



REVIEW OF LOCAL GOVERNMENT ACT – PHASE 2

SUBMISSION TO ALL DISCUSSION PAPERS / TOPICS

Please accept this document as the formal submission from the Shire of Bridgetown-Greenbushes in relation to all eleven of the discussion papers / topics released as part of Phase 2 of the LG Act review process.

The submission template replicates the contents of the 11 online surveys posted on the website of the Department of Local Government, Sport and Cultural Industries.

This submission was endorsed by Council at its ordinary meeting held on 28 March 2019.

Opening Questions

1. Have you read the discussion paper associated with all of the surveys?
 - a. **Yes**
 - b. No

2. Who are you completing this submission on behalf of?
 - a. Yourself
 - b. **An organisation, including a LG, peak body or business**

3. What is the name of that organisation? **Shire of Bridgetown-Greenbushes**

4. What is your name? **N/A**

5. What best describes your relationship to LG?
 - a. Resident / ratepayer
 - b. **Staff member or CEO**
 - c. **Council member, including Mayor or President**
 - d. Peak body
 - e. State Government agency
 - f. Supplier or commercial partner
 - g. Community organisation

6. What best describes your gender?
 - a. Male

- b. Female
- c. Other
- d. Not applicable / the submission is from an organisation**

7. What is your age?

- a. 0 – 18
- b. 19 – 35
- c. 36 – 45
- d. 46 – 55
- e. 56 – 65
- f. 66 – 75
- g. 76+
- h. Not applicable**

8. Which LG do you interact with most? **N/A**

9. Would you like to be updated on the progress of the *LG Act 1995* review and further opportunities to have your say?

- a. Yes**
- b. No

10. Do you wish for your response to this survey to be confidential?

- a. Yes
- b. No**

11. What is your email address? [REDACTED]

Survey - Financial Management

12. To what extent do you support the following statements?

	Very unsupportive	Unsupportive	Neutral	Supportive	Very supportive
“LG purchasing rules should be consistent with the State Government.”				X Note 12(1)	
“Different procurement rules should apply to different LGs.”			X Note 12(2)		
“LGs with few staff or small operating budgets should have fewer procurement rules to comply with.”		X Note 12(3)			

Notes

12(1) - The current State Government threshold to require the calling of tenders is \$250,000 and a similar threshold should be set for all local governments. Clarification is also required on what timeline should be used to determine the need to call tenders if multiple purchases from the same supplier occur over a period of time. Informal guidance to the sector is that if such purchases exceed the tender threshold over a 3 year period then tenders should be called. This standard/requirement should be specified by Regulation.

12(2) – Council is aware there has been substantial discussion about setting tiered levels of compliance based on the size of a local government authority. If there is to be tiered levels of compliance the trade-off should be tiered levels of purchasing authority/financial management.

12(3) – Non-compliance or misappropriation of funds in a smaller Council is likely to have a larger impact on its operating budget than on a larger Council. Procurement is an area of significant risk to all organisations and clear unambiguous rules should apply across the sector.

13. **What criteria should be used to set the threshold for when a LG must publicly advertise a tender? (select all options that should apply)**

- a. **None. Procurement rules should be consistent across LG**
- b. A percentage of a LG’s average operating expenditure
- c. Salaries and Allowances Tribunal bands
- d. An independent risk assessment
- e. Other (please specify)

14. Should the regulations set a threshold that a CEO is permitted to spend without needing approval from council?

- a. Yes
- b. No**
- c. Unsure

The budget set by Council authorises the CEO to make the payments. All Councils should have purchasing or procurement policies to guide and authorise the CEO.

15. Should the amount that a CEO is permitted to spend without needing additional approval from Council be scaled according to the LG's size or capacity?

- a. Yes
- b. No**
- c. Unsure

The CEO should be operating within the Delegations and Policies adopted by Council, with purchasing determined by the budget. Purchases made within these confines should not need any further approval.

16. To what extent do you support the following statements?

	Very unsupportive	Unsupportive	Neutral	Supportive	Very supportive
"LGs should be permitted to invest surplus revenue."					X Note 16(1)
"LGs should have fewer restrictions on their ability to invest surplus revenue."			X Note 16(2)		
"Different LGs should have different investment powers and rules."				X Note 16(3)	
"Certain types of investments should require independent approval."		X Note 16(4)			

Notes

16(1) – Investment of surplus revenue is an important source of additional income. Local Governments should have an investment policy that sets limits on investments based on a risk assessment approach.

16(2) – There remains a need for restrictions on investment as the funds are public monies. However the risk should be determined by an appropriate Council investment policy.

16(3) – The need for different investment powers and rules across different local governments is supported. The applicable Council's Investment Policy will set the guidelines as to what they consider acceptable types of investments and their level of accepted risk.

16(4) – The Power to invest should be driven by the Council Investment Policy. A well informed policy will include safeguards to reduce the potential for loss through investment. Accordingly the requirement for independent approval of some investments is not supported.

17. *Should LGs be required to give public notice in any of the following situations? (please select all options that should apply)*

- a. **Where a LG wishes to borrow money outside amounts listed in the annual budget**
- b. Where a LG has exercised its power to borrow for a purpose but no longer wishes to use the funds for that purpose
- c. Where a LG has exercised its power to borrow for a purpose and has funding left over
- d. Public notice is not required in any of these situations
- e. Unsure

18. *Should LGs be permitted to secure loans using assets that they own freehold?*

- a. Yes
- b. No**
- c. Unsure

Shire assets are public (community) assets and shouldn't be at risk as security against a loan

19. *Should LG be permitted to participate in Building Upgrade Finance programs?*

- a. Yes
- b. No
- c. Unsure**

20. What types of upgrades should be eligible for the program?

- a. Environmental upgrades
- b. Commercial upgrades
- c. Both environmental and commercial
- d. Neither
- e. **Other (please specify)**

Council has insufficient knowledge of Building Upgrade Finance to offer comments on this question.

21. Do you have any additional comments on the topic of financial management?

1. Financial Ratios

The ratios utilised to evaluate a Council's performance should be subject to revision. Various ratios can be subject to manipulation through financial management and accordingly may not necessarily portray an accurate picture of a Council. They can have an unjustified negative affect on the Financial Health Indicator of a Council.

If the current set of ratios are retained a review of thresholds needs to occur as it is evident that most small to mid size local governments will never be able to achieve compliance with the base thresholds set for some ratios.

