

Making Effective Submissions

An information sheet compiled for The Wheelhouse by Louise Tester (PhD)

What is a submission?

Consultation is common and expected in today's society. Local Government, Crown Agencies, Charities, Businesses, in fact any organisation might ask their community, customers or stakeholders for ideas, views and feedback about their plans. When we make this feedback we often call it a submission. So when should we think about making a submission and how would we do it? Before this however, how do we even find out about consultations?

How do I find out about consultations?

It is not always easy to know what consultation is happening in the community, so where do we start? Groups such as local councils and government agencies often inform the community about draft plans, proposed legislations, new policies etc. via social media and the internet. A good place to start is to 'friend', 'follow' or 'bookmark' the groups and bodies that you are interested in. This way when they have a consultation open for feedback they will tell you, you do not need to go hunting.

That said, some bodies do not always make it easy and I think of a recent experience where a committee I am part of referenced a consultation that I was not aware of, during one of our meetings. So, I went on their website and looked for the feedback section. You might need to use the search function to find the consultation on the website. Try a range of words: feedback, consultation, have your say, submissions. In my particular case the consultation was not embedded in the 'feedback' part of the website. When this happens it is useful for search for the topic, subject or key word: long term plan, bylaw, policy etc. I eventually found my consultation using this strategy.

Once you have found the consultation you are interested in, let others know. Share the information with your networks. If you could not find it easily, perhaps others struggled too.

When should I give feedback?

As people who are interested in many aspects of society and community, we could spend our lives providing feedback and information on consultations, so use your knowledge, time and skills well. Before thinking about making a submission ask yourself the following:

- Why does this issue matter my organisation or me?
- Why is it important that we give feedback?
- What are the risks of not making a submission?
- What is our position, view, standpoint? Are we going to complain, be critical and moan, or do we have insights and constructive comment that can inform and improve the decision-making process? Are we offering our support of the proposal?
- Who is the audience? What level of knowledge and understanding do they have? Where do I 'pitch' the information?
- Who is the submission on behalf of is it an organisational perspective or a personal view?

The last question above is worthy of a little more discussion.

Who should make the submission?

When we are giving feedback as a group or organisation, it is important that the group's committee or governance board first approve that a submission is made on behalf of the organisation. Once the group has agreed this in principle, collectively you will need to decide the position that you will take on the issue or document. It is possible and probable that individual members will have different views. This is OK but remember the submission that is presented on behalf of the group needs to be supported by the group. If, in these early stages the group cannot agree on a collective view, this is the time to stop. Now, you may want to think about making a personal submission. When this happens, you will still need to think about your role on the committee or board you sit on. Will your personal view be in conflict with any part of the organisation's values, principles or priorities? You do not want to embarrass your colleagues or undermine the good work of your organisation.

Let's assume the group has decided that a submission will be made and that you all agree on the position you will take, now you can draft your submission.

What makes a good written submission?

The organisation you are submitting to will set out their expectations, closing dates, format to present etc. If you are not sure contact them and seek clarification.

The organisation that you are submitting to will have a large body of information to consider. You want your submission to be easy to read, easy to understand and stand out. A good submission is one that is honest, compelling, relevant and clear. Simple right. So how do we do this?

- Format and structure. It is preferable to present a typed submission. Use a clear font (Times New Roman, Arial or Calibri) at font 12 with 1.5 line spacing.
- When submitting as an organisation give a brief overview of the group. This is where you are establishing your interest and connection to the issue.
- Thank the organisation for their work in developing the plan, policy, statement or proposal. Whilst you may not agree with their position or idea, there will have been a lot of work and thinking behind the scenes to inform the proposal. It is always important to acknowledge this and to thank them for giving you the opportunity to be involved in the process.
- Introduce your position with a general statement. Provide a succinct summary of your support (or not) for the proposal. This will set the tone for the remainder of your feedback.
- Provide detailed comments on particular clauses, sections, ideas. Always provide the page or paragraph number, this makes it easier for the organisation to cross reference and provide a substantive response to the comment. Try to avoid general statements. If you do, you may get a response like "Submitters comments noted, no change is necessary".
- When providing the detailed comments, give the organisation a rationale to understand the position, "we support idea X because it will benefit the community in the following ways....", "we understand position Y, but would like to highlight that this change would negatively impact our organisation in the following way...."
- Stick to the facts and where you have evidence to support your position use it. Avoid conjecture and speculation – submitting in this way can reduce your credibility. It is however reasonable to make statements that may not have a strong external evidential base, "in the experience of our organisation, we have noticed....and the proposal will make the following difference to us..."
- The submission must relate to the issue that is being consulted on. Do not use the submission to highlight other issues you might want the organisation to know (there are other ways to do this).
- If the consultation document asks specific questions, it is very useful to answer those which you have a view on. The questions will be those issues that inform the decision making process. This does not stop you from offering a broader opinion but link it to the particular subject or issue.
- Where there is a proposal or idea that you are not supportive of, try to give some remedy or alternatives. "We would like you to consider amending your proposal to Z, this will have the

following benefits:...” It may be that the organisation has not considered your idea, or it may be that it has been considered but is not possible. This is a good opportunity to test your thinking.

- Finally, provide your group contact details and tell the organisation if you would like the opportunity to ‘talk to the submission’.

Do we need to verbally present the submission?

Whilst you do not have to, my view is yes! If you can make the time to present to the organisation this can be a powerful way to draw the decision makers attention to your submission. The verbal presentation gives your organisation a forum to sit face to face with the decision makers and expand on your position. The verbal presentation should not be used to present new information, but you can provide additional information to further build on the positions that you articulated in the written submission. Sometimes the organisation will have provided a report on the submissions received. This sets out the staff response to the submissions received. When this is available it can help to structure your talking points. There will be no need to talk in detail to the issues that the organisation has already supported you on.

What makes a good verbal presentation?

For many of us the idea of presenting to a council, board or committee can be nerve-racking. It needn't be, remember you (not the committee) is the expert on your organisation and your submission. If you have followed the guidelines in this article, presenting your submission should be as easy as ABC. Some things to remember are:

- Do not read your submission. The decision makers have already read it.
- Plan your verbal presentation. The committee will give you a short amount of time (they will tell you how long you have) and they will stick to this time. Do not go into a 10 minute submission with too many ideas. You will rush, you will feel anxious, you may forget the important points and you may not get to finish.
- Think about the key points from your written submission and plan your verbal presentation to these and the time you have available.
- Know your audience and talk at a level that is appropriate for their understanding and knowledge.
- Do not spend time providing the organisation with information about your group, remember they know this. Use the time to seek the outcome that you are looking for.
- If you have a PowerPoint presentation bring it on USB stick and prior to the submission day email it to the staff who are supporting the process. This way it will be ready for you. Make sure you can still present if the technology does not work. Have a copy of your slides and notes in hard copy format.
- If you wish to circulate additional information to the committee or board, you should generally bring enough copies with you. Give these to the committee secretary to hand out. Any handouts should be short. The committee members will not wade through lots and lots of additional data.
- Tell the committee what outcome you are seeking. This enables them to also focus on the outcome.
- Be prepared for the committee to ask questions. The questions allow them to seek more information and be clear about your position and what you are seeking.

Well done and best of luck, I hope you get the outcome you are looking for.



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Some Useful Guidance (there is lots of good stuff out there)

<https://ngo.health.govt.nz/what-we-do/priorities-and-issues/consultation-and-submissions>

<https://www.mfe.govt.nz/publications/fresh-water/everyday-guide-making-submission-about-proposed-plan-or-plan-change>

<https://www.parliament.nz/en/pb/sc/how-to-make-a-submission/>

<https://www.civilservant.org.uk/skills-submissions.html>

https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Making_a_submission

<https://www.alcohol.org.nz/in-the-community/learn-more/writing-a-submission>