

Submission by the Equal Opportunity for Women in the Workplace Agency to the Advisory Group on the Reform of Australian Government Administration

Overview and summary

The Equal Opportunity for Women in the Workplace Agency (EOWA) Agency has regulatory oversight of the Equal Opportunity for Women in the Workplace Act 1999 (the EOWW Act). The Agency's role is to receive reports from non-government employers of 100 or more employees on measures taken by those organisations to provide equal opportunity for women. EOWA collects and analyses this information and provides reporting employers with feedback and advice on how to further develop their equal opportunity programs. As of July 2009, the Agency received, entered and evaluated reports from organisations employing around 23 per cent of Australian employees. The Agency brings this experience to bear in its submissions in relation to managing gender equality in the Australian Government administration.

EOWA is a small agency in the FAHCSIA portfolio based in Sydney. In 2008-09 its resources supported 14 ongoing staff and 16 non-ongoing staff. It brings its experience as a small regulatory agency based outside the ACT to bear in its submissions in relation to means of strengthening a culture of external engagement, both across and beyond the APS.

The same perspective informs its recommendations in relation to improving the efficiency of corporate support services for small agencies.

Recommendations

- **Managing gender equality in Australian Government administration**

Recommendation 1: Commonwealth authorities and APS agencies employing 100 or more staff should be required to comply with the EOWW Act in order to satisfy their legislated responsibilities for gender equality.

- **Strengthening a culture of external engagement, both across and beyond the APS**

Recommendation 2: Departments should support the co-location of their regional offices and portfolio statutory agencies in a common geographic area by offering to provide hub facilities (refer Recommendation 9 for more details) to enable heads of small statutory agencies to participate in the weekly meetings held in departmental central offices to canvass ongoing and emerging policy development activities.

Recommendation 3: Departments should undertake a regular census of their databases, including the holdings of portfolio statutory agencies, and ensure that these are made known to all departmental staff engaged in research and policy development.

Recommendation 4: The Commonwealth should develop a single APS portal offering public servants a comprehensive view of available Government datasets building on the public information datasets being collected at National Statistical Service's Statistical Collections Directories.

Recommendation 5: All Australian Government agencies putting publications onto their websites should be required to publish them at the same time to a common Government site and tag them so that APS researchers can readily search and access material relevant to a single policy issue from all portfolios.

Recommendation 6: If the Advisory Group's proposal relating to 'strategic policy' hubs is pursued, steps should be taken to ensure that each agency's internal knowledge transfer around policy development is not diminished.

Recommendation 7: Regardless of its findings in regard to 'strategic policy' hubs, the Advisory Group should encourage the development of public service Communities of Practice (CoPs) along fault lines where policy interests overlap but portfolio responsibilities do not. These CoPs should be encouraged to share research resources, frontline knowledge and policy ideas.

- **Improving the efficiency of corporate support services for small agencies**

Recommendation 8: Before taking any measures to increase the efficiency of support services for small agencies, the APS undertake a census of the services that they require.

Recommendation 9: While recognising that different arrangements for support services will suit different agencies, EOWA recommends that the Advisory Group give favourable consideration to shared service hubs supporting agencies located within the same geographical area, or, alternatively, that larger co-located agencies support smaller agencies by making required expensive infrastructure such as video conferencing and secure faxing available for use when needed. In addition to providing these facilities, hub accommodation could enable regional offices and portfolio statutory agencies to share rental, telephone costs and common accounting systems, support for recruitment activities, travel, and procurement, and ministerial and parliamentary support services.

Recommendation 10: The management of any shared services should be structured in such a way as to prevent the emergence a pecking order among service sharers, in which larger agencies are likely to receive priority and often better tailored services.

Submission

EOWA's submission addresses three of the issues raised for consideration by the Advisory Group in its discussion paper: the need to enhance workforce gender equality, the means of strengthening a culture of external engagement, both across and beyond the APS, and efficiency issues in corporate support arrangements for small agencies.

