



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**

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Phase 1: Consultation Paper

8 November 2017

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# 1. Relationships between council and administration

## Introductory questions

- 1) Would you like your submission to remain anonymous?  
No
- 2) Postcode:  
6330
- 3) Who are you submitting on behalf of?  
Company/Organisation/Other
- 4) Local government name:
- 5) Organisation name  
Albany Ratepayers & Residents Association Inc.
- 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?  
It should include open, honest, transparent and accountable for decisions made. Council's role is to represent the majority. At no time should the Mayor or Councillors allow their own opinion or their own or others motives rule their decision.
- 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?  
Yes
- 11) How do you propose that these are improved?

That even though some people have different personalities it is important that they are given the same courtesy. There may need to be workshops that explain to both staff and Mayor and Councillors how important that they respect each other

## **Improving relationships between council and administration: Guidance question**

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

The Council need to ask more questions if they aren't sure of an issue. The Council could direct the CEO to acknowledge achievements or years of service by having a morning tea, even if it was only once a month, and presenting a certificate or similar. This should also be done for outside staff as well

## 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?

First and foremost a genuine love for their community. It is so important that they understand the feeling of the community and should not go in to Council with their own agenda in mind. It is said that they should have a business background. This isn't necessarily a good thing depending on the outlook of the Councillor. Communication with the community is also important.

- 14) Do these vary between local governments?

Yes

- 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)?

The course fees should be paid by Local Government but other fees should be paid by the individual. If there is a group going they could car pool and share hotel accommodation.

- 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?

Yes

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

It would be good if all local governments paid a fee each year specifically for small local governments to attend training that is relevant to their area. If the training is a important to all local governments then perhaps the fund

would be better used to send two or three representatives to each municipality. That would cut the costs

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

It is important that the Mayor and Councillors know how to listen and communicate. They may need training to do this. It would be good if it was available and they have to attend it as part of being elected.

## 2.3 Mandatory training

### Mandatory training: Guidance questions

19) Should elected member training be mandatory?

Yes

20) Why or why not?

This way the elected member gets a real understanding of their duties. It would be really good if it is explained that when elected they are there to represent the community and not as many think that they are elected to do what they think is best for the community

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

Yes

22) Should this be Compulsory?

Yes

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

No

24) If yes, how would this work?

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

Three months. If they don't understand by then they never will

## 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?

Voluntary unless it is proven that more development is needed

### Training: Guidance question

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

Communication skills. How to treat constituents. Importance of public consultation.

## 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.

All local governments should have the same standards as they are meant to be the representatives for each locality

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

Codes of conduct are required

The content of a code is prepared by a local government and approved by the Minister

The Minister's approval could prevent the imposition of improper or unclear requirements while maintaining local government autonomy

Increased burden on Department and Ministerial staff to assess draft codes

Increased red tape

Reduced autonomy for local governments

This the best as it keeps all the local governments accountable. Why couldn't a basic model be set up under this option. This would ultimately lessen the burden on Ministerial staff as there would be a basic format.

31) How should a code of conduct be enforced?

There should be a check list done randomly to make sure that the local governments are adhering to the Code of Conduct.

### 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?

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?

Yes

36) Is three months adequate?

Yes

### Revised disciplinary framework: Guidance questions

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

Yes

38) Why or why not?

It appears to be a better option to streamlining. It will hopefully help maintain integrity for the position that is held as elected members should be honoured that they have been voted into the position. It would be good if these could be added

misuse of information,

disclosure of interest, and

securing personal advantage or disadvantaging others.

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

Yes



### 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?

Yes

- 41) Please explain.

In the majority of circumstances it is necessary for information to stay confidential. However it should be a genuine reason and not just because council don't want a public backlash.

#### 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?

This would stop any collaboration between the council members and developers etc. It would be better if it was for two years because then most developments have to have started work within the two years or go back to council so this would hopefully stop any favouritism.

- 44) Should this restriction apply to former employees?

Yes

- 45) Please explain?

This would stop any collaboration between former employees and developers etc. It would be better if it was for two years because then most developments have to have started work within the two years or go back to council so this would hopefully stop any favouritism.

#### Confidentiality: Guidance question

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

Yes

- 47) Why?

In the majority of circumstances it is necessary for information to stay confidential. However it should be a genuine reason and not just because council don't want a public backlash.

