NEW PUBLIC MANAGEMENT AND THE EMPLOYMENT RELATIONSHIP IN VICTORIAN LOCAL GOVERNMENT: IS THERE CAUSE FOR CONCERN?

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Abstract

Many students of public administration have argued that political control of the public service employment relationship would lead to politicisation of public management. This paper considers this issue in the context of the senior officer employment relationship in Victorian local government. Contrary to current exhortations, the study failed to find evidence of the politicisation of senior management in Victorian local government. As a result the paper concludes that the relationship between political control and public service politicisation is more complex than is commonly assumed.

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INTRODUCTION

Significant public sector reform has occurred over the last three decades in many western industrialised countries including Australia (Gregory 1997; Painter and Isaac-Henry 1997; Wilenski 1988). At the local government level in Victoria, this has encompassed changes to organisational design and reporting (Kiss 1999; Vince 1997), the nature of public management employment (Pullin and Haidar 1998), and the privatisation and out-sourcing of many public service activities (Albin 1992; Murfitt 1996). The consequences of these reforms have been examined from the perspective of the equitable distribution of public services, the social consequences on gender, the poor and the weak (Yeatman 1987), and their implications for the values public servants employ in the course of their duties (Pullin 2002). What has not been explored is the potential politicisation of local government senior managers that may emanate from these reforms and the opportunity this presents for patronage appointments.

Public sector change of any great magnitude is more often than not associated with, or preceded and driven by, the modification and amendment of existing statutes and/or the introduction of new ones. This has generally been the case in local government across Australia (Wensing 1997) and more specifically the case in management reform in Victorian local government units (VLGA 1989). However, whilst statutes may be developed with quite specific intentions, this intent may not always be reflected in their interpretation, adaptation and adjustment to existing realities. In the zest to examine the impact of statutory change resulting from the VLGA 1989, little consideration appears to have been given whether or not the change envisaged to senior management employment in Victorian local government has been implemented in the manner in which the designers of the Act intended.

This paper addresses the issue of senior officer employment in Victorian local government and explores if the employment related changes for senior managers, promulgated through the VLGA 1989, have actually been implemented in practice. Having established the nature of senior officer employment, consideration is also given to the potential outcomes of these changes in terms of the politicisation of local government senior managers. It begins by situating the reforms in Victorian local government in the context of the broader framework of new public management (Hughes 1998; O'Faircheallaigh, Wanna, and Weller 1999).

THE RISE OF NEW PUBLIC MANAGEMENT

Following the end of world war two, the public sector in the industrialised world came under sustained attack in terms of its performance across many key areas (O'Faircheallaigh, Wanna et al. 1999). The criticism intensified in the 1960s and it was argued that the roles and responsibilities of government had expanded far too much, the public sector was too centralised and hierarchic, and there was a lack of responsiveness to clients, markets and the changing environment (O'Faircheallaigh, Wanna et al. 1999: 4). In addition, there were concerns that public servants focused on due process, rather than the cost of efficient provision of services, and a paternalistic attitude had developed where public servants assumed the role of the unelected government of their societies (O'Faircheallaigh, Wanna et al. 1999: 4).

Nor surprisingly, these limitations elicited many suggestions, proposals and recommendations. They led to what Hughes (1998: 2) has termed as a ‘new model of public sector management’. Hughes argues that this new model:

has several incarnations, including “managerialism” (Pollitt, 1993); “new public management” (Hood, 1991); “market-based public administration” (Lan, Zhiyong and Rosenbloom, 1992); the “post-bureaucratic paradigm” (Barzelay, 1992); or “entrepreneurial government” (Osborne and Gaebler, 1992). Despite the differing names, these essentially describe the same phenomenon. (Hughes 1998: 2)
The major thrust of what we shall term ‘new public management’ (NPM), is a concerted effort to import private sector philosophies to change the focus of the public sector from administration to management (Hood 1991). Under the NPM framework, the structure of organisations takes a hierarchic form where managers have wide-ranging powers to manage their subordinates and their operations. In contrast to public administration, managers are not controlled through detailed procedures but are motivated by goals, targets and indicators of success which are clearly defined and most preferably quantified (Hood 1991). ‘Explicit standards and measures of performance’ are established where the emphasis is on results rather than procedure, and resource allocation and rewards are linked to performance and results achieved (Hood 1991: 4). In this arrangement, there is concentration rather than ‘diffusion of power’ (Hood 1991: 4).