Survey - Rates, Fees and Charges

12. *To what degree are you concerned about rates?*

- a. **Not at all**
- b. A little
- c. A moderate amount
- d. A lot
- e. A great deal

13. *Do you support the following statements?*

	Yes	No	Unsure
“LGs should be required to prepare a Rates and Revenue Strategy each financial year.”		X	
“The value of the property should continue to be used to partially determine the value of the rates payable.”	X		
“LGs should be required to advertise all of their proposed rates and consider any submissions made, prior to adopting their budget.”		X	
“Under the <i>LG Act 1995</i> , LGs may not advertise their rates prior to 1 May. LGs should be permitted to advertise their rates at any time leading up to the adoption of their budget.”	X		
“All types of rateable property should pay the same rate in the dollar, regardless of how the land is used.”		X	

14. *Should the legislation set the rating categories that can be used by LGs?*

- a. Yes
- b. **No**
- c. Unsure

It should be up to the individual Councils as to how they differentiate their rates.

15. If rating categories are set in legislation, what would be appropriate categories?

	Yes	No	Unsure
Residential	X		
Rural residential	X		
Commercial	X		
Industrial	X		
Vacant	X		
Mining	X		
Mining - exploration and prospecting (separate from general mining)	X		
Farming	X		
Not-for-profit organisation or charity	X		

16. If rating categories were set in legislation, should LGs be permitted to introduce sub-categories within the set categories based on factors such as the type of mining being undertaken, the intensity of the land use or the type of commercial activity?

- a. Yes
- b. No
- c. Unsure

17. What powers should LGs have to recover payment of rates on exploration and prospecting leases?

Full power to recover from the lessee not owner of the land.

18. To what extent do you support the following statements?

	Very unsupportive	Unsupportive	Neutral	Supportive	Very supportive
“LGs should be permitted to rate properties differently based on their location.”				X	
“LGs should be permitted to rate long term vacant properties differently to land that is being used.”				X	
“LGs should be permitted to rate holiday houses, timeshare properties or AirBNB properties differently.”				X	
“A lower rate in the dollar should apply to land used for exploration and prospecting compared to land used for mining.”			X		

19. Currently, LGs are required to seek Ministerial approval when seeking to impose a rate in the dollar that is more than twice the lowest of its other rating categories. What is your preferred approach to differential rates?

- a. Ministerial approval for rates twice the lowest category
- b. Ministerial approval for rates three times the lowest category
- c. Ministerial approval for rates four times the lowest category
- d. No Ministerial approval required for any differential rates**
- e. Differential rates to a maximum of four times may be set with no option for Ministerial approval
- f. Other (please specify)

Local Governments should have autonomy to determine its own rating. The Shire of Bridgetown-Greenbushes has on occasions incurred delays to its annual budget process due to having to wait for Ministerial approval therefore it is recommended that this approval process be streamlined.

20. To what extent do you support the following statements?

	Very unsupportive	Unsupportive	Neutral	Supportive	Very supportive
“All land should be subject to rates.”				X Note 20(1)	
“The types of land subject to rates should be consistent between LGs.”				X	

Notes

20(1) - Subject to the LG being able to grant concessions.

21. Should the following types of land be subject to rates?

	Yes	No	Unsure
Land owned by the Crown that is used or held for a public purpose	X		
Land used or held exclusively for churches (religious bodies)	X		
Land used or held exclusively for schools	X		
Land used exclusively for charitable purposes	X		
Land vested in trustees for agriculture or horticultural show purposes	X		
Land owned by Co-operative Bulk Handling Limited (CBH)	X		
Land used primarily as a place of residence (no matter who owns the land)	X		

Land used for mining exploration or prospecting	X		
Aged care facilities	X		
Child care facilities	X		
Sporting clubs and Surf Lifesaving clubs	X		
Land used for the pursuit of the Arts	X		

22. Which of the following charges should be levied on properties exempt from rates?

- a. Waste charges
- b. A service charge to cover basic services and maintenance
- c. Both**
- d. Neither
- e. Other (please specify)

23. Should a concession on rates be granted in any of the following scenarios?

	Yes	No	Unsure
The land is owned by a person who currently receives a pensioner or health related concession		X	
The land is owned or used by a not-for-profit organisation	X Note 23(1)		
The land is owned or used by an entity that provides assistance or encouragement for arts or cultural development	X Note 23(1)		
The land is owned or used by a sporting or recreation body and is available for use by the general community without charge or below cost	X Note 23(1)		
Community service organisations that are not-for-profit, for the benefit of the general public and provide community services without charge or below cost	X Note 23(1)		
The payment of rates or charges will cause hardship to		X	

the land owner			
The concession will encourage the economic development of all or part of the LG district	X Note 23(1)		
The concession will encourage land that is of cultural, environmental, historic, heritage or scientific significance to the LG area to be preserved, restored or maintained	X Note 23(1)		
Land that is subject to a mining tenement	X Note 23(1)		
Land that is determined by the Minister to be subject to a concession	X Note 23(1)		

Notes

23(1) – All concessions should be at the discretion of the applicable Council.

24. *Should any other scenarios be subject to rates concessions?*

No there should be some legislative control on what concessions can be provided by a Council.

25. *Which of the following charges should be levied on that part of the land that receives a rates concession?*

- a. Waste charges
- b. A service charge to cover basic services and maintenance
- c. Both**
- d. Neither
- e. Other (please specify)

26. To what extent do you support the following statements?

	Very unsupportive	Unsupportive	Neutral	Supportive	Very supportive
“Rate exemptions for the commercial (non-charitable) business activities of charitable organisations should be removed.”					x
“Certain categories of ratepayers, for example Independent Living Units, should only be exempt from rates where they qualify under the Commonwealth <i>Aged Care Act 1997</i> .”					x
“Land used as a residence should not be regarded as charitable.”					x

27. To what extent do you support these statements?

	Very unsupportive	Unsupportive	Neutral	Supportive	Very supportive
“LGs should be able to impose fixed charges or levies for particular services, facilities or activities.”				x	
“LGs should be able to vary fees and charges at any time without advertising the change.”				x	
“LGs should have the autonomy to set fees and charges for all services they provide.”				x	
“Services that are consistent across LGs should	x				

	Very unsupportive	Unsupportive	Neutral	Supportive	Very supportive
have the same fees or charges.”					
“LGs should not set a fee or charge higher than the cost of delivering that service.”				X	
“A fee or charge should not be set lower than the cost of delivering that service.”		X Note 27(1)			
“Fees and charges imposed by LG and fixed under legislation should increase by CPI annually.”					X Note 27(2)

Notes

27(1) – Local Governments typically provide facilities and services such as swimming pools and leisure centres at a subsidised rate in recognition that ratepayers are already funding the provision of these services.

