



BCRRA Inc

Bass Coast Ratepayers & Residents Association
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Communications Office
Bass Coast Shire Council
Via email to communications@basscoast.vic.gov.au

BCSC Draft Community Engagement Policy 2021

Dear Communications Team,

Having reviewed this draft, BCRRA considers that significant changes are required to render this policy into a meaningful document that the community can trust and understand.

The role of a Council and the councillors is to provide good governance in its municipal district for the benefit and wellbeing of the municipal community. Bass Coast Shire Council states a commitment to actively encourage individuals, groups and communities to be involved in local government through community engagement, and frequently speaks of improving their engagement with the community. The Draft Community Engagement Policy 2021 provides high level statements of intent, but few substantive guidelines by which the process may be guided and protected.

The policy does not address several principles defined in, and required to be effected by, the Local Government Act 2020.

- The policy does not provide for the engagement process to have a clearly defined objective and scope as required by LGA Part 3 56(a). Furthermore Council's Communication and Engagement strategy³ requires the person developing the engagement to 'Set the Purpose'.
- The policy does not state that participants will be given access to objective, relevant and timely information to inform their participation as required by LGA Part 3 56(b).
- The policy does not state that participants are entitled to reasonable support to enable meaningful and informed engagement as required by LGA Part 3 56(d)

The policy describes "deliberative engagement"; the principles outlined for this process are

- authentic engagement with the community
- good representation of the community in engagement activities
- clear demonstration of how all views have been considered
- accessible and relevant information available to the community to ensure the
- decision-making process and the community's level of influence is clear in each
- instance and that participants are fully informed.

These principles describe what most reasonable members of the community would expect from any engagement processes, and are defined as such by the LGA guidelines^b.

Council is required by legislation to consider community engagement, such as when a proposed change or decision is likely to:

- have significant impact on quality of life in the region
- impact on services or facilities for residents and ratepayers
- have a significant budgetary impact
- involve a level of conflict, controversy or sensitivity

The above principles should direct all community engagement undertaken by Council and not be limited to only the 4 documents nominated (Community Vision, Council Plan, Financial Plan – Ten Year Asset Plan).

The policy should state that it applies to all areas of Council operations and covers all community engagement activities undertaken. Without such a statement the policy lacks genuine commitment to full and proper community involvement in decision making.

The policy only states that Council will explain what community engagement was conducted and how it influenced decision-making. It does not commit to ensuring the public's contribution will influence decisions, only whether the contribution was used. This also implies a lack of genuine commitment to full and proper community involvement in decision making.

The policy states "The best decisions will be made if those affected by the outcome have had the appropriate opportunity to participate in the process". Despite stating that Council will actively seek to connect with the community, including those who are hardest to reach, it fails to define how it will ensure that all potentially affected community members will be included in the process.

The policy does not set out how a reasonable engagement period is determined. Council's poor response to community engagement as it pertains to previous initiatives can in part be attributed to a failure of the Council and councillors to allow for a reasonable timeframe for people and associations to voice concerns, air grievances and devise adequate responses. (The consultation period for this policy is one such example. We note that other Victorian Councils had draft policies available for comment earlier in 2020 and for more reasonable periods). The Council must improve this for any future community engagements to be effective, as otherwise they make the choice to actively limit the voice of the community.

We look forward to receiving a response from you outlining how you will address these issues and deliver a policy with true value to the community.

Yours faithfully

Bass Coast Ratepayers and Residents Association



p.p. Andrew Marston, Secretary

^a <https://d2n3eh1td3vwdm.cloudfront.net/general-downloads/Communications/2018-04-27-Communication-and-Engagement-strategy-revised-March-2018.pdf>

^b https://www.localgovernment.vic.gov.au/_data/assets/word_doc/0024/461508/Local-Government-Act-2020-Principles-Community-Engagement.docx