A focus of NPM is the dis-aggregation of functions and monolithic organisations and the decentralisation of public agencies. These decentralised agencies are provided with the kind of flexibility completely alien to monolithic structures, even in the extent of one-line budgeting (Hood 1991). Consistent with the notion of decentralisation, is the separation under NPM of the production process from the delivery of services and the out-sourcing and privatisation of certain activities. There is an emphasis on competition within and outside the public sector and the exposure of public activities to open tendering. From an employment perspective, there is a preference for private sector practices offering top management ‘greater flexibility in hiring and rewards’ (Hood 1991: 5). Underlying this is an emphasis on discipline, parsimony and resistance to union demands (Hood 1991).

**REFORM OF MANAGEMENT EMPLOYMENT IN VICTORIAN LOCAL GOVERNMENT**

As we have identified, most English-speaking commonwealth countries have launched or been involved in major public sector reform programs in the 1980s and 1990s. In Australia, these reforms embraced all three levels of government including local government. In Victorian local government, the reforms encompassed changes in areas such as employment relations, a greater emphasis on results, and the introduction of compulsory competitive tendering (Van Gramberg and Teicher 2000). Many of the reforms resulted or emanated from the introduction of the Victorian Local Government Act 1989 (VLGA 1989).

The new Act removed many of the employment relations restrictions placed upon councils by the Local Government Act 1958 (VLGA 1958). These restrictions included the imposition of statutory positions, the need for certificated appointments and the permanent nature of senior appointments. Under VLGA 1989, local government units (LGU) can now design their organisational structures to fit the needs and objectives of the council and their community. There is no such thing as a designated or statutory officer and no requirement for councils to appoint a certain number or type of officers. Councils are free to decide the type of positions they want, how many of them they intend to have, where they will be and when they will be filled (VLGA 1989: s.94).

A further easing of senior officer human resource (HR) restrictions is the discarding of the system of certification. The councils can now make the decision on whom to appoint based on qualifications they themselves specify for the position. As with many organisations in the private sector, councils are now able to prepare job descriptions for officer positions and recruit people based on those job description requirements. Councils can recruit people who do not have certificates but who have an appropriate university degree or other qualification as specified in the job description.

Perhaps the most significant HR issue in the new Act is that councils can now terminate the employment of any officer without instituting an inquiry, if they believe that the officer is not working to the satisfaction of council. The VLGA 1989 vests this authority with the CEO. Officers are now appointed on the basis of five yearly performance contracts, reviewed annually by the CEO. There is no implicit or implied agreement that these contracts will be renewed upon completion and the council and CEO can decide not to renew the contract of an officer. The sense of job security and effective tenure that existed in the minds of officers under the VLGA 1958 has largely disappeared (VLGA 1989).

It is important to note that while many human resource restrictions regarding senior management have been removed, others have been imposed. For example, the senior officer appointment process is clearly specified
in the Act (VLGA 1989: s.95). Prior to appointing a senior officer, LGU are required to advertise those positions widely and officers must be selected in fair and open competition. The skills, ability and knowledge of those selected should be comparable to those in the job description. As with other organisations, councils are required to follow equal employment policy in matters of recruitment and promotion. They are also required not to engage in personal favouritism and arbitrary action regarding these matters. Whilst councils are allowed to determine the salary and wage to be paid to officers, they are required to consider such factors as different job requirements and occupational categories (VLGA 1989: s.95).

Under the VLGA 1989 it can be safely stated that the CEO of an LGU is not only the officers’ hierocratic superior but also their employer. They determine who should be selected, who should be promoted, who should be sent for training, who should be on what salary or bonus and whose contracts should or should not be renewed. Officers are not only contractually bound to obey CEO task commands but as the CEO now controls the HR domain, they are also dependent on the CEO for continuation in their positions. The scope and power of councils and their CEOs under VLGA 1989 has been substantially expanded.

In summary, although the post VLGA 1989 regime requires councils to follow specific employment relations processes and procedures, it is quite clear that employment related power and task related power over officers within Victorian local government units has largely been fused under the control of the CEO. This has created a strictly hierarchic organisational structure, characteristic of private sector organisations. For the most part, councils are only required to pay heed to the same external ER considerations as private sector organisations. Before discussing some broader implications of these changes, the paper considers questionnaire survey data determines if the statutory provisions have actually been implemented.

