

LOCAL GOVERNMENT
CHANGE COMMISSION

Electoral Arrangements Review

FEBRUARY 2023

IPSWICH CITY COUNCIL

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BACKGROUND

The Local Government Change Commission (Change Commission) is an independent body established under the *Local Government Act 2009* and is responsible for assessing whether a proposed 'local government change' is in the public interest. A local government change can include a change to the boundaries, divisions, number of councillors, name or classification of a local government area.

The Change Commission may only assess local government changes proposed by the Minister responsible for Local Government, with the exception of matters relating to the Brisbane City Council.

The Change Commission performs its functions independently and is administratively supported through the Electoral Commission of Queensland.

IPSWICH ELECTORAL ARRANGEMENTS

On 9 July 2019, the Change Commission published an electoral arrangement and divisional boundary review report recommending the Ipswich City Council change its electoral arrangements from ten single member divisions into four multi-member divisions with two councillors representing each division. The Change Commission also recommended that:

“Given the unique situation in Ipswich and the significance of the changes being recommended by this review, the Change Commission recommends the Minister consider directing the Ipswich City Council, in consultation with the Change Commission, to conduct a mid-term review and community consultation in 2022 to gauge residents’ experiences and satisfaction with the multi-member arrangement and divisional boundaries.”¹

In 2020, Ipswich became a multi-member, divided council consisting of four divisions, represented by eight councillors plus the mayor.

MINISTERIAL REFERRAL

On 7 July 2022, the Deputy Premier and Minister for State Development, Infrastructure, Local Government and Planning and the Minister Assisting the Premier on Olympic Infrastructure, the Honourable Steven Miles MP, (the Deputy Premier) referred the conduct of a mid-term review to the Change Commission (refer to **Appendix 1**). The Change Commission commenced the review in August 2022 and advised the Deputy Premier that a report would be provided in early 2023.

The Change Commission for this review was constituted by Pat Vidgen PSM, Electoral Commissioner; Wade Lewis GAICD, Casual Commissioner; Jennifer Lang, Casual Commissioner; and Peter McGraw, Casual Commissioner.

¹ 2019 Local Government Change Commission Ipswich City Council Final Determination Report, p.10

LOCAL GOVERNMENT PROFILE

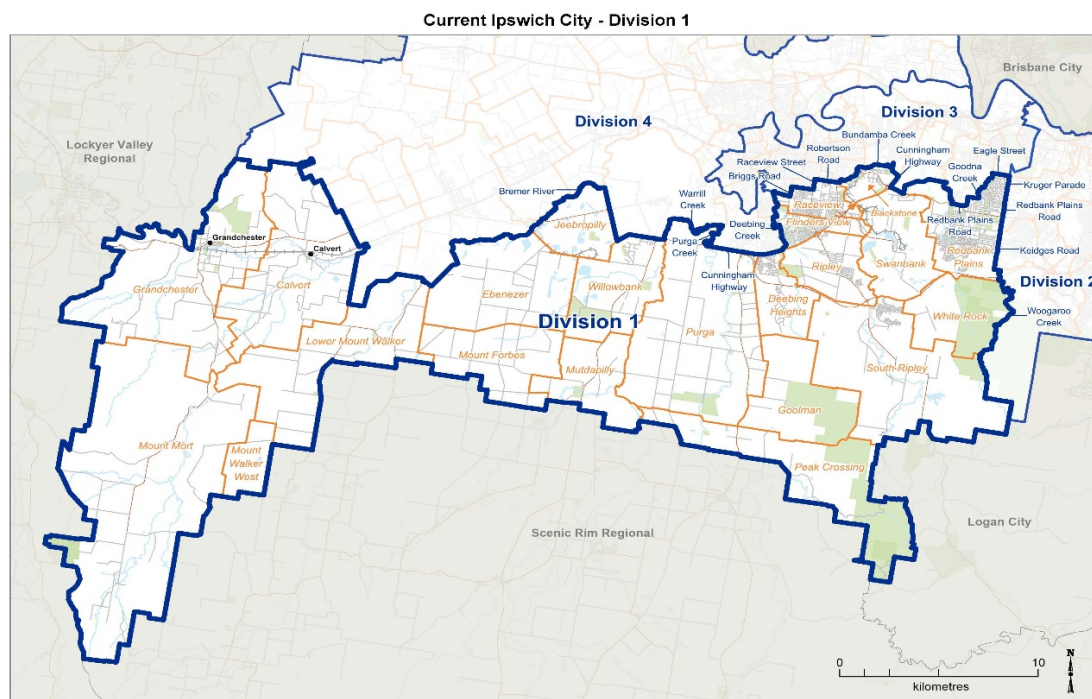
The Ipswich City Council is 35.6 kilometres south-west of Brisbane in Queensland's south-east, with substantial rural, rural-residential, urban, commercial and industrial areas. The main urban centre is Ipswich, with developing residential areas in the east, and numerous small townships including Grandchester, Marburg, Rosewood and Walloon. A map of the Ipswich City Council is located at **Appendix 2**.