Managing gender diversity in the APS

Background

The recent report of the House of Representatives Standing Committee on Employment and Workplace Relations *on Pay equity and increasing female participation in the workforce* provides a summary overview of the range of economic benefits associated with increasing women's participation in the workforce. In particular, it cites evidence put to it of gains in gross domestic product and national productivity, more efficient allocation of labour, reduced turnover, increased efficiency and the impact of all these on tax and welfare systems.¹ Less often emphasised but especially critical at a microeconomic level is the influence of workplace culture on effective work organisation, the creativity and adaptiveness of organisational responses, and the capacity of organisational leadership to recognise and encourage innovation and responsiveness. The causal links between gender equality and an open and adaptive workplace culture are not linear but the Agency has found evidence, particularly in its EOWA Employer of Choice for Women organisations, that they are almost always found together in individual workplaces and businesses.

The Government itself has referred on a number of occasions to the productivity gains to be made from taking measures to support gender equality in the workplace. These include both gains for large businesses² and gains for the economy as a whole.³

Importantly, the Government has recognised that there is also an equity case to be made for organisational change, that 'greater equality economically and socially between men

¹ House of Representatives Standing Committee on Employment and Workplace Relations, *Making it Fair: Pay equity and associated issues related to increasing female participation in the workforce*, Canberra, 2009, paras 1.2ff., at <<http://www.aph.gov.au/house/committee/ewr/payequity/report.htm>>.

² 'Over the last decade, the agency has worked with thousands of large businesses to improve opportunities for women in the workplace. These employers are now reaping the benefits by attracting and retaining the best talent, improved morale and increased employee effectiveness.' The Hon Tanya Plibersek, Launch of the EOWA Survey on paid maternity leave, sex-based harassment initiatives and the gender pay gap, Parliament House, Canberra, 20 August 2009, at <http://www.tanyaplibersek.fahcsia.gov.au/internet/tanyaplibersek.nsf/content/tp_eowasurvey_20august2009.htm>.

³ 'Improving women's earning capacity and extending their choice of jobs will not only aid women's own economic security and increase well-being and personal satisfaction but will lift our country's productivity... Financially and socially, we can be better off with more women in the workforce, especially in under-represented occupations.' The Hon Julia Gillard, Address to the Serious Women's Business Conference, 9 November, 2009 <http://www.deewr.gov.au/Ministers/Gillard/Media/Speeches/Pages/Article_091109_181844.aspx>.

and women...strengthens our nation' while 'inequality harms us all'.⁴ These arguments are as applicable to the Government as an employer as they are to the non-government employers covered by the EOWW Act.

Current arrangements in the APS

Two main pieces of legislation govern employment equity in Commonwealth government employment. The *Equal Employment Opportunity (Commonwealth Authorities) Act 1987* (the EEO (CA) Act) covers those non-APS Commonwealth authorities employing 40 or more employees (including bodies with a mix of non-APS and APS employees), and section 18 of the *Public Service Act 1999* covers agencies employing staff under that Act.

Equality arrangements under both pieces of legislation are more broadly based than those applying under the EOWW Act. The EEO (CA) Act requires Commonwealth authorities to promote equal opportunity in employment for women and members of designated groups, including Aboriginal and Torres Strait Islander peoples, people from a non-English speaking background and people with a physical or mental disability. Directions put in place to implement section 18 of the Public Service Act similarly require Agency Heads to put in place measures to eliminate employment-related disadvantage on the basis of being an Aboriginal or a Torres Strait Islander under the meaning of the Racial Discrimination Act 1975; gender; race or ethnicity; or physical or mental disability.

Both the EEO (CA) Act and the Public Service Commissioner's Directions call for an annual report. Commonwealth authorities are required to report annually to their responsible Minister on the development and implementation of their programs; APS Agency Heads must also report annually on the effectiveness of their workplace diversity programs (clause 3.5) and review their program at least once every four years to ensure that it continues to give effect to the APS Values and achieves its outcomes (clause 3.6).

