



Australian Government
Department of Immigration and Citizenship

Address on
‘Designing public policy and programmes:
Case study in compliance and detention reforms’

The Australian and New Zealand School of Government

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Embargoed until 8.45am, 15 June 2007

Introduction

Today, I would like to present some thoughts about designing public policies and programmes, in line with the topic you are currently pursuing here at ANZSOG. I will then give as a case study the work we have undertaken in the Department of Immigration and Citizenship over the past two years to redesign our detention and compliance programmes.

Designing effective public policies and programmes

The design of public policies and programmes is one of the great challenges we face in the public sector.

The first point I want to make is that excellence in design will invariably shine through any other considerations in terms of getting policies and programmes adopted. The executive level of government is always hungry for policies and programmes that achieve beneficial outcomes at reasonable cost. It’s the job of the Commonwealth and State and Territory public services to offer a range of innovative and viable options, but we do so under close external scrutiny and in an environment where policy is contestable. To succeed, we must demonstrate our passion for policy — that is, capitalise on our policy expertise to develop the programmes governments require.

One of the barriers to innovation in policy development is that it costs real money and resources to try out your ideas. So it’s not surprising that those who might feel the backlash of a poor policy may be risk averse when it comes to trying something new. And we should never forget that a poor policy is not just a cost to resources, but is likely to have negative impacts on the people it is intended to benefit.

I think this hunger for good programmes and the restraints on creative policy-making are demonstrated by the great amount of borrowing that goes on. If one jurisdiction around the world is showing successful outcomes from a specific policy then you will often see the ripples flow around the globe as other countries adapt the central idea to their own needs. There are hundreds of examples – everything from tariff reductions to business process re-engineering and using the internet to conduct government transactions.

Since the first Swedish Parliamentary Ombudsman was appointed in 1809, we have seen the concept spread so that just here in Australia, we have a Commonwealth Ombudsman, Telecommunications Industry Ombudsman, and Banking and Financial Services Ombudsman, among many others, such as at the state level.

And just recently the United Kingdom Immigration Minister Liam Byrne announced the adoption of the Australian points-based system for managing skilled migration flows based on the system administered by my department.

By highlighting the strong interest in borrowing policy and programme successes, I don't mean to make it sound as though the Australian public sector is anything other than a hotbed of creative ferment! And one of the ways we can manage the risks around courageous policy-making is to establish pilot programmes that are of modest cost, and which if successful can be rolled out to a broader client base.

I would just comment that our success in innovative policy-making depends on our ability to attract people to senior leadership positions who have very strong conceptual skills and can apply a degree of intuition in assessing the merits of new ideas, but can then also construct and advance the case for those ideas worth pursuing. One challenge is to nurture and value these conceptual skills as people progress to the senior leadership positions.

A week in the life of DIAC

To give you the context for my address today it's necessary to grasp the scale of the operations of my department.

My department currently has around 7000 staff, dispersed globally across 80 offices.

Recognising that we provide services at the borders and in other areas on a 24-hour a day basis, during a typical week, we will:

- receive more than 30 000 phone calls through our contact centres,
- grant nearly 3000 visas for permanent stay in Australia, and
- grant citizenship to nearly 2000 people.

We also process something in the order of one person per second across Australia's borders.

The size of our detention operation is indicated by the 470 people in immigration detention as at 18 May 2007. These people were accommodated in immigration detention centres, immigration residential housing, community detention and other alternative detention in the community such as private apartments, motels and private houses.

To conclude on the size and contribution of our operations, I need to mention that over a period of 62 years, the department has managed the visa approvals and settlement of nearly 7 million people. This is equivalent to more than 2000 migrants arriving every week for each of those 62 years. Without this work, Australian society would be very different, given around 25 per cent of us have been born in another country and a further 18 per cent or so are children of people born elsewhere. There is a huge economic, social and cultural contribution from the migrants whose arrival we have facilitated and supported.

The continued contribution of the programme was recently acknowledged in a speech by my colleague, the Secretary of the Treasury, Dr Ken Henry AC, that the effects on the economy of the ageing of the Australian population would be significantly offset by immigration levels.

Compliance and detention – the purpose and principles

Today, I want to give as a case study, the reforms we have made to our detention and compliance programmes over the past two years in the Department of Immigration and Citizenship.

I need to mention that compliance has a special meaning within our organisation to include the actions we take to ensure the integrity of our visa and citizenship programmes. This includes ensuring that people are aware of their rights as well as their obligations and much work in prevention and deterrence, with the last resort being enforcement. The enforcement role includes the identification of people overstaying their visa, cancellations of visas, investigations, locating people — such as those who are suspected of overstaying their visa — prosecutions, detention and removals or deportation.

I also need to explain the powers we have to detain people.

Australia's immigration detention policy as we currently know it was introduced in 1992 and expanded in 1994, but provision for detaining illegal immigrants effectively dates back to the *Immigration Restriction Act 1901*.

The *Migration Act 1958* requires that all non-citizens who are unlawfully in mainland Australia must be detained and that, unless they are granted permission to remain in Australia, their removal be effected as soon as reasonably practicable. The Act also provides that unauthorised arrivals at an excised offshore place may be taken into detention.

Overall, there are four kinds of unlawful non-citizens who may be detained under the Act: persons whose visas have expired, persons whose visas have been cancelled, persons who have entered Australia by boat or by air illegally, and persons whose visas have ceased by operation of migration law.

What is not always clearly understood is that the power of detention is not punitive in nature. In the words of the High Court, the power to detain is available so that the appropriate exercise of executive powers can be made in terms of excluding and removing people who are unlawfully in Australia, and investigating, considering and determining applications for permission to enter Australia.¹

In other words, people are held while their legal status is resolved, and so that once their legal status is resolved, the appropriate action can be carried out, whether that is release into the community, through provision of a visa, or possibly removal from Australia.

We can summarise this by looking at the policy purpose of immigration detention. This is to ensure that non-citizens who arrive unlawfully:

- do not enter the Australian community until their identity and status have been properly assessed and, if eligible, they have been granted a visa
- are available during processing of any visa applications and, if applications are unsuccessful, are available for removal from Australia
- are immediately available for health checks, which are a requirement for granting a visa
- are provided with access to appropriate services, such as health or counselling, if they are required.

In these ways, immigration detention plays a significant role in maintaining the integrity of Australia's migration programme.

¹ *Al-Kateb v Godwin* [2004] High Court of Australia 37 (6 August 2004)

The Palmer and Comrie reports and our response

Now let's wind the clock back to the middle of 2005.

I expect everyone here will be aware of the release of the Palmer and Comrie reports in 2005, followed by a number of subsequent reports on cases involving immigration detention matters by the Ombudsman.² Close to 250 individual cases were identified where people had been released from detention in the years leading up to 2005 on the basis the person was found to be 'not unlawful'.

These Palmer and Comrie reports set out in detail the clear and substantial mistakes which were made in the detention of Cornelia Rau and the removal from Australia of Vivian Alvarez.

I will note that my predecessor and I have apologised fully and frankly for these grave errors and the government has made, or will make, other reparations to those affected.

Mr Palmer noted in his report that:

'There is a serious cultural problem within DIMIA's immigration compliance and detention areas: urgent reform is necessary. The combination of pressure in these areas and the framework in which DIMIA has been required to operate has given rise to a culture that is overly self-protective and defensive, a culture largely unwilling to challenge organisational norms or to engage in genuine self-criticism or analysis.

DIMIA officers are authorised to exercise exceptional, even extraordinary powers. That they should be permitted and expected to do so without adequate training, without proper management and oversight, with poor information systems, and with no genuine quality assurance and constraints on the exercise of these powers is of concern.'

There was also more detailed criticism in the Palmer and Comrie reports of specific problems in the operational procedures and other arrangements for the immigration detention and compliance programmes.

Mr Palmer noted that the 'current detention services contract with Global Solutions Limited is fundamentally flawed and does not permit delivery of the immigration detention policy outcomes expected by the government, detainees and the Australian people'.

He was also highly critical of the infrastructure at the Baxter detention centre in South Australia and the management of client information.

In the report, Mr Palmer recognised that there were very heavy workloads and pressures in these areas and I want to give a little background to this.

The department had been operating at a high tempo for some years prior to these reports. And there were a number of significant external shocks and unexpected events, which diverted the resources and attention of senior managers and effectively put the organisation into crisis mode.

² Inquiry into the Circumstances of the Immigration Detention of Cornelia Rau, Mr Mick Palmer AO APM, July 2005.

Inquiry into the Circumstances of the Vivian Alvarez Matter, Report by the Commonwealth Ombudsman, of an inquiry undertaken by Mr Neil Comrie AO APM, September 2005

For instance, there were substantial operations such as the evacuation of the Kosovars, and the ongoing issues around East Timor including the successful processing of the people given safe haven. Then there was the complex work around unauthorised arrivals and detention which culminated in the arrival of the Tampa in 2001, but then continued into the development of the offshore processing strategy.

There were also some very high profile cases, and intricate and sensitive issues such as verification of identity.

At the same time, the 'business as usual' scenario included major programmes such as the introduction of electronic visa processing and steadily increasing migration numbers.

We also need to recognise that there were many areas of administration in which the department was performing well and indeed, was a world leader in some instances. These included our settlement programmes, including the settlement of humanitarian and refugee entrants, our border technology systems such as the electronic visa and the Advanced Passenger Processing systems, and our broader planned migration and humanitarian programmes.

On my appointment as secretary in July 2005, I recognised that to move forward, we needed to find a balance by building on these many successes while addressing the issues that needed urgent attention and recognising the stress that staff had been under.

One of my first tasks was to ensure that our extraordinary powers of detention, removal from Australia and our other compliance powers were exercised, lawfully, fairly and reasonably. It was then necessary to design new programmes for our compliance and detention activities. However, this design work needed to be undertaken in a much broader context.

As well as the specific cultural problem and the serious administrative errors highlighted in the Palmer and Comrie reports, they also flagged the need for much wider changes in the department's culture and business.

For instance, they noted the "process rich, outcomes poor" nature of aspects of our operations.

More broadly, the Palmer and Comrie reports focused on leadership, governance, training, systems support, the relationship between policy development and implementation, client service delivery and records management.

In fact, the Palmer and Comrie reports and the subsequent reports by the Ombudsman have provided the catalyst for very substantial business and cultural change in the department. (I should just note that each of the cases reported by the Ombudsman receives a comprehensive response from the department in terms of possible reparation to those affected and improvements to our procedures and systems. In a few weeks we are expecting the final reports from the Ombudsman, on the cases referred to him in 2005.)

Once the issues had been outlined in the Palmer and Comrie reports, it was our job in the department to develop the overarching framework and specific programmes for our business and cultural change.

The first year of our reform and improvement programme saw the design and introduction of programmes to address client service, compliance, case management, training through the College of Immigration, an overhaul of our detention centres, improved health services for people in immigration detention and identity verification.

The department also introduced new approaches and programmes in supporting areas such as governance, stakeholder engagement, quality assurance, risk management, accountability, the application of consistent values and ethical decision-making.

We introduced the three strategic themes by which all our work is now undertaken:

- being an open and accountable organisation
- ensuring fair and reasonable dealings with clients
- having well-trained and supported staff.

Overall, we are two years along in one of the largest change programmes undertaken in the Australian public sector. We have achieved a great deal. But I want to emphasise that there is much more to do.

One of the positive aspects has been the unusual opportunity we have had to implement a new culture and approaches which I believe will put us ahead in some key ways of many organisations who have not had this imperative to undertake radical change.

Cultural change – promoting a consistent set of values

Before I talk about the design of our compliance and detention programmes, I should mention the nature and extent of the cultural change required.

At the time of the Palmer report, there were a range of feelings and views across the organisation about what change was necessary, who should change and the extent of the change required.

It was clear to me that if we were to move forward, the whole organisation needed to adopt a new culture. We had to recognise the expertise of the many people who continued on in the department while developing new approaches that could provide guidance for every aspect of our work.

Also, many of the roles in the compliance and detention functions are very personally and emotionally demanding, especially where clients exhibit difficult or confronting behaviour. For anyone who has watched the programme ‘Border Security’ on television recently, this provides a glimpse into the difficulty of this work. One of my top priorities has been to support staff who have been personally affected by their work.

Where perhaps we had gone wrong in the past, was not to realise that unless we define and constantly reinforce appropriate behaviour and values for our staff, there is the possibility that staff will develop their own value set based around the very difficult work they do.

So since the Palmer report, we have worked very carefully to clearly communicate the appropriate behaviours and values for the organisation as a whole.

As I am sure you will all be aware, every Australian Government public servant is expected to apply the Australian Public Service Values and the APS Code of Conduct in their work.

As part of working within the APS values, we expanded these to provide a DIAC-specific focus to reflect the nature of our work and where we are at in our cultural transition.

This expansion resulted in us focusing on:

- teamwork
- service excellence
- respect
- openness, and
- commitment.

We communicate and provide training across the organisation in these values to ensure we are working ethically, appropriately and in line with public sector and community expectations.

The strategic themes I mentioned previously and our DIAC values provide layered guidance so that every staff member is aware of expected behaviours. We set out these high-level concepts in our annual DIAC Plan which forms the high-level guidance from which smaller work units can formulate their own plans and specific cultural values, such as if they provide services directly to clients, or work with especially vulnerable people.

The other issue around culture which we are addressing is not unique to DIAC, and that is leadership. The Australian Public Service Commission is driving a number of initiatives to improve leadership across the Commonwealth public sector. Mick Palmer identified leadership in the department as an issue and we have initiated a good deal of work on this. Time doesn't allow me to go into detail here but I will mention the leadership behaviours we require in DIAC.

These are to:

- provide vision and meaningful direction
- operate consistently with our values
- communicate constantly and meaningfully
- create the environment for success
- function as team players
- persist to achieve good outcomes.

These capabilities and behaviours now underpin all our work and initiatives on leadership.

We have also instituted a management and leadership decision-making tool called IDEAL. This stands for Immigration Dilemmas, Ethics, APS Values and Leadership and encourages workplace teams to explore a variety of ethical and other dilemmas through a range of scenarios.

The response in compliance and detention

The specific challenge we faced in mid 2005 was to build a new approach to immigration detention and compliance in which our powers would be exercised lawfully, fairly and reasonably. The change required was comprehensive, meaning that we would go back to first principles in designing our new programmes, but we could also put into practice our best ideas in terms of strengthening arrangements for governance, accountability, risk management and ethical decision-making.

One of my first actions in mid 2005 was to restructure the compliance and detention divisions to improve the management oversight of these crucial functions. New division heads, from outside the department, were recruited to lead this change.

Managers and staff in the new divisions canvassed widely regarding possible reforms, with a view to creating the best possible environment for people in immigration detention and to improve our operational and strategic capabilities.

It was obviously a priority to respond to the specific recommendations on immigration detention and compliance in the Palmer report. These have been fully addressed, with our new programme arguably going beyond the expectations set down in these reports.

The significant advances over the past two years include the development of nine Core Operating Principles to provide guidance on the management of immigration detention facilities. These are directed at ensuring people are provided with timely access to quality accommodation, health services, food and other necessary services.

The College of Immigration was established to provide training for individuals in key roles including compliance and detention officers.

The first course offered through the college, the Compliance Officer Pilot Course was completed in September 2006. The first phase of the detention officer pilot course has also been conducted and this programme is now conducted on a regular basis. The first college pilot of our investigations course commenced a few months ago.

Design work has commenced on college programmes for airport staff, and a new comprehensive training programme will be implemented in the new financial year.

We developed a new Onshore Compliance Strategic Plan, which sets out clear risk-based areas of focus for operational compliance activities and establishes a balance between prevention, deterrence, and enforcement activities. We are expanding the plan to cover all aspects of the onshore compliance programme.

We have reviewed our longer-term detention requirements and have started implementing a new, more cost-effective Onshore Detention Strategy. This strategy provides for a range of placement options for people who are detained. It moves away from the previous 'one size fits all' approach where being in immigration detention was synonymous with placement in a detention centre.

As a result of the strategy, being detained can mean:

- a family living in a house in the community with no visible signs of security
- an overstayer in an Immigration Transit Accommodation Centre, run like a youth hostel
- an asylum seeker regarded as a low security risk living in a house in our Residential Housing cluster, or
- a higher security risk person in a traditional detention centre.

The key point is that the way people are detained now reflects their status under the Migration Act, as set down by the Australian Parliament.

The onshore detention strategy will meet the expected demand for these services for the next 10 years, based on flexible arrangements, including accommodation and other services. There are clear savings to government as additional centres will not need to be built.

And in line with our duty of care obligations, we are improving our detention accommodation and services. We have made upgrades to immigration detention centres that include improved areas for sport and recreation, upgraded facilities for visitors, the removal of razor wire, and better health services.

I must mention here the important work and involvement of our stakeholders in our immigration detention reforms.

As I indicated earlier, our immigration detention and compliance staff have some extraordinary delegated powers, including to deprive people of their liberty. It's not surprising that the people who are the subject of these life-changing decisions, often seek the support of friends, relatives, lawyers, migration agents and community groups. Those detained are understandably keen to obtain their liberty, or at the least, resolve their status and make sure they are treated appropriately while detained.

For a number of years, we didn't always recognise the benefits of working positively with these stakeholders, and sometimes tended to argue issues through the media rather than engage constructively with them.

One of our key strategic reforms has been to devote senior-level resources to implementing a specific stakeholder engagement strategy, with a view to building stakeholder and community confidence in our work.

For instance, we have been working constructively with the Immigration Detention Advisory Group. This key group was appointed in 2001, and provides advice to the minister on the appropriateness and adequacy of services, accommodation and amenities at immigration detention facilities.

It has been an integral part of shaping our changes, along with the Detention Health Advisory Group.

The DeHAG, as it is known, was convened in March 2006 and includes a number of eminent people from the health sector. This group has recommended and advised on significant health reforms, including the development of detention health standards prepared by the Royal Australian College of General Practice, the development of a detention health data set and a review of the mental health policy and procedures.

A major task of our Detention Health Branch has been to define a Detention Health Strategy and Framework to articulate the full range, level and standard of health and mental health care to be provided to people in immigration detention in all situations. The high level strategy was finalised and endorsed in May 2006. The DeHAG is now assisting the department to finalise a more detailed document to support the implementation of the Detention Health Strategy to be known as the Detention Health Framework.

The department is in the process of re-tendering for detention services and health care services. Recognising these tenders are now open, I need to be careful in what I say, but I would like to make clear that we are not simply re-tendering for the same services. An immense amount of work within the department, informed by significant consultation with a wide range of stakeholders, has resulted in the development of a new service delivery model.

This service delivery model incorporates inputs from many different sources to ensure that those tendering for detention services and health care are aware of their obligations when exercising their duty of care to all clients in detention. The service delivery model is based on the three themes which I outlined earlier.

In preparation for the tenders, the department asked the Australian National Audit Office to undertake a performance audit of the governance arrangements for the re-tendering process. The Audit Office released its report in May, providing the department with assurance that the framework for this strategic procurement activity is sound. We have agreed with the two recommendations made in the report associated with project management, budget processing and records management, and have taken steps to address these.

In June 2005, the Prime Minister also announced changes to the way immigration detention is managed to allow the detention of families with children to take place in the community with conditions set to meet individual circumstances. By the end of July 2005, we made sure all families with children were moved from immigration detention centres into alternative detention arrangements. My department funds and works with non-government organisations to ensure people in community detention arrangements are properly supported.

We also appointed Detention Review Managers to ensure decisions to detain people under the *Migration Act 1958* are made lawfully and reasonably. These are senior officers in our state and territory network who review the initial detention decision and continue to review the cases of people in immigration detention on an ongoing basis.

As part of our commitment to fair and reasonable dealings with clients, we introduced a new case management service delivery approach for vulnerable clients early in 2006 and this is working well.

In May 2006, we initiated a Community Care Pilot in NSW and Victoria with the Australian Red Cross for the provision of community assistance to help vulnerable clients in the community. We also engaged the International Organization for Migration to provide information and counselling services to help prepare clients for their immigration outcome.

The Palmer and Comrie reports and later reports by the Ombudsman raised major concerns about the way we deal with identity issues. In response, we are implementing an Identity Management Strategy.

The National Identity Verification and Advice Section has been expanded to provide better support for our officers seeking to correctly establish the identity of clients encountered in the field and in detention. The section recently received its 500th referral and has an ongoing caseload of around 50 cases which it is actively investigating.

We have also established a 24/7 Immigration Status Service to help Australian-based police services determine a person's immigration status. This provides a central contact point for police making immigration status enquiries, and consular officials making enquiries about their nationals that may be in detention. At 30 April the service had received around 8 000 enquiries, of which 90 per cent related to people who were in Australia lawfully.

Our Law Enforcement Liaison Unit was also strengthened and improved with streamlined processes, improved record-keeping and accountability, and reduced response times. This unit is the initial point of contact for all requests by law enforcement agencies for assistance in locating missing persons.

The reforms to our detention environment have been the most significant since the introduction of mandatory detention and I'm particularly pleased about the recognition of the reforms by major external agencies — which I'll cover in a moment.

To underpin the reforms in all operational areas of the department we are implementing an ambitious business transformation through the roll-out of a more integrated and accessible IT system under the \$495m *Systems for People* programme.

The first major release of portals occurred in April, including a case management portal and a compliance portal. The next release in July will include a detention services portal, with further releases for the next three years.

These changes will progressively improve our services to clients and the consistency in our business processes, record keeping, quality control and reporting.

Among other improvements, staff will be able to see a single view of a client's history, be confident about a client's identity and be confident they are viewing the client's only record. These functions were not previously available from our legacy IT systems.

All this work over a range of programmes means that we are much better placed to act lawfully, fairly and reasonably in carrying out our immigration detention and compliance functions.

Positive reactions to our change and improvement programme

I would like to record some of the positive feedback we have been receiving from groups and individuals on these reforms.

The Minister, Kevin Andrews is on the record as saying implementation of the Palmer report is 'well-advanced' and the former minister made similarly positive comments.

The Commonwealth Ombudsman, John McMillan said late last year that there had been 'significant culture change' in the department.

He has also commented that:

'there is a strong framework that has been established for better staff training. A College of Immigration has been established... [and]...agencies such as my own have been actively involved in the development of the curriculum for officers'.

And the Human Rights Commissioner, John Von Doussa has said that:

'[the department]...has made great strides towards creating a more open and accountable organisation'.

He also said:

'I recognise and respect the great strides that DIMA has made towards creating a culture which does respect human rights'.

And in the recent release of a report on detention visits, Human Rights Commissioner, Graeme Innes said³:

'It is clear to us that the [department] has gone to great lengths to improve the approach and attitude of staff towards detainees in immigration detention centres over the last year.'

The Chair of the Detention Health Advisory Group Work Program, Associate Professor Harry Minas, has commented that:

'Much has been achieved and the DeHAG has made a substantial contribution to the development by the department of new approaches to the provision of health care to immigration detainees, all in a context of very rapid change'.

These comments are encouraging, and we will continue to work closely with our stakeholders, recognising our common interest in resolving cases as quickly as possible within a framework of a lawful, fair and reasonable decision, and leaning as much as we can to improve the operation of our programmes.

I also recognise very clearly, and I remind my staff frequently, that there is much more to do in cementing cultural and business change in all our programmes.

³ *Summary of Observations following the Inspection of Mainland Immigration Detention Facilities*, Human Rights and Equal Opportunity Commission, released 19 January 2007

Conclusion

I would like to leave you with a final thought on designing public policies and programmes.

It is not widely enough recognised in my view that the Palmer report had implications for all public sector organisations, especially in the design of new policies and programmes. From my perspective these lessons learned encompass the importance of a client focus, effective record-keeping, governance and risk management, as well as broader requirements such as the establishment of a unified culture and values throughout dispersed and diverse organisations, and the need for strong leadership.

If a programme seems to be running smoothly, it can be easy to be complacent about these matters and not disturb the status quo. But the fact is that every aspect of public administration is evolving in terms of the environment we work in and client and stakeholder expectations.

Risk management is a case in point. When the then MAB/MIAC or Management Advisory Board / Management Information Advisory Committee issued their landmark 'Guidelines for Managing Risk' in 1996, the preparation of a risk management plan was almost an intellectual exercise. These days, risk management is an integral part of any public sector programme and we can expect bodies like the Joint Committee of Public Accounts and Audit or the Australian National Audit Office to be unimpressed if we are not managing risks effectively.

It's no coincidence that the first sentence of my department's Onshore Compliance Programme Plan for 2006-07 is 'This programme plan is based on a risk management approach...'

My point is that the design of a new programme is an opportunity to reflect these evolutionary changes in the public sector environment. So with a new programme, we can establish new ways of working in terms of responsiveness to client requests, record-keeping, staff culture and so on.

This was one of the key advantages that I had when I was appointed to DIAC as secretary in July 2005. I had an opportunity to design new programmes and approaches using the best of contemporary thinking to meet current needs and even anticipate future trends and expectations.

Of course, the introduction of new policies and programmes is often undertaken urgently in response to some identified need. You either need to take some time for reflection to make sure the design is the best possible, or be ready with your ideas when the new programme is needed urgently.

I would encourage everyone here to keep this in mind when you manage or contribute to the design of policies and programmes in the future. You may only get the one opportunity to set the programme on the best footing and you need to grasp the opportunity when it comes. If you can do that, you may find that your specific programme becomes a flagship for cultural and business change, with your improved approaches being adopted by others in your organisation, or indeed in other organisations.

Thank you.