METHODOLOGY

The study adopts a survey and interview methodology situated in the findings of secondary data analysis sourced from previous work in the area (Pullin 2002). The aim of the secondary data analysis was to identify the anticipated employment conditions of these senior managers. To achieve this aim, copies of the VLGA 1958, the VLGA 1989 and their respective amendments were obtained for analysis purposes. The legislative changes introduced to Victorian local government as prescribed in the VLGA 1989 were analysed to determine the statutory requirements framing the local government senior officer ER. A similar analysis was conducted on the VLGA 1958.

The aim of the questionnaire survey analysis was to develop a broader understanding of the actuality of the senior officer ER as it is practised in Victorian local government. The main objective was to collect and examine aggregate data from a representative sample of the population. This sought to ascertain senior officer employment behaviour and action across more than one organisational setting (Fielding and Fielding 1986). The survey outcomes were compared and contrasted with the normative perspectives identified in the secondary data analysis.

The survey questionnaire was developed specifically for the research (Pullin 2002) and data collection concentrated on all local government units in the State of Victoria, Australia. Seventy-eight LGU were identified in this category. Each unit was contacted by telephone and 256 senior officers who had direct contact with councillors were identified (this included CEOs). The questionnaire was sent to all 256 senior officers comprising the total population of senior officers in Victorian LGU. Of these, 138 completed forms were returned which equates to a response rate of 52 percent. Not all of the senior officer positions were filled at the time the survey was distributed, as evidenced by six surveys being returned unopened to the sender. Surveys were accepted where the respondent indicated they were ‘acting’ in the position.

The respondents came from diverse functional areas including corporate affairs, human resource management, customer service, strategic planning, budget and finance, and community services. This is consistent with the view that diversity among respondents strengthens the validity of results (Felts and Schumann 1997). All 138 surveys were useable and the questions were encoded and data entered utilising
Of the 138 respondents who completed questionnaires, 26 were the subject of semi-structured interviews. This enabled the methodology to integrate both quantitative and qualitative research in a strategy where the quantitative research facilitated the choice of subject for qualitative investigation (Bryman 1992). In adopting this approach the study brings together the benefits of structure and process. As Bryman states “quantitative research is especially efficient at getting to the “structural features” of social life, while qualitative studies are usually stronger in terms of “processual” aspects’ (Bryman 1992, 60). The interview data is used in this paper to support the survey data and provide a richer analysis and discussion of the senior officer ER.

SURVEY FINDINGS

The nature of the ER in the questionnaire survey is determined through a set of five discrete statements (see Tables 1 and 2). The responses are reported on a Likert type scale where strongly disagree = 1 and strongly agree = 5. The mean values of the individual dimensional statements for each type are examined for significant difference utilising a one-sample $t$ test.

Table 1 indicates the mean value and $t$ test result for each variable examining external influences on senior officer ER matters. It can be seen from the table that there is little prima facie support for external influence in all of the dimension statements: selection ($M = 1.27$), dismissal ($M = 1.33$), promotion ($M = 1.36$), development ($M = 1.30$) and HR appeals ($M = 1.64$). Statistical analysis (Table 1) revealed the lack of support for each of these dimensions was significant: selection; $t (137) = -35.154$, $p < .05$, two-tailed, dismissal; $t (137) = -26.521$, $p < .05$, two-tailed, promotion; $t (137) = -27.925$, $p < .05$, two-tailed, development; $t (137) = -36.316$, $p < .05$, two-tailed, and HR appeals; $t (137) = -17.329$, $p < .05$, two-tailed. It can be safely stated from this finding that the dimensional analysis provides little support for any existence of external influence on senior officer ER matters.

Table 2 indicates the mean value, standard deviation and $t$ test result for each variable testing the degree of internal influence on senior officer ER. It can be seen from the table that there is prima facie support for a high degree of support for internal influence on the senior officer ER, in four of the five dimension statements: selection ($M = 4.33$), dismissal ($M = 4.52$), promotion ($M = 4.47$) and HR appeals ($M = 4.17$). Support for the development dimension was less decisive ($M = 3.28$). Statistical analysis (Table 2) revealed that the support for each of the dimensions, including development, was significant: selection; $t (137) = 15.503$, $p < .05$, two-tailed, dismissal; $t (137) = 20.674$, $p < .05$, two-tailed, promotion; $t (137) = 19.180$, $p < .05$, two-tailed, development; $t (137) = 2.680$, $p < .05$, two-tailed, and HR appeals; $t (137) = 13.598$, $p < .05$,
two-tailed. It can be safely stated that the dimensional analysis findings support a high degree of internal influence senior officer ER.

