

Why do good policy ideas turn into porridge?

A speech by Commonwealth and ACT Ombudsman Allan Asher to the MEAA and Walkley Foundation's 2011 Public Affairs Convention

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Commonwealth

OMBUDSMAN

Every year, my office receives thousands of approaches and complaints about Australian Government agencies – just shy of 39,000 last financial year. This places us in a good position to identify recurring issues in how those agencies are delivering their services, and what some of the underlying causes of those issues might be.

It also puts me in a good position to hold forth on occasions such as this.

One of the key issues my office encounters is the gulf between how a policy is framed and how it is delivered.

I believe that to a great extent this comes down to poor communication, which underlies many of the complaints we receive. This is partly because many agencies see the way they communicate as a side issue to the services they provide, whereas the two are inextricably linked or indeed the same thing.

By poor communication I mean lack of accessibility, poor complaint-handling procedures and language that is unduly complex or bureaucratic. Failures in service delivery are also due to rolling out programs that are too high level and don't involve enough community consultation, as highlighted in a recent opinion piece by Noel Pearson who said:

Politicians and public servants who have never built anything from the ground up in such communities never really get it. Most people in social policy live in a world of programs and plans, bearing scant relation to realities¹.

Ultimately, I believe addressing these problems come down to empathy, to putting yourself in the shoes of the end-user and to working on broad, underlying issues. To making sure that the wellbeing of Australians is your focus, that social inclusion and customer-centred service are your watchwords, not your buzzwords.

Today I will be looking at a series of examples that highlight these problems, in particular executive schemes and Commonwealth-State agreements, where scrutiny, accountability and clear and consistent communication are often lacking. And I will look at ways these problems can be addressed, including a five-point action plan to improve service delivery.

^{1. &#}x27;Social policy begets social misery as the Western world fails the poor', The Weekend Australian, 30-31 July 2011



HOW GOVERNMENTS COMMUNICATE WITH PEOPLE

It is no good having well-designed policies or programs if the very people they are intended for have difficulties accessing them. The outcomes government policies and programs seek to achieve simply won't be realised. Sometimes these barriers are found in the complex and formal language government agencies use to communicate with the public. So we must use much simpler and better targeted language and we must improve communication with those who are not literate.

Some common examples of poor, or even lazy, communication include:

- computer-generated form letters, or letters that cut and paste great tracts of impenetrable legislation, or refer to websites to which their clients may not have access
- sending people too much correspondence, or too little, or none at all
- call centre staff who don't have enough information themselves, or don't have the authority to make proper decisions
- failing to provide key information, such as the right to review, and how to complain
- writing in bureaucratese rather than plain language, using jargon, acronyms and abbreviations
- failing to provide simple explanations for people with cognitive impairment
- taking an officious tone
- not providing translations or interpreters, and
- having no single point of contact, so that people have to repeat their concerns over and over again.

Poor communication is overwhelmingly the main source of complaints to my office from Indigenous people in the Northern Territory. For instance, there is often confusion about how people are affected by government programs, due to insufficient communication, or communication that is too high level, or has been oversimplified to the point of excluding important information, or doesn't explain how government initiatives will affect lives.

A report² my office published in April this year followed a series of complaints about interpreters not being used when they should have been, either because they were not available, or because they were not deemed necessary.

A resident of a remote Indigenous community complained to my office that Northern Territory Government staff and building contractors had not used interpreters when they met with residents to discuss housing plans in that community.

As a result, some residents did not understand the nature of the work that was planned, where they would live while work was being done, and whether they would be re-allocated the same house when the work had been completed.

We raised this with the Department and I'm pleased to say that in response they organised two meetings attended by an Indigenous language interpreter at which the housing program and other housing-related matters were properly explained.

This illustrates that poor communication creates a wall between agencies and the people to whom they provide services. So we must sweep away this obfuscation. Helping governments do this by seeking to change the culture of poor communication is one of the things my office will be looking at over the next three to five years.

^{2.} Talking in Language: Indigenous language interpreters and government communication, April 2011 http://www.ombudsman.gov.au/files/Talking_in_Language-Indigenous_Interpreters_REPORT-05-2011.pdf



SOCIAL INCLUSION

I'd like to talk a little about social inclusion because of the obvious challenges agencies face in not losing touch with those who are, often, most in need of adequate government services. Or not being in touch in the first place.

