An analysis of the features of successful written submissions to government inquiries

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Abstract

Objective: Government inquiries present a policy window for advocates to influence policy. Evidence on how to write influential submissions, however, is sparse. We aimed to identify features of successful written submissions to the Parliament of Australia's Inquiry into Food Pricing and Food Security in Remote Indigenous Communities (Inquiry).

Method: A scoping review was conducted to identify influential features of written submissions to government inquiries. A content analysis of a sub-sample of government Inquiry submissions and their recommendations was then coded for influential features. The frequency of submission recommendations incorporated into the final Inquiry report was recorded, as was their link to influential features.

Results: Thirty features were identified. Results from 21 submissions indicate that when writing a submission to a government inquiry, advocates should: (1) ensure their submission is clear and concise; (2) convey the authority of both the writer and supporting evidence; and (3) where possible, align submission recommendations with the government agenda.

Conclusions: We encourage future research to test the framework of influential features on other inquiry topics and in other countries to increase the reliability of results.

Implications for Public Health: This study consolidates and presents a list of features that advocates can consider incorporating when writing a submission to a government inquiry.

Key words: public health policy, submissions, policy process, interest groups, advocacy

he translation of evidence into government policy is a well-documented challenge for experts and advocates. ^{1,2} Interest groups, including advocacy organisations, often compete to push different policy agendas to governments. ³ Common strategies used to influence the policy process include the use of policy entrepreneurs, ⁴ strengthening a position through a unified voice, ⁵ developing relationships with policymakers, ⁶ building public support, ⁷ utilising the media ⁸ and engagement with government inquiries. ⁸

Government inquiries provide an opportunity for advocates and other interested parties to inform government policy, often through written submissions in response to inquiries and/or presenting personal, professional and academic evidence at public hearings. In Australia, these inquiries are led by members of parliament through committees such as the 'Joint Standing Committee on Aboriginal and Torres Strait Islander Affairs' or the 'Select Committee on the Cost of

Living'. ¹⁰ Following an inquiry's consultation process, which involves written and often verbal submissions from interested parties, a publicly available report that outlines key findings and recommendations for government action is often developed. ¹¹ This report is then provided to the relevant government department(s) and other stakeholders for response and action, and it is publicly disseminated where appropriate.

The extent to which advocates can influence government policy through written submissions to inquiries is uncertain due to the complexity and multiple stages of the policy-making process ^{12,13} that occur between submission and policy outcome. This study therefore uses the term 'influence' in relation to the intent of the literature and the purpose of writing submissions. A recent pilot study examining the role of submissions on inquiry reports showed limited impact;¹⁴ however, a well-written submission is anecdotally believed to be influential.¹⁵ Despite the popularity of this method, there is a paucity

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of empirical and synthesised evidence examining the features of influential submissions to government inquiries. To address this gap in knowledge, we aimed to identify what features the literature identifies as influential and record the presence of these features in submissions that were utilised in a government report following a recent inquiry in Australia. This study is the first to consolidate and present a list of features that advocates can consider incorporating when writing a submission to a government inquiry.

Methods

The methods are presented in two sections. Part A relates to the scoping review of features. Part B relates to recording the presence of features from the literature review in submissions.

Part A: Scoping review of features

To inform our analysis, we wanted to identify which features were considered 'influential' when writing a submission. To do this, we conducted a scoping review of both peer-reviewed and grey literature. The search occurred between December 2020 and January 2021 and was informed by a scoping literature review methodology.¹⁶

Pre-eligibility screening criteria

Both the peer-reviewed and grey literature results were assessed against the inclusion and exclusion criteria. Inclusion criteria were: English language published between 2015 and 2021, full text accessibility, and content related to the influence of written communication on government policy change through a public inquiry process. The exclusion criteria were: literature that relates to non-democratic or low-/middle-income countries as classified by the World Bank, ¹⁷ and documents not in English.

Search strategy

Peer-reviewed literature

Scopus and the following EBSCOhost databases were searched: Business Source Premier, CINAHL Plus with Full Text, Communication and Mass Media Complete, Health Business Elite and MEDLINE.

The following search terms were used in both databases, limited to the abstract and title (plus keywords for Scopus): (influen* OR leverage) AND: (polic* OR "political will") AND: (government*) AND: (submi* OR propos* OR advoca*).

