

1. ANNEX TWO: Consultation Questions

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SECTION 2

<p>Consultation Question 1. (Para 2.2.1): The Welsh Government believes that it appropriate to consider ‘tests’ to frame thinking around regional working.</p> <p>a) Do you think the ‘tests’ set out are helpful in guiding thinking?</p>	<p>The AEA considers that the tests outlined in the consultation appear reasonable as far as they may affect electoral matters.</p>
<p>b) Are there other tests or considerations that might also be used?</p>	<p>None identified at this stage.</p>
<p>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.</p> <p>a) Do you agree that these areas should be delivered regionally?</p>	<p>We have no comment to make as this question does not directly relate to the AEA’s areas of expertise.</p>
<p>b) What practical considerations should we consider in taking these proposals forward?</p>	<p>We have no comment to make as this question does not directly relate to the AEA’s areas of expertise.</p>
<p>c) What other ‘ancillary’ powers would be required to ensure the effective exercise of the functions exercised regionally?</p>	<p>We have no comment to make as this question does not directly relate to the AEA’s areas of expertise.</p>
<p>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.</p> <p>a) Do you think that Local Authorities should also be required to work regionally to deliver these functions?</p>	<p>We have no comment to make as this question does not directly relate to the</p>

AEA's areas of expertise.
b) Are there any other practical considerations we should be aware of?
We have no comment to make as this question does not directly relate to the AEA's areas of expertise.
<p>Consultation Question 4. (Para 2.3.43): Are there any other functions that would benefit from a systematic approach to regional working?</p>
<p>The delivery of electoral registration and elections functions, or at least parts of them, could be considered for regional working if it was identified that significant and identifiable improvements would accrue. In doing so, however, there would be a need to ensure that the independence of the statutory officers, namely the Electoral Registration Officer (ERO) and the Returning Officer (RO), were not compromised and that any regionalisation did not introduce unacceptable risks that could detrimentally affect the transparency and security of the electoral process. Furthermore, with regard to the introduction of any new legislative innovations, it is strongly encouraged that the Welsh Government commits unequivocally to fully cost and then fund any and all additional administrative burdens placed on EROs or ROs that would result in the introduction of new models of regional working. Due regard would also need to be given to the geography of Wales in relation to how such regional working would operate in practice.</p> <p>Please also see our comments to question 7 below.</p>
<p>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.</p> <p>Do you agree or disagree? Why?</p>
<p>If Welsh Ministers were to mandate additional functions to be undertaken regionally that would either directly or indirectly affect EROs and ROs, we would expect that full and open consultation be undertaken in advance in order to avoid introducing unacceptable risks to the transparency and security of the electoral process.</p>
<p>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.</p> <p>Do you agree or disagree? Why?</p>
<p>We have no comment to make as this question does not directly relate to the AEA's areas of expertise.</p>
<p>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.</p> <p>Which services do you believe could best be organised and delivered these ways?</p>

Elements of the electoral registration function could potentially be considered for regional delivery as some local authorities in the UK operate shared electoral services, and in Northern Ireland, the Chief Electoral Officer deals with all registration and election matters.

Experience shows that great care must be taken when introducing such shared services, not least because of the expectations of locally-elected members and the need to ensure local knowledge in maintaining electoral registers.

Elections can also form part of a shared service but examples are less prevalent and, because of the technical nature of election delivery, greater risks are likely to be introduced in ensuring safe and secure delivery. The proposals outlined in the White Paper, with areas being able to choose between the “first past the post” and “single transferable vote” voting systems, may result in the differences being too complex for regional working and the economies of scale will be reduced if there is less consistency as a result of different voting systems in different local authority areas.

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?

At present, if an elector fails verification with DWP records at the application stage of registering to vote and the ERO is unable to data match against local authority records, the potential elector must provide documentary evidence before the ERO can continue to process their application.

Guaranteed access to other public data records would increase the data sets available for the ERO to verify against, which could mean that the applicant becomes registered without having to provide the documentary evidence.

In addition, access to wider data sets including public utility services data records such as electricity, gas and water would assist EROs in ensuring all those residents who are eligible to register are invited to register to vote in a more efficient manner than is often the case at present.

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

Provision needs to be made in legislation for EROs to have access to much wider data sets, including public utility services data or records such as electricity, gas and water or DVLA, UCAS or NHS records, and not just local authority data as at present.

c) What challenges does data sharing pose?