### 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 seems that Qld has put a lot of thought into their review committee and there is quite a lot of it that WA could add to Option 2. Its a shame that there are so many complaints. There needs to be an investigation in to the Local Government's reason for all the complaints as part of solving the problem. Distance would be a problem for the Conduct Review Committee in Rural areas and if the complaint was from one of the smaller local government areas how would they afford to pay for the expenses?

49) What powers should the Conduct Review Committee have?

The powers to review the issue but investigate it and don't dismiss it as trivial unless validated.

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

Conflict of Interest where there is a direct benefit financially  
Serious misconduct by an elected member or staff member  
Misuse of confidential information

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?

There should be public expressions of interest place in the West Australian but also local rural papers.

The independent stakeholders could select the pool of members. There should be some clear rules about who can and can't apply for the positions

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

Five.

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

Yes

55) If not, what do you propose?

### **Review of elected member non-compliance: Guidance questions**

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

Option 2 as it would appear that Option 1 the Status Quo isn't working.

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

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?

Mediation is always worth pursuing when there is a conflict. Not all complaints will benefit by mediation unfortunately

### **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?

The Panel would only do this if it believed it was appropriate so therefore for the benefit of the council and the elected member it would be the obvious thing to do

How many meetings should the Panel be able to order the elected member not attend? It would depend on the severity of the complaint. A minimum of two months

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

No

64) Why

If the complaint is serious enough for the elected member to be ordered not to attend the meetings then why should they get sitting fees or allowances. Maybe the harsher penalties will deter the misconduct

### **Compensation to the local government: Guidance questions**

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

Yes

66) Why or why not?

It would depend on the circumstances

67) What should the maximum amount be?

A maximum of \$5,000.00

### **Complaint administrative fee: Guidance questions**

68) Do you support this option?

No

69) Why or why not?

It could stop the complainant from coming forward which could cause a culture to form within the Council

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?

It could stop the complainant from coming forward which could cause a culture to form within the Council

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

Nil

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

No

76) Why or why not?

### **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?

If they have been found to be in breach then they should pay the costs of the panel proceedings as part of their penalty.

## 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?

Local government is suppose to be open and accountable. Publishing the complaint and the result should be allowed.

## Tabling decision report at Ordinary Council Meeting: Guidance question

81) Do you support this option?

Yes

82) Why or why not?

Tabling the decision report at a Ordinary Council Meeting should be done as it is necessary for the public to be aware of the result

## 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?

The canvassing and information or perhaps pressure that the member provides could influence decisions so for transparency it would be more appropriate for the member not to be involved in the decision making.

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?

Members associated with art groups etc should not be involved involved in decision making for the same reason as non-profit organisations

## 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?  
The CEO would be selected for his/her capability
- 89) How could the recruitment and selection of local government CEOs be improved?  
Don't allow the Mayor/ President and a committee of a few Councillors make the decision.
- 90) Should the Public Sector Commission be involved in CEO recruitment and selection?  
Yes
- 91) If so, how?

Option 2 seems like the best option as it requires a council to include an experienced panel member from the Local Government Advisory Board and/or the Public Sector Commission and a peak body or public sector agency on the selection Panel.

Several entities may be suitable to perform the role of accrediting representatives: This could include the Department, the Local Government Advisory Board, or the Public Sector Commission.

- 92) Should other experts be involved in CEO recruitment and selection?  
Yes
- 93) If so, who and how?  
Ask for expressions of interest but have a criteria that the selection panel can use to decide any other members for the panel



94) What competencies, attributes and qualifications should a CEO have?

The CEO needs to be able to manage interactions between council staff and Councillors. The CEO needs to ensure appropriate policies, practices and protocols are in place and have a good understanding of local government.

The CEO needs to be approachable and able to communicate with the public, elected members and staff. The CEO has to have a clear understanding of how council is run and needs to be aware of the issues in the area.

## 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?

This should give a guideline for appointing the Acting CEO.

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

The full council should be voting at a special meeting not long after the CEO is appointed. The recommendation should be given by the CEO as he would be the one that would know who is most qualified. There should be two Acting CEOs in case one isn't available

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

Depending on performance the same as above. Otherwise apply for an Acting CEO through Local Government

## 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?

Not the elected members. Perhaps local government could create a performance panel that travels to different municipalities.

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

Review and assess performance and compare to previous review.

Ask what the CEOs expectations are for the next year?

What does the CEO feel has been achieved and what are the council objectives for the next year?

How is the CEOs interaction with elected members?

How is staff moral?

101) How often should CEO performance be reviewed?

