

Consultation questions

We would be keen to hear your views on these proposals, in particular on:

Chapter 1

1. To what extent do you agree or disagree with the six principles for electoral reform of equity, accessibility, participation, improving citizen experience, simplicity, integrity?

Fully agree

Please explain your answer:

Our response to this consultation focuses in particular on the impact of the White Paper's proposals on the Welsh language. The six principles are suitable in the context of facilitating Welsh speakers' involvement in the electoral process

Chapter 2

2. Should the Welsh Government commit resource to considering how electronic remote voting could operate for devolved elections?

Yes

No

Don't know

Please explain your answer:

As the Welsh Government considers how electronic remote voting could work for devolved elections (whether by devoting resources or not to that) remote voting must be made equally accessible in Welsh and English. This should be one of the practical criteria that the system would need to meet. The experience of voting in Welsh should be no different to English and the active offer principle of being able to vote in Welsh should be central to the system. In other words, voting in Welsh or English should be default options, Welsh speakers should not have to look for the option of voting in Welsh.

3. What impacts, if any, do you think the proposed introduction of an all-Wales database of electoral registration data would have on the electoral process (such as registration and electoral services)?

Please consider the potentially positive and negative impacts and provide evidence to support your response, where available. Please comment on each characteristic individually.

If an all-Wales database of electoral registration data is introduced it must be ensured that the database is completely bilingual from the outset and treats the Welsh and English languages equally. Guidance on creating bilingual databases and software can be found [here](#). There may be advantages to maintaining a database of electors as it would be possible to identify individuals' language preference as they registered meaning that it would be possible to ensure that they received election materials etc in their preferred language, in Welsh, English or bilingually.

4. What are your views on the application of Elections Act 2022 provisions on (a) digital imprints for digital campaign material, and (b) online nominations?

No comment.

5. Should principal and town and community councils revert to four year terms?

Yes

No

Don't know

Please explain your answer:

No comment.

Chapter 3

6. To what extent do you agree or disagree that the franchise for devolved elections should be restated in one bi-lingual Welsh Act?

Strongly Agree

Please explain your answer:

We welcome all steps to ensure the availability of law bilingually in Wales.

7. From your perspective, should the franchise reflect the changes in the status of EU citizens now the UK has left the EU?

No comment.

8. How can we best help people understand they have been automatically registered and feel confident that their data is protected, especially for people who may be vulnerable or wish to register anonymously?

No comment.

9. To what extent do you agree with the removal of the open register in relation to devolved elections?

Strongly Agree

Agree

Disagree

Strongly Disagree

Please explain your answer

No comment.

10. Should the Welsh Government place a duty on local authorities to have data sharing agreements within the authority itself, and where applicable, with other authorities or organisations?

Yes

No

Don't know

Please explain your answer:

No comment.

11. Are there any specific aspects of automatic registration that should be piloted before we move to an all Wales roll out?

Yes

No

Don't know

Please explain your answer:

No comment.

12. To what extent do you agree or disagree that students should have the option to register to vote whilst enrolling at university?

Strongly Agree

Agree

Disagree

Strongly Disagree

Please explain your answer:

No comment.

Where answered Strongly Agree or Agree:

12a. Should any data that is provided be subsequently shared, via a data sharing agreement, with the relevant Local Authority's Electoral Services Team?

Yes

No

Don't know

Please explain your answer:

No comment.

Chapter 4

13. Do you agree that a statutory Electoral Management Board for Wales should be established?

Agree

Please explain your answer:

No comment.

14. If answered Strongly Agree or Agree to Question 13, what should its functions be?

It would be possible for an Electoral Management Board to provide guidance and good practice and carry out research on conducting elections bilingually and in so doing contribute to ensuring equality for the Welsh and English languages in the administration of elections.

15. Should the Electoral Management Board have powers to issue directions to Returning Officers and Electoral Registration Officers?

If the Electoral Management Board is given the power to issue directions to Returning Officers and Electoral Registration Officers we believe it would be very beneficial if it provided instructions on conducting elections bilingually and ensuring equality for the Welsh and English languages in the administration of elections. Please see our answers to questions 42-44 regarding the type of directions that could be given in relation to conducting elections in Welsh and bilingually and ensuring that the Welsh language is treated no less favourably than the English language in the administration of elections.