Three key challenges for EROs are:

- Gaining access to up to date and accurate public data as outlined above;
- The need to often enter into quite detailed data sharing agreements and the “barriers” presented by the Data Protection Act; and
- The data being in a format that is easy to use and compatible with their electoral management software system.

<p>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:</p> <ul style="list-style-type: none"> • 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). <p>a) Which do you believe would be most appropriate to best support regional working? Why?</p>
<p>We have no comment to make as this question does not directly relate to the AEA's areas of expertise.</p>
<p>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?</p>
<p>Scottish elections are overseen by an Election Management Board, which might be a model to consider for Welsh elections. Similarly, the Electoral Office for Northern Ireland manages electoral processes in Northern Ireland. It is worth noting that a fledgling Wales Electoral Co-ordination Board (WECB) does now exist which brings together the key stakeholders within the Welsh Electoral Community and could be a useful model to build on in terms of improved consistency in the delivery of future electoral events.</p>
<p>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.</p> <p>a) How can this joint governance and decision making best be achieved?</p>
<p>We have no comment to make as this question does not directly relate to the AEA's areas of expertise.</p>
<p>b) Is the larger economic footprint the right one?</p>
<p>We have no comment to make as this question does not directly relate to the AEA's areas of expertise.</p>
<p>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.</p> <p>a) What should the democratic accountability and scrutiny arrangements be for such a model?</p>
<p>Any model introduced needs to consider and respect the independence of EROs and ROs from local authority structures. In both instances, the responsibilities are personal to the officers appointed, not to the local authorities.</p>

<p>b) Should each participating Local Authority have equal voting rights or should they be weighted in some way?</p>
<p>We have no comment to make as this question does not directly relate to the AEA's areas of expertise.</p>
<p>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.</p>
<p>We have no comment to make as this question does not directly relate to the AEA's areas of expertise.</p>
<p>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.</p>
<p>a) What are your thoughts on the proposed mandatory economic development footprint for 'Joint Governance Committees'?</p>
<p>We have no comment to make as this question does not directly relate to the AEA's areas of expertise.</p>
<p>b) How could a framework approach for sub-regional working in other services areas operate in practice?</p>
<p>We have no comment to make as this question does not directly relate to the AEA's areas of expertise.</p>
<p>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?</p>
<p>We have no comment to make as this question does not directly relate to the AEA's areas of expertise.</p>
<p>d) How should the governance arrangements at the mandatory economic development 'Joint Governance Committees' have oversight of sub regional working?</p>
<p>We have no comment to make as this question does not directly relate to the AEA's areas of expertise.</p>
<p>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.</p>
<p>We have no comment to make as this question does not directly relate to the AEA's areas of expertise.</p>

<p>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.</p> <p>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?</p>
<p>We have no comment to make as this question does not directly relate to the AEA's areas of expertise.</p>
<p>b) Should the framework provide for a default position if local agreement cannot be reached, and how such a process might be triggered?</p>
<p>We have no comment to make as this question does not directly relate to the AEA's areas of expertise.</p>
<p>c) What further considerations might relate to, or need to be included in, a financial framework?</p>
<p>We have no comment to make as this question does not directly relate to the AEA's areas of expertise.</p>
<p>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.</p> <p>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?</p>
<p>In coming to a decision in this area, the Welsh Government will wish to consider the role of the independent Electoral Commission and its relationship with EROs and ROs, specifically in respect to the performance management framework.</p>
<p>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.</p> <p>Do you agree or disagree? Why?</p>
<p>We have no comment to make as this question does not directly relate to the AEA's areas of expertise.</p>
<p>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?</p>
<p>We have no comment to make as this question does not directly relate to the AEA's areas of expertise.</p>

SECTION 3

<p>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.</p>
<p>The processes applicable to boundary reviews undertaken by the Local Democracy and Boundary Commission for Wales are extremely robust, ensuring that full consultation is undertaken with those affected by merger reviews. We would however request that both the AEA nationally and the AEA branch for Wales be actively consulted on any such arrangements and details proposed in relation to elections.</p>