The resident population of the Ipswich City Council at the 2021 Census was 229,208 with a land area of 1,093.9 km² and population density of 213.3 persons per km².² As at December 2022, there were 148,456 electors enrolled to vote in the Ipswich City Council area.

DIVISIONAL PROFILES

Division 1

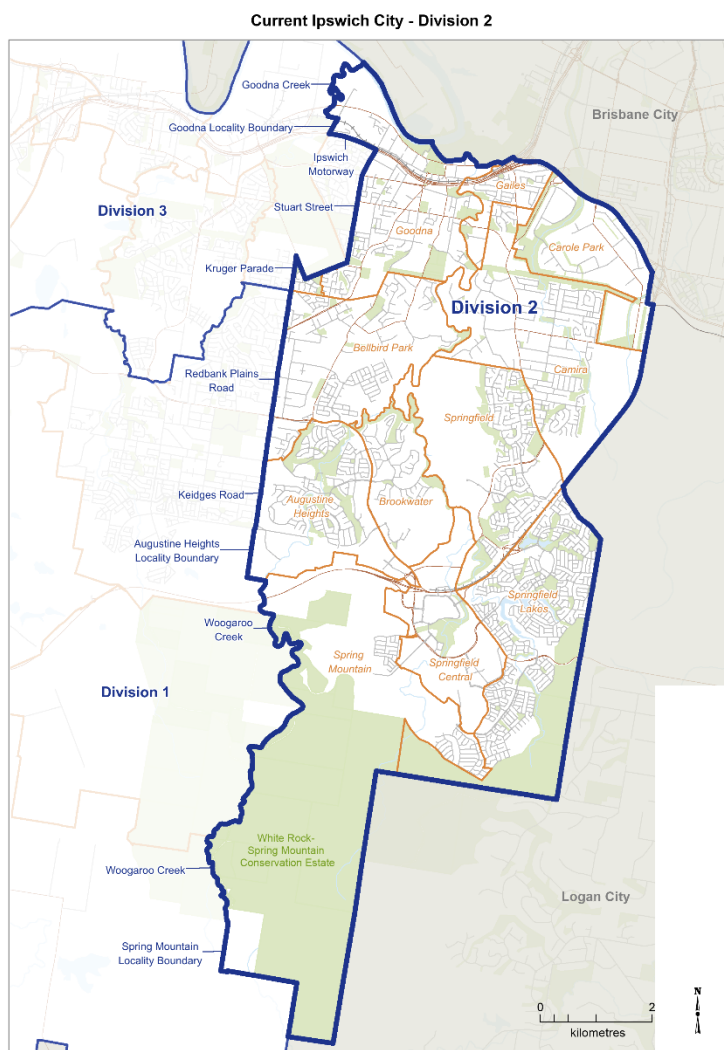
- Division 1 is the largest division and includes rural and urban suburbs, with an area of 611 km².
- The division has a population of approximately 64,000 and 34,000 enrolled electors.
- The division includes the suburbs of Grandchester, Mount Mort, Mount Walker West, Lower Mount Walker, Calvert, Ebenezer, Mount Forbes, Jeebropilly, Willowbank, Mutdapilly, Purga, Peak Crossing, Goolman, Deebling Heights, Raceview, Flinders View, Ripley, South Ripley, White Rock, Swanbank, Blackstone and Redbank Plains.