16. Should the Electoral Management Board have the power to issue advice to Returning Officers and Electoral Registration Officers on the carrying out of their functions?

Yes

No

Don't know

Please explain your answer:

If the Electoral Management Board is given the power to issue advice to Returning Officers and Electoral Registration Officers we believe it would be very beneficial if it provided instructions on conducting elections bilingually and ensuring equality for the Welsh and English languages in the administration of elections. Please see our response to questions 42-44 in this regard.

17. What are your views on who should be members of the Electoral Management Board and how they should be appointed?

No comment.

18. To what extent do you agree or disagree with our proposals to provide for greater electoral certainty by extending the statutory time during which no final electoral review reports can be published and no electoral review orders may be made?

Strongly Agree

Agree

Disagree

Strongly Disagree

Please explain your answer:

No comment.

19a. At which point in the electoral cycle should the Commission be prevented from publishing electoral review reports:

Within twelve months of an ordinary election

Within fifteen months of an ordinary election

Other – please specify

No comment.

19b. Do you agree the Commission should, as far as possible, be required to schedule electoral reviews within two years of a community review being completed?

No comment.

20. To what extent do you agree or disagree with the suggested proposals for setting maximum review and decision making periods?

Strongly Agree

Agree

Disagree

Strongly Disagree

Why do you say this?

No comment.

21. What are your views on whether a power to pause the conduct of electoral reviews should be included in legislation?

No comment.

22. To what extent do you agree or disagree with the principle of a common, extended list of mandatory consultees for all parts of the electoral review process?

Strongly Agree

Agree

Disagree

Strongly Disagree

Why do you say this?

We do not disagree with the principle of having a common, extended list of mandatory consultees for all parts of the electoral review process. We note that there is an intention to include the Welsh Language Commissioner as a consultee when preparing the programme to carry out reviews of electoral arrangements. We do not disagree in principle with this and have in the past been pleased to work with the Local Democracy and Boundary Commission for Wales, specifically in relation to ward and constituency names as we note below in our response to question 23. It is unclear whether the intention is to impose a requirement on the Commission to consult with the Commissioner, or a duty on the Commissioner to respond, or both. However, we would like to note that the Commissioner's resources are

limited and that that this needs to be recognised if further responsibilities are to be placed on the Commissioner through legislation.

23. To what extent do you agree or disagree that requirements to engage with eligible voters as part of the electoral review process should be strengthened, including in respect of ward names?

Strongly Agree

Agree

Disagree

Strongly Disagree

Why do you say this?

The consultation paper highlights the strong public interest in the names of electoral wards and recognises, therefore, that the naming of wards should be given a more central place in the review process. It recommends that the Commission's methodology in determining ward names should be clearly set out and should be consulted upon. It notes the Government's intention to require the Commission to demonstrate in its reports that it has considered both the Welsh and English name of each ward. It is noted that the Commission will be required to publish ward names in Welsh and English in both Welsh and English versions of their reports, to enable electors and other stakeholders to more easily identify the recommended ward names in both languages.

The Commissioner welcomes the intention to give naming a more central place in the review process. Determining a ward name is neither a secondary nor a subsidiary matter, as testified by the public interest. Names are essential labels for the public to recognise wards and can influence how the public eventually feel and engage with the electoral ward.

It is therefore essential that the Commission has a robust and transparent methodology for determining ward names and that decisions on official forms of ward names are not made on the whim of individuals.

It should be emphasised that the Commissioner has considerable expertise in this area. The Commissioner is responsible for providing advice on standard place-names in Wales. It has a panel of experts, the [Place-Names Standardisation Panel](#), to assist it in this work and ensure that all recommendations made in the Commissioner's name are well founded. When forming its recommendations the Panel will have regard to the meaning, origin and local and historical use of the names and will follow the [Guidelines for Standardising Place-names in Wales](#). The national Guidelines ensure that consistent methodology and principles are used to standardise the names of all parts of Wales. The recommendations are then shared publicly in the [List of Standardised Welsh Place-names](#) online.

As the vast majority of Welsh ward names match the names of the relevant settlements, it makes perfect sense that the Commissioner provides expert advice to the Boundary Commission and the Welsh Government on the names of the wards. Indeed, that is what it has done over recent years as the Boundary Commission reviewed the boundaries of Welsh electoral wards before making its final recommendations on the wards – and their names – to the Welsh Ministers.

