

*APS review*  
submission by Edwina Barton  
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## Introduction

I wish to comment against the following aspects of the ToR in particular -

- driving innovation and productivity in the economy
- delivering high quality policy advice, regulatory oversight, programs and services
- tackling complex, multi-sectoral challenges in collaboration with the community, business and citizens.

## In brief

Having worked in the APS, across multiple portfolios, for many decades, I have observed four recurring weaknesses that I believe hold the APS back from empowering governments to achieve the best outcomes in the national interest.

These are -

1. a reluctance to forensically look for, and address, the underlying drivers of policy problems and instead a tendency to focus on band-aiding symptoms or papering over problems
2. failure to use behaviour change science when designing and delivering policy reforms and programs, in order to select interventions with the highest probability of achieving the desired policy outcome and behavioural change
3. failure to build in, fund and use evidence-based evaluation methodology to analyse whether a particular policy or program is delivering the desired policy goal or not
4. a reluctance to give frank and fearless advice, including about underlying drivers, for fear that it will not be what the executive or the minister wishes to hear.

These weaknesses seriously inhibit innovation, lead to poor policy advice, waste taxpayers' dollars, and make it almost impossible to effectively tackle complex, multi-sectoral challenges.

These problems are compounded when ministers, their advisors and senior departmental executives have little understanding of, or commitment to, the above four issues.

*Recommendation 1:* Indeed, I would go so far as to suggest that selection processes for all SES positions in all portfolios must include interrogation on all four issues, and that competency and commitment to all four must be a prerequisite to any SES appointment.

## **Band-aiding symptoms rather than addressing underlying drivers**

This weakness has several causes, in my view -

- not all public servants, even those in policy roles, have the expertise to drill down forensically into policy problems and identify the underlying drivers
- SES officers may be reluctant to ask public servants to identify underlying drivers, either because the SES officers themselves do not have strong policy analysis skills or because they fear what doing so will discover

- many ministers have a tendency - long demonstrated by studies of decision-making in the APS - to favour quick-fix 'announcables' over evidence-based long-term solutions, and to favour 'thought bubble' ideas which appeal to their world view, rather than objectively analysed policy solutions based on best available evidence.

*Recommendation 2:* The solution, in my view, is to -

- give more emphasis to proven policy skills in recruitment processes
- ask the SES to 'lift their game' by demanding that public servants put up policy proposals that address underlying drivers (not just proximate drivers) in all cases, even if doing so produces uncomfortable policy options that may challenge the minister's desire for a quick fix.

Identifying underlying drivers will often reveal complex, multi-sectoral challenges - challenges which require more than one portfolio to work on together to solve, in a whole-of-government or even whole-of-community approach. Not all of the policy levers will be in the hands of a single minister or single portfolio. Population policy and biodiversity policy are two such examples.

APS officers should never be scared of proposing multi-portfolio solutions, or of exchanging ideas with officers in other portfolios. Indeed this should be the norm, not the exception, and SES officers should be open to that type of innovative thinking and should actively encourage 'silo busting'.

### **Failure to use behavioural change science**

I commend PM&C's leadership in driving greater use of behavioural change science in policy and program design (see <http://behaviouraleconomics.pmc.gov.au>).

However many portfolios still refuse to use behavioural change science routinely when designing policies and programs, despite the excellent professional development opportunities now available to help equip APS staff to do so. (For example, I commend ANZSOG for its 'Behaviour Change in Public Policy Masterclass' which I recently completed.)

This is inexcusable, and leads to taxpayer dollars being wasted on initiatives with low probability of success, and to lack of innovation in designing initiatives.

*Recommendation 3:* I recommend that selection criteria for all APS positions responsible for policy or program design include a sound understanding of behavioural change science principles as mandatory.

### **Failure to use evidence-based evaluation methodology**

In many portfolios, I still see a reluctance to build evidence-based evaluation methodology into the design phase of policies and programs.

It is often regarded as a nuisance, something to be tacked on at the end once the initiative has been rolled out, and not properly funded.

*Recommendation 4:* This is a fatal flaw, and any SES officer who approves the funding or design of an initiative without such methodology built in does not deserve his or her

position. SES officers must demand that staff prove exactly how they will measure whether the initiative succeeds or not, including how they will analyse why it failed, if it did.

*Recommendation 5:* I recommend that selection criteria for all APS positions responsible for policy or program design include a sound understanding of evidence-based evaluation methodology as mandatory.

I commend the Canberra Evaluation Forum <https://www.act.ipaa.org.au/cef> (hosted by the IPAA) for its tireless efforts to provide free professional development opportunities to APS officers on evaluation methodology. There is no excuse for APS officers not to understand such methodology, and to be willing to advocate to their SES for its use.

### **Reluctance to give frank and fearless advice**

This is not a new weakness in the APS, but its negative effects have never been more stifling to good public policy than now, because policy problems are more complex and entrenched than ever before.

This weakness manifests itself at every level, from the humble APS5 up to Dep Sec level.

*Recommendation 6:* The solution in my view is for portfolio heads to demand frank and fearless advice, and to be willing to give it themselves - even if it's not what the minister wants to hear.

Ministers cannot function effectively if they are surrounded by 'Yes' men and 'Yes' women. A minister who does not understand this does not deserve his or her ministry, and does not deserve the confidence of Cabinet or the PM.

This weakness stifles innovation, leads to poor public policy decisions, causes complex policy problems to be left unresolved, and leads to precious taxpayer funds being wasted on window dressing or band-aiding.

I understand that it takes courage for an APS officer to say to their boss: *'No, ma'am, that's not what the evidence shows will work - if we recommend that, the policy problem will not be solved and we'll be wasting taxpayers' funds. Let me show you another option - one which the evidence does support.'*

But an APS officer who can't muster the courage to do that simply doesn't belong in the APS, and should find another job outside the APS.

### **Case study**

The Department of the Environment and Energy (DoEE), for whom I worked for 5 years, between 2008 and 2013, manifested many of these weaknesses to a troubling degree.

I fully acknowledge that successive DoEE ministers have not made it easy for DoEE officers to avoid those weaknesses, and that federally the environment space is a contested one involving many complex trade-offs between the goals of different portfolios.

But that does not excuse, in my view, the degree to which some DoEE bureaucrats fell lamely and submissively into these traps.

Indeed, for many weaknesses, I sensed in many DoEE officers a shoulder-shrugging '*We've always done it this way - no point trying to rock the boat*' passivity that undermined not only DoEE's effectiveness but the professionalism and morale of its officers.

Good officers left for greener pastures where their evidence-based policy approach was valued and had a chance of making a difference. Poor officers, who lacked the skill-set or courage to call out shallow policy design or failure to use rigorous evaluation methodology, stayed. Thus the professionalism of the entire organisation was dragged down.

I hear anecdotally that DoEE has lifted its game in some respects since I left. For example, I understand that it now has its own behaviour change unit, and I met a very astute and committed officer from that unit at the recent ANZSOG behaviour change masterclass. I have also heard indirectly that many highly committed and courageous senior officers remain at DoEE despite the severe cutbacks and political challenges it has faced.

I wish DoEE every success - it is one of the the most crucial portfolios in the Australian Government, and it deserves every opportunity to be a global exemplar.

My DoEE experience is now somewhat dated, and I cannot give concrete examples from my experience without breaching the APS Code of Conduct. Were it not for that limitation, I would be happy to do so. I can only say that I found some of those instances quite shocking at the time, and it was part of the reason I left.

### **In conclusion**

I would be happy to elaborate further on any aspect of my submission, if that would assist the review.

I have summarised my recommendations below.

Thank you for the opportunity to comment.

Yours faithfully

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### **Summary of recommendations**

*Recommendation 1:* That selection processes for all SES positions in all portfolios must include interrogation on the following four issues, and that competency and commitment to all four must be a prerequisite to any SES appointment:

1. willingness to address the underlying drivers of policy problems, not just the proximate drivers or symptoms
2. willingness to require use of behaviour change science in design and delivery of policy reforms and programs
3. commitment to use of evidence-based evaluation methodology in design of policy reforms and programs

4. willingness to give frank and fearless advice, including about underlying drivers of policy problems.

*Recommendation 2:* That more emphasis be given to proven policy skills in recruitment processes for positions that involve designing, delivering or reporting on any policy reform or program.

*Recommendation 3:* That selection criteria for all APS positions responsible for policy or program design include a sound understanding of behavioural change science principles as mandatory.

*Recommendation 4:* That SES officers demand that staff prove exactly how they will measure whether a policy reform or program initiative succeeds or not, including how they will analyse why it failed, if it did.

*Recommendation 5:* That selection criteria for all APS positions responsible for policy or program design include a sound understanding of evidence-based evaluation methodology as mandatory.

*Recommendation 6:* That portfolio heads demand frank and fearless advice from everyone in their portfolio, and that they be willing to give it themselves - even if it's not what the minister wants to hear.