27(2) – Support for this suggestion is made on the condition that periodically a full review of the fee is to occur as CPI is not seen as a relevant fee escalation determinant for all services.

28. Do you have any additional comments on the topic of rates, fees and charges?

1. Local Government Fees & Charges Set by State Government

There are a number of fees and charges that are set by State legislation (planning, dog, cat, etc.) that are only reviewed periodically – compared to the State’s own fees and charges that tend to be reviewed annually. Either these fees need to be reviewed annually or local governments should be allowed to determine their own fees in these areas.

Survey – Beneficial Enterprises

12. *The LG sector has been requesting that it be given additional powers to form independent corporations. These entities could be used to manage part of a LG’s existing business activity or pursue new commercial opportunities. To what extent do you support the following statement?*

"A LG should be able to create a company known as a beneficial enterprise."

- a. Very unsupportive
- b. Unsupportive
- c. Neutral
- d. **Supportive**
- e. Very supportive

An initiative that enables a local government to participate in what are traditionally private sector activities risks blurring the clarity of function of ‘government’. At the same time, it can be acknowledged that governments have become involved in certain ways in trading activities. There is merit in considering increasing the scope for local governments to engage in ‘Beneficial Enterprises’, provided their core function is not compromised or lost sight of.

Beneficial Enterprises have the potential to offer benefits that ‘traditional’ LG cannot deliver. These potential benefits may be an ability to raise alternate sources of income, streamlined and less bureaucratic administration/operation (increased commerciality), and skilled boards and workforces with expertise in the specific operations of the Beneficial Enterprise.

13. To what extent do you support the following statements?

	Very unsupportive	Unsupportive	Neutral	Supportive	Very supportive
"There should be no limitations on a LG to create a beneficial enterprise."		X			
"Only LGs deemed to be a low risk should be allowed to create a beneficial enterprise."		X Note 13(1)			

"Only LGs that meet a threshold for financial health should be allowed to create a beneficial enterprise."		X Note 13(1)			
"LGs should only be permitted to invest in a company up to a specific percentage of their annual expenditure."				X Note 13(2)	
"Only LGs that are in band 1 & 2 of the Salaries and Allowance Tribunal banding should be allowed to create a beneficial enterprise."		X Note 13(1)			
"LG beneficial enterprises should be able to compete with private businesses."				X	
"Beneficial enterprises should have to employ staff under the same pay rates and conditions as employees of LGs."		X Note 13(3)			
"LGs should have to tell their community how much they are investing in a beneficial enterprise."					X
"Communities should be able to decide if their LGs can establish a beneficial enterprise."				X	

Notes

13(1) – It isn't the financial health of the local government that is relevant, it is the financial assessment/business case of the proposed enterprise.

13(2) –Limiting the maximum amount of expenditure that a local government can invest in a Beneficial enterprise would in effect limit exposure and risk.

13(3) – if the Beneficial Enterprise operates in the private sector, then it needs to be able to employ people in the same way as other businesses in the private sector employ people. Otherwise its ability to operate in the private sector may be compromised.

14. Which of the following functions should a LG beneficial enterprise be permitted to undertake?

	Agree	Disagree
There should be no restrictions		X Note 14(1)
LGs should not be permitted to form a company		X
Statutory approvals for example building and planning	X	
Leisure centres	X	
Human resources	X	
Information technology	X	
Airports	X	
Waste management	X	
Parking	X	
Road maintenance	X	
Retail (shops and service stations)	X	
Age or child care facilities	X	
Land development	X	
Caravan parks	X	
Other (please specify) Cemeteries, Shared Services, property management/building services,		

Notes

14(1) – Local Governments shouldn't be permitted to create a beneficial enterprise for financial services such as banking, lending, etc.

15. To what extent do you support the following statements?

	Very unsupportive	Unsupportive	Neutral	Supportive	Very supportive
"The LG should be required to guarantee any debt of a LG beneficial enterprise."		X Note 15(1)			
"The LG should be able to lend money to a LG beneficial enterprise."	X				
"The Western Australian Treasury Corporation should be able to lend money to a LG beneficial enterprise"					X
"Commercial lenders should be able to lend money to a LG beneficial enterprise"					X

Notes

15(1) – if a beneficial enterprise is going to be operated like a business, it may, like any other commercial business, fail and become insolvent. If the LG guarantees all of the beneficial enterprises' debts, then there seems little point in having one as it may as well just operate the activity under the structure of the local government.

16. To what extent do you support the following statements?

	Very unsupportive	Unsupportive	Neutral	Supportive	Very supportive
"The LG <u>must</u> receive approval from the Minister prior to creating a LG beneficial enterprise."				X	
"The LG <u>must</u> receive approval from the Treasurer prior to creating a LG beneficial		X			

enterprise."					
"The Office of the Auditor General should be responsible for auditing LG beneficial enterprises."					X
"A LG beneficial enterprise should be required to hold public meetings."		X			

17. Do you have any comments or feedback on the ability of a LG to form a beneficial enterprise?

Nil

Survey - Administrative Efficiencies

12. To what extent do you support the following statements?

	Very unsupportive	Unsupportive	Neutral	Supportive	Very supportive
“All LGs regardless of their size should have the same level of powers and responsibilities.”				X	
“The functions of the Grants Commission and the Advisory Board should be combined under one Board.”		X Note 12(1)			
“Membership of the LG Advisory Board and the LG Grants Commission should be required to be drawn from specific geographic locations, for example, metropolitan Perth as well as regional and remote Western Australia.”				X	
“Prior to conducting a poll to change the method of election of the Mayor/President from election by electors to election by the council, the LG should be required to draft the question and summaries and submit the question to the Advisory Board.”		X			
“The Advisory Board should not assess a proposal for changes to boundaries that does not meet the minimum requirements.”					X Note 12(2)
“The petition of affected electors should require each signatory to sign an acknowledgement that they have read the summary of the proposal and have seen a plan or map detailing any proposed changes.”				X	
“The affected LG(s) should be provided with a copy of the proposal prior to it being submitted to the Advisory Board.”				X	
“The applicant should be able to withdraw a proposal at any time prior to a recommendation being made to the Minister, providing there are circumstances which, in the Advisory Board’s view, warrant withdrawal of the proposal.”					X

Notes

12(1) – The LG Advisory Board and the LG Grants Commission perform distinctly different roles and members require a completely different skill set.

