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Llywodraeth Cymru
Welsh Government

Welsh Government
Consultation Document

Effective Partnership Working in Bridgend

Proposed Health Board Boundary Change to align
decision-making across Health and Local Government

Date of issue: 13 December 2017
Action required: Responses by 7 March 2018

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

Overview

This consultation seeks views on a proposal that healthcare services for people in the area of Bridgend County Borough Council should be provided by Cwm Taf University Health Board instead of Abertawe Bro Morgannwg University Health Board to align decision-making across health and local government.

How to respond

The closing date for responses is **7 March 2018**.

Responses can be submitted via the online document of consultation questions:

<https://consultations.gov.wales/consultations/proposed-health-board-boundary-change-bridgend>

To respond to the consultation, please either complete the online form or request the accompanying questionnaire and return it either by email either to:

PartneriaethauEffeithiol@llyw.cymru

or

EffectivePartnerships@gov.wales

or by post to:

Effective Partnerships
Floor 1
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

This consultation document can be accessed from the Welsh Government website at:

<https://consultations.gov.wales/consultations/proposed-health-board-boundary-change-bridgend>

Data protection

How the views and information you give us will be used

Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about. It may also be seen by other Welsh Government staff to help them plan future consultations.

The Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name or address published, please tell us this in writing when you send your response. We will then blank them out.

Names or addresses we blank out might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information.

Foreword

We are grateful to the many individuals and organisations that took the time to respond¹ to the White Paper 'Reforming Local Government - Resilient and Renewed'², helping us to shape our proposals for the future of local government in Wales.

The proposed health board boundary change set out in this consultation has been developed, following the responses to that White Paper, to support effective partnership arrangements and decision-making across public services serving people in the Bridgend County Borough Council (Bridgend CBC) area.

In order to best meet people's needs and expectations, to secure the best outcomes for people locally, regionally and in Wales, we believe public services need to be able to work together effectively. While boundaries should not be a barrier to delivering the outcomes Wales needs, unnecessary complexity, especially in decision-making, can make this more difficult and limit opportunities to serve the public even better.

Continued austerity means reform is essential if local public services are to be financially resilient, able to maintain and improve the quality of their services and to be innovative and responsive to our changing world. Strong partnership arrangements between Bridgend CBC, Abertawe Bro Morgannwg University Health Board (UHB) and other authorities are delivering improved public services for people across Bridgend and South Wales.

Our intention for this proposed change is to provide clarity and consistency for more effective leadership and partnership; supporting the ambitions of Bridgend CBC in its strategic partnership arrangements for local authority functions as part of the Cardiff Capital Region City Deal. It is set in the context of our ongoing ambitions for effective efficient and high quality health services across South Wales and consistent with our broader ambitions for resilient and renewed local government.

We are grateful to the leaders of Bridgend CBC, Abertawe Bro Morgannwg and Cwm Taf UHBs for their engagement and commitment in the development of this consultation. We will continue to work closely with our partners and are inviting views on the proposal to ensure all aspects of the proposal are properly and openly explored.

I hope you will respond to this consultation on both the principle of the boundary change and the key practicalities of taking it forward.

Alun Davies,
Cabinet Secretary for Local Government and Public Services

Vaughan Gething,
Cabinet Secretary for Health and Social Services

¹ https://consultations.gov.wales/sites/default/files/consultation_doc_files/170804-resilient-and-renewed-summary-reportv2-en.pdf

² https://consultations.gov.wales/sites/default/files/consultation_doc_files/170130-white-paper-en.pdf

Summary

This consultation seeks views on a proposal that healthcare services for people in the Bridgend CBC area should transfer across to Cwm Taf UHB from Abertawe Bro Morgannwg UHB; moving the health board boundary accordingly.

The purpose of the proposed change is to ensure more effective partnership working and decision-making across South Wales within the broader ambitions for local government reform and the existing regional health planning forums.

Local government reform aims to make local government more effective and resilient in the planning and delivery of services. Most authorities in Wales work in partnerships with the same authorities across economic activity, health services and other local authority functions. Uniquely, Bridgend CBC works with local authorities in south east Wales in driving economic activity, but must work with local authorities in south west Wales within the Abertawe Bro Morgannwg UHB area for healthcare services.

If implemented, the change would ensure that Bridgend CBC was not disadvantaged by working across two strategic footprints as regional working firms up. It would establish Bridgend CBC within the south east Wales regional footprint for healthcare provision and social services complementing existing economic and education partnerships. It would mean that Bridgend CBC's partnership arrangements will be broadly comparable with all other local authority partnership arrangements in Wales.

The proposal is for administrative change; not service change. However, it would align strategic leadership for local authority functions enabling greater opportunities to improve services. Simpler more coherent partnership arrangements are expected to deliver better outcomes for people and communities across Bridgend CBC and its partner authorities.

Partnership Working

Our ambitions to improve and reform our public services, and build the united, connected and sustainable Wales were set out in our 5 year Programme for Government: Taking Wales Forward.

In September 2017 we published a national strategy, Prosperity for All, which set out how our key commitments fit with the work of the wider Welsh public service to lay the foundations for achieving prosperity for all.

We are continuing to develop a partnership approach to the provision of public services, working within the legislative framework of the Well-being of Future Generations (Wales) Act 2015 and towards clear wellbeing goals for public services. Integration and collaboration between services, focussed on early intervention, are essential to delivering sustainable long-term outcomes that can only be achieved by working together. The legislative framework of the Social Services and Well-being (Wales) Act 2014 is also driving the principles of integration, collaboration, prevention and a focus on people's wellbeing in health and social care.

Ensuring that public services are equipped to achieve these aims and ambitions means establishing complementary working partnerships that are more effective at joining up across boundaries.

In doing so the Welsh Government is seeking to ensure clarity and consistency in working arrangements for all local authorities.

Our aim is to build resilience and support renewal in local government so local people and communities are supported to thrive and are able to meet the challenge of continuing financial austerity.

As the White Paper recognised there is a particular issue for Bridgend CBC which currently works in partnership on the two key strategic and overlapping footprints across South Wales.

To summarise the key current partnerships (explored in more detail at Annex A):

- healthcare services are provided by Abertawe Bro Morgannwg UHB with partner authorities across Swansea Bay;
- integrated health and social care is provided through the Western Bay regional partnership board, in partnership with Neath Port Talbot Council and Swansea City Council, Abertawe Bro Morgannwg UHB and other partners;
- Bridgend CBC is integrated into the Cardiff Capital Region for economic activity working with local authority partners across south east Wales, none of which have healthcare services provided by Abertawe Bro Morgannwg UHB;
- education improvement services are provided in partnership with Rhondda Cynon Taf Council and Merthyr Council³, the two local authorities that have their healthcare services provided by Cwm Taf UHB.

These arrangements mean that Bridgend CBC must develop and maintain strong and effective relationships with a relatively high number of partners⁴.

Following the formal consultation on local government reform, the Welsh Government has engaged in discussion with leaders at Bridgend CBC, Cwm Taf and Abertawe Bro Morgannwg UHBs about current partnership arrangements.

Led by those discussions, the Welsh Government has concluded that the current arrangements have a number of risks for Bridgend CBC and its key partners. The key risks are considered to be:

- the capacity of elected members to engage in effective partnerships is spread over two extensive strategic partnerships, stretching the ability to develop relationships and influence strategic directions;
- scrutiny and democratic participation is more complex than it needs to be and it is more difficult for members of the public, or other organisations to understand where decisions are made;
- there is added complexity in decision-making and governance; and senior officer time is disproportionately taken up with managing increasingly different relationships;
- as the City Deal and other partnership arrangements continue to develop and social services and health integration is strengthened, it will become increasingly

³ As part of the Central South Consortium Joint Education Service (CSC). Cardiff City Council and the Vale of Glamorgan Council are also key partners in the CSC, and have their healthcare services delivered by Cardiff and the Vale University Health Board.

⁴ Key partners include the 9 other councils in the Cardiff Capital City Region City Deal, Swansea City Council and Neath Port Talbot City Council and Abertawe Bro Morgannwg University Health Board. These and other relationships will also then include other partners, such as in the voluntary sector.

challenging for Bridgend CBC to influence partnership arrangements and services on the basis of existing arrangements;

- difficulties in dealing with separate partnership arrangements for related policy areas. For example under current partnership arrangements social care and education services are provided on separate strategic footprints. Services such as youth offending and additional learning needs amongst others need to engage with education and social care. Better alignment of these services is considered to be beneficial.
- as partnership working, including the City Deal, becomes more established over time, the particular challenge for Bridgend CBC is expected to become more pronounced.

Health boards

In addition to their partnership working with other public bodies, some of which is described above, significant work has already been undertaken to determine the effective provision of some key emergency and hospital-based services across health boards in South Wales (referred to as the former South Wales Programme).

This partnership approach continues through regional health planning forums whereby services for the Bridgend population are considered alongside those currently in Cwm Taf, Cardiff and Vale and Aneurin Bevan UHBs.

The former South Wales Programme (made up of the five South Wales health boards - Abertawe Bro Morgannwg, Aneurin Bevan, Cardiff and Vale, Cwm Taf and Powys - working with the Welsh Ambulance Service) undertook a significant public consultation in 2013/14 on changes necessary to create safe and sustainable hospital services for people living in South Wales and south Powys.

It is important to acknowledge that any health board boundary change will not re-open the decisions made as part of the South Wales Programme. The boundary change is being proposed to support effective leadership, partnership working and decision making; it is not about changes to service delivery.

The ongoing joint working between health boards is focussed on improving care for all patients, particularly those people who need to be seen by the most experienced clinicians and doctors as soon as they arrive at hospital.

In addition, agreements in place between health boards mean that services and support for patients often cross health board boundaries in order to ensure better outcomes for patients. This would continue regardless of the proposed change set out in this consultation.

Legislation

If this proposal is pursued, the Local Health Boards (Establishment and Dissolution) (Wales) Order 2009 would require amendment to alter the principal local government areas for which AMBU and Cwm Taf Local Health Boards are established.

In establishing new partnerships and making the proposed boundary change, there would be a change to the footprint of both Abertawe Bro Morgannwg and Cwm Taf UHBs that would have corporate implications for both organisations.

There is a significant body of work which we would need to undertake with the two health boards to determine where liabilities lie, and which assets, contracts and staff would need to be transferred. Considerable input would be needed from both ABMU and Cwm Taf to identify assets and agree how they will be allocated. Once agreed, the required changes would be put into effect through Transfer Orders.

The boundary change would also necessitate consequential changes to other pieces of health secondary legislation. For example, the Community Health Councils (Constitution, Membership and Procedures) (Wales) Regulations 2010 (“the 2010 regulations”) provide that Community Health Council (CHC) members are appointed, and local committees are established, for each local authority area that falls within their area. If the boundary is changed, the 2010 regulations would need to be amended to change the local authority areas for ABMU and Cwm Taf CHC. The Welsh Government will work with the local CHCs to explore the practical implications associated with any consequential changes.

Proposed Change

Based on the reasoning set out in this consultation the Government proposes that the most effective way to ensure Bridgend CBC is not disadvantaged by multiple-strategic partners is to have healthcare services for people in the Bridgend CBC area planned, secured and delivered by Cwm Taf UHB instead of Abertawe Bro Morgannwg UHB; moving the health board boundary as illustrated on page 12.

This would be intended to simplify arrangements, establish more congruous partnerships across economic activity and health services, and support the strengthening of regional partnership arrangements. It is not intended to change frontline service delivery.

The proposal also means changes in partnership arrangements for local authorities within the Health Board areas; specifically Swansea and Neath Part Talbot in ABMU Health Board area and Rhondda Cynon Taf and Merthyr Councils in the Cwm Taf Health Board area.

Consultation Questions

Question 1: Do you agree that changing the health board boundary would strengthen partnership working arrangements for Bridgend County Borough Council, local authorities and other partners across both the Cardiff Capital Region and the Swansea Bay area?

Question 2: Are there any issues, benefits or risks particular to the proposed boundary change that are not considered in this consultation or that you would like to comment on?

The Social Services and Well-being Act 2014

The Social Services and Well-being (Wales) Act 2014 and related Regulations provide for Bridgend to be a member of the Western Bay Regional Partnership Board. This includes partnership arrangements for population assessments, area plans, pooled budgets (including in relation to care home accommodation functions by April 2018) and Integrated Family Support Teams. Regulations made under the Act also provide for Bridgend CBC to be part of the Western Bay safeguarding board area.

Changes to these regulatory requirements will depend upon the outcome of the consultation. If a decision is made, following the consultation, for Bridgend CBC to align with the Cwm Taf UHB area, a number of consequential amendments will need to be made to Regulations and statutory guidance in relation to the functions referred to above, to reflect the boundary change.

The Welsh Government will continue to discuss transitional arrangements with regional partners in Western Bay and Cwm Taf UHB in relation to these issues. We will seek to minimise disruption for Bridgend CBC and its partners as far as possible.

Consultation Questions

Question 3: If the boundary change is implemented, regulations under the Social Services and Well-being (Wales) Act 2014 will also need to be revised to re-align regional partnership boards and partnerships safeguarding children and adults at risk. Are there any issues you would like to raise about consequential changes to Regulations under the Social Services and Well-being (Wales) Act?

Question 4: Are there other Regulations or provisions under the Social Services and Well-being (Wales) Act or other legislation which should be considered for amendment if the proposed Heath Board boundary change is implemented?

Timing

The Health Boards and Bridgend CBC have indicated that certainty about the decision to change the boundary is in the best interests of the public and staff and are committed to engaging effectively with the public, trade unions and staff during the consultation period and beyond.

There are practical implications for Bridgend CBC and other councils in managing the transition from joint working on social services with councils within the Abertawe Bro Morgannwg UHB area to working in new arrangements with fellow councils in the Cwm Taf UHB area. Some of these changes may also affect other partners, for example in voluntary and other organisations. As described above, there are also significant implications for the Health Boards. Such changes need time to plan and implement.

At the same time, whilst we have not proposed that the boundary change is dependent on progress of the local government reform programme, certainty over the future of joint working for Bridgend CBC is important to clearly progress the planned Local Government Bill.

As set out above, there would be significant work for Health Boards in the subsequent transfer of staff, assets, contracts and information to be incorporated into a different corporate structure. There will be some complexity in the decision-making process and ensuring central corporate functions are maintained by Abertawe Bro Morgannwg UHB during the change, should the boundary change be agreed.

The Welsh Government recognises that our dedicated public service workforce is our most valuable public service asset. Providing certainty in future structures is important for corporate planning purposes and for public service workers delivering key public services.

For these reasons, it is proposed that the decision on the proposed boundary change should be made in Spring 2018 preceding introduction of the Local Government Bill into the Assembly. If agreed, there is, however, a choice to be made on the date for the boundary change, and associated Transfer Orders to take effect. In considering the options the need for time for the relevant transfers to be organised needs to be balanced against prolonging uncertainty in delaying the change.

If agreed, it is proposed that the changes come into effect on 1 April 2019 so that they are aligned with the financial year for consistency with budget setting processes.

Maintaining alignment with the financial year, a further option would be for the changes to come into effect on 1 April 2020 if it was considered more work would be necessary.

Consultation Questions

Question 5: Do you consider that the 1 April 2019 for the boundary change to take effect is realistic and achievable?

Impact Assessment

A Welsh Language Impact Assessment and Equality Impact Assessment have been produced and are published alongside this consultation on the Welsh Government's website at <https://consultations.gov.wales/consultations/proposed-health-board-boundary-change-bridgend>

Extensive engagement has also been carried out as part of the White Paper and earlier policy development on the local government reform programme. The White Paper and the related impact assessments can be found at:

<https://consultations.gov.wales/consultations/reforming-local-government-resilient-and-renewed>

The rights of the child were considered through the Welsh Government screening process, which measures the impact on children, young people and their rights. It is considered that the proposal will have no direct impact on the rights of the child; therefore a full impact assessment has not been undertaken.

Consultation Questions

Question 6: The Welsh Language Impact Assessment published alongside this consultation paper outlines the Welsh Government's view of the effect of the proposal on the opportunities for people to use the Welsh language and treating the Welsh language no less favourably than the English language. In relation to the proposals set out in this consultation:

a) Are there any positive or adverse effects?

b) Could the proposal be re-formulated so as to increase the positive effects or reduce any possible adverse effects?

Question 7: The Equalities Impact Assessment published alongside the consultation outlines the Welsh Government's view of the effect of the proposals on protected groups under the Equality Act 2010. The Welsh Government seeks views on that assessment.

a) Are there any other positive or adverse effects not identified in the assessment?

b) Could the proposals be re-formulated so as to increase the positive effects or reduce any possible adverse effects?

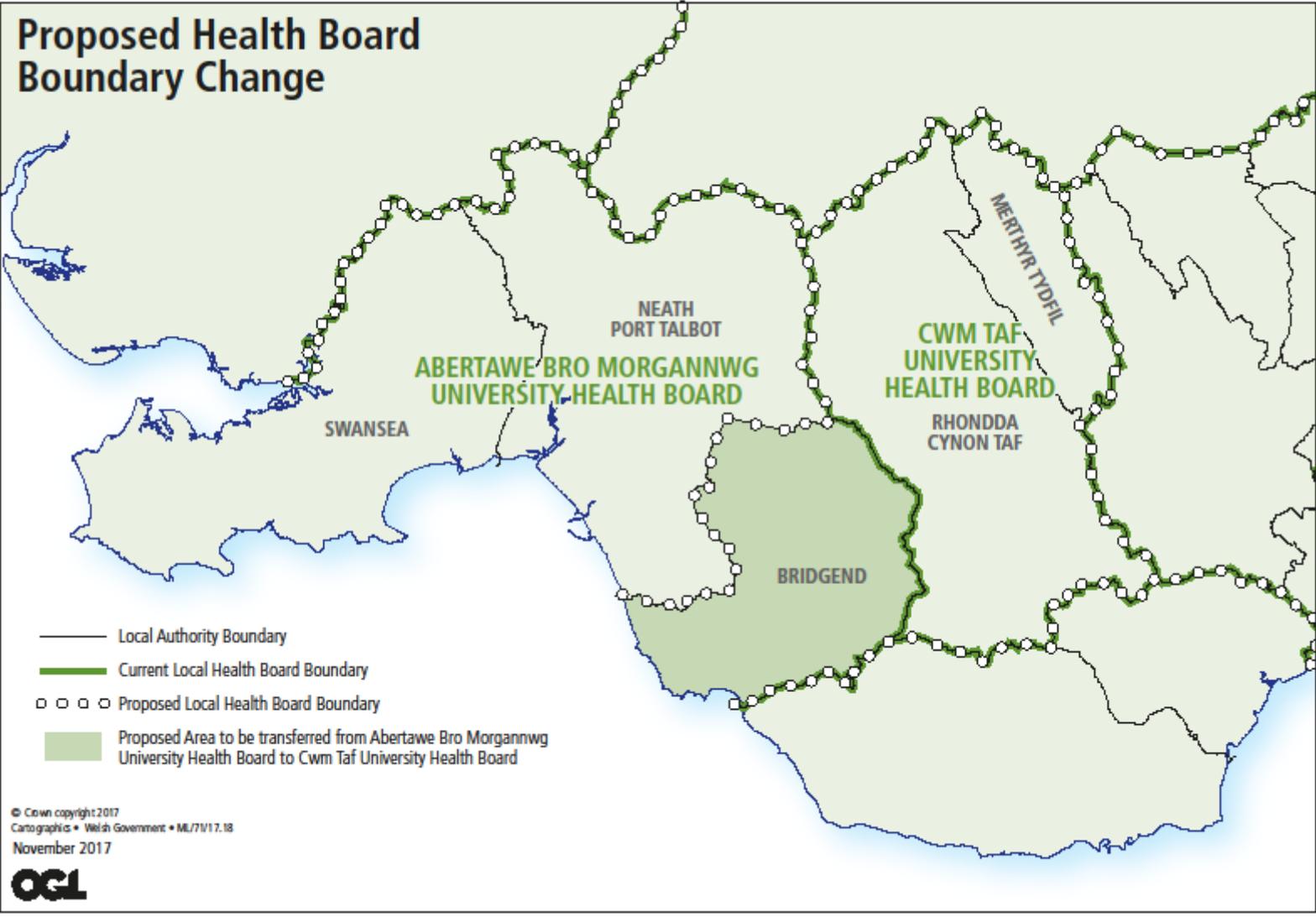
Conclusion

We are grateful to the leaders of Bridgend CBC, Abertawe Bro Morgannwg and Cwm Taf UHBs for their engagement and commitment to date. We will continue to work closely with our partners to ensure all aspects of the proposal are properly and openly explored.

Any changes we decide to pursue will continue to be steered by our partners as well as the views of the people of South Wales who use and shape the public services in the area. Maintaining standards in health services will be our primary consideration. As outlined, the proposed change is about effective leadership, partnership and decision-making, it is not about changing local health services. The arrangements put in place through the South Wales Programme will continue to be the driver for building resilience and capacity in the delivery of particular and specialist health services across the region. Health outcomes will continue to drive decision-making and joint-working arrangements across Health Boards to deliver seamless local services.

Both the Welsh Government and our partners consider that making the boundary change will address some of the key challenges for Bridgend CBC. The proposal set out in this consultation document is about establishing a strong foundation for future partnership working and delivering consistency and simplicity in the new arrangements. We believe that strong regional working is a cornerstone of delivering prosperity for all and driving forward economic development in the Swansea Bay and Cardiff Capital Regions.

Responses are welcome on the principle of the boundary change, and any potential benefits and risks as well as any other aspects of the proposal you would like to raise.



Annex A: Bridgend County Borough Council - Detailed partnership arrangements

