



Western Australia 2021 Election

Policy Platform

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About us



Consult Australia is the industry association representing consulting businesses in design, advisory and engineering. Our industry comprises some 48,000 businesses across Australia, over 97% of which are small businesses and also include some of Australia's top 500 companies, providing solutions for individual consumers through to major companies in the private sector and across all tiers of government. Our industry is a job creator for the Australian economy, directly employing 240,000 people. The services we provide unlock many more jobs across the construction industry and the broader community.

Some of our members are:



Executive summary

Consult Australia's policy platform for the 2021 Western Australian Election seeks to emphasise the importance of infrastructure and built environment projects for improving our economic prosperity, creating thriving and sustainable communities, and providing valuable links for people and goods. Improving our approach to these projects will have a compounding effect on economic growth across Western Australia.

Improving how we deliver projects in Western Australia is not as simple as increasing the total spend. We must continuously improve how we plan, fund, procure, design, and deliver new projects. This must be underpinned by a vibrant and sustainable workforce with the right capabilities and capacity to meet demands.

The impacts of COVID-19 on Western Australia must be taken into account. Western Australia's swift and effective public health measures minimised the health impacts of the pandemic and recent high commodity prices have protected the Western Australian economy however, the implications of the mini-resources boom places pressures on the state. The consulting industry are looking for government responses and policy that balances these issues to ensure a strong and prosperous future.

As a traditional driver of economic growth, Consult Australia believes the infrastructure and built environment industry can play an important role in Western Australia's economic prosperity and we have developed the following recommendations. The industry is also seeking strong government leadership around social and environmental opportunities to enable the design industry to effectively contribute to a more just and sustainable society.

Pipeline - shaping Western Australia's recovery through a long-term pipeline of projects

- A minimum level of infrastructure grant funding as a proportion of GDP in future budgets
- An improved asset recycling initiative focused on ongoing public benefits
- Infrastructure announcements backed by Infrastructure WA

People - a sustainable workforce and vibrant workplaces in the built environment industry

- A built environment workforce strategy to increase the sector's capacity
- A mentally healthy workplaces strategy to improve government and industry practices

Procurement - delivering better value through improved arrangements and partnerships with industry

- Adopt Consult Australia's Model Client Policy
- Streamline procurement practices and the use of collaborative contracting models
- Upskill procurement expertise to ensure consistency across government
- Reform civil liability legislation in Western Australia to explicitly prohibit contracting out of proportionate liability for professional services contracts

Practice - ensuring a certain and stable regulatory environment

- Broaden the existing digital infrastructure strategy to embrace new tools and technologies
- Require consultation regulatory impact assessments for all reform proposals
- Reduce payroll tax for small and medium enterprises for two years, acknowledging the significant strain the worsening insurance conditions have on that sector.
- Prioritise reforms that deliver community safeguards and do not unnecessarily burden industry

Pipeline – Shaping Western Australia's economic recovery through a long-term pipeline of projects

Minimum level of infrastructure grant funding

Recommendation 1.1: *Commit to a minimum level on infrastructure grant funding as a proportion of GDP in future budgets to help provide industry certainty and to support planning decisions*

We see a range of benefits from the Western Australian Government committing to a minimum level or 'baseline' of public infrastructure grant funding in future budgets based on a proportion of the state's gross domestic product (GDP). This approach has been used by the UK Government, locking in a commitment of public infrastructure investments equating to 1-1.2 per of GDP, which then informs their long-term infrastructure strategy and plans.¹ Some benefits of committing to a minimum level of public infrastructure grant funding include:

- providing certainty to industry to invest in their capability and capacity
- delivering sustained benefits to the community including driving environmental and social outcomes through government procurement and delivery practices
- avoiding peaks and troughs in project pipeline that has traditionally occurred with public infrastructure investments – a 'lumpy' pipeline has a direct impact on productivity
- helping to develop a more refined infrastructure strategy and planning approach which in turn can deliver greater value for money.

A commitment to a minimum level of public infrastructure grant funding can help contribute to more strategic arrangements with the Commonwealth about grant funding for infrastructure between states. We believe clear targets should support the case for a steady flow of Commonwealth grant funding for new nationally significant infrastructure projects.

It is important to note that we do also see significant benefits from increasing private financing and funding of Western Australia's infrastructure to help meet future growth demands, maintain the state's prosperity, and to unlock revenue for other policy priorities. However, we agree with the view that this can result in negative outcomes if a privatised approach is in lieu of a strong commitment to public infrastructure.

A minimum level for public infrastructure grant funding ensures that any private investments can be viewed by the community as supplementary, rather than a substitute, to public investments. We believe that negative responses to previous initiatives around Australia, such as asset recycling and public-private partnerships for projects, were because the community believed that these investments would substitute public investment rather than complement them.

As such, a minimum level commitment to public infrastructure grant funding can help address any negative perceptions of private financing or other funding opportunities, particularly when both together are delivering clear community benefits. This balance becomes even more relevant as governments seek to leverage infrastructure investments to help drive the economic recovery from COVID-19.

¹ National Infrastructure Commission (UK), [National infrastructure assessment – funding and financing](#)

An improved asset recycling initiative

Recommendation 1.2: *Renew an asset recycling policy focused on delivering ongoing public benefits to the community*

We acknowledge there has been shortcomings in previous approaches to asset recycling around the country. One shortcoming we see with the previous Australian Government asset recycling initiative was the 15 per cent 'first come, first serve' bonus for state and territory governments based on the asset transfer transaction price. We believe this encouraged more of a focus on the upfront public benefit from additional revenue than the ongoing public benefit from service outcomes.

Asset recycling does not lead to successful or unsuccessful outcomes by default. It only results in a 'win-win' for all stakeholders, particularly the community, when improved efficiency and service provision outweighs higher borrowing costs and profit margins. The concept should not be rejected by default, but considered as one option amongst many to keep pace with infrastructure investment demands.

As outlined in Consult Australia's [Re-building the social licence for asset recycling](#) report, we recommend that Western Australia renew an asset recycling policy, which focuses less on maximising the upfront value of an asset and more on ensuring the right conditions are in place that deliver community improvements and quality service outcomes for the public. This policy should adopt eight key conditions for asset recycling that are outlined in our report on the topic.

- Asset recycling must be underpinned by competition, contestability or regulatory controls that protect public interests by appropriately limiting the profit maximising opportunities of private sector investors.
- A preference to transfer assets to the private sector as a lease as opposed to a full sale, continuing government ownership, but shifting the ongoing operations of assets to the private sector.
- All asset leases should include clear handback conditions relating to ongoing maintenance and upgrades, managed through strong enforcement arrangements.
- Ensuring asset transfers are structured as 'steward' arrangements which include performance indicators and funding schedules aligned to service outcomes.
- An asset recycling process that includes a requirement for governments to model longer-term impacts on user costs from asset transfers to the private sector.
- An asset recycling process that includes an upfront public consultation to provide an opportunity to understand and address community concerns before an asset is transferred to the private sector.
- Re-investing proceeds from asset recycling into new infrastructure projects.
- Ensuring asset recycling is resulting in tangible benefits for users impacted by transfers to the private sector, through service improvements and/or re-investing some of the proceeds on infrastructure needs in the surrounding area.

Accelerate Western Australia's COVID-19 economic recovery through high-value projects

Recommendation 1.3: *Ensure infrastructure announcements in the budget, including the fast-tracking of funding for projects, are backed by existing assessment processes*

Increasingly over recent months, the role of infrastructure investments has been rightly described in public discussions as a critical policy lever to help the Australian and Western Australia economies recover from COVID-19 impacts. We are also increasingly seeing infrastructure and new investments as enablers of broader economic, environmental and social development in cities and regions rather than a traditional demand-versus-capacity approach asset-by-asset.

Consult Australia believes a focus on boarder economic and social benefits underscores why governments should continue to follow robust governance and decision-making processes to inform infrastructure investment decisions. Our recently released report on [Considering social impacts in infrastructure business cases](#) highlights some of the key benefits from adopting social considerations early in design thinking. This will maximise investment outcomes, particularly in the context of fast-tracking new projects to stimulate a slowing economy. The capital spend is too often the focus when measuring the benefits from investments or the effectiveness of a government's approach. Instead, we firmly believe infrastructure investment decisions by governments should be centred on how the project will deliver ongoing value to the economy and the community (i.e. the post construction whole of life value), and that this be a key component of the business case assessment.

The Western Australian Government has made inroads in recent years establishing Infrastructure WA as an independent statutory body to guide infrastructure needs and to provide advice on the priority and effectiveness of project proposals. We believe the government should continue to ensure Infrastructure WA is empowered to inform all of the infrastructure investment decisions through business case assessments for project proposals and through the infrastructure priority list.

Additionally, we believe there is an additional role for the Western Australian Government to ensure there is an appropriate spread of project types and work packages for businesses of all sizes to benefit or participate in its pipeline of projects. This includes consideration of the size and scale of projects and opportunities to break-up mega projects into smaller packages to give smaller and predominantly local businesses the ability to participate to deliver sector-wide productivity.

Fast-tracking the delivery of projects to help boost the economy should not skip or rush these important upfront considerations, as they are critical for ensuring downstream challenges are considered and there is a smart long-term pipeline of high-value infrastructure projects. This point is highlighted in our thought leadership report on [infrastructure governance](#) released in 2018.

Further government investment should be directed to areas that will assist in strategically moving Western Australia from its dependence on mining and oil and gas into other industries that will align with future global demand. Government policy and a positive regulatory environment that would support new industries, including the promotion of transition to low/neutral carbon energy sources would position Western Australia positively for growth in the future.

People – a sustainable workforce and vibrant workplaces for consulting firms in the built environment industry

A built environment workforce strategy to increase the sector's capacity

Recommendation 2.1: Fund and develop a strategy to increase Western Australia's capacity to deliver infrastructure projects and expand the pipeline of future talent for careers in our sector

Skill shortages have been growing across the broader built environment workforce over recent years due to the increasing number of infrastructure projects being delivered across Australia. While areas of the broader industry have been impacted by COVID-19, demand in areas such as publicly funded infrastructure projects continue to grow as additional investments are used to help drive the economic recovery from the pandemic. However, our ability to keep pace with the scale of projects needed to deliver these ongoing economic benefits in response to COVID-19 impacts is limited if we are not also strategically addressing the root cause of skill shortages and aiming to increase industry's overall capacity.

Our [2020 skills survey results report](#) highlighted the significant challenge our members currently face in recruiting key engineering disciplines. The three key disciplines, civil engineer (and civil engineering technician), structural engineer (or bridge engineer) and transport engineer (or traffic engineer) top the list and are integral to key COVID-19 recovery activities. Furthermore, challenges continue to exist for businesses with 83% of businesses identifying mid-level experience civil engineering roles difficult to find suitable candidates, followed by 75% of businesses experiencing challenges for senior and principal level civil engineers.

Addressing skill shortages is not as simple as increasing our recruitment activities, particularly for mid to senior level roles that require years of professional experience. The skills needed by our member firms are underpinned by the education system. A sufficient number of students progressing through STEM subjects into related university courses is required, with enough graduates to then pursue a career in our industry sector – i.e. a strong STEM talent pipeline. Our sector's ability to develop professional skills and provide the experience needed to replenish the capabilities of our workforce are limited without a sufficient pipeline of talent. This problem is exacerbated during periods of elevated infrastructure investments – which in our view makes our sector more vulnerable to skill shortages, unsustainably stretches our workforce's capacity, and results in the offshoring of skills and resources by squeezing fees.

Consult Australia believes these challenges can be addressed by the Western Australian Government developing a long-term strategy to ensure the built environment workforce has the capability and capacity to continue delivering a growing pipeline of infrastructure projects over the next 15 to 20 years.

The strategy should include:

- a root cause analysis of skill shortages in the built environment industry, which also considers COVID-19 impacts
- a map of the range of skills needed across the industry and link these to current education and training pathways
- outline policy improvements and targeted investments to unlock capability and capacity constraints

We believe the strategy should also consider:

- measures that will support greater gender diversity and increase the pool of indigenous candidates in the pipeline of talent
- explore the barriers for skilled migrants entering and succeeding in the built environment industry locally
- the shift in demand and new skill requirements from the uptake of new technology and data analytics, and the impact this will have on project delivery such as the need to move away from binary skills and to strengthen creative thinking, problem-solving, and other skills
- benefits from increasing the number of Commonwealth supported university places for engineering degrees, and new scholarship opportunities to attract high-performing students
- reforms aimed at attracting more students into STEM subjects at primary and secondary schools, and addressing [STEM education challenges](#) that we identify in a recent discussion paper.

This strategy should be developed in collaboration with the education sector and supported by industry and ensure it has flexibility to address the key concerns existing currently as a result of quarantine rules. Short-term interstate movements may be improved, but the industry is seeking government to explore how to improve overseas migration of skilled workers into Western Australia. Skilled migration has been an integral part of meeting our workforce requirements and improving the outputs of delivery for Western Australians through bringing in critical skills.

A mentally healthy workplaces strategy to improve government and industry practices

Recommendation 2.2: *Expand the mental health at work action plan to outline how a framework and funding targeted initiatives can support workplaces to improve mental health outcomes*

As outlined in Consult Australia's [Striving for mentally healthy workplaces](#) report, we believe a comprehensive and integrated approach combined with a substantial funding commitment can improve mental health outcomes for workers. The NSW Government has set the benchmark for an appropriate approach through their Mentally Healthy Workplaces Strategy 2018-22.

Consult Australia recommends the Western Australian Government further expand its mental health action plan to develop a mentally healthy workplaces strategy. This expansion should focus on outlining how a framework can turnaround outcomes particularly in at-risk sectors and set tangible performance targets for the strategy and key actions.

This strategy should be backed up by appropriate funding to also deliver targeted initiatives focused on delivering meaningful change. This should include funding for more proof-of-concept trials by NGOs, and other organisations such as universities, which could result in significant improvements and a more comprehensive evidence base towards mental health practices in the workplace.

Western Australia's approach to mental health in the workplace should be outputs-focused, noting an inputs-focused and 'black and white' regulatory approach does not appropriately consider the nuance and differences for individuals around mental health. This is why we are strong supporters of an incentives-focused mentally healthy workplaces approach.

Procurement – delivering better value through improved arrangements and a partnership approach with industry

Better procurement practice and improved collaboration for a productive and viable supply ecosystem

Recommendation 3.1: *Commit to and adopt the Consult Australia Model Client Policy as a means to ensure economic recovery from COVID-19 impacts*

Consult Australia continues its call for all governments to embed Consult Australia's [Model Client Policy](#) into procurement practices. Like the Model Litigant Policy, a Model Client Policy commits government, as a major procurer of goods and services from the private sector, to behaving ethically, fairly and honestly in their contractual dealings with the private sector. Essentially a 'Model Client' works collaboratively with industry to achieve mutually beneficial outcomes and does not use market power to the disadvantage of local businesses and their employees. That is, Western Australian government departments, entities and statutory authorities should:

- operate in good faith and act ethically, fairly, and honestly in all dealings
- never use status, power or authority to gain unfair benefit or advantage
- undertake appropriate risk assessment, management, and allocation, which allows for innovation and collaboration
- void undermining the stability of the professional indemnity insurance market, through inappropriate risk allocation
- adopt fairness in contracting through proportionate liability and limits on liability
- avoid use of non-standard contracts, and variations to standard contracts without clear reasoning
- be clear, consistent, transparent, and focused on best for project outcomes in procurement and delivery methodology
- engage early and maintain open and constructive communication between all parties, dealing with them equally
- foster productive and healthy working relationships throughout the supply chain, recognising the roles of each party
- plan and prioritise projects, avoid making assumptions about industry capacity or capability
- keep costs of tendering and documentation requirements to a minimum
- provide clear, well structured, accurate briefs, and allow reasonable review and response times
- settle invoice payments and payment claims on time
- foster a culture of continuous improvement and innovation, through the recognition of procurement skills and training

As previously indicated, given the significant spend committed to infrastructure projects, even a one per cent efficiency gain would translate into significant savings – which is even more significant as we move to economic recovery from COVID-19. Our 2020 [Uplifting Productivity](#) report demonstrates through past projects how to prioritise collaboration and communication. While our 2019 [Innovation in Infrastructure](#) report demonstrates, improved procurement practices can also lead to more innovative delivery of projects.

Recommendation 3.2: *Commit to streamlining procurement practice and the use of collaborative contracting models to ensure projects can be effectively fast tracked to assist economic recovery from COVID-19 impacts*

Western Australia has recognised the benefit of a central procurement policy; we note the [Department of Finance's Works Procurement Policies](#) that prioritise:

- value for money
- open and effective competition
- probity and accountability
- occupational safety and health.

Despite this overarching policy, different government departments and agencies have each developed procurement practices that could be streamlined to ensure projects can be fast tracked to assist in economic recovery from COVID-19 impacts. It is suggested that these processes be reviewed and streamlined.

We propose that collaborative contracting be elevated in the Western Australian Government procurement framework. Our members have constructive discussions with individual Western Australian departments and agencies on collaborative contracting, but it would be beneficial if this was recognised as a whole of government initiative. We also suggest that the recommendations of our 2020 [Uplifting Productivity](#) report be incorporated into the government's procurement policies. Consult Australia is able to assist in such a review and implementation.

We also suggest that standard terms and conditions across government contracts need to be reviewed, as there are a number of concerning contracts. In particular, support for alignment of procurement practices within local government authorities in line with the current procurement reform program currently underway for government procurement practices would significantly improve the variability we see on contracting terms. This has been of particular concern to our small and medium enterprise (SME) consulting businesses who are major suppliers to local government authorities for the delivery of infrastructure and building works.

For example, where the purpose of Australian Standard AS4122-2010 for the engagement of consultants is undermined by additional local government and/or agency conditions. Once again, Consult Australia is well placed to assist in this review.

Recommendation 3.3: *Commit funding to upskill procurement expertise to ensure consistency across government and include public sector capability and capacity in the long-term workforce strategy set out in our Recommendation 2.1*

Unfortunately, despite the significant investment of the government in projects, we have observed a lack of procurement capacity and capability across agencies, particularly when dealing with large complex projects. It is recommended that funding be dedicated to upskilling procurement expertise as a means to assist in the economic recovery from COVID-19.

As set out in Recommendation 2.1 above Consult Australia believes these challenges can be addressed by the Western Australian Government through a long-term strategy to ensure the built environment workforce has the capability and capacity to continue delivering a growing pipeline of infrastructure projects over the

next 15 to 20 years. The application of this Recommendation 2.1 should include the public sector to ensure that it is wholistic and will maximise the productivity gains.

Recommendation 3.4: Reform civil liability legislation in Western Australia to explicitly prohibit contracting out of proportionate liability for professional services contracts

Proportionate liability is a statutory right, which ensures that a party is only liable in damages for the proportion of the suffered loss that is attributable to that party. It only applies to financial harm and economic loss, not to cases involving personal injury or death. Proportionate liability was introduced nationally through state and territory civil liability legislation to improve the availability and affordability of professional indemnity (PI) insurance in Australia following the insurance crisis of 2001 when the insurer HIH collapsed.

The key policy objective of proportionate liability – helping to ensure that PI insurance is available, affordable and dependable – is undermined if consultants are required by a client to contract out of the proportionate liability legislation.

These reforms were positively received by local and international insurers. However, insurers have also indicated that if the application of proportionate liability can be by-passed contractually the insurance market will price and allocate capital to Australian PI risk as if proportionate liability does not apply.

Consult Australia members advise that PI insurance cover is significantly difficult to acquire – especially at a reasonable price. As one example, multiple brokers specialising in engineering and professional services cover have advised that in some circumstances there is no cover ‘from any insurers, underwriters, or other markets (at any price)’. Consequentially without PI insurance, many members lose their licence to operate, either because they no longer comply with state/territory registration requirements, or they cannot comply with their clients’ professional services contracts, which all require PI insurance of a specified amount to be maintained (evidenced by a certificate of currency).

The current state of the Australian PI insurance market poses a significant risk to Australia’s economic recovery as small businesses face going out of business despite having sufficient work and dependable client base. Government interventions can help ‘de-risk’ the Australian insurance market. This includes restoring the policy intent of proportionate liability by reforming all civil liability legislation in Australia to explicitly prohibit contracting out of proportionate liability for professional services contracts.

Practice – ensuring a certain and stable regulatory environment

Broaden the existing digital strategy to address issues revealed during COVID-19

Recommendation 4.1: *Broaden the existing digital strategy to embrace new tools and technologies to address issues revealed during COVID-19*

Consult Australia members see inconsistency between Western Australian government agencies regarding their uptake and application of digital services and technology, there are pockets of excellence but also areas where it seems that senior executives do not have a good line of site of these issues. It is suggested that digital aspects be included in agency metrics so it is front of mind for all.

Building Information Modelling (BIM) is one way in which new trends, software, technologies, systems and processes can be developed and utilised to improve project delivery and productivity.

COVID-19 has highlighted how important technology is for example, in ensuring continuation of working remotely. A number of Western Australian departments, agencies, and statutory authorities were able to continue 'business as usual' through the use of online forms and e-portals. This is just one example of the productivity benefit that will come through the Western Australian government partnering with industry to drive forward its digital strategy.

It is recommended that the Western Australian Government prioritise digital by identifying the key technological barriers exposed during COVID-19 and focus on those to drive forward the next round of digital evolution.

Ensure reforms are balanced by valuing industry insights

Recommendation 4.2: *Require a consultation regulatory impact assessment process for all reform proposals to ensure industry insights are included early in regulatory development, to deliver the right balance of community safeguard to industry impost*

Consult Australia supports evidence-based decision making and therefore supports regulatory impact assessment processes to explore the real costs and benefits of reform proposals. When used in a consultative way, such processes can ensure that new reforms are not just additional red tape but are instead real reforms that balance the needs of the community with productivity in industry.

The need for well-designed reforms is necessary now more than ever as the Western Australian, the Australian, and the global economy recovers from COVID-19. The *Consult Australia COVID-19 Industry Health Check* (published in early June 2020 and again in September 2020) indicates that two-thirds of our member businesses are experiencing a reduction in work from COVID-19. Further 56% of members anticipate that competition across the industry will become tighter over the next six months.

We support the move made at the end of 2019 by the Federal Government to require a RIS when the reform is likely to lead to measurable changes in the behaviour of businesses or individuals.² Recent reforms undertaken by the Department of Mines, Industry Regulation and Safety on Registration of Engineers and the Approval Process for Commercial Buildings were supported by Regulatory Impact Statements which significantly improved the ability to engage with government on regulatory changes.

It is also vital that RIS' consider the broader market conditions, including how reforms impact on the insurance market. All reforms should strive to de-risk the insurance market as we face a worsening market with significant capacity constraints in Australia and globally.

Consult Australia is always willing to work collaboratively with governments to ensure better regulation, rather than just more regulation. The use of the consultation RIS process allows industry knowledge to be fed into the process earlier.

Short-term payroll tax reduction to ameliorate worsening insurance conditions

Recommendation 4.3: *Reduce payroll tax for small and medium enterprises for two years, acknowledging the significant strain the worsening insurance conditions have on that sector.*

Support for regulatory reform that will assist SME businesses remain competitive during the challenging economic environment presented by COVID-19 should remain a priority. Small business is a key supplier of design, advisory and engineering services that play a critical part in the Western Australian economy.

One area of regulatory reform that would make a significant difference is the area of payroll tax. Consult Australia is deeply concerned about the significant hardening of the insurance market, particularly in respect of professional indemnity insurance. This is impacting SMEs as insurance costs increase to levels that make continuing business a key challenge. De-risking the market is essential but is not a quick process. In the meantime, our SMEs need some form of short-term relief to remain vital contributors to the economy. One potential measure to assist is to reduce payroll tax to SMEs for two years as industry and government work together to de-risk the insurance market.

Prioritise reforms considering industry impact during COVID-19 recovery

Recommendation 4.4: *Prioritise reforms that deliver real community safeguards and do not unnecessarily impose financial and administrative burden on industry as it recovers from COVID-19 impacts*

As stated above, COVID-19 has had a significant impact on the economy. It is therefore necessary to review reform proposals through that lens. We call on the Western Australian Government to review the reforms on the books and prioritise those that will deliver real community safeguards, and which will not unnecessarily impose burdens on industry.

² Hon Ben Morton MP, [Strengthening the government's decision making regulatory impact analysis settings \(2019\)](#)

This might require certain reforms to be delayed or some reforms to be re-designed. It is essential that the government does not proceed down a reform path simply because it has been started. Now is the time for well-designed reforms.

Consult Australia remains willing to work collaboratively with governments to review reform proposals and provide pragmatic solutions to complex problems.

We believe re-evaluating regulatory reform is just as important as regulatory reform and the financial and administrative burden on small business industry is unnecessary would assist consulting businesses as they recover from COVID-19 impacts.

Contact us

We encourage political parties to consider the recommendations outlined in this policy platform as they finalise their election commitments, and we would welcome any opportunity to discuss these further. Please contact:

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