Table 2: Internal Influence on Senior Officer ER Matters

<table>
<thead>
<tr>
<th>Dimension</th>
<th>Statement</th>
<th>Mean ( (M) )</th>
<th>One-Sample ( t ) test ( (DF = 137) )</th>
</tr>
</thead>
<tbody>
<tr>
<td>Selection</td>
<td>Senior officer selection decisions are made by the CEO and/or the elected councillors</td>
<td>4.33</td>
<td>15.503*</td>
</tr>
<tr>
<td>Dismissal</td>
<td>Senior officer dismissal or non re-appointment decisions are made by the CEO and/or the elected councillors</td>
<td>4.52</td>
<td>20.674*</td>
</tr>
<tr>
<td>Promotion</td>
<td>Promotion decisions for senior officers are made by the CEO and/or the elected councillors</td>
<td>4.47</td>
<td>19.180*</td>
</tr>
<tr>
<td>Development</td>
<td>Access by senior officers to training, career development and personal development opportunities is determined by the CEO and/or the elected councillors</td>
<td>3.28</td>
<td>2.680*</td>
</tr>
<tr>
<td>Appeals</td>
<td>Senior officer grievance, appointment, promotion appeals etc. are determined by the CEO and/or elected councillors</td>
<td>4.17</td>
<td>13.598*</td>
</tr>
</tbody>
</table>

Note: * = significant at \( P < .05 \)

DISCUSSION

The survey and interview data clearly indicate that the senior officer employment reforms introduced through the VLGA 1989 are a reality and largely conform to the concept of NPM. The CEOs have been given flexibility in managing their senior staff, who are now employed on a performance contract basis. The interviews identified that many LGU have financial incentive schemes for senior officers and reward them with bonuses for achieving their performance targets. There is a much greater emphasis in municipalities on achieving results. The data also indicated that there are very few checks on the CEO and councillors in terms of whom they recruit as senior managers.\(^1\) They have wide-ranging freedom in negotiating terms and conditions of council staff. This freedom confirms that there is a concentration of power in the hands of top management and virtually no diffusion of power. This is clearly a move away from the previous practice that worked at the behest of the VLGA 1958.

As previously outlined in this paper, under the VLGA 1958 there were substantial restrictions on councils over various ER matters. Councils could not design their own organisational structure and it was stipulated that they would have to appoint certain officers such as clerks, engineers, and surveyors, irrespective of the council’s needs and budget capability. Councils were also restricted in regard to the manner of recruitment and selection. They could not recruit an uncertified person even if they found one quite suitable for their requirements. They could only recruit from a limited pool of people who had the appropriate certificate from the appropriate registration boards (VLGA 1958: s.160–164).

The registration boards gave certificates to candidates based on the board’s assessments. They decided the selection criteria, which included, in addition to academic qualifications, such matters as experience of working with local government, age and character, with minimal input from the councils. In effect, these boards decided who were and who were not suitable for local government work. They also had the power to deregister people with certificates and thereby prevent them from seeking employment with councils (VLGA 1958: s.170–172).

\(^1\) This situation has been changed slightly under the Victorian Local Government (Further Amendments) Act 1997. Under this Act, the Office of Local Government (OLG) now has ‘the power to authorise any changes to the status of employment of Chief Executive Officers (CEOs) and other senior council staff, including the power to veto senior appointments made by council’ (Van Gramberg 2000, 479).
There were also effective restrictions on LGU in matters of terminating the employment of officers. Many clauses in the VLGA 1958 effectively deterred councils from terminating their employment. If a council intended to dismiss an officer, they were required to provide the officer in writing with the reasons for termination. In addition, a council could only dismiss an officer after an inquiry was held. The composition of the inquiry was determined by the Governor-in-Council and was beyond the control of the council. The process was also financially onerous as the council had to remunerate the officer for the period of his/her suspension. In other words, even though councils could make decisions regarding officers’ salaries, three of the most important HRM decisions – selection, promotion and dismissal – were largely outside of their control. However, the officers were under the control of the LGU in matters related to the task domain (VLGA 1958: 160).

