

Annex C: Consultation Questions

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**Introduction:**

**The Association of Electoral Administrators (AEA) was founded in 1987 and is the professional body representing the interests of electoral administrators in the United Kingdom.**

**This paper sets out the views of AEA (Wales) in relation to two specific questions (Questions 4 and 6) raised in the Welsh Government’s Green Paper – Strengthening Local Government – Delivering for People.**

**The AEA’s primary concern is about the effect of any proposed changes to the law which would impact on electoral registration and the administration of elections and which might arise as a result of the issues identified in the consultation paper.**

**Any such changes would need to be carefully considered in terms of the practical implications and the way in which the changes would be introduced and administered.**

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

**Chapter 3**

Consultation Question 1

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

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

**The Association of Electoral Administrators (Wales) does not hold a view on this matter.**

b) What are your views on the common elements to the process of mergers we outline in this section?
<b>The Association of Electoral Administrators (Wales) does not hold a view on this matter.</b>
c) What are your views on the options for creating fewer, larger authorities which we have set out?
<b>The Association of Electoral Administrators (Wales) does not hold a view on this matter.</b>
d) Are there other options for creating fewer, larger authorities we should consider?
<b>The Association of Electoral Administrators (Wales) does not hold a view on this matter.</b>
e) Do you have evidence on costs, benefits and savings of each option which can inform decision-making? If so, please provide details.
<b>The Association of Electoral Administrators (Wales) does not hold a view on this matter.</b>

<b>Chapter 4</b>
<u>Consultation Question 2</u> Chapter 4 has explained the need for clarity on the future footprint for local government and the range of factors which should be taken into account to determine a new configuration. It sets out a suggested future footprint for local government, which could be reached via each of the options set out in the previous chapter.
a) Do you agree that providing clarity on the future footprint of local government is important?
<b>The Association of Electoral Administrators (Wales) does not hold a view on this matter.</b>
b) Do you agree with the factors we have identified to inform our thinking? Would you change or add any?
<b>The Association of Electoral Administrators (Wales) does not hold a view on this matter.</b>

c) What are your views on the new areas suggested in this section?
<b>The Association of Electoral Administrators (Wales) does not hold a view on this matter.</b>
d) Do you have alternative suggestions and, if so, what is the evidence to support these as an alternative?
<b>The Association of Electoral Administrators (Wales) does not hold a view on this matter.</b>
e) In the context of these proposals, are there other ways we should simplify and streamline joint working arrangements at regional level and among public bodies within the new authority areas? If so, what are they?
<b>The Association of Electoral Administrators (Wales) does not hold a view on this matter.</b>

<b>Chapter 5</b>
<u>Consultation Question 3</u> Chapter 5 sets out the proposed approach to transition and implications for establishing Transition Committees and elections to Shadow Authorities under each option.
a) Do you agree with the proposed process of transition: namely establishing Transition Committees and ensuring elections to Shadow Authorities can be held ahead of vesting day for the new authorities?
<b>The Association of Electoral Administrators (Wales) does not hold a view on this matter.</b>
b) Do you agree that, if option 1 were pursued, we should set a date by which voluntary merger proposals should come forward in each electoral cycle?
<b>The Association of Electoral Administrators (Wales) does not hold a view on this matter.</b>
c) Do you have any other thoughts on the proposed process?
<b>The Association of Electoral Administrators (Wales) does not hold a view on this matter.</b>

Consultation Question 4

The consultation suggests holding any local government elections in June 2021.

Are there any reasons why June 2021 would not be a suitable date? If so, please suggest an alternative date with the reasons why that would be more suitable.

**The inclusion of this specific question within the Welsh Government’s latest consultation exercise has caused confusion and concern to Welsh electoral administrators.**

**Practitioners are bewildered as to why this proposal has been put forward in the middle of the current Welsh Assembly term and following on from the October 2016 Ministerial Statement from the previous Cabinet Secretary committing to a ten year period of stability for Local Government Elections and a permanent five year cycle (with the next elections taking place in 2022 and 2027 respectively).**

**On this issue the Association of Electoral Administrators (Wales) remains strongly opposed to the suggested alteration of the date of the next Local Government Elections from May 2022 to June 2021.**

**This is due to the level of risk and difficulty in administering complex and highly administratively demanding elections for both the National Assembly for Wales as well as ‘all out’ Local Government Elections (including polls for Welsh Community and Town Council Elections).**

**In submitting this response the Association of Electoral Administrators (Wales) supports and concurs with the detailed risks and impacts as outlined by the Electoral Commission in their assessment of this specific election date alteration for voters, electoral administrators and candidates and agents alike.**

**Essentially, there would be a risk in holding two significant elections in such close proximity to one another which would be multiplied if we also see various electoral reforms introduced for both elections at this time.**

**These include:**

- **Significant changes to franchise arrangements and the register**
- **Potential voting system reforms**
- **Campaign spending rules changes**

**Voters – Key Risks**

**There would be two voter registration deadlines which could lead to confusion for individual electors and possibly result in some people not registering in time, or indeed not registering at all;**

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

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

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

#### **Electoral Administrators – Key Risks**

**The complexity and workload for administrators in holding two elections in such close proximity during 2021 would be significant. In addition to this, if any changes to the franchise are agreed, administrators would be adapting to new systems and rules and so there would be an impact on the elections software and an increase in the support required by elections staff.**