² <https://www.abs.gov.au/statistics/people/population/regional-population>

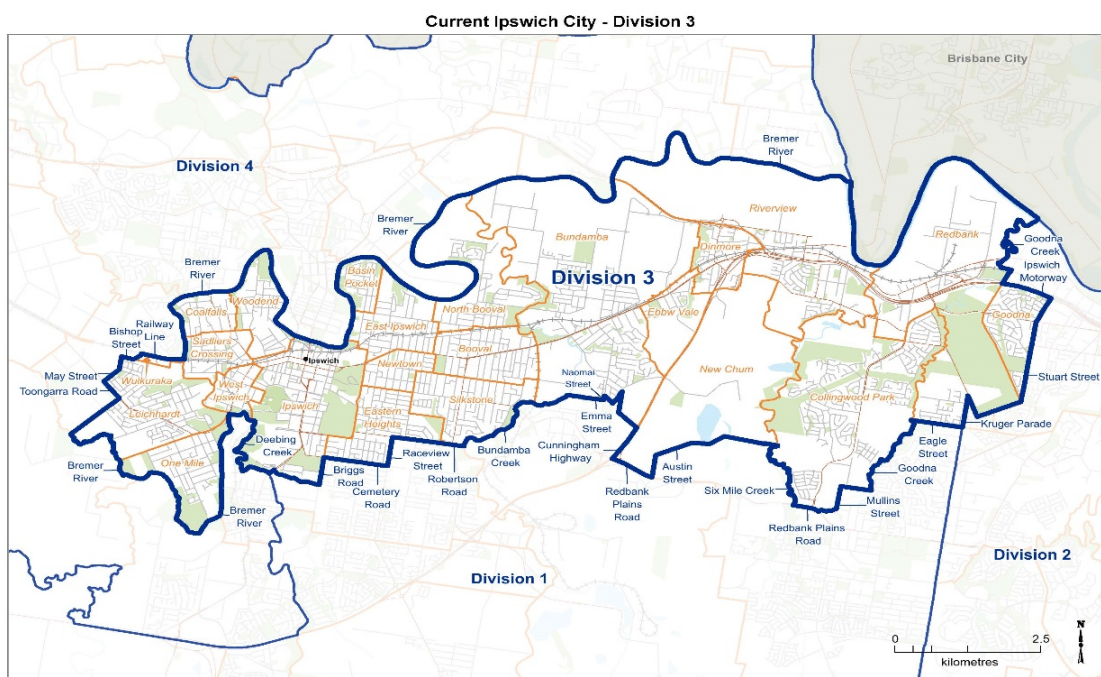
Division 2

- Division 2 is a mostly urban area covering 74 km² with a population of approximately 70,000 and 40,000 enrolled electors.
- The division includes the suburbs of Spring Mountain, Springfield Lakes, Springfield Central, Springfield, Brookwater, Augustine Heights, Bellbird Park, Camira, Carole Park, Gailes and some of Goodna and Redbank.



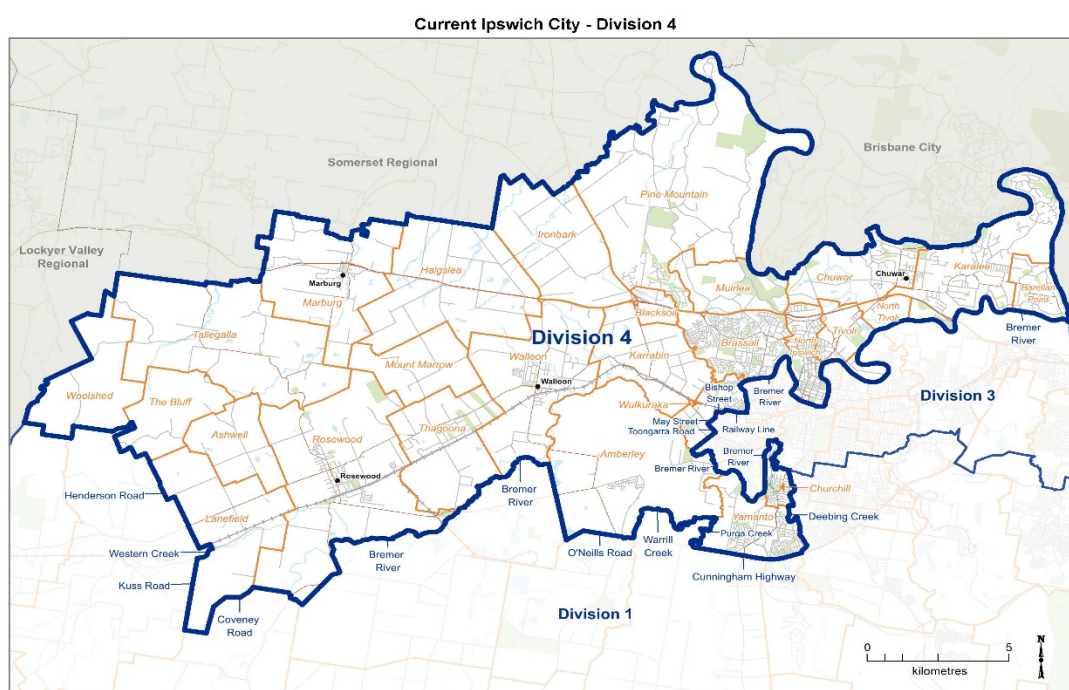
Division 3

- Division 3 contains most of the central Ipswich suburbs and the CBD, with an area of 68 km².
- The division has a population of approximately 59,000 and 39,000 enrolled electors.
- The division includes the suburbs of One Mile, Leichhardt, Coalfalls, Sadliers Crossing, West Ipswich, Woodend, Ipswich, Basin Pocket, East Ipswich, Newtown, Eastern Heights, Silkstone, Booval, North Booval, Bundamba, Ebbw Vale, New Chum, Dinmore, Riverview, Collingwood Park, most of Redbank, parts of Goodna and parts of Wulkuraka.



Division 4

- Division 4 consists of mostly rural and urban suburbs, covering 342 km².
- The division has a population of approximately 49,000 and 34,000 enrolled electors.
- The division includes the suburbs of Woolshed, The Bluff, Ashwell, Lanefield, Rosewood, Tallegalla, Marburg, Mount Marrow, Thagoona, Walloon, Haigslea, Ironbark, Pine Mountain, Blacksoil, Karrabin, Amberley, Yamanto, Churchill, Brassall, Muirlea, North Ipswich, Tivoli, Moores Pocket, North Tivoli, Chuwar, Karalee, Barellan Point and most of Wulkuraka.



INTRODUCTION OF MULTI-MEMBER DIVISIONS

In October 2016, the Crime and Corruption Commission commenced an investigation into allegations of corrupt conduct involving elected officials and senior executive employees of the Ipswich City Council. The investigation identified significant governance failures in the Ipswich City Council as summarised in the report titled 'Culture and corruption risks in local government: Lessons learned from an investigation into Ipswich City Council (Operation Windage)'.