Annually unless there is a poor result . In that case in 3 months.

102) Which of the above options do you prefer?

Option 1. It is important that the correct questions are asked. As the elected members work close with the CEO it is the reason why they shouldn't be part of the performance reviews. A suggestion is that the review panel could send a survey asking for the performance of the CEO to each elected member to be returned to the panel. It would be easier for the CEO to answer questions without feeling uncomfortable.

103) Why?

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

## 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?

Yes

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

3-6 months

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

12 months

108) Should there be any exceptions to this?

Only if the contract is due to expire within that time and needs to be renewed.

## 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?

If the person has a criminal record ( while everyone deserves a second chance it is important know the record)

If the person has a drug problem.

### Strengthening local government administration: Guidance question

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

It would be good if staff are acknowledged for achievements such as number of years service. A morning tea once a month that brings everyone together is also good for moral. A little recognition goes a long way

## 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?

It would be more transparent as to have either of the other suggestions could be seen as bias

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.

Someone looking from the outside in can sometimes see a clearer picture and can make assessments without bias.

117) Who should pay for the appointed person?

Local Government

118) Why?

If everything was functioning as it should there would be no need for the intervention

### Powers of appointed person: Guidance question

119) What powers should an appointed person have?

The ability to mediate

make recommendations to the CEO, council and the Dept of Local Government

Able to address the issues and make recommendations on how to resolve the problems

Have some knowledge of procedures and policies.

### **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 will help to make local government more accountable and at the same time give assistance if needed. As the economy gets tighter there is a need for local government to set an example and stop wasteful spending. This will hopefully achieve this

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

the ability to communicate and mediate

An understanding of how local government works

### **Supporting local governments in challenging times: Guidance question**

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

There should be more interaction between the admin and outside workers. There appears to be a clear divide between them. It is so important that the staff feel a part of an organisation. Local Government needs to do more PR as well as good governance

## 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?

Continuance. It is so important.

### 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?

There are negatives and positives to this.

## 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?

Yes

129) If not, why?

130) Is the threshold of \$500 appropriate?

No

131) If no, why?

its too high Gifts to \$100.00

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

Yes

133) Why or why not?

The recipient of the gift should know what is suitable to accept.

134) If yes, what gifts should be prohibited?

Anything that can compromise Australia's security

#### 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?

If in doubt declare it



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?

\$ 500.00 seems a lot. 2 gifts \$1,000. There should be no worries to disclose any gift.

## 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 1

Why?

In rural areas not everyone is able to get access to the internet so the paper is the best way

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

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Section 5.100      Payments for certain committee members

Both

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Functions and General Regulations 17      Tenders register

Both

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Section 5.94 & Administration Regulations 29      Register of delegations to committees, CEO and employees

Both

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Minutes of council, committee and elector meetings

Both

---

Future plan for the district

Both

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Annual Budget

Both

---

Notice papers and agendas of meetings

Both

---

Reports tabled at a council or committee meeting

Both

---

Complaints register (concerning elected members)

Both

---

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

Both

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**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?

Aren't aware of any other information that is available in other jurisdictions but if there is it should be available to all municipalities

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

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

- 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?

## 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?

The local government needs to provide more information. It needs to be advertised more often if its public consultation especially.

Special meetings need to be advertised better .

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	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

Proposal	Should this be made available: No, optional, required?
Website to provide information on differential rate categories	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?

Elected members allowances

### Expanding the information available to the public: Guidance question

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

State wide notices in local papers as well if relevant to the area. Example the workshops for this process no one knew about them .They were advertised in the West. Country people tend to buy local



## 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?

Yes

161) Why or why not?

If it very rarely used then there really is no need to retain it.

## 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?

It has been clearly noted that the staff is the responsibility of the CEO. Elected members have little to do with them. It would be more appropriate for the CEO to get a performance panel if he needs assistance.

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

Yes

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

The definition shouldn't be based on age but years of service and experience

## 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?

The AASB requirements introduce consistency between local governments and private entities, and therefore strengthen accountability.

## 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?

Yes

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?

No

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

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?

Yes

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?

## 11.1 Risks and benefits of borrowing

### Regional subsidiaries: Guidance questions

175) Which option do you prefer?

Option 1: Status quo

176) Should regional subsidiaries be allowed to borrow money other than from the member councils?

Option 1: Status quo

177) Why or why not?

With the economy the way it is smaller councils may get in debt and not be able to pay it back. Hopefully there are other ways they can raise funds

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.