No overview of Commonwealth authorities' programs or reports is available. An overview of APS programs and reporting arrangements suggests that they are not rigorously managed. As part of the survey conducted for the 2008-09 State of the Service Report, agencies were asked whether they had a workplace diversity program in place. Less than three quarters (71 per cent) of agencies reported having a workplace diversity program in place; more than one-fifth of agencies (23 per cent) said their program was still being developed; 6 per cent did not have one at all. Of those agencies that did have a program, 49 per cent said it was currently being reviewed. Ten per cent

⁴ The Hon Tanya Plibersek, 'Women and Men - A new conversation about equality', The Sydney Institute, Sydney, 7 November 2008, at http://www.tanyaplibersek.fahcsia.gov.au/internet/tanyaplibersek.nsf/content/women_equality_07nov08.htm.

of agencies said their program had never been reviewed.⁵ Around one third of respondents to the 2007-08 State of the Service employee survey did not agree that their organisation was committed to creating a diverse workforce⁶; and only 43 per cent agreed that the SES in their agency were personally active in their efforts to improve equality and diversity in employment.⁷

The Australian Public Service commission (APSC) itself does not appear to have evaluated the effectiveness of agency diversity programs since 2004⁸ and was silent on whether or not existing strategies were being fully implemented or were effective.

The focus of service-wide effort in relation to diversity appears to be on those two groups whose employment levels have actually contracted: employees with a disability and Indigenous employees. The proportion of employees with a disability in the APS has been steadily falling, reaching a low of 3.0% in 2009. Indigenous employment has also been falling, though at a slower rate—from 2.7% in 1999 to 2.1% in 2009. The APSC has invested considerable effort and resources in developing and supporting a strategic approach to the employment and retention of those in these groups⁹, as have a number of individual agencies.¹⁰

The employment of women in the APS has, conversely, seen strong upward growth, reaching 57.8% of the workforce in 2009. So, too, have promotion rates for women overall, though from a lower base than those of men. Partly as a consequence of this headline employment data, the APS as a whole does very little strategically to support the gender diversity of its workforce. It is difficult to gauge the extent and nature of agency-specific efforts, as these are not being reported in the State of the Service Report, which in 2007-08 simply noted that:

The APS continues to make progress in addressing employment-related disadvantage for women which is reflected in their improved representation, especially at higher classifications. Specific trends in women's employment are highlighted in other chapters where they are significant.¹¹

As such it is difficult to establish whether there are there any gender equality issues in the APS. Given the headline data, perhaps the APS should continue to focus its energies on recruitment and retention issues for Indigenous employees and employees with a

⁵ Public Service Commissioner, *State of the Service Report 2008-09*, Canberra, 2008, p. 22, at <<http://www.apsc.gov.au/stateoftheservice/0809/index.htm>>.

⁶ Australian Public Service Commission, *2008-09 State of the Service Employee Survey*, question 70g, p. 44.

⁷ *Ibid.*, question 62d, p. 39.

⁸ See Public Service Commissioner, *State of the Service Report 2003-04*, Canberra, 2004, pp. 142-44.

⁹ See the APSC's website at <<http://www.apsc.gov.au/publiccalling/index.html>> for a range of measures in place to support Indigenous employment, and <<http://www.apsc.gov.au/abilityatwork/index.html>> for resources to support the employment of people with a disability.

¹⁰ See Public Service Commissioner, *State of the Service Report 2007-08*, Table 3.8 for activities to support people with a disability, and Table 3.5 for activities to support Indigenous employees.

¹¹ *Ibid.*, 40.

disability, and transfer responsibility for gender equality in the APS to EOWA, which already has responsibility for other sectors.

Are there any gender equality issues in the APS?