12(2) - With respect to a proposal to change boundaries, if the proposal does not meet the minimum requirements, then it should be returned to the proponent for completion, and not be accepted.

13. Currently a proposal to the Advisory Board from the community must be signed by 250 people or 10% of the community whichever is less. Should proposals from districts with a population over 5,000 be increased to 500 signatures?

- a. Yes
- b. No
- c. Unsure

14. To what extent do you support the following statements?

	Very unsupportive	Unsupportive	Neutral	Supportive	Very supportive
“People need the power to impound stray cattle.”	X Note 14(1)				
“LGs need the power to impound stray cattle.”				X	
“People need the power to detain and dispose of stray goats, pigs and poultry.”	X Note 14(1)				
“Offences that apply to pound keepers should also apply to similar facilities maintained by LGs, for example cats and dogs.”		X			

Notes

14(1) – Allowing private individuals to impound cattle and detain/dispose of goats, pigs and poultry could be abused due to poor neighbour relationships. The power to impound should rest with the duly authorized local government officer.

15. Which of the following pieces of information should be provided by LGs to the Department and the Minister for LG?

Section		Yes	No	Unsure
s 4.79	Provide a report on the result of an election (ordinary or extra-ordinary election)	X		
s 5.3	Advise of the failure to hold council meetings within the last 3 months	X		
s 7.12A	Provide a copy of the report that addresses the issues identified in the audit report	X		
LG (Audit) Reg 14	Provide a copy of the compliance audit report	X		
LG (Audit) Reg 15	Provide a certified copy of the compliance audit return	X		
LG (Constitution) Reg 11FA	Provide a report on the result of an election (election of Mayor/President and Deputy Mayor/President)	X		
LG (Constitution) Reg 11H	Advise the outcome of the Court of Disputed Returns (election of Mayor/President and Deputy Mayor/President)	X		
LG (Constitution) Form 2	Request for a poll on a recommended amalgamation	X		
LG (Elections) Reg 86	Advise the outcome of the Court of Disputed Returns (ordinary or extra-ordinary election)	X		
LG (Financial Management) Reg 33	Provide a copy of the annual budget	X		
LG (Financial Management) Reg 33A	Provide a copy of the review and determination of the reviewed annual budget	X		
LG (Financial Management) Reg 51	Provide a copy of the annual financial report	X		

16. Which of the following decisions should be made by the Minister?

Section		Yes	No	Unsure
s 2.25	Approval for a leave of absences greater than six consecutive council meetings		X	
s 3.53	Ordering which LG is responsible for managing a facility that is located within two or more districts (only when the LGs themselves do not agree about how to manage the facility)	X		
s 3.59	Commencing or undertaking a major land transaction or trading undertaking (as required under the regulations)	X		
s 3.61	Establishing a regional LG	X		
s 3.65	Amending the establishment agreement of a regional LG	X		
s 3.69	Establishing a regional subsidiary	X		
s 3.70	Amendment to a regional subsidiary's charter	X		
s 5.7	Reducing the number of people required for a quorum or absolute majority	X		
s 5.69	Approval to participate in a meeting (after disclosing an interest)	X		
s 5.69A	Exemption from some or all disclosure of interest requirements for committee members	X		
s 6.35	Minimum payment of rates on vacant land	X		
s 6.74	Approval to re-vest land to the State for non-payment of rates	X		
s 9.63	Direction to two or more LGs on how to resolve a dispute	X		

17. How should the following decisions be resolved by council?

Section		Simple Majority	Absolute Majority	Unsure
ss 3.12 & 3.16	Making local laws		X	
s 3.59(5)	Undertaking major land transactions or major trading activities		X	
s 4.17	Deciding if a councillor's seat should remain vacant prior to the next ordinary election (if the vacancy occurs between January and July in an election year)		X	
s 4.20	Appointing the Electoral Commissioner to conduct an election or appointing a returning officer		X	
s 4.57	Appointing a person to be a Councillor if no nominations are received twice for a vacant position		X	
s 4.61	Deciding if an election should be a postal election		X	
s 5.8	Establishing committees to assist council in the performance of powers and duties		X	
ss 5.10 & 5.11A	Appointing members (and deputies) to a committee	X		
s 5.15	Reducing the number of offices required to form a quorum at a committee meeting (if required)	X		
s 5.16	Delegating or revoking any LG powers and duties to a committee		X	
s 5.36	Decisions on CEO's employment contract		X	
s 5.42 & 5.45	Deciding to delegate powers or duties to the CEO (and revoke this delegation)		X	
s 5.54	Accepting the annual report for a financial year		X	
s 5.98A	Deciding to pay the deputy mayor an additional allowance		X	

Section		Simple Majority	Absolute Majority	Unsure
s 5.99	Deciding to pay council members the prescribed minimum fee or a fee within the prescribed range		X	
s 5.99A	Deciding to pay council members an annual allowance or an allowance that has been set for expenses		X	
s 6.2	Preparing and adopting a budget for the financial year		X	
s 6.3	Imposing a supplementary general rate or specified area rate		X	
s 6.8	Spending money from the municipal fund that was not in the annual budget		X	
s 6.11	Changing the purpose of a reserve account		X	
s 6.12	Granting a discount for the early payment of money, waiving or granting concessions, or writing off any amount owed to the LG	X Note 17(1)		
s 6.13	Deciding to require a person to pay interest on an amount owed to a LG	X		
s 6.16	Imposing (or amending) a fee for goods or services	X		
s 6.20	Deciding to borrow and spend borrowed money		X	
s 6.32	Imposing a general rate on rateable land or a supplementary general rate in an emergency	X		
s 6.46	Granting a discount or other incentive for the early payment of any rate or service charge	X		
s 6.47	Deciding to waive a rate or service charge	X		
s 6.51	Deciding to impose interest on a rate or service charge or costs of proceedings to recover amounts unpaid	X		

Section		Simple Majority	Absolute Majority	Unsure
s 7.1A	Appointing audit committee members		X	
s 7.1B	Delegating powers and duties to the audit committee		X	
Sch 2.2 clause 4	Deciding to propose to the Advisory Board that a submission should be rejected or dealt with as a minor matter that does not require public submissions	X		
Sch 2.2 clause 5	Making a proposal to the Minister or the Advisory Board to change the name of a district or ward		X	
Sch 2.2 clause 9	Making a proposal to the Advisory Board to change ward boundaries, the name of the district or wards, or the number of councillors		X	
LG (Admin) Reg 10(2)	Deciding to revoke or change a decision made by absolute majority		X	
LG (Admin) Reg 14A	Deciding to approve a member to be present at a meeting via telephone		X	
LG (Admin) Reg 19C and 19DA)	Adopting a strategic community plan and corporate business plan		X	
LG (Financial Management) Reg 33A	Determining whether to adopt a review of the budget or recommendations in the budget review		X	

Notes

17(1) – If this was to be an Absolute Majority decision the council wouldn't be able to delegate the writing off of minor amounts of money owed to the local government.