The separation between features of the senior officer human resource domain and the task domain that operated under the VLGA-58 can be termed a ‘diffusion’ of power. The power over the senior officer employment relationship was divided; this division limited the potential for abuse of the power by any one of the parties involved. In effect, the external agencies controlled the recruitment function while council controlled the selection function. In matters of termination, power was again divided between the council and the state government. Underlying these arrangements was a division of power which created a check and balance among power holders. This check and balance existed under and was structured by the umbrella of statutory control.

Under this type of organisational design, which is inherent in liberal democratic forms of government, the objective is to exert control and restraint over offices and entities authorised to exercise public power. In this design, power over matters are rarely conferred on one particular entity or office (Emy and Hughes 1991). As we have seen, under VLGA 1958 councils did not have power over all aspects of the senior officer HR. The certification boards did the recruiting through the certification process and created a pool of officers with appropriate certificates. Councils could only select from that pool. Councils could not recruit, but importantly, certification boards could not select. In the same way, councils could select senior officers but they could not easily dismiss them without the approval of the state government. Councils could initiate the process but they could not judge the termination decision. This particular division of power, through independent boards controlling significant aspects of human resource matters, has long been a facet of public management. It aim is to stop the influence of patronage in recruitment and selection.

The system of statutory positions, along with certification, provided councils and their constituents with competent and properly trained officers. The certification system assisted in ‘excluding nepotism, the dishonest, and those with a bad administrative record’ (NRLGLM 1989: 34). It has been argued that the absence of certification by boards would lead to reduced central control and reopen the door to political patronage. This would result in lower standards, place undue weight on academic qualifications and less emphasis on experience (NRLGLM 1987: 15; VLGA 1958).

Therefore, there is the potential for the current system, with its concentration of power in the hands of council, to recreate the spoils and patronage system that was rampant in public sector appointments in the eighteenth and nineteenth century. The human resource reforms under VLGA 1989 could return us to a system where politicians could appoint anyone they like. We found no evidence of patronage appointments in Victorian local government. However, the same cannot be said for the other two levels of government. It appears that when a change of government occurs at the state or federal level, this is accompanied soon after by the departure of a large number of heads of departments and the arrival of a new set of appointees (Weller and Wanna 1997).

These authors (Weller and Wanna 1997: 152) noted that: ‘in Australia there has been a growing tendency to dismiss serving departmental heads as a new government comes to office and replace them with their own preferred employees.’ The new Howard government ‘replaced 40 per cent of the existing department secretaries within its first 100 days of office’ (Prasser 1997: 113). In Queensland, when the Borbridge government came to power:

\[2\] In exploring the literature, we found a general absence of research that considered the degree of politicisation extant in the recruitment of council staff.
almost all of the former government department and key statutory board heads were sacked, had resigned or in a couple of cases been reassigned to less senior posts. As well, numerous other less senior staff were similarly treated and the membership of all major statutory boards (TAB, Queensland Travel and Tourism Corporation, Brisbane Ports) was almost totally changed. (Prasser 1997: 113-114)

Prasser (1997: 114) stated that ‘the new appointees were seen in most cases to be overtly partisan with many former senior staff from previous National Party administrations finding new employment along with others with close personal links to ministers (wives, family members).’ In New South Wales, close to 26 directors and chief executive staff had left or been sacked within two years of the Carr Labour government coming to office (Prasser 1997). ‘Thus, 1996 saw political interference in the public sector reach new zeniths in Australia. Previous conventions and practices of insulating the public sector from overt political interference were fully swept aside’ (Prasser 1997: 14).

Alford (1993: 5) states that it is not clear whether the abolition of external control, in the form public service boards, is associated with the politicisation of ER matters; as the matter seems to be more complex. He argues that selection outcomes based on merit or patronage would depend on at least five factors; not just the strength of centralised external boards, such as public service boards. These factors are the prevailing political culture, the degree of electoral support for party in power, the policy priorities of the government of the day, the relative strength of other central agencies, and the personal values of personnel decision makers (Alford 1993: 7).

