28th March 2013

Dear Mr Jones

**Cardiff Partnership Response: - Proposals to simplify legislation and strengthen LSBs within the Sustainable Development Bill**

The Cardiff Partnership welcomed the opportunity to comment on the White Paper proposals for a Sustainable Development Bill and formally responded to the Welsh Government earlier this month.

Our response emphasised the importance of collaboration in achieving shared outcomes. As you will be aware, the new approach to collaboration in Cardiff provides clear governance arrangements for partnership working. In this way, we strengthened our partnership governance framework and secured better decision making to improve wellbeing in the city.

The Partnership welcomes the recognition within the Bill that public service providers are required to work together at community, local and regional levels in order to achieve shared outcomes. This level of collaboration is essential to achieving the outcomes that matter most to citizens.

We therefore strongly endorse the proposals to strengthen the role of Local Service Boards and simplify the legislation relating to partnership working. The comments below relate to the specific proposals highlighted in the discussion paper.

**Community leadership role of local government**

The Cardiff Partnership supports the recognition of the community leadership role of local government in convening the strategic partnership arrangements and preparing an integrated plan. However, the duty should also be expanded to include the requirement for the other named statutory partners (i.e. Health and Police) to ensure that there is full engagement with the process. In addition there also needs to be a balance between what it is appropriate to include in the proposed legislation and what is more appropriate to be included in guidance documents to provide some element of flexibility to accommodate local approaches and innovation.
There should also be recognition that the secretariat support required for facilitating and developing the plan carries a substantial resource implication—particularly in terms of officer time—which needs to be balanced against the ongoing reduction in budgets going forward.

**The requirement to prepare an Integrated Plan**
The Cardiff Partnership supports the proposal that the responsibility for preparing and adopting an integrated plan should rest with the named statutory partners; the local authority, health and the police. However, there should also be clear expectations that the third sector, other partners such as Community Councils and also communities themselves are given an opportunity to actively engage in the process.

We would prefer therefore that the Plan has a more clearly defined title such as “Area Strategy” given that proposed title of a “Well-being Plan” does not reflect the strategic or geographical nature of the document.

**Local Service Board – membership, area covered, operation and broad functions**
The Cardiff Partnership welcomes the proposed flexibility which allows local determination of arrangements to reflect the needs of an area. It is important that any partnership mechanisms are manageable in their size to enable effective consideration of key issues as well as ensuring appropriate strategic decision making capacity.

Cardiff further welcomes the opportunity to convene joint arrangements for collaborative working and commissioning to deliver shared outcomes. Again, these arrangements should be subject to local discretion in response to any business case which demonstrates the benefits of collaborative working.

Whilst it is recognised that the local authority would have a duty to provide secretariat support there needs to be an acknowledgement that there are resources required to be able to undertake this role effectively. It should also be highlighted that whilst reference is made within the discussion paper to previous funding incorporated into the Revenue Support Grant, it should be understood that these budgets have also been subject to the year on year reductions which local authorities have had to introduce in view of the current economic climate to meet the demands of statutory provision. In addition, there have also been both growing demands on existing services and the introduction of increased legislative requirements on partners which often do not come with any additional resources. Certainly the Welsh Government’s LSB Development Grant has been a welcomed resource in facilitating the significant progress which has been made in Cardiff and there is concern that this will end in 2014/15. Inevitably, the ability to provide partnership support will be a continuing challenge going forward if this funding does not continue.
The LSB
The Cardiff Partnership supports the proposed functions highlighted within the discussion paper. However, we would also like to highlight that one of the most important roles of LSBs when they were set up was to unblock barriers to change. It is critical that LSBs are not expected to adopt or oversee every new agenda or initiative being directed towards them so as they become subsumed by a mass of information requiring reactive responses. Most of the key issues should be considered by individual partners or services as part of the ‘day job’ and it is only the key priorities which require strategic leadership which should be the focus of LSBs.

Strategic Needs Assessment
The Cardiff Partnership firmly believes that one strategic needs assessment should be undertaken and all LSB members should be jointly required to inform its development. This assessment should also form the evidence base for other policies and programmes which local partners are required to develop.

The making of the Plan
The current position is that the Single Integrated Plans (SIPs) and Local Development Plans are being prepared on different timescales which makes it difficult for them both to stand alongside each other. There also needs to be recognition that the LDP in its ‘preferred strategy’ stage is looking at strategic land-use implications whilst the SIPs can drill down into very localised issues in response to the priorities highlighted in the needs assessment. However, despite these practical challenges the Cardiff Partnership supports the fact that the issues and inequalities highlighted by the SIP should be factored in to the planning framework so as sustainable communities are promoted in any future developments.

Consultation, engagement and participation
The Cardiff Partnership supports the list of named consultees identified but would suggest that representatives of the third and private sectors should also be included.

Adoption and management of the Wellbeing Plan
The Cardiff Partnership agrees that there should be alignment between the SIP and the Corporate Plans of LSB organisations. An outcomes based methodology should also form the basis for performance management of delivery.

Reporting
The Cardiff Partnership supports an annual review process which enables an assessment of progress to be undertaken and also to review the partnership’s priorities in light of any changing demands.

Accountability
The mechanism for Scrutiny of the SIPs and partnership working should be determined locally with regard to whether this should be done by existing Local Authority Committees or by a separate LSB Scrutiny Panel.
Timing and Review
Proposals to align the strategic planning cycle with the local electoral cycle would represent a progressive step forward. A new administration will clearly be elected on the platform of manifesto commitments, and it is important that local delivery arrangements reflect these priorities. This is significant because partnership arrangements must accommodate and reflect the local democratic process and recognise local members as important representatives of local views.

Role of Auditor General Wales
Whilst the Cardiff Partnership recognises the important work undertaken by Regulators and Inspectorates, there needs to be a joint inspection programme established to avoid duplication of effort with regard to reviewing partnership working. Currently a number of regulators consider many of the same partnership issues which involve a large number of staff. Cardiff Partnership would not wish to see this proposal becoming a further layer of inspection which places yet another burden on public services. The role of the Auditor General Wales in considering LSBs also needs to be reviewed in light of the work which Scrutiny will be undertaking and what extra value will be added.

Simplification
The Cardiff Partnership welcomes the Minister’s approach to simplifying the legislation that underpins partnership working and strengthening the role of LSBs. It represents an important step forward in unlocking local capacity to collaborate more effectively to achieve shared outcomes.

We trust you will find this response useful and we look forward to working with the Welsh Government in taking this important agenda forward.

Yours sincerely

Councillor Heather Joyce
Leader of Cardiff Council and
Chair of the Cardiff Partnership Leadership Group