The Boundary Commission consulted with us on the names of the proposed wards and detailed recommendations and explanatory notes were provided to assist them with the work. Nevertheless, despite the Boundary Commission committing at the beginning of the process to consulting with us and representing our recommendations and our views in its reports, there was no commitment to use our recommended forms, even where we have agreed the standard forms of those names with local authorities. There were cases where the Commission had accepted our recommendations regarding the Welsh forms to be used, but had gone against our recommendations in the ‘English’ forms they offer (although these are essentially Welsh names). There are other examples where our recommendations have been rejected altogether.

There were also examples where it was not clear in the reports what the Commissioner's recommendations were about which forms to use in Welsh and English texts, with the translation process clouding the situation further. Therefore, the Commissioner welcomes the Government's wish that the Commission highlights the Welsh and English forms recommended in the Welsh and English reports in order to ensure that there is no ambiguity. Doing so would also highlight the need to consider further standardisation of names and the removal of dual forms where only a letter (or hyphen or accent) is different between the ‘Welsh’ and ‘English’ forms.

However, the ward names presented in the Commission's reports will be *recommendations*, and it is assumed that the Welsh Government will be expected to determine the final official forms in regulations. The Commissioner's office has had recent experience of advising the Government's Translation Service on the forms of ward names, especially in cases where the Commissioner's opinion or recommendation was not clearly or reliably communicated in the Commission's reports. The Government Translation Service' Terminologist is a valuable member of the Commissioner's Place-Names Standardisation Panel and the constructive dialogue with him about problematic names and his ongoing contribution to the work of the Panel was appreciated.

However, despite this collaboration and advice, in scrutinising the ward names published in Government regulations we saw that the Government had decided to follow its own route in relation to certain names. This leads to unnecessary multiplication of forms. That is particularly frustrating for us when we have already agreed on standard forms with local authorities. Rhondda Cynon Taf Borough Council is an example of a local authority with which we have worked closely to agree the standard forms of place-names in the area. Agreement was reached, for example, to write Llwynypia as one word without hyphens in Welsh and English contexts in order to have one standard form. That is also what the Boundary Commission recommended to the Government, but it was noted that the

Government had decided to introduce hyphens in the English form of the name of the ward, therefore Llwynypia in Welsh and Llwyn-y-pia in English. As the Government goes against our expert advice, there is a risk that the names of the wards are spelt differently from the names of the settlements and that they are different to the forms which the local authorities use. There is also a risk of undermining the terminology of place-names projects and creating confusion.

In December 2021, in reaching conclusions on the electoral boundary review programme, the Minister for Finance and Local Government stated that the names of the wards had led to 'difficulties and delays' at the end of the process and that there was 'often a tension between a name which individuals identify with and the proposals put forward, either by the Commission or the Welsh Language Commissioner'. The Commissioner agrees with this determination. It is inevitable that tensions will arise in some cases, whatever forms are chosen, as individuals will have different views on different forms. Not everyone will be happy with the official forms that are used, but public organisations in Wales have an important role to play in promoting, normalising and reconciling the use of standard forms of place-names.

In the Cooperation Agreement the current Government and Plaid Cymru have recognised the importance of Welsh place-names to the nation and are committed to 'ensure that Welsh place-names in the built and natural environment are safeguarded and promoted.' A commitment to follow the Welsh Language Commissioner's standard recommendations would be a practical step towards this aim. It would also be pragmatic step to facilitate the naming process in question, providing an external mechanism to cut debate and remove potential difficulties and delays at the end of the process. These names could also be published in the List of Standardised Welsh Names online so that the public and translators know where to turn for authoritative answers about the standard and official forms of Welsh place-names.

It should be emphasised the Commissioner's recommendations for standard forms currently have no statutory power. They are just recommendations, and organisations – including the Boundary Commission and Welsh Government – have the freedom to decide which forms they choose. This freedom leads to a proliferation of forms and confusion where individual officers have unfair responsibility for making rather challenging and political decisions about what forms should be used. This could be overcome by delegating this difficult work to the Welsh Language Commissioner and its Place-Names Standardisation Panel which already has considerable expertise in the field and can provide specialist and independent advice. The Government has the opportunity to act strongly in favour of the Welsh language and Welsh place-names, to promote the status of the Commissioner's recommendations, and to commit to giving every electoral ward in Wales a standard Welsh name. we would welcome discussing this matter with you further.