| | |
|-----------------------------------|---|
| <p>Economic Activity</p> | <p>Recognising that delivering growth and prosperity needs collective action on sufficient scale, City Deals have been developed in Swansea Bay and in the Cardiff Capital City region.</p> <p>Bridgend CBC naturally aligns with the Cardiff Capital Region City Deal⁵ on the basis of established patterns of economic activity and historical alignment driven by common economic and other interests.</p> <p>Within the Cardiff Capital Region Bridgend CBC is working collaboratively with nine other local authorities across south east Wales to develop stronger and more effective leadership across the region. It is expected that stronger partnership working across the Cardiff Capital Region will enable local authority leaders to join up decision making, pool resources and work more effectively with businesses.</p> <p>Within the Cardiff Capital Region, healthcare services across nine local authorities are secured, planned and delivered either by the Cwm Taf UHB, the Cardiff and Vale UHB or the Aneurin Bevan UHB.</p> <p>Bridgend Council is the only local authority within the Cardiff Capital Region that has healthcare services secured, planned and delivered by Abertawe Bro Morgannwg UHB.</p> |
| <p>Education</p> | <p>Good education and skills development are key to driving improvements in prosperity and quality of life for people in the region. Bridgend CBC is responsible for education in schools and is part of the Central South Education Improvement consortium.⁶</p> <p>The other partner local authorities within the Central South Education Consortia make up the current Cwm Taf UHB footprint and the Cardiff and Vale UHB footprint.</p> |
| <p>Health and Social Services</p> | <p>The seven health boards in Wales plan, secure and deliver healthcare services for their areas. Social Services are local authority led and include a range of services that provide support to vulnerable people in need, including those with physical or mental disabilities, children in need of care and protection and people experiencing chronic ill-health and those who care for them. Social Services work closely with other local authority departments and agencies, including local NHS services and voluntary organisations, in delivering help and support in the form of services such as education teams, community drug and mental health teams, child-protection services and services for the</p> |

⁵ The Cardiff Capital Region City Deal includes the following local authorities: Blaenau Gwent, Bridgend, Caerphilly, Cardiff, Merthyr Tydfil, Monmouthshire, Newport, Rhondda Cynon Taf, Torfaen, Vale of Glamorgan

⁶ The Central South Consortium include the following local authorities: Bridgend, Cardiff, Merthyr Tydfil, Rhondda Cynon Taf, Vale of Glamorgan.

elderly.