To illustrate this I will use my own office as an example.

The Australian Government has defined a socially inclusive society as one in which all Australians feel valued and have the opportunity to participate fully³. This means ensuring that people who are currently marginalised become fully engaged – people such as newly arrived immigrants, the elderly, people with disabilities, mental illness or problems with addiction, many Indigenous people as well as whistleblowers, children, the illiterate, those who are impoverished, particularly the homeless, and many others.

Of particular concern are those who are newly socially excluded – for instance, the recently unemployed or homeless, immigration detention centre detainees or newly arrived and vulnerable immigrants – who are less likely to be aware of their opportunities to have a voice.

It is heartening that the phrase 'social inclusion' is cropping up more often in government and public sector discussion, and in initiatives such as the National Compact⁴, which seeks to strengthen relations between Government and the not-for-profit sector. My office is in the process of signing up to the Compact and I very much look forward to us taking part.

Social inclusion, or the lack of it, is a huge issue for my office. Last financial year, we received around 39,000 approaches from people wishing to make a formal complaint about a government department or agency, of which we chose to investigate more than 4,000. However, I suspect that for every complaint we get, there are maybe 10 we don't. In general terms, I believe that the people we don't hear from are the people we should be hearing from most, because they are likely to be those members of our community who are the most marginalised and disadvantaged.

If only 10 per cent of people who <u>should be</u> complaining <u>are</u> complaining, the remaining 90 per cent cannot be said to be fully enfranchised in any meaningful sense. How can we provide accurate feedback and recommendations to agencies, how can the agencies themselves get direct feedback, if we're not hearing from most of the people with real problems?

I suspect there is a range of reasons why these complaints aren't made. A person could be unaware of our existence, or has heard of our office but doesn't realise we take complaints from the public, or knows all this but doesn't think we can do anything. Or perhaps they have cultural or language issues, or concerns about the implications of making a complaint, or certain disabilities such as cognitive impairment.

A recent public awareness survey we conducted showed that less than one-third of people under 35, and a similar number of people who speak a language other than English, have heard of my office. More surprisingly, only 60 per cent of women are aware we exist versus 72 per cent of men.

While my office addresses some of these issues through its outreach and education programs, as well as our broader publicity work, it is clearly our responsibility to find innovative ways to tackle this better. With that in mind, I am keen to raise the profile of my office wherever appropriate, including in social media forums. We are currently using Twitter and very soon we will establish Facebook sites for the Commonwealth and ACT Ombudsman roles. We will also soon start posting material on YouTube.

That such a large proportion of the community is unaware of us, or precisely what we do, points not just to the communication imperatives of my office but highlights a degree of ignorance of the complaint-handling process in general, and indeed the need for it. After all, our survey also found that a substantial number of people under 35 (around 14 per cent) weren't even sure whether they had ever been treated unfairly by a government agency – seven times more than those aged 65 and older.

One of the reasons some people don't make contact with us, or fully engage with other government agencies, is lack of access. This is particularly true of socially marginalised people in remote areas. How do you contact an agency, including my office, if you don't have a landline, or if the local payphone doesn't

4. www.nationalcompact.gov.au

^{3.} A Stronger, Fairer Australia, summary brochure published by the Social Inclusion Unit, Department of the Prime Minister and Cabinet, 2009



work? Perhaps you have a mobile phone, but not enough credit to make calls to 1800 and 1300 numbers, which are only free or charged at a local rate if you're using a landline. That is the irony – it is often the most disadvantaged who do not have landlines but are most in need of 'free' phone services.

I've highlighted my concerns about this issue in discussions with Chris Chapman, Chairman of the Australian Communications and Media Authority. The Authority's own research has found that the number of people without a landline is increasing. Indeed, 14 per cent of the population are mobile-only users⁵. There has also been a decrease in the number of payphones available to the public⁶.

Now, there's online of course, but only around half the population has functional access to the Internet. This digital divide must always be borne in mind when an agency seeks to engage meaningfully with its more marginalised clients. And of course not all agency websites are equally accessible.

It should also be remembered that a website, even an accessible one, is no panacea in itself. Online should complement, not displace, other communication channels.