18. *Which regulatory measures within the Act should be removed or amended to make the legislation more efficient?* Please provide detailed analysis with your suggestions. Briefly describe the red tape problem you have identified. What is the impact of this problem? Please quantify if possible. What solutions can you suggest to solve this red tape problem?

Nil

19. Do you have any additional comments on the topic of local laws?

Nil

Survey - Local Laws

12. ***Should any of the following topics covered by local laws be replaced by state-wide regulations?***

	Yes	No	Unsure
Activities on thoroughfares and trading		X	
Beekeeping	X		
Cemeteries	X		
Dogs	X		
Cats	X		
Extractive industries		X	
Fencing			X
Bush fire brigades	X		
Meeting procedures (standing orders)		X	
Pest plants			X
Public places and LG property		X	
Parking	X		
Waste		X	
Urban environment and nuisance	X		
Other (please specify)			

13. ***Should model local laws be prepared by State Government for LGs to use?***

- a. **Yes**
- b. **No**
- c. **Unsure**

14. Should LGs be permitted to adapt the contents of model local laws?

- a. Yes
- b. No
- c. Unsure

15. Currently a LG is required to consult for a period of six weeks. If a LG adopts a model local law without modification, how long should the mandatory consultation period be?

- a. Less than 6 weeks
- b. Greater than 6 weeks
- c. **6 weeks as it is currently**
- d. The requirement for public consultation should be removed entirely
- e. A duration determined by council

16. If a LG is seeking to adopt a model local law that it has modified, how long should the mandatory consultation period be?

- a. Less than 6 weeks
- b. Greater than 6 weeks
- c. **6 weeks as it is currently**
- d. The requirement for public consultation should be removed entirely
- e. A duration determined by council

17. To what extent do you support the following statements?

	Very unsupportive	Unsupportive	Neutral	Supportive	Very supportive
“The Department should continue to provide comment on proposed local laws prior to consideration by Parliament’s Joint Standing Committee on Delegated Legislation.”					X
“LGs should be required to modify proposed local laws according to the instructions of the Department.”				X	
“LGs should be required to have a legal practitioner certify that a local law is within power and legally enforceable.”		X Note 17(1)			

Notes

17(1) – This would add significant costs for the local government. Currently a local government is able to seek legal advice on a local law proposal.

18. *Should LGs be required to periodically review their local laws?*

- a. No
- b. Yes, every 6 years or less
- c. Yes, every 8 years
- d. **Yes, between 8 and 10 years**

19. *Do you have any additional comments on the topic of local laws?*

Yes, the Joint Standing Committee on Delegated Legislation requires that any of its correspondence is not to be disclosed. For a Council to be fully informed as to whether to provide any undertaking which the Committee has required, it must be aware of the Committee's concerns and reasoning. It is unclear why the contents of such correspondence need to be confidential and making it so contradicts the practice of open and accountable governance.

Survey - Council Meetings

12. To what extent do you support the following statements?

	Very unsupportive	Unsupportive	Neutral	Supportive	Very Supportive
“The process for public question time should be consistent between councils.”		X Note 12(1)			
“Public question time is an important feature of council meetings.”					X
“People unhappy with the quality of the answer given at public question time should be able to escalate the matter to an independent person.”	X				

Notes

12(1) – Current legislation dictates that a public question time must be held. Subject to a council meeting the minimum requirements of the Act or Regulations it should be free to develop its own policy to guide public question time.

13. *Should council members be able to participate in meetings remotely?*

- a. Yes
- b. No
- c. Unsure

If yes, how?

By any means of instantaneous communication, such as telephone, skype, video conferencing. There must however be justifiable reasons for a member to participate remotely, such as the member not being present within 100km or 200km of the meeting place. The current requirement that the member attending remotely must be in a townsite should be removed as the standard of telecommunications is not solely determined by this type of location.

Perhaps the legislation should determine the broad parameters for remote attendance and allow Councils to adopt their own policy stipulating the circumstances where a member can attend remotely. There shouldn't be a requirement for the member to obtain the approval of Council as the legislation and Council policy should clearly set out these circumstances.

14. Could General Electors Meetings be combined with or held consecutively with an Ordinary Council Meeting?

- a. Yes
- b. **No**
- c. Unsure

General Electors Meetings should not be held at all due to there being a number of various opportunities for the public to engage with Council.

15. Should Council Meetings be live streamed?

This should be optional at the discretion of each Council, noting resourcing and technical issues may exist in some LGs / areas.

16. To what extent do you support the following statements?

	Very unsupportive	Unsupportive	Neutral	Supportive	Very supportive
“Legislation should set rules for recording confidential items in minutes.”				X	
“LGs should be required to publish unconfirmed council meeting minutes prior to the LG’s next council or committee meeting.”				X	
“The CEO rather than the Presiding Member should be responsible for the minutes of council and committee meetings.”				X Note 16(1)	
“The rule concerning council’s ability to revoke or change a decision should be amended to clarify that it only applies to decisions that are yet to be implemented.”					X

Notes

16(1) – The taking of minutes is an administrative function and therefore should be the responsibility of the CEO or an officer nominated by the CEO.

17. To what extent do you support the following statements?

	Very unsupportive	Unsupportive	Neutral	Supportive	Very supportive
“The requirement to hold an annual electors meeting should be removed.”					X
“The ability to call a special electors meeting should be removed.”	X				
“The number of times that a special electors meeting can be called on the same matter should be restricted.”		X			
“The number of electors required to hold a special electors meeting should be increased.”					X Note 17(1)
“The LG’s standing orders should apply to special electors meetings.”		X Note 17(2)			
“The way special electors meetings are conducted should be uniform between LGs.”		X Note 17(2)			

Notes

17(1) - It should be increased to 500 electors or 10% of the population, which ever is the lesser.