SECTION 4

<p>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.</p>
<p>We have no comment to make as this question does not directly relate to the AEA's areas of expertise.</p>
<p>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'.</p> <p>Do you agree? Why?</p>
<p>We have no comment to make as this question does not directly relate to the AEA's areas of expertise.</p>

SECTION 5

<p>Consultation Question 22. (Para 5.2.8): The Welsh Government believes there should be minimum expectations on Councillors for interacting with their local constituents.</p> <p>Do you agree or disagree? If so, what should these minimum expectations be?</p>
<p>We consider that any intervention to encourage voter engagement and reduce voter apathy is to be welcomed. However, at the same time, it is essential that Councillors are provided with the necessary and relevant information to ensure that any such intervention does not directly or indirectly adversely affect the registration of electors or the participation of voters in elections, and are made fully aware and accountable for the dissemination of misleading and/or incomplete information.</p>
<p>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.</p> <p>What do you believe these changes should be?</p>
<p>We have no comment to make as this question does not directly relate to the AEA's areas of expertise.</p>

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?

We have no comment to make as this question does not directly relate to the AEA's areas of expertise.

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?

We have no comment to make as this question does not directly relate to the AEA's areas of expertise.

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?

If a regional structure is introduced for the delivery of electoral matters, consideration will need to be given to the appointment of regional EROs and ROs alongside the requirement to provide them with the appropriate resources and staff to deliver their statutory functions. Welsh Government should fully commit to provide any additional resources required in delivering this type of new regional structure.

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

We have no comment to make as this question does not directly relate to the AEA's areas of expertise.

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.

Paragraph 7.1.1 “The National Assembly will be considering separately the potential for reforms to its elections. A more detailed consultation will take place later this year, subject to the Wales Bill being passed, on the details of reforms.”

We look forward to receiving the detailed consultation paper in due course but in the meantime provide the following comments, which we hope will be of

assistance.

Paragraph 7.1.2 “Proposals Welsh Government are likely to consider are:

- ***A review of postal voting procedures***

Whilst carrying out the review, the Welsh Government may wish to consider the Sir Eric Pickles report [“Securing the Ballot”](#) along with the Government’s response [“A Democracy that Works for Everyone: A Clear and Secure Democracy”](#).

- ***The use of all-postal elections***

Evidence shows that elections conducted on an all postal ballot basis is likely to increase turnout. However, the necessary safeguards to address potential electoral fraud and the misuse of votes would need to be considered extremely carefully. It would need to be recognised that the latter is likely to mean increased costs and additional time delays caused by the need to collect personal identifiers from all electors and the commensurate effect on checking processes when postal ballot papers are returned.

Whilst there is currently a voluntary code of conduct for political parties in terms of handling postal votes, if an election was to be conducted on an all postal basis, then legislation would need to be considered so that it became a criminal offence for political parties and/or activists to handle postal ballot papers rather than a voluntary code, which cannot be legally enforced.

- ***Electronic voting***

The use of IT for voting would replicate the way that some citizens generally conduct their business and interact with both private and public sector organisations. This is particularly the case in terms of young people.

However, whatever system of voting is used would have to be secure and gain public confidence. In an international context, it should be borne in mind that several jurisdictions have moved away from the use of electronic voting systems for a variety of reasons and, most recently, in response to concerns about “hacking”.

- ***Electronic counting of votes***

We generally support the electronic counting of votes so long as the system is secure, robust and produces an accurate and timely result. In our 2016 post-election report [“Pushed to the absolute limit - 2016: The electoral year never to forget”](#), we reaffirmed our previous recommendation that:

“The UK Government should consider allowing electronic forms of counting for the counts in respect of at least some of the polls where multiple polls are combined, for example at parish and town council elections.”

In light of result collation issues at the 2016 London Mayoral and Assembly elections, we also recommended that:

“The Greater London Authority should review the method of counting for

future polls, i.e. counting electronically versus a manual count as at other SV polls (PCC)."

- ***Voting at places other than polling stations***

We assume this statement refers to using premises such as places of worship or supermarkets in addition to or rather than more traditional premises such as a schools and community halls?

We have no comments other than a location designated as a polling place should be accessible, suitable for all eligible electors and be appropriate for them to cast their votes in secret.

- ***Proposals to hold elections on different days***

Our general view is that the polling day should remain as a weekday but we have no strong view on the need to retain it as a Thursday, as is currently the case for normal local government elections.