Communicating with people who are socially excluded is obviously a particular issue for frontline agencies such as Centrelink. It should be said that those of my staff who deal with Centrelink are of the view that it has a culture geared towards improving service delivery to the disadvantaged, and it's encouraging to see that its 10-year service delivery reform plan places a strong emphasis on this. In March this year we accepted an invitation from Centrelink to work with them on the design and review of their new internal review process, and I look forward to this⁷.

EXECUTIVE SCHEMES

Governments are increasingly relying on executive schemes, which I mentioned before as being a form of service delivery where problems often crop up.

By way of definition, an executive scheme is a means for an agency to make discretionary compensation payments or provide government grants under their own power rather than that conferred by legislation. Examples include the School Chaplaincy Program, which I'll talk about in a moment, and the Home Insulation Program as well as the provision of emergency assistance for victims of the 2009 Victorian bushfires.

It's not my intention to declare open season on executive schemes, which certainly have their advantages. Sometimes there is simply no time to get the necessary legislation through Parliament and it is often quite appropriate for agencies to exercise their powers under the Constitution to meet particular needs as they arise.

However, because they are often developed on the run, the implementation of executive schemes is not always fully thought through. There are also issues of public accessibility, consistency of decision-making, lack of accountability, public consultation, Parliamentary scrutiny and effective complaint-handling, all of which are discussed in a report my office issued in August 2009⁸. For instance, decisions made under executive schemes are not subject to review under the Administrative Decisions (Judicial Review) Act, or by administrative tribunals, or to a great extent by the High Court or Federal Court. Only my office can review such decisions, though, as with any other administrative decision, we do not have the power to overturn them.

The complaints made to my office about executive schemes tend to fall into the following categories:

- a lack of comprehensive, accurate and up-to-date information to potential claimants (such as inadequate guidelines, or none at all)
- criteria not properly thought through
- inadequate liaison with other organisations resulting in inconsistent advice
- poor decision-making practices
- lack of effective review of decisions.

^{5.} ACMA, 2009-2010 Communications Report 2 - Take-up and use of voice services by Australian Consumers, pp 4, 14, 22

^{6.} Ibid, p77

^{7.} Centrelink: Right to Review - having choices, making choices, March 2011 - http://www.ombudsman.gov.au/files/centrelink_the_right_of_review_having_choices_making_choices.pdf

^{8.} Executive Schemes – August 2009 – http://www.ombudsman.gov.au/files/investigation_2009_12.pdf



Three of these categories relate to issues of communication either between agencies or between agencies and the public in both directions. The public needs to be fully and consistently informed as much as possible given time constraints, and people affected by the scheme need to be able have decisions reviewed in a meaningful way. In addition, the complaints they make need to be taken seriously and where appropriate result in changes to the way the service is delivered.

NATIONAL SCHOOL CHAPLAINCY PROGRAM

In July, my office published a report⁹ on our investigation into the Department of Education, Employment and Workplace Relations's administration of the School Chaplaincy Program, which is an executive scheme as well as an inter-government agreement (although State governments have kept it at arm's length). In my report, I noted the lack of precision in the way the Department runs this admittedly complex program and the need to improve its management and oversight.

In the report I expressed the view that the Department should be clear about how it expects schools to consult with the community. It needs to provide more and better guidance about the minimum standard expected of schools when gauging community support.

The report highlights one case in which a woman complained to us that the staff at her child's school made only a token attempt to consult with parents and that those who were consulted rejected the proposal to appoint a chaplain. The school went ahead and appointed the chaplain anyway.

We also found that there is a degree of informality about the current complaints mechanisms. A lot of people aren't even aware that they can complain, and when they do, their complaints often don't find their way from the schools or State or Territory authorities to the Department.

So among my recommendations were that the Department should:

- consider giving guidance to schools and education authorities on how best to obtain parental consent for participation in the program
- review the code of conduct to provide clarity on what actions could be considered to be in breach of the requirement that chaplains not proselytise, and to clarify this with the public
- amend the program guidelines to define the terms 'chaplain' and 'pastoral care', and mandate a minimum qualification for the position of chaplain
- implement more robust mechanisms to capture and manage complaints
- work towards a review of funding agreements to ensure: consistency; that all key participants are accountable; and that the protection of children and parental rights is central to the administration of the program.

INTER-GOVERNMENT AGREEMENTS

The problems arising from the Chaplaincy Program are common to many inter-government agreements where lines of accountability, review and complaint handling are not clearly defined.

