities are likely to have currently different levels of Council Tax, a mechanism should be in place for “smoothing out” potential increases.

Other issues

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contention that the focus on mergers will detract from the work really needed to change culture and performance.

Firstly, we do not agree that the Williams report conclusions are convincing:

- It does not analyse why some small Councils work well and some large Councils do not, in order to learn from effective practice and from poor performance.
- It certainly does not follow the principle of 'form follows function' which the White Paper advocates. No attempt was made to identify which services or functions would operate best at what scale and level, taking into account needs for specialist expertise and resilience. The proposal for merged authorities assumes that all services are based on a single 'one size fits all' unit. There is no justification for this assumption.
- No detailed or robust cost benefit analysis is provided for mergers as a whole or individually. This is concerning, as carrying out the exercise will have a major cost, which has to be borne by the local authorities and will inevitably lead to a serious disruption to services. The White Paper section on cost benefit simply illustrates the serious degree of uncertainty about cost, about savings and benefits, and about who will pay. It is a serious failing to be pressing ahead at pace with an initiative which has no robust cost benefit analysis.
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- It is accepted that collaboration is not easy but neither is re-organisation. It will be many years before any alleged benefits from merging councils accrue. In the years leading to the merger there will be uncertainty and the planning and work involved in setting up the new councils will be a major distraction for key staff. Experience also shows that following vesting day there will be a period of about 3 years before the new councils "bed down" and operate fully effectively and before any significant improvement will be seen.
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- The proposals for Powys open a window into more fundamental reform of public services, in particular about primary health and social care. The White Paper fails to consider these more fundamental options.

We agree with the Commission's view that some services need to function at

a wider scope than existing in some local authority areas and that some services would be more resilient and could support more specialist expertise on a larger scale. However, we believe that this could and should be achieved by collaboration while retaining existing local authorities as base 'democratic units' bridging the potential divide between large services units and the public and local communities.

"The issues and challenges they (public bodies) seek to address are not and never will be neatly self-contained within organisational or geographical boundaries. That demands an approach to collaboration which is strategic, selective, evidence-based and effectively implemented and monitored."

"Williams Commission"

We would argue that current collaboration developments are progressing well in many service areas, based on commitment and trust rather than dictat, e.g. Joint posts with Health, Joint Education Service, Integrated Care and Health, Audit, Civil Parking Enforcement, Waste Management, Shared Senior Management in both Mental Health and Learning Disability Services & Regulatory Services (being progressed) as examples.

N.B.

All the responses to the preceding questions should be seen in the context that we oppose the proposed mergers and consider that the Vale of Glamorgan Council should continue in its current form, but with the development of regional collaboration for services needing to function at a regional level e.g. Cardiff Capital Region, Swansea Bay City region, Mid Wales Region (Ceredigion & Powys) and North Wales Regional Leadership Board.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: