



Department of
**Local Government, Sport
and Cultural Industries**



Local Government Act 1995 review
Agile • Smart • Inclusive

Local Government Act 1995 **Review**

Agile • Smart • Inclusive – Local governments for the future

Phase 1: Consultation Paper

8 November 2017

Name: Tim Green

1. Relationships between council and administration

Introductory questions

- 1) Would you like your submission to remain anonymous?
No
- 2) Postcode:
6025
- 3) Who are you submitting on behalf of?
Yourself
- 4) Local government name:
- 5) Organisation name
- 6) Are you a:
Other

Defining the roles of council and administration: Guidance questions

- 7) How should a council's role be defined? What should the definition include?
- 8) How should the role of the CEO and administration be defined?
- 9) What other comments would you like to make on the roles of council and administration?
- 10) Are there any areas where the separation of powers is particularly unclear?
- 11) How do you propose that these are improved?

Improving relationships between council and administration: Guidance question

12) Do you have any other suggestions or comments on this topic?

2. Training

2.1 Competencies required to be an elected member

Elected member competencies: Guidance questions

- 13) What competencies (skills and knowledge) do you think an elected member requires to perform their role?

I think they need to fully understand good governance. A basic understanding of statistics (sample size, stratification and bias) to understand community consultation is important. They need basic financial literacy to read a budget. They need a good command of English to be able to read and understand policies and legislation.

I do not believe they need extensive training in the job providing they are over 25 and have had a job before. At the end of the day, it is the communities responsibility to elect competent people, not the taxpayers or ratepayers job to remedy their deficiencies. There is no god-given right to be elected!

- 14) Do these vary between local governments?

No

- 15) If so, in what way?

2.2 Funding training

Funding training: Guidance questions

- 16) Who should pay for the costs of training (course fees, travel, other costs)?

I think they should pay themselves, they are not likely to be in office long enough to warrant ratepayer funds being used, although it does depend on the extent of the training required.

- 17) If councils are required to pay for training, should a training fund be established to reduce the financial impact for small and regional local governments?

No

- 18) Should contribution to such a fund be based on local government revenue or some other measure?

Do you have any other suggestions or comments on this topic?

I would hope the local government authority could deliver the necessary training in governance, risk, financial management etc. There is a small risk that an incompetent local authority could deliver inadequate training, but that should be picked up by audit.

2.3 Mandatory training

Mandatory training: Guidance questions

19) Should elected member training be mandatory?

No

20) Why or why not?

I think there should be mandatory assessment of basic competency. The training should come off that. There's no point teaching someone who has been a chartered accountant how to read a budget for instance.

21) Should candidates be required to undertake some preliminary training to better understand the role of an elected member?

No

22) Should this be Compulsory?

No

23) Should prior learning or service be recognised in place of completing training for elected members?

Yes

24) If yes, how would this work?

I think there should be mandatory assessment of basic competency. The training should come off that. There's no point teaching someone who has been a chartered accountant how to read a budget for instance.

25) What period should apply for elected members to complete essential training after their election?

It should be determined as part of a performance agreement based on the results of formal assessment on taking office. If they fail to complete the

required training, they should lose their seat. This is basic competency we are talking about.

2.4 Continuing professional development

Continuing professional development: Guidance questions

- 26) Should ongoing professional development be undertaken by elected members?

Yes

- 27) If so, what form should this take?

Only if necessary, as identified through the performance agreement process. They should cover the costs.

Training: Guidance question

- 28) Do you have any other suggestions or comments on training?

Do not let training be conflated with incompetence or sloth!

3. The behaviour of elected members

3.1 Current Situation

Codes of conduct: Guidance questions

29) Should standards of conduct/behaviour differ between local governments?

No

30) Please explain.

The standards should be the same as for state government. Local government rules on conduct are far too lax. Consistency would ensure that the public are clearer of the standards expected and that should lead to more consistent application of the rules.

Which option do you prefer for codes of conduct and why? Codes of conduct are required

The codes will only cover the matters which local governments have a discretion to decide

All other matters are to be addressed in Act and Regulations

I think this gives the best balance. Another option would be for LGAs to draft them and have them approved by State Government, but that will result in a bit more red tape.

31) How should a code of conduct be enforced?

It needs to have teeth. Reported breaches should be investigated by a third party with real investigative powers (like the CCC) that can refer matters for prosecution if necessary. Breaches that are upheld must carry serious penalties - equivalent, or worse than the penalties that apply to directors found guilty of fraud. Dismissal, loss of entitlements, paying back salary and even jail are all things that would deter corrupt or unethical behaviour.

3.2 Regulation of elected member conduct: rules of conduct

Streamlined rules of conduct: Guidance questions

32) Do you support streamlined Rules of Conduct regulations?

No

33) Why?

I don't.

34) If the rules were streamlined, which elements should be retained?

35) Do you support a reduction in the time frame in which complaints can be made?

No

36) Is three months adequate?

No

Revised disciplinary framework: Guidance questions

37) Do you support an outcome-based framework for elected members?

No

38) Why or why not?

We need greater responsibility on elected members to do the right thing. That comes from deterrence and penalties for breaking the rules. The timescales involved for detecting bad behaviour can be years because so few people are interested in local government's day-to-day operations. As a result, there is a low detection rate for breaches and you have to rely on serious penalties being applied on the few occasions breaches are detected to act as a deterrent.

39) What specific behaviours should an outcomes based framework target?

No

3.3 Other matters recommended in the 2015-16 review

Application of the Rules of Conduct: Guidance question

- 40) Should the rules of conduct that govern behaviour of elected members be extended to all candidates in council elections?

No

- 41) Please explain.

I think the existence of a complaint could be revealed, but not the content (to ensure natural justice). There should be penalties for making clearly vexatious complaints to attempt to control an election outcome. But probably not at other times, whistleblowers need to be unafraid to come forward.

Offence Provisions: Guidance questions

- 42) Should the offence covering improper use of information be extended to former members of council for a period of twelve months?

Yes

- 43) Why?

Because they gained privileged information as elected members and should not be able to gain an advantage from that information.

- 44) Should this restriction apply to former employees?

Yes

- 45) Please explain?

Because they gained privileged information as employees and should not be able to gain an advantage from that information having left local government.

Confidentiality: Guidance question

- 46) Is it appropriate to require the existence and details of a complaint to remain confidential until the matter is resolved?

No

- 47) Why?

I think the existence of a complaint could be revealed, but not the content (to ensure natural justice). There should be penalties for making clearly

vexatious complaints to attempt to control an election outcome. But probably not at other times, whistleblowers need to be unafraid to come forward.

3.4 Reforms to the Local Government Standards Panel and the means to review alleged breaches of the Rules of Conduct Regulations

Sector conduct review committees: Guidance questions

48) What do you see as the benefits and disadvantages of this model?

It would be a fairly independent body (though probably not actually as independent as it may appear). It sounds cumbersome and fairly slow and mediation and public apologies are pretty weak outcomes. It would be better if there were financial disincentives, or remedial training included, or a black mark system (3 strikes and you are out).

49) What powers should the Conduct Review Committee have?

Ultimately to dismiss a member. Investigate, call witnesses, compel testimony, access records. Issue fines (or loss of salary) and mandate remedial training.

50) In your opinion what matters should go directly to the Standards Panel?

I think all complaints should go there. Independence is good.

51) Who should be able to be a member of a panel: elected members, people with local government experience, independent stakeholders?

Independent stakeholders

52) Who should select the members for the pool?

They should be appointed by the Minister for local government following an EOI process. There should be a fixed term on the panel. There must be balance on the panel. It needs a governance expert and a legal expert. A local government rep, a member of WALGA, the rest should be members of the public who have demonstrated they understand governance and natural justice.

53) How many members should there be on the Review Committee?

12 is a good number.

54) Are the proposed actions for the Review Committee appropriate?

No

55) If not, what do you propose?

I think they should be able to suspend or dismiss a member and issue monetary penalties if a serious breach is upheld. For minor breaches they should be able to issue enforceable undertakings requiring a member to have remedial training.

Review of elected member non-compliance: Guidance questions

56) Which of the options for dealing with complaints do you prefer? Why?

Option 2 - it is more independent. But it needs to avoid excessive red tape by having teeth to become a deterrent to bad behaviour in the first place.

57) Are there any other options that could be considered?

Refer everything to a group like the CCC, use the same model that applies to State Government.

58) Who should be able to request a review of a decision: the person the subject of the complaint, the complainant or both?

Both

3.5 Sanctions and other Standard Panel matters

Mediation: Guidance question

59) Do you support the inclusion of mediation as a sanction for the Panel?

Yes

60) Why or why not?

Because it's a very weak outcome I only support this for very minor breaches.

