

12 July 2024

Mr Matthew Roper  
First Assistant Secretary  
Department of Infrastructure, Transport, Regional Development, Communication and the Arts  
GPO Box 594  
Canberra, ACT 2601

SUBMITTED VIA PORTAL:

[www.infrastructure.gov.au/have-your-say/national-urban-policy-australia](http://www.infrastructure.gov.au/have-your-say/national-urban-policy-australia)

Dear Mr Roper

Submission: Draft National Urban Policy

IAP2 Australasia, as the peak body for the community and stakeholder engagement sector, welcomes the opportunity to provide a submission on the Draft National Urban Policy and commend the Department for their continued leadership on this important initiative.

During the development of the Draft National Urban Policy, IAP2 Australasia has previously provided feedback in its capacity as member of **Urban Policy Consultation Network**. Our submission to the department advocated for engagement to be embedded into the National Urban Policy.

Since our last submission to the Department, IAP2 have presented our newest thought leadership paper, "Groundbreakers and Transparency Makers: the Role of Engagement in ESG" (paper attached) at Parliament House, Canberra. The report acknowledges the vital role engagement plays in the credibility of ESG reporting, and advocates to uplift engagement to decision making and strategic levels across all three ESG pillars.

**"ESG practices that elevate and prioritise the role of engagement help to counter the abiding lack of trust in government and to rebuild trust in democracy."**

Via the Draft National Urban Policy, the Department has the opportunity to lead on **reinforcing the value of genuine engagement in policy and regulatory frameworks**, not only to increase trust in the democratic process, but also as a platform for improved environmental, social and governance outcomes.

We have reviewed the Departments Draft National Urban Policy through the lens of the five recommendations for engagement to be embedded into policy and regulatory frameworks, as provided in our earlier submission. The Part 1: Introduction of the Draft National Urban Policy offers a suitable juncture succinctly provide a few short paragraphs establishing the fundamental importance of inclusive and accessible engagement in this policy and any subsequent policies and frameworks taking direction from it.

We offer the following suggested actions to strengthen the policy, either in **Part 1: Introduction or subsequent sections throughout the policy**:

1. **Be clear what engagement is and see engagement as an opportunity**
  - Define engagement. IAP2 has a definition for use [here](#) (on page 11).
  - Include or refer to the [IAP2 Public Participation Spectrum](#) for clarity of terminology. The Draft National Urban Policy currently uses consult and collaborate though these terms may have different interpretations and inherent promises across differing audiences.
  - Summarise the **importance of engagement at the policy and regulatory framework level**, as well as at every subsequent stage of program or project development and delivery for the improvement of ESG outcomes.
2. **Set and maintain standards for engagement**
  - Reflect engagement in an adjustment to the wording in the in the Draft National Urban Policy **Principles**.
  - Articulate the need for inclusive and accessible engagement design and delivery to be provided by **appropriately qualified engagement professionals**.
  - Beyond articulating the First Nations engagement that went into informing the Draft National Urban Policy, provide direction on the **IAP2 aligned standard of engagement** those taking direction from the policy around First Nations considerations would be expected to align with.
3. **Link the requirement for engagement to funding**
  - Strengthen the call to all governments (including laterally across departments) to **appropriately resource** professionally designed engagement design and delivery.
  - Strengthen the commitment around engagement in discussion of **2023-2024 funding initiatives** to use consistent, meaningful and accountable engagement terms.
  - **Link materiality to IAP2 Core Values**. For more on this, refer page 24 of the IAP2 “Groundbreakers and Transparency Makers: the Role of Engagement in ESG” publication (paper attached).
4. **Include community engagement as a key strategic consideration in projects**
  - Include inclusive and accessible engagement prioritisation in the articulation of the **Purpose** of the Draft National Urban Policy. This will by extension improve outcomes for other national priority agendas, such as housing, productivity, social cohesion, disaster resilience and climate action.
  - **Avoid specificity** around how or what engagement should be undertaken (specificities such as codesign or consultative committees), rather articulate the requirement for **suitably qualified engagement practitioner** advice and delivery.
5. **Further recommendations and calls to action**
  - **Call 1: Ensure authentic engagement**
    - Embed an expectation that inclusive and accessible engagement be a core inclusion in all policy and frameworks, to enable earlier and ongoing engagement that delivers **better informed** and **better aligned outcomes**.
  - **Call 2: Demonstrate a commitment to social accountability**
    - Embed an expectation that inclusive and accessible engagement be a core inclusion in policy and frameworks, to enable earlier and ongoing engagement that delivers **strengthened collaboration** and **improves transparency**.

- **Call 3: Improve environmental, social and governance outcomes**
  - o Better define the **Departments role** and the **role of the Draft National Urban Policy** in provision of leadership to add rigour around inclusive and accessible engagement prioritisation.
  - o Address **accountability** and the need for a **rigorous evaluation framework** that links back to the IAP2's core values.

We would welcome the opportunity to meet with you and/or relevant officials to discuss IAP2 Australasia's submission. We would also welcome the opportunity to facilitate a broader discussion with our membership, noting that our members have considerable expertise and can share lessons learned from their previous engagements.

To organise a meeting, please contact me at [marion@iap2.org.au](mailto:marion@iap2.org.au) .

Kind regards



Marion Short  
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