Grey Literature

A search strategy utilising grey literature databases, targeted websites and an advanced Google search was developed based on a previous search strategy by Godin et al.¹⁸

The following grey literature databases were searched: TROVE, UNSworks, the Commonwealth Scientific and Industrial Research Organisation (CSIRO), Analysis and Policy Observatory, and Capital Monitor (LexisNexis) Australia. We also searched Australian websites, including all jurisdictional whole-of-government websites (e.g. www.qld.gov.au); the Public Health Advocacy Institute of Western Australia; and powertopersuade.org. Our search of the grey literature was limited to Australian websites to maximise relevance within the project scope.

Varying sequences of the Boolean terms 'influen*, polic*, government*, submi*, and propos*' were searched in each grey

literature platform, with the first fifty results of each search being reviewed for inclusion as per previous grey literature studies.¹⁹ Incognito mode was used to avoid results being skewed by search history. When searches displayed no results or the results were irrelevant, platforms were searched through their tab functions or through trialling simplified searches. Further information can be found in Supplementary File 1.

Search functions could not always limit results by date, and not all results specified a date. Therefore, some results may have been pre-2015 or where the date is not known. Relevant grey literature results were 'favourited' to avoid duplication and filed in a bookmark folder.

Data extraction and analysis

Data from eligible peer-reviewed and grey literature were extracted into a data extraction table in Microsoft Excel with the following headings: date, source, author(s), influential features, definitions, measurement of influential features and additional notes. A PRISMA flow chart (Figure 1) documents the search and selection process.

All text in the 'influential features' column was summarised into overarching concepts using content analysis. The results were used to develop a framework of influential features of submissions, with similar features grouped into categories (Table 1).

Part B: Recording the presence of features from the literature review in submissions to the Inquiry

Design

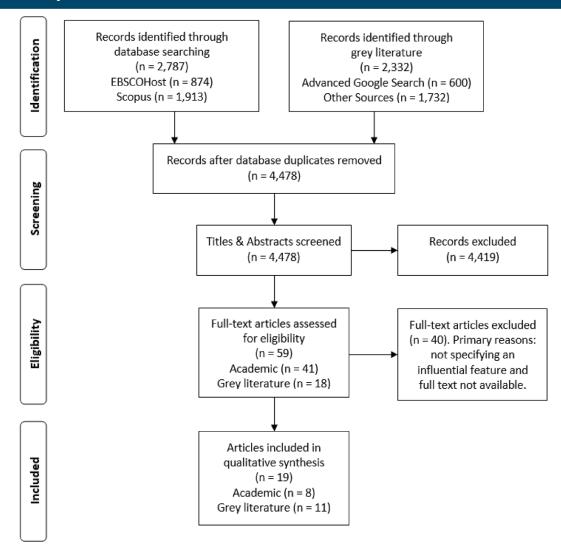
To determine whether our identified influential features were prevalent in submissions chosen to be included in government reports, we analysed a sample of submissions to the *Inquiry into food pricing and food security in remote Indigenous communities* (Inquiry), ¹¹ and the corresponding Inquiry report. We recorded the presence of our identified influential features in these submissions and then analysed the relationship between the presence of these features and the uptake of subsequent submission recommendations in the Inquiry report.

Context

In May 2020, the Minister for Indigenous Australians requested the House of Representatives Standing Committee on Indigenous Affairs (the Committee) to inquire into food pricing and food security in remote Indigenous communities. 11 The Inquiry received 128 written submissions from interested stakeholders that addressed any of the nine Terms of Reference (ToR). Public hearings were also held, predominantly with stakeholders who had previously provided a written submission. The committee was comprised of eight elected members of parliament, five from the government in power at the time (including the chair), and three from the opposition party. These members were supported by secretariat staff.

In November 2020, the Committee released the Inquiry report, which consolidated information from written submissions and public hearings .¹¹ A whole of government response to the Inquiry recommendations was subsequently tabled on December 2, 2021; however, this has not been included in the analysis as it was not directly informed by submissions.

Figure 1: PRISMA flow diagram-literature review.



Selection of submissions

We downloaded all 113 publicly available Inquiry submissions from the Committee's website.¹¹ Submissions were categorised under the following eight stakeholder groups:

- i. Aboriginal and/or Torres Strait Islander Controlled Organisations or Corporations
- ii. Food Industry and Associated Services operating in remote Aboriginal and Torres Strait Islander communities
- iii. Food Industry operating in non-remote areas
- iv. Universities and Research Institutes
- v. Government Agencies and Associated Entities
- vi. Professional, Advocacy or not-for-profit Charitable Organisations
- vii. Remote Community Member/s
- viii. Interested Individual/s

Three submissions per stakeholder group were chosen for analysis (24 total) to ensure maximum variation across stakeholder groups.

Submissions within each stakeholder group were randomly selected and assessed for eligibility against the inclusion and exclusion criteria below. A redraw was conducted when selected submissions were deemed ineligible.

Inclusion criteria

Submissions that were available for public download and provided at least one recommendation within the ToR of the Inquiry were included. We defined 'recommendation' as a call to action of the government within a submission.

Exclusion criteria

Submissions and/or recommendations within submissions were excluded if they were clearly outside the scope of Commonwealth Government action (e.g. operator A within a specific community should operate the community store instead of operator B), if the content could not be generalised beyond the individual setting (e.g. applied only to an individual store), or if the government had already implemented the recommendation (e.g. develop a food security working group) prior to the Inquiry.

	e 1: Influential features of submissions and their definition.	D.C. W.	
	Influential feature	Definition	
	Clear and Concise		
1	The main points are summarised early in the submission 9,15,20–23	A summary of the main points is provided up front. This may be in the form of a few sentences, dot points or a executive summary.	
2	Core issue or position is summarised in a quotable 1-2 sentences ¹⁵	A core issue or position relating to a recommendation is summarised in 1-2 sentences and can be easily understood without further context. These sentences may or may not stand out from the surrounding text.	
3	Use of sub-points that relate to the central issue ²⁰	The central reason for the submission is clearly broken down into sub-points.	
4	Use of meaningful headings 15,23–25	Obvious and meaningful headings are used within the submission.	
5	Submission topic is clearly stated ²⁶	The topic of the submission is clearly stated in a consolidated form.	
6	Recommendations stand out from the surrounding text 9,15,22	Recommendations stand out from the surrounding text (e.g. bolded, separated by spacing, in a box).	
7	Indication of why the recommended position is better than the alternative ²³	A recommendation is compared to an alternate view to highlight why the recommendation is better.	
8	Both the issue and the solution/recommendation are clearly linked 15,21,24,25,27	The solution/recommendation is clearly linked to an issue that has been described.	
9	Succinct (≤4 pages) ^{20,23,24,26,27}	The written part of a submission is \leq 4 pages. This excludes pages that are not intended to contribute to th Inquiry outcomes (e.g. title page).	
10	Unnecessary repetition is avoided 9,22	Contextual information relating to a recommendation is provided once and is not repeated. Contextual information does not include the recommendation itself.	
11	Source of information provided is referenced ^{23–25}	Any form of reference that allows the reader to find the source of the information. This does not need to aliquith an approved referencing style.	
12	Additional details extraneous to the submission are provided in a link or reference ¹⁵	A reference to additional information is provided. This excludes referencing information already detailed in th submission.	
13	Inclusion of an introduction ^{21,23,24}	The submission contains an introduction. This may introduce the author(s), relevant experience/expertise, why the	
		author is interested, and how the topic affects the author.	
14	Inclusion of a conclusion ²⁰	A summary of main points is provided at the end.	
15	Pages are numbered ¹⁵	Presence of page numbers.	
	Convey Authority		
16	Use of evidence not in the public domain ¹⁵	Reference to any form of information that: a) was not previously available to the public; b) is presumed to b systematically collected; and c) is used to provide evidence for a recommendation (e.g. retail sales data).	
17	Use of academic evidence or publicly available reports not from the government 6,9,21,24,25,27	Uses evidence that is: a) publicly accessible; b) not from a government report; and c) is presumed to be systematically collected (e.g. academic research findings).	
18	Example provided of the recommendation being successful ²³	Use of a real example of a recommendation's success (e.g. 'This approach has been trialled with success in Canada').	
19	Use of a story or case study ^{21,26}	Use of a real or hypothetical story or case study in support of a recommendation.	
20	Claim of expert support ²⁸	A recommendation is framed as being supported by experts (either consumer, academic or professional expertis. The expert(s) may be the writer of the submission or referenced in the submission.	
21	Claim of public support 7,28,29	A recommendation is claimed to be accepted or supported by members of the public.	
22	Personal perspective highlighted ^{9,27}	The writer's personal perspective or opinion is referenced.	
23	Writer/organisation is framed as socially responsible 30	The authors of the submission are framed as doing the right thing by society.	
24	Opposing evidence or advocates discredited ^{29,30}	Evidence or advocates that oppose a recommendation are discredited.	
25	Joint submission from multiple partners ⁸	Multiple parties have developed the submission, and this is highlighted, such as through authorship. Parties ma include organisations or individuals.	
26	Use of professional tone ^{20,23,26}	Submission is written in a professional tone, that is, being respectful, having an appropriate amount of formality, and not being hostile.	
	Align the submission with the Government Agenda		
27	Use of evidence from government reports ³¹	Reference of a report that was developed or funded by the relevant government to provide evidence for a recommendation, e.g. 'The Productivity Commissioner's report recommended'	
28	Highlights where submission content aligns with government policy ^{23,24,26}	Aspect(s) of government policy that the author agrees with that relate to the topic of the recommendation ar identified.	
29	Framed to align with government views 7,26,32,33	Alignment between the proposed recommendation and government views or previous action is highlighted.	
	One or more of the ToR are clearly addressed 9,15,20–22,32	5	

ToR = Terms of Reference.

Data extraction and analysis

All included submissions were extracted into an Excel spreadsheet. A separate Excel spreadsheet recorded the stakeholder group writing the submission and any recommendations from within their submissions. We used the identified influential features from the scoping review (Table 1) to code first the features used in each

submission and then the submission recommendations. For example, submission #106 was assigned the code 'inclusion of an introduction' (among others), and one of its recommendations was assigned the code 'use of evidence from government reports', (among others).

After coding the submissions against influential features in Table 1, we then analysed the report developed in response to the Inquiry

(Inquiry report) to determine what recommendations from submissions were included in the Inquiry report. A recommendation from a submission was coded as included in the Inquiry report if it aligned either verbatim or as a concept. Where a code related to the whole submission (e.g. use of a professional tone), all submission recommendations were assigned this code. We then analysed the relationship between the presence of these features and the uptake of subsequent submission recommendations in the Inquiry report. The data analysed for this stage needed to meet the following criteria:

a) An influential feature had to occur at least twice in a submission linked to recommendations unless the submission only had one recommendation, or the feature related to the whole submission

- (e.g. use of an introduction), in which case one occurrence of the feature was sufficient.
- b) At least two recommendations within the submission had to contain an influential feature and make it into the Inquiry report. For example, submission #67 had four recommendations where an 'example was provided of the recommendation being successful', two of which made it into the Inquiry report, so only these two were included in the analysis.

This information was then used to populate a table that listed: a) influential features; b) the number of submissions with this feature; and c) the number of times submissions had ≥ 2 recommendations

	Feature	# Submissions with the feature	# Submissions where ≥2 recommendations with the feature were incorporated ^a into the Inquiry report ^b	% submissions where ≥2 recommendations with the feature were incorporated into the Inquiry report •
15	Pages are numbered	13 (62%)	13	100%
12	Additional details extraneous to the submission are provided in a link or reference	8 (54%)	8	100%
25	Joint submission from multiple partners	5 (24%)	5	100%
28	Highlights where submission content aligns with government policy	5 (24%)	5	100%
20	Claim of expert support	4 (19%)	4	100%
23	Writer/organisation is framed as socially responsible	4 (19%)	4	100%
1	The main points are summarised early in the submission	4 (19%)	4	100%
21	Claim of public support	1 (5%)	1	100%
19	Use of a story or case study	18 (86%)	16	89%
11	Source of information provided is referenced ^{23–25}	15 (71%)	13	87%
30	One or more of the ToR are clearly addressed	21 (100%)	18	86%
26	Use of professional tone	21 (100%)	18	86%
4	Use of meaningful headings	14 (67%)	12	86%
13	Inclusion of an introduction	18 (86%)	15	83%
3	Use of sub-points that relate to the central issue	6 (29%)	5	83%
27	Use of evidence from government reports	6 (29%)	5	83%
5	Submission topic is clearly stated	11 (52%)	9	82%
17	Use of academic evidence or publicly available reports not from the government	15 (71%)	12	80%
18	Example provided of the recommendation being successful	14 (67%)	11	79%
14	Inclusion of a conclusion	9 (43%)	7	78%
2	Core issue or position is summarised in a quotable 1-2 sentences	12 (57%)	9	75%
6	Recommendations stand out from surrounding text	8 (38%)	6	75%
8	Both the issue and the solution/recommendation are clearly linked	18 (86%)	13	72%
9	Succinct (≤4 pages)	7 (33%)	5	71%
22	Personal perspective highlighted	10 (48%)	7	70%
10	Unnecessary repetition avoided	19 (90%)	13	68%
16	Use of evidence not in the public domain	9 (43%)	6	67%
7	Indication of why the recommended position is better than the alternative	5 (24%)	3	60%
24	Opposing evidence or advocates discredited	4 (19%)	2	50%

The feature "framed to align with government views" was identified in the literature (Table 1), however the development of a measure for this was considered beyond the scope of this study.

^aWhere the recommendation is incorporated in the Final Inquiry Report verbatim or as a concept.

^bOr where 1 recommendation is incorporated into the Final Inquiry Report, where the submission has ≤2 recommendations linked to the feature.

linked to an influential feature that were included in the Inquiry report (Table 2).

Results

The results are presented in two sections. Part A describes the results of the scoping review of features. Part B describes the results of recording the presence of features from the literature review in submissions.

Part A: Scoping review of features

The scoping review of grey and peer-reviewed literature identified 30 influential features of written submissions to government inquiries (Table 1). Influence was empirically measured for only two of these features.^{28,31} One study demonstrated that policymakers within the Minnesota Department of Natural Resources were more likely to consider information provided by experts as 'substantive' compared to lay members of the public.²⁸ The other found that evidence from government reports was disproportionately utilised by policymakers in the U.S. Environmental Protection Agency compared to other evidence provided in submissions to a public consultation process.³¹ The remaining results were predominantly narrative in nature and limited to the authors' perceptions of what is influential. The most commonly cited influential features were: 1) providing evidence for claims ^{6,9,21,24,25,27}; 2) clearly addressing one or more of the ToR^{9,15,20–22,32}; 3) that the main points are summarised early in the submission ^{9,15,20–23}; and 4) that the submission is concise. ^{20,23,24,26,27} All features and their definitions are reported in Table 1.

Part B: Recording the presence of features from the literature review in submissions to the Inquiry

Twenty-four submissions representing eight different stakeholder groups were initially chosen to be examined. Five were excluded as they did not provide any recommendations. This included all three submissions from the 'Food Industry operating in non-remote areas' category. Two more submissions were randomly selected to replace those excluded from the 'professional, advocacy or not-for-profit charitable organisations' and 'remote community member(s)' categories. Twenty-one submissions remained for analysis.

The number of times that influential features were present in the submissions, the number of times that submission recommendations with these features were incorporated into the Inquiry report, and a proportional comparison of these data are outlined in Table 2. We found the most common features included in submissions were: clearly addressing the Inquiry's ToR; using a professional tone; and using a story or case study. Less utilised features included: claiming public or expert support; framing the writer/organisation as socially responsible; summarising the main points early in the submission; and discrediting opposing evidence or advocates (see Table 2).

Discussion

We aimed to identify the features that the literature suggests are influential in government submissions and then record the presence of these features in submissions utilised in a government report in response to a recent inquiry in Australia. Features generally relate to the use of evidence, persuasive writing, submission structure, framing and clarity. Many of the features identified in the scoping review were

present in the submission recommendations utilised in the Inquiry report. The key findings from our analysis are discussed below.

Clear and concise

The features most likely to result in recommendations being incorporated into government inquiry reports related to developing a clear and concise submission. For example: the use of meaningful headings; providing additional details extraneous to the submission in a link or reference; summarising key points early in the submission; summarising core issues in a quotable 1-2 sentences; recommendations standing out from the surrounding text; the inclusion of an introduction and conclusion; and numbering pages.

The importance of being clear and concise features heavily in submission writing guides from the grey literature, 15,23 including in the Parliament of Australia's guide to making a submission to a committee inquiry.

While many of the features related to being clear and concise had few data points individually, the combination of all associated features highlights the overall importance of this category. This finding is further supported in the grey literature ^{15,23} which justifies the need to be clear and concise from the perspective of potentially time-poor policy staff and the ease with which key points can be identified and transferred into the final report. It is also conceivable that if a submission is not clear, less time will be spent trying to understand and progress it compared to a submission that is clear.

Convey authority

The second most common category of features was conveying the authority of both the authors of the submission and the supporting evidence. Providing a joint submission from multiple partners, using a professional tone, and framing the writer/organisation as socially responsible all contributed to conveying the authority of the submission authors. Citing expert support for recommendations (as perceived by the Inquiry staff), using a story or case study, providing an example of the recommendation being successful elsewhere, and generally using supporting evidence and referencing this all conveyed authority of the evidence.

The persuasiveness of stories has been identified in other research, which suggests that a narrative structure can evoke reader empathy.³⁴ Conveying authority may also reduce the reader's perceived risk of implementing a new strategy, particularly if working in a risk-averse environment.³

Only five joint submissions and four submissions that claimed expert support were analysed, so caution should be given to this interpretation. However, as this feature can be triangulated with the broader category of conveying authority and makes intuitive sense, we have included this finding. In addition, previous research has indicated that policymakers in America are more likely to classify evidence from experts as 'substantive' compared to evidence from lay members of the public.²⁸

Align the submission with the government agenda

A less common but potentially effective strategy was alignment with the government's agenda. Examples of this include: highlighting where submission content aligns with government policy; using evidence from government reports; and ensuring recommendations align with the Inquiry's ToR.

Figure 2: Key findings: influential features to include in a written submission, informed by the scoping review.

Key Findings: Influential features to include in a written submission

Be Clear and Concise

- Provide additional details via a link or reference to reduce clutter
- Summarise the main points early
- Make recommendations stand out from the surrounding text
- Use meaningful headings
- Use sub points that relate to the central issue
- Summarise core issues or positions in a quotable 1-2 sentences
- Number the pages

Convey Authority

- Provide a joint submission from multiple partners
- Claim expert support
- Claim public support
- Use a story or case study
- Reference information
- Use a professional tone
- Provide an example of the proposed recommendation being successful

Align the submission with the Government Agenda

- Use evidence from government reports
- Highlight where submission content aligns with government policy
- Ensure alignment with the Terms of Reference

While the explicit alignment of a submission to the government agenda was rare, this finding can be triangulated with previous research, which indicates that alignment with government views and ideology may strengthen government support, ^{7,26,32,33} and that policymakers are more likely to cite evidence from government reports compared to other forms of evidence provided in submissions.³¹ Framing a recommendation to align with government objectives is therefore a logical move for submission writers, where possible.

The preference for recommendations that align with the government agenda may also be a result of the composition of the Inquiry Committee, most of whom were members of the government in power, wanting to maintain consistency in the government approach.

While alignment with the government agenda was a category developed by merging multiple features from the literature, the use of evidence from non-government sources is also reflected positively in the results and should therefore not be disregarded. Advocates may consider using both types of evidence in submissions.

Limitations and opportunities

This study is based on one government inquiry and analysed only 19% of the publicly available submissions. The reliability of results for other inquiries and governments is therefore unknown until further research is conducted in other contexts. Further research on other inquiries not only within Australia but also internationally would

increase the reliability of the results. Additionally, an expanded data sample would enable the use of more advanced analysis.

The categorisation within this study was undertaken by one researcher in regular and detailed consultation with the research team. Future research would benefit from having two researchers independently extracting and coding data to reduce potential researcher bias and improve reliability.

Submission features tested in this study were limited to those identified through a scoping literature review. It is possible that due to the search strategy, which included only documents published in English, some relevant publications and influential features may have been missed. In addition, only literature relating to government inquiry submissions was captured. Therefore, not all features relating to influential writing as a general theme would have been captured. Future research may wish to expand the search strategy to capture these.

This research assessed the transfer of recommendations within submissions into the subsequent Inquiry report. Implementation of the inquiry report by the government or other stakeholders could not be assessed due to the lengthy process of policy implementation; however, this would be useful to examine in future research.

Due to the limitations of this study, the findings of this study should be interpreted as a consolidated list of considerations for people writing submissions rather than substantive evidence of their influence. Figure 2.

Conclusions

Writing a submission for a government inquiry is a popular strategy used by advocates to influence government policy. Empirical evidence on how to write influential submissions, however, is sparse. This study is a key step in providing guidance to advocates when writing submissions. Our analysis indicates that when writing a submission to a government inquiry, advocates should: 1) ensure their submission is clear and concise; 2) convey the authority of both the writer and supporting evidence; and 3) where possible, align the submission with the government agenda. Due to the limited research in this field, we encourage future research to test the framework of influential features on other inquiry topics and other countries to increase the reliability of results.

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Ethical statement

No ethics approval was sought or required, due to using publicly accessible information, without involvement of people outside of the research team.

Conflicts of interest

Adam Delaine works for the Australian Government Department of Health and Aged Care. However this paper is in no way affiliated with the Department's views or policies.

All other authors disclose no conflicts of interest.

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Appendix A Supplementary data

Supplementary data to this article can be found online at https://doi.org/10.1016/j.anzjph.2024.100133.