We would add another factor at the level of local government, this is the internal check and balance in the generally bipartisan, ‘non cabinet’ form of government to be found in municipal government in Australia. There may well be cause for concern that politicisation may be applicable in a cabinet form of partisan government, with individual responsibility for a ministerial portfolio. However, politicisation is far less likely to occur in a government setting where there is no individual portfolio responsibility, where policy decisions are made collectively and for the most part are on the public record.

A further, justifiable concern under NPM is the potential for councillors to appoint incompetent staff, thus depriving the community of a skilled service. The superseded system of certification administered by various boards offered a ‘degree of protection, assurance and guidance [to the Councils] in the selection of individuals for statutory positions’ (NRLGLM 1987: 17) and was helpful to the smaller or more remote Councils (NRLGLM 1987: 11). We found little evidence that councillors had appointed incompetent staff. Quite the opposite, the senior managers interviewed displayed an extremely high level of professionalism, commitment and dedication to the advisory role and the policy demands of council.

However, local government officers have argued in the past that protection from removal from their offices assists ‘them in carrying out their tasks in the interests of the community without being intimidated by unfair attitudes or the displeasure of a councillor or a group of councillors’ (BRRSALGV 1979: 16.73). Victorian local government officers, in giving evidence before the Bains Committee, argued that under the certification system they could work fearlessly for the community because they had some sort of protection from easy removal by councillors (BRRSALGV 1979). Similarly, many critics of NPM have argued that a concentration rather than a diffusion of power over senior officer ER matter would create a set of managers who would do what their political masters want them to do rather than what they should do (Considine 1988; Self 1995). Available evidence suggests that the values of local government officers, the ability and willingness to give fearless advice, are not really influenced by the type of employment relationship they work under (Haidar and Pullin 2000). At the Commonwealth level, ‘secretaries argue they give the same frank advice [even without tenure] they always did … they see it is their professional duties as public servants. It remains a matter of integrity’ (Weller and Wanna 1997: 22). These authors add that ‘there need

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3 Under the VLGA 1989 there is a limited provision for the CEO and senior officers to be delegated some of the ‘power, duty and function of a Council’ (s. 98).

4 In some cases local government meetings are held ‘in camera’ but in effect their decisions are still on the public record.
not be an automatic link between the form of the contract of the public servant and the nature of the advice provided. The equation depends on the individual; it is not possible to legislate for courage’ (Weller and Wanna 1997: 22).

These Australian findings are confirmed by a study of local government officers in Penang, Malaysia (Haidar, Pullin, and Lim 2001) which indicates that these issues are much more complex than many commentators have implied. It suggests that the stand officers take will also depend on the attitude of politicians in power. Under a democratic system, ultimate power rests with the ruling politicians. The Malaysian study suggests that there are circumstances where a determined and forceful group of politicians can coerce an officer to do what they want them to do (Haidar, Pullin et al. 2001), it has little to do with the nature of the employment relationship.

CONCLUSION

Concern has been expressed that the conferring of politicians with power over public service employment matters would lead to the politicisation of public management, where politicians recruit public servants based on patronage. These political appointees are then coerced to be, or are, responsive to the political ideologies of their patron, thus depriving the community of an independent voice within the public service.

We examined the nature of public management employment in Victorian local government and found that the changes envisaged by the VLGA 1989 had been implemented and are consistent with the notion of new public management. We also explored the issue of the politicisation of public management. Although, there was some evidence of the potential politicisation of the public service at the federal and state levels (Prasser 1997; Weller and Wood 1999), we found little evidence of its occurrence at the level of local government in Victoria. We argue that there is little evidence that a change to an NPM type employment relationship in isolation will lead to the employment of local government managers who will do what their political masters want them to do, rather than what they should do.

We concur with Alford (1993), that the association between political control of public service employment on the one hand, and the politicisation and creation of a responsive public service on the other hand, is not as straightforward as many commentators have assumed. Alford identifies five factors at the Federal level that he argues need to be satisfied for a merit or patronage appointment to occur, we add a sixth at the level of local government. We argue that the internal check and balance inherent in the generally bipartisan, ‘non cabinet’ form of local government in Australia prevents or severely limits the potential for the occurrence of politicisation. We argue that politicisation is unlikely to occur in a government setting where individuals do not have responsibility for a portfolio and where policy decisions are made for the most part on the public record.
REFERENCES


Victoria, Local Government Act 1989 (incorporating amendments up to Act No 103/1995).