24. To what extent do you agree or disagree with the proposals to amend and extend the considerations the Commission must take into account when determining electoral arrangements which maximise effective and convenient local government?

Strongly Agree

Agree

Disagree

Strongly Disagree

Why do you say this?

No comment.

25. Do you agree with our proposals requiring the Commission to undertake a further consultation where a recommendation in its proposed final review report is not one of the options it consulted upon in its draft report?

Please see our response to question 23.

26. Do you agree with our proposals to enable Welsh Ministers to require the Commission to revisit a part of an electoral review before they make an electoral review order?

Please see our response to question 23.

27. Are there any further changes to the electoral review process that should be considered?

No comment.

28. To what extent do you agree or disagree that the purpose of the six-week representation period should be clarified in the legislation?

Strongly Agree

Agree

Disagree

Strongly Disagree

Why do you say this?

No comment.

29. Do you agree that Welsh Ministers should be required to consider any representations received during this period before taking any action to direct the Commission to undertake further work or implement, modify or not implement the recommendations set out in the final recommendations report?

No comment.

30. To what extent do you agree or disagree that legal requirements on the Commission to provide hard copies of documentation should be removed, except for when they are requested?

Strongly Agree

Agree

Disagree

Strongly Disagree

Why do you say this?

No comment.

31. To what extent do you agree or disagree with the proposals for legislative change in relation to community reviews?

Strongly Agree

Agree

Disagree

Strongly Disagree

Why do you say this?

Please see our response to question 23 in relation to ward names.

32. Please provide any further comments on how you think the process of conducting community reviews could be improved.

Please see our response to question 23 in relation to ward names.

33. To what extent do you agree or disagree that seaward boundary review arrangements should be revised to include the ability for the Commission to undertake reviews relating to multiple local government areas and the expansion and contraction of seaward boundaries in a single review process? Should those arrangements to be included in the same review order?

Strongly Agree

Agree

Disagree

Strongly Disagree

Why do you say this?

No comment.

34. Do you agree with our proposals to transfer the functions of the Independent Remuneration Panel for Wales to the Commission?

No comment.

35. Do you agree that functions relating to the determination of the salaries of chief executives should be abolished and not transferred?

No comment.

36. What do you think about the idea that new powers should be created to enable determinations to be made about parachute payments for councillors?

No comment.

37. Do you agree with our proposal for Wales to maintain a single regulatory framework on political finance for reserved and devolved elections in Wales, where appropriate?

No comment.

38. Please provide any further comments on the specific measures under consideration regarding political finance.

No comment.

39. What types of innovation in electoral administration would you like to see piloted in the future?

No comment.

40. How could we facilitate a more varied mix of local authorities participating in future pilots?

No comment.

41. What are your views on a power of direction for Welsh Ministers which would enable them to compel a local authority to pilot electoral innovations?

No comment.

42. Should Returning Officers be subject to specific Welsh language requirements when elections take place?

Yes

Please explain your answer:

Over the years members of the public have contacted the Commissioner to complain that Electoral Officers treat the Welsh language less favourably than the English language when undertaking their duties. Examples include monolingual English correspondence being sent by Returning Officers, or results not being published in Welsh. In 2015 the Commissioner published the *General Election 2015: Voting Forms, Related Information and Declaring Results in Welsh*, and then in 2017 a further report on the *2016 National Assembly for Wales and Police and Crime Commissioner Elections* was published (please see the attachment). We encourage you to consider the findings and recommendations of those reports in the context of questions 42, 43 and 44 (unfortunately we no longer have a copy of the former report as it was lost in a cyber attack in 2020, however we are confident that we shared it with you when responding to the Welsh Government's consultation on *Electoral Reform in Local Government in Wales* in 2017). It should be noted that we believe that implementing some of the recommendations of these reports has improved the situation somewhat as evidenced by the second report, and that we have not received many relevant complaints

following more recent elections. However, we remain of the opinion that it is necessary to formalize the responsibilities of returning officers in relation to the Welsh language. In the Welsh Government's consultation on *Electoral Reform in Local Government in Wales* in 2017 (or response is attached) it was asked whether the statutory chief executive role should include the role of returning officer role. We responded stating that local authorities are responsible for implementing standards relating to delivering services to the public in Welsh in accordance with the requirements of the Welsh Language (Wales) Measure 2011. If the responsibility of returning officer were to be transferred to the statutory chief executive we are of the view that these electoral activities would fall under the scope of the relevant standards. We stated that we would therefore welcome the intention for the statutory chief executive role to include the role of returning officer. We continue to hold this view, and we stated this in our response to the National Assembly for Wales Constitutional and Legislative Affairs Committee consultation on the [Senedd and Elections \(Wales\) Bill in 2019](#) as well.