**It should also be acknowledged that Returning Officers (ROs) and electoral administrators are faced with reduced resources and a growing number of skilled professionals who are leaving local authority elections teams.**

**ROs/Administrators are also increasingly reliant on a small pool of specialist software and print management suppliers. As such Welsh Government need to guarantee that Returning Officers and their staff are properly resourced to ensure that any relevant electoral events run successfully and that all new legislative burden costs are fully funded.**

**In taking any final decision on the timing of the forthcoming Local Government Elections the association strongly advises the Welsh Government to liaise closely with the Wales Electoral Co-ordination Board (WECB) at every stage of the process.**

**For reference purposes I have also outlined below the key mission statement and purpose of the Board which this association believes will play an increasingly key role in the co-ordination of future Welsh electoral administration amongst key stakeholders:-**

**The Wales Electoral Co-ordination Board (WECB) bring together Regional Returning Officers, UK and Welsh Government officials, Electoral Commission and AEA Wales to co-ordinate relevant events, electoral activity modernisation and reform in Wales.**

**Finally, the Association encourages the Welsh Government to engage holistically in their approach to the long term scheduling of future elections and electoral events moving away from looking at the timing of individual electoral events in ‘stand-alone’ isolation.**

**We also encourage Welsh Government to reference the Association’s post-election report (see link below) for the May/June 2017 polls to gain further understanding and access evidentiary first hand accounts of the experiences, pressure and stress created amongst the profession in administrating back to back electoral events.**

**[It’s time for urgent and positive Government action - The AEA’s review of the 2017 local government elections and the UK Parliamentary general election](#)**

Consultation Question 5

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

**The Association of Electoral Administrators (Wales) does not hold a view on this matter.**

Consultation Question 6

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

**The Association of Electoral Administrators (Wales) endorses the view of the Electoral Commission on this matter.**

**In determining the parameters of electoral reviews the Local Democracy and Boundary Commission for Wales will need to ensure that any reviews are concluded (and the proposals approved) sufficiently in advance of any poll that the boundaries will come into effect for, in order that administrators, candidates and parties are able to properly plan for the election based on the new boundaries.**

**In the event that Welsh Government decides to proceed with such a review programme we would strongly advise that they consult closely, and from an early stage, with the Local Democracy and Boundary Commission for Wales as well as the Wales Electoral Co-ordination Board and individual Electoral Registration Officers on a reasonable, proportionate and practical review timetable.**

**Chapter 6**

Consultation Question 7

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

**The Association of Electoral Administrators (Wales) does not hold a view on this matter.**

b) How could we better recognise the level of responsibility involved in being a local councillor? What changes to the remuneration and support councillors receive would enable a wider range of people to become involved in local democratic representation?
<b>The Association of Electoral Administrators (Wales) does not hold a view on this matter.</b>
<u>Consultation Question 8</u>
a) Are there other powers which local government should have? If so, what are they?
<b>The Association of Electoral Administrators (Wales) does not hold a view on this matter.</b>
b) Are there other freedoms or flexibilities which local government should have? If so, what are they?
<b>The Association of Electoral Administrators (Wales) does not hold a view on this matter.</b>
<u>Consultation Question 9</u>
a) Which areas offer the greatest scope for shared transactional services?
<b>The Association of Electoral Administrators (Wales) does not hold a view on this matter.</b>
b) How might such arrangements be best developed?
<b>The Association of Electoral Administrators (Wales) does not hold a view on this matter.</b>
<u>Consultation Question 10</u>
a) In ensuring we deliver a consistent approach across Wales, where consistency is important, how do you think the advice and support on each of these matters could be best provided?
<b>The Association of Electoral Administrators (Wales) does not hold a view on this matter.</b>
c) Are there any other challenges or opportunities from structural change or providing additional powers and flexibilities that have not been identified above? If these areas require support, what form should this support take?
<b>The Association of Electoral Administrators (Wales) does not hold a view on this matter.</b>

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

**The Association of Electoral Administrators (Wales) does not hold a view on this matter.**

Consultation Question 11.

We would like to know your views on the effects that the proposals within this consultation would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

a) What effects do you think there would be?

**The Association of Electoral Administrators (Wales) does not hold a view on this matter.**

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

**The Association of Electoral Administrators (Wales) does not hold a view on this matter.**

Consultation Question 12

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

**The Association of Electoral Administrators (Wales) does not hold a view on this matter.**

Consultation Question 13

The Children's Rights Impact Assessment published alongside the consultation outlines the Welsh Government's view of the effect of the proposals contained in the consultation on children and young people. The Welsh Government seeks views on that assessment.

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

**The Association of Electoral Administrators (Wales) does not hold a view on this matter.**

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

**The Association of Electoral Administrators (Wales) does not hold a view on this matter.**



Consultation Question 14

The Equalities Impact Assessment published alongside the consultation outlines the Welsh Government's view of the effect of the proposals contained in the consultation on protected groups under the Equality Act 2010. The Welsh Government seeks views on that assessment.

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

**The Association of Electoral Administrators (Wales) does not hold a view on this matter.**

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

**The Association of Electoral Administrators (Wales) does not hold a view on this matter.**

Consultation Question 15

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

**The Association of Electoral Administrators (Wales) does not hold a view on this matter.**