

29 January 2018

Lisa Horsburgh
Project Manager, Consultation Charter Review
Regulatory Analyst, Local Government
Level 37, 2 Lonsdale Street Melbourne VIC 3000
lisa.horsburgh@esc.vic.gov.au

By email – communication@esc.vic.gov.au

Dear Lisa

Submission on draft charter of consultation and regulatory practice

Thank you for the opportunity to submit a submission on your draft charter of consultation and regulatory practice.

KJA is a leading consultancy offering strategic communications services for government and private organisations across Australia. Our specialist team includes more than 70 staff and associates with qualifications and expertise in stakeholder and community engagement, government and media relations and strategic communications. Our strategic engagement approach is risk-based and takes into account stakeholder and issues analysis.

Any organisation seeking to improve its engagement practices should be commended and overall, this Draft charter of consultation and regulatory practice represents good practice in external engagement. I have the following feedback on the draft charter:

1. Principles-based approach

- a. The principles are clear and concise. You could consider a commitment to being more proactive in your engagement in principle 5, to “actively involve” stakeholders. This principle could then be reflected in your engagement techniques detailed elsewhere.
- b. The suggested methods evaluation and monitoring are effective for transparency in reporting but could be coupled with a commitment to ongoing improvement based on the learnings and insights gathered. Some discussion of this process and the anticipated outcomes would help validate the approach.

2. Principles of engagement vs consultation

- a. It is not clear to the reader why this change to engagement practice has taken place. Consider adding a brief discussion about previous manner of engagement vs the new, to emphasize the benefits in the changes that are being made.
- b. The Consultation Paper discusses establishing an engagement framework (page 8). This is to be commended and could be further supported by inclusion in the Charter document.
- c. The Charter could be strengthened by discussion of measures of performance and providing certainty on the outcomes of consultation activities including reporting.

- d. The draft Charter, would also be enhanced through the inclusion of project and engagement activity examples including the citizen's juries. This is an opportunity to promote the excellent engagement practice of the ESC.

3. Approach to regulatory practice

- a. The choice of language throughout the document suggests aspiration or future focus through the use of 'we will'. Consider strengthening the position of the ESC by changing the language to a more active footing and using 'we are' or 'we do'. This would also emphasise the organisation's way of working differently and better.
- b. I suggest the use of summarising headlines throughout the document and other methods to make the content simple to digest.
- c. Where possible, it would be great to include an example of how this change will bring about better performance.

Once again, thank you for the opportunity to provide comment on this important piece of work. If you would like to discuss this further please don't hesitate to contact me on 02 9955 5040.

Yours sincerely



Kathy Jones
Executive Chair