43. Are there any types of services you would like to see Returning Officers providing in Welsh?

There should be no difference between the services that Returning Officers provide to the public in Welsh and in English. In other words, the services provided in English should be provided in the same way in Welsh, and the Welsh language should not be treated less favourably than the English language in doing so.

44. Have you ever experienced any issue related to the Welsh language during elections?

We are responding to this consultation as an organisation which has the statutory aim of promoting and facilitating the use of the Welsh language, rather than as an individual. We are aware of problems relating to the Welsh language during elections including in relation to the functions of Electoral Registration Officers and Returning Officers. Our reports *General Election 2015: Voting Forms, Related Information and Declaring Results in Welsh*, and *2016 National Assembly for Wales and Police and Crime Commissioner Elections* report highlight these problems. We ask that you consider the findings of these reports. Please see our response to question 42 in relation to this.

Chapter 5

45. Should the Welsh Government consider making provision for an online voter information platform? What information should be provided on the platform and who should host it?

Yes

No

Don't know

Please explain your answer:

If an online platform is developed it must be ensured that it will be equally accessible in both Welsh and English and that the Welsh language will not be treated less favourably than the English language in providing the service to the public in accordance with the Welsh Ministers' Welsh language standards [compliance notice](#).

46. Who would need to provide information to an online voter information platform and how could they be supported to do so?

No comment.

47. What should be done to encourage political parties to produce accessible materials?

No comment.

48. To what extent do you agree or disagree that that the returning officer at devolved elections should be under a duty to provide such equipment as it is reasonable to provide for the purposes of making it easier for disabled people to vote?

It seems reasonable and essential that they provide equipment that makes it easier for disabled people to vote.

49. What support should be put in place to ensure the returning officer is able to effectively discharge that role?

No comment.

50. Do you think the Welsh Government should specify in regulations the type of assistance which must be offered to disabled voters in polling stations?

Yes

No

Don't know

Please explain your answer:

No comment.

51. What sort of assistance do you think should be offered to disabled voters in polling stations?

No comment.

52. In addition to provisions in the Curriculum for Wales, are there any other measures that the Welsh Government should put in place through the education system to ensure that learners in Wales can confidently take part in Welsh elections?

No comment.

53. To what extent do you agree or disagree that the definition of the electoral offence of Undue Influence provided by section 114A of the Representation of the People Act 1983 be used for devolved elections?

Strongly Agree

Agree

Disagree

Strongly Disagree

Why do you say this?

No comment.

54. Do you think some or all of these proposed actions described in the White Paper will help to contribute to reducing instances of abuse of candidates?

Yes

No

Don't know

Please explain your answer:

No comment.

55. If an exemption from candidates spending limits for security related spending is sought, what activities should be included in that exemption?

No comment.

56. Will the proposed addition to the standard wording included in the Statement of Persons Nominated form have the desired effect of reducing occurrences of abuse or would different measures would be more effective?

Yes

No

Don't know

Please explain your answer:

No comment.

57. What other actions would contribute to reducing instances of abuse of candidates?

No comment.

58. Should Welsh Ministers legislate to require the establishment and maintenance of an 'Access to Elected Office Fund'?

Yes

No

Don't know

Please explain your answer:

No comment.

59. Should this Fund be available to support candidates from under-represented groups for all devolved Welsh ordinary and by-elections?

No comment.

60. If you agree the Fund should be a requirement set out in primary legislation, what should be the parameters within which the Fund should operate?

No comment.

61. To what extent do you agree or disagree that the requirement to set out the Local Government Candidates' Survey questions in regulations should be removed?

Strongly Agree

Agree

Disagree

Strongly Disagree

Why do you say this?

No comment.

61a. If Strongly Agree or Agree, should the survey be updated through a formal review process involving key partners?

No comment.

62. Do you agree there should be flexibility for local authorities to ask questions about local widening participation measures?

No comment.

63. Do you agree questions should be included in the survey about candidates' experiences of abuse and harassment (see the section on "other measures we are taking to ensure candidates safety")?

No comment.

64. Do you think Welsh Ministers should approve the full set of questions or only the core all-Wales questions?

No comment.

Chapter 6

65. What are your views on the impact of maintaining the current renewal time of 5 years in light of the Elections Act 2022 changes?

No comment.

66. Would you like to see advance voting and /or voting in a range of venues offered for devolved elections across Wales?

Yes

No

Don't know

Please explain your answer:

No comment.

67. Do you support the introduction of an online absent voting application system in Wales? If yes, what would you like to see in place?

Yes

No

Don't know

Please explain your answer:

If an online absent voting system is to be introduced in Wales it must be ensured that all elements of the service are available in Welsh in exactly the same way as in English and that the Welsh language is not treated less favourably than the English language in providing the service to the public.

68a. Do you think that such a system would help to reduce the number of postal votes rejected due to errors on PVS' and help raise public confidence in the postal voting system?

Yes

No

Don't know

Please explain your answer:

No comment.

68b. Could a manual system be used to do this?

Yes

No

Don't know

Please explain your answer:

No comment.

69. Would the introduction of a postal ballot tracking system, such as that described above, create a significant administrative burden on local authority electoral teams?

Yes

No

Don't know

Please explain your answer:

No comment.

70. Do you support the introduction of a postal vote e-tracking system in Wales?

Fully support

Partially support

Do not support

Please explain your answer:

If a vote e-tracking system is to be introduced in Wales it must be ensured that all elements of the service are available in Welsh in exactly the same way as in English and that the Welsh language is not treated less favourably than the English language in providing the service to the public.

71. Do you support the wider introduction and use of Digital Registers for non-reserved elections in Wales? What are the benefits or detriments of doing so?

If Digital Registers for non-reserved elections in Wales were to be introduced in Wales it must be ensured that all elements of the service are available in Welsh in exactly the same way as in English, and that the Welsh language is not treated less favourably than the English language in providing the service to the public.

72. Are there any potential barriers to a wider introduction of Digital Registers?

Yes

No

Don't know

Please explain your answer:

No comment.

Chapter 7

73. To what extent do you agree or disagree that there should be mandatory training and development for councillors?

Strongly Agree

Why do you say this?

We believe that such training would be an opportunity to ensure that councillors understand the requirements of the Welsh language standards of the local authorities. It would also be an opportunity to provide language awareness training about the Welsh language in their area and in Wales in general, and how they can in their work, promote and ensure opportunities for their constituents and the officers of the local authority itself to use the Welsh language on a day-to-day basis.

74. If Strongly Agree or agree to question 73, should this mandatory training and development for councillors include principal councils and town and community councils?

Yes. In 2014 the Welsh Language Commissioner responded to the Welsh Government's consultation on Community council clerk qualifications regulations (copy attached). A module provided by the Society for Local Councils Clerks was referred to. In our response to the Government's Local Government and Elections (Wales) Act 2021: Draft Statutory Guidance for Community and Town Councils consultation (copy attached) the Commissioner reiterated the comments made in the 2021 consultation urging the Government to discuss with the Society how to ensure the clerks' understanding of the status and situation of the Welsh language in Wales, including:

- the official status of the Welsh language in Wales following the Welsh Language (Wales) Measure 2011 and the situation of Welsh as a language spoken in all communities in the country
- bilingual administration
- Welsh language schemes (held by a number of community councils)
- the Welsh language standards deriving from the Welsh Language (Wales) Measure 2011 (although community councils are not subject to them, the standards are relevant to public services in Wales)

We believe that training on the above issues should be available to councillors of main councils and town and community councils alike (whether they are clerks or not). We understand that the [Good Councillor's Guide for Community and Town Councillors](#) contains some guidance about the Welsh language, but we believe it would be beneficial if that information and the information in the bullet points above were part of the mandatory training and development of councillors of main councils and town and community councils alike.

75. If Strongly Agree or Agree to question 74, should the expectations for mandatory training be different between principal councils and town and community councils?

The training should be suitable to the requirements of the different councillors in accordance with the statutory duties of the different authorities of which they are members. For example, from the point of view of the Welsh language, local authorities implement Welsh language standards in accordance with the Welsh Language (Wales) Measure 2011; some but not all local councils have language schemes in accordance with the Welsh Language Act 1993. An understanding of the nature of Welsh language standards should be consistent in the training of both types of councillors, however, but they should also understand the relatively different nature of the two types of obligation. In addition to an understanding of the standards and language plans, both types of councillors should receive language awareness training including an understanding of the status of the Welsh language in Wales and how they can, through their work, promote opportunities to use the language. Please see our bullet points above in question 74 in this regard.

76. If Strongly Agree or Agree to question 75, what proposals would you make for areas to be included in mandatory training?

Please see our responses to questions 74 and 75 from the point of view of the Welsh language. Considering the obvious role of councillors in their communities and their influence on decisions about everyday lives in their area it is necessary that they receive language awareness training that covers opportunities for them and others to promote the use of the Welsh language, as well as the statutory requirements on local councils and on some town and community councils. That would contribute positively to the Welsh Government's vision for the Welsh language in the Welsh Language Strategy 2050. It goes without saying of course that the training should be available in Welsh and in English for councillors across Wales.

77. If Strongly Agree or Agree that there should be mandatory training, do you consider candidates should be asked to confirm their willingness to undertake it as part of the nomination of candidates' process?

No comment.

78. Should there then be sanctions for candidates who do not confirm they are prepared to undertake mandatory training?

Yes

No

Don't know

Please explain your answer:

No comment.

79. Should a commitment to undertake mandatory training and development form part of the oath successful candidates must take before being able to take up their office?

Yes

No

Don't know

Please explain your answer:

No comment.

80. If Yes at Q79 what sanctions should apply to elected members for then not undertaking mandatory training and development?

No comment.

81. To what extent do you agree or disagree with the policy proposal to bring arrangements for Town and Community councillors into line with the disqualification regime for principal council members in Wales, so that members of Town and Community councils are disqualified from becoming a member of the Senedd?

Strongly Agree

Agree

Disagree

Strongly Disagree

Why do you say this?

No comment.

82. To what extent do you agree or disagree that the grace period for all councillors elected to the Senedd should be retained?

Strongly Agree

Agree

Disagree

Strongly Disagree

Why do you say this?

No comment.

83. To what extent do you agree or disagree with the approach to assessing the impacts of the proposals set out in the draft IIA? Do you have any comments?

Strongly Agree

Agree

Disagree

Strongly Disagree

Why do you say this?

We agree that it is possible that exploring requirements relating to the Welsh language in relation to Returning Officers could have a positive impact on the Welsh language as stated in the document. However, the white paper only asks only for the consultee's proposals and does not offer any proposals at all for doing so that their impact could be assessed or not. We also agree that it is possible that the proposals to reform the conduct of electoral and community reviews to give specific and earlier consideration and consultation with the public and stakeholders on the Welsh and English names of wards and communities could be positive from the point of view of the Welsh language. We look forward to continuing to discuss these issues with you and we look forward to seeing the content of the specific impact assessment on the Welsh language that will be carried out.

84. To what extent do you agree or disagree with the approach to assessing the costs and benefits of the legislative proposals set out in the draft RIA?

Strongly Agree

Agree

Disagree

Strongly Disagree

Why do you say this?

No comment.

85. Are there other areas that should be considered as we develop the IIA and RIA further?

No comment.

86. Please identify any other sources of data and information that we should consider in the IIA and RIA ?

No comment.

87. We would like to know your views on the effects that our proposals for electoral reform would have on the Welsh language, specifically on:

- opportunities for people to use Welsh, and
- on treating the Welsh language no less favourably than English.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Our response to this consultation focuses specifically on the impact of the White Paper's proposals on opportunities to use the Welsh language. We have marked 'no comment' in relation to questions that we do not believe are relevant to this. We have responded to questions mainly in relation to ward names (question 23); returning officers (42-44) and councillor training (73-76) where we propose ways to increase the positive effects on the Welsh language. We have also stated that all digital developments in the electoral field should be available equally in Welsh and English and that the Welsh language should not be treated less favourably than English when developing and providing these digital services to the public.

88. Please also explain how you believe the proposed policy could be formulated or changed so as to have:

- positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and

- no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Please see above.

89. We have asked a number of specific questions. If you have any comments on any related issues which we have not specifically addressed, please tell us below.

Name

Organisation (if applicable)

Email address

Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.