17(2) – Using the Council’s Standing Orders would introduce a sense of formality and limitation that may not be appropriate for an electors meeting. Restricting the number of times a person may speak, requiring persons to speak either for or against a motion, etc. may prove to be too limiting for electors that have no experience with meeting procedures. Instead the presiding member can determine the rules that will apply, with one option available being to use the Council’s standing orders.

18. Do you have any additional comments on the topic of council meetings?

Nil

Survey – Interventions

12. **Depending on the nature of the allegation, different parties are responsible for receiving allegations of breaches of the Act. Should the Department responsible for LG be responsible for receiving all allegations of breaches of the Act?**

- a. Yes
- b. No
- c. Unsure

Maintain the current position. Division 9 of Part 5 LGA: sections 5.102A – 5.125) deals with Councillors, in terms of minor and major breaches.

The current process is comprehensive and transparent, whilst retaining flexibility to deal with each case efficiently on its merits.

All complaints are forwarded to the Department, so there is independence of scrutiny.

13. **To what extent are you concerned about behaviour and good governance in LG?**

- a. A great deal
- b. A lot
- c. **A moderate amount**
- d. A little
- e. Not at all

14. **To what extent do you support the following statements?**

	Very unsupportive	Unsupportive	Neutral	Supportive	Very supportive
“The Act should enable an external person to be appointed to work with a LG’s administration to improve governance and resolve problems.”				X	
“An external person appointed to work with a LG’s administration to improve governance and resolve problems should have the powers to direct the administration and override decisions made by the administration.”	X Note 14(1)				
“The external person should be appointed by the					X

	Very unsupportive	Unsupportive	Neutral	Supportive	Very supportive
Minister.”					
“The costs of appointing an external person to work with an administration to improve governance and resolve problems in a LG should be met by the LG.”				X Note 14(2)	
“The costs of appointing an external person to work with an administration to improve governance and resolve problems in a LG should be met by the State Government.”		X Note 14(2)			

Notes

14(1) – Currently under S 5.41 LGA one of the functions of the CEO is to manage the day to day operations of the local government. What would be the status of the appointed person, can he/she direct the CEO and staff? The appointed person should have advisory status only and shouldn't be taking on all or some of the powers of the CEO. The appointed person should be able to make recommendations to the Council and/or CEO and the Council/CEO should maintain a record of if and how these recommendations are implemented. The appointed person would presumably report to the Minister either on nominated intervals and/or at the end of the appointed person's term and the Minister will be able to determine if a further term is necessary.

14(2) - The determination on whether the State Government or local government pays the costs of the external (appointed) person should be determined after the external person has made his/her final report to the Minister. If the report concludes that significant changes are required at the local government level to improve governance then the local government should be required to meet the costs. If the external person determined that there was little or no improvement required, then the State Government should pay. At the end of the process there would have to be a discretionary decision by the Minister on who is to pay. Taking into account budget constraints if the local government is determined responsibility to pay it should be given a period of 12 months to make such payment so that the expenditure can be included in the next annual budget.

15. To what extent to you support the following statements?

	Very unsupportive	Unsupportive	Neutral	Supportive	Very supportive
"The Act should enable an external person to be appointed to work with council members to improve governance and resolve problems."				X	
"An external person appointed to work with council members should have the power to direct the council."		X Note 15(1)			
"An external person appointed to work with council members to improve governance and resolve problems should have the powers to override council decisions."	X				
"An external person should be appointed by the Minister."					X
"The costs of appointing an external person to work with council members to improve governance and resolve problems in a LG should be met by the LG."				X Note 15(2)	
"The costs of appointing an external person to work with council members to improve governance and resolve problems in a LG should be met by the State Government."		X Note 15(2)			

Notes

15(1) - Appointing an external person is a significant imposition into the Council's autonomy and role as an elected body. The role of the external person should be advisory and as a mentor not as a decision maker. It should therefore be sufficient for the person to make recommendations to the LG as to how to address the identified matters. The Council must then take responsibility for considering and deciding what to do.

At the end of the appointed person's term, they should prepare a Report for the Minister, in respect of the matters for which they were appointed and also in respect of any other matters of concern they identified during the course of their work. The Minister would then be in a position to determine where a further appointment (of an external person) is required, or whether to proceed to an inquiry under other powers, or whether to suspend the council and appoint a commissioner.

15(2) – Refer comments at 14(2).

16. To what extent do you support the following statements?

	Very unsupportive	Unsupportive	Neutral	Supportive	Very supportive
“Former LG council members, committee members and employees should be prosecuted if they misuse information.”				X Note 16(1)	
“LG council members, committee members or employees should be prosecuted if they use their position to cause detriment to the LG or any person.”		X Note 16(2)			
“People who knowingly provide false or misleading information to a council should be prosecuted.”			X		
“LG employees that breach procurement rules should be prosecuted.”		X Note 16(3)			
“When a breach of the Act is identified an infringement notice should be issued as is the case for traffic offences.”	X				

Notes

16(1) – The former member or employee would have been subject to action if still in that role. If the information being misused was obtained whilst a member or employee the same consequences should apply as if they were still in either of these positions.

16(2) – Proving “detriment” in a prosecution may be subjective.

16(4) - Where procurement rules are breached, prosecution should be limited to where it is grossly negligent, intentional or repeated. The CEO (or in the case of the CEO, the Council) can remove delegated authority, or using employment law can warn or dismiss an employee for breaching procurement rules.

17. To what extent do you support the following statements?

	Very unsupportive	Unsupportive	Neutral	Supportive	Very Supportive
“In cases where a local law does not define a penalty amount, the Act should set a default penalty amount.”		X Note 17(1)			
“LGs need greater powers to direct property owners to tidy property for amenity, health and safety reasons.”					X
“LGs need greater powers to direct property owners and occupiers to remove items like disused motor vehicles for amenity, health and safety reasons.”					X
“LGs should be able to destroy property or items removed from a property within 28 days when there has been a breach of a local law or regulations. This might include rubbish, goods deemed to be of little value, or decaying items.”			X		

Notes

17(1) – The Local Law should define the penalty amount.