EOWA has already canvassed this question briefly in its submission to the Government's review of its functions.¹²

The APSC has made submissions to the Parliamentary Pay Equity Inquiry to the effect that if current trends for promotion rates, engagement rates and separation rates are projected out, women will reach parity with men in the APS in 10 years.¹³ This forecast is repeated in the most recent State of the Service report¹⁴, despite the fact that the report also noted that women's representation in the SES did not increase in 2009, and in fact fell for both SES 2 (from 34.9% to 34.5%) and SES 3 (from 27.4% to 25.7%).¹⁵

The Commission presented the Inquiry with remuneration data (defined as base salary plus allowances) for each APS employee taken from APS Employment Database (APSED). The data indicated that at June 2007 the median remuneration for women at the APS-wide level was less than that for men by between 1.5 and 6 percentage points at different classification levels (except for APS 4 where there was no difference). The Commission reported that analysis of the APSED data suggested that a key reason for the gap was the longer median length of service that male employees had accumulated at nearly all classification levels.¹⁶ Taken in conjunction with projected classification profiles, this analysis underpinned the conclusion that the passage of time would resolve pay equity issues in the APS.

It is not clear whether the Commission's projection of eventual gender parity in the APS assumes that at present there are no significant barriers to gender equality except the passage of time, or whether it assumes that any remaining barriers will be removed by cultural change as women progress into management positions. In either case, it is worth noting that APSED data does not take in performance pay, and that those surveys

¹² See the Agency's website at http://www.eowa.gov.au/Information_Centres/Resource_Centre/EOWA_Publications/EOWA_Inquiry_Submissions.asp.

¹³ Hansard, House Of Representatives Standing Committee on Employment and Workplace Relations, Pay equity and increasing female participation in the workforce, Canberra, 16 October 200, p. 11 at <http://www.aph.gov.au/hansard/reps/commtee/R11398.pdf>.

¹⁴ 'Women's representation continued to increase this year. Women outnumber men at all classifications up to and including APS 6. Fifteen years ago, the 'cross-over' point was APS 4. Based on current trends, women are likely to reach equal representation at the EL 1 classification within two years, and at the SES 1 classification within 10 years.' Public Service Commissioner, *State of the Service Report 2008-09*, p. 7.

¹⁵ Public Service Commissioner, *State of the Service Report 2008-09*, p. 8.

¹⁶ Public Service Commissioner, Submission to the Inquiry into pay equity and associated issues related to increasing female participation in the workforce, para 8, at <http://www.aph.gov.au/house/committee/ewr/payequity/subs/sub102.pdf>.

that do, do not disaggregate their findings by sex.¹⁷ To the best of the Agency's knowledge the most recent publicly available and disaggregated data on performance pay in the APS is contained in the ANAO's Audit Report No.6 2004–05, *Performance Management in the Australian Public Service*, and the indications here are of a significant pay equity problem. As Table 8.3 (below) from that audit shows, the total amount of bonuses paid across all staff classification levels to male staff was \$23.3 million (62 per cent) and to female staff was \$14.5 million (38 per cent). The average bonus paid from these amounts to male staff was \$4035 and to female staff was \$2791. This means that, on average, male staff received 31 per cent more than female staff. The average bonus paid to male staff exceeded the average bonus paid to female staff for APS3 and all classification levels from APS5 to SES.¹⁸ This is not an area where median length of service should be a determining factor.

Table 8.3
Bonuses by gender, 2002–03

Gender	Total number of staff	Number eligible	% total staff eligible	Number who received	% eligible who received	Smallest bonus \$	Largest bonus \$	Average bonus \$	Total cost \$m	% total cost
Male	39 866	11 601	29	5 780	50	21	34 000	4 035	23.3	62
Female	52 972	9 433	18	5 201	55	10	30 000	2 791	14.5	38
Total	92 838	21 034	23	10 981	52				37.8	100

Source: ANAO survey of APS agencies

Note: Data on bonus payments by gender was supplied by 47 agencies.

Though the ANAO data is six years old, and though performance pay itself features less in current pay arrangements, the ANAO findings suggest that, despite having a narrower formal gender wage differential than private sector employers in base pay and allowances, the APS is likely to have pay equity issues that will not be resolved by the passage of time alone. This was also found, against expectations, to be the case in the broader New Zealand public sector.¹⁹

¹⁷ Department of Education, Employment and Workplace Relations, Supplementary Submission to the House of Representatives Inquiry into pay equity and issues associated with women's labour force participation <<http://www.aph.gov.au/House/committee/ewr/payequity/subs/sub58.1.pdf>>.