Prohibition from attending council meetings: Guidance questions

- 61) Do you support the Panel being able to prohibit elected members from attending council meetings?

Yes

- 62) Why or why not?

I think they should be able to dismiss members if there are sufficient grounds.

How many meetings should the Panel be able to order the elected member not attend? Indefinite (or better, dismissal).

- 63) Should the elected member be eligible for sitting fees and allowances in these circumstances?

Yes

- 64) Why

Because you have to let natural justice take its course. There should be a financial penalty if the elected member is subsequently found guilty of a breach (ideally tiered by the severity of the breach). Remember, detection rates are low here so you need large penalties as a deterrent.

Compensation to the local government: Guidance questions

- 65) Do you support the Panel being able to award financial compensation to the local government?

No

- 66) Why or why not?

I don't really understand who is paying the compensation. I support the elected member paying compensation if found guilty of a breach. But I don't support complainants being forced to compensate local government. Arguably local government is partly responsible for bad behaviour by elected members, they certainly shouldn't profit from it!

67) What should the maximum amount be?

See above. Commensurate with costs and to allow a deterrent to the bad behaviour.

Complaint administrative fee: Guidance questions

68) Do you support this option?

No

69) Why or why not?

There should be no barrier to reporting bad behaviour. None. That is essential for proper whistleblowing protections.

70) Do you believe that a complaint administrative fee would deter complainants from lodging a complaint?

Yes

71) Is this appropriate?

No

72) Would a complaint administrative fee be appropriate for a sector conduct review committee model?

No

73) Why or why not?

There should be no barrier to reporting bad behaviour. None. That is essential for proper whistleblowing protections.

74) What would be an appropriate fee for lodging a complaint?

\$10

75) Should the administrative fee be refunded with a finding of minor breach or should it be retained by the Department to offset costs?

Yes

76) Why or why not?

Because you need to set up an environment where breaches are rare because members understand their responsibilities and willingly comply to

avoid the negative consequences of being detected breaking the rules. I suspect at the moment reported breaches are rare because the public have no confidence any serious consequences will flow through to elected members. And they probably don't know how to complain either. I certainly didn't.

Cost recovery to local government: Guidance questions

- 77) Do you support the cost of the panel proceedings being paid by a member found to be in breach?

Yes

- 78) Why or why not?

I think it would reinforce the need for them to ensure they do not run foul of the rules.

Publication of complaints in the annual report: Guidance question

- 79) Do you support the tabling of the decision report at the Ordinary Council Meeting?

Yes

- 80) Why or why not?

In deidentified form with a basic outcome.

Tabling decision report at Ordinary Council Meeting: Guidance question

- 81) Do you support this option?

No

- 82) Why or why not?

I don't think that is appropriate. It should be reported to a governance committee.

3.6 Elected member interests

Elected member interests: Guidance questions

- 83) Should not-for-profit organisation members participate in council decisions affecting that organisation?

No

- 84) Why or why not?

Because I do not believe you can remain impartial. A better solution is for elected members to resign from the not-for-profit groups. They should still declare their knowledge of people within those groups because it is easy to resign but remain in the loop. But at the moment it is too easy to run for Council to benefit a special interest group.

- 85) Would your response be the same if the elected member was an office holder in the organisation?

Yes

Improving the behaviour of elected members: Guidance question

- 86) Do you have any other suggestions or comments on this topic?

This issue is for me the number 1 problem with local government and it goes well beyond 'not-for-profits'. Is it appropriate to have a Director of Planning who is married to a developer? There is a strong argument to say that is not appropriate. Similarly, not owning a financial interest in an area can be a bigger problem than owning one. How do you tackle that? I think, a bit like Federal MPs, everything should be at arms length in local government. You should not own any investment properties, it will bias your judgment. Perhaps a system of proxies could be set up to allow impartial people to review decisions - or you need to make it much easier for the public to report suspicions to an independent investigation group. The sums of money overseen by local government are huge and the level of oversight woefully inadequate.

4. Local government administration

4.1 Recruitment and selection of local government Chief Executive Officers

Recruitment and selection of local government CEOs: Guidance questions

- 87) Would councils benefit from assistance with CEO recruitment and selection?
Yes
- 88) Why?
Because selecting a CEO is a difficult process and one which should be standardised.
- 89) How could the recruitment and selection of local government CEOs be improved?
Bring in the PSC. Introduce clear performance agreements that they will be held to.
- 90) Should the Public Sector Commission be involved in CEO recruitment and selection?
Yes
- 91) If so, how?
Option 1.
- 92) Should other experts be involved in CEO recruitment and selection?
No
- 93) If so, who and how?
- 94) What competencies, attributes and qualifications should a CEO have?
It depends to an extent on the Council.

