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Local Government, Housing & Climate Change and Rural Affairs



Llywodraeth Cymru
Welsh Government

Mr Adrian Crompton
Auditor General for Wales
Audit Wales
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Tyndall Street
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3 June 2024

Dear Auditor General

Welsh Government Response to the Report of the Auditor General for Wales “Governance of National Park Authorities”

I am writing on behalf of the Welsh Government to thank you for your recent report “Governance of National Park Authorities”¹. I would also like to thank you and your team again for the engagement that has been undertaken throughout this work. We welcome the findings and offer the following response to the four recommendations contained within it. An abbreviated version of those responses is contained in the Organisational Response Form attached to this letter.

Recommendation 1 - Supporting members to carry out their role

This report highlights weaknesses in the ongoing support and guidance provided to members appointed by the Welsh Government. To address this, we recommend that NPAs and the Welsh Government work together to:

- *agree the support and guidance that will be provided to NPA members;*
- *agree which of this support and guidance will be provided by the Welsh Government and which will be the responsibility of NPAs; and*
- *clearly communicate this to Welsh Government appointed members.*

Accept– The Welsh Government accepts that there is a need for a clear understanding of the respective roles in providing support to members and will continue to work with NPAs and others on this. We acknowledge that a perception remains amongst some Welsh Government and Local Authority appointees alike that there is a difference in their roles, responsibilities and accountability.

¹ [Governance in National Park Authorities \(audit.wales\)](https://www.audit.wales)



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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Given the fact that we regard all NPA members as having equal status, we do not believe that we should provide additional guidance and support, above what the NPA itself provides, to our own appointees and not those appointed by Local Authorities. To do so would, we believe, exacerbate perceptions that we have two distinct sets of NPA members.

Notwithstanding this, we have and continue to acknowledge that the Welsh Government may have a role in providing additional support to all members, in agreement with National Park Authorities. This primarily lies in areas of national interest. For example, we have facilitated a training programme in January and February 2024 for all members in three key areas – Nature Recovery, Equality, Inclusion & Diversity, and Governance Excellence. This has supplemented the existing training provided by NPAs for all of its members. We will work with the NPAs to identify training needs going forward.

There is an ongoing programme of work, commenced in 2023, to embed governance excellence within NPAs. Alongside the delivery of the training session on Governance Excellence for NPA members, we are developing a handbook on governance excellence, to be accompanied by three further focussed training sessions covering Sustainable and Ethical Governance, effective Financial Governance, and Governance of Risk. This will be finalised and adopted by NPAs in 2024-25.

Welsh Government's National Parks policy team will in 2024-25 set out its planned support, including training, for NPA members, and ensure these are reflected in key paperwork such as Terms of Appointment for NPA members, where appointed by the Welsh Ministers, as well as future Term of Government letters from Welsh Ministers to NPA Chairs. This support will be discussed and shared with the NPAs.

Recommendation 2 *Ensuring member nominations support good governance.*

This report highlights a lack of clarity and inconsistency in how local authority members are nominated to sit on NPAs. It also highlights a lack of diversity amongst local authority NPA members. To help address this, we recommend that NPAs work with the WLGA and the Welsh Government to:

- *review whether the protocol for nominations remains fit for purpose;*
- *raise awareness of the protocol and how it can support nominations; and*
- *promote its usage amongst relevant local authorities.*

Accept. Welsh Government, WLGA and NPAs will review the protocol one year in advance of the next Local Government elections, which will take place in 2027. We fully acknowledge issues around how local authority members are selected for membership on NPAs. We also recognise the lack of diversity amongst those members.

The protocol was last reviewed at the time of the previous Local Authority elections. Working with WLGA and the NPAs, we comprehensively updated the protocol with a view to making the role of NPA member more attractive to Local Authority members, and for group leaders within county councils to consider a wider range of issues and priorities in determining nominations to NPAs. Alongside this, we worked with NPAs to produce two short videos of NPA members talking about their experiences and the benefits from serving on NPAs. We also worked with NPAs and local authorities through their respective Democratic Services Officers, as well as the WLGA, to promote the new protocol.

The protocol is not a statutory document and despite the review and promotion we undertook on this occasion, we were not aware of any direct impact on how Local Authorities selected NPA members following its introduction. We believe that the legislative framework for NPAs, as well as the diversity profile of Local Authority members, are the primary constraining factors in this regard.

Recommendation 3 – Improving accountability for members.

To provide assurance on members' contribution to the governance of NPAs, and to help inform future training and development provision, we recommend that the Welsh Government, NPAs and constituent local authorities work together to develop an accountability framework for all members of NPAs that:

- evaluates their contribution to the NPA; and*
- can be used to help to target support and development to enable NPA members to be effective in their role.*

Accept in part. In 2022, the Welsh Government reviewed and improved the accountability and performance system in place for its own appointees. This included a requirement for an annual appraisal for all Welsh Minister-appointed members. This is intended not only to identify performance issues, but also to allow individual Members to identify training and development and other support requirements. We encourage, but cannot mandate, the NPAs to adopt the same appraisal for Local Authority nominees.

The Welsh Government believes it is primarily for the NPAs themselves to respond to the needs and issues highlighted in any performance system as part of their own comprehensive member support service. Welsh Minister-appointed members are regularly appraised by NPA Chairs and that information is shared with officials. In the interests of consistency and best practice, we encouraged NPAs to adopt the same appraisal system for Local Authority appointees. This would allow performance issues to be identified with parent Local Authorities and for a consistent approach to be applied to all members. This has, we understand, only been partially successful.

The Governance Excellence handbook referred to in the response to Recommendation 1 will be followed by a performance protocol for NPA members, which will be aimed at improving the effectiveness and consistency of contributions by Members and to enable the monitoring of performance and behaviours. This will build on the performance appraisal system referred to above, with the aim of ensuring a more consistent system is in place for all members. This is planned for publication in 2024-25.

The Welsh Government's view is that, once appointed to an NPA, the role of members is essentially the same - whether appointed by Welsh Government or by Local Authorities. Once they become a member, each individual is accountable to and represents the Park Authority itself, as an equal member. This is conveyed to members through their Terms and Conditions of Appointment. We believe that the responsibility for leading on development of an accountability framework for all of its members should therefore lie primarily with the NPAs themselves; with support from Welsh Government and the WLGA/Local Authorities.

Recommendation 4 - Reviewing whether the model is delivering what was intended.

This report highlights weaknesses in the implementation of the governance model and how these issues raise questions about its suitability. To ensure it remains fit for purpose and reflects the distinct and different challenges each faces we recommend that, within the timescales of designating a new national park, the Welsh Government reviews the governance model for NPAs.

Accept in part. Over the past two years we have taken several steps, with the NPAs themselves, to improve accountability, understanding and support for all NPA members.

Nevertheless, as your report notes, some weaknesses remain more difficult to resolve within the current framework.

In terms of the proposed new National Park, we remain in dialogue about this with Natural Resources Wales, the designating authority.

Significant changes to the governance model of NPAs themselves would require primary legislation and a level of consensus with Local Government. It would not be appropriate or practical to make legislative changes to the NPA governance model concurrently with the designation process currently under way. We consider it more appropriate that significant changes such as these take place once this process has been concluded, prior to the establishment of a new body. Consideration of governance best practice will form part of the establishment of any resulting new body following the current designation process.

I hope that you find this response helpful and look forward to continuing to work with you and your teams.

Copies of this letter have been sent to the Chair of the Senedd Public Affairs and Public Administration Committee.



Tracey Burke
Director General
Local Government, Housing & Climate Change and Rural Affairs

Organisational response

Report title: Governance of National Park Authorities

Completion date: May 2024

Ref	Recommendation	Organisational response Please set out here relevant commentary on the planned actions in response to the recommendations	Completion date Please set out by when the planned actions will be complete	Responsible officer (title)
R1	<p>This report highlights weaknesses in the ongoing support and guidance provided to members appointed by the Welsh Government. To address this, we recommend that NPAs and the Welsh Government work together to:</p> <ul style="list-style-type: none"> • agree the support and guidance that will be provided to NPA members; • agree which of this support and guidance will be provided by the Welsh Government and which will be the responsibility of NPAs; and • clearly communicate this to Welsh Government appointed members. 	<p>Accept– The Welsh Government accepts that there is a need for a clear understanding of the respective roles in providing support to members and will continue to work with NPAs and others on this. We acknowledge that a perception remains amongst some Welsh Government and Local Authority appointees alike that there is a difference in their roles, responsibilities and accountability.</p> <p>.</p> <p>Welsh Government’s National Parks policy team will in 2024-25 set out its planned support, including training, for NPA members, and ensure these are reflected in key paperwork such as Terms of Appointment for NPA members, where appointed by the Welsh Ministers, as well as future Term of Government letters from Welsh Ministers to NPA Chairs. This support will be discussed and shared with the NPAs.</p>	March 2025	Simon Pickering
R2	<p>This report highlights a lack of clarity and inconsistency in how local authority members are nominated to sit on NPAs. It also highlights a lack of diversity amongst local authority NPA members. To help address this, we recommend that NPAs work</p>	<p>Accept - Welsh Government, WLGA and NPAs will review the protocol one year in advance of the next Local Government elections, which will take place in 2027.</p> <p>We fully acknowledge issues around how local authority members are selected for membership on NPAs. We also recognise the lack of diversity amongst those members.</p>	May 2027	Simon Pickering

	<p>with the WLGA and the Welsh Government to:</p> <ul style="list-style-type: none"> • review whether the protocol for nominations remains fit for purpose; • raise awareness of the protocol and how it can support nominations; and • promote its usage amongst relevant local authorities 	<p>The protocol was last reviewed at the time of the previous Local Authority elections where we also worked with WLGA and the NPAs to promote its usage.</p>		
<p>R3</p>	<p>To provide assurance on members' contribution to the governance of NPAs, and to help inform future training and development provision, we recommend that the Welsh Government, NPAs and constituent local authorities work together to develop an accountability framework for all members of NPAs that:</p> <ul style="list-style-type: none"> • evaluates their contribution to the NPA; and • can be used to help to target support and development to enable NPA members to be effective in their role. 	<p>Accept in part. In 2022, Welsh Government reviewed and improved the accountability and performance system in place for its own appointees. This included a requirement for an annual appraisal for all Welsh Minister-appointed members. This is intended not only to identify performance issues, but also to allow individual Members to identify training and development and other support requirements. We encourage, but cannot mandate, the NPAs to adopt the same appraisal for Local Authority nominees.</p> <p>We are also developing a Governance Excellence handbook and a protocol for all members, which will include a section on performance. This will be aimed at improving the effectiveness and consistency of contributions by Members and to enable the monitoring of performance and behaviours. This is planned for publication in 2024-25.</p> <p>Welsh Government's view is that, once appointed to an NPA, the role of members is essentially the same - whether appointed by Welsh Government or by Local Authorities. Once they become a member, each individual is accountable to and represents the Park Authority itself, as an equal member. This is conveyed to members through their Terms & Conditions of Appointment. We believe that the responsibility for leading on development of an accountability framework for all of its members should therefore lie primarily with</p>	<p>March 2025</p>	<p>Simon Pickering</p>

		the NPAs themselves; with support from Welsh Government and the WLGA/Local Authorities.		
R4	<p>This report highlights weaknesses in the implementation of the governance model and how these issues raise questions about its suitability. To ensure it remains fit for purpose and reflects the distinct and different challenges each faces we recommend that, within the timescales of designating a new national park, the Welsh Government reviews the governance model for NPAs.</p>	<p>Accept in part. Over the past two years we have taken several steps, with the NPAs themselves, to improve accountability, understanding and support for all NPA members.</p> <p>Significant changes to the governance model of NPAs themselves would require primary legislation and a level of consensus with local government. It would not be appropriate or practical to make legislative changes to the NPA governance model concurrently with the designation process currently under way.</p> <p>We consider it more appropriate that significant changes such as these take place once this process has been concluded, prior to the establishment of a new body. Consideration of governance best practice will form part of the establishment of any resulting new body following the current designation process.</p>	March 2026	Simon Pickering