¹⁸ ANAO Audit Report No.6 2004–05 Performance Management in the Australian Public Service para 8.24.

¹⁹ Hansard, House Of Representatives Standing Committee on Employment and Workplace Relations, Pay equity and increasing female participation in the workforce, Canberra, 13 August 2009, Canberra, p. 10, at <<http://www.aph.gov.au/hansard/reps/commtee/R12308.pdf>>.

Other gender equality issues in the APS have been raised before the Parliamentary Pay Equity Inquiry. These include data indicating a tendency for those agencies with higher proportions of women to be lower down the salary range than those agencies that employ fewer women. The Inquiry also received evidence that women who had taken maternity leave since the 2000-01 financial year had experienced comparatively lower rates of promotion than other female employees in their age cohort, and that similar data compiled for subsequent year cohorts tended to confirm the conclusion that the taking of maternity leave in the APS has a negative effect on career progression.²⁰ Finally, the Inquiry has raised the question of access to flexible working time arrangements and the reduced training and promotion prospects of staff (mainly women) who use such arrangements, particularly at senior classifications.²¹

Overall, the available data does little more than suggest that the pay equity gap is narrower for women in the APS than for women generally, and that women's rates of promotion have generally been relatively good. We know little about organisational initiatives apart from levels of part-time and non-ongoing employment, and neither of these is positively correlated with strong prospects for training or career development. In fact, where traditional workplace cultures operate, these flexibilities have tended to be focused on improvements to the bottom line that is not necessarily supportive of gender equality within organisations, and to be pursued at the expense of culturally more difficult areas of occupational segregation and enhancing women's leadership. There are no clear indicators of whether women in APS agencies do or do not experience an adaptable, flexible culture in which they can participate equally and be treated as equals, both in day-to-day operations and in strategic policy development.

Should the APS and Commonwealth authorities be covered by the EOWW Act?

The nature and extent of gender equality issues in the APS are only partly relevant to the question of whether agencies employing 100 or more should in future address gender equality on the same terms as the private and not-for profit/community sectors, non-government schools, trade unions, group training organisations and higher education institutions. To the extent that such issues need to be addressed, APS agencies would benefit from coverage; to the extent that agencies are model employers, the extension of coverage would enable them to contribute to the Government's goal of broader gender equality by taking a leadership role.

The House Standing Committee on Employment and Workplace Relations has signalled its interest in the leadership role that the Government as an employer has to play in

²⁰ Public Service Commissioner, Supplementary Submission to House Standing Committee on Employment and Workplace Relations, Inquiry into pay equity and associated issues related to increasing female participation in the workforce, at <<http://www.aph.gov.au/house/committee/ewr/payequity/subs/sub102.1.pdf>>.

²¹ See interview with the Chair of the Inquiry in Steven Scott, 'Labor Push to Improve Women's Pay', *Australian Financial Review*, 10 November 2009, pp. 1 and 60.

promoting pay equity within the Commonwealth public service.²² As a consequence, it has recommended that all federal public sector organisations be required to report biennially to the Pay Equity Unit within Fair Work Australia (into which it recommends that EOWA's current functions are to be subsumed) on the implementation of a diversity plan to increase pay equity.²³ More broadly, it has also recommended that all federal public sector organisations be required to report biennially to the Pay Equity Unit within Fair Work Australia on the implementation of a gender equity duty in relation to employees and in service provision.²⁴ Submissions to the review of the Equal Opportunity for Women in the Workplace Act and Agency, to the extent that these are available to the Agency, also support the extension of the coverage of the EOWW Act to the APS, and note that employment practices have become increasingly similar across public and private sectors since the New Public Management reforms began to be phased in.

There are a relatively small number of Commonwealth public service agencies (103; of which 76 employ more than 100 persons). Including these agencies among the organisations required to report under the Act, should not be unduly resource intensive for EOWA. At the same time the Agency is proposing as part of its own review, new reporting arrangements that should minimise the resources APS agencies would be required to commit to the reporting process. These new reporting arrangements are designed to set out a clear gender equality agenda as well as to take organisations through that agenda. In many cases they call for measures that would also support agencies' important efforts to improve the employment and retention of Indigenous employees and people with disabilities. The sanctions available to the Agency for responding to non-compliant organisations would add significantly to the current incentive for agencies to address their responsibilities for gender equality.

The same arguments apply to Commonwealth authorities as to APS agencies: meeting the requirements of the EOWW Act could be taken to satisfy equal opportunity requirements for Commonwealth authorities employing 100 or more staff as well as for APS agencies.

Recommendation 1: Commonwealth authorities and APS agencies employing 100 or more staff should be required to comply with the EOWW Act in order to satisfy their legislated responsibilities for gender equality.

²² House of Representatives Standing Committee on Employment and Workplace Relations, *Making it Fair*, para 7.4.

²³ House of Representatives Standing Committee on Employment and Workplace Relations, *Making it Fair*, recommendation 25, p. 223.

²⁴ House of Representatives Standing Committee on Employment and Workplace Relations, *Making it Fair*, recommendation 26, p. 223.

Strengthening a culture of external engagement, both across and beyond the APS

EOWA is a small agency located in Sydney. As a regulator it is primarily engaged with the employers of 100 or more in the private and not-for profit/community sectors, non-government schools, trade unions, group training organisations and higher education institutions. In 2008-09 it received reports from, conferred with, and surveyed 2556 (covering in excess of 9000) of these organisations. Often it receives direct commentary from business given in the expectation that this will feed into relevant policy development (eg on industry workplace relations issues). It also maintains a database that supports analysis and aggregation of annually reported report data.

The Agency thus has both direct frontline experience of business interests and a data set that extends back to 2001 and covers the seven employment matters designated in the Act, namely

- the recruitment procedure, and selection criteria, for appointment or engagement of persons as employees;
- the promotion, transfer and termination of employment of employees;
- training and development for employees;
- work organisation;
- conditions of service of employees;
- arrangements for dealing with sex based harassment of women in the workplace;
- arrangements for dealing with pregnant, or potentially pregnant employees and employees who are breastfeeding their children.

This data set goes to a number of areas of government policy that overlap gender equality issues, including skills shortages, apprenticeships and traineeships, some education practices and priorities, human resource strategies for changing work organisation, employer approaches to the implementation of paid maternity leave, Indigenous employment initiatives, developments in employer-provided child care, and the structure and remuneration of Boards in the ASX top 200 companies. Very little of this evidence finds its way into APS strategic policy development.

It is likely that the Agency's situation is duplicated elsewhere, particularly in the case of other small portfolio statutory agencies at a distance from their central offices. In the

Agency's view there are a number of reasons why policy-making fails to draw effectively on the frontline experience of such agencies.

Top down issues

Small agencies are generally unaware of Government portfolio policy priorities that are in the early stages of development and have yet to be publicly announced. This is an ongoing problem that feeds on itself: assumptions that small agencies are irrelevant ensure their irrelevance.

- Heads of small agencies are not likely to be included in regular meetings with portfolio secretaries in which central office division heads identify weekly developments and emerging priorities. In fact it is more common for portfolio departments to hold separate meetings for heads of small agencies with different agendas at wider intervals. As a consequence the issue of small agency relevance to any policy development process is determined on a top down basis by those who are outside the small agency and therefore in a weaker position to judge the extent of its information resources.
- Because of their location outside central offices and often in isolation from other public service agencies, staff in small agencies remain outside informal central office networks through which many APS staff exchange research and policy advice.
- Many small agencies, like EOWA, do not have the resources to invest in relevant technology such as video conferencing and other technologies.

Recommendation 2: Departments should support the co-location of their regional offices and portfolio statutory agencies in a common geographic area by offering to provide hub facilities (refer Recommendation 9 for more details) to enable heads of small statutory agencies to participate in the weekly meetings held in departmental central offices to canvass ongoing and emerging policy development activities.

Recommendation 3: Departments should undertake a regular census of their databases, including the holdings of portfolio statutory agencies, and ensure that these are made known to all departmental staff engaged in research and policy development.