The challenge for governments in this area is to ensure that appropriate governance and accountability measures are in place to complement the greater collaboration, flexibility and innovation that are among the benefits of inter-government agreements. Governments need to be jointly held to account for outcomes that National Funding Agreements seek to achieve. It is not sufficient for the Australian Government to provide the funds and leave it to the state and territory governments to deliver the programs.

In our experience, through the investigation of complaints by Indigenous Australians, people are often confused about how to seek resolution of a housing matter, challenge a decision or request information about the various Indigenous and other housing programs. There is often a lack of clarity about which agency or tier of government has the responsibility to resolve their issue – such as getting urgent repairs, certainty about rent or access to new housing. The onus should <u>not</u> be on members of the public to know the specific agencies responsible for each component of these programs in order to seek redress or to complain. In

^{9.} Department of Education, Employment and Workplace Relations: Administration of the School Chaplaincy Program, July 2011 – http://www.ombudsman.gov.au/files/commonwealth_ombudsman_chaplaincy_report_06_11.pdf



such circumstances providing a one-stop-shop for people to complain, have matters investigated and issues resolved is important. The NT Department of Housing, Local Government and Regional Services is presently developing a more integrated housing complaints and review process that enables Indigenous people to seek redress of housing matters without having to know the level of government or agency that has prime responsibility. This is a positive development which could form the model for other areas covered by National Partnership Agreements.

One important measure of accountability is the existence of effective independent oversight, and complaints and review mechanisms. Supporting and properly resourcing strong, efficient and independent oversight agencies such as my office and that of the Auditor-General is a critical component of an accountable and transparent governance framework.

I suggest that National Partnership Agreements and National Funding Agreements should clearly set out appropriate governance arrangements to enable reporting on outcomes, and comprehensive and accessible review and complaints mechanisms to enable the public to seek redress of issues.

Consideration should also be given to expanding the independent oversight of programs delivered under Australian government funded programs. This includes expanding the jurisdiction of my office to enable it to investigate complaints relating to such programs and where administrative action may cut across the three tiers of government.

NORTHERN TERRITORY EMERGENCY RESPONSE

One obvious example of an inter-government agreement that has encountered problems is the Northern Territory Emergency Response.

In December 2009 we published a report¹⁰ on how the Department of Families, Housing, Community Services and Indigenous Affairs communicated the results of its asbestos surveys of housing in remote Indigenous communities.

The initial surveys took place from November 2007 across all 73 communities. That asbestos was present in many houses became clear from January 2008 but an organised, deliberate communications strategy was not introduced until August the following year. This strategy would have kept people informed of the process and when results would be available, while providing an avenue to make enquiries and raise concerns. It was our view that the longer people were left without specific information about the asbestos in their homes, the greater the risk of them disturbing it. Quite apart from the fact that they had a right to know.

Communication issues have been at the core of many complaints made to my office about the Emergency Response and other Indigenous programs in the Northern Territory. The Emergency Response is particularly noteworthy because it involves so many government agencies and so many different levels of government.

Common elements in these complaints include:

- not articulating clearly to intermediaries the expectation that they will inform all members of a community
- information being conveyed solely in one-off sessions and meetings
- different approaches by intermediaries to providing information, leading to varying degrees of understanding and awareness across the communities
- crucial written material not being translated into the appropriate language(s)
- failure to use interpreters
- a limited understanding of cross-cultural communication issues
- key messages and important information being delivered in one format or via one method only
- passive communication of important information, for example, only conveying information on the internet.

^{10.} NTER – Department of Families, Housing, Community Services and Indigenous Affairs asbestos surveys: communications issues, December 2009.



In fairness, I acknowledge connecting with the Indigenous community poses a unique set of challenges. Prior to the introduction of my office's Indigenous outreach program, virtually no Indigenous people complained to us – as far as we are aware – and it hardly needs saying that this is not because they had little about which to complain.

A report¹¹ based on research my office commissioned late last year revealed that Indigenous people are unlikely to complain because:

- they do not know it is possible or acceptable to complain, or who to complain to
- they believe they must accept their lot in life
- they fear reprisals
- they dislike confrontation
- there are language issues
- complaining brings with it a sense of shame
- they have poor self-esteem
- they believe that complaining in itself won't change anything.