Recognising that effective partnership working and integration between health and social services is essential to deliver seamless care and support, the Social Services and Well-being (Wales) Act 2014 made provision for transforming integrated and sustainable care and support services and their delivery. Seven regional partnership boards have been established under the Act, on the health board footprint, which bring together health boards, social services, third sector, citizens and other partners. These boards must jointly assess, plan and deliver efficient and effective services. Their purpose is to improve the outcomes and well-being of people with care and support needs, and carers who need support.

The Social Services and Well-being (Wales) Act also introduces a strengthened, robust and effective partnership approach to safeguarding adults and children at risk. This includes regional safeguarding boards and the National Independent Safeguarding board. The continuing expansion of integrated care - which puts patients, their carers and families at the heart of services – remains a key priority for Welsh Government and for both the NHS Wales and Welsh local government.

Under the Social Services and (Well-being) Wales Act 2014, Bridgend Council is part of:

- the Western Bay regional partnership board, (with Neath Port Talbot County Borough Council, Swansea City and County Council and Abertawe Bro Morgannwg University Health Board); and
- the Western Bay Safeguarding Board Area (with Neath Port Talbot County Borough Council and Swansea City and County Council).

Decisions about health services and the delivery of those services in the Western Bay area are the responsibility of Abertawe Bro Morgannwg UHB, however some decisions relating to integrated working are made by the regional partnership board.

Prosperity for All emphasises social care as one of five priority areas with specific actions for improving the life chances of children in care, adopting a child centred approach through the collaboration of education, social services and others.

Our joint three year education and social services plan for raising the ambitions and education attainment of children who are looked after in Wales recognises that social and education services have to work more closely together, and there is ever greater emphasis on stronger multi-agency and whole system approaches.

Consultation Response Form

Your name:

Organisation (if applicable):

email / telephone number:

Your address:

Consultation Questions

Question 1: Do you agree that changing the health board boundary would strengthen partnership working arrangements for Bridgend County Borough Council, local authorities and other partners across both the Cardiff Capital Region and the Swansea Bay area?

Yes/No

Please comment here:

Question 2: Are there any issues, benefits or risks particular to the proposed boundary change that are not considered in this consultation or that you would like to comment on?

Yes/No

Please comment here:

Question 3: If the boundary change is implemented, regulations under the Social Services and Well-being (Wales) Act 2014 will also need to be revised to re-align regional partnership boards and partnerships safeguarding children and adults. Are there any issues you would like to raise about consequential changes to Regulations under the Social Services and Well-being (Wales) Act?

Yes/No

Please comment here:

Question 4: Are there other Regulations or provisions under the Social Services and Well-being (Wales) Act or other legislation which should be considered for amendment if the proposed Heath Board boundary change is implemented?

Yes/No

Please comment here:

Question 5: Do you consider that the 1 April 2019 for the boundary change to take effect is realistic and achievable?

Yes/No

Please comment here:

Question 6: The Welsh Language Impact Assessment published alongside this consultation paper outlines the Welsh Government's view of the effect of the proposal on the opportunities for people to use the Welsh language and treating the Welsh language no less favourably than the English language. In relation to the proposals set out in this consultation:

a) Are there any positive or adverse effects?

Yes/No

Please comment here:

b) Could the proposals be re-formulated so as to increase the positive effects or reduce any possible adverse effects?

Yes/No

Please comment here:

Question 7: The Equalities Impact Assessment published alongside the consultation outlines the Welsh Government's view of the effect of the proposals on protected groups under the Equality Act 2010. The Welsh Government seeks views on that assessment.

a) Are there any other positive or adverse effects not identified in the assessment?

Yes/No

Please comment here:

b) Could the proposals be re-formulated so as to increase the positive effects or reduce any possible adverse effects?

Yes/No

Please comment here:

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: