

## **9.6. Draft Community Engagement Policy**

Committee: Ordinary Council Meeting

Meeting Date: 24 August 2026

Report Author: Chelsie Butler

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### **RECOMMENDATION**

That Council:

- a. receive and note the outcomes of the public consultation undertaken on the draft Community Engagement Policy as provided in the Engagement Summary at Attachment 1; and
- b. revokes the Public Consultation Policy at Attachment 2; and
- c. adopt the Community Engagement Policy as provided at Attachment 3.

### **PURPOSE**

The purpose of this report is to present the outcomes of community consultation on the draft Community Engagement Policy, revoke the Public Consultation Policy, and seek Council's adoption of the Community Engagement Policy.

### **BACKGROUND**

On 11 December 2025, the Community Engagement Charter was published in the South Australian Government Gazette. Legislative amendments to the *Local Government Act 1999* (the Act) also commenced on this date, establishing a new community engagement framework for South Australian councils. Section 50A of the Act requires councils to prepare and adopt a Community Engagement Policy consistent with the Community Engagement Charter.

To meet these legislative requirements, Council developed a draft Community Engagement Policy to replace its existing Public Consultation Policy and align Council's community engagement practices with the principles and requirements of the Community Engagement Charter.

At its Ordinary Council Meeting held on 22 June 2026, Council endorsed the draft Community Engagement Policy for the purpose of public consultation as follows:

**OC2142026**

*Moved: Cr Stewart Burns*

*Seconded: Cr Nick McKenzie*

*That Council*

*a. endorses the draft Community Engagement Policy as provided at Attachment 2 for the purpose of public consultation in line with the Communication and Engagement Plan provided at Attachment 3; and*

*b. notes that a further report will be presented to Council with the engagement feedback prior to the adoption of the Community Engagement Policy.*

**CARRIED**

Public consultation was undertaken from 6 July 2026 to 27 July 2026 in accordance with the endorsed Community Engagement Plan.

**COMMENTARY**

Council promoted the public consultation through a public notice in the Fleurieu Sun, on Council's website and Your Say Victor Harbor, through social media and Victor Viewpoint and at the Civic Centre. Community members were able to provide feedback by completing the online survey or hard copy feedback form or by submitting a written submission.

During the consultation period, Council received six responses comprising four online survey responses, one hard copy feedback form and one written submission. The Your Say Victor Harbor webpage received 34 views and 16 downloads of the draft policy.

The detailed consultation outcomes are provided in the Community Engagement Summary as provided at Attachment 1

***Community Feedback***

Overall, feedback demonstrated general support for the draft Community Engagement Policy.

Of the five survey responses received, four respondents supported the draft policy and one respondent was unsure. Respondents generally considered the draft policy to be clear, well structured and a sensible framework for guiding community engagement.

Feedback identified opportunities to improve the promotion and visibility of consultation activities and the communication of the outcomes. Respondents also emphasised the importance of transparency and ensuring a broad range of people are encouraged to participate in Council's decision-making processes.

***Business Victor Harbor Submission***

Business Victor Harbor submitted feedback on behalf of its Board and members. The submission generally supported the intent of the draft policy and acknowledged a number of positive elements, including the tiered engagement framework, structured engagement process and accessibility provisions.

The submission recommended amendments relating to:

- direct notification of representative organisations when relevant consultation activities commence;
- expanding "closing the loop" provisions;
- discretionary community engagement provisions;
- recognition of businesses and interest groups;
- consultation outcome reporting; and
- stakeholder engagement practices.

Administration assessed each matter raised against the purpose and scope of the draft policy and the Community Engagement Charter.

Many matters raised by Business Victor Harbor relate to the design, promotion and delivery of individual consultation activities rather than the overarching policy framework. The Community Engagement Policy establishes Council's minimum legislative framework and minimum engagement requirements under the Act and the Community Engagement Charter, without prescribing every engagement technique, communication method or stakeholder notification process that may be used for individual consultations.

Operational matters will instead be addressed through Community Engagement Plans, prepared where required having regard to the nature, significance and impact of each project, proposal or decision. Plans may identify appropriate methods, communication channels, stakeholders and targeted engagement with businesses, representative organisations, community groups, affected landowners, government agencies and other stakeholders. Council or the Chief Executive Officer may approve additional engagement based on the significance of the matter, stakeholder interest, community impact and available resources.

A copy of Business Victor Harbor's submission is provided at Attachment 4.

Council has also implemented the Social Point community engagement platform, addressing several recommendations in the submission. Individuals, businesses and organisations can register their interests and receive notifications about relevant projects, updates and reports. This provides greater user control and equitable access to engagement opportunities. The platform's functionality will be managed through Community Engagement Plans and administrative processes rather than prescribed in the policy.

### ***Briefing Session***

At the Council Member briefing session on Monday, 17 August 2026, members considered the consultation feedback and the proposed amendments to the draft policy. It was the appetite of the Council Members to include the following amendments in response to the feedback received:

- Clause 5 - Definitions: 'Business Owners' has been added to the definitions of community and stakeholders. A definition of the community engagement toolkit has also been added.
- Clause 6.4 - Community Engagement Process: References to 'Significant - Annual Business Plan and Rating Policy, Significant and Standard' have been removed. Step 8 of the process has been renamed from 'Communicate Council's decision' to 'Closing the Loop'
- Clause 6.5 - Discretionary Community Engagement: 'Discretionary' has been removed from the second paragraph, and the paragraph stating that Council or the Chief Executive Officer is not obliged to consider or undertake additional consultation has been deleted.
- Clause 6.6.4 - Communications Team: A responsibility has been added to maintain a register of recognised representative and peak bodies and notify registered bodies directly when Council begins an engagement process relevant to their members.

These amendments directly respond to the consultation feedback by recognising businesses as community stakeholders, strengthening communication of consultation outcomes, clarifying provisions for additional engagement, and improving direct notification of representative bodies.

No further substantive amendments are recommended because the draft policy already:

- establishes a clear framework for community engagement;
- requires community feedback to be considered in decision-making;
- commits Council to communicating how community input influences outcomes;
- enables additional discretionary engagement where appropriate; and
- provides flexibility for engagement methods and stakeholder participation to be tailored through individual Community Engagement Plans.

### ***Next Steps and Recommendation***

Council must adopt the new Community Engagement Policy by 11 September 2026 to comply with statutory requirements. Although Council may continue to apply the current Public Consultation Policy until three months after adoption of the new policy or 10 December 2026, whichever occurs first. Having considered the consultation outcomes and incorporation of minor amendment outlined above, Administration recommends that Council adopts the draft Community Engagement Policy (with the recommended track changes) as provided at Attachment 3 and revokes the existing Public Consultation Policy as provided at Attachment 2.

As Council has no current community engagement activities requiring the existing policy, revoking the existing policy will provide a timely transition to the new legislative framework and avoid maintaining overlapping policies.

## **RISK ASSESSMENT**

The following risks have been assessed in line with Council's Risk Management Framework and Policy:

**Legal and Compliance** - Adoption of the Community Engagement Policy will support Council's compliance with section 50A of the Local Government Act 1999 and the Community Engagement Charter. This risk is assessed as **low**.

## **REFERENCES**

### **City of Victor Harbor Community Plan 2030**

Aspiration 6 - We are a financially sustainable and well-governed organisation

#### **Other references used:**

- Local Government Act 1999, section 50A - Community Engagement Policy.
- Community Engagement Charter

## **BUDGET IMPLICATIONS**

Excluding endorsed budgeted staff resources there are no budget implications in adopting the Community Engagement Policy.

No additional funds are required.

## **CONSULTATION**

Council Members at a Briefing Session held 15 June 2026 and 17 August 2026

Senior Management Team

Senior Governance Officer - Kyla Walker

Communications Officer - Cathy Williams

Business Victor Harbor at a Briefing Session held 17 August 2026

## **ATTACHMENTS**

Attachment 1 - Community Engagement Summary - Draft Community Engagement Policy

Attachment 2 - Public Consultation Policy (to be revoked)

Attachment 3 - Draft Community Engagement Policy (with track changes)

Attachment 4 - Business Victor Harbor's submission to the Draft Community Engagement Policy Consultation

**Attachment 1 - Community Engagement Summary - Community Engagement Policy**



# **Community Engagement Summary**

Draft Community Engagement Policy

Monday, 6 July 2026 to Monday, 27 July 2026 (inclusive)



## INTRODUCTION

On 11 December 2025, amendments to the *Local Government Act 1999* and the introduction of the Community Engagement Charter established a new framework for community engagement across South Australian councils. Section 50A of the Act requires councils to prepare and adopt a Community Engagement Policy consistent with the Community Engagement Charter.

In response, the City of Victor Harbor prepared a Draft Community Engagement Policy to replace the existing Public Consultation Policy. The draft policy sets out Council's commitments, statutory requirements, engagement categories and minimum standards for community engagement activities. It establishes a consistent framework for informing, consulting and involving the community in Council decision-making processes.

Public consultation was undertaken during July 2026 to provide community members, businesses and stakeholders with an opportunity to review the draft policy and provide feedback before it is considered for adoption by Council.

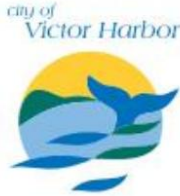
## CONSULTATION METHODOLOGY

Public consultation on the Draft Community Engagement Policy was conducted from Monday 6 July 2026 to Monday 27 July 2026. The opportunity for residents, ratepayers, businesses and stakeholders to provide feedback was promoted through the following engagement activities:

- **Posters and Information Sheets** displayed in Civic Centre
- **Public Notice** published in Fleurieu Sun on 2 July 2026
- **Victor Viewpoint newsletter** sent on 10 May 2026 (2,597 recipients, 25 article clicks)
- **Facebook posts** published on:
  - 7 July 2026 (2,123 views)
- **Instagram post** published on:
  - 7 July 2026 (185 views)



**Fleurieu Sun Public Notice – 2 July 2026**



### Have Your Say: Draft Community Engagement Policy

The City of Victor Harbor is updating how it engages with the community to align with the new Community Engagement Charter under the Local Government Act 1999.

The draft Community Engagement Policy sets out how and when Council will inform, consult and involve the community in its decisions.

The policy will be available for viewing online at [www.yoursay.victor.sa.gov.au](http://www.yoursay.victor.sa.gov.au) or in hard copy at the City of Victor Harbor Civic Centre (1 Bay Road, Victor Harbor) from Monday 6 July 2026.

You can provide your feedback:

- **Online** – [www.yoursay.victor.sa.gov.au](http://www.yoursay.victor.sa.gov.au)
- **In writing** – address your submission to the Chief Executive Officer as return via:
  - o Post to PO Box 11, Victor Harbor SA 5211
  - o Email to [localgov@victor.sa.gov.au](mailto:localgov@victor.sa.gov.au)
  - o Deliver in person to the City of Victor Harbor Civic Centre.

The consultation period will close at 5pm on Monday 27 July 2026.

For more information visit [www.yoursay.victor.sa.gov.au](http://www.yoursay.victor.sa.gov.au) or call (08) 8551 0500.

**Victoria MacKirdy, Chief Executive Officer**

07080523 LD 22-26



### Social Media Post – 7 July 2026





**Victor Viewpoint Newsletter – 10 July 2026**



## **Draft Community Engagement Policy**

**Council is seeking your feedback on its draft Community Engagement Policy.**

The policy, which will replace Council's current Public Consultation Policy, will set out how and when Council will inform, consult and involve the community in its decisions.

Learn more and share your thoughts by 5pm on Monday 27 July 2026.

**HAVE YOUR SAY**



Community members were able to provide feedback through:

- Your Say Victor Harbor online survey
- Written submissions to Council
- Hard copy feedback forms available from the Civic Centre

The consultation webpage on YourSay Victor Harbor received 34 views and generated four online survey responses. In addition, Council received one hard copy feedback form and one written submission, resulting in a total of six responses during the consultation period.

## COMMUNITY FEEDBACK

### Written submissions

Council received one written submission from Business Victor Harbor on behalf of its Board and members. The submission generally supported the intent of the draft policy and the introduction of the Community Engagement Charter framework. However, it also recommended a number of amendments to strengthen stakeholder engagement and reporting mechanisms.

Key recommendations included:

- Direct notification of representative organisations when relevant consultation activities commence.
- Expanding "closing the loop" provisions to all engagement categories.
- Reconsideration of wording relating to discretionary engagement activities.
- Explicit recognition of businesses, ratepayers and interest groups within the policy framework.
- Publication of consultation outcomes in a single accessible location

### Survey responses

A total of five survey responses were received during the consultation period, comprising four online survey responses and one hard copy survey.

#### **Q. What is your connection to Victor Harbor?**

All respondents described themselves as residents.

#### **Q. Have you read the Draft Community Engagement Policy?**

All respondents answered yes.

#### **Q. Do you support the draft Community Engagement Policy?**

Four respondents supported the draft policy, and one respondent was unsure.

Respondents generally considered the policy to provide a clear framework for community engagement and consultation. One respondent was unsure and suggested additional opportunities to promote consultation activities and strengthen community awareness.



**Q. Why do you/do you not support the draft Community Engagement Policy?**

Respondents who supported the policy described it as:

- Well thought out and clearly written.
- A sensible and fair approach to community engagement.
- A straightforward policy that clearly outlines Council's intentions.
- A framework that provides adequate notice and opportunity for public feedback.

The respondent who was unsure expressed the view that Council could do more to promote consultation opportunities and increase awareness of engagement activities across the community.

**Q. Do you have any other feedback on the draft Community Engagement Policy?**

Overall, respondents were supportive of the draft policy and considered it a positive framework for guiding Council's community engagement activities.

Feedback highlighted the importance of transparency, timely access to information and ensuring community members have meaningful opportunities to contribute to decisions that affect them.

One submission recommended strengthening stakeholder notification and reporting mechanisms, while another reflected on the ongoing value of community consultation and the need to keep residents informed and engaged in local government matters.

**Q. How do you rate the City of Victor Harbor's current approach to community engagement?**

- Two respondents rated Council's current approach as 5 out of 5
- One respondent rated Council's approach as 3 out of 5
- One respondent rated Council's approach as 2 out of 5
- One respondent did not provide a rating.

**Q. How could the City of Victor Harbor improve its community engagement?**

Feedback focused on increasing awareness of consultation opportunities, improving communication with the community and ensuring engagement activities are accessible to a broad range of people.

Respondents suggested additional promotion of consultation opportunities, providing information through multiple channels and continuing to demonstrate how community feedback influences Council decisions.

Feedback also highlighted the importance of maintaining opportunities for community members, businesses and stakeholder groups to participate in Council decision-making processes.



## CONCLUSION

Community consultation on the Draft Community Engagement Policy was undertaken from 6 July 2026 to 27 July 2026 in accordance with the requirements of the *Local Government Act 1999* and the Community Engagement Charter. A total of six responses were received, comprising four online survey responses, one hard copy feedback form and one written submission. The consultation webpage received 34 views during the engagement period.

Feedback received demonstrated general support for the draft Community Engagement Policy and its alignment with the new Community Engagement Charter. Respondents acknowledged the policy as a clear and structured framework for community engagement and consultation. Feedback also identified opportunities to further improve awareness of consultation opportunities, stakeholder engagement and communication of consultation outcomes.

Business Victor Harbor provided a detailed submission supporting the policy's intent while recommending several amendments relating to stakeholder notification, reporting consultation outcomes, discretionary engagement and the recognition of representative organisations.

Given the relatively small number of responses received, the feedback provides valuable insights from engaged community members and stakeholders but may not necessarily reflect the broader views of the community.

### Next Steps

The Communications and Governance team will review and consider all feedback received through the consultation process and determine whether any amendments to the draft policy are warranted.

A final draft of the Community Engagement Policy, together with this Community Engagement Summary and any recommended amendments will be presented to Council for consideration and adoption.

## APPENDIX 1

Received By  
28 JUL 2026  
City of Victor Harbor



FEEDBACK FORM

### Draft Community Engagement Policy

**Your Details**

|                                                                                                     |            |           |            |
|-----------------------------------------------------------------------------------------------------|------------|-----------|------------|
| First Name:                                                                                         | [REDACTED] | Surname:  | [REDACTED] |
| Residential Address:                                                                                | [REDACTED] |           |            |
| Residential Suburb:                                                                                 | [REDACTED] | Postcode: | 5211       |
| Email Address:                                                                                      | [REDACTED] |           |            |
| Add email address to Victor Viewpoint, Council's monthly e-newsletter? <input type="checkbox"/> Yes |            |           |            |

Please note: Feedback received during this consultation period may be made publicly available.

**What best describes you?**

☐ City of Victor Harbor Resident  
☒ City of Victor Harbor Ratepayer  
☐ Business  
☐ Visitor  
☐ Other (please specify: \_\_\_\_\_)

**Draft Community Engagement Policy**

**Have you read the draft Community Engagement Policy?**

☒ Yes ☐ No ☐ Unsure

**Do you support the draft Community Engagement Policy?**

☒ Yes ☐ No ☐ Unsure

**Why or why not?**

COUNCIL PAYS GOOD MONEY TO CONSULTANTS FOR SUCH THINGS. EVERYTHING IS MENTIONED IN GOOD FAITH. HOWEVER - I HAVE HAD EXPERIENCE FIGHTING AGAINST A COUNCIL & BEING A COUNCILLOR. THERE WILL ALWAYS BE SOME ONE OR SOMETHING TO CAUSE PROBLEMS & UPSET PEOPLE

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Do you have any other feedback on the draft Community Engagement Policy?

PEOPLE NEED TO KNOW WHAT IS GOING ON. IT IS HARD  
TO GAIN ANY INFORMATION & PEOPLE GET PISSED OFF  
IT WOULD BE BENEFICIAL TO HAVE A CONTACT FOR  
QUERIES.

Other Feedback

How do you rate the City of Victor Harbor's approach to community engagement?  
(1 = poor and 5 = excellent)



How could the City of Victor Harbor improve its community engagement?

PLANNING - NO ANSWERS RE WATER SUPPLY, SEWERAGE.  
TOO MANY ROS HELD UP FOR SUBDIVISIONS. PEOPLE NEED TO  
BE AWARE OF WHAT IS HAPPENING. SUGGEST IF POSSIBLE  
TO TRY OUT MONTHLY INFO NIGHT AT COUNCIL CHAMBERS  
OPEN TO ?'S, IDEAS & PROBLEMS.  
ENCLOSING COPY OF MY ESSAY FROM APRIL/MAY 1997  
COUNCIL & COMMUNITY FOR WHICH I WON \$500. THE  
POINTS MADE THEREIN ARE STILL RELEVANT TODAY.  
I ALSO ENGINEERED AS A COUNCILLOR, OPPOSITION TO TOXIC  
PUMP IN TWO WALL. WITH HELP FROM, SCHOOL KIDS & RESIDENTS.  
THIS WAS REFUSED. I HAVE VIDEO & VISUAL PROOF OF  
ALL THIS. I AM NOW OLDER BUT POINT OUT THAT EVERYONE  
NEEDS TO BE HEARD OR IMPART KNOWLEDGE  
Submissions should be returned before 5pm on Monday 27 July 2026 by post to PO Box 11, Victor Harbor SA  
5211; by email [localgov@victor.sa.gov.au](mailto:localgov@victor.sa.gov.au); or, at the Victor Harbor Civic Centre, 1 Bay Road, Victor Harbor.

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## Essay Competition Winners!

**L**ate last year Council & Community announced that it was running an essay competition. In this issue we will be announcing the winners and printing extracts from winning entries. Unfortunately, due to space restrictions, it is not possible to publish each winning essay in its entirety.

Taking out the First Prize of \$500 is Bernice Pratt with her challenging

and thought provoking essay, "Council Encounter".

The Second Prize of \$200 has been awarded to Betty Preston for her essay documenting the hard battles fought by Councillors for residents in South Australia in the early years.

Third Prize of \$100 has been awarded to Andrew Young for his essay which explores the preservation of old heritage buildings and their facades in local areas.

Essays were judged on originality of thought, relevance to Local Government, and clear and concise prose. All judging decisions are final and no discussions will be entered into.

Views expressed in the essays or extracts from essays that are published in "Council & Community" are not necessarily the views of the Local Government Association.

## "Council Encounter"

**Bernice Pratt**, in her essay that won first prize in the "Council and Community" Essay Competition, highlights communication and consultation issues in Local Government.

**T**here had never been reason to give much thought to Council. Rates were paid and that was that. The roads were awful but the choice had been made to move to a more rural area for freedom. It had been a good choice. It was hard battling strong winds and seeing new trees die but gradually the chosen few battled on, growing into good sturdy specimens though bent by the ever present elements.

From a ploughed paddock a dream was emerging. The house settled lower as the trees grew up around it. It was becoming a private place, a place to feel free, to walk, enjoy and to say "This is ours".

Never in wildest dreams had owning an hectare of land and planning a home been envisaged. But at last the dream had become a reality.

It was interesting to watch surveyors on the land opposite and to speculate on what was happening. Maybe there was a sub-division planned. No hint of clouds on the horizon, just elation at the thought that other people would soon share the experience and excitement of building a house and making things change. Share the joy, fight the winds, laugh at the dust and heat.

A notification in a local paper confirmed that there was indeed to be a sub-division. Zoning was checked and with no other problems foreseen, no objection was made to the land division. Everything seemed all right. The farmer erected fences around each block. Soon there would be neighbours.



**"One thing emerging from this is the fact that people are starting to ask questions about the way things are being done."**

The farmer then notified us that a storm-water drain would come from his sub-division, through between our land and a neighbour's. This would enable him to gain an extra five allotments.

Many phone calls later and a few answers emerged. A 20 metre wide drain was proposed to run between the two blocks. Ten feet from the side of the house was correct. It would only be an easement and could be used by the owners who would also be liable for keeping it clear of weeds and debris. Council could come onto

an easement at any time without notice. Compensation might be paid for trees but not for four years of hard work and for water used. There would be no guarantee against future damage to the house which was to be three metres from the edge of the drain. It was to be understood that all this was for the good of the community and in the name of progress.

A letter objecting to this proposal was sent to Council, but was not put on a Council Meeting Agenda for three months.

It was later found that a large number of subdivisions had been rushed through council prior to this letter being tabled.

Finally it was made known that Council was considering sub-dividing an area of 55 square kilometres and that a proposed drainage scheme would enable this to go ahead. It was proposed that for each two acre block sold, the developers would pay Council \$1,000 and this would go toward paying for the drainage study and then for actual drainage scheme itself.

Apparently the dream home stood in the way of this and it and others like it were under threat.

It was also confirmed that a large part of the area was an actual flood plain and had been inundated many times in the past. Most of the already approved sub-division was also situated on this flood plain. It appeared however that the drainage scheme was for local storm water only and

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would in no way alleviate widespread flooding from the river.

It was said that sub-dividers had the right to make money and petty minded people should not stand in the way of progress.

Council was asked to make these developments publicly known but this request was refused. The reason given was that things had not yet been finally decided and therefore decisions could not yet be made or information made available to ratepayers.

By now more people had become aware of something happening in the area. Fences sprouted bits of pink ribbon and surveyors furtively popped up here and there. No notice was given of intention to survey, many properties were entered without the knowledge of the owner and when challenged, it was found that the surveyors carried no authority with them. In many cases they also gave misleading information as to the purpose of their work.

At this time a small group of concerned people, all in some way affected by the proposed drainage scheme, formed an association. If a fight was in the making it was to be done legally.

New facts came to light. It was learnt that Council had been advised that they had no obligation to inform prospective land owners of flood risk unless specifically asked.

Once sub-divisions were approved, all other land in the area would be valued on its sub-divisional potential, thereby forcing people with larger parcels of land to sell out. One



**"People are becoming more informed and sharing their knowledge."**

Councillor remarking that everyone had their price.

If money from \$1,000 per block subsidy was jeopardised in any way Council would raise the rates of all people in that area.

It appeared also that six sub-divisions of 152 allotments had been approved the month before Council elections — all of these used the approval of the farmer's land opposite as an example of enabling division to go ahead without a storm water drainage outlet.

The newly formed association called a public meeting a week after its inception. A large number of people attended and learnt for the first time

of the proposed drainage scheme. Council stated that they had no information to give but said they might hold a meeting when all facts were known. This electors' meeting was eventually reluctantly called seven months later.

There followed many letters to Government departments and advice from various sources on how to proceed. Then the Department of Environment and Planning called for a "freeze" on sub-division in the area. This was in effect closing the stable door after the horse had bolted due to the large number of sub-divisions which had already been rushed through council during the month prior to council elections. It was now easy to understand why this was done.

In actual fact one person running for Council, had at that time no idea of the proposed drainage scheme or the fact that a drain might bisect their property and pass over the natural gas pipeline also on that same land.

Many months later Council informed that it had approved the whole scheme six months earlier than the elections. Then three months after that it decided that it hadn't yet approved the drainage scheme. Was it any wonder that people in the area were confused.

Once the "freeze" or Section 50 was in effect it was believed, by residents, that Council would now have a breathing space in which to consider its actions and perhaps to proceed more slowly and with more common sense. It was hoped that now Council would try and give the public some idea of what was happening and also give ratepayers some input.

At last an electors' meeting was called. Plans of the drainage scheme had been on show for interested people for two weeks prior to the meeting and received mixed reactions. Few people agreed that the plan was feasible and many people were horrified on learning of huge open drains running for over 40 kilometres through the whole area. All were concerned at the enormous cost.

When this latest plan was on display it was found that the drain designed to run near the house had been "moved" to pass through the other side of the block and through the land of four other neighbours.

At the meeting, Council's consulting engineers gave details of the scheme. Originally it had been estimated that the whole scheme would cost \$2 million but now people were told that

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and call**

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for fine food prepared with flair  
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Christies Beach.

We will come to you wherever  
you are in South Australia.



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the estimated cost was \$5.6 million and that this could be exceeded. This cost was to be met by developers' contributions of \$1,000 per block. The question was asked that if 2,000 blocks were proposed, this would only bring in \$2 million dollars which fell far short of the amount required. This question was not answered as was the case with many more.

One outcome of that meeting was that people who had a proposed drain on their property could make an appointment to see the council engineer and someone from the engineering firm responsible for drawing up the drainage plans.

A month later, appointments having been made, approximately 20 people were able to query developments on their properties. This was by no means the whole number of people affected but the engineer was only available for one day during office hours. It was not possible for many people to attend due to work commitments.

At this time some people were told that drain routes could be changed and that their comments would be reported back to Councillors.

It was later denied that anything had been said about changing mapping of the drains. No report was made to Council until seven months later and then only after questions on notice from ratepayers had been asked through a Councillor.

People continued asking questions of Council but now the excuse for not answering was that they had to wait until a new Supplementary Development Plan was made. Council could do nothing until the Department of Environment and Planning gave back Planning control.

However on querying this of the Department, the information received was that drains had nothing at all to do with sub-division, that drains would not be considered in any planning done by the Department and that this was entirely Council's responsibility.

The "freeze" had now been in force for nearly 11 months. Rumours were that the Department of Environment and Planning was finding the whole situation too hard to resolve and would soon hand the whole mess back to Council.

Many residents were now more well informed but not by anything the Council had done. One lesson from all this is an insight into how a Council run their affairs, how things can be

covered up and how answering questions can be avoided.

It has been learnt how easy it is to avoid bringing certain matters before a General Council Meeting by dealing with them under a different committee. It has been learnt how to keep the gallery at a meeting uninformed by selling them an expensive agenda but keeping back all relevant plans etc. causing wonder that the agendas have anything in common with the ones given to Councillors.

It has been learnt that when anything comes up that Council wish to withhold from the public gallery, it is easy to exclude the public by making the matter confidential.

It has also been learnt that conflict of interest has no meaning at all and there can be "goings on" between prospective developers and council members.

It has been seen that where a drain is proposed to run through a developer's own house block, it will be through an 18 inch underground pipe but if it is decided to run it through his next door neighbour's block, it will be 65 feet wide and take a third of the total block.

It has been learnt just how inept a Council can be, how easy it is for one or two Councillors to sway the others and just how lacking in experience and knowledge these people are, though not through their own fault but by their very lack of expertise in certain fields.

It is realised that many people see running for Council as "something to do" after retiring, as a stepping stone for higher ambition or just because no one else could be bothered.

It is seen just how much power these people have over the lives of everything in an area. Yet it is also seen how little importance is given to council elections or to who gets in.

It shows the remarkable apathy everyone shares in what happens around them. It proves that more expertise is needed and more help and advice from Government in running of Councils.

It has been seen that recommendations from various Government Departments to Council can be totally ignored and shows that when a Council does try to act responsibly, their decision can be over-ruled by an Appeal. It seems to be totally a no-win situation for everyone.

It is also clear that many more

women should be encouraged to participate in Council affairs as there seems to be a great need for a more commonsense and level-headed approach to Council matters.

With things quiet on the drain fight, council are now turning their thoughts to another ambitious scheme to cost over \$3 million. But they assure, the drains are still "on".

One question must be asked and hopefully someone can give a sensible answer. How does a Council with a very limited number of ratepayers, envisage paying for a \$5.6 million (could get dearer) drainage scheme and a new \$3 million (could get to \$8 million) scheme? If someone can work this out surely the whole country could be saved. Maybe this Council has the answers — but why then will they not share them with their nearest and dearest — the ratepayers!

**STOP PRESS:** A new Supplementary Development Plan has now been gazetted. Copies have been obtained and people notified and the matter discussed in the most recent council meeting.

The most important thing about the Plan is that no further sub-division will be allowed on the flood-plain. It informs that flood plain mapping is proceeding in nearby Council areas which may in the future lead to less damage to person or property in a time of flood. This can only be good.

The S.D.P. however has certain stipulations, one being a prohibition on land fill. This could mean that all those people who have unknowingly built on the flood plain and have not been advised by Council to build higher foundations, could be inundated but may not be allowed to build levee banks for protection.

So it seems the battle is still ongoing. One small victory for the ordinary man but another looming on the horizon. The problem of drainage remains. The fact that developers will be encouraged and the rights of smaller established landowners ignored much less given voice.

One thing emerging from this is the fact that people are starting to ask questions about the way things are being done. People are becoming more informed and sharing their knowledge. Therefore it would benefit Governments and in no less degree, Councils to give more consideration for the feelings and rights of the — till now — silent majority.



**From:** "Your Say Victor Harbor" <noreply@socialpinpoint.com>  
**Sent:** Fri, 10 Jul 2026 10:44:04 +0930  
**To:** "City of Victor Harbor" <localgov@victor.sa.gov.au>  
**Subject:** Survey: Community Engagement Policy Form Submission



## Survey: Community Engagement Policy Form Submission

There has been a submission of the form Survey: Community Engagement Policy through your Your Say Victor Harbor website.

**Your Name**

[REDACTED]

**Your Address**

[REDACTED]

**What best describes you?**

City of Victor Harbor Ratepayer

**Your Email**

[REDACTED]

Document Set ID: 10587942  
Version: 1, Version Date: 10/07/2026



---

**Have you read the draft Community Engagement Policy?**

Yes

**Do you support the draft Community Engagement Policy?**

Unsure

**Why or why not?**

The council does not do enough to inform residents and rate payers on their plans and consultation opportunities. I see no improvement to that in this draft policy. There is also no information on process for informing participants on the outcomes of consultation.

**Do you have any other feedback on the draft Community Engagement Policy?**

Need to promote opportunities for consultation. Put information in letterboxes to get it directly to people. Send out text messages regarding consultation. Run phone call surveys. Hold community meetings when people working 9-5 can actually attend (not in the middle of a week day). It would also be good if the council welcomed suggestions from the community on what the community actually wants and/or needs rather than only presenting consultation opportunities with externally formed ideas.

**How do you rate the City of Victor Harbor's approach to community engagement? (1 = poor and 5 = excellent)**

2

**How could the City of Victor Harbor improve its community engagement?**

As above, community engagement is not promoted sufficiently and people do not know there are consultations occurring.



**From:** "Your Say Victor Harbor" <noreply@socialpinpoint.com>  
**Sent:** Wed, 8 Jul 2026 20:07:05 +0930  
**To:** "City of Victor Harbor" <localgov@victor.sa.gov.au>  
**Subject:** Survey: Community Engagement Policy Form Submission



## Survey: Community Engagement Policy Form Submission

There has been a submission of the form Survey: Community Engagement Policy through your Your Say Victor Harbor website.

**Your Name**

[REDACTED]

**Your Address**

[REDACTED]

**What best describes you?**

City of Victor Harbor Ratepayer

**Your Email**

[REDACTED]

Document Set ID: 10586974  
Version: 1, Version Date: 09/07/2026



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**Have you read the draft Community Engagement Policy?**

Yes

**Do you support the draft Community Engagement Policy?**

Yes

**Why or why not?**

It appears to be very well thought out and clearly written

**Do you have any other feedback on the draft Community Engagement Policy?**

It's a very sensible plan

**How do you rate the City of Victor Harbor's approach to community engagement? (1 = poor and 5 = excellent)**

5

**How could the City of Victor Harbor improve its community engagement?**

I'm sorry, I don't have any good suggestions. I think it's easy for people who want to engage to get information. But unfortunately many people I talk with don't want to take time to read the information that's available.



**From:** "Your Say Victor Harbor" <noreply@socialpinpoint.com>  
**Sent:** Tue, 7 Jul 2026 20:11:04 +0930  
**To:** "City of Victor Harbor" <localgov@victor.sa.gov.au>  
**Subject:** Survey: Community Engagement Policy Form Submission



## Survey: Community Engagement Policy Form Submission

There has been a submission of the form Survey: Community Engagement Policy through your Your Say Victor Harbor website.

**Your Name**

[REDACTED]

**Your Address**

[REDACTED]

**What best describes you?**

City of Victor Harbor Resident

**Your Email**

[REDACTED]

Document Set ID: 10586117  
Version: 1, Version Date: 08/07/2026



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**Add your email to Council's monthly email newsletter, Victor Viewpoint?**

Yes

**Have you read the draft Community Engagement Policy?**

Yes

**Do you support the draft Community Engagement Policy?**

Yes

**Why or why not?**

Pretty straightforward and outlines council intent

**Do you have any other feedback on the draft Community Engagement Policy?**

There doesn't seem to be any allowance for topics that may arise that are not pre-emptive. I.e Over abundant native species / Fairy Penguin management / development in rural settings that have impacts further than direct neighbours. For example.

**How do you rate the City of Victor Harbor's approach to community engagement? (1 = poor and 5 = excellent)**

3

**How could the City of Victor Harbor improve its community engagement?**

Be more transparent- involve and invite people into conversations who may have been overlooked in the past, generally it would seem the same people are invited to the same 'topic' discussions- where there is a much broader and knowledgeable audience who could and can contribute meaningfully.



**From:** "Your Say Victor Harbor" <noreply@socialpinpoint.com>  
**Sent:** Tue, 7 Jul 2026 16:52:19 +0930  
**To:** "City of Victor Harbor" <localgov@victor.sa.gov.au>  
**Subject:** Survey: Community Engagement Policy Form Submission



## Survey: Community Engagement Policy Form Submission

There has been a submission of the form Survey: Community Engagement Policy through your Your Say Victor Harbor website.

**Your Name**

[REDACTED]

**Your Address**

[REDACTED]

**What best describes you?**

City of Victor Harbor Resident

**Your Email**

[REDACTED]

Document Set ID: 10585912  
Version: 1, Version Date: 07/07/2026



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**Add your email to Council's monthly email newsletter, Victor Viewpoint?**

Yes

**Have you read the draft Community Engagement Policy?**

Yes

**Do you support the draft Community Engagement Policy?**

Yes

**Why or why not?**

It looks thorough and fair, providing plenty of notice for feedback.

**Do you have any other feedback on the draft Community Engagement Policy?**

No

**How do you rate the City of Victor Harbor's approach to community engagement? (1 = poor and 5 = excellent)**

5

**How could the City of Victor Harbor improve its community engagement?**

I think the current policy works fine. If people want to engage, they will find a way to do so.

## Attachment 2 – Public Consultation Policy (to be revoked)



# POLICY

## Public Consultation Policy

|                                 |                                                                                                                                                                                                                                                                                                                    |
|---------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Policy Category:</b>         | Statutory Policies and Codes                                                                                                                                                                                                                                                                                       |
| <b>Department / Officer</b>     | Governance/Chief Executive Officer                                                                                                                                                                                                                                                                                 |
| <b>Date Adopted</b>             | 26 April 2000                                                                                                                                                                                                                                                                                                      |
| <b>Date/s Reviewed</b>          | June 2001; May 2002, July 2003, June 2004, November 2005, November 2007, 18 October 2010, 17 December 2012; 27 May 2019; <b>27 April 2020</b> ; 22 June 2022 (OC2952020)                                                                                                                                           |
| <b>Review Frequency</b>         | As required and at least biennially                                                                                                                                                                                                                                                                                |
| <b>Strategic Plan Reference</b> | Requirement under Section 50 of the Local Government Act; Community Plan & Strategic Direction 2016-2020 – Objective 5 An innovative Council empowering the community, Approach 5.2 Encourage active citizenship and community pride, 5.2.4 Engage with the broader community to seek their views and expectations |

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### 1. Purpose

The purpose of this policy is to contribute to a culture of effective community engagement, to enhance decision making and ensure that Council meets its obligations under the *Local Government Act 1999* (the Act) and other relevant Acts.

This Policy outlines the minimum communication and consultation requirements under the Act that Council is required to comply with.

Council's Community Engagement Toolkit is designed to further contribute to effective engagement, by providing guidelines, structure and process that ensures consistent, meaningful and effective community engagement is achieved, beyond the requirements of the Act.

### 2. Scope

This policy will apply to public consultation processes required or undertaken under the *Local Government Act 1999*.

It is not intended that this policy replace Council's consultation requirements under other legislation, e.g. Development Act 1993 or Planning, Development and Infrastructure Act 2017.

### 3. Policy Statement (Summary)

The City of Victor Harbor is committed to open, accountable and responsive decision making achieved by effective communication and consultation between Council and the community.

Council has developed and is committed to five principles that underpin its approach to community engagement:

#### 1. Community Participation

We are committed to including, informing and involving our community in local decision making from project planning through to delivery.

#### 2. Open and Accountable

We will provide clear and easy to understand information that will inform our community and encourage meaningful engagement.

#### 3. Accessibility

Our community will be able to access information in a variety of ways.

#### 4. Careful Planning and Evaluation

We will carefully plan community engagement activities and evaluate all feedback to meet the needs of our community.

#### 5. Closing the Loop

We will inform our community of our decisions and outline how feedback was considered.

This policy draws on the International Association for Public Participation's engagement spectrum, which the council has adapted to fit our local context and expectations. The levels of community engagement include:

- **Informing** – one-way communication providing balanced and objective information to assist understanding about something that is going to happen or has happened.
- **Consulting** – two-way communication designed to obtain public feedback on a proposal, initiative or issue to inform Council decision making.
- **Active Participation** – Ongoing communication, where community members and Council are working together to ensure concerns and aspirations are understood. While the decision ultimately rests with Council, the community is involved in identifying alternatives and preferred solutions. This may also include involving the community in the development of proposals and options.

Where the Local Government Act prescribes that public consultation is necessary, Council will obtain and consider community contributions and relevant information to ensure that any decision made is in the best interests of the community. However, it is important to note that having taken into account the submissions received, any final decision rests with Council.

### 4. Legislation and Compliance

Section 8 of the Act (Principles to be observed by a council) outlines, amongst other things, Council's responsibilities to provide open, responsive and accountable government.

#### Public Consultation Policy

More specifically, Section 50 requires Council to prepare and adopt a public consultation policy that sets out the steps that the Council must follow in cases where the Act requires that a council must follow its public consultation policy, to ensure it effectively consults with stakeholders and the community.

The Act prescribes the requirement for public consultation in numerous provisions of the Act. **Section 6** of this Policy lists the sections that specify when public consultation is required under the Act, and the consultation steps that need to be taken relevant to each section. Where the Act specifies that Council needs 'to follow the relevant steps set out in its public consultation policy', Council will follow the steps indicated in the relevant column. Where deemed appropriate by the Administration, or requested by Council, further public consultation may be undertaken that exceeds the requirements prescribed by the Act.

## 5. Definitions

The terms below are defined as:

**The Act** is the Local Government Act 1999 (SA).

**Public or Community** includes individuals or groups who have an interest in Council's decision-making and who are affected by Council decisions. These individuals or groups may be identified as residents and voters, ratepayers, business owners, Council customers, contractors and suppliers, community interest groups, agencies and hard to reach groups.

**Engagement** describes varying levels of participation in public consultation processes.

**Public Consultation** is a planned process of engagement where information is provided, and community and stakeholders are formally invited, as per the relevant requirements in the Act, to comment about matters on which Council will deliberate.

**Public Consultation Policy**

## **6. Policy Content**

The following table outlines Council's legislative requirements under the Local Government Act 1999.

**Legend:**

1. Carrying out representation reviews (Section 12(5))
2. Considering change of status of council or name change (section 13)
3. Determining the manner, places and times of its principal office (section 45)
4. Adopting or varying a public consultation policy (section 50)
5. Altering the Code of Practice relating to the principles, policies and procedures that council will apply to enable public access to Council and Committee Meetings, their minutes and release of documents (section 92)
6. Strategic Management Plans (Section 122)
7. Council's Annual Business Plan (section 123)
8. Changing or amending council's rating policy (section 151)
9. Basis of differential rates (section 156)
10. Excluding land from classification as community land (section 193)
11. Revoking the classification as community land (section 194)
12. Adopting, amending or revoking a management plan for community land (section 197)
13. Amendment or revocation of a management plan<sup>1</sup> (section 198)
14. Alienating of community land where the management plan does not allow it<sup>2</sup> (section 202)
15. Alienating roads (section 223)
16. Planting vegetation where it will have a significant impact on residents, the proprietors, or nearby residents<sup>3</sup> (section 232)
17. Making bylaws (section 249)
18. Making orders (section 259)

<sup>1</sup>Public consultation is not required unless the amendment has no impact or no significant impact on the interests of the community.

<sup>2</sup>Public consultation is not required if the grant of a lease or licence is authorised in an approved management plan for the land and the term is five (5) years or less; or the regulations provide for an exemption from compliance with the public consultation policy.

<sup>3</sup>Public consultation is only required if the Council considers that the vegetation may have a significant impact on residents, the proprietors of nearby businesses or advertisers in the area.

## Public Consultation Policy

| Consultation steps                                                                                      | 1. Carrying out representation reviews (section 12(5)) | 2. Considering change of status of council or name change (section 13) | 3. Determining the manner, places and times of its principal office (section 45) | 4. Adopting or varying a public consultation policy (section 50) | 5. Code of Practice for Access to meetings, their minutes and release of documents (Section 92) | 6. Strategic Management Plans (Section 122) | 7. Annual Business Plan (Section 123) | 8. Rating Policy (Section 151) | 9. Basis of Differential Rates (Section 156) | 10. Excluding land from classification as community land (section 193) | 11. Revoking the classification as community land (section 194) | 12. Adopting, amending or revoking a management plan for community land (section 197) | 13. Amendment or revocation of a management plan (section 198) | 14. Alienating of community land where the management plan does not allow it (section 202) | 15. Alienating roads (section 223) | 16. Planting vegetation (section 232) | 17. Making bylaws (section 249) | 18. Making orders (section 259) |
|---------------------------------------------------------------------------------------------------------|--------------------------------------------------------|------------------------------------------------------------------------|----------------------------------------------------------------------------------|------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|---------------------------------------------|---------------------------------------|--------------------------------|----------------------------------------------|------------------------------------------------------------------------|-----------------------------------------------------------------|---------------------------------------------------------------------------------------|----------------------------------------------------------------|--------------------------------------------------------------------------------------------|------------------------------------|---------------------------------------|---------------------------------|---------------------------------|
| Council will provide public notice of the options for consideration                                     | ✓                                                      |                                                                        | ✓                                                                                | ✓                                                                | ✓                                                                                               | ✓                                           | ✓                                     | ✓                              | ✓                                            | ✓                                                                      | ✓                                                               | ✓                                                                                     | ✓                                                              | ✓                                                                                          |                                    | ✓                                     | ✓                               | ✓                               |
| Information provided on a City of Victor Harbor website                                                 | ✓                                                      | ✓                                                                      |                                                                                  | ✓                                                                | ✓                                                                                               | ✓                                           | ✓                                     | ✓                              | ✓                                            | ✓                                                                      | ✓                                                               | ✓                                                                                     | ✓                                                              | ✓                                                                                          | ✓                                  | ✓                                     | ✓                               | ✓                               |
| Information is available for viewing at the Civic Centre                                                | ✓                                                      | ✓                                                                      |                                                                                  | ✓                                                                | ✓                                                                                               | ✓                                           | ✓                                     |                                | ✓                                            | ✓                                                                      | ✓                                                               | ✓                                                                                     | ✓                                                              | ✓                                                                                          | ✓                                  | ✓                                     | ✓                               | ✓                               |
| Notice is published in a local newspaper (The Times) circulating the City of Victor Harbor council area | ✓                                                      | ✓                                                                      | ✓                                                                                | ✓                                                                | ✓                                                                                               | ✓                                           | ✓                                     | ✓                              | ✓                                            | ✓                                                                      | ✓                                                               | ✓                                                                                     | ✓                                                              | ✓                                                                                          | ✓                                  | ✓                                     | ✓                               | ✓                               |
| Provide a minimum of 21 days for people to make submissions to council (unless otherwise stated)        | 6 weeks                                                | 3 weeks                                                                | 6 weeks                                                                          | ✓                                                                | 1 month                                                                                         | ✓                                           | ✓                                     | ✓                              | ✓                                            | ✓                                                                      | ✓                                                               | ✓                                                                                     | ✓                                                              | ✓                                                                                          | ✓                                  | ✓                                     | ✓                               | ✓                               |
| Receipt of submissions by City of Victor Harbor                                                         | ✓                                                      | ✓                                                                      | ✓                                                                                | ✓                                                                | ✓                                                                                               | ✓                                           | ✓                                     | ✓                              | ✓                                            | ✓                                                                      | ✓                                                               | ✓                                                                                     | ✓                                                              | ✓                                                                                          | ✓                                  | ✓                                     | ✓                               | ✓                               |
| Submissions to be considered by council in decision making                                              | ✓                                                      | ✓                                                                      | ✓                                                                                | ✓                                                                | ✓                                                                                               | ✓                                           | ✓                                     | ✓                              | ✓                                            | ✓                                                                      | ✓                                                               | ✓                                                                                     | ✓                                                              | ✓                                                                                          |                                    | ✓                                     | ✓                               | ✓                               |
| Inform public of outcome                                                                                | ✓                                                      | ✓                                                                      |                                                                                  | ✓                                                                | ✓                                                                                               | ✓                                           | ✓                                     | ✓                              | ✓                                            | ✓                                                                      | ✓                                                               | ✓                                                                                     | ✓                                                              | ✓                                                                                          |                                    | ✓                                     | ✓                               | ✓                               |
| Public meeting (as determined by legislation)                                                           |                                                        |                                                                        |                                                                                  |                                                                  |                                                                                                 |                                             | ✓                                     | ✓                              | ✓                                            | ✓                                                                      |                                                                 |                                                                                       |                                                                |                                                                                            |                                    |                                       |                                 |                                 |
| Provide opportunity for people to attend a Council meeting or Council Committee meeting                 | ✓                                                      | ✓                                                                      | ✓                                                                                |                                                                  |                                                                                                 |                                             | ✓                                     |                                |                                              |                                                                        |                                                                 |                                                                                       |                                                                |                                                                                            |                                    |                                       |                                 |                                 |
| Submit report and proposal/other to Minister or Government Department as required                       | ✓                                                      | ✓                                                                      |                                                                                  |                                                                  |                                                                                                 |                                             |                                       |                                |                                              |                                                                        |                                                                 | ✓                                                                                     |                                                                |                                                                                            |                                    |                                       |                                 |                                 |
| Give written notice to agencies that are under regulations to be notified of the proposal               |                                                        |                                                                        |                                                                                  |                                                                  |                                                                                                 |                                             |                                       |                                |                                              |                                                                        |                                                                 |                                                                                       |                                                                |                                                                                            | ✓                                  |                                       |                                 |                                 |

**Public Consultation Policy**

**7. Implementation/Delegations**

This Policy applies to Elected Members, staff, contractors and agents or consultants acting on behalf of Council.

Council is the elected body charged with responsibility for making decisions on behalf of the community. Under certain circumstances Council may delegate decision-making to Council officers.

The Chief Executive Officer supported by staff and/or external contractors, is responsible for implementing and reviewing this Policy, and reporting outcomes of consultations and review(s) of this Policy to Council.

Directors are responsible for ensuring their staff comply with this Policy and make use of the support mechanisms and tools provided to guide implementation.

The Communications Officer is responsible for providing advice and assistance to the community and stakeholders internal and external to City of Victor Harbor and keeping this policy and tools up to date, visible and readily accessible.

**8. Related Documents**

Community Engagement Toolkit

**9. Availability of Policy**

This policy is available on Council's website at [www.victor.sa.gov.au](http://www.victor.sa.gov.au). It may also be inspected or purchased at the Principal Office of the Council at 1 Bay Road, Victor Harbor.

## Attachment 3 – Draft Community Engagement Policy (with track changes)



# POLICY

|                          |                                                                                                                                                                             |
|--------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Policy Name              | Community Engagement Policy                                                                                                                                                 |
| Policy Category          | Statutory                                                                                                                                                                   |
| Department / Officer     | Office of the Chief Executive Officer / Strategy and Engagement Business Partner                                                                                            |
| Date Adopted             |                                                                                                                                                                             |
| Date/s Reviewed          |                                                                                                                                                                             |
| Review Frequency         | Every Three years or as required                                                                                                                                            |
| Strategic Plan Reference | Aspiration 6: We are a financially sustainable and well-governed organisation<br>6.2 Ensure our community is well informed and has opportunities to inform decision making. |
| Attachments              |                                                                                                                                                                             |

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### 1. Purpose

The purpose of this policy is to set out how the City of Victor Harbor will undertake community engagement in accordance with Sections 50 and 50A of the *Local Government Act 1999* and the Community Engagement Charter. This Policy will provide a clear and consistent approach for informing, involving and consulting with the community to support transparent and accountable Council decision-making.

### 2. Scope

This Policy applies to all statutory community engagement activities undertaken by Council in accordance with the *Local Government Act 1999* and the Community Engagement Charter. It is to be used by Council Members, employees, contractors and volunteers involved in the planning, delivery or evaluation of community engagement.

This Policy does not apply to processes governed by the *Planning, Development and Infrastructure Act 2016 (PDI Act)*, which is subject to the Community Engagement Charter and legislative requirements under the PDI Act.

### 3. Policy Statement (Summary)

The City of Victor Harbor is committed to delivering community engagement that is meaningful, inclusive, timely and proportionate to the significance and impact of decisions. Council will provide reasonable opportunities for community members to:

- Access clear and accurate information about proposed decisions
- Participate in engagement processes appropriate to the scope and impact of the matter

#### Community Engagement Policy

- Provide feedback that is genuinely considered in decision-making

Council will clearly communicate:

- What is proposed and the purpose of the proposal
- How community feedback will inform decision making
- How community input influenced the final outcome

Engagement activities will support constructive dialogue and be accessible to diverse community.

#### 4. Legislation and Compliance

Section 50A of the *Local Government Act 1999*, requires Council to adopt a Community Engagement Policy and this policy must be consistent with the Community Engagement Charter which is established by the Minister for Local Government under Section 50 of the *Local Government Act 1999*.

#### 5. Definitions

**Act** means the *Local Government Act 1999*.

**Charter** means the Minister for Local Government's Community Engagement Charter published in the South Australian Gazette on 11 December 2025.

**Communications Team** means the Communication Officer and Strategy and Engagement Business Partner.

**Community** means business owners and people who live, work, study, visit or do business in the City of Victor Harbor, and any stakeholders that may be affected by council decision/s.

**Community Engagement** means the process of seeking input or feedback from the community regarding a decision that may affect them. This includes any activity where council provides information on a decision or invites comments on a matter. For the purpose of this policy, community engagement and public consultation mean the same.

**Community engagement toolkit** means various tools designed to assist the staff and external consultants engaged by Council to implement community engagement. It provides a step-by-step guide to planning, promoting, delivering and reporting on community engagement activities.

**Public consultation** means the same as Community Engagement.

**Senior Management Team** means Chief Executive Officer, Director Corporate and Customer Service, Director Community and Development, Director Environment and Infrastructure and Group Manager Governance and Finance.

**Stakeholders** mean business owners, individuals or organised groups who have an interest in Council's decision-making and who are affected by council's decisions.

**Submissions** mean contributions made by members of the community and stakeholders, expressing an opinion in writing (including on Council's community engagement website) relating to a matter and/or proposal which will be considered in council's decision-making process.

#### 6. Policy Content

**Community Engagement Policy**

**6.1 Community Engagement Categories**

Council will apply the following engagement categories in accordance with the Community Engagement Charter. Engagement requirements are set out for each category and must be applied proportionately, having regard to the scale, impact and level of community interest.

**6.1.1 Significant – Annual Business Plan and Rating Policy**

Minimum requirements:

- Publish information on Council website and in a local news publication
- Provide clear, plain language explanation of the proposal, purpose and impacts
- Explain how community feedback will inform the decision
- Invite submissions and provide clear instructions for participation
- Provide a minimum consultation period of 21 days
- Hold a public meeting where the community is invited to provide submissions (written or verbal), the public meeting may be part of a Council meeting or a separate event
- Provide a summary of community feedback to Council prior to decision-making

**6.1.2 Significant**

Minimum requirements:

- Publish information on Council website and in a local news publication
- Provide clear, plain language explanation of the proposal and its impacts
- Invite submissions and provide a minimum 21-day consultation period
- Invite people who have made a written submission to attend a council meeting to speak to their submission before the decision is made.
- Seek and consider community feedback
- Provide a summary of feedback to Council

**6.1.3 Standard**

Minimum requirements:

- Publish information on Council website
- Provide clear and accessible information about the proposal
- Invite submissions and provide an appropriate consultation period
- Seek and consider community feedback

**6.1.4 Local**

Minimum requirements:

- Target engagement to affected stakeholders or local community
- Use appropriate notification methods to reach impacted parties
- Provide accessible information and opportunity for feedback

**6.1.5 Inform**

Minimum requirements:

**Community Engagement Policy**

- Provide timely and accessible information to the affected community

**6.2 Statutory Consultation Requirements**

Where consultation requirements are prescribed under the *Local Government Act 1999*, Council will comply with those legislative obligations as a minimum standard. This includes, but is not limited to:

- Representative Reviews (Section 12)
- Status of a council/change of names (Section 13)
- Adoption or amendment of the Community Engagement Policy (Section 50)
- Strategic Management Plans (Section 122(6))
- By-laws (Section 249)
- Policies relating to Orders (Section 259)
- Stormwater Management Plans (Schedule 1A, Clause 16(2)(c))<sup>A</sup>

For the above matters, Council will:

- Undertake all consultation steps required by the Act
- Apply additional engagement in accordance with this Policy and the Community Engagement Charter where appropriate
- Ensure engagement is proportionate to the significance and impact of the decision
- Council will undertake the engagement process specified by any Stormwater Management Authority Guidelines when acting under Division 3 of Schedule 1A of the Act.

**6.3 Council decisions subject to Consultation**

Where the *Local Government Act 1999* requires Council to follow its Community Engagement Policy, Council will undertake consultation in accordance with the requirements set out in this Policy and the Community Engagement Charter. This includes:

- Principal Office – Opening hours (Section 45)
- Code of Practice – Access to meetings and Documents (Section 92)
- Annual Business Plan (Section 123)
- Changes to the basis of rating (Section 151)
- Differential Rates (Section 156)
- Community land – Revocation of classification (Section 194)
- Community land – Management Plans (Sections 197 to 198)
- Community Land – lease or licence (Section 202)
- Roads – permits affecting traffic (Section 223)
- Vegetation planting with significant impact (Section 232)

For the above matters, Council will:

- Apply the engagement category in accordance with Clause 6.1.
- Undertake engagement proportionate to the significance and impact of the matter.
- Meet all mandatory requirements of the Charter relevant to the category.
- Follow the community engagement process outlined in Clause 6.4.

#### 6.4 Community Engagement Process

The following outlines the community engagement process for ~~Significant—Annual Business Plan and Rating Policy, Significant and Standard~~ community engagement categories:

##### 1. Develop a Community Engagement Plan.

The Community Engagement Plan should:

- Identify the engagement category
- Defines objectives and methods
- Ensures accessibility and inclusivity

##### 2. Obtain approval

The Community Engagement Plan should be endorsed by Council or Chief Executive Officer for the engagement approach.

##### 3. Information Provision

Provide clear information that explains:

- The proposal
- The reason for the proposal
- The intended outcomes
- How feedback will be used

##### 4. Engagement Delivery

Conduct engagement using methods appropriate to the category.

##### 5. Feedback Collection and Analysis

Collect, collate and analyse all submissions and feedback

##### 6. Community Engagement Submission Report

Prepare a community engagement submission report that:

- Summarises engagement activities, key themes and feedback
- Demonstrates how community input has influenced recommendations

##### 7. Decision Making

Where a decision is required, Council considers the Community Engagement summary report and then makes a decision.

##### 8. ~~Communicate Council's decision~~Closing the Loop

Council's decision should be clearly communicated to the community which outlines:

- The outcome
- The reasons for the decision
- How community feedback was considered and influenced the outcome

#### 6.5 Discretionary Community Engagement

#### Community Engagement Policy

Council acknowledges that the *Local Government Act 1999* and the Community Engagement Charter may not prescribe engagement requirements for all decisions, activities, or processes, and that Council is not obliged to assess or undertake community engagement for all such matters.

However, the Council or Chief Executive Officer may determine that community engagement beyond the minimum legislative or policy requirements should be undertaken. ~~Discretionary~~ Consultation may be appropriate for projects involved:

- Significant capital expenditure
- Economic, social, environmental, or cultural importance
- High community interest
- Enhanced decision-making through public engagement.

Guidance materials such as the City of Victor Harbor Community Engagement Toolkit, Local Government Association of South Australia Community Engagement Framework and IAP2 resources may be referenced.

~~For the avoidance of doubt, there is no obligation on the Council or CEO to undertake, or to consider whether to undertake, any additional or discretionary consultation steps.~~

## 6.6 Roles and Responsibilities

### 6.6.1 Council

Council is responsible for:

- Making decisions under the Local Government Act on behalf of the Community
- Participating in and advocate for community engagement processes and activities
- Considering community input as part of its decision making along with other relevant information including legislation, policy, resources, expert advice and previous council decisions.

### 6.6.2 Chief Executive Officer

The Chief Executive Officer or delegate is responsible for:

- Leading and overseeing the implementation of the Community Engagement Policy across the organisation.
- Ensuring Council and all staff adhere to the Policy's principles and legislative requirements.

### 6.6.3 Directors

The Directors are responsible for ensuring council employees:

- Comply with this Policy; and
- Develop a community engagement plan for all relevant consultation and engagement activities

### 6.6.4 Communication Team

Communications Team are responsible for:

#### Community Engagement Policy

- Providing advice and assistance to council employees and the community in adhering to the Policy and drafting a community engagement strategy; and
- Reviewing the Policy
- Maintaining a register of recognised representative and peak bodies and ensuring registered bodies are notified directly when Council commences a community engagement process relevant to their members.

### 7. Risk Management

Council recognises that effective community engagement is critical to transparent, accountable and informed decision-making. The risks associated with community engagement are managed through the consistent application of this policy, the Charter and relevant legislative requirements.

### 8. Implementation/Delegations

The Chief Executive Officer is responsible for the implementation and application of this policy, and where necessary reporting the outcomes of consultations to the Council.

Specific engagement activities to be undertaken in relation to any particular decision, activity or processes shall be determined on a case-by-case basis, by:

- Council, by resolution;
- the CEO;
- a delegate with the power to undertake community engagement under the Act, the Charter or this policy; or
- a delegate with power to make a decision or undertake an activity or process that requires community engagement under the Act, the Charter or this policy.

Council, the CEO or a delegate are not required by this policy to undertake, or to consider or determine whether to undertake, additional engagement activities or methods beyond those prescribed. Any decision to undertake engagement beyond the requirements of this Policy is made at the absolute discretion of the decision maker.

### 9. Related Documents

City of Victor Harbor Community Plan 2030  
City of Victor Harbor Community Engagement Toolkit  
Community Engagement Charter (11 December 2025)  
IAP2 Public Participation Spectrum

### 10. Availability of Policy

This policy is available on Council's website at [www.victor.sa.gov.au](http://www.victor.sa.gov.au).

## Community Engagement Policy

**Attachment 1**

The table provided at Attachment 1 outlines the typical Community Engagement Charter category and minimum engagement requirements for common legislative matters. The table below is only a guide and each matter must be assessed individually to ensure appropriate categorisation and compliance with the Charter.

| Matter                                              | Legislation | Typical Charter Category     | Minimum Engagement Requirement                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|-----------------------------------------------------|-------------|------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Principal Office – Opening hours                    | Section 45  | Inform / Standard            | <ul style="list-style-type: none"> <li>• Publish information on Council website</li> <li>• Provide clear and accessible information about the proposal</li> <li>• Invite submissions and provide an appropriate consultation period</li> <li>• Seek and consider community feedback</li> <li>• Provide timely and accessible information to the affected community</li> </ul>                                                                                                                                                                                                                                                                                                                  |
| Code of Practice – Access to meetings and Documents | Section 92  | Standard                     | <ul style="list-style-type: none"> <li>• Publish information on Council website</li> <li>• Provide clear and accessible information about the proposal</li> <li>• Invite submissions and provide an appropriate consultation period</li> <li>• Seek and consider community feedback</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                 |
| Annual Business Plan                                | Section 123 | Significant – ABP and Rating | <ul style="list-style-type: none"> <li>• Publish information on Council website and in a local news publication</li> <li>• Provide clear, plain language explanation of the proposal, purpose and impacts</li> <li>• Explain how community feedback will inform the decision</li> <li>• Invite submissions and provide clear instructions for participation</li> <li>• Provide a minimum consultation period of 21 days</li> <li>• Hold a public meeting or provide equivalent opportunity for verbal submissions (The public meeting may be part of a council meeting or a separate event).</li> <li>• Provide a summary of community feedback to Council prior to decision-making</li> </ul> |

## Community Engagement Policy

|                                               |             |                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|-----------------------------------------------|-------------|------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Changes to the basis of rating                | Section 151 | Significant – ABP and Rating | <ul style="list-style-type: none"> <li>• Publish information on Council website and in a local news publication</li> <li>• Provide clear, plain language explanation of the proposal, purpose and impacts</li> <li>• Explain how community feedback will inform the decision</li> <li>• Invite submissions and provide clear instructions for participation</li> <li>• Provide a minimum consultation period of 21 days</li> <li>• Hold a public meeting or provide equivalent opportunity for verbal submissions (the public meeting may be part of a council meeting or a separate event).</li> <li>• Provide a summary of community feedback to Council prior to decision-making</li> </ul> |
| Differential Rates                            | Section 156 | Significant                  | <ul style="list-style-type: none"> <li>• Publish information on Council website and in a local news publication</li> <li>• Provide clear, plain language explanation of the proposal and its impacts</li> <li>• Invite submissions and provide a minimum 21-day consultation period</li> <li>• Invite people who have made a written submission to attend a council meeting to speak to their submission before the decision is made.</li> <li>• Seek and consider community feedback</li> <li>• Provide a summary of feedback to Council</li> </ul>                                                                                                                                           |
| Community land – Revocation of classification | Section 194 | Significant                  | <ul style="list-style-type: none"> <li>• Publish information on Council website and in a local news publication</li> <li>• Provide clear, plain language explanation of the proposal and its impacts</li> <li>• Invite submissions and provide a minimum 21-day consultation period</li> <li>• Invite people who have made a written submission to attend a council meeting to speak to their submission before the decision is made.</li> </ul>                                                                                                                                                                                                                                               |

## Community Engagement Policy

|                                                          |                     |                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|----------------------------------------------------------|---------------------|----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                          |                     |                | <ul style="list-style-type: none"> <li>• Seek and consider community feedback</li> <li>• Provide a summary of feedback to Council</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                         |
| Community land – Management Plans (Adoption / Amendment) | Sections 197 to 198 | Significant    | <ul style="list-style-type: none"> <li>• Publish information on Council website and in a local news publication</li> <li>• Provide clear, plain language explanation of the proposal and its impacts</li> <li>• Invite submissions and provide a minimum 21-day consultation period</li> <li>• Invite people who have made a written submission to attend a council meeting to speak to their submission before the decision is made.</li> <li>• Seek and consider community feedback</li> <li>• Provide a summary of feedback to Council</li> </ul> |
| Community Land – lease or licence                        | Section 202         | Significant    | <ul style="list-style-type: none"> <li>• Publish information on Council website and in a local news publication</li> <li>• Provide clear, plain language explanation of the proposal and its impacts</li> <li>• Invite submissions and provide a minimum 21-day consultation period</li> <li>• Invite people who have made a written submission to attend a council meeting to speak to their submission before the decision is made.</li> <li>• Seek and consider community feedback</li> <li>• Provide a summary of feedback to Council</li> </ul> |
| Roads – permits affecting traffic                        | Section 223         | Local / Inform | <ul style="list-style-type: none"> <li>• Target engagement to affected stakeholders or local community</li> <li>• Use appropriate notification methods to reach impacted parties</li> <li>• Provide accessible information and opportunity for feedback</li> </ul>                                                                                                                                                                                                                                                                                   |

Community Engagement Policy

|                                             |             |       |                                                                                                                                                                                                                                                                |
|---------------------------------------------|-------------|-------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Vegetation planting with significant impact | Section 232 | Local | <ul style="list-style-type: none"><li>• Target engagement to affected stakeholders or local community</li><li>• Use appropriate notification methods to reach impacted parties</li><li>• Provide accessible information and opportunity for feedback</li></ul> |
|---------------------------------------------|-------------|-------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## Attachment 4 – Business Victor Harbor Written Response to the Community Engagement Policy Consultation

**From:** "Reese Adams | Business Victor Harbor"  
<members@businessvictorharbor.com.au>  
**Sent:** Mon, 27 Jul 2026 10:46:10 +0930  
**To:** "City of Victor Harbor" <localgov@victor.sa.gov.au>; "Graham Pathuis" <[REDACTED]>; "Angela Schiller" <angela.schiller@victor.sa.gov.au>; "Brayden Mann" <brayden.mann@victor.sa.gov.au>; "David Kemp" <david.kemp@victor.sa.gov.au>; "Carol Schofield" <carol.schofield@victor.sa.gov.au>; "Marilyn Henderson" <marilyn.henderson@victor.sa.gov.au>; "Michael Quinton" <michael.quinton@victor.sa.gov.au>; "Nick McKenzie" <nick.mckenzie@victor.sa.gov.au>; "Moira Jenkins" <moira.jenkins@victor.sa.gov.au>; "Stewart Burns" <stewart.burns@victor.sa.gov.au>  
**Cc:** "Board" <board@businessvictorharbor.com.au>; "Ben Witkowski | Business Victor Harbor" <marketing@businessvictorharbor.com.au>  
**Subject:** Draft Community Engagement Policy submission from Business Victor Harbor  
**Attachments:** BVH Submission Community Engagement Policy.pdf, BVH Submission Community Engagement Policy.docx

Dear Chief Executive Officer, Mayor Jenkins, and Councillors,

Please find attached Business Victor Harbor's submission in response to the City of Victor Harbor's public consultation on the Draft Community Engagement Policy. The submission has been prepared by the entire Board of Business Victor Harbor and is provided on behalf of our members and in the interests of all businesses operating within the City of Victor Harbor.

BVH's central conclusion is that the policy should not be adopted in its current form.

We have identified several areas where we believe the draft represents a step backwards from the existing policy and have made a series of practical, low-cost recommendations that we believe would strengthen the policy while remaining fully consistent with the Community Engagement Charter.

This submission will be published on the Business Victor Harbor website following lodgement and a media release summarising the submission and key recommendations will follow.

We appreciate the opportunity to participate in this consultation and look forward to Council's consideration of our submission.

Kind Regards,

--

**Reese Adams** | General Manager  
Business Victor Harbor Inc.

**M:** 0411 810 990

**E:** [members@businessvictorharbor.com.au](mailto:members@businessvictorharbor.com.au)

**W:** [businessvictorharbor.com.au](http://businessvictorharbor.com.au)

**Office:** 2/23 Victoria St, Victor Harbor SA 5211

**BUSINESS  
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**SUBMISSION TO THE CITY OF VICTOR HARBOR**

**Draft Community Engagement Policy**

*Consultation closing 5:00pm, Monday 27 July 2026*

**BEFORE ADOPTING THIS POLICY:**

**Compare it, clause by clause, against the policy it replaces (Section 4.6).**

**In four respects, it is a step backwards and should not be adopted as drafted.**

**THE ASK AT A GLANCE: for time-poor readers**

**The detail.** One short clause in the policy, and one contact register, at near-zero cost to Council. The five specific changes below are what deliver it in full:

1. Restore "closing the loop" as a standing commitment across all engagement categories, as the draft's own Policy Statement promises.
2. Soften the "absolute discretion" framing (stated three times), consistent with Ombudsman SA guidance.
3. Reinstate the explicit commitment that submissions received will be considered in decision-making.
4. Re-name business owners and interest groups in the definition of "community," as the 2022 policy did.
5. Publish consultation outcomes in one accessible place.

**How to respond.** A response table at Section 9 lets Council record its position on each recommendation: accept, modify or decline, with reasons. This is an open submission: it is being shared with the business community, and Council's response (if any) will be shared the same way.

|                              |                                                                                                                                  |
|------------------------------|----------------------------------------------------------------------------------------------------------------------------------|
| <b>Submitted by</b>          | Business Victor Harbor (BVH)                                                                                                     |
| <b>Prepared on behalf of</b> | The Board and staff of Business Victor Harbor                                                                                    |
| <b>Date</b>                  | July 2026                                                                                                                        |
| <b>Matter</b>                | Draft Community Engagement Policy (to replace the Public Consultation Policy)                                                    |
| <b>Submitted to</b>          | Chief Executive Officer, City of Victor Harbor - <a href="mailto:localgov@victor.sa.gov.au">localgov@victor.sa.gov.au</a>        |
| <b>Status</b>                | Open submission: published to BVH members and the wider business community, together with Council's response, if any is provided |

**Declaration of interest.** The City of Victor Harbor provides partial grant funding toward member support and infrastructure functions at BVH, delivered alongside, not in place of, the substantial unpaid time contributed by our volunteer Board and ongoing private business sponsorship. BVH makes this declaration openly, consistent with our practice in all submissions touching Council funding. Council's contribution is one of several sources that sustain BVH's operations; it does not affect the independence of the views in this submission, which are offered constructively and in good faith. As noted in Section 7, that same partnership is also relevant evidence of Council's existing recognition of BVH as its principal business representative body.

**BUSINESS VICTOR HARBOR**

2/23 Victoria St, Victor Harbor

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Document Set ID: 10595929

Version: 1, Version Date: 27/07/2026



## 1. Executive Summary

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Business Victor Harbor (BVH) welcomes the opportunity to comment on the City of Victor Harbor's draft Community Engagement Policy. BVH is the principal independent business advocacy body for Victor Harbor. While our membership numbers more than 150 businesses, our advocacy is for the whole business community of the City of Victor Harbor, more than 1100 businesses, member and non-member alike. The decisions Council makes on rates, the public realm, permits and the town centre shape whether local businesses can plan, invest and trade with confidence, so the quality of Council's engagement is, for every business in the city, a practical economic issue.

Aligning Council's framework with the new Community Engagement Charter is a sensible objective, and several features of the draft are genuine improvements: a clearer tiered approach, a defined engagement process, and an explicit step to report back on how feedback shaped a decision. BVH acknowledges these directions.

But whatever the objective, the effect of several drafting choices, examined in detail in Section 4, works against it. Local government exists because local people have a right to input into the decisions that affect them, and input that is genuinely heard, not simply logged. On four specific measures the draft moves in the opposite direction: it narrows the commitment to report back on how feedback was used, repeatedly casts engagement beyond the legislative minimum as optional and at Council's discretion, softens the explicit promise that submissions will be considered, and removes the very words: ratepayers, business owners, interest groups - that named who Council was committing to hear. Whatever the reasoning behind each individual change, the cumulative effect is a policy that makes it easier for Council to stop listening, not harder.

Our concern is specific and, we believe, well founded. In several respects the draft is **weaker** than the Public Consultation Policy it replaces, and in one important respect it falls short of the Charter's own principles. The draft meets the Charter's mandatory minimums, but treats them as a ceiling rather than a floor, so the Charter's broader principles are honoured only where they coincide with a minimum. "Closing the loop" is the clearest casualty: the draft confines report-back to its top three categories, below Charter Principle (e), below the IAP2 standard it cites, and tellingly, below the draft's own Policy Statement, which promises to communicate how community input influenced the outcome with no such limit. It also repeatedly stresses that engagement beyond the minimum is optional and at Council's "absolute discretion" - language the Ombudsman SA has effectively cautioned against, and drops the explicit naming of business as part of the community Council consults.

This is not a hypothetical risk. Council's own published consultation reports show that, in each of the past several budget cycles, a majority of respondents opposed the proposed rate increase, primarily on affordability grounds, and in every year where the outcome is on the public record, the adopted rate increase matched the draft, unchanged. Feedback was received; there is no public record of it being genuinely weighed, debated in chamber, or answered. That is not community engagement, it is a compliance exercise. Before this policy is adopted, Council should be transparent about how such feedback is considered, and answerable where it demonstrably has not changed an outcome. Section 2 sets out this record in full.

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BVH's central recommendation is constructive and low-cost: that the policy formally recognise established representative bodies (such as BVH) and commit to directly notifying them of relevant consultations. This is not a novel request - comparable Australian government bodies, including the National Capital Authority and the City of Onkaparinga, already operate stakeholder registers and direct-notification mechanisms. It also simply operationalises commitments Council has already made as a Small Business Friendly Council.

#### Our five recommendations at a glance

|   |                                                                                                           |
|---|-----------------------------------------------------------------------------------------------------------|
| 1 | (priority) Recognise representative bodies and notify them directly of relevant consultations.            |
| 2 | Restore "closing the loop" as a standing commitment mirroring Charter Principle (e).                      |
| 3 | Temper the "absolute discretion" language, consistent with Ombudsman SA guidance.                         |
| 4 | Reinstate an explicit "submissions considered in decision-making" commitment.                             |
| 5 | Re-name business and interest groups in the definition of "community," and publish outcomes in one place. |

## 2. About This Submission

---

This submission comes from the ratepayers and business owners who fund Council's operations, including through the differential paid disproportionately by commercial and industrial properties, and who bring direct, practical experience of the decisions Council makes. That is the basis on which we expect this submission to be heard: not as a courtesy extended to Council, but because drawing on exactly this expertise, before decisions are made, is what genuine community engagement is for. Council's own draft policy is expressly tied to Aspiration 6.2 of its Strategic Plan: "Ensure our community is well informed and has opportunities to inform decision making." Every recommendation in this submission is aimed at delivering that commitment in full, not simply restating it.

We also write from direct, recent experience. Twice in the past eight months, BVH lodged detailed written submissions on the outdoor dining and street trading matter, at Council's invitation. Neither appeared in any public Council agenda. When the matter was decided on 22 June 2026, the report's Consultation section named Council Members, Senior Management and Budget Officers, not the business organisation whose proposal was being decided. Council had this information. It was not put before the public, and it was not visibly acted on. That is the experience this policy needs to fix.

Our experience with the 2026/27 Annual Business Plan consultation shows the other side of the same coin. There, our submission was included in the agenda papers for Council's decision - and we acknowledge that. But it raised specific, answerable questions of financial transparency: why the draft plan did not allow a reader to determine whether economic development spending is in the order of \$570,000, \$660,000 or several million dollars; and why the Economic Development Differential reserve is reported with no opening balance, annual transfers or closing balance. To date, BVH has received no direct response to that submission or to the questions it raised. So, the pattern holds whichever route a submission takes: either it never reaches the public record, or it reaches the record and is never responded to. In neither case can the community see how, or whether, its input was weighed. That is the loop this policy exists to close.

#### BUSINESS VICTOR HARBOR

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This pattern is not confined to our own submissions. Look at Council's own published record on its annual budget consultation over recent years, and the same pattern recurs at a much larger scale. In 2024/25, Council's own engagement report recorded that 80 of 90 survey respondents did not support the draft budget, citing the rate increase as their primary concern. The following year, in 2025/26, 17 of 21 respondents said the same. The year before that, Council's own consultation report for the 2023/24 budget concluded that residents were clearly worried about the impact of the proposed rate rise on their household budgets. In each case where the outcome is on the public record, the final adopted rate increase matched the draft, unchanged: 6% in 2024/25 and 5% in 2025/26. Council's own long-term financial plan, independently reviewed by the Essential Services Commission of South Australia in 2024, was at that time projecting average increases of just 3.2% a year over the following decade, well below the increases ratepayers have actually faced since. Feedback of this scale, repeated year after year, deserves more than acknowledgement in a survey summary. It deserves visible consideration in chamber, and a public answer as to why it did not change the outcome, precisely the accountability this policy should guarantee, for ratepayers and businesses alike.

We must also convey, honestly, a perception now widespread across the business community: that public consultation is too often treated as a compliance step; a tick-and-flick exercise conducted in the spirit of meeting minimum legislative requirements rather than genuinely engaging the community whose input is sought. We do not suggest any officer or Council Member intends this. But perception is built from experience, and the experience described above is what built this one. A draft policy that entrenches minimums as the default, reserves 'absolute discretion' three times over, and narrows the report-back commitment will confirm that perception. A policy that does the opposite is Council's single best opportunity to change it.

### 3. Areas of Support

---

BVH supports the following features of the draft policy:

- **The tiered engagement model.** Matching engagement to the significance and impact of a decision is sound and consistent with the Charter's categories.
- **A defined engagement process.** Clause 6.4 sets out a clear eight-step process. A documented process is a real improvement on the previous policy.
- **The commitment to report back.** Step 8 requires Council to communicate the outcome, the reasons, and how community feedback influenced it. This is the right principle, but our concern (4.1) is that it is confined to the three highest categories.
- **Reference to IAP2.** The draft lists the IAP2 Public Participation Spectrum among its related documents. BVH welcomes this: it means the IAP2 standard is one Council has itself adopted, and we hold the draft to it below.
- **Stronger accessibility and inclusion language.** The emphasis on plain language and reaching a diverse community is welcome and Charter-consistent.

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#### 4. Areas of Concern

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Much of the draft improves on the old policy. But a replacement should not go backwards on the commitments the community already relied on, nor fall short of the Charter it is meant to implement. In five respects it does one or the other. We set these out plainly, then show the net effect in a side-by-side comparison.

##### **4.1 “Closing the loop”: the draft treats the minimum as a ceiling, and falls below its own promise.**

Two things in the Charter need to be kept apart: its mandatory requirements (the category-by-category minimum actions) and its principles (the broader statements of intent in section 50(2) of the Local Government Act). The draft implements the mandatory minimums well. Its weakness is that it treats those minimums as a ceiling rather than a floor: anything beyond them is repeatedly cast as discretionary (see 4.2). The effect is that the Charter's broader principles are honoured only where they happen to coincide with a mandatory minimum, and where they do not - they fall away. Principle (e), the “closing the loop” principle, is the clearest casualty.

The mechanics show it. The Public Consultation Policy (reviewed 22 June 2022) carried “Closing the Loop” as a named principle applying across the board. In the draft, the equivalent survives only as step 8 of the Clause 6.4 process, which by its own terms applies to the Significant–Annual Business Plan, Significant and Standard categories only. For Local and Inform matters (where many day-to-day decisions affecting individual businesses and precincts will land) there is no equivalent guarantee that Council will explain how feedback was considered.

That places the draft below the Charter's own standard. Charter Principle (e) states that “insofar as is reasonable, communities should be provided with information about how community views have been taken into account and reasons for decisions or actions of councils” (SA Community Engagement Charter, gazetted 11 December 2025) - a principle not confined to the top categories. The best-practice standard the draft itself cites, the IAP2 Spectrum, is the same: at the “Consult” level the promise to the public expressly includes providing feedback on how public input influenced the decision, and IAP2's seventh core value is to communicate to participants how their input affected the outcome.

Most tellingly, the draft does not even meet the standard it sets for itself. Its own Policy Statement (Summary) commits Council to communicate “how community input influenced the final outcome” - stated generally, with no category limit. Yet Clause 6.4 confines that report-back to the top three categories. The draft promises loop-closing broadly in its summary and delivers it narrowly in its mechanics. Applying the report-back commitment across all categories, consistent with the draft's own Policy Statement, Charter Principle (e) and IAP2, would resolve the inconsistency and close the gap in a single stroke.

##### **4.2 The repeated “absolute discretion” framing sits uneasily with the Ombudsman SA standard.**

The draft states, in three separate places, that Council is under no obligation to engage beyond the minimum: that it “is not obliged to assess or undertake community engagement” for unprescribed matters (6.5); that there is “no obligation ... to undertake, or to consider whether to undertake, any additional or discretionary consultation” (6.5); and that any decision to engage beyond the requirements is “made at the absolute discretion of the decision maker” (Clause 8). The 2022 policy contained nothing equivalent.

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We understand Council must manage resourcing and legal exposure, and BVH does not dispute that some discretion is necessary. But the cumulative effect of stating it three times, in the firmest terms, is a policy whose centre of gravity sits on the minimum. That runs against the direction the Ombudsman SA has signalled. In its recent investigation of the District Council of Cleve, Ombudsman SA observed that “fulsome public consultation improves the quality of decisions and increases public trust in government”, and reminded councils to consider whether, “beyond the minimum legislative requirements”, additional steps should be taken to ensure meaningful and transparent engagement (Ombudsman SA, 2024).

BVH is not asking Council to fetter its discretion; we are asking that the policy be worded to encourage its sensible use, not to signal a default of doing the least the law allows.

**4.3 “Submissions considered in decision-making” is no longer an explicit, itemised commitment.**

The 2022 policy included a consultation-steps table with a discrete, ticked commitment: that submissions would be considered by Council in its decision-making, applied across almost every matter type. It was explicit and auditable. In the draft this is carried only by the definition of “submissions” and by the process report, which is softer and less visible.

BVH's recent experience shows why the distinction matters: an explicit, itemised commitment is auditable in a way that softer definitional language is not. The community can see that submissions were considered, rather than having to take it on trust.

**4.4 The definition of “community” removes business owners, ratepayers and interest groups by name.**

The 2022 policy said plainly who counted as community: residents and voters, ratepayers, business owners, Council customers, contractors and suppliers, community interest groups and hard-to-reach groups. The draft deletes every one of those names and replaces them with generic prose: people who “live, work, study, visit or do business” in the area. This is not a drafting simplification. It is a policy choice to stop naming and, by extension, to stop specifically recognising, the ratepayers, business owners and interest groups whose money funds this city and whose feedback this policy exists to invite.

If Council intends to keep consulting business owners, ratepayers and interest groups exactly as it always has, there is no reason not to keep naming them. The only practical effect of removing the names is to remove the obligation. We ask that they be put back.

**4.5 The draft is silent on how it will reach organised, representative stakeholders.**

Neither the old nor the new policy provides a mechanism for notifying established representative bodies of relevant consultations. Charter Principle (a) speaks of “reasonable, timely, meaningful and ongoing” opportunities to participate. In practice that is hard to deliver if the organisations representing whole sectors of the community must rely on noticing a consultation on Council's website. This gap is the subject of our central recommendation in Section 7, where we show it is readily and cheaply closed.

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#### 4.6 Summary: is the community better or worse off?

On balance, the draft is better on structure and process, and worse on the strength and reach of Council's commitments.

The table compares the 2022 policy with the draft.

| Feature                                      | 2022 Public Consultation Policy              | Draft Community Engagement Policy                                                            | Net effect    |
|----------------------------------------------|----------------------------------------------|----------------------------------------------------------------------------------------------|---------------|
| <b>Tiered engagement model</b>               | Three levels, applied loosely                | Five Charter categories with defined minimums                                                | <b>Better</b> |
| <b>Defined engagement process</b>            | Not a step-by-step process                   | Clear 8-step process (Clause 6.4)                                                            | <b>Better</b> |
| <b>"Closing the loop" / report-back</b>      | A standing named principle, across the board | Top three categories only - below Charter Principle (e) and the draft's own Policy Statement | <b>Worse</b>  |
| <b>Engagement beyond the minimum</b>         | No "absolute discretion" language            | Stated three times as optional / "absolute discretion"                                       | <b>Worse</b>  |
| <b>"Submissions considered in decisions"</b> | Explicit, itemised commitment                | Carried by definitions only; less visible                                                    | <b>Worse</b>  |
| <b>Naming business as a stakeholder</b>      | "Business owners... interest groups" named   | Enumeration dropped                                                                          | <b>Worse</b>  |
| <b>Notifying representative bodies</b>       | No mechanism                                 | No mechanism (precedent exists elsewhere)                                                    | Gap           |
| <b>Accessibility &amp; inclusion</b>         | Present                                      | Strengthened, Charter-aligned                                                                | <b>Better</b> |

*The four "worse" rows point the same way: the draft gives Council more room to do less and gives the community fewer guaranteed points of reply. Our recommendations are designed to correct that imbalance.*

## 5. Why This Matters for Local Business

Engagement policy can seem procedural. For business, it is not. Victor Harbor's is a substantial and distinctive local economy: the council area is home to more than 1,100 registered businesses, and around two-thirds of them are small or non-employing operators (ABS Counts of Australian Businesses, 2024).

It is also intensely seasonal. The town's population almost triples over the summer holiday period (City of Victor Harbor) and is heavily tourism-dependent, attracting approximately 1.2 million visitors and an estimated \$163 million in visitor spending each year (City of Victor Harbor / LGA SA). A regulatory or public-realm decision made without business input, or made at the wrong time of year, can affect an entire trading season.

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Why the business voice needs a reliable seat at the table

|                                         |                                                    |                                                  |                                   |                                 |                                        |
|-----------------------------------------|----------------------------------------------------|--------------------------------------------------|-----------------------------------|---------------------------------|----------------------------------------|
| <b>150+</b><br>BVH member<br>businesses | <b>1,100+</b><br>businesses in the<br>council area | <b>~2 in 3</b><br>are small or non-<br>employing | <b>×3</b><br>population in summer | <b>~1.2M</b><br>visitors a year | <b>~\$163M</b><br>visitor spend a year |
|-----------------------------------------|----------------------------------------------------|--------------------------------------------------|-----------------------------------|---------------------------------|----------------------------------------|

*A substantial, heavily small-business and highly seasonal economy where a mistimed decision can affect an entire trading year.  
Sources: ABS Counts of Australian Businesses (2024); City of Victor Harbor / LGA SA. Figures approximate.*

Four impacts are worth naming directly:

- Businesses plan against Council decisions.**  
 Certainty about how and when they can have input lets operators plan investment, staffing and fit-out. A policy weighted toward “minimum, at discretion” reduces that certainty.
- A representative body saves Council time, if engaged early.**  
 Early is the operative word. Right now, there is no standing mechanism guaranteeing BVH, or any representative body, is notified when a relevant consultation opens, let alone notified early enough to contribute before a matter is substantially settled. Engaged early, BVH can deliver a single, considered, sector-wide view rather than many individual late responses.  
 A notification mechanism reaching more than 1,100 businesses through one channel, triggered at the start of a consultation rather than partway through it, is as much an efficiency for Council as a courtesy to business.
- Confidence is cumulative.**  
 Each time a submission visibly informs a decision, business confidence in Council rises; each time input appears unheard, it erodes. That is why the report-back commitment is the single most valuable feature of the draft, and why we want it applied more widely, not less.
- Consultation underpins the visitor economy.**  
 From a tourism and hospitality perspective, engagement is not administrative, it is commercial. Operators promote not only their own businesses but the Victor Harbor brand itself, and they can only do that well when Council decisions affecting the public realm, events and activation are made with their input. Reducing consultation weakens that partnership; the sector's clear view is that Council should be seeking more input from residents and businesses, not less, if the economic development the region has enjoyed is to continue.

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## 6. In Their Own Words: The BVH Board

This submission is not the view of a single officeholder. It reflects the whole Board of Business Victor Harbor and the businesses and sectors they represent across our town.

In their own words, this is why getting community engagement right matters to them:

| Board member                                                            | In their words                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Kirsten Pitman</b><br><i>President + Pitman Food Group</i>           | <i>"Local government should be encouraged to incorporate more feedback from local ratepayers and community groups like BVH, who are impacted by the decisions made in chambers. Less consultation, less acknowledgement, and the removal of business as a specifically referenced source of experienced feedback ensures further disconnect in the future. Local government, by definition, should have the decision-makers most connected to their community, and without structured engagement, that opportunity is lost."</i> |
| <b>Michael Schubert</b><br><i>Vice President + ShedEx Fleurieu</i>      | <i>"Every business in Victor Harbor makes decisions off the back of Council decisions: what to invest, who to employ, whether to expand. When we put a considered submission to Council, we're not asking for special treatment; we're asking to know it was read, weighed and answered. A policy that only commits to closing the loop on some consultations, some of the time, tells the business community its input is optional. The 2022 policy promised better, and the new one should too."</i>                           |
| <b>Babara Vermeulen</b><br><i>Secretary + Specsavers Victor Harbor</i>  | <i>"Good engagement is how a council and its community build trust, and trust is exactly what's at stake here. Putting out a press release after a decision is communication, not consultation, and business owners know the difference. The old policy set a standard we could rely on; the new one should lift that standard, not lower it."</i>                                                                                                                                                                               |
| <b>Leanne Farr</b><br><i>Board Member + BCS Electrical</i>              | <i>"When Council does consult, the timeframes are often so short that businesses barely have a chance to respond and that says something about how much our input is really valued. Confidence works both ways: when businesses feel genuinely heard, they invest and grow, and the whole community benefits. We should be supporting and working with each other, not working around each other."</i>                                                                                                                           |
| <b>Richard Foggo</b><br><i>Board Member + Richard Foggo For Finance</i> | <i>"It is fundamental to the rights of the community, and in particular both the business and personal members of the community, that their voice, opinions and, as occasioned, their concerns be heard. Good governance, and good local government in particular, is established and maintained by transparent communication between the community as a whole and its local councillors and council."</i>                                                                                                                       |
| <b>Michael May</b><br><i>Board Member</i>                               | <i>"I would like to say how disappointed I am that Council has taken the human factor out of its consideration of a major revenue source: the businesses of Victor Harbor. Hiding behind bureaucracy doesn't excuse poor communication."</i>                                                                                                                                                                                                                                                                                     |

A seventh Board member has contributed to this submission; at their request their comments are incorporated, unattributed, in the body of this document rather than quoted here. Every member of the BVH Board has endorsed this submission.

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## 7. Recommendations

BVH offers the following recommendations as practical improvements, not objections. None would prevent Council adopting a Charter-compliant policy on time.

### **Recommendation 1 (priority): Recognise representative bodies and commit to notifying them.**

That the policy recognise established, representative community and business bodies, and commit to directly notifying them of consultations relevant to their members. This is achieved by a short clause and a maintained contact register.

This ask is neither novel nor onerous. Comparable Australian government bodies already do it: the National Capital Authority maintains a public register inviting interested parties to register so they can be advised directly about relevant projects and proposals; the City of Onkaparinga commits to “round back to participants” and lets registered stakeholders set notification preferences; and the NSW councils’ engagement toolkit directs that information be provided “through notifications directly to impacted and interested stakeholders.” BVH’s proposal is a reasonable, incremental extension of mechanisms already in use, not a radical one.

It also operationalises commitments Council has already made. As a participant in the Small Business Friendly Council initiative, Council has committed to champion local business voices through forums, advisory groups and regular consultation. Council already recognises BVH as the principal chamber of commerce in the area and partners with it on business engagement. Formal recognition in this policy simply gives that existing relationship a reliable procedural home, at close to no cost.

### **Suggested wording Council could adopt:**

*“Council will maintain a register of recognised representative and peak bodies, and will notify registered bodies directly when it commences a community engagement process relevant to their members.”*

**What this looks like in practice.** The change is easy to picture. When Council next consults on a significant public-realm or permit matter, BVH is notified the day consultation opens, submits once on behalf of the whole business community, and sees in the decision report how that input was weighed. That is the loop closed. For Council - one email, for business - a fair and visible say.

### **Closing the loop: what the change would look like in practice**

*A single reliable channel that reaches 150+ businesses so the community sees how its voice was used.*

| <b>Consultation opens</b><br>Council begins its engagement process | <b>BVH notified</b><br>Directly, the same day, from the register | <b>One clear submission</b><br>One sector-wide view for all local businesses | <b>Loop closed</b><br>Decision report shows how input was weighed |
|--------------------------------------------------------------------|------------------------------------------------------------------|------------------------------------------------------------------------------|-------------------------------------------------------------------|
|--------------------------------------------------------------------|------------------------------------------------------------------|------------------------------------------------------------------------------|-------------------------------------------------------------------|

- 1. Restore “closing the loop” as a standing commitment.** Apply the report-back commitment across all categories, not only the top three. Aligning the operative process with the draft’s own Policy Statement, Charter Principle (e) and IAP2. For example: “Wherever Council invites community feedback, it will, insofar as is reasonable, inform participants how their views were taken into account and the reasons for its decision.”

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2. **Soften the “absolute discretion” framing.** Retain necessary discretion but temper the language. Consistent with the Ombudsman SA guidance, commit that Council will at least consider whether engagement beyond the minimum is warranted for decisions of high community or economic significance.
3. **Reinstate an explicit “submissions considered” commitment.** Restore a visible, itemised statement that submissions received will be considered by Council in its decision-making, as the 2022 policy provided.
4. **Reinstate business owners, ratepayers and interest groups, by name, in the definition of “community.”** Keep the broad definition, but put the names back. There is no drafting reason to delete stakeholders Council intends to keep consulting; doing so removes the obligation, not just the wording.
5. **Publish consultation outcomes in one accessible place.** Maintain a single, current page showing what Council consulted on, the feedback received, and how it influenced the decision.

## 8. Responding to Likely Concerns

We anticipate Council may raise the following, and address each directly and in good faith.

### “The Charter sets minimums, and the draft complies.”

Compliance with the minimums is the floor, and BVH acknowledges the draft meets it. But Charter Principle (e) is a principle, not a minimum. It is not confined to any category, and it calls for communities to be told how their views were taken into account. The Ombudsman SA has likewise reminded councils to look beyond the minimum. BVH is asking Council to honour the principle across the board, not merely to clear the statutory bar.

### “Naming or notifying groups is administratively burdensome... where do we stop?”

The mechanism is deliberately light. A register of a handful of established, recognised peak bodies is trivial to maintain. In practice, one email when a relevant consultation opens. BVH is not asking to be the only body on the register, nor to be treated differently from any other recognised representative group; it asks only that such a mechanism exist and be open to bodies that qualify. The cost-to-benefit balance is stark:

#### A very small cost against a very large risk

##### THE COST TO COUNCIL

**One email per consultation**  
to a short register of recognised peak bodies.

VS

##### THE RISK OF GETTING IT WRONG

**A major public-realm or permit decision, made without business input,**  
in an economy whose population triples each summer, can affect an entire trading season.

*The mechanism BVH proposes costs Council almost nothing, and materially reduces the chance of an avoidable, costly misstep.*

### “The discretionary language protects Council legally.”

BVH does not dispute that Council needs discretion, and nothing in our recommendations removes it. Our concern is tone, not power: stating three times that engagement beyond the minimum is optional and at “absolute discretion” signals a default of doing the least the law allows. We ask only that the wording encourage the sensible use of discretion, as the Ombudsman SA guidance envisages, rather than discourage it.

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## 9. Closing the Loop on This Submission: An Invitation

Section 2 shows what happens without a genuine accountability mechanism: feedback is received, at scale, year after year, and there is no public record of it being weighed, debated or answered. The draft policy commits Council, for its higher-tier engagements, to report back on what was heard and how it shaped the decision. The review of this policy is itself such an engagement. BVH therefore invites Council to treat this submission as the first demonstration of the new policy working as intended: **to close the loop on the consultation about closing the loop.**

Specifically, we ask three things:

- **Provide this submission to all Council Members** ahead of the meeting at which the policy is adopted, and acknowledge it in the Consultation section of the accompanying report, so the decision record shows the business community's input reached the decision-makers.
- **Record Council's position on each recommendation.** Accept, modify or decline, with brief reasons in the engagement outcomes report or the decision report. The table below is offered to make that as easy as possible.
- **Expect us to report back too.** This is an open submission. BVH is sharing it in full with its members and the wider business community of Victor Harbor (all 1,100+ businesses) and will share Council's response the same way, if one is provided. Either way, we will close the loop with the business community on the outcome of this consultation, including how each recommendation was received. We hope that report is a good-news story about the new policy in action. That is genuinely the outcome we are working for.

| Recommendation                                                                  | Council position<br>(accept / modify / decline) | Reason |
|---------------------------------------------------------------------------------|-------------------------------------------------|--------|
| Priority: recognise representative bodies and commit to notifying them directly |                                                 |        |
| 1. Restore "closing the loop" as a standing commitment across all categories    |                                                 |        |
| 2. Soften the "absolute discretion" framing                                     |                                                 |        |
| 3. Reinstate an explicit "submissions considered" commitment                    |                                                 |        |
| 4. Re-name business and interest groups in the definition of "community"        |                                                 |        |
| 5. Publish consultation outcomes in one accessible place                        |                                                 |        |

*Offered in good faith: a one-page way for Council to show the new policy's report-back principle in action, from its first consultation.*

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## 10. Conclusion

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BVH supports Council in modernising its engagement framework and meeting its Charter obligations by the September 2026 deadline. Much of the draft is a genuine improvement, and we have said so plainly.

Our message is equally plain: a policy that confines “closing the loop” below the standard set by Charter Principle (e), emphasises “absolute discretion” three times against the grain of Ombudsman SA guidance, and drops business from the list of named stakeholders is, in those respects, a step backwards. These are fixable in drafting, without delaying adoption. Above all, we urge Council to adopt a simple, well-precedented mechanism to recognise and notify representative bodies: a change that would strengthen the policy at near-zero cost and honour commitments Council has already made.

BVH is not asking Council to consult on everything, or to fetter its decision-making. We are asking Council to ensure that when the community does have something to say, it can rely on being heard and can see how its voice was used. That is Aspiration 6.2 delivered in practice, not just on paper.

Consistent with the approach set out in the draft policy and the Charter, BVH would welcome the opportunity to speak to this submission, and to discuss it with the Chief Executive Officer and relevant officers at Council's convenience.

Respectfully submitted,

### **The Board and staff of Business Victor Harbor**

On behalf of our 150+ member businesses, and more than 1,100 businesses in the City of Victor Harbor.

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