Following the investigation, the mayor and councillors were dismissed, and an Interim Administrator put in place until the March 2020 local government elections.

On 30 April 2019, the Ipswich City Council Interim Administrator, Mr Greg Chemello, provided the then Minister for Local Government, Minister for Racing and Minister for Multicultural Affairs, the Honourable Stirling Hinchliffe MP with a report on divisional representation, which recommended the introduction of a multi-member divided council model. At that stage, the Ipswich City Council was divided into ten single-member divisions plus the Mayor.

The report identified that previous governance deficiencies were in part due to councillors placing too much emphasis on their own division and operational concerns and not enough attention on city-wide priorities and strategic issues.

This approach was assessed as being in contradiction to the role of councillors legislated in the *Local Government Act 2009*, which requires them to serve the overall public interest of the whole local government area and instead fostered a 'tale of 10 small cities' approach to leadership. Examples of this situation included providing each divisional councillor their own budget allocation for capital projects and community donations. This potentially encouraged a 'pet and populist' approach with divisional needs as perceived by the councillor often prioritised over wider community needs.³

To address structural issues that contributed to this situation, the Ipswich City Council Interim Administrator proposed three models for consideration through community consultation:

- Option 1: Undivided (8-12 councillors)
- Option 2: Divided – one councillor per division (8-12 councillors)
- Option 3: Divided – two to three councillors per division (4-6 divisions).

The Interim Administrator conducted a community survey, supported by a discussion paper, background document and comprehensive Q&A material that outlined the potential advantages and disadvantages of the three models proposed.

Responses were received from 1049 people and 450 written comments were reviewed, leading to a recommendation that Option 3 be implemented. Almost 90 per cent of respondents ranked Option 3 as either their first or second preference.

The report stated that multi-councillor divisions would effectively deliver the local representation the community was seeking and avoid a return to previous governance issues. The report also noted that Option 3 was the 'least polarising option for the city'.⁴

³ City of Ipswich Divisional Boundary Review Report 30 April 2019, p.10

⁴ City of Ipswich Divisional Boundary Review Report 30 April 2019, p.3

On 7 May 2019, the Minister for Local Government referred an electoral arrangement and divisional boundary review of the Ipswich City Council to the Change Commission to assess the proposed change to a multi-councillor model.

On 9 July 2019, the Change Commission published its report on the review of the Ipswich City Council's electoral arrangements, recommending the Ipswich City Council be divided into four multi-member divisions with two councillors representing each division. This changed the total number of councillors from ten to eight.

While aimed at improving governance within the Ipswich City Council, the Change Commission also recommended multi-member divisions on the basis that it would improve rural representation. In its report, the Change Commission stated:

The Change Commission also noted that multi-member divisions provide greater scope to have more councillors representing rural areas within the Council area, offering the opportunity for more inclusive representation and engagement with the community. The Change Commission considers this relevant given its awareness that a key community concern in the region is a perceived lack of rural representation under the current arrangements.⁵

The Minister accepted the recommendations of the Change Commission and the current electoral arrangements and divisional boundaries of the Ipswich City Council have been in place since the 2020 local government elections.

SCOPE OF REVIEW

In accordance with the Change Commission's recommendation in its 2019 report, in July 2022 the Deputy Premier requested that a mid-term review of the Ipswich City Council's electoral arrangements be conducted, including seeking the views of the Ipswich community and input from the Council (refer **Appendix 3**). The request for a mid-term review was supported by the Council.

It should be noted that although the review was not a formal assessment of a 'proposed local government change', as defined under section 17(2) of the *Local Government Act 2009*, the Change Commission applied the same principles to conduct the review.

This included applying the regulatory framework established under the *Local Government Act 2009* and Local Government Regulation 2010, as well as the policy framework for the establishment and operation of the current system of local government in Queensland. In this respect, the Change Commission was guided by the policy considerations and recommendations of the Local Government Reform Commission, the independent body established to make recommendations about local government reform and amalgamations in 2007.

The Change Commission's review process included:

- requesting a detailed submission from the Ipswich City Council to outline its arguments for or against any proposed electoral change
- conducting community consultation through a call for written submissions, and
- analysing other information relevant to the review.

⁵ 2019 Local Government Change Commission Ipswich City Council Final Determination Report, p.3

The review commenced in August 2022 with Change Commissioners Pat Vidgen, Wade Lewis and Peter McGraw meeting with the Ipswich City Council Chief Executive Officer, Ms Sonia Cooper, and administration representatives on 31 August 2022. The Council provided the Change Commission with a submission on 13 October 2022. Written submissions from the community were also requested from 14 to 28 November 2022. All written submissions were published on the Electoral Commission Queensland (ECQ) website on 5 December 2022.

REGULATORY FRAMEWORK

A proposed local government change referred by the Deputy Premier must be assessed by the Change Commission to determine whether it is in the public interest⁶, in accordance with requirements of the *Local Government Act 2009*.

The Change Commission, in assessing a proposed change, must consider:

- whether the proposed change is consistent with the *Local Government Act 2009*
- the views of the Minister, and
- any other matters prescribed under a regulation⁷.

Of relevance to this review, the Change Commission also gave consideration to section 12 of the *Local Government Act 2009*, which outlines the responsibilities of councillors, to determine any benefit or detriment arising from the existing arrangements for councillors in carrying out these responsibilities.

In discharging its responsibilities under the *Local Government Act 2009*, the Change Commission must also perform its functions in accordance with the 'local government principles' which include using transparent and effective processes and making decisions that are in the public interest⁸.

Additionally, the Change Commission gave consideration to requirements of section 58 and section 13 of the *Human Rights Act 2019* in conducting the review and concluded that its recommendation is compatible with human rights.

LOCAL GOVERNMENT REFORM COMMISSION

On 29 July 2007, the Local Government Reform Commission provided a report to the then Minister responsible for Local Government on its examination of local government area boundaries, classes, names and electoral arrangements as required by section 159C of the *Local Government Act 1993* (which was in force at the time).

Many of the local governments formed as a result of the recommendations of this report still exist and its findings form the foundation for the existing system of local government in Queensland. The Change Commission considered the report informative to the conduct of this review.

Ultimately, this report recommended minimal changes to the Ipswich City Council in the reform process.

⁶ *Local Government Act 2009*, s.19(1)

⁷ *Local Government Act 2009*, s.19(2)

⁸ *Local Government Act 2009*, s.4

However, the Change Commission found compelling information in the body of the report that applies to this review. In its analysis of local governments in Queensland, the Local Government Reform Commission rejected the notion of a 'one size fits all' approach to local government electoral arrangements. Instead, it gave regard to the individual nature of Queensland's different regions and their economic prospects.⁹

In considering issues of council composition and electoral arrangements, the Local Government Reform Commission pointed to the need for councillors to take a more strategic view of their roles, rather than responding to individual problems. Additionally, the number of councillors was considered to be less important than the process of consultation and community participation in ensuring adequate community representation.

Importantly, the Local Government Reform Commission did give some guidance in relation to the number of councillors, noting that councils with fewer than 200,000 people or 100,000 electors could have 10 councillors plus the mayor. However, it also noted the need to assess each council on a case-by-case basis and exercise discretion on the individual needs of the local government area.

The Local Government Reform Commission also supported the broad adoption of undivided local governments as the default model, with divided councils to be implemented by exception. This was based on a similar rationale to the introduction of multi-member divisions in Ipswich, aimed at councillors having a whole-of-area focus and removal of the need for councillors to advocate only for the geographical area they represent.

A copy of relevant extracts from the report are at **Appendix 4**.

ASSESSMENT

In undertaking the review, the Change Commission paid particular attention to the case advanced by the Ipswich City Council to ensure the issues and arguments raised as well as the outcomes of community consultation were adequately considered in a balanced manner.

The Change Commission also used additional information from other sources to supplement, confirm or refute information provided during consultation.

The Change Commission was mindful of the administrative and financial implications for the council and the community of implementing a change as compared to maintaining the current arrangements. These implications formed part of the process of balancing the overall public interest in considering whether a change should be recommended.

OUTCOMES OF CONSULTATION

To inform the community consultation process, the Change Commission sought a submission from the Council to provide its views on the current multi-member arrangements. This submission was published prior to the commencement of community consultation which was conducted from 14 November 2022 to 28 November 2022.

⁹ Report of the Local Government Reform Commission Volume 1, pp.5-6

Submissions could be made by any person, by post, email or online form. This allowed any interested party, including residents and stakeholders, to provide their views for the Change Commission's consideration.

All submissions were published on the ECQ website following the conclusion of the consultation period where appropriate, in accordance with publication guidelines for the review.

A copy of the published submissions is at **Appendix 5** and the publication guidelines are at **Appendix 6**.

Council submission

On 13 October 2022, Ipswich Mayor Teresa Harding lodged a submission to the Change Commission detailing recommendations for changes to the current electoral arrangements. The Ipswich City Council submission is at **Appendix 7**.

The Council put forward a number of arguments about why the existing electoral arrangements are not suitable:

- electoral arrangements should reflect the changing needs of the community
- Ipswich has recorded a strong annual growth rate of approximately 4 per cent over five years
- the City's forecast growth rate is 4.5 per cent per annum over the next 15 years
- current growth and higher councillor representation to resident ratios puts residents' access to representation at risk when compared to similar local government areas
- Ipswich is the only council in Queensland with multi-member divisions, and
- in 2020, the level of representation for Ipswich went from eleven to nine elected representatives in a council that has now grown to over 242,000 and is expected to reach 558,000 by 2041.

The Council proposed two potential models:

- Option 1: an increase from the existing four dual member divisions to five dual member divisions (one Mayor and 10 councillors across five dual member divisions)
- Option 2: change from the existing four dual member divisions to 10 single member divisions (one Mayor and 10 councillors across 10 single member divisions).

The Council submission stated that, under the existing arrangements, the rights of each resident to equal representation are being challenged by the combination of distance, diversity, competing priorities, representation ratios and duplication of workloads.

In its submission, the Ipswich City Council provided a number of key facts and figures to support their proposal to change electoral arrangements, including:

- Ipswich City Council is the fastest growing local government area in Queensland and is represented by the lowest number of elected representatives when compared to other local governments of similar size
- on average there are over 30,000 residents per councillor, which is expected to increase to 40,000 by 2026
- current divisional arrangements do not support the most effective achievement of the local government principles
- having dual member divisions with fewer councillors has not presented the anticipated efficiency gains

- more Council representation is required, particularly in managing the work of divisions with a larger geographical size, and
- the current divisions are large and incorporate many rural communities and the geographical size of the divisions makes it hard for councillors to maintain connections with the communities.

The submission also provided information on the budgetary impact for an additional two councillors.¹⁰ The Council estimated that the financial impact of the change would be approximately \$313,000, including remuneration, superannuation contribution and vehicle allowance for two additional councillors.

Written submissions

A total of 21 written submissions were received during the two-week submission period for the Change Commission's review, which is a significantly lower level of community participation compared to the consultation process undertaken by the then Interim Administrator in 2019. The majority of submissions supported a change to the electoral arrangements, while two submissions opposed a change, and three submissions did not express a definitive position.

The predominant views of submissions that supported a change to the current arrangements include:

- councillors are not visible in their communities¹¹
- current divisions have different needs – some are made up of rural and urban areas and the urban areas lose out¹²
- current divisions are not suitable; they are too big and should be changed¹³
- *“One of the flaws to this new process is that the geographical size of Divisions may not have been considered”*¹⁴
- current arrangements give too much power to administrators and do not represent rate payers effectively¹⁵
- a desire for councillors to return to local community offices that previously existed¹⁶, and
- *“... the Change Commission should consider the unique social and environmental characteristics and corresponding demographics of Ipswich rural communities and accordingly incorporate these communities into individual Ipswich identified rural divisions.”*¹⁷

The Federal Member for Blair, Mr Shayne Neumann MP, lodged a submission also supporting a change. In his submission he stated that *“with only eight councillors...there is asymmetric representation between Ipswich and more sparsely occupied regional councils”* and *“the fewer the number of councillors...the poorer the representation”*¹⁸

¹⁰ Ipswich City Council submission, p.12

¹¹ Submission no.18

¹² Submission no.9 and Submission no.13

¹³ Submission no.6

¹⁴ Submission no.18

¹⁵ Submission no.1

¹⁶ Submission no. 1 and Submission no.7

¹⁷ Submission no.16

¹⁸ Submission no.19

Two submissions were received opposing any change and provided the following reasons:

- given the divisions are based on a reasonable proportion of voters *“tinkering with present arrangements are not anticipated to result in meaningful improvements”*.¹⁹
- the Ipswich City Council is overestimating projected population growth...as data obtained shows a decrease *“from 4.7% in 2009 to 2.7% in 2021, well below the figure used by Council”*²⁰

Further investigation of data contained in the Ipswich City Council submission confirmed that the current population growth for Ipswich is estimated at 2.7 per cent by the Australian Bureau of Statistics. Another refutes a claim made by the Council that lower councillor representation to resident ratios would increase ability for residents to access representation²¹ by noting that Ipswich already has the lowest number of people per councillor in a list of local government areas with a substantial urban population.

Issues for consideration

The Change Commission has reviewed the submissions from the Ipswich City Council and the public as important inputs to its assessment of the efficacy of the current arrangements. The Change Commission notes that a key concern expressed by both the Council and some submitters is the ability for councillors to meet with and hear the views of their constituents. Views expressed through submissions included that councillors are no longer in a position to interact with the public and respond to the issues impacting on their lives. This is especially the case for those living in the rural parts of Ipswich.

The Change Commission, however, is not convinced that this perceived lack of representation is caused entirely or in part by the existing electoral arrangements. No submission appeared to demonstrate that alternatives had been considered or implemented, for example through the reopening of local councillor offices, to improve the quality of engagement with the public nor that the existing arrangements in and of themselves were impeding engagement. This aligns with the Local Government Reform Commission report that emphasised the need for effective consultation processes and community participation.

The Change Commission considered the small number of submissions received to its review and noted that the low level of community participation does not provide clear and direct evidence of the prevailing views of the community about the operation of the current electoral arrangements. This indicated a lack of demonstrable evidence that the existing arrangements are causing widespread detriment across the Ipswich community.

COMPARATIVE ANALYSIS

The Change Commission considered the arguments advanced by the Council regarding the representation levels for the Ipswich community and examined a number of data sources to review the context in which the Ipswich City Council operates compared to other local governments in Queensland.

¹⁹ Submission no.12

²⁰ Submission no.8

²¹ Submission no.8, p.8

Representation

The Change Commission undertook an analysis to compare the Ipswich City Council to other similar councils to determine if this was a reasonable approach when determining appropriate electoral arrangements. In its submission, the Ipswich City Council also provided a table listing comparative data for a range of Queensland councils of similar size, both divided and undivided.²² However, the Change Commission also collated and analysed additional data relating to various councils as outlined in Tables 1 and 2 below. Ultimately this data proved inconclusive for the Change Commission's assessment.

While the Ipswich City Council has the fewest councillors of the major south-east Queensland councils, it is below average when comparing the number of councillors to population or elector. The Council has the second lowest ratio of population to councillor and third lowest ratio of elector to councillor of the seven major south-east Queensland councils.

In its submission to the Change Commission, the Ipswich City Council argued that Redland City Council has a similar elector population but a higher average ratio of electors to councillors when compared to other Queensland councils.

As detailed in Table 1 below, the ratio of electors to councillors in south-east Queensland councils generally ranges from approximately 18,000 to 32,000 electors per councillor with an average of approximately 23,400 electors per councillor. The Ipswich City Council has a ratio of 18,557 electors per councillor, which is better than the average. When compared to other south-east Queensland councils, the Redland City Council has a ratio of 11,656 electors per councillor, which is the lowest of the group.

In terms of the size of the local government area per councillor, at approximately 134 km² per councillor, Ipswich is the third highest. However, it is significantly lower compared to Moreton Bay (170 km² per councillor) and Sunshine Coast (226 km² per councillor).

The Change Commission also compared Ipswich to councils outside south-east Queensland, namely those also in categories 5 to 8 as defined by the Local Government Remuneration Commission (Table 2). These are useful comparisons as the Local Government Remuneration Commission must determine its categories with regard to size, geographic and environmental terrain as well as the population, demographics, spread and extent of the services provided. Therefore, this gives the Change Commission confidence that comparisons are made against broadly similar councils, noting some are higher and lower categories to Ipswich.

In examining the local governments outside south-east Queensland, all had lower ratios of electors to councillors. However, all had a significantly larger geographic area for each councillor to traverse. Toowoomba for example had almost 1300 km² per councillor.

²² Ipswich City Council Submission, Appendix A

	Councillors (excluding mayors)	Population (2021 Census)	Electors (Dec 2022)	Size (km ²)	Population per councillor	Electors per councillor	km ² / councillor
Brisbane City Council	26	1,242,825	834,895	1337	47,800.96	32,111.35	51.42
Gold Coast City Council	14	625,087	424,831	1315	44,649.07	30,345.07	93.93
Ipswich City Council	8	229,208	148,456	1094	28,651.00	18,557.00	136.75
Logan City Council	12	345,098	216,376	958	28,758.17	18,031.33	79.83
Moreton Bay Regional Council	12	476,340	333,197	2038	39,695.00	27,766.42	169.83
Redland City Council	10	159,222	116,565	538	15,922.20	11,656.50	53.80
Sunshine Coast Regional Council	10	342,541	252,986	2264	34,254.10	25,298.60	226.40
Average					34,247.21	23,395.18	109.40

Table 1. Comparative local government area population and enrolment data – south-east Queensland councils

	Councillors (excluding mayors)	Population (2021 Census)	Electors (Dec 2022)	Size (km ²)	Population per councillor	Electors per councillor	km ² / councillor
Cairns	9	166,943	113,593	1,693.2	18,549.22	12,621.44	188.13
Mackay	10	121,691	86,081	7,593	12,169.10	8,608.10	759.30
Toowoomba	10	173,204	122,511	12,976	17,320.40	12,251.10	1,297.60
Townsville	10	192,768	136,781	3,727	19,276.80	13,678.10	372.70
Average					16,828.88	11,785.61	654.43

Table 2. Comparative LGA population and enrolment data – other councils

Electoral arrangements

Ipswich City Council is the only local government area in Queensland with multi-member divisions. The level of representation for the Ipswich City Council has changed from eleven (11) to nine (9) elected representatives in 2020 based on the recommendations from the 2019 Interim Administrator's report and the subsequent Change Commission report.

The Change Commission notes that the *Local Government Act 2009* does not provide criteria or guidance as to the recommended number of councillors based on population. It is therefore of the view that each council area must be considered unique and so too must its representation requirements.

However, this makes drawing a conclusion from comparisons with other local governments challenging. In relation to proposals for increased representation, as outlined in the Council's submission and in some public responses, the Change Commission notes that the diversity of councillors is ultimately determined by the candidates who nominate and are elected by the community. The Change Commission is therefore not convinced that having more councillors will result in more diverse or effective representation.

Informality rates

The Change Commission also analysed the rate of informal voting in Ipswich at the 2020 local government elections. While this issue was not raised by submitters, the Change Commission considered it prudent to undertake this analysis as the change from single to multi-member divisions resulted in a change to the voting system from optional preferential voting to first-past-the-post voting.

Councillor informality rates at the March 2020 Ipswich City Council election increased to 11.27 per cent from 4.20 per cent at the 2016 election. A review of informal ballot papers from Ipswich conducted in 2020²³, concluded that approximately 67.5 per cent of informal ballots were assumed to be cast intentionally. However, of the 32.5 per cent of informal ballots assumed to be cast unintentionally, approximately 96 per cent were due to voters only marking one box on the ballot paper, when they were required to mark two. Under optional preferential voting, these ballots would have been considered formal.