We consider that there are significant challenges associated with weekend voting, including:

- Resources – increased costs for staff and venue hire;
- Polling station venues – availability;
- Security – increased costs;
- Administration of elections – availability of sufficient polling station and count staff, ICT access, and count venues.

As an alternative to weekend voting, in some democracies, polling on a working day has been converted to a national public holiday.

- ***Local ROs/EROs trialling reforms in different ways better to meet the needs of different communities and locations***

We would like to see rigorous piloting of the proposed reforms outlined before any permanent legislative change is made. The pilots would need to be evaluated taking into account the costs, the perceived benefits and the voter experience.

However, we do have reservations with the notion that individual EROs and ROs are able to adopt whatever approach is best for their community/location as this will introduce inconsistency across Wales and neighbouring local authority areas, which could lead to voter confusion and increased apathy. During the evaluation of any such pilots, these issues will need to be considered, reviewed and taken into account. Please also see the comments under paragraph 7.1.12 below.

- ***Remove entitlement to personal fees of ROs***

We have significant concerns as to this proposal.

The RO is a unique position set out in legislation, deliberately designed to ensure independence of this role so that it can be delivered without fear or favour. This independence is set out by Section 27(1) of the Representation of the People Act 1983. The duties of the RO are defined in the appropriate legislation for each

election type, but include the following:

- The publication of all relevant statutory notices relating to the election, for example the Notice of Election and the Statement of Persons Nominated/Notice of Poll (if a poll is needed);
- The nomination process;
- The production, dispatch and verification of postal votes;
- The identification, booking and equipping of polling places;
- The recruitment, appointment, training and remuneration of Presiding Officers, Poll Clerks and other polling staff;
- The secure transfer of ballot boxes from polling places to the count venue;
- The verification and counting of the votes;
- The declaration of the results;
- Holding for public inspection relevant documentation around the election process, including candidates' election expenses.

These duties are the personal responsibility of the RO who is answerable directly to the courts for any question or failure in these duties. The RO is not responsible to the local authority, its elected members or the Welsh Assembly.

As an independent role, the liabilities are that of the individual, not the local authority. This is demonstrated in that it is the RO who is subject to election petitions within Part III of the Representation of the People Act 1983. Every RO should ensure that they have insurance for this very reason. If they are guilty of any act or omission in breach of their official duty then they are liable on summary conviction to a fine not exceeding £5,000. The fee can also be withheld for 'poor performance' at the poll.

As a consequence of this role being independent, it would be inappropriate for any salary for a job which has been evaluated without these roles and responsibilities to be considered as appropriate remuneration for being the RO.

The RO role is a complex and high profile position and it would be completely wrong for that person to not be appropriately remunerated for taking on this role, the associated personal liabilities and additional workload.

It would not provide the independence or the transparency that the public would expect if the RO was accountable to the very people they were ensuring were freely elected by the electorate.

Any remuneration for any position should be regularly reviewed and evaluated and that of the Returning Officer should also be the case.

Paragraph 7.1.3 “Welsh Government also intends to explore how a single electronic register for Wales might be developed. This would include looking at issues such as: data sharing, automatic voter registration, and greater access to register information by Local Authority staff.”

We look forward to receiving the detailed consultation paper in due course but in the meantime provide the following comments, which we hope will be of assistance.

Our responses to questions 7 and 8 above briefly outline our position in relation to a single electronic register and data sharing. You may also wish to note that in

our 2016 post-election report "[Pushed to the absolute limit - 2016: The electoral year never to forget](#)", we reaffirmed our previous recommendation that:

"The UK Government should carry out a review of IER processes, with a view to implementing legislative changes to improve processes which should include:

- *A registration process with less bureaucracy and registering as a single transaction until there is a change in personal circumstances.*
- *Change of address for a registered elector to be automatically dealt with through transactions between the relevant EROs.*
- *Joined up Government and better use of data as people move address, for example, registering for council services, council tax, DVLA, UCAS and NHS records could enable registration in a single transaction.*
- *The annual canvass should be replaced with, for example (and not limited to) one every five years ahead of each UK Parliamentary General Election along with EROs being authorised to run more often if they wish to or local circumstances dictate."*

Paragraph 7.1.4 "Welsh Government remains committed to moving to a five-year term for local government....."