4.2 Acting Chief Executive Officers

Acting CEOs: Guidance questions

- 95) Should the process of appointing an acting CEO be covered in legislation?

Yes

- 96) Why or why not?

To ensure consistency and that due process is followed.

- 97) If so, who should appoint the CEO when there is a short term temporary vacancy (covering sick or annual leave for example)?

I think it should be stipulated that the 1-down member of the administration steps up.

- 98) Who should appoint the CEO if there will be vacancy for an extended period (for example, while a recruitment process is to be undertaken)?

The PSC.

4.3 Performance review of local government Chief Executive Officers

Performance review of local government CEOs: Guidance questions

- 99) Who should be involved in CEO performance reviews?

The PSC.

- 100) What should the criteria be for reviewing a CEO's performance?

They should sign a performance agreement drafted by Council and endorsed by PSC. That is then used to review performance.

- 101) How often should CEO performance be reviewed?

Annually.

102) Which of the above options do you prefer?

3. it's cheaper than one and will result in more consistency than 2.

103) Why?

Yes

104) Is there an alternative model that could be considered?

Well model 3 is hardly prescriptive! A performance agreement on commencement, audited annually.

4.4 Extension or termination of the Chief Executive Officer contract immediately before or following an election

Termination or extension of CEO contract around an election: Guidance questions

105) Would a 'cooling off' period before a council can terminate the CEO following an election assist strengthening productive relationships between council and administration?

No

106) What length should such a cooling off period be?

107) For what period before an election should there be a restriction on a council from extending a CEO contract?

6 months.

108) Should there be any exceptions to this?

No, but an incoming Council should be able to terminate the CEOs contract if it transpires the previous Council has acted improperly in extending the contract. PSC to be the arbiter?

4.5 Public expectations of staff performance

Public expectations of staff performance: Guidance questions

109) Is greater oversight required over local government selection and recruitment of staff?

Yes

110) Should certain offences or other criteria exclude a person from being employed in a local government?

Yes

111) If so, what?

I think conviction of any criminal offence should preclude you from working for local government. I hope that doesn't rule out too many in the workforce!

Strengthening local government administration: Guidance question

112) Do you have any other suggestions or comments on this topic?

5. Supporting local governments in challenging times

Remedial intervention: Guidance questions

113) Should the appointed person be a departmental employee, a local government officer or an external party?

External party

114) Why?

They need to be independent of the authority and free from bias or perceptions of it.

115) Should the appointed person be able to direct the local government or would their role be restricted to advice and support?

Direct the local government

116) Please explain.

This person needs to have authority to get things fixed, you can't do that by making recommendations unless they are enforceable somehow.

117) Who should pay for the appointed person?

The State Government

118) Why?

It's the only fair way to do it.

Powers of appointed person: Guidance question

119) What powers should an appointed person have?

I think essentially they need the same powers as the CEO, perhaps more.

Remedial action process: Guidance questions

120) Do you think the proposed approach would improve the provision of good governance in Western Australia?

Yes

121) Please explain.

It's too easy for LGAs to do their own thing and act like echo chambers. This would hang over them enhancing their decision making for fear of slipping up.. And it would prevent the dysfunctional situation we see in the City of Perth.

122) What issues need to be considered in appointing a person?

They need to have appropriate skills and expertise and they need to have authority.

Supporting local governments in challenging times: Guidance question

123) Do you have any other suggestions or comments on this topic?

Get on with it! My lot up in Joondalup have completely abandoned proper consultation and make decisions that quite literally cost homeowners hundreds of millions of dollars. It's all completely legal because we didn't know what they were doing at the time and so didn't complain. Had they done the right thing and advertised properly as they promised to do, we would have howled them down.

6. Making it easier to move between State and local government employment

Transferability of employees: Guidance questions

124) Should local and State government employees be able to carry over the recognition of service and leave if they move between State and local government?

125)

126) What would be the benefits if local and State government employees could move seamlessly via transfer and secondment?

I don't think there would be any. In fact, there are a lot of potential negatives.

Making it easier to move between State and local government employment: Guidance question

127) Do you have any other suggestions or comments on this topic?

WA is a small state. Separation of powers is essential to good governance. You would be better getting rid of one tier of government rather than trying to make it more seamless to transition between them.