18. Do you have any additional comments on this topic of interventions?

Nil

Survey – Integrated Planning and Reporting

12. To what extent do you support the following statements?

	Very unsupportive	Unsupportive	Neutral	Supportive	Very supportive
“Long-term and operational planning is an area where reform is required.”		X Note 12(1)			
“A LG should be free to conduct its long-term and operational planning in whatever manner it wishes.”		X Note 12(2)			
“LGs should conduct their long-term and operational planning in the same way.”		X Note 12(2)			
“LGs with smaller populations and fewer staff should have fewer rules for how they conduct long-term and operational planning.”		X Note 12(2)			
LGs with larger populations and more staff should have fewer rules setting how they conduct long-term and operational planning.”		X Note 12(2)			
“Integrated Planning and Reporting documents need to be reviewed too frequently.”		X Note 12(3)			
“The timelines for reviewing Integrated Planning and Reporting documents need to be synchronised with council election cycles.”			X Note 12(4)		
“There should be consequences for not complying with Integrated Planning and Reporting requirements.”				X	

Notes

12(1) - Overall the current framework is satisfactory.

12(2) - Long term and operational planning timelines and methods can differ across the sector. There should be a statutory requirement for every local government to at least have a Strategic Community Plan, Corporate Business Plan, Long Term Financial Plan and Asset Management Plan(s) but the structure of these plans must be for the local government to determine.

12(3) - Current review timeframes determined to be appropriate.

12(4) – The Strategic Community Plan is reviewed every 2 years therefore most Council members will participate in a review twice during their 4 year term. There are arguments for and against deferring a review until after an election and it should be left to the Council to determine the timing.

13. Should Integrated Planning and Reporting requirements differ based on any of the following criteria?

	Yes	No	Unsure
Population size		X Note 13(1)	
Geographical size		X	
Location		X	
Salaries and Allowances Tribunal banding		X	
Other, please specify. <ul style="list-style-type: none"> • cultural diversity; • capacity to deliver 		X	

Notes

13(1) - There should be a statutory requirement for every local government to at least have a Strategic Community Plan, Corporate Business Plan, Long Term Financial Plan and Asset Management Plan(s) but the structure of these plans must be for the local government to determine.

14. To what extent do you support the following statements?

	Very unsupportive	Unsupportive	Neutral	Supportive	Very supportive
“LGs should be required to publish measures of success in implementing their long-term and operational plans.”				X Note 14(1)	
“LGs should be required to publish measures of success against uniform key performance indicators.”			X Note 14(2)		
“It is important that measures of success are comparable.”			X Note 14(2)		
“LGs should determine if they publish measures of success and what these measures should be.”				X	

Notes

14(1) – Yes – in the Annual Report.

14(2) – It would depend on what the “uniform key performance indicators” were. There is significant diversity between the local governments in Western Australia such as in population, geographical size, number of employees, etc. It may prove difficult to determine comparable performance indicators.

15. To what extent do you support the following statements?

	Very unsupportive	Unsupportive	Neutral	Supportive	Very supportive
“The State Government should use LG Integrated Planning and Reporting documents to inform policy and service delivery.”		X Note 15(1))	

	Very unsupportive	Unsupportive	Neutral	Supportive	Very supportive
“All LG plans, including Local Public Health Plans, Disability Access Plans and Town Planning Schemes, should be combined under Integrated Planning and Reporting.”		X Note 15(2)			
“LG Integrated Planning and Reporting needs to be conducted at a regional level to influence State Government policy and service delivery.”		X Note 15(1)			

Notes

15(1) – Whilst State Government agencies should be encouraged to have regard to local government integrated planning framework there shouldn't be a compulsion for the agency to ensure their policy and service delivery complies with those documents. Neither however should a local government's integrated planning be required to factor in State Government policy into its integrated planning.

15(2) - Decisions regarding the documents that are to be included in IPR (as informing documents) should be at the discretion of each local government. IPR guidelines provide sufficient advice regarding the nature of informing documents that should be included in IPR.

16. What should the role of the community be in Integrated Planning and Reporting?

	Yes	No	Unsure
(i) To be actively involved in the development of the Strategic Community Plan	X		
(ii) To provide feedback to the LG on Draft Strategic Community Plans and Corporate Business Plans	X		
(iii) To be notified of a LG's plans and reports (for example, publication of these documents on the LG's website)	X		
(iv) To assess the LG's success in achieving the priorities identified in the Strategic Community Plan		X Note 16(1)	

Notes

16(1) – How would such an assessment occur?

17. Should all LGs have to meet the following community engagement requirements when developing their IPR documents?

	Yes	No	Unsure
A minimum number of people or percentage of people involved in the engagement process		X	
Ensure that community engagement is representative of the community's diverse population		X	
Demonstrate the community has been engaged in the development of plans	X		
Demonstrate the community has been consulted on the completion of draft plans	X		
Other (please specify)	Nil		

18. Should community engagement requirements be the same for all LGs?

- a. Yes
- b. No**
- c. Unsure

Comment/Note:

How and when a local government engages with its community needs to be determined by the local government other when there is a statutory requirement for consultation.

19. Do you have any other comments on the topic of Integrated Planning and Reporting?

Nil

Survey - Community Engagement

12. **What methods of engagement do you believe are most effective (please select all options that apply)**

- a. In person
- b. Telephone
- c. Online
- d. Community forums
- e. Citizen juries
- f. Other (please specify)

13. **How could LGs engage with different community groups (e.g. young people, seniors, families, people with disabilities, Aboriginal people and people from Culturally and Linguistically Diverse Communities, etc.)?**

Determine how these groups wish to engage. A local government can no longer rely on traditional community engagement techniques such as advertising and public meetings.

14. **To what extent do you support the following statements?**

	Very unsupportive	Unsupportive	Neutral	Supportive	Very supportive
“The Act needs to set rules for community engagement by defining what community engagement is and how it should be done.”		X Note 14(1)			
“LGs should be required to adopt a community engagement charter or policy.”				X Note 14(2)	
“All LGs should operate under a universal community engagement charter or policy.”		X			
“LGs should determine if they require a community engagement charter or policy and the content of that charter or policy.”				X Note 14(3)	

Notes

14(1) – How and when a local government engages with its community needs to be determined by the local government other than when there is a statutory requirement for consultation.

14(2) - The DLGSC could develop a model Customer Service Charter which can be modified by individual local governments.

14(3) – This is a decision for each local government to make.