Bottom up issues

Small portfolio agencies themselves find it difficult to establish informal networks that would enable them to offer data to underpin policy development where that data is available in the Agency and required in other parts of the APS. For small agencies, this is a resourcing issue: staff would need to take responsibility for identifiable data subsets (eg employer intentions in implementing paid maternity leave) and for identifying and contacting APS staff in central office and other agencies with a subject matter interest in that data. They would also need to maintain ongoing contact with interested individuals. Further, small agencies such as EOWA would need to be in a position to make their data analysts available for response to information requests, or would require resources to improve their data interface so that the database could be used by APS staff outside the Agency.

The Agency is aware that the issue of data sharing has been before Government since the Management Advisory Committee's work on *Connecting Government*, and is also aware of initiatives such as the National Government Information Sharing Strategy²⁵ and the National Statistical Service's²⁶ Community of Practice. Both of these important initiatives tend, however, to focus on data sharing partnerships, and the identification at high level of those datasets that should be shared. This model is unlikely to lead large agencies like DEEWR to become aware of data held in (for example) small FAHCSIA portfolio agency databases.

The Agency sees value in pursuing a single portal offering a comprehensive view of available Government datasets, building on the public information datasets being collected at National Statistical Service's Statistical Collections Directories.²⁷ The Agency recognises that such a comprehensive resource would take some time to put together. There may however be scope in the interval to compile a simpler resource by requiring all agencies putting publications onto their websites to publish them at the same time to a common Government site. Each publication could be required to be tagged with keywords so that APS researchers could readily search and access relevant material from all portfolios. This process may also have the effect of linking researchers to databases underpinning agency publications and to increased networking with frontline APS staff.

Recommendation 4: The Commonwealth should develop a single APS portal offering public servants a comprehensive view of available Government datasets building on the public information datasets being collected at National Statistical Service's Statistical

²⁵ See <<http://www.finance.gov.au/publications/national-government-information-sharing-strategy/docs/ngiss.pdf>>.

²⁶ See <<http://www.nss.gov.au/nss/home.nsf>>.

²⁷ See <<http://www.nss.gov.au/nss/home.NSF/pages/Statistical+Collections+Directories?OpenDocument> <http://data.australia.gov.au/>>.

Collections Directories.

Recommendation 5: All Australian Government agencies putting publications onto their websites should be required to publish them at the same time to a common Government site and tag them so that APS researchers can readily search and access material relevant to a single policy issue from all portfolios.

Lateral issues

Strengthening engagement across agencies has been on the reform agenda since the development of *Connecting Government*. EOWA has particular experience in this regard as it sits on a fault line between discrimination policy (Attorney-General's Department), women's policy (FAHCSIA) and employment, workplace relations, training and education policies (DEEWR) and has recently moved between portfolio agencies. Women's policy itself further spans nearly all portfolios. At present lateral information flows through an IDC mechanism put in place and chaired by the Office for Women in FAHCSIA; however, this mechanism is by its nature periodic in its timing, selective in its subject matter, and top down in its priorities. Neither the Director of EOWA nor the Sex Discrimination Commissioner is able to be represented on the IDC considering women's policy because their organisations are not inside a portfolio agency.

The Agency has taken an interest in the Communities of Practice (CoPs) that have been provided for local governments in the UK and Scotland. As the Advisory Group will be aware, the benefits of CoPs lie in providing a collaborative IT infrastructure that connects people to other people in a personal format and real time. Members can post questions about data and research resources and intersecting issues affecting a policy priority and receive practical operational suggestions from experienced colleagues across the APS (and other jurisdictions) on a day to day basis. CoPs are characterised by member autonomy, practitioner-orientation and informality. They encourage adaptiveness by creating connections across organisational and geographic boundaries, and for this reason they are also well suited to staff in small and regionally-based agencies. The peer-to-peer learning activities typical of CoPs offer a complementary resource and professional networking opportunity. Membership of a CoP can be confined through the use of password-only access.