7. Gifts

7.1 Simplifying the gift provisions

A new framework for disclosing gifts: Guidance questions

128) Is the new framework for disclosing gifts appropriate?

No

129) If not, why?

I think the thresholds are too high. Things like free sports tickets are totally inappropriate to give to elected members or officials. I see no reason why all gifts over \$30 in value should not be donated to the needy. If that is clearly communicated, it would stop. I'm not sure the relatives should be discounted either. Relatives may be giving gifts to gain favours and I think any gift from a relative that could reasonably be seen to have an interest in matters before Council should be declared.

130) Is the threshold of \$500 appropriate?

No

131) If no, why?

It's far too high.

132) Should certain gifts – or gifts from particular classes or people – be prohibited?

Yes

133) Why or why not?

I think anything from anyone directly connected with the Council's business should be prohibited. Developers, suppliers, etc. It's simply not appropriate and too close to being a potential bribe.

134) If yes, what gifts should be prohibited?

ALL gifts! If someone really insists on a gift, they can contribute it to the homeless instead.

Excluding gifts received in a personal capacity: Guidance questions

135) Should gifts received in a personal capacity be exempt from disclosure?

No

136) If yes, how could 'personal capacity' be defined?

137) Should there be any other exemptions from the requirement to disclose a gift over the threshold?

No

138) If so, what should these be? Please justify your proposal.

Gifts: Guidance question

139) Do you have any other suggestions or comments on this topic?

Again, this is a fraught area. The only easy solution is to get tough. Failing that, make it the same rules as bind the State public service.

8. Access to information

8.1 Public notices

Public notices: Guidance questions

140) Which general option do you prefer for making local public notices available?

Option 6

Why? Because you have to keep people involved in local government and we are busier than ever!

141) Should the requirements for any notice in the Supplementary Information - Public Notices be changed?

No

142) Please list and explain the reasons for the proposed change.

143) Could any of the notices in the Supplementary information be published on alternative websites?

No

144) Please provide details

8.2 Information available for public inspection

Information available for public inspection: Guidance questions

145) Using the following table, advise how you think information should be made available:

Provision	Documents	In person only	Website only	Both	Neither
Section 5.53	Annual Report Both Both				
Section 5.75 & 5.76	Primary and Annual returns – for Elected members Includes – sources of income Trusts Debts Property holdings. Interests and positions in corporations. Both				
Section 5.87	Discretionary disclosures generally Both				
Section 5.82	Gifts (already required to be on the website) Both				
Section 5.83	Disclosure of travel contributions (already required to be on the website) Both				
Elections Regulations 30H	Electoral gifts register Both				
Section 5.98A	Allowance for deputy mayor or deputy president				

	Both
Section 5.100	Payments for certain committee members Both
Functions and General Regulations 17	Tenders register Both
Section 5.94 & Administration Regulations 29	Register of delegations to committees, CEO and employees Both
	Minutes of council, committee and elector meetings Both
	Future plan for the district Both
	Annual Budget Both
	Notice papers and agendas of meetings Both
	Reports tabled at a council or committee meeting Both
	Complaints register (concerning elected members) Neither

Contracts of employment of the CEO and other senior local government employees	Both
Schedule of fees and charges	Both
Proposed local laws	Both
Gazetted Local laws (and other law that has been adopted by the district)	Both
Rates record	Both
Electoral roll	Neither

Note: There is no intention to amend the current limitations imposed by section 5.95 of the Act which limits the disclosure of certain information.

146) Should the additional information that is available to the public in other jurisdictions be available here?

Yes

147) If so which items?

All of them.

148) How should they be made available: in person, website only or both?

Required

149) Is there additional information that you believe should be made publicly available? Please detail.

I think the answer above should be 'both'.

I think development proposals should be publically available. I also think LGAs need to allow people to register for electronic 'push' notifications regarding anything they are interested in: eg developments within a radius of interest to them, or about a particular aspect of LGA business, like parks, or sporting groups.

- 150) For Local Governments: How often do you receive requests from members of the public to see this information?
- 151) What resources do you estimate are involved in providing access in person (hours of staff time and hourly rate)?

Access to information: Guidance question

- 152) Do you have any other suggestions or comments on this topic?

I also think LGAs need to allow people to register for electronic 'push' notifications regarding anything they are interested in: eg developments within a radius of interest to them, or about a particular aspect of LGA business, like parks, or sporting groups.