Therefore, it appears that many voters may have been unaware that the voting system had changed and cast what would have been a formal vote under the previous voting system. A further contributing factor may have been the conduct of the Bundamba State by-election on the same day, which resulted in many Ipswich electors having to vote for a State Member, Mayor and councillors on the same day, each using a different voting system.

The rate of informality may reflect a change in voters' understanding of the relevant voting system or be indicative of dissatisfaction with the council and/or candidates given the high rate of assumed intentional informality. It is likely, and there is precedent at the State-level, that over time voters become more familiar with voting systems, which will result in a decline in unintentional informal voting.

²³ [2020 local government elections: report on the elections](#)

Issues for consideration

The analysis of representation ratios between various councils in the south-east Queensland region suggests that the Ipswich City Council is not under-represented at a local government level in comparison to similar local governments. However, the Change Commission is not convinced that this is an appropriate metric by which the number of councillors should be determined, taking into account the diversity in scale and nature of local government across Queensland.

It should be noted there is no formal framework that outlines the preferred number of councillors for local governments nor their electoral arrangements. The Change Commission therefore considers such matters on a case-by-case basis for each referral while having regard to the broader context of the operation of local government in Queensland. Each local government electoral arrangement needs to be determined based on the specific circumstance and context.

The Change Commission has also been informed by the approach taken by the Local Government Reform Commission that each local government needs to be assessed according to its specific circumstances. Additionally, it was persuaded by the principles that councillors need to take a strategic view to their role and implement appropriate processes to consult and engage with their community.

CONCLUSIONS

The Change Commission has assessed various considerations associated with the electoral arrangements for the Ipswich City Council and is not persuaded that a sufficient case exists to recommend a change. In reaching its recommendation, the Change Commission gave consideration to all views and materials presented to it, in particular the submission provided by the Ipswich City Council.

There are three key reasons the Change Commission came to this conclusion.

Firstly, the limited degree of community participation in the review, as demonstrated by the small number of public submissions received by the Change Commission, did not support the argument to justify a change to electoral arrangements.

The current electoral arrangements arose from a period of change for the Ipswich City Council. It was the aim to address this, in part, through the implementation of new electoral arrangements, based on the extensive community consultation undertaken by the previous Interim Administrator.

In this instance, there has not been a similar level of demonstrated broad-based community support for change, compared to the participation in community consultation undertaken in 2019. Nor is there evidence from the public submissions received that the existing electoral arrangements are causing detriment to the governance and administration of the Council.

Secondly, the Change Commission was not persuaded by the arguments about a decline in representation put forward in some public submissions and the Ipswich City Council. While Ipswich has a relatively low number of councillors compared to the population among similar local governments, the Change Commission does not consider that the current ratio of electors to councillors presents a structural barrier to achieving effective representation for members of the Ipswich community.

The issues raised by the Ipswich City Council about access to councillors could potentially be addressed through administrative improvements or changes in approach to outreach and representation rather than through further changes to the Council's electoral arrangements. This includes application of the principles of the *Local Government Act 2009* that require all councillors, including those representing divided councils, to represent the interests of the whole local government area rather than solely the division for which they are elected.

Thirdly, the Change Commission considers that it is too soon after the 2020 local government elections to conclude that the current electoral arrangements are not meeting the needs of the community. On balance there is no strong evidence to suggest change is needed, and that if electors are dissatisfied with their level of representation, increasing the number of councillor positions or changing divisional arrangements are unlikely to resolve this.

The Change Commission also notes that the enrolment across the four divisions of the Ipswich City Council remain within the quota set under the *Local Government Act 2009*. This means that a review of the divisional boundaries would not be required prior to the 2024 elections, as was contemplated by the Change Commission in preparing its 2019 report recommending the mid-term review of the electoral arrangements.

In view of changes to local government arrangements and representation of the Ipswich community over recent years, this review provides an opportunity to maintain continuity and stability for Ipswich electors and the Council for a further term of local government. This may also result in improving the rate of informality as voters improve their understanding of the existing voting system.

It is the Change Commission's view that if this issue is examined again in the future, the Ipswich City Council should present a case for further change to the Council's electoral arrangements through proposing a 'local government change' according to the Department of State Development, Infrastructure, Local Government and Planning's guide for local government change proposals. It would then be a matter for the Deputy Premier to refer the matter to the Change Commission for assessment.

RECOMMENDATION

The Change Commission recommends that there be no change to the electoral arrangements of the Ipswich City Council.

The Change Commission has provided the report of its assessment to the Deputy Premier. In accordance with the *Local Government Act 2009*, the Change Commission has published the report on the ECQ website.



Pat Vidgen PSM
Electoral Commissioner



Wade Lewis GAICD
Casual Commissioner



Jennifer Lang
Casual Commissioner



Peter McGraw
Casual Commissioner

APPENDICES

- APPENDIX 1** Ministerial referral
- APPENDIX 2** Ipswich City Council map
- APPENDIX 3** Local Government Change Commission Ipswich City Council Final Determination Report, 2019
- APPENDIX 4** Local Government Reform Commission Report extracts
- APPENDIX 5** Public submissions
- APPENDIX 6** Publication guidelines
- APPENDIX 7** Ipswich City Council submission