15. *Other jurisdictions have included principles with their engagement charter. How relevant do you believe each of these principles are?*

	Irrelevant	Neutral	Relevant
Engagement is genuine			X
Engagement is inclusive and respectful			X
Engagement is fit-for-purpose			X
Engagement is informed and transparent			X
Engagement processes must be reviewed and improved			X

16. *In what circumstances should LGs be required to engage with the community? (please select all options that apply)*

- a. When preparing or reviewing their Strategic Community Plan**
- b. When preparing their annual budget
- c. Making a local law – as is statutorily required**
- d. Planning matters – as is statutorily required**
- e. Emergency and community infrastructure planning
- f. Only when the LG determines that it is necessary
- g. Other (please specify) – Proposed changes to council policy that impact all or part of the community, significant changes to service delivery, business planning.**

17. *Would you like to make any further comments regarding community engagement?*

Nil

Survey - Complaints management

12. **What matters need to be considered in complaints management policies and procedures (please select all that apply)**

- a. How the application must be made
- b. How a response to a complaint is to be made
- c. Opportunities for a review of a response - Ombudsman
- d. The timeframes related to the process or review
- e. Notification requirements of the process
- f. Reporting of the complaints received
- g. Internal independent review of complaints
- h. None of these options
- i. Other (please specify) –

13. **To what extent do you support this statement?**

	Very unsupportive	Unsupportive	Neutral	Supportive	Very Supportive
“A customer service charter should set the framework for LG complaints management.”			X		

14. **Should a LG customer service charter be a legislative requirement?**

- a. Yes
- b. **No**
- c. Unsure

15. **Who should review unresolved complaints (please select all options that apply)?**

- a. Different staff member in the LG
- b. A qualified complaints management officer
- c. **A committee created by the LG**
- d. A tabled decision for council to determine
- e. None of the people or groups listed above
- f. **Other (please specify) –**

Comment/Notes:

- A complaints committee shouldn't have to be a formal committee under the Local Government Act. Instead it should be up to the local government to determine the make-up and tasks of complaints committee/panel.

- A person dissatisfied with the response to their complaint can choose to refer the matter to the Ombudsman.

16. Do you have any additional comments on the topic of complaints management?

1. The Act should provide a clear definition of a complaint.
2. The Act should require LGs to develop a policy including a process for dealing with complaints and an avenue for review or appeal.
3. Departmental guidelines will be beneficial to outline what is required within the policy, as a minimum, with recognition that all aspects of the Standard may not be able to be adopted by smaller councils.

Survey - Elections

12. *To what extent do you support the following statements?*

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree
"Voting should be compulsory."	X				
"Voting should be conducted via a preferential voting system."	X				
"Electronic and online voting should be made available for LG elections."				X	
"The use of electronic or online voting would not change my confidence in the voting system."			X		
"Legislation should be introduced that would permit online voting to be trialled."				X	

13. *Which LGs should be required to offer postal voting?*

- a. Postal voting should not be required to be offered –
- b. All LGs
- c. LGs with a population greater than 1,000 people
- d. Unsure

14. *Which LGs should be required to use the WA Electoral Commission?*

- a. No LGs should be required to use the WA Electoral Commission
- b. All LGs
- c. LGs with a population greater than 1,000 people
- d. Unsure

15. *Should the WA Electoral Commission be the only organisation authorised to conduct LG postal voting?*

- a. Yes
- b. No
- c. Unsure

Local Governments should have the option to run their own election or use another appropriate means.

16. What method should be used to resolve ties in council elections?

- a. Drawing of lots (random selection)
- b. Unsure
- c. Other (please specify) –

17. To what extent do you support the following statements?

	Very unsupportive	Unsupportive	Neutral	Supportive	Very supportive
“A count-back from the previous election result should be used if available to fill vacancies between elections.”	X				
“LGs should be required to adopt a caretaker period that restricts council from making major decisions during a LG election period.”				X	
“Caretaker periods are only required in large LGs.”		X			
“Council members who contest a State or Federal election should be required to take a leave of absence on the day of their nomination for a State or Federal election campaign.”					X

18. To what extent do you agree with the following statements?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree
“People who have been convicted under planning or building legislation offences in the past should be disqualified from serving as a council member.”		x			
“Council elections should be held every four years rather than every two years with all council members being elected at the same time.”	x				
“A cap should be set on the maximum amount that a candidate may spend on their campaign.”			x		
“Prospective candidates should be required to declare their profession or primary source of income on the nomination form.”			x		
“LGs should be required to publish candidate profiles on the website.”				x	
“Information collected on the nomination form should include demographic information such as gender and ethnicity.”			x		

19. To what extent do you agree with the following statements?

	Very unsupportive	Unsupportive	Neutral	Supportive	Very Supportive
"People who own land but who do not live in a district should be eligible to vote."				X	
"People who lease rateable property in a district should be entitled to vote."				X	
"Corporations that own property in a district should be entitled to vote."				X	
"Corporations that lease property should be entitled to vote."				X	
"Occupiers of land, for example, commercial lease holders, should be eligible to vote."				X	
"Only people over the age of 18 who live in a district should be eligible to vote."	X				

20. How should the position of Mayor or Shire President be determined?

- a. Vote by electors
- b. Vote by council members -
- c. A method determined by council**
- d. Unsure
- e. Other (please specify)

21. To what extent do you agree with the following statements?

	Very unsupportive	Unsupportive	Neutral	Supportive	Very supportive
“The rules regulating non-election gifts and elections should be aligned.”				X	
“Election gifts and donations should be declared regardless of when they are received.”				X	
“A register of election gifts and donations should be available online.”				X	
“Donors should also be required to declare election gifts and donations made.”		X			

**22. Should gifts or donations from any of the following be prohibited?
(please select all options that apply)**

- a. Real estate agents
- b. Property developers
- c. Political parties
- d. Liquor or gambling business entities
- e. Tobacco industry business entities
- f. No election gifts or donations should be prohibited**
- g. All election gifts or donations should be prohibited
- h. Other (please specify)

23. To what extent do you support the following statements?

	Very unsupportive	Unsupportive	Neutral	Supportive	Very Supportive
“A LG should be required to have a ward structure if it reaches a certain population threshold.”		X			
“A LG with fewer than 800 people should not have wards.”		X			
“Ward boundaries should be set by the Electoral Commissioner.”	X				
“The number of members that a council has should be linked to the LG’s population.”		X			

24. How can participation be increased to ensure that Western Australia’s diverse population is represented in LG?

Promote the merits of being a Council Member.

25. Do you have any other comments or feedback on LG elections?

Employees who have been dismissed or have been previously employed by the LG (Administration) should not be eligible to run for Council for at least one election cycle.

End of Submission.