The research also found that many Indigenous people prefer to use an intermediary whom they know to discuss problems or issues, preferably face-to-face in a familiar location, and only after they have come to trust the impartiality and effectiveness of the complaint-handling process.

That is presumably why our outreach teams are effective in gathering complaints from Indigenous people. And it is perhaps telling that we have occasionally drawn criticism from some within the Public Service for using such methods to supposedly 'drum up' business.

In response to the research, we are preparing a report called *Lessons learnt from our engagement with Indigenous communities* and working on new Indigenous communications resources.

HOME INSULATION PROGRAM

Another example of a problematic inter-government agreement and executive scheme is the Home Insulation Program implemented by the then Department of Environment, Water, Heritage and the Arts in 2009 and 2010.

The Hawke Review¹² into the Program pinpointed a number of problems with the Program, a number of them springing from the haste with which it was developed and poor communication among the Department and the various State and Territory agencies it had dealings with.

The Review claimed that States and territories reported to it that they had minimal input during development and implementation of the Program, particularly once the decision on the business model was taken. They would have preferred more engagement and a better flow of information to them about the Program, including information on action taken on complaints or other issues that impacted on state responsibilities¹³.

The Department put in place memoranda of understanding (or similar) with state and territory consumer affairs agencies to cover information sharing about complaints, but some states reported that there was often no information flow back to the state from the Department about what action had been taken or the results obtained from audits¹⁴.

^{11.} Improving the services of the Commonwealth Ombudsman to Australia's Indigenous peoples, prepared by Winangali Indigenous Communications and Research, November 2010

^{12.} Review of the Administration of the Home Insulation Program, by Allan Hawke AC, 6 April 2010

^{13.} Ibid, page 17

^{14.} Ibid, pages 18-19



SOLUTIONS

I now want to focus on ways the issues I've raised today can be addressed.

Stakeholder engagement

First, without genuine stakeholder engagement, it is a mistake to think that you know what impact your policies and actions will have on people. When we do engage, sometimes the reality of what people think we should be doing or prioritising can be a bit of a shock. There are real benefits in consulting with a wide audience on organisational work plans. As well as market testing messages to make sure they are clear, effective and accessible, particularly when it comes to Indigenous audiences.

In addition:

Tell people what's going on. The Information Age has brought with it demands to be more open about organisational decisions and policies and to be more careful about how information about individuals is handled and shared. It is vital to keep abreast of these changes and meet new legal obligations.

Think creatively about how to disseminate and collect information. Online services provide great scope for people to access information about programs and to transact with government. Though again it's worth keeping in mind issues of accessibility. Being innovative with technology to which your target audience doesn't necessarily have access is obviously counter-productive.

The work being done as part of Government 2.0 is very encouraging, and it will be interesting to see the extent to which public sector culture shifts towards using technology as a means of creating more open government.

Customer-centred service

Second, of particular importance to any agency aiming to focus better on the needs of people is Ahead of the Game: *Blueprint for the Reform of Australian Government Administration*¹⁵, which can be summed up as: talk to the people in ways they understand and communicate between themselves, get their views and feed them back into better performance.

Among the recommendations of *Ahead of the Game* are that service delivery be simplified to make access to government services more convenient through automation, integration and better information sharing. Over time, this would lead to:

- a 'tell us once' approach
- a service delivery portal that guides citizens through interaction with government, and
- physical locations where citizens can access multiple services.

This would be grounded in a view of policy and service delivery that places the interests of citizens first.

Complaint-handling

Third, people need to be given clear pathways and opportunities to seek review of a government decision, action or inaction. This should include clarity about how people can seek redress through a comprehensive and accessible complaints mechanism that enables them to have their matter effectively investigated and dealt with.

Agencies that have good complaint-handling systems are doing themselves a favour. Not only do they have the opportunity to clarify or resolve a matter for their customer – thereby making them happier – but complaints are a valuable source of intelligence on how effectively the agency is performing. They also provide an opportunity to learn from any mistakes made and improve systems.

A healthy bureaucracy welcomes all this input and smart administrators recognise its value.

^{15.} Improving the services of the Commonwealth Ombudsman to Australia's Indigenous peoples, prepared by Winangali Indigenous Communications and Research, November 2010



One way in which agencies can make this happen is to shift their attitude towards complaints themselves. Many within the private sector still view their complaints areas as punishment details for errant executives rather than a strategic resource. Increasingly, the result of this approach is that these businesses are the first to go <u>out</u> of business. There's no such inducement for senior officers in the public sector, but perhaps there ought to be.

In addition, one way an agency can measure the effectiveness of its service delivery is fewer complaints to agencies, and fewer complaints to my office.

PLAIN LANGUAGE

William Tyndale was the 16th century English scholar who translated the Bible from Greek and Hebrew into English for a public readership. He also took advantage of cutting-edge technology, namely the printing press, to increase the readership as much as possible. Remember that at this time clergymen were in the habit of reading the Bible to themselves during services, tinkling a bell now and then so the congregation would know when they'd come to an especially edifying bit. This is I suppose the very definition of lack of access.

It is perhaps not surprising then that, Church authorities, fearful of becoming obsolete, burnt Tyndale at the stake.

So in a way he was a martyr to plain language. Though he enjoys a degree of immortality in the King James Bible, which was introduced about 80 years after his death and was largely based on his translation.

I've had productive talks with a latter-day crusader for plain language – Dr Neil James, Executive Director of the Plain English Foundation in Sydney. The Foundation recently conducted a survey¹⁶ looking at what motivates public sector agencies to adopt plain language and what factors lead to success or failure.

The results were interesting. For instance, external criticism had little effect on whether an agency took up plain language. The main reason they did was that a similar agency had done so, or an internal review or senior staff member championed the idea. Worth noting if you're keen to see a plain language program rolled out in your agency.

The benefits of plain language to all concerned are clear. The time and money saved from the agency's point of view, and the improved accessibility for users, can be significant. It is curious too how plain language can affect attitudes. One respondent in the survey wrote: "I now see the clients I write to as real people when I prepare a document."

According to a briefing paper prepared for the NSW Premier in 2009, NSW agencies that adopted plain English enjoyed the following benefits:

- a reduction in drafting time of roughly half
- a reduction in management editing time of around 40 per cent
- an increase in client satisfaction to a 92 per cent rating.

International case studies also reveal startling savings. For instance, the US Navy has saved \$350 million by moving to plain English memos.

Introducing a plain language program is one obvious way an organisation can begin attending to its communication issues, and illustrates in a broader sense the whole idea of wellbeing and how to evaluate it. Many government agencies introduce such programs, but only 40 per cent reach completion and therefore have a lasting effect.

One of the problems routinely encountered by plain language programs are:

- management not supporting or participating in the program
- templates and systems that are inconsistent with the new approach

^{16.} Reported in 'Persuading the public sector to invest in plain language' - Industry seminar for Clarity 2010 Lisbon



- individual staff or departments opposing change
- the underlying culture of the organisation.

A project I have been interested in for some time is a long-term, Government-wide plain language program. I am in discussion with the Plain English Foundation on what measures might be required to make this happen, and I have written to the Prime Minister suggesting we meet to discuss the plan. Such a program would have to involve the creation of clear standards, strong and consistent support from the Prime Minister down, an effective training and auditing program, and even legislation.

It would help change the public sector culture from one in which agencies see communication as a side issue to the services they provide, to one that recognises that good communication is integral to good service delivery.

The issues I've raised this morning are not intractable. And some of them will be the subject of further discussion at the Commonwealth Ombudsman National Conference on 8–9 November. The key themes of the conference are:

- delivering customer-centred services
- innovation for good governance and public sector integrity
- the tough task of improving social inclusion.

I would encourage anyone interested in these issues to register as soon as possible via the Commonwealth Ombudsman website.

Meanwhile, here are five ways agencies, and government as a whole, can begin to improve the services they deliver:

- 1. Support a Government-wide plain language initiative
- 2. Take active steps to reach socially excluded stakeholders
- 3. Consult with key stakeholder groups before implementation, not afterwards
- 4. Support better scrutiny of executive schemes. This might be from other sections of an agency or even an inter-departmental review committee that randomly selects and reports on half a dozen schemes a year.
- 5. Build in better complaint-handling and accountability mechanisms into inter-government agreements.

For any agency, improving service delivery means going back to first principles and asking: are we placing the needs and wellbeing of the Australian community first, and if so does our service delivery reflect this? Are we giving the way we communicate our policies the same attention as the policies themselves?

Thank you.