While the Agency is attracted by the proposal in the Advisory Group's discussion paper relating to 'strategic policy' hubs, it is concerned that they might have a longer term de-skilling effect by concentrating strategic policy development activities outside departments, so that internal knowledge transfer around policy development does not occur. Further, it is unlikely that 'strategic policy' hubs would invite participation by numbers of small agency staff, or that small agencies would be comfortable losing key staff to a 'strategic policy' hub even for a fixed and limited period of time. For these

reasons, the Agency recommends that, regardless of its findings in regard to 'strategic policy' hubs, the Advisory Group encourage the development of CoPs along fault lines where policy interests overlap but portfolio responsibilities do not. These CoPs should be encouraged to share research resources, frontline knowledge and policy ideas.

Recommendation 6: If the Advisory Group's proposal relating to 'strategic policy' hubs is pursued, steps should be taken to ensure that each agency's internal knowledge transfer around policy development is not diminished.

Recommendation 7: Regardless of its findings in regard to 'strategic policy' hubs, the Advisory Group should encourage the development of public service Communities of Practice (CoPs) along fault lines where policy interests overlap but portfolio responsibilities do not. These CoPs should be encouraged to share research resources, frontline knowledge and policy ideas.

Improving the efficiency of corporate support services for small agencies

The Advisory Group's discussion paper notes that there are around 50 Australian Government agencies employing fewer than 100 staff each. EOWA is one of these and as such has direct experience of a number of different approaches to the management of support services for small agencies, including memoranda of understanding with the portfolio agency, direct procurement of supplies and services, shared services, and a variety of mixes of these.

All of these approaches to support services have limitations associated with:

- the low priority given to organisations that do not have many resources and can offer no economies of scale;
- the difficulties of getting tailored support at a distance from the service provider, especially in information technology;
- the fact that different portfolios or providers will only provide support for certain information technologies, and agencies may be moved between these portfolios or providers through machinery of government changes, thus losing access to database and software upgrades and support;
- problems with access to portfolio legal support, as portfolio departments are slow to build expertise in the legislation relating to small agencies, and such expertise can easily be lost through machinery of government changes or even staff turnover.

A number of these problems can result in additional costs for small agencies already struggling to meet ongoing efficiency dividends.

EOWA notes that an OECD efficiency study involving Australia and due for release by mid-2010 is expected to contain a variety of reform options around shared services. It is not aware of whether the APS has undertaken a census of the support services required by small agencies as part of this study, except to the extent that it has not itself contributed to such a census. Such support services will certainly vary with agency functions and legislative underpinnings, but are likely to include legal advice, information and communication technology support, procurement advice, assistance with the preparation of accountability documentation, recruitment services, travel services, and media support.

The feasibility and desirability of using shared service provision to supply these and other services to small agencies will undoubtedly vary with the location and function of such agencies. Shared service hubs supporting co-located agencies may prove a useful model for many. In addition to providing facilities noted above such as video conferencing and secure faxes, hub accommodation could enable small agencies to share rental, telephone costs and common administrative support costs, and could also provide shared support for recruitment activities, travel, documentation of accountability measures and procurement. It would be important to ensure that the management of these shared services was structured in such a way as to prevent the emergence of a pecking order among service sharers, in which larger agencies are likely to receive priority and often better tailored services.

Recommendation 8: Before taking any measures to increase the efficiency of support services for small agencies, the APS undertake a census of the services that they require.

Recommendation 9: While recognising that different arrangements for support services will suit different agencies, EOWA recommends that the Advisory Group give favourable consideration to shared service hubs supporting agencies located within the same geographical area, or, alternatively, that larger co-located agencies support smaller agencies by making required expensive infrastructure such as video conferencing and secure faxing available for use when needed. In addition to providing these facilities, hub accommodation could enable regional offices and portfolio statutory agencies to share rental, telephone costs and common accounting systems, support for recruitment activities, travel, and procurement, and ministerial and parliamentary support services.

Recommendation 10: The management of any shared services should be structured in such a way as to prevent the emergence of a pecking order among service sharers, in which larger agencies are likely to receive priority and often better tailored services.