

## Submissions

Your formal advice to Ministers, or requests for approvals and authorisations, will be contained in a written submission. Emails, PowerPoint presentations and conversations are excellent ways of taking discussions forward but they should never be used for important decisions.

Each department has its own preferred submission structure, but a very good one, used by a number of departments, is: *Issue, Recommendation, Timing, Background, Argument, Presentation*. If the issue is a simple one, you can condense the issue, recommendation and timing into one paragraph, but the other items should always be kept separate, even if each is quite short.

The advantage of this structure is that it brings the Recommendations and Timing sections to the early attention of the Minister, so that they can be borne in mind whilst the rest of the submission is being digested, or even ignored if the recommendation is clearly attractive (or unavoidable). But some Ministers prefer always to read the supporting detail, and their wishes should be respected, even if the result is that they ask that their submissions are structured in a different way. It is vital that Ministers should be given the facts and arguments that they believe necessary so that they can take good decisions in which they have real confidence.

Before starting to draft, consider carefully whether you are seeking to formulate policy; or helping promote, defend or implement it. The tone, substance and length of your submission will be greatly affected by this decision. It can then be helpful to prepare a first draft of the submission in the following order:

- P** *Presentation*: First, you should if possible draft the press notice which will communicate the decision that you are recommending. It may be too soon to show your draft to a Minister but, if the draft comes easily, then the rest of the submission will probably flow quite naturally. On the other hand, policies that are hard to understand, and hard to defend, are often flawed. Deal also with other presentational issues, such as the method of any announcement, media handling, and so on.
- P** *The Issue*: a brief statement of the problem or the decision that needs to be taken.
- P** *Background*: provide sufficient facts and a summary of the story so far, including a rehearsal of previous Ministerial decisions and correspondence. If referring to documents, summarise or attach them. But consider how much the Minister already knows or will remember, for it is often possible to reduce the background to a couple of sentences.
- P** *Argument*: the considerations, based on the (above) background, which lead you to clearly identified conclusions and recommendations. Summarise all the

reasonably possible options and deal (perhaps briefly) with the merits and demerits of each one.

**P** *Recommendations:* Now summarise your conclusions and recommendations, cross-referenced to the appropriate paragraphs of the argument section. If possible, you should phrase your advice so that the Minister can just say 'yes' or 'no'. Do not merely recommend a discussion with officials. It is important that you should recommend a specific course of action or decision, taking into account Ministers' declared policies and political agenda. If Ministers accept your recommendation then you have saved yourself and them a meeting. If not, any discussion will be assisted by the Minister having a firm recommendation to discuss and test.

**P** *Timing:* a note of the time scale within which the decision needs to be taken, with an explanation if there is a need for urgency.

The final draft can then if necessary be re-ordered to bring the Recommendations and Timing sections up front. It can also be shortened! Because Ministers are under constant pressure, you should be as succinct as possible. If you really cannot bear to cut stuff out, then at least consider putting it in an annex. It may never get read but it might make you feel better.

Incidentally, try not to take yourself or your advice too seriously. You may well analyse a problem in great depth and craft an elegant submission which convinces you and everyone around you of the merits of your recommendation. But issues are seldom really black and white, and the world will not come to an end if the Minister disagrees with you. And even if your advice is not accepted, its preparation will certainly not have been a waste of time, for it will have prepared the Minister for attacks from any commentators and political opponents who independently come up with the same conclusion as you.