9. Available information

9.1 Expanding the information provided to the public

Expanding the information provided to the public: Guidance questions

153) Which of these options do you prefer?

Option 2: Additional reporting requirement

154) Why?

Because they need to be more accountable than they are.

155) In the table below, please indicate whether you think the information should be made available, and if so, whether this should be required or at the discretion of the local government:

Proposal	Should this be made available: No, optional, required?
Live streaming video of council meetings on local government website	Optional
Diversity data on council membership and employees	Not Required
Elected member attendance rates at council meetings	Required
Elected member representation at external meetings/events	Required
Gender equity ratios for staff salaries	Required
Complaints made to the local government and actions taken	Required
Performance reviews of CEO and senior employees	Required
Website to provide information on differential rate categories	Required

Proposal	Should this be made available: No, optional, required?
District maps and ward boundaries	Required
Adverse findings of the Standards Panel, State Administrative Tribunal or Corruption and Crime Commission.	Required
Financial and non-financial benefits register	Required

156) What other information do you think should be made available?

Planning applications should be easy to scrutinise.

Expanding the information available to the public: Guidance question

157) Do you have any other suggestions or comments on this topic?

Build nice opt-in registers such as are in place in the UK and over East. Park booking systems (booked/not booked/which community group) should be public.

Defining red tape: Guidance questions

158) Which regulatory measures within the Act should be removed or amended to reduce the burden on local governments? Please provide detailed analysis with your suggestions.

a) Briefly describe the red tape problem you have identified.

I

b) What is the impact of this problem? Please quantify if possible.

c) What solutions can you suggest to solve this red tape problem?

159) Which regulatory measures within the Act should be removed or amended to reduce the burden on the community? Please provide detailed analysis with your suggestions.

a) Briefly describe the red tape problem you have identified.

b) What is the impact of this problem? Please quantify if possible.

c) What solutions can you suggest to solve this red tape problem?

10.1 Potential red tape reductions

Special majority: Guidance question

160) Should the provisions for a special majority be removed?

No

161) Why or why not?

I like the status quo.

Senior employees: Guidance questions

- 162) Is it appropriate that council have a role in the appointment, dismissal or performance management of any employees other than the CEO? Why or why not?

Because ultimately the Council need to ensure the authority is accountable to them.

- 163) Is it necessary for some employees to be designated as senior employees?

No

- 164) If so, what criteria should define which employees are senior employees?

Exemption from accounting standard AASB124 - Related party disclosures: Guidance questions

- 165) Are the existing related party disclosure provisions in the Act sufficient without the additional requirements introduced by AASB 124?

No

- 166) Why or why not?

I really have no informed opinion on this.

Disposal of property: Guidance questions

- 167) The threshold for trade-ins was set originally to \$50,000 in 1996 and raised to \$75,000 in 2015. Should that threshold be raised higher,

No

- 168) if so how high?

169) Should the threshold remain at \$75,000 but with separate exemptions for specific types of equipment, for example plant?

No

170) The general \$20,000 threshold was put in place in 1996 and has not been amended. Should the threshold be raised higher than \$20,000?

Yes

171) If so, what should it be and why?

I don't know, perhaps apply CPI?

172) Would raising these thresholds create an unacceptable risk that the items would not be disposed of to achieve the best price for the local government?

No

173) Is there an alternative model for managing the disposal of property? Please explain.

Reducing red tape: Guidance question

174) Do you have any other suggestions or comments on this topic?

There's usually a reason for red tape. People with vested interests lobby to remove it and those who benefit from it rarely know of its existence. Tread carefully.

11.1 Risks and benefits of borrowing

Regional subsidiaries: Guidance questions

- 175) Which option do you prefer?
- 176) Should regional subsidiaries be allowed to borrow money other than from the member councils?
- 177) Why or why not?

- 178) If a regional subsidiary is given the power to borrow directly, what provisions should be put in place to mitigate the risks?

Regional subsidiaries: Guidance question

- 179) Do you have any other suggestions or comments on this topic, including on any other aspect of the *Local Government (Regional Subsidiaries) Regulations 2017*?

Local Government Act review: Guidance question

- 180) You are invited to make comment and put forward suggestions for change on other matters which have not been covered in this paper.

Improve community consultation standards. I think there should be minimum standards LGAs must comply with. Perhaps linked to the financial impacts of the matter being deliberated. Modern electronic communication is not really helping here, nor is the dearth of people using postal mail.