We can see the benefit of moving to a five-year cycle as the current four-year cycle means that over time, there will always be a clash with UK Parliamentary general elections being held on the same day. This results in combined polls, which can cause voter confusion and added complexity to the conduct of those polls.

Paragraph 7.1.4 "We are considering a proposal to require candidates to make clear whether they were or are members of a registered political party, whether they were formally selected to stand for that party or not....."

As part of their nomination to stand using a description other than "independent", candidates already need to submit a form giving authorisation by the political party they are standing for.

This proposal appears to require every candidate to confirm political affiliation which, although potentially adding another factor into the consideration of nominations, does not appear administratively onerous.

Paragraph 7.1.12 "...As such, the Welsh Government proposes to make legislation which will allow Councils in Wales to decide which voting system best reflects the needs of their local people and communities. Local authorities will be able to use the 'First Past the Post' or the 'Single Transferable Vote' systems for elections to their Council. It will be for Councils themselves to make the choice of voting system for their own localities."

We have concerns that this proposed change will lead to an inconsistent approach across Wales with local authorities being able to choose their voting arrangements, which is likely to lead to confusion amongst voters when neighbouring local authorities could be voting in different ways at local government elections held on the same day.

This will also lead to mixed messages across the whole of Wales with different media campaign messaging.

Paragraph 7.1.1 states *“i.e. the system favours the strongest party locally and therefore does not reflect the preferences of voters across the area”*.

This approach of allowing Councils to choose the voting arrangements for their area would make it a political decision and would give the power to the strongest party within the local authority so in theory they could choose the system that favours them.

There is a similar issue in relation to local authorities being responsible for the review of polling districts and polling places and the influence political members have on the outcome of the polling scheme approved by local authorities. In our 2016 report “Pushed to the absolute limit - 2016: The electoral year never to forget” we reaffirmed the following recommendation for this reason:

“The selection of ‘polling places’ should be the responsibility of independent Returning Officers, rather than of local authorities.”

Paragraph 7.1.13 *“...If the Council decides to change electoral arrangements, it must use the new system for at least the next two whole Council (“ordinary”) elections which follow the decision. After two whole Council elections under the new electoral system, a Council will be able to switch back to the previous system if it chooses to do so.”*

We have concerns that this approach could lead to even more voter confusion and disengagement.

Paragraph 7.1.14 *“The Welsh Government does not intend to extend this option to Community Councils of the ‘Single Transferable Vote’ system at this time....”*

Community Council elections in Wales are combined with Welsh local government elections, therefore if a local authority changes to the ‘Single Transferable Vote’ system for their local government elections, there will be two voting systems on the same day which could lead to voter confusion given that the polls are combined.

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.

We have no comment to make as this question does not directly relate to the AEA’s areas of expertise.

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?

<p>We have no comments other than those already outlined in answering the above questions.</p>
<p>b) Could the proposals be re-formulated so as to increase the positive effects or reduce any possible adverse effects?</p>
<p>We have no comments other than those already outlined in answering the above questions.</p>
<p>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.</p>
<p>a) Are there any other positive or adverse effects not identified in the assessment?</p>
<p>We have no comments other than those already outlined in answering the above questions.</p>
<p>b) Could the proposals be re-formulated so as to increase the positive effects or reduce any possible adverse effects?</p>
<p>We have no comments other than those already outlined in answering the above questions.</p>
<p>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.</p>
<p>a) Are there any other positive or adverse effects not identified in the assessment?</p>
<p>We have no comments other than those already outlined in answering the above questions.</p>
<p>b) Could the proposals be re-formulated so as to increase the positive effects or reduce any possible adverse effects?</p>
<p>We have no comments other than those already outlined in answering the above questions.</p>
<p>Consultation Question 33. (Para 7.1.14): Please provide any other comments you wish to make on the content of this White Paper.</p>
<p>In addition to the above comments we would ask that the Welsh Government ensure that any changes in legislation relating to elections are made well in advance of the polls in which the changes will take effect. In our 2016 report: <i>“Pushed to the absolute limit: 2016 – the electoral year never to forget”</i>, we made the following recommendation:</p> <p><i>“Except in cases of unforeseen emergencies and proportionate to the need, changes to election law should not be applicable to any elections within a six-month period from the date